



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Ray II Wind Farm

Case Reference: EN0110031

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

16 June 2026

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APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

1. INTRODUCTION

- 1.0.1 On 06 May 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Vattenfall Wind Power Ltd (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Ray II Wind Farm (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110031>

- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.0 Description of the Proposed Development

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
201	Paragraph 2.4.2	Battery Energy Storage System (BESS) and on-site substation	The ES should include the description of the physical characteristics and technical capacity of the BESS and substation. This should be sufficiently developed in the ES to include details such as construction and maintenance requirements, location, battery technology type/ specification and anticipated number of containerised battery units. Ancillary development to the substation and BESS such as fencing and lighting should also be clearly described and assessed.
202	Paragraph 2.4.4	Grid connection	At this stage, the information provided regarding the grid connection is very high level, and it is stated that this will be refined through consultation with stakeholders, detailed design and environmental surveys. The ES should describe the proposed route for cabling and connection point including details of foundations for pylons if an overhead line is chosen, or trench width, depth, and working width if underground cabling is the chosen option. The works required to install the cables should be described, including jointing bay location(s) and size (if required) and any dewatering of excavations and crossings.
203	Paragraph 2.4.6	Concrete batching plant(s)	The Scoping Report includes the potential of requiring concrete batching facilities as one of the site components. No further details are provided. If a concrete batching plant(s) is required, the ES should include details regarding its size and impacts on aspects such as landscape, water abstraction and management of wastewater.
204	Paragraph 2.4.7	Anemometry mast	It is explained that an anemometry mast will be required to monitor wind speed, direction and turbulence and that this will be required for the lifetime of the proposed development. The anemometry mast is stated to be a similar height to the turbines. The proposed development will be subject to a reduced lighting scheme where not all turbines will be lit.

ID	Ref	Description	Inspectorate's comments
			The ES should explain whether the mast will be lit and this should be included in relevant aspects such as the assessment of effects from nighttime lighting.
205	Paragraph 2.4.8	Borrow pits	The ES should provide further details regarding borrow pits if required for the proposed development. Details should include location, volume of materials required and confirmation that materials required for restoration are available from within the Scoping Boundary. The ES should also set out alternative options, should the borrow pits not provide the material required and any implications of this.
206	Paragraph 7.5.4	Horizontal Directional Drilling (HDD)	The Inspectorate notes that no parameters have been provided for the proposed HDD. The ES should include construction parameters, potential locations where HDD will be required and demonstrate whether any groundwater bodies are located along the HDD route. The ES should also provide information on any construction compounds for the entry and exit pits.
207	Section 2.5	Decommissioning	Details provided in the Scoping Report regarding decommissioning are very high level at this stage. It is not clear whether turbine foundations and pylon foundations (if required), BESS and other site components would be left in-situ. It is also not clear whether the cable would be left in-situ if underground cabling were used. The Scoping Report states that a Decommissioning and Restoration Plan will be prepared and agreed with relevant authorities prior to decommissioning. The ES should provide a description of the activities and works which are likely to be required during decommissioning of the proposed development, including the anticipated duration. The ES should also explain how the Decommissioning and Restoration Plan will be secured in the DCO.

2.1 EIA Methodology and Scope of Assessment

ID	Ref	Description	Inspectorate's comments
21.1	Section 1.1	Differentiation between 'the Site', 'Cable corridor options', 'Proposed Development' and 'Scoping Boundary'.	Section 1.1 defines the Proposed Development as Ray II Wind Farm and its associated development. The Scoping Boundary is described as being 'the Site' (the turbine area) and the Cable Corridor Options. The Inspectorate considers that in certain aspects it can be difficult to understand what the study area comprises of and therefore the survey effort undertaken and proposed. In some chapters, the study area for 'the Site' is discussed at length, before a discussion of the study area for the cable corridor is explained. The Inspectorate appreciates that there will be different impacts from the turbine area and cable corridor options area. However, for reasons of clarity, it may be helpful if the study areas for each chapter are set out clearly and concisely at the start of each chapter.
21.2	Paragraph 1.1	Associated development	No details are provided in the Scoping Report regarding what associated development may consist of. The ES should describe any associated development and provide assessments on environmental aspects where significant effects may occur.
21.3	Paragraphs 2.4.1 to 2.4.4	Assessment of the worst-case scenario	The Scoping Report provides very high-level detail regarding how the worst-case scenario resulting from each component of the proposed development will be assessed. The ES should ensure that the assessment for the proposed development applies a worst-case scenario specific to that aspect area. It is not yet known whether the grid connection will be above or below ground. The ES should provide an assessment of effects from either option, applying the relevant worst-case scenario. The Applicant should make every attempt to reduce the range of options prior to submission of

ID	Ref	Description	Inspectorate's comments
			the DCO and explain clearly in the ES which elements of the proposed development have yet to be finalised and provide reasoning.
214	Chapter 16	Split between standard chapters and 'other issues'	Chapter 16 of the Scoping Report compiles a number of issues into a single chapter. The rationale for undertaking this approach rather than treating them as chapters in their own right is not clear. It is noted that this approach is also carried forward to the Commitments Register. If this approach is carried forward in the ES, it should be clear why this approach has been taken and how potential mitigation which may be required for each issue would be managed in the Commitments Register, noting that mitigation for the 'other issues' detailed in Chapter 16 could be very specific to that particular aspect.
215	Paragraph 16.7.3	Electro-magnetic fields (EMF)	Paragraph 16.7.3 explains that EMF relating to site infrastructure, such as the grid connection and BESS have been considered, and it is not likely to give rise to significant effects. The Scoping Report does not explain which sensitive receptors have been considered, nor provided information regarding distances where effects may occur. The Inspectorate considers that the ES should consider effects from EMF on both human and ecological receptors (such as fish).
216	N/A	Mitigation and Monitoring	The ES should clearly describe the details of any necessary avoidance and mitigation measures to be implemented, along with monitoring, reporting, and adaptive management procedures. These should be agreed, if possible, with relevant stakeholders and the ES should explain how they would be secured through the DCO.
217	N/A	Materials and waste	The Scoping Report does not explain how materials and waste will be considered in the ES. The ES should provide an assessment of waste and materials across all phases of the proposed development. This should include a detailed description of waste streams, including

ID	Ref	Description	Inspectorate's comments
			expected quantities of waste arisings and any monitoring measures required to ensure compliance.
21.8	N/A	Figures	Some figures provided in the Scoping Report are unclear when zooming in. The ES should ensure that figures used in the ES are clear and enable the reader to interpret the information it displays.
21.9	N/A	Footnotes	Many of the links in the footnotes in the Scoping Report do not work. The ES should ensure that any footnotes used are up to date and work.
21.10	N/A	Transboundary	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary

ID	Ref	Description	Inspectorate's comments
			Impacts and Process', links for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Landscape and Visual

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Tables 6.3 and 17.2	Consideration of landscape and visual receptors beyond 20km of the proposed wind turbines	The Scoping Report seeks to scope out impacts on landscape and visual receptors beyond 20km from the proposed wind turbines, on the basis that effects are unlikely to be significant due to distance and the likely limited influence on perception of the landscape, views, and visual amenity. The Inspectorate notes that targeted assessment of national level landscape designations or key visual receptors/ viewpoints will be undertaken beyond 20km out to 45km where potential for likely significant effects is identified at initial assessment stages. The Inspectorate considers that without any Zone of Theoretical Visibility (ZTV) to support the position within the Scoping Report, there remains a potential for significant effects to occur and therefore does not agree to scope this matter out.
3.1.2	Paragraph 6.7.4 tables 6.3 and 17.2	Consideration of cumulative landscape and visual effects resulting from cumulative developments beyond 20km of the proposed wind turbines	Table 6.3 of the Scoping Report seeks to scope out cumulative landscape and visual effects resulting from cumulative developments beyond 20km of the proposed wind turbines. This conflicts with paragraph 6.7.4 which states that the cumulative assessment will include consideration of planned wind farm developments within 45km. The Inspectorate does not agree to scope this matter out and considers that this should be assessed in the ES. The cumulative assessment should also include other developments in a vicinity to be informed by a ZTV and agreed with relevant consultation bodies if possible. This would ensure that a worst-case scenario is addressed in the event that the grid connection is via overhead line.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13	Tables 6.3 and 17.2	Consideration of cumulative developments with fewer than three turbines, or less than 50m in height, unless located within 5km of the proposed wind turbines	The Scoping Report seeks to scope out cumulative developments with fewer than three turbines, or those that are less than 50m in height, unless located within 5km of the proposed wind turbines, on the basis that cumulative effects resulting from these developments in-combination with the proposed development are unlikely to be significant due to the scale of the cumulative developments. The Inspectorate considers that without any ZTV to support this position within the Scoping Report, there remains a potential for significant effects to occur and therefore does not agree to scope this matter out.
3.14	Tables 6.3 and 17.2	Consideration of landscape and visual receptors within 20km of the proposed wind turbines with no or limited visibility of the proposed wind turbines	The Scoping Report seeks to scope out impacts on landscape and visual receptors within 20km of the proposed wind turbines with no or limited visibility of the proposed wind turbines, on the basis that effects are unlikely to be significant due to no or limited visibility. The Inspectorate considers that without any ZTV to support this position within the Scoping Report, there remains a potential for significant effects to occur and therefore does not agree to scope this matter out at this stage. The ES should include consideration of landscape and visual receptors within 20km of the proposed wind turbines or clearly demonstrate that there is no or limited visibility of the proposed wind turbines to the landscape and visual receptors within 20km of the proposed wind turbines.
3.15	Tables 6.3 and 17.2	Consideration of effects on residential visual amenity for residential receptors beyond 2km of the proposed wind turbines	The Scoping Report seeks to scope out impacts on residential visual amenity for residential receptors beyond 2km of the proposed wind turbines, on the basis that effects are unlikely to be significant due to distance. The Inspectorate considers that without any ZTV to support this position within the Scoping Report, there remains a potential for significant effects to occur and therefore does not agree to scope this matter out. The ES should include consideration of effects on residential receptors, based on a ZTV.

ID	Ref	Description	Inspectorate's comments
3.1.6	Paragraph 6.7.2 and figures 6.1 to 6.6	Study area for cable corridor options	Paragraph 6.7.2 of the Scoping Report proposes a study area of 1km buffer for the cable corridor options. The Scoping Report does not justify why this is deemed suitable and the Inspectorate is concerned that the worst-case scenario would not be assessed in the event that above ground pylons are used for the grid connection. The ES should justify the extent of the study areas used for the assessment of the different cable corridor options with reference to professional guidance and the extent of the likely impacts, informed by fieldwork and relevant models or approaches. A separate ZTV should be provided to assess the potential visibility and effects of cable infrastructure outside of the turbine area. The applicant should agree the study areas with relevant consultation bodies where possible.
3.1.7	Figure 6.4	Viewpoints	Figure 6.4 of the Scoping Report sets out the viewpoint locations proposed for the Landscape and Visual Impact Assessment (LVIA). The applicant should justify the location and number of viewpoints, ensuring these capture a worst-case scenario of impacts from the proposed development and are representative of visual receptors. Efforts should be made to agree the number and location of viewpoints as well as the locations for photomontages with relevant consultation bodies. The applicant's attention is drawn to the consultation response from Natural England (appendix 2 of this Scoping Opinion) in relation to viewpoint locations.
3.1.8	Figures 6.5 and 6.6	ZTV	It is currently unclear whether the grid connection will be installed above or below ground. The use of overhead lines with associated pylons could give rise to landscape and visual effects. The Scoping Report does not provide any ZTV for the cable corridor options area. As such, a separate ZTV should be provided to assess the potential visibility and effects of cable infrastructure outside of the turbine area.
3.1.9	N/A	Cultural heritage receptors	The applicant is advised to include heritage landscapes and viewpoints, as appropriate, to support the heritage assessment. Suitable cross referencing between the LVIA aspect chapter and Cultural Heritage and Archaeology aspect chapter should be included.

ID	Ref	Description	Inspectorate's comments
			The applicant's attention is drawn to the consultation response from Historic England (appendix 2 of this Scoping Opinion) in relation to the need for visual models or ZTVs and winter photography to assess impacts on the setting and significance of key heritage assets.
3.1.10	Paragraph 6.7.6	Aviation lighting assessment	The Inspectorate notes that an aviation lighting assessment will consider the visibility of turbine lighting from each LVIA viewpoint. The applicant's attention is drawn to the consultation response from Historic England and Northumberland National Park Authority (appendix 2 of this Scoping Opinion) in relation to the consideration of the impact on the significance of heritage assets and the Dark Sky Park status of the Northumberland National Park.
3.1.11	N/A	Landscape reinstatement	The Inspectorate considers that the ES should address the potential for permanent landscape character effects due to any planting restrictions introduced for any easement required.

3.2 Cultural heritage and archaeology

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Tables 7.7 and 17.2	Assessment of the direct physical impacts to heritage assets outside the site and cable corridor options, with the exception of designated assets such as bridges along transport routes	The Scoping Report seeks to scope out the assessment of direct physical impacts to heritage assets located outside the project boundaries, excluding designated assets such as bridges along transport routes, as no project activity will occur outside the project boundaries. On this basis, the Inspectorate agrees this matter can be scoped out of the ES.
322	Tables 7.7 and 17.2	Indirect physical impacts to heritage assets outside the 1 km study area, with the exception of designated assets such as bridges along transport routes	The Scoping Report seeks to scope out the assessment of indirect physical impacts to heritage assets outside the 1km study area, excluding designated assets such as bridges along transport routes, on the basis that infrastructure and construction activities associated with the proposed development is unlikely to generate any ground disturbance leading to indirect effects at this distance. On this basis, the Inspectorate agrees this matter can be scoped out of the ES.
323	Tables 7.7 and 17.2	Setting impacts to non-designated heritage of local importance	The Scoping Report states that the proposed development is unlikely to result in significant effects on the setting of non-designated heritage assets and proposes to scope this matter out of further assessment. Insufficient information has been provided to support this. The ES should include an assessment of significant effects where they are likely to occur or otherwise confirm why they would not, including confirmation of their location, intervisibility with the proposed development and evidence of agreement with the relevant consultation bodies.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
324	Tables 7.7 and 17.2	Setting impacts to designated heritage assets between 5 and 15 km from the site where they do not meet the selection criteria	This matter is proposed to be scoped out on the basis that these designated heritage assets do not meet the criteria which would require them to be scoped in to further assessment. Insufficient information has been provided on the nature and location of these heritage assets to rule out significant effects on their setting from the proposed development. The ES should include an assessment of significant effects where they are likely to occur or otherwise confirm why they would not, including confirmation of their location, intervisibility with the proposed development and evidence of agreement with the relevant consultation bodies.
325	Tables 7.7 and 17.2	Setting impacts to Grade II* and II Listed Buildings beyond 5 km where they are located within or clearly associated with nucleated settlement	This matter is proposed to be scoped out on the basis that these Grade II* and II Listed Buildings do not meet the criteria which would require them to be scoped in to further assessment. Insufficient information has been provided on the nature and location of these heritage assets to rule out significant effects on their setting from the proposed development. The ES should include an assessment of significant effects where they are likely to occur or otherwise confirm why they would not, including confirmation of their location, intervisibility with the proposed development and evidence of agreement with the relevant consultation bodies.
326	Tables 7.7 and 17.2	Impact resulting from the decommissioning phase of the proposed development	The Scoping Report proposes to scope this matter out on the basis that impacts due to decommissioning would be similar to the construction phase. See comments at ID 2.0.7 regarding decommissioning. The Inspectorate considers that there remains a potential for impacts during the decommissioning phase. In addition, given that the potential effects on setting during decommissioning are likely to be similar to those experienced during construction the Inspectorate is of the opinion that this matter cannot be scoped out at this stage. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of likely significant effect (LSE).

ID	Ref	Description	Inspectorate's comments
327	Paragraph 7.3.2	Study area	The ES should establish the study area with reference to the extent of the likely impacts which should be informed by fieldwork and the relevant zone of influence. The applicant should agree this study area with relevant consultation bodies where possible. The Inspectorate also considers that the setting influence of heritage assets may extend beyond their strict designation boundary and that the wider landscape context should be considered in the assessment (in conjunction with assessment in the Landscape and Visual ES Chapter). Reference to the ZTV should be made when defining the study areas. The applicant should make efforts to agree the approach with the relevant consultation bodies.
328	Paragraph 7.3.2.3	Study area for the cable corridor options	Paragraph 7.3.2.3 of the Scoping Report states that the study area for the cable corridor options has been established based on the assumption that an overhead line would be used. However, it is not yet confirmed whether the cable will be installed above or below ground. The Inspectorate therefore considers that the study area should be defined based on a relevant worst-case scenario, taking into account both overhead and underground cable options.
329	Paragraph 7.6.2	Hadrian's Wall World Heritage Site (WHS)	The applicant's attention is drawn to the consultation response from Historic England (appendix 2 of this Scoping Opinion) regarding the approach to considering potential impacts and mitigation of impacts on the significance of the WHS in the Heritage Impact Assessment.

3.3 Ornithology

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Paragraph 8.7.2 and tables 8.7 and 17.2	Northumbria Coast Special Protection Area (SPA)	The Scoping Report seeks to scope out impacts on the Northumbria Coast SPA, citing the distance of the SPA from the proposed development and lack of connectivity resulting in no likely significant effects. The Northumbria Coast SPA is located approximately 28km from the proposed development. At this stage, the Inspectorate considers there is insufficient information included in the Scoping Report to agree to scope out potential effects on the Northumbria Coast SPA. The ES should consider possible impacts on the Northumbria Coast SPA from the turbine area and cable corridor options, and on any functionally linked land (FLL).
332	Paragraph 8.7.2 and tables 8.7 and 17.2	Impacts on the North Pennine Moors SPA from the Site (turbine area)	The Scoping Report seeks to scope out impacts on the North Pennine Moors SPA from the turbine area, citing the distance of the SPA to the turbine area and lack of connectivity resulting in no likely significant effects. It is noted that potential impacts from the cable corridor on the SPA will be assessed. The Inspectorate considers that the ES should assess potential impacts on the North Pennine Moors SPA from both the turbine area and the cable corridor options due to the potential for the area to be used as FLL by qualifying features of the North Pennines Moors SPA.
333	Paragraphs 8.7.2 and 8.3.5.5 and tables 8.7 and 17.2	Common woodland bird species or widespread moorland species such as	The Scoping Report seeks to scope out impacts on common woodland bird species or "widespread" moorland species, including skylark and meadow pipit. The Scoping Report does not include details of the bird species that are considered to be common woodland bird species or "widespread" moorland species (with the exception of skylark and meadow pipit).

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		skylark and meadow pipit	Paragraph 8.3.5.5 includes both skylark and meadow pipit in a list of species which are of "high conservation concern at a national level" and have been recorded in the area. It is not entirely clear therefore why the Scoping Report seeks to scope out these two species in particular. Skylark is a bird species included on the UK's Red List for Birds of Conservation Concern and is listed under Section 41 of the Natural Environment and Rural Communities Act 2006 as a 'Species of Principal Importance', therefore, the Inspectorate considers the effects on this species should be assessed. With regards to meadow pipit and other bird species which the Scoping Report seeks to scope out an assessment for, the Inspectorate considers that at this stage there is an absence of information to support this position within the Scoping Report, such as evidence demonstrating clear agreement with relevant consultation bodies. As such, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these species or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
334	Paragraphs 8.3.1 and 8.3.2.1 and figures 8.1a and 8.1b.	Study area – statutory designated sites	The Scoping Report states that the desk study area for designated sites extends to 30km for the turbine area "the site" and to 5km for the cable corridor options. It is stated that this is based upon the connectivity of bird species in SPAs. However, the buffer shown in Figure 8.1a only extends out to 20km. The buffer shown in Figure 8.1b also only extends out to 2km from the cable corridor options. The ES should ensure that figures which are provided to support the main text should be consistent. As it is not yet known whether the grid connection will be underground or via an overhead line, the Inspectorate considers that the ES should include a wider study area of at least

ID	Ref	Description	Inspectorate's comments
			15km to account for maximum ranges for ornithological features. The applicant's attention is drawn to comments from Natural England (NE) (appendix 2 of this Scoping Opinion) in this regard.
335	Paragraphs 8.3.1 and 8.3.2.2	Study area – non-statutory designated sites	The study area discussed in Chapter 8 of the Scoping Report appears to relate to designated sites. While non-statutory designated sites are shown on Figure 8.1a, the ES should clearly explain and justify the study area for non-designated sites relevant to ornithology.
336	Paragraphs 8.3.1, 8.3.5.5 and 8.3.4.2 and technical appendix 8.1	Surveys	The current survey effort commenced in March 2023 and ran continuously until March 2025. Current survey efforts appear to have focussed on the turbine area, as shown in Figure 8.2 of the Scoping Report. Vantage point surveys have also been carried out, and these too focus on the turbine area only, as shown in Figure 8.3. Paragraph 8.3.5.1 refers to breeding bird and bird flight activity surveys for the cable corridor option areas which are due to be completed between April 2026 and March 2027. The ES should provide details of the bird survey efforts undertaken for the cable corridor options areas. Figures should be included which show the areas subject to survey efforts. The applicant's attention is drawn to the consultation response from NE (appendix 2 of this Scoping Opinion) regarding the extent of survey areas for certain species, such a nightjar. The ES should ensure that updates are provided to ensure a robust baseline at the point of submission of the DCO application.
337	Paragraph 8.3.1	Bird survey areas	The Scoping Report states that the bird surveys undertaken between 2023 and 2025 were divided into three areas; Area A, Area B, and Area C. The Scoping Report states, "During Spring 2025 Area C was removed from the potential development area because it was no longer included in the potential developable area being considered by the Applicant." However, the three survey areas are not shown on a plan. The Inspectorate considers that it would be helpful for this to be provided in the ES. The ES should confirm if the

ID	Ref	Description	Inspectorate's comments
			surveys undertaken in Area C - Harwood Forest have informed the impact assessment on ornithology as this is unclear.
338	Paragraph 8.3.2.2 and figures 8.1a and 8.1b	Local Wildlife and Geological Sites (LWGS)	LWGSs are identified on Figure 8.1a and 8.1b of the Scoping Report and identified as part of the site's baseline conditions in paragraph 8.3.2.2, but they are not explicitly listed as being scoped into the ES for consideration of likely significant effects. The ES should include LWGS within the assessment and include details of mitigation measures if required, and how any measures would be secured in the DCO.
339	Paragraph 8.3.4.2	Overwintering birds	The Scoping Report states that no evidence was found for appreciable use of the existing Ray Wind Farm study area by wintering geese or swans. The ES should provide information regarding other bird species which may use the turbine area of cable connection options area either on passage or for overwintering. Information should be sought from relevant consultation bodies and an assessment should be undertaken where significant effects are likely.
33.10	Section 8.3.4	Monitoring data	The Scoping Report outlines findings from monitoring undertaken for the existing Ray Wind Farm between 2003 and 2025. If this information is to be relied upon, then the ES should provide further details of the survey efforts, including the number, timing, and methodologies of the surveys undertaken.
33.11	Paragraph 8.3.4.3	Bird carcass records	The Scoping Report refers to surveys undertaken for the existing Ray Wind Farm for bat carcasses, during the operational phase (2017 – 2025) and that during these surveys, bird carcasses were also recorded. It is stated that the surveys for bat carcasses were undertaken each year, but it is not clear whether surveys were undertaken regularly during the 2017 – 2025 period, or just once per year. The ES should provide details regarding the number and frequency of visits to the site to record bat/bird carcasses. The bird and bat carcass data gathered during the carcass surveys should be included in the collision risk assessments. The ES should also explain whether bird carcass monitoring would be undertaken as part of the operational phase of the proposed development.

ID	Ref	Description	Inspectorate's comments
33.12	Paragraph 8.3.4.3	Protected species records	The Scoping Report refers to the finding of carcasses of one peregrine falcon, one osprey, and one merlin. No details are provided to ascertain if the cause of death could be directly attributable to the existing wind farm and therefore the ES should explain how this information informs the assessment of effects on protected bird species.
33.13	Paragraph 8.4.1	Potential impacts – collision risk	The Scoping Report identifies collision risk as being a potential impact. This relates to “turbine towers, blades (moving or stationary) and/or associated infrastructure.” It is not clear whether this includes the possibility of the grid connection being an overhead line. The ES should include collision risk with the overhead line as a potential impact pathway.
33.14	Paragraph 8.4.1	Potential impacts - lighting	The ES should provide information regarding lighting requirements during all phases of the proposed development and potential impacts lighting may have on ornithological receptors.
33.15	Paragraph 8.3.2.2	Linnheads Lake and Lisle Burn Local Wildlife and Geological Site (LWGS)	The Scoping Report states that no details are available regarding the specific species of interest of the Linnheads Lane and Lisle Burn LWGS. The Inspectorate considers that the ES should provide further details regarding this site as it is located within the cable corridor options area. The ES should provide information on the species present in order to understand the impact pathways for those species and any necessary mitigation and compensation which may be required.
33.16	NA	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features. Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication.

ID	Ref	Description	Inspectorate's comments
			The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm. All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.

3.4 Ecology and Nature Conservation

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Tables 9.4 and 17.2	- Wharmley Riverside SSSI - Gunnerton Nick SSSI - Stonecroft Mine SSSI - Simonside Hills SSSI - Mill and Whiskershiel SSSI - Billsmoor Park and Grasslees Wood SSSI	Scoping Report chapter 9 states that the study area will consist of the Scoping Boundary (wind turbine area and the cable corridor options areas). However, table 9.4 seeks to scope out further assessment of the SSSI's listed due to distance and/or separation from the Site. As stated in Section 1.1 of the Scoping Report, the Site refers only to the turbine area. It is therefore unclear whether the impacts on the SSSI's listed have been assessed with regards to the cable corridor options area. With reference to all SSSIs listed, the Scoping Report notes that traffic routes, traffic numbers and types of vehicles required during construction is not yet known, on this basis, the Inspectorate considers that insufficient evidence is provided to be able to scope out effects at this stage. The ES should provide an assessment of likely significant effects on all relevant SSSI's from both the turbine area and the cable corridor options and this should be made clear in the ES.
34.2	Tables 9.4 and 17.2	Tyne Watersmeet SSSI	The Scoping Report seeks to scope out Tyne Watersmeet SSSI, despite its hydrological connection to the Site. This is because significant effects to watercourses are not considered to be likely given the applicant's commitment to either undertake HDD at a depth of 5m if the cable is underground, or to set back overhead line infrastructure at least 15m back from the watercourse. The design of the proposed development has not been finalised. At this stage, the Inspectorate considers that potential impacts on Tyne Watersmeet SSSI should be scoped

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			in until there is finalisation of the design of the proposed development and certainty of how HDD will be secured.
34.3	Tables 9.4 and 17.2	Freshwater pearl mussel	The Scoping Report seeks to scope out freshwater pearl mussel, stating that impacts are unlikely to occur to the watercourses where the species is resident. This is on the basis that watercourse crossings by HDD are proposed to be at a depth of 5m and infrastructure would be set back from watercourses by at least 15m if overhead lines are installed. Given the potential risk of water pollution during construction, operation and decommissioning, the Inspectorate consider that this species should not be scoped out of the ES at this stage. The ES should include an assessment of the effects on freshwater pearl mussel or otherwise present a justification as to why significant effects are not likely to occur.

ID	Ref	Description	Inspectorate's comments
344	NA	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features. Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication. The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm.

ID	Ref	Description	Inspectorate's comments
			All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.
345	Paragraph 8.3.4.3	Bat carcass records	The Scoping Report refers to surveys undertaken for the existing Ray Wind Farm for bat carcasses, during the operational phase (2017 – 2025). It is stated that the surveys for bat carcasses were undertaken each year, but it is not clear whether surveys were undertaken regularly during the 2017 – 2025 period, or just once per year. The ES should provide details regarding the number and frequency of visits to the site to record bat carcasses. The bat carcass data gathered during the carcass surveys should be included in the collision risk assessments. The ES should also explain whether bat carcass monitoring would be undertaken as part of the operational phase of the proposed development.
346	Paragraph 9.3.1	Ecological study area	The Scoping Report defines the ecological study area to be a 5km buffer from the scoping boundary (the turbine site and cable corridor options area). Beyond 5km, qualifying species were considered unlikely to be affected. It is not clear from the Scoping Report what constitutes a 'qualifying species'. Furthermore, the Inspectorate considers that the ecological zone of influence may extend beyond 5km, especially in relation to mobile species, for example fish and bat species. The ES should detail how the study area has been informed by potential impact pathways and where possible, the study area should be agreed with relevant consultation bodies. It should also explicitly identify all qualifying species.
347	Paragraph 9.4.1	Impacts – EMF and bentonite frac-out	If HDD will take place beneath watercourses for the laying of cables, an assessment of the impact pathway from potential bentonite frac-out should be scoped into the ES. As set out at ID 2.1.5, the ES should also consider effects from EMF on ecological receptors such as fish.
348	Paragraph 9.4.1	Impacts - habitat fragmentation	The ES should assess the effects of temporary and permanent fencing, lighting and other disturbances or obstacles to species movement which could result in habitat fragmentation. The applicant's attention is drawn to the consultation response from Corsenside Parish Council (appendix 2 of this Scoping Opinion) in this regard.

ID	Ref	Description	Inspectorate's comments
34.9	Paragraph 9.4.1	Impacts - lighting	The Scoping Report identifies operational lighting as a pathway for effect. The ES should also consider the impact of lighting during the construction and decommissioning phases on ecological receptors.
34.10	Paragraphs 9.4.1 and 9.4.2	Impacts - noise and vibration	See ID 3.8.4. for reference to blasting impacts.
34.11	Paragraph 9.4.3	Impacts - decommissioning	Paragraph 9.4.3 refers to operational effects rather than decommissioning effects. The ES should ensure that the correct phase is discussed in each section.
34.12	Paragraph 9.5.2	Avoiding designated sites	The Scoping Report claims that the proposed development will avoid all designated sites, including appropriate buffer zones. However, New Scroggs SSSI is located within the cable corridor options area. Designated sites should be avoided wherever possible, according to the mitigation hierarchy. If the proposed development site is to intersect an ecologically designated site, clear justification should be provided, including how likely significant effects will be avoided. Any mitigation/compensation which may be required must be included in the ES, along with the mechanism by which that mitigation/compensation is to be secured in the DCO. Consultation with relevant consultation bodies is advised regarding this matter and agreement with those bodies on any avoidance, mitigation, or compensation approaches should be sought where possible.
34.13	Paragraphs 9.5.4.1 and 9.5.4.2	Water vole and white-clawed crayfish surveys	Paragraph 9.5.4.1 of the Scoping Report states that water vole and white-clawed crayfish surveys will be undertaken in the turbine area. Paragraph 9.5.4.2 does not specify whether these surveys will also be undertaken in the cable corridor options area. Given that the final design of the proposed development is not yet known, the Inspectorate considers that the surveys for these species should also be undertaken in the cable corridor area, or clear justification should be provided as to why this is not required and

ID	Ref	Description	Inspectorate's comments
			why likely significant effects will not occur. Consultation with relevant consultation bodies is advised regarding approach to surveying.
34.14	Paragraphs 9.5.4.1 and 9.5.4.2	Great crested newt (GCN) survey extent	With regards to the wind turbine area, paragraph 9.5.4.1 of the Scoping Report notes that GCN surveys will take place within 250m of the site rather than 500m of the site, due to barriers in this area which would prevent GCN dispersing any further than this. Paragraph 9.5.4.2, which focuses on the cable corridor area, also identifies the survey area as including a 250m buffer area, but it does not explain why a 500m buffer was not chosen in this case. It should be made clear in the ES why a 250m buffer area from the cable corridor area is an acceptable geographical survey extent for GCN. Consultation with relevant consultation bodies is advised regarding the approach to surveying.
34.15	Paragraphs 9.5.4.1 and table 9.2	Fish surveys	Table 9.2 of the Scoping Report provides a high-level summary of findings of the Fish Habitat Survey which was undertaken in 2025 relating specifically to the turbine area. It is noted that no further fish surveys are included in the list of surveys to be undertaken in 2026 (paragraph 9.5.4.2). The Inspectorate considers that further fish surveys should be undertaken, including for the cable corridor area and an appropriate buffer area. The results should be presented in the ES, together with any necessary mitigation measures and an explanation of how mitigation would be secured in the DCO. Consultation with relevant consultation bodies is advised regarding the approach to surveying.
34.16	Paragraphs 9.5.4.2 and 9.6	District Level Licensing (DLL) for great crested newts	The applicant intends to offset the effects of the proposed development on GCN by obtaining a licence through the Natural England DLL scheme. The Inspectorate understands that the DLL approach includes strategic area assessment, the identification of risk zones, and strategic opportunity area maps. The ES should include information to demonstrate whether the proposed development is located within a risk zone for GCN. If the applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the proposed development is likely to have a significant effect on GCN. The outcome of this assessment will be documented in an Impact Assessment and

ID	Ref	Description	Inspectorate's comments
			Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the proposed development's impact on GCN and the appropriate compensation required.
34.17	Tables 9.3, 9.4 and 17.2, and figure 9.2	Additional SSSIs	Figure 9.2 of the Scoping Report identifies various designated sites within 5km of the proposed order limits. However, several of these sites are not listed in table 9.3 'Statutory Designated Sites within 5 km of the Scoping Boundary' nor in tables 9.4 or 17.2. These include the following SSSIs: Redesdale Ironstone Quarries, Bavington Craggs, Settlingsstones Mine, Fallowfield Mine and Brunton Bank Quarry. The ES should ensure that all statutory designated sites within the agreed study area are considered in the assessment. The Scoping Report also seeks to scope out all sites further than 5km from the proposed development boundary. However, where a pathway for effect exists between the designated site and turbine area and cable corridor options area, the ES should include consideration of these sites in its assessment of likely significant effects.
34.18	Paragraph 8.3.2.2 and figures 8.1a and 8.1b	LWGS	LWGSs are identified in Chapter 8: Ornithology, however, consideration of these sites appears to have been omitted from the ecology chapter. The ES should assess effects on any LWGS relevant to the ecology chapter and include details of any mitigation and compensation measures if required, and how these measures would be secured in the DCO.
34.19	N/A	Invasive Non-Native Species (INNS)	The Scoping Report does not provide information regarding presence of INNS or survey efforts to identify INNS. The ES should assess potential impacts from INNS where significant effects are likely to occur. Where mitigation measures are required, the ES should describe these measures and signpost where they are secured through the DCO.
34.20	N/A	Habitat Management Plan for Ray 1 Windfarm	The Northumberland County Council Ecologist notes that the proposed development site is located within the area where the existing Habitat Management Plan for the Ray 1 Windfarm is being implemented. The ES should consider the implications of this for the proposed development and for the relevant ecological receptors within the Habitat

ID	Ref	Description	Inspectorate's comments
			Management Plan area. Further discussion with Northumberland County Council is advised regarding this matter.
3421	N/A	Environmental data-sharing	The ES should clearly describe how environmental data collected in all phases, will be shared with the relevant Local Environmental Records Centre(s) and any relevant environmental recording schemes, in line with best practice, and how this will be secured through the DCO.

3.5 Geology, peat and soil

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Tables 10.3 and 17.2	Cumulative effects on geology, soil and peat	The Scoping Report seeks to scope out cumulative effects on geology, soils and peat. This is on the basis that effects on soils, peat and geology are localised and site specific. The Scoping Report states there are no pathways for interaction with effects arising from other developments. On this basis, the Inspectorate agrees that cumulative effects on geology, soil and peat may be scoped out.

ID	Ref	Description	Inspectorate's comments
352	Paragraph 10.1 and figure 10.1	Study area	The Scoping Report states that the study area for this aspect comprises both the turbine area and the cable corridor and that this is shown on Figure 10.1. However, figure 10.1 only depicts the turbine area. The ES should ensure that the full study area, which includes the cable corridor, is depicted.
353	Table 10.3	Deep peat	The Scoping Report states that an assessment of impacts on deep peat (peat greater than 0.4m in depth) will be included in the ES. However, the Inspectorate expects the ES to include an assessment of impacts to peat at all levels. Relevant cross references should be made to the water resources and hydrology and climate change chapters. The applicant's attention is drawn to comments from Natural England and Northumberland National Park Authority (appendix 2 of this Scoping Opinion) in this regard.
354	Table 10.3	Unexploded ordnance	The Scoping Report states that a preliminary desk study assessment will be undertaken regarding UXO risk. If UXO is found, the ES should provide an assessment which considers the potential for likely significant effects on soils, as well as human and ecological receptors, with cross references to other chapters of the ES as necessary. The

ID	Ref	Description	Inspectorate's comments
			applicant's attention is drawn to the consultation response from Natural England (appendix 2 of this Scoping Opinion) in this regard.
355	N/A	Impacts on peat	The ES should consider the potential for the construction, operation and decommissioning of the proposed development to change habitat presence and composition, for example, as a result of the dewatering of peat. Appropriate cross references to the ecology chapter should be included as the ES should consider hydrological impacts on peatland habitats at areas such as the Ottercops and Tocraggs Mosses. The ES should detail any necessary mitigation/compensation measures which may be required to account for loss and/or damage to peatlands and explain how any mitigation measures will be secured in the DCO. The applicant's attention is drawn to the consultation response from Natural England (appendix 2 of this Scoping Opinion) in this regard.
356	N/A	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Efforts should be made to avoid and minimise temporary and permanent loss of BMV land. The use of BMV land should also be included within the applicant's discussion of alternatives.

3.6 Water resources and flood risk

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 11.2	Impacts on designated sites	The Scoping Report seeks to scope this matter out on the basis that there are no designated sites within the study area. However, as discussed in ID 3.4.12, New Scroggs SSSI is located within the cable corridor options area. The Scoping Report does not explain whether there are any sites which have potential for hydrological connectivity. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
362	Paragraph 11.1 and figure 11.1	Study area	Paragraph 11.1 states that the study area for water resources and flood risk for the turbine area includes a 1km buffer zone. The study area for the cable corridor options does not have a buffer zone. No justification is provided for the cable corridor options study area not requiring a buffer zone. The Inspectorate considers that activities which will take place in the cable corridor option areas may have impacts on water resources and flood risk. The ES should justify why a buffer zone for the cable corridor options study area is not included. The ES should also provide an assessment of all activities which may result in significant effects to water resources.
363	Section 2.3	Impacts from heat	The grid connection option is yet to be finalised. In the event that the cable is buried, the ES should assess potential for thermal impact of cabling on groundwater. The

ID	Ref	Description	Inspectorate's comments
			applicant's attention is drawn to comments from the Environment Agency (appendix 2 of this Scoping Opinion) in this regard.
364	Paragraph 2.4.2 and 16.8.3	Firewater at the BESS	The Scoping Report states that BESS can, in rare circumstances, be associated with fire risk. It states that risks can be engineered out through appropriate design and safety systems. The ES should provide full details the safety systems and design measures. Furthermore, the ES should include information regarding how firewater would be managed to prevent adverse impacts to water resources in the event of a fire. The applicant's attention is drawn to the consultation response from the Environment Agency (appendix 2 of this Scoping Opinion) in this regard.
365	Sections 11.2.2.2. and 11.5.2	Flood Risk Assessment (FRA)	The Scoping Report states that a FRA will be provided as an appendix to the ES but no further details are provided. The applicant's attention is drawn to comments from Northumberland County Council (appendix 2 of this Scoping Opinion) with regards to factors which should be included in the FRA, such as, an assessment of groundwater flood risk and including consideration of a 1 in 100 year plus climate change event.
366	Paragraph 11.3.3.1	Private water supplies (PWS)	The Scoping Report states that Northumberland County Council will be contacted to identify PWS within the study area. Northumberland County Council in its response to the Scoping Report (see appendix 2 of this Scoping Opinion) states there is at least one PWS near the boundary of the proposed development. The applicant's attention is also drawn to the response from Elsdon Parish Council (appendix 2 of this Scoping Opinion) who identify private boreholes for at least four properties. The ES should ensure that all PWS are identified in order for a robust assessment of impacts may be made.

3.7 Access, traffic and transport

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Paragraph 12.4.2.1 and tables 12.5 and 17.2	Operational traffic	The Scoping Report proposes to scope this matter out on the basis that operational traffic is limited to general maintenance and site monitoring visits which is estimated to be one visit per day on average. The Inspectorate agrees that this matter can be scoped out, provided that the frequency, type of trips, and vehicle types generated during the operational phase would not trigger thresholds for likely significant effects within guidance from the Institute of Sustainability and Environmental Professionals (ISEP). The applicant should also refer to the total change threshold to support the assertion that changes would not be significant.
37.2	Paragraph 12.4.2.2 and tables 12.5 and 17.2	Air quality	The Scoping Report proposes to assess air quality in the 'Other Issues' section of the ES. The Inspectorate agrees with this approach, however, paragraph 16.5.6 of the Scoping Report states that traffic related air quality effects are addressed in chapter 12: Access, Traffic and Transport, so it is unclear whether traffic related air quality effects will be assessed fully in the access, traffic and transport chapter or other issues chapter. For clarity, the ES should clearly signpost where this is assessed in the ES.

ID	Ref	Description	Inspectorate's comments
37.3	Paragraph 12.3.2.2	Construction access routes and cable corridor options	A detailed access strategy of the cable corridor options has not yet been defined. Access to the works area of the corridor is anticipated via a series of temporary construction access points. The Scoping Report does not explain how the impact of the construction of the access routes and cable routes will be assessed individually

ID	Ref	Description	Inspectorate's comments
			and cumulatively. An assessment should be provided of the traffic impacts of these in the ES.
374	Paragraph 12.5.3	Abnormal Load Route Assessment (ALRA)	The Inspectorate notes that an ALRA will be undertaken to assess the suitability of the road network, and that impacts associated with AIL are scoped into the ES. This should include consideration of potential cumulative effects on the road network with other committed and proposed developments.
375	N/A	Operational traffic – components replacement trip generation	The Scoping Report does not provide any information on any need for the replacement of wind turbine and associated infrastructure. An assessment of operational traffic should be provided in the ES if components replacement has the potential to be required during the operational phase.

3.8 Noise and Vibration

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Paragraph 13.4.2.1 and tables 13.2 and 17.2	Assessment of infrasound and low frequency noise	The Scoping Report proposes to scope this matter out on the basis that literature studies show infrasound and low frequency noise from wind turbines would not cause adverse health effects. The Scoping Report does not confirm whether other elements of the proposed development such as the substation, could generate low frequency noise and/or infrasound. The Inspectorate considers that this should be confirmed in the ES and an assessment provided where significant effects are likely to occur. The ES should also consider the potential of significant effects from components cumulatively.
38.2	Paragraph 13.4.2.2 and tables 13.2 and 17.2	Assessment of amplitude modulation (AM)	The Scoping Report proposes to scope this matter out on the basis that there is a lack of industry-wide methodology for the assessment of AM. However, this is not, in itself a reason to scope this matter out. The Inspectorate does not agree to scope this matter out at present, on the basis that a final layout is not known at this stage. The applicant is encouraged to discuss this matter with the relevant consultation bodies to seek further agreement to scope it out, should it be demonstrated that significant effects are unlikely.
38.3	Paragraph 13.4.2.3 and tables 13.2 and 17.2	Operational vibration	The Scoping Report proposes to scope this matter out on the basis that ground born wind turbine vibration would not be perceptible at the closest vibration sensitive receptor (approximately 500m to the closest turbine). The Scoping Report does not define whether sensitive receptors include ecological receptors. The Scoping Report also does not refer to any vibration from other sources including the BESS and machinery. The ES should consider vibration from all sources and on both human and ecological receptors unless it can be demonstrated that such effects

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			would not be significant, with agreement from the relevant consultation bodies where possible.
384	Paragraph 13.4.2.4 and tables 13.2 and 17.2	Construction and decommissioning vibration	The Scoping Report proposes to scope this matter out on the basis that vibration inducing activities such as piling or compacting are not expected to take place in the proximity of vibration sensitive receptors. However, the Inspectorate notes that construction blasting may be required for rock extraction at borrow pits. There is little information in the Scoping Report regarding where blasting activities would take place and no information on machinery to be used has been provided. The Inspectorate considers that both noise and vibration impacts from blasting on human and ecological receptors should be considered in the ES. Where LSE may occur, the ES should include mitigation measures and how they would be secured in the DCO. See comments at ID 2.0.7 regarding decommissioning.
385	Paragraph 13.4.2.5 and tables 13.2 and 17.2	Operational underground cable route noise	The Scoping Report proposes to scope this matter out on the basis that the underground cable is not anticipated to generate significant noise. The Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
386	Paragraph 13.4.2.6 and tables 13.2 and 17.2	Operational traffic noise	The Scoping Report proposes to scope this matter out on the basis that operational traffic is expected to be minimal. The Inspectorate agrees to scope this matter out on the basis that operational traffic movements are likely to be infrequent and unlikely to give rise to likely significant effects.

ID	Ref	Description	Inspectorate's comments
38.7	Paragraph 13.3.2	Sensitive receptors	The Scoping Report states that ecological receptors will be assessed separately within the ecology chapter and users of Public Rights of Way (PRoW) will not be considered as noise or vibration sensitive receptors for the purposes of the operational noise assessment. The Inspectorate notes the ecological receptors will be assessed in the ecology chapter. The ES should ensure that it identifies sensitive receptors in line with Institute of Environmental Management and Assessment "Guidelines for Environmental Noise Impact Assessment" 2014 or explain why the methodology has departed from this. This should include consideration of open-air amenities, such as PRoW. The ES should also consider if there are any cultural and heritage receptors that require consideration in respect of noise and vibration related impacts. The applicant should seek agreement on any cultural and heritage receptors from relevant consultation bodies and cross-reference to the relevant chapters within the ES.

3.9 Climate change and greenhouse gas emissions

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
391	Tables 14.7 and 17.2	Consideration of sea level rise and sea temperature rise within the climate change risk assessment (CCRA).	The Scoping Report seeks to scope out consideration of sea level rise and sea temperature rise within the CCRA because there is no marine infrastructure and the proposed development is not expected to be impacted. The Inspectorate agrees with this approach and therefore this matter may be scoped out of the ES.
392	Paragraph 14.5.1	Downstream greenhouse gas (GHG) emissions.	The Scoping Report seeks to scope out downstream GHGs on the basis that downstream emissions are focused on fossil fuels and the future use of the electricity generated by the proposed development would not produce further GHG emissions. The Inspectorate consider that it is beyond the ability of the ES to meaningfully assess how electricity generated by the proposed development will be used by end users, and therefore what downstream GHGs may be emitted as a consequence. The Inspectorate therefore agrees with this approach and this matter may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
393	Paragraph 14.3.1	Future baseline	The Scoping Report states: "The future baseline is the net change in GHG emissions between the existing baseline and the Proposed Development." The Inspectorate notes that the ES is required to outline the likely evolution of the baseline environment without implementation of the development. This is commonly described as the 'future baseline' scenario.

ID	Ref	Description	Inspectorate's comments
394	Paragraphs 14.5.2 and 16.8.6 and tables 14.7 and 17.2	Scope of climate change hazard consideration	The climate change chapter of the Scoping Report seeks to scope in consideration of extreme weather events, changes in precipitation, changes in temperature, wind and wildfires into the CCRA because it is considered that these hazards have the potential to impact the proposed development. This appears to contradict the major hazards and disasters chapter, which seeks to scope out the proposed development's vulnerabilities and resilience to natural disasters related to climate change (with the exception of increased windstorms and wildfires) as it considers that none of the identified climate change trends are likely to significantly affect the proposed development. The ES should ensure consistency between aspect topics regarding matters to be scoped in and out of assessment.
395	Tables 14.2, 14.7 and 17.2	Wildfire	See comments at ID 3.15.1 regarding the risk of fire caused by the proposed development's infrastructure.
396	N/A	Long term impacts	Should there be any possibility that turbine foundations or any other components could be left in situ after decommissioning, the ES should assess the likely significant effects that could arise as a result.

3.10 Socio-economics, tourism and recreation

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Tables 15.6 and 17.2	Wider socio-economic effects during operation	The Scoping Report states that, given operational employment is expected to be relatively small, significant knock-on effects for other sectors are not likely to be significant. The Inspectorate agrees this may be scoped out of the ES, though the precise levels of operational employment should be set out clearly in the ES.
3.10.2	Tables 15.6 and 17.2	Socio-cultural effects during operation	The Scoping Report states that operational employment is unlikely to cause significant effects with respect to local demographics, demand for services or pressure on social infrastructure. The Inspectorate agrees this may be scoped out of the ES.
3.10.3	Tables 15.6 and 17.2	Direct impacts on PRow, tourism or social infrastructure during operation	The Scoping Report states that long-term effects arising during construction and continuing into operation would be assessed as construction effects, and that new or direct impacts are not expected to arise during operation. The Inspectorate agrees this may be scoped out of the ES.
3.10.4	Tables 15.6 and 17.2	Housing and accommodation effects during operation	The Scoping Report states that, given operational employment is expected to be relatively small, knock-on effects for housing and accommodation demand on the local housing and renting market are not expected to be significant. The Inspectorate agrees this may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
	N/A	Hadrian's Wall Path National Trail	The Scoping Report makes no mention of the Hadrian's Wall Path National Trail. The ES should consider the potential impacts upon this National Trail, alongside any access land, common land and other relevant public rights of way.

3.11 Other issues – telecommunications and utilities

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Paragraphs 16.2 and 16.2.3	An assessment of the effect of the grid connection infrastructure on telecommunications / radio signals	The Scoping Report seeks to scope out the grid connection infrastructure given that it is a static and relatively narrow feature, with limited potential to interact with radio signals. The effect of the wind turbines will be scoped into the assessment. The Inspectorate agrees that impacts from the grid connection infrastructure on infrastructure and telecommunications / radio signals may be scoped out of the ES.
3.11.2	Paragraph 16.2.4	Field surveys	The Scoping Report seeks to scope out field surveys for utilities on the basis that the information required will be gained from desk-based assessment work. The Inspectorate agrees to scope out field surveys for utilities from the ES.
3.11.3	Paragraph 16.2.6 and table 17.2	Utilities	The Scoping Report seeks to scope out utilities, given that any potential interactions with utility infrastructure is expected to be addressed through design avoidance and construction phase controls, informed by desk-based asset searches and consultation with statutory undertakers. At this stage, no information has been provided to identify the location of utilities relative to the proposed development site. The Inspectorate does not yet agree to scope this matter out, given that the potential diversion of utilities may result in likely significant effects. The ES should identify the location of utilities and provide an assessment where likely significant effects may occur.

ID	Ref	Description	Inspectorate's comments
3.11.4	N/A	N/A	N/A

3.12 Other issues - aviation

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Tables 16.3.6 and 16.7	Impacts on aerodromes	The Scoping Report states that there are no licensed or unlicensed aerodromes lie within relevant safeguarding distances, and no Obstacle Limitation Surfaces or Instrument Flight Procedure protection surfaces are intersected. No credible impact pathway exists; therefore, this topic is scoped out. On this basis, the Inspectorate agrees that impacts on aerodromes may be scoped out of the ES.
3.122	Tables 16.7 and 17.2	Impacts on meteorological radar	The Scoping Report states that the proposed development lies outside Met Office radar safeguarding distances, and no impact mechanism exists. On this basis, the Inspectorate agrees that impacts on meteorological radar may be scoped out of the ES.
3.123	Tables 16.7 and 17.2	Impacts on airspace and instrument flight procedures	The Scoping Report states that the proposed development is located outside controlled airspace structures and published IFP protection zones. No interaction with airspace procedures is expected. On this basis, the Inspectorate agrees that impacts on airspace and instrument flight procedure may be scoped out of the ES.
3.124	Tables 16.7 and 17.2	Aviation lighting	The Scoping Report states that aviation lighting requirements will be identified through the aviation assessment and any landscape and visual impacts will be assessed in Chapter 6 (Landscape and visual) of the ES. The Inspectorate is content with this approach. However, the ES should explain the relationship of the aviation assessment to the ES and any lighting requirements required for the proposed development should be clearly set out in the ES.

ID	Ref	Description	Inspectorate's comments
3.125	Section 16.3.2	Baseline	The Scoping Report identifies several relevant aviation receptors, including Spadeadam Air Traffic Control (ATC). The applicant's attention is drawn to comments from the Ministry of Defence (appendix 2 of this Scoping Opinion) which identifies an ATC radar at Spadeadam Berry Hill and another ATC radar at Spadeadam Deadwater Fell. The ES should ensure that all relevant receptors are clearly identified, even those located geographically close to each other.

3.13 Other issues – shadow flicker

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Section 16.4.4	Shadow flicker – construction	The Scoping Report highlights that shadow flicker is present when turbines are operational and therefore the Inspectorate is content to scope this matter out of the construction phase assessment. In scoping this matter out, the applicant should however consider the potential for any likely significant effects towards the end of the construction period should the proposed development begin to be incrementally operational. This should be confirmed in the ES.
3.13.2	Section 16.4.4	Shadow flicker – decommissioning	The Scoping Report highlights that shadow flicker is present when turbines are operational and therefore the Inspectorate is content to scope this matter out of the decommissioning phase assessment providing all turbines have ceased operation.
3.13.3	Section 16.4.5	Impacts on properties beyond 10 times the rotor diameter	The Scoping Report seeks to scope out impacts on potential receptors (predominantly residential properties) which are located beyond a distance equal to ten times the rotor diameter from the turbine locations. At this range, it is stated that shadow flicker effects will not occur. On this basis, the Inspectorate agrees that impacts beyond a distance equal to ten times the rotor diameter from the turbine locations may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.13.4	N/A	N/A	N/A

3.14 Other issues – human health

(Scoping Report Section 16)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.14.1	Table 17.2 and paragraph 16.7.6	Standalone human health chapter	The Scoping Report seeks to scope out human health as a standalone chapter within the ES. It states that human health effects will be covered within the following chapters: Geology and Peat; Water Resources and Flood Risk; Access, Traffic and Transport; Noise and Vibration; Climate Change and Carbon Balance; and Socio-Economics, Tourism and Recreation. Whilst not listed in paragraph 16.7.6 or table 17.2, paragraph 16.7.3 notes that the Landscape and Visual Impact Assessment chapter will also consider effects on mental health and wellbeing. The Inspectorate is content that a standalone assessment on human health is not required. The ES should, however, clearly signpost where impacts relating to all relevant aspects of physical and mental health have been considered in the relevant technical chapters. The following information must be made clear within each technical chapter: a summary of any key findings, risk assessments (where appropriate), proposed mitigation measures, conclusions and residual impacts relating to human health. It must be clear how the proposed development complies with the requirements of National Policy Statements and relevant guidance and standards relating to human health.

ID	Ref	Description	Inspectorate's comments
3.14.2	Paragraph 16.7.4	Guidance and standards	The Scoping Report states: "The proposed methodology will be prepared in line with guidance and standards listed in 0." It should be made clear within each ES chapter which relevant guidance and standards are utilised to inform the methodology applied.

3.15 Other issues – major accidents and disasters

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Paragraphs 16.8.3 and 16.8.6 and table 16.7	Risk from windstorms and wildfires caused by infrastructure failure	Paragraph 16.8.6 of the Scoping Report notes that there is an increased risk of wildfire caused by infrastructure failure and windstorm due to climate change and states that these risks could be addressed through embedded mitigation and operational controls. Paragraph 16.8.3 of the Scoping Report also states that BESS can be associated with fire risk, though states that this can be mitigated through appropriate design and safety systems. However, there is limited information regarding mitigation measures provided in the Scoping Report. In addition to the above, potential wildfire risk to the surrounding upland moorland and afforested landscape arising from the proposed development is highlighted by the Northumberland National Park Authority (appendix 2 of this Scoping Opinion). On this basis, the Inspectorate does not agree to scope this matter out at this time. The ES should seek to include this assessment, consult with relevant consultation bodies, secure mitigation if required and demonstrate that significant effects are unlikely before scoping this matter out. Any likely significant effects from the risk from windstorms and wildfires caused by infrastructure failure and other causes such as human activities should be addressed in the ES. Details of measures to minimise impacts on the environment in the event of such an occurrence should be described.
3.15.2	Paragraph 16.8.6	Risks relating to health and safety	The Scoping Report states that major accidents and disasters relating to health and safety can be proportionately addressed through embedded mitigation and compliance with health and safety legislation and therefore proposes to scope this out of the ES. However, the Inspectorate does not consider that enough information is provided to scope this matter out at this stage. The ES should explain potential impacts and any necessary mitigation measures and how they would be secured in the DCO.

3.153	Paragraph 16.8.6	Risks associated with accidental leaks/spills	The Scoping Report seeks to scope out impacts from accidental leaks/spills of oil, fuel, chemicals and wastes from an assessment of major accidents and disasters as it states that this will be covered in the water resources and flood risk chapter. The Inspectorate agrees this may be assessed in the water resources and flood risk chapter of the ES.
3.154	Paragraph 16.8.6	Hurricanes, tornadoes and volcanoes.	As the location of the proposed development is not known for hurricanes, tornadoes and volcanoes, the Inspectorate agrees these may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.155	N/A	N/A	N/A

3.16 Other issues – air quality

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Paragraph 16.5.6 and tables 16.7 and 17.2	Emissions from construction traffic	The Inspectorate considers that insufficient information has been provided on expected vehicle movements and proposed construction routes to scope this matter out at this stage. The ES should include an assessment of the LSE of construction traffic emissions on human and ecological receptors, or otherwise present a justification in the ES as to why significant effects are not likely to occur, with reference to the expected vehicle movements and the relevant Environment Protection UK (EPUK)/ Institute of Air Quality Management (IAQM) thresholds.
3.16.2	Paragraphs 16.5.5 and 16.5.6 and table 16.7	Construction phase plant and Non-Road Mobile Machinery (NRMM) air quality effects	The Scoping Report proposes to scope out an assessment of emissions from NRMM during the construction phase on the basis that standard good-practice mitigation would be implemented via the outline Construction Environmental Management Plan (oCEMP). The Inspectorate agrees that this matter can be scoped out for human receptors, on the basis that sufficient information is provided to demonstrate no likely significant effects and the site management controls, and mitigation are secured, to support this conclusion. The ES should however include an assessment of NRMM emissions during construction which are likely to result in significant effects to ecological receptors. The ES should also include information on whether back-up generators are proposed within the assessment in order to make a comprehensive assessment of any impacts.
3.16.3	Paragraph 16.5.6 and table 16.7	Construction dust effects	The Scoping Report proposes to scope out an assessment of dust emissions during the construction phase on the basis that a construction dust risk assessment would be

			undertaken to determine the risk of dust impacts to human receptors and identify appropriate mitigation measures that would be incorporated into the oCEMP. The Inspectorate agrees this matter can be scoped out for human receptors on the basis that the mitigation measures outlined in the oCEMP are expected to ensure that any impacts on human receptors would not be significant. However, considering the proximity of designated sites and the limited information about construction processes provided in the Scoping Report, the Inspectorate does not agree to scope out this matter for ecological receptors. The ES should include an assessment of dust emissions during construction which are likely to result in significant effects to ecological receptors. The assessment should demonstrate that the proposed dust suppression measures provide adequate mitigation for impacts to designated sites within 200m of the works and would result in no significant change from the baseline. It should be clear how all mitigation measures would be delivered and secured, through cross reference to the oCEMP and DCO.
3.164	Paragraph 16.5.6 and table 16.7	Operational emissions	The Inspectorate is content that the operation of wind turbines and associated infrastructure is unlikely to result in significant effects on air quality and operational traffic is expected to be minimal. The Inspectorate agrees agree that this matter can be scoped out of further assessment.
3.165	Paragraph 16.5.6 and table 16.7	Decommissioning	See comments at ID 2.0.7 regarding decommissioning.

ID	Ref	Description	Inspectorate's comments
3.166	N/A	Guidance	The Applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.

3.16.7	Paragraph 16.5.2	Sensitive receptors	The Scoping Report states that sensitive receptors relevant to air quality include residential properties and community facilities located along potential construction traffic routes. The ES should also assess the potential for likely significant effects relating to air quality on ecological receptors located proximity to the site and along potential construction traffic routes. The applicant should seek agreement on the sensitive receptors with relevant consultation bodies.
3.16.8	N/A	Risk from landfill gas	The Environment Agency in its consultation response (appendix 2 of this Scoping Opinion) highlights that a number of known closed landfill sites are located within the cable corridor options. The ES should include an assessment to identify any potential risk to the proposed development from landfill gas, and any risks to human and ecological receptors. Any necessary mitigation measures and how they would be secured in the DCO should be documented.

3.17 Other issues – forestry

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.17.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.172	Paragraph 16.6.4	Veteran and notable trees	The methodology set out for the forestry assessment does not refer to identification of veteran trees. The studies undertaken to inform the ES should ensure that veteran trees which may be affected by the proposed development are identified. The ES should also ensure that the ecological connectivity of ancient woodland and woodland habitats is considered. Veteran and notable trees which may be affected by the turbine area, or cable corridor options areas should be identified, mapped and assessed. The applicant's attention is drawn to comments from the Forestry Commission (appendix 2 of this Scoping Opinion), in this regard).

3.18 Other issues – inter project cumulative

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.18.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.182	Paragraph 16.9.4	Cumulative assessment	The Scoping Report provides a very high-level outline of the cumulative assessment. The ES should ensure that the cumulative assessment includes all relevant developments and proposals not solely other wind farm developments.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Simonburn Parish Council
	Chollerton Parish Council
	Kirkwhelpington Parish Council
	Corsenside Parish Council
	Bavington Parish Council
	Humshaugh Parish Council
	Birtley Parish Council
	Newbrough Parish Council
	Elsdon Parish Council
	Rothley with Hollinghill Parish Council
	Warden Parish Council
	Otterburn Parish Council
	Bardon Mill Parish Council
	Wark Parish Council
	Bellingham Parish Council
	Hexham Town Council
	Acomb Parish Council
	Wall Parish Council
	Whittington Parish Council
	Capheaton Parish Council
	Wallington Demesne Parish Council
	Netherwitton Parish Council
	Nunnykirk Parish Council
	Brinkburn & Hesleyhurst Parish Council
	Hepple Parish Council
	Whitton and Tosson Parish Council
	Haydon Parish Council
	Henshaw Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	The Forestry Commission - Yorkshire and North East

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant Highways Authority	Highways Department for Northumberland County Council
	National Highways
The Civil Aviation Authority	UK Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Police and Crime Commissioner for Northumbria
The relevant ambulance service	North East Ambulance Service NHS Foundation Trust
The relevant fire and rescue authority	Northumberland Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS North East and North Cumbria Integrated Care Board
NHS England	NHS England
The relevant NHS Foundation Trust	North East Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding

STATUTORY UNDERTAKER	ORGANISATION
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	Environment Agency
The relevant water and sewage undertaker	Northumbrian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity distributor with CPO Powers	Northern Powergrid (Northeast) Limited
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Grid Line Power Networks
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Sphere Energy Connect Ltd
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)
	SP Transmission Plc

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Northumberland County Council
Cumberland Council
Westmorland and Furness Council
Durham County Council
Gateshead Council
Newcastle City Council
Northumberland National Park
North Tyneside Council
Scottish Borders Council

TABLE A4:: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
North East Combined Authority

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Bavington Parish Council
Bellingham Parish Council
Brinkburn and Hesleyhurst Parish Council
Corsenside Parish Council
Cumberland Council
Durham County Council
Elsdon Parish Council
Environment Agency
Forestry Commission - Yorkshire and North East
Gateshead Council
Health and Safety Executive
Historic England
Kirkwhelpington Parish Council
Ministry of Defence
NATS En-Route Safeguarding
Natural England
Northern Gas Networks Limited
Northumberland County Council
Northumberland National Park
SP Transmission PLC
The Coal Authority
UK Civil Aviation Authority
UK Health Security Agency

From: claire miller <clerk@bavingtonparishcouncil.org>

Sent: 07 May 2026 20:55

To: Ray II Wind Farm <RayIIWindFarm@planninginspectorate.gov.uk>

Subject: Re: EN0110031 - Ray II Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification

Thankyou for the correspondence.

i can confirm that Bavington Parish Council do not have any comments.

Kind regards

Claire Miller, Clerk

Bavington Parish Council

From: Bellingham Parish Clerk <clerk@bellinghamparishcouncil.gov.uk>

Sent: 03 June 2026 12:33

To: Ray II Wind Farm <RayIIWindFarm@planninginspectorate.gov.uk>

Subject: Re: EN0110031 - Ray II Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification

Ray II Wind Farm (EN0110031) — Scoping Consultation Response: Bellingham Town Council

Dear Ms Wilkinson,

Thank you for consulting Bellingham Town Council as part of the scoping process for the Ray II Wind Farm application (ref: EN0110031).

We wish to engage constructively with this process and ask that the following matters are addressed fully within the Environmental Statement.

Large soaring birds

We ask that the ES includes targeted survey work for osprey and golden eagle, both of which are Schedule 1 species under the Wildlife and Countryside Act 1981 and both of which are present or increasingly sighted in this part of Northumberland. Ospreys have been actively supported and encouraged in the Kielder area, and golden eagle sightings in the county are becoming more frequent. Turbines at the proposed height of up to 230m to blade tip present a known collision risk for large soaring birds, and we ask that survey methodology addresses this specifically, rather than treating these species within a general bird assessment.

Wildcat reintroduction

A wildcat reintroduction programme is actively underway in this region. While the species is not yet established in the area immediately surrounding the proposed development, the site sits within terrain that could form part of future wildcat habitat. We ask that the ES considers whether the development would compromise the prospects for wildcat recovery in this landscape.

Tree felling and woodland impact

We ask that the ES assesses any tree felling required to accommodate turbines, access tracks, cabling or other associated infrastructure as an integral part of the development's ecological impact, rather than treating it as a peripheral or separate matter.

Bats

Bat mortality at wind turbines is well documented. We ask that the ES includes thorough bat survey work across all relevant seasons, with methodology that addresses activity at rotor-sweep height and not only at ground level.

Cumulative landscape and visual impact

We ask that the ES assesses the cumulative visual impact of Ray I and Ray II together across key viewpoints, including public rights of way and residential properties within the town and surrounding area.

We reserve the right to comment more fully on the proposals themselves when the application is brought forward for consultation.

Yours sincerely,

Christine Woodcock
Bellingham Parish Clerk

As this role is part time, there may be a short delay responding to correspondence. We appreciate your patience.



From: Brinkburn <clerk@brinkburn-pc.gov.uk>

Sent: 04 June 2026 14:43

To: RayIIWindFarm@planninginspectorate.gov.uk.

Subject: Ray II Wind Farm Scoping Consultation - Brinkburn & Hesleyhurst Parish Council Concerns

Subject: Ray II Wind Farm Scoping Consultation – Brinkburn & Hesleyhurst Parish Council Concerns

Dear Planning Inspectorate Case Team,

I am writing on behalf of Brinkburn and Hesleyhurst Parish Council in relation to the proposed Ray II Wind Farm and associated grid connection. We would be grateful if the following concerns could be considered at the scoping stage, so that the Environmental Statement fully addresses the likely significant effects of the project on local communities and the surrounding environment.

Our principal concern is the scale of the proposed development, including turbines of up to 230 metres in height, and the resulting landscape and visual effects. The development has the potential to alter views from nearby villages, isolated dwellings, public roads including the A696, and surrounding high ground. The implications of aviation lighting should also be assessed carefully, particularly in relation to dark skies and night-time visual effects.

We also consider that the Environmental Statement must contain robust assessment of ecological, ornithological, peat, and hydrological impacts. The site and surrounding area include peat soils, bogs, burns, and habitats that may support sensitive species including curlew, hen harrier, merlin, and bats, as well as designated sites in the wider area. The assessment should address direct, indirect, and cumulative effects on these receptors and clearly explain the evidence base, including peat depth surveys and hydrological connectivity.

Traffic and construction impacts are another significant concern. Given that the A696 appears to be the main construction access route, the assessment should set out the likely volume of HGV and abnormal load movements, any road widening or highway works required, and the implications for road safety, residential amenity, and day-to-day movement in the area. Noise effects should also be assessed fully, including predicted levels at the nearest homes and the treatment of issues such as amplitude modulation where relevant.

In addition, we ask that the grid connection options are assessed transparently, including the comparative effects of overhead, underground, and hybrid solutions and

the reasons for the preferred approach. It is also essential that cumulative effects are assessed comprehensively, including the combined impact of Ray Wind Farm, Ray II, Green Rigg, and related infrastructure.

We are particularly concerned by the suggestion that certain air quality impacts, traffic impacts, ecological receptors, and noise scenarios may be scoped out. In our view, any such exclusions should only be accepted where they are supported by clear and compelling evidence. We therefore ask that the scoping process adopts a precautionary approach and ensures that potentially significant local effects are not excluded from detailed assessment without proper justification.

We would welcome confirmation that these matters will be considered in the scoping opinion and reflected in the scope of the Environmental Impact Assessment. Thank you for your attention to these concerns.

Yours faithfully,

Garth Rhodes

Parish Clerk

Brinkburn & Hesleyhurst Parish Council

5 Wardle Terrace

Longframlington

Morpeth

Northumberland

NE65 8AB

Telephone: [REDACTED]

Mobile: [REDACTED]

Email: clerk@brinkburn-pc.gov.uk

From: Karen & Carl Hamilton [REDACTED]@yahoo.co.uk>
Sent: 18 May 2026 17:05
To: Ray II Wind Farm <RayIIWindFarm@planninginspectorate.gov.uk>
Subject: Ray II Wind Power Station - Environmental Statement Response

You don't often get email from [REDACTED]@yahoo.co.uk. [Learn why this is important](#)

Dear Ms Wilkinson,

Thank you for consulting **Corsenside Parish Council** as part of the Environmental Statement scoping process for the Ray II Wind Farm application (ref: EN0110031).

We wish to engage constructively with this process and ask that the following matters are addressed fully within the Environmental Statement.

Cumulative landscape and visual impact

Corsenside is an open, sparsely settled rural parish in which the wider landscape character is central both to residents' quality of life and to the area's value as a visitor destination. The existing Ray Wind Farm is already visible from many parts of the parish and beyond. We ask that the ES assesses the visual impact of Ray II across a range of key viewpoints including residential properties in the three villages of West Woodburn, Ridsdale and East Woodburn, outlying residential properties and farmhouses, public rights of way, and the parish's public open spaces. We also ask that the ES assesses the cumulative visual impact of Ray I and Ray II together along with the Green Rigg windfarm development. We also ask that the ES considers the effect of the development on the character of the area as a tourism destination, given that the local economy depends significantly on this largely driven by the perception that this part of Northumberland is wild, open, remote and undeveloped. Indeed, a lot can be learned from the slogan used by the tourist organisation 'Visit Northumberland' and Northumberland County Council, "**Live it. Love it. Leave it unspoilt**".

Noise impact

Given the proposed turbine height of up to 230m to blade tip, we ask that the ES models noise (including low-frequency noise) at residential properties across the parish, not only those immediately adjacent to the site.

Shadow flicker

Given the proposed size of the turbines and the proximity of the proposed development area to Corsenside we ask that the issue of shadow flicker causing strobing light due to the rotation of the turbine blades is assessed from residential properties within the three villages of the parish West Woodburn, Ridsdale and East Woodburn and also the more isolated residential properties and farms within the parish.

Wildlife connectivity

We ask that the ES assesses the potential impact of the development on mammal movement and landscape-scale connectivity through this area. There is a credible and growing ambition to support wildlife dispersal between the Kielder forest block and land further south including the Wallington Estate, and the Ray II site sits within terrain relevant to that corridor. We ask specifically that the ES includes baseline survey work for pine marten, red squirrel and other species sensitive to habitat fragmentation, and that it assesses the effect of access tracks, fencing and lighting on ground-level movement routes, not only the turbine footprint itself.

Bats

Bat mortality at wind turbines is well documented. We ask that the ES includes thorough bat survey work across all relevant seasons, and that survey methodology addresses activity at rotor-sweep height, not only at ground level.

Amphibians and reptiles

We ask that the ES considers the impact of the construction and ongoing servicing of the proposed development on the amphibians and reptiles which may be present within the area. Corsenside and the wider Redesdale valley in Northumberland offer excellent, unspoiled habitats for native UK amphibians. The clean waters of the River Rede and its surrounding moorlands, bogs, and forestry act as strongholds for these. Common Frogs (*Rana temporaria*) are highly widespread and frequent damp terrestrial habitats. Common Toads (*Bufo bufo*) thrive in Redesdale, and are known to navigate up to a kilometre to ancestral breeding ponds. The Palmate Newt (*Lissotriton helveticus*) is the most common newt in upland areas, frequently found in small pools along the burns and mires. Smooth Newts (*Lissotriton vulgaris*) are also present, typically using river valleys and permanent ponds for breeding. Great Crested Newt (*Triturus cristatus*)

Britain's largest and most protected newt are found in the wider region and may be present within the development area but are strictly protected by law.

The Adder (*Vipera berus*), Grass Snake (*Natrix natrix*), Slow Worm (*Anguis fragilis*) and the Common or Viviparous Lizard (*Zootoca vivipara*) are all common to the North East of England and may be found within the proposed development site.

Indigenous birds and migratory birds

Wind turbines affect birds primarily through three mechanisms: direct collision with rotating blades, habitat loss during construction, and displacement from feeding or breeding areas due to avoidance behaviour. We are fortunate in Corsenside to have an existing rich and diverse avian population with good potential for the return of the Golden Eagle. We ask that the ES consider the impact on our local avian population to include indigenous and migratory birds.

Mammals

Wind turbines are known to have two major impacts on mammalian populations.

Displacement & Habitat Loss: Over 65% of terrestrial mammals exhibit avoidance behaviours, sometimes displacing themselves up to 5km from wind developments. For example, studies on some mammalian species show that turbines lead to altered migration paths, shifts in denning sites, and lowered reproductive rates.

Physiological Stress: Continuous low-frequency noise and vibration can induce stress. Studies on small mammals, like the common vole, indicate increased stress hormones (corticosterone) in individuals living close to wind farms compared to those in unaffected control areas.

We ask that the ES considers the impact on mammalian populations within the proposed development area.

Insects

We ask that the ES considers the impact on insects as it is known that wind turbines impact insects primarily by causing direct fatalities through mechanical strikes and acting as "ecological traps" that attract flying insects due to ambient heat, bright colours, and flashing lights.

Research indicates several key pathways and consequences regarding how wind turbines interact with insect communities.

1. Direct Mortality:

- **Trillions of Strikes:** Studies estimate that hundreds of millions to trillions of flying insects are killed annually by striking rotating turbine blades.
- **Altitude Overlap:** Large, modern turbines feature blade tips that stretch well into the flight ranges of migrating and swarming insects.
- **Relative Impact:** reduced population of insects to be consumed by predators (such as insectivorous birds).

2. The Attraction Effect (Ecological Traps)

Insects are aggressively drawn to wind facilities for several reasons, which inadvertently puts them in harm's way:

- **Turbine Colours:** Bright, standardized white paint colours, combined with infrared and ultraviolet light reflections, are highly attractive to flying insects.
- **Thermal Signatures:** The mechanical heat generated by the turbines during operation attracts cold-blooded insects, luring them straight into the path of the rotors.
- **Predator Aggregation:** Because so many insects cluster around the turbines, insectivorous animals (like bats and birds) are subsequently drawn to the area. This increases the vulnerability of these vertebrates to the same turbine strikes.

3. Noise and Physical Disturbance

- **Sensor Interference:** Some studies indicate that the continuous low-frequency noise and electromagnetic emissions generated by turbines might interfere with insect navigation, communication, and courtship patterns.
- **Habitat Disruption:** The construction and maintenance of wind farms inevitably alter local vegetation and soil conditions, which can cause local drops in insect diversity and biomass.

Dark Skies

The parish of Corsenside sits adjacent to a Dark Skies park, the third place in the world to be designated as such. Since its designation, we, as a parish, have been keen to promote the responsible use of lighting in order to prevent light pollution and the disruption of this site of national and world importance. We assume that due to the size of these turbines that collision avoidance lighting will be required. We ask that the impact of such lighting on the dark skies environment is properly assessed as well as its

impact on the visual amenity of residential properties with the possibility of a multitude of red flashing lights being present and visible from many residences within our parish.

Peat and carbon balance

We ask that the ES assesses whether the site or any part of the wider development area (including the grid connection route) overlies peat, and if so its depth and condition. Given current national interest in peat restoration, we ask that the ES addresses whether construction, and in particular the concrete required for turbine bases, would permanently preclude future restoration of any degraded peatland. We ask that biodiversity both during construction and post construction is considered, what will the impact be on existing plants and trees and are there any mitigations planned to replace those lost. We appreciate that plantation forestry is not the best way to ensure biodiversity, but even pine trees play an important role in carbon capture. We also ask that the ES presents a whole-life carbon balance for the development, including embedded carbon in construction materials and infrastructure.

Grid connection route

The proposed grid connection to Fourstones substation covers a significant distance and may affect land and habitats independently of the turbine site itself. We ask that all potential routes are assessed and the impact of the installation of cabling either beneath or above the ground is considered. We ask that the full cable route is assessed within the ES as an integral part of the development, rather than addressed separately at a later stage.

Construction traffic

The road network through Corsenside parish is not generally in good repair and many of the roads in the parish are both narrow twisty and largely unsuitable for sustained heavy vehicle movements. We ask that the ES addresses proposed haulage routes and their impact on rural roads, verges and also the amenity of residents during the construction period.

Northumberland National Park

The proposed development site sits very close to the boundary of Northumberland National Park, indeed the site is within 2 km of the NP boundary to the West, approximately 4 km to the North and part of the site actually butts up against the NP

boundary to the East. We ask that the ES considers the impact on the special characteristics of the National Park, on the amenity of visitors to the park and the effect on visitor numbers.

Hadrian's Wall

Hadrian's Wall is a UNESCO World Heritage Site and the footpath along its length is a National Trail. Both enjoy huge visitor numbers, some as day trippers coming to see the World Heritage Site and others enjoying a longer stay as they walk the 84 miles of the National Trail. We ask that the impact of the visibility of these turbines from Hadrian's Wall is also assessed.

Thank you once again for consulting Corsenside Parish Council and for allowing us to contribute our thoughts to the environmental impact scoping process. We reserve the right to comment more fully on the proposals themselves if and when a planning application is brought forward for consultation.

I would be grateful if you could acknowledge that you have received this communication and that our comments will be properly considered.

Yours sincerely,

Carl Hamilton

Carl Hamilton

Chair - Corsenside Parish Council



Civic Centre
Rickergate
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Cumbria CA3 8QG
Telephone 0300 373 3730
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Karen Wilkinson
Planning Inspectorate.
Environmental Services
Infrastructure Decisions And
Applications Service
C/O Quadient
69 Buckingham Avenue, Slough
SL1 4PN

Case Officer:

Paul Skelton

Direct Line:

E-mail:

[REDACTED]
[REDACTED]@Carlisle.gov.uk

Your Ref:

EN0110031

Our Ref:

PLS/DC/26/0001 NAC

22 May 2026

Dear Ms Wilkinson

Proposal: EIA Scoping And Consultation And Regulation 11 Notification
Location: Ray II Wind Farm, northeast of West Woodburn, south of Elsdon
and northwest of Kirkwhelpington, Northumberland
Appn Ref: 26/0001 NAC

Thank you for your letter dated 7th May 2026 regarding the Scoping Report submitted by Vattenfall in respect of their preparation of an Environmental Statement to accompany an application for the Ray II Windfarm in Northumberland.

Having reviewed the Scoping Report, I can confirm that Cumberland Council has no observations to make at this stage.

Yours sincerely

Paul Skelton
Senior Planning Officer

Contact: Claire Teasdale
Direct Tel: [REDACTED]
email: [REDACTED]@durham.gov.uk
Our ref: AACON/26/01043



RayIIWindFarm@planninginspectorate.gov.uk

Lucy Morgan
Associate Environmental Advisor
The Planning Inspectorate

4 June 2026

Dear Ms Morgan

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations)

Proposed Scoping Opinion Consultation from Planning Inspectorate under Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulations 10 and 11) in respect of an application by Vattenfall Wind Power Ltd for an Order granting Development Consent for the Ray II Wind Farm
At Ray II Wind Farm
For Lucy Morgan

I write in response to your letter dated 7 May 2026 regarding the above.

Given the location of the proposed site, it is unlikely that the project including the cable corridor would have a direct impact on the environment of County Durham or the amenity of County Durham residents. Given the distance of the project from County Durham the majority of key environmental considerations identified in the Scoping Report are not of relevance to County Durham, but specific matters to raise are set out below.

Highways

Given the significant distance of the project from any roads under the jurisdiction of Durham County Council as Local Highway Authority, it is not considered that the development would have any material impact on the local highway network in Durham.

Ecology

In terms of impact on habitats the site is too far from County Durham for any significant indirect or direct impact. Birds may be of interest as if flight lines or migratory routes for the interest features of the North Pennines Moors SPA are impacted then this would be an issue. It is noted that ornithology would be considered through the EIA process.

Regeneration, Economy and Growth

Durham County Council, Planning Development (Strategic), PO BOX 274, Stanley, Co. Durham, DH8 1HG
Main Telephone: 03000 262 830

Planning Policy

Section 4.6 of the Scoping Report considers Local Planning Policy and Guidance and focuses on the Northumberland Local Plan and also the Northumberland National Park Plan and question 4.1 seeks views on whether there are any additional planning policy documents at the local or national level which the Applicant should consider in the preparation of the application and EIA.

It is noted that section 4.6 does not refer to the County Durham Plan. Nor does it refer to any other relevant Local Plans in other Local Planning Authorities areas which lie within the 45km study area. Similarly, it does not refer to the North Pennines Area of Outstanding Natural Beauty Management Plan. It should also be noted that under Section 245 of Levelling-up and Regeneration Act 2023 decision makers including upon nationally significant infrastructure projects need to have regard to the Protected Landscapes duty when undertaking any function in relation to, or so as to affect, land in a Protected Landscape. They must now 'seek to further' the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes. It would therefore be necessary for the report to consider addressing the North Pennines AONB Management Plan, (noting that this is currently under review). It is considered other Local Plans, and the North Pennines AONB Management Plan should be considered given the extent of the study area and the zone of theoretical visibility for this proposed wind farm.

Landscape and Visual Impact

While no direct effects are anticipated within County Durham, the LVIA should ensure that any potential landscape and visual effects arising from the scale of the proposed development are appropriately considered, particularly in relation to the North Pennines National Landscape and other valued landscapes within the County.

Chapter 6 – Landscape and Visual (Responses to Scoping Questions)

Q6.1 – Methodology

No specific objection to the overall LVIA approach at this stage. The methodology should, however, ensure that it captures potential effects at longer distances, particularly in relation to designated landscapes, including the North Pennines National Landscape. The LVIA should also clearly distinguish between theoretical visibility and likely significant effects, particularly at greater distances.

Given the scale of the proposed development and the presence of existing and emerging wind energy schemes within the wider area, cumulative landscape and visual effects are likely to be an important consideration. The LVIA should ensure that a proportionate cumulative assessment is undertaken, including schemes that may influence the experience of the North Pennines National Landscape, particularly where developments are perceived in combination in views from upland and more remote areas.

Q6.2 – Study Areas

The proposed 45km study area is noted and appears proportionate given the scale of the turbines. It will be important that:

- The extent of the study area is clearly justified in relation to potential visibility and influence across County Durham.

- Consideration is given to whether receptors beyond the 20km detailed study area—particularly designated landscapes—require a more detailed level of assessment where effects may occur.

While the 45km study area is generally appropriate, it may not fully capture longer-distance views experienced from elevated parts of the North Pennines National Landscape, particularly where open upland character allows for extensive visibility.

In particular, the approach should not be limited to the fringes of the North Pennines National Landscape. The assessment should ensure that potential effects on views experienced from the more remote interior of the National Landscape, including moorland ridges and summits, are appropriately considered.

Q6.3 – Viewpoints

The proposed list of viewpoints is noted. However, it is likely that further refinement will be required to ensure that the assessment properly reflects the character of the North Pennines National Landscape and the wider study area.

In particular:

- The current viewpoint list does not include representative viewpoints from within County Durham, despite the potential for visibility indicated by the ZTV. Consideration should be given to including viewpoints within County Durham where appropriate, reflecting sensitive receptors.
- Greater emphasis should be placed on elevated viewpoints within upland landscapes, including moorland ridges and summits, which are key to understanding visibility and scale.
- Viewpoint selection should not be limited to locations on the margins of the designation, but should include representative viewpoints from within the National Landscape, including more remote upland areas.
- Consideration should also be given to key skylines and horizons, which contribute to the perception of openness, scale and undeveloped character.

This is important to ensure that the LVIA reflects how the development would be experienced across the National Landscape and wider study area, including from representative receptors within County Durham and the more sensitive and remote interior of the North Pennines National Landscape.

It is recommended that final viewpoint locations are agreed with Durham County Council's Landscape Officers, and other relevant consultees where appropriate, at a later stage.

Q6.4 – Aviation Lighting

Consideration should be given to viewpoints within remote and dark upland areas of the North Pennines National Landscape for the assessment of aviation lighting, where effects may be more apparent due to low existing baseline levels of illumination.

Q6.5 – Additional Receptors

The assessment should include appropriate consideration of:

- The special qualities of the North Pennines National Landscape, including tranquillity, remoteness, expansive views and dark skies
- Areas of Higher Landscape Value within County Durham, where these fall within the extent of potential visibility and may be affected

- Elevated and open access land where visibility is likely to be greatest

Q6.6 – Other Consultees

Given the potential for effects on the North Pennines National Landscape, it would be appropriate to consult the North Pennines National Landscape (AONB) Partnership in relation to landscape and visual matters.

Yours sincerely

Claire Teasdale

Claire Teasdale
Principal Planning Officer

Elsdon Parish Council - Scoping Opinion for an Order granting Development Consent for the Ray II Wind Farm.

Ref: EN0110031 Application No. 26/01624/SCOPE

Elsdon Parish Council makes the following points and observations regarding the scope of the information that will be presented in the next stage of the application for the Ray II Wind Farm to ensure that there are no omissions or inappropriate assumptions made that would impact upon Elsdon parish and the immediate area. We do not comment where considerations have already been confirmed to fall in scope of the assessments that will be conducted.

It is worth noting at this stage that Elsdon Parish Council's main concern is the size of the turbines. At 230m high the proposed turbines would dominate the village of Elsdon and other nearby areas. The Government's Policy Document requires a Developer to consider the magnitude of change that would result from the plan and as the proposed turbines are almost twice the height of existing nearby turbines, they are in no way comparable. We therefore feel that an assessment should be conducted as to whether a greater number of smaller turbines could be utilised in this project.

Chapter 6 - Landscape & Visual Impact

Our initial view regarding the impact on visual amenity is that it ought to be assessed up to a distance of 4km. The Scoping document suggests that 'Effects are unlikely to reach the residential visual amenity threshold beyond 2km' but as Elsdon is within the much-valued Dark Sky Area, this would be severely impacted by the excessive aviation lighting required for the proposed height of the turbines – 2032 lights per turbine. The resulting light pollution would impact visual amenity across the Parish including destroying our enjoyment of the Dark Sky Area.

This could be mitigated by significantly reducing the height of the turbines which would decrease the overall area of light pollution spilling into the Dark Sky Area.

Additional viewpoints ought to be included around Elsdon in the visual impact assessment, both daytime and nighttime to provide a fuller picture. The current proposed viewpoint is the centre of the village green. It is well known that the Medieval village of Elsdon sits in a small natural amphitheatre formed by surrounding hills. Views beyond the hills are therefore obscured from this point so it does not represent Elsdon as a whole. We would suggest that an additional viewpoint is added: - The Mott (remains of Mott & Bailey castle) which is a popular tourist location and more representative of the view experienced by the wider parish. NY93575 93204 (What3Words clouding.encoding.guessing)

Chapter 9 – Ecology & Nature Conservation

We are of the view that the Wildlife Trust ought to be asked for its opinion on the development as it owns the nature reserve adjacent to the site and therefore has extensive knowledge of the ecology and wildlife of the area.

Chapter 11 – Water Resources & Flood Risk

Private water supplies – There are at least 4 properties in Elsdon, and more in surrounding areas, which rely on either bore holes or stream water that are very close to proposed turbines. This includes but is not limited to homes at Ottercops and Blaxter. If the proposed development cannot guarantee that neither construction nor operation will detrimentally affect the water supply of these properties mitigation ought to be built into the project. The Parish Council is of the view that the preferable and most effective mitigation would be to move those turbines further away from the residences.

Chapter 12 – Access, Traffic & Transport

We note that access and traffic at the construction stage is within scope but would like to stress the specific circumstances of the area around the development site.

The construction is likely to significantly impact the local communities. Any road closure in the area result in very long diversions due to the limited number of access roads to villages. These must be minimised and be coordinated with any council roadworks on alternative routes or villages may be cut off. This will severely inconvenience locals but is also likely to impact on tourism. This inconvenience will last 2 years so mitigation is essential. No construction traffic can be permitted to drive through the village of Elsdon due to a weak bridge and impassable road to vehicles over 7.5tons. It is suggested that the development liaise with local representatives of villages during construction phase.

Chapter 13 – Noise

We do not agree that an assessment of **low frequency noise** and **amplitude modulation** can be scoped out of the EIA. The reports that are referenced as evidence for this are based on older, smaller wind turbines. An assessment of a comparable turbine in terms of size and power ought to be conducted to a distance of 1km.

Again, we do not agree that operational **vibration** can be assumed not to be perceptible at the closest vibration sensitive receptors. The report cited as evidence was based on medium sized turbines in operation at the time of writing (2005). The author of the report published a further article in 2015 which stated this fact and that further work would be required to establish whether the findings could be used to predict vibrations from turbines of all heights and power. Given the much larger concrete base likely required to secure a 230m structure and the size and power of the turbine itself a site- specific assessment ought to be conducted.

The Government's National Policy Statement sets out that noise and vibration can have a quality of human life impact including annoyance, sleep disturbance, cardiovascular disease and mental ill-health. It also notes that vibration can cause damage to buildings. It is therefore essential that a full assessment of noise and vibration is carried out.

A developer is required to take all reasonable steps to mitigate harm and we would suggest that an appropriate approach would be to move the turbines further away from existing houses.

Chapter 15 – Socio-economics, Tourism & Recreation

The Scoping document has examined data on local housing and demographics and has reached some incorrect conclusions such as the low incidence of social housing meaning a lower reliance in it, and there being a less pressured housing market whereas in practice it is simply a matter of low availability of social housing. An influx of construction workers could be detrimental to the local situation by making short-term rental accommodation less affordable. Likewise, by taking up very short-term accommodation, this could prevent tourists from visiting the village and wider area. There are few businesses in Elsdon that may benefit from an influx of construction workers.

Chapter 16 – Shadow Flicker

The National Policy Statement sets out that projects should avoid, mitigate and compensate for harms. It also states the expectation that developments will be located a minimum distance of 10x the blade diameter from any regularly operated building. The Scoping document contravenes this and simply states that it will assess the impact on properties within this distance. The document further suggests mitigation that may be offered, should there be complaints in the future, and this includes 'internal and external screening at the property'. The Parish Council is of the view that curtains would never be an acceptable solution to shadow flicker from a 230m high turbine on a residential property.

The development plan ought to 'build in' mitigation of harms and therefore it would be appropriate to re-site turbines that are close to residences and to move them further away. This only applies to a very small number of turbines so ought not to be unreasonable.

In addition, the Scoping document does not clarify whether the colour and surface finish of the blades will prevent 'a strobe effect' across a much wider area.

It is our view that an assessment ought to be undertaken to examine shadow flicker beyond 10x the blade diameter given the excessive height of the turbines.

Chapter 16 – Air quality

We are of the opinion that the impact on air quality of all aspects of the construction phase ought to be assessed particularly given that this phase is estimated to last 2 years.

Northumberland is a Radon affected area but there is no mention of an assessment of the risk of radon release caused by the works which would impact on human health. This ought to be incorporated into the scoping document.

Chapter 16 – Other

We do not agree that decommissioning effects can be scoped out of the EIA based on the assumption that they will be no greater than at construction phase. No mention has been

made of how the concrete slab will be removed and the noise and air pollution impact of this. If the slab is to be left in place, then an assessment of the long-term impact on environmental considerations ought to be conducted.

Additional Note

It is requested that if any assessments involve drone surveys, then the local community is advised in advance. There have been local instances of drones being used to identify targets for rural crime, so drone sightings are likely to cause concern.

End

F.A.O. Karen Wilkinson
Environmental Services
Infrastructure Decisions and
Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Reference: OR-0003828/01
Customer reference: EN0110031

04 June 2026

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) –
Regulations 10 and 11: Scoping consultation and notification of the
applicant's contact details and duty to make available information to the
applicant if requested**

**Application by Vattenfall (the applicant) for an Order granting Development
Consent for The Ray II Wind Farm (the proposed development)
Northumberland, adjacent (north) to the existing Ray Wind Farm,
approximately 1 km south of Raylees.**

Dear Madam

Thank you for referring the above scoping consultation for comment on 07 May
2026.

The Environment Agency has reviewed the Ray II Wind Farm Scoping Report, by
ERM, dated May 2026, ref. 0758386.

We take issue with the scope of the Environmental Impact Assessment (EIA) as
currently defined and would recommend further issues are scoped in to meet the
requirements of the EIA regulations.

Further detailed comments are provided within the following appendices:

- Appendix A – Comments on the scope of the EIA
- Appendix B – General advice on the proposals and EIA content
- Appendix C – Additional advice for the Applicant

Please note this response does not represent our final view in relation to any future DCO, or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

We trust our advice is useful. If you have any queries please don't hesitate to contact me.

Yours faithfully

Jane Field
Planning Specialist – National Infrastructure
[REDACTED]@environment-agency.gov.uk

creating a better place
for people and wildlife



Appendix A – Comments on the scope of the EIA

Groundwater and contaminated land

Document & chapter: Section 3.4.1, 10.1, 11.1, figure 10.1 & figure 11.1	
Issue	The study area does not include the Cable Corridor Options
Impact	Proposed activities and potential receptors have been omitted from the assessment. This includes hydrogeological receptors and potential sources of contamination which could be impacted by cable laying, should overhead lines not be taken forward.
Solution	Include the whole site (wind farm site and Cable Corridor Options) in the geographical scope.
Additional dialogue / commentary: Section 10.1 states that the Study Area is shown in Figure 10.1 and that for the purposes of scoping the 'Site' refers solely to the wind farm Site and excludes the Cable Corridor Options. The wind farm Site and Cable Corridor Options together comprise the Scoping Boundary, and within this chapter 'the Study Area'. However, Figure 10.1 depicts the Study Area as only incorporating the wind farm site, whereas the text in section 10.1 indicates that the Cable Corridor Options should also be included. Section 11.1 similarly states that, "For the purposes of Scoping, the water resources and flood risk study area is a 1 km buffer of the Site with the addition of the Cable Corridor Options (unbuffered) (the 'Study Area'). The Study Area is shown in Figure 11.1: Water Resources and Flood Risk Study Area." However, Figure 11.1 depicts the Study Area as a 1km zone around the wind farm site and does not include the Cable Corridor Options. Section 3.4.1 states that, "The assessment approach and methodology within each chapter identifies the study area to be assessed and explains why this area is appropriate." We do not believe the choice of study area for chapters 10 and 11 has been sufficiently justified. An explanation for omitting the Cable Corridor Options from the study area in both chapters 10 and 11 has not been provided. <i>Please note that our comments relating to chapters 10 and 11 relate to features and receptors within the whole proposed Order Limits (ie the wind farm site and the cable route options).</i>	
Document Reference(s): Table 10.3 & Table 11.2 (GWCL)	
Issue	Not all potential risks to groundwater receptors have been included in the scope.

	Table 10.3 states that impact on Geology and Soils from earthworks, foundations, tracks and other infrastructure that have the potential to affect geology and soils have been scoped in. These activities also have the potential to affect groundwater receptors, but they are not listed in Table 11.2.
Impact	Mitigation may not be provided for groundwater impacts
Solution	Clearly list and assess all possible activities that may affect groundwater receptors and assess appropriately. This should include but not be limited to foundations for the wind turbines and BESS drainage.
Additional narrative / explanation (if necessary): The Water Framework Directive Assessment and Water Resources have been scoped in, but these are broad categories. Hydrogeology has been scoped in, but the table only lists dewatering and trenchless crossing cables as activities that could impact groundwater. Foundations for the wind turbines, BESS drainage and other infrastructure could affect groundwater but are not detailed. Wind turbine, substation and BESS foundations have not been designed yet. The installation of deep piled foundations could create pathways for the rapid migration of contaminants into groundwater. The ES should assess these activities and design appropriate mitigation. This may include a Foundation Works Risk Assessment, to be secured via the CEMP. The oCEMP should include reference to mitigation measures for construction activities.	

Document Reference(s): Chapter 2.3 (Cable Corridor Options) (GWCL)	
Issue	The proposed scheme will include high voltage cables, but it is not known at this stage whether they will overhead, buried or a combination. If buried there are very specific environmental risks to

	the groundwater environment which are not currently acknowledged within the scope.
Impact	Should buried high voltage cables be proposed there is a risk during the operational phase of heat pollution occurring in groundwater from the thermal impact of the cabling
Solution	Heat impacts to groundwater should be scoped in to the assessment if cables are to be buried
Additional narrative / explanation (if necessary): Consider the impacts of installation and operation of buried high voltage cables on hydrogeology. Heat as a groundwater pollutant was introduced in 2023 via the <u>Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 SI No.2023/651</u>. As such, discharges that might lead to an input of heat into groundwater are groundwater activities. We aim to be proportionate and pragmatic in our application of the principles of the Environmental Permitting Regulations and requiring a permit would feel disproportionate for many activities at or near the ground surface. At this stage we require the potential thermal implications of buried high voltage cables, in relation to risks to groundwater, to be considered via desk-based assessment. In those rare instances where we are concerned that there are risks which require ongoing control or management, we may opt to regulate it as a groundwater activity under schedule 22 of the Environmental Permitting Regulations (EPR) 2016. The Environment Agency currently has no specific guidance relating to the potential thermal implications of buried infrastructure including cables. We suggest that our guidance for ground source heating and cooling systems should be used as a guide. The following link contains relevant information, including thermal plume modelling and an interactive system map and spreadsheet: <u>Environmental impacts of temperature changes from ground source heating and cooling systems - GOV.UK</u>.	

Water Quality

Document & chapter: Chapter 2. The Proposed Development Appendix B Part 1 (Figures) - Figure 2.1 - Site Layout Chapter 11. Water Resources and Flood Risk Chapter 16. Other Issues	
Issue	Section 2.4 describes a BESS with batteries, and a substation and each wind turbine with transformers but water quality risks from firewater associated with this infrastructure has not been identified within Chapter 11 and has not been specifically listed as an activity that presents a potential risk to groundwater. Chapter 16.8 Major Accident and Disasters is proposed to be scoped out.
Impact	Firewater and other chemicals from BESS or a substation pose an unacceptable risk to both surface and groundwater receptors and will deteriorate water quality unless it is contained and removed sufficiently. Batteries at the BESS can pose a water quality risk if they leak. Figure 2.1 indicates the proposed location of the BESS and substation to be on the Tyne Limestone, secondary A aquifer, which is a sensitive groundwater receptor.
Solution	The risk from firewater to both surface water and groundwater must be scoped in, either into Water Resources and Flood Risk, or Other Issues. An outline Battery Safety Management Plan (oBSMP), should be committed to should a BESS is taken forward.
Additional dialogue / commentary: It must be demonstrated that the BESS and substation drainage design would be able to manage firewater and can be isolated. In event of a fire, there must be the provisions to contain sufficient volumes of firewater to prevent release to environment, and this should be disposed offsite. See Appendix C for guidance on BESS design and Substation drainage.	

Document & chapter: Chapter 2. The Proposed Development and Chapter 11. Water Resources and Flood Risk	
Issue	We recognise that section 11.4 identifies potential effects on water resources and flood risk that have the potential to occur, however there is no reference to risks to water quality arising from foul drainage

	proposals, and little detail to the potential other causes of water pollution.
Impact	Should foul drainage not be connected to mains in any operational phase, discharges from a non-mains treatment or containment system can cause pollution to both surface or ground waters. There is a potential for direct and indirect impacts from construction activities, like earthworks, concrete pouring, storage of oils and chemicals, and drilling fluid break out, which increases the risk of sediments, hydrocarbons, heavy metals and other contaminants entering watercourses via surface water runoff and decreasing the water quality.
Solution	The Applicant should recognise where activities pose a higher risk to deteriorating water quality of surface waters. Foul drainage should be recognised as a risk to the water environment and scoped in accordingly. Foul water management and disposal will need to be sufficient to minimise risk entering the water environment and deteriorating the water quality.
Additional dialogue / commentary: Section 11.4 states “Impacts to surface water quality as a result of chemical pollution from mobilisation of pollutants through surface water runoff and / or from accidental spills and leaks”, however this level of detail is not specifically named in Table 11.2 and therefore certain activities are not explicitly scoped in. Section 2.4.6 says there will be temporary welfare facilities (portacabins) but management of this is unclear, and it is not identified as an impact in section 11.4. It should be confirmed if portacabins are sealed systems, and if any treatment is being provided. Information on septic tank permits can be found at: Septic tanks and sewage treatment plants: what you need to do: Apply for a permit - GOV.UK If road transport to an offsite disposal facility is required to remove foul water from the portacabins, then there should be regard for this within the waste management procedures.	

Water-based Ecology, Fisheries and Geomorphology

Document Reference(s): Chapter 9 / Table 9.4

Issue	The Environmental receptors/ ecological features identified are not comprehensive, and there is ambiguity and vagaries in the specification of what has been identified. Aquatic invertebrates (except white clawed crayfish and freshwater pearl mussel) are not specifically identified or terrestrial invertebrates. Whilst peatland and woodland habitats are identified, the potential presence and impact upon Groundwater Dependent Terrestrial Ecosystems is not explicitly mentioned. 'Rivers' are identified as a feature; it is unclear which water courses meet this definition (e.g. how will smaller streams/ ditches be assessed).
Impact	The scoping position with respect to these ecological features is consequentially unclear, and associated impacts could go unassessed and unmitigated.
Solution	It should be clarified that all 'watercourses' are scoped in. This definition encompasses rivers, streams, brooks, rills, other smaller and ephemeral watercourses and ditches. It should be made clear that all of the above have been scoped in, and included in survey programmes, assessment and mitigations as appropriate.
Additional narrative/ explanation (if necessary)	

Document Reference(s): [Chapter 9/ 9.4.1]	
Issue	Not all potential impacts to habitats have been identified as being scoped into the assessment, including biosecurity considerations, the spread of invasive non-native species and diseases, habitat fragmentation.
Impact	There is a risk that not all ecological degradation could occur if these impacts are not scoped in for consideration.
Solution	Ensured these matters are scoped in, and ensure these impact pathways are considered, with appropriate mitigation measures implemented and secured.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Chapter 9.2.1 - Ecology and Nature Conservation, (Fisheries)
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Issue	The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity. The legal responsibility on the developer pertaining to this fish specific legislation has not been considered.
Impact	This infers that the impacts on fish from the construction, operation and decommissioning have not been fully considered.
Solution	Both pieces of legislation should be listed as relevant in the biodiversity chapter of the ES.
Additional narrative / explanation (if necessary): Parts of The Salmon and Freshwater Fisheries Act 1975 relevant to this type of development and that should be considered, are (but not exhaustive) Part 1, Sections 2 and 4. Parts of The Eels (England and Wales) Regulations 2009 relevant to this type of development and that should be considered, are (but not exhaustive) Part 4.	

Document Reference(s): 9.5.4.1 (Fisheries)	
Issue	Fish surveys are not scoped in.
Impact	Without fish surveys there would be insufficient environmental baseline to inform the EIA. Unable to fully assess the impact-pathway to receptors without a thorough understanding of the baseline. This also enables how the scheme is designed as well as the need for suitable mitigation.
Solution	Fish surveys should be conducted within 'The Site' on any watercourses /waterbodies that have suitable habitat for fish and where intrusive or in-channel works are proposed on the watercourse/waterbody. This is also particularly prudent given the additional potential impacts listed in 11.4 in Chapter 11.

Additional narrative / explanation (if necessary):

Any fish surveys using equipment other than rod and line will require written permission from the Environment Agency under S27a of the Salmon and Freshwater Fisheries Act 1975. The FR2 application should be accompanied with a method statement detailing timings, locations of proposed surveys, proposed equipment and fish welfare measures.

Document Reference(s): Table 9.4 (Fisheries)

Issue	Impacts to fish from electromagnetic fields (EMFs) from buried high voltage cables under watercourses has not been scoped in.
Impact	The River North Tyne contains a population of a number of diadromous fish species which are sensitive to levels of EMF, such species include European eel, river lamprey and Atlantic salmon. Potential impacts include behavioural impacts and effects on fish egg development.
Solution	The rationale for scoping in of fish should also include the potential impacts on fish from Electromagnetic fields (EMFs) emitted from high voltage (>132kV) buried cables under main watercourses. We note the cable corridor is proposed to cross the River North Tyne. The assessment should provide a worse case estimate of the likely strength of EMF at the bed of the watercourse and compare it to natural background levels. It maybe that mitigation will be required based a precautionary approach which could include burying the cable deeper, grouping cables together and/or operational monitoring of levels of EMF.

Additional narrative / explanation (if necessary):

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Appendix B – General advice on the proposals and EIA content

Document Reference(s): Chapter 10.3.1 (GWCL)	
Issue	There are no operational or historic landfill site within the red lined area ("the site") of the proposed Ray 11 Wind Farm or within 250 metres of the red lined boundary. However, there are a number of known closed landfill sites within the proposed cable corridors which are not acknowledged within the report. This links to the issue in Appendix A relating to geographical scope of the EIA.
Impact	The laying of cables could risk cutting through a landfill, and groundwater contamination could occur through the creation of a new preferential pathway from the disturbance of historic waste or leachate into the underlying or adjacent aquifer.
Solution	When refining cable routes, historic landfills and particularly permitted landfills should be avoided wherever possible. Appropriate risk assessments should be undertaken to ascertain risks to groundwater and any below-ground work in this area should take account of the potential presence of landfill gas. Discussions with the landfill permit holder should be opened to discuss the implications of the proposed cable corridor running through the landfill site.
Additional narrative / explanation (if necessary): Cable Options 1&2: • Frankham Quarry • Frankham Landfill Site	

Cable Corridor Option 3

- Middle Whitehill Quarry Landfill Site
- Knowesgate Waste Disposal Site (Resolution 34)
- Knowesgate Waste Disposal Site (Resolution 49)
- Knowesgate Landfill Site

Frankham landfill site is currently permitted and subject to ongoing landfill gas monitoring under the terms of their Environmental Permit. It must be ensured that laying of the pipeline does not compromise the ability of the landfill operator to meet the conditions of their permit now or in the future.

These sites are subject to both known and unknown risks associated with landfill gas. This can pose a risk to both the pipeline itself and to human health therefore the Local Authority should be engaged in any discussions relating to this.

Further information on the landfills and landfill gas advice is provided within Appendix C.

Document Reference(s): Chapter 10 – Geology, Peat and Soil (GWCL)

Issue	The possibility of encountering unexpected contamination during and beyond the construction of the scheme is not mentioned within the report.
Impact	If a protocol for how to manage unexpected contamination in accordance with Land Contamination Risk Management guidance is not proposed risks to controlled waters may not be adequately assessed mitigated.
Solution	Ensure that a commitment to managing unexpected contamination is included in the OCEMP, OOEMP and ODEMP.

Additional narrative / explanation (if necessary):

Our suggested process is:

In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the environmental statement, then no further development (unless otherwise

approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency.

Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency.

Remediation must be carried out in accordance with the approved scheme under sub paragraph (2).

Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency.

Document Reference(s): Chapter 10.3.6 onwards (GWCL/Peat)

Issue	From 10.3.6 onwards the report recognises peat >0.4m as sensitive. This is contrary to Natural England's <u>Definition of Favourable Conservation Status for Blanket bog (RP2967)</u> which has adopted a >0.3m depth for defining blanket bog and recognise that shallower areas of peat can be an important part of the ecohydrological unit of a body of peat.
Impact	The sensitivity of the peatland at this location has not been appropriately recognised and areas of shallower peat with a role in ecohydrological function have not been recognized. The full extent of potential damage to peat habitats and its associated

	environmental functions may go unassessed.
Solution	The assessment should define sensitive areas of peat as depths greater >0.3m and consider if shallower areas are important to the ecohydrological functioning of the peat body.
Additional narrative / explanation (if necessary): Stability, disturbance, loss and compaction of peat has been scoped in to the assessment and this is welcomed. It should be noted however that the full report has not been fully reviewed due to time constraints therefore omission of comment on other aspects of peat impacts or assessment should not be assumed as accepted and agreed.	

Document Reference(s): Chapter 11.3.2 (GWCL)	
Issue	The reports refers to a 'moderately productive' aquifer being present beneath the study area. This terminology is incorrect. The report also does not list all geological formations and aquifers that underlay the site.
Impact	Misrepresentation of this sensitivity could result in an underestimation of the impacts to groundwaters. Most of the geological units beneath the site are classified as Secondary A aquifers. These are sensitive groundwater receptors that require protection from pollution.
Solution	Ensure the Environmental Statement uses the correct terminology and lists all groundwater receptors. Refer to <u>The Environment Agency's approach to groundwater protection</u> (publishing.service.gov.uk)
Additional narrative / explanation (if necessary):	

The following geological formations are present beneath the study area. Their aquifer classification is listed in brackets.

- Stainmore Formation (Secondary A)
- Four Fathom Limestone (Secondary A)
- Alston Formation (Secondary A)
- Low Tipalt Limestone (Secondary A)
- Tyne Limestone (Secondary A)
- Lower Demesne Limestone (Secondary A)
- River Terrace Deposits (Secondary A)
- Upper Gunnerton Fell Limestone (Secondary A)
- Lower Gunnerton Fell Limestone (Secondary A)
- Redesdale Limestone (Secondary A)
- Oxford Limestone (Secondary A)
- Dun Limestone (Secondary A)
- Cowell Limestone (Secondary A)
- Upper Bath-House Wood Limestone (Secondary A)
- Barrasford Limestone (Secondary A)
- Alluvium (Secondary A)
- Hummocky Glacial Deposits (Secondary A)
- Colwell Limestone (Secondary A)
- Great Whin Sill (Secondary B)
- Till (diamicton) (Secondary undifferentiated)
- Peat (unproductive)

Document Reference(s): Chapter 11.2.4 (GWCL)

Issue	The guidance section does not include Environment Agency 2018, The Environment Agency's approach to groundwater protection.
Impact	This document details our approach to groundwater protection and should be followed. Lack of consideration of this could result in groundwaters being detrimentally impacted.
Solution	Follow the Environment Agency's approach to groundwater protection, <u>Groundwater protection - GOV.UK</u> (www.gov.uk); <u>The Environment</u>

	Agency's approach to groundwater protection (publishing.service.gov.uk) to ensure sufficient mitigation to pollution is incorporated into the design.
Additional narrative / explanation (if necessary)	

Document Reference(s): Project Level - Conceptual Site Model (GWCL)	
Issue	Localised Artesian conditions are known to be present within the study area (proposed wind turbines, BESS, and substations) beneath the thin superficial deposits. Shallow minewaters (around 20 mbgl) have also been recorded in the in the Fourstones area, where the scheme connects to the grid at the substation. These are not mentioned within the report.
Impact	Inadequate conceptualisation of the site setting could lead to insufficient mitigation measures being proposed.
Solution	Ensure the conceptual site model in the Environmental Statement is accurate and propose mitigation measures accordingly.
Additional narrative / explanation (if necessary):	

Document Reference(s): Table 11.1 (GWCL)	
Issue	Cables may be installed using trenchless crossings. There is limited mention of this within the report although it has been scoped in for further assessment which is welcomed.
Impact	Although avoiding physical impacts to watercourses, horizontal direction drilling (HDD) may introduce contaminants to the water environment if not carefully managed.
Solution	Assess these activities and design appropriate mitigation. This may include

	a Hydrogeological Risk Assessment (HyRA) for HDD and a bentonite breakout plan, to be secured via the CEMP.
Additional narrative / explanation (if necessary): The oCEMP should include reference to mitigation measures for construction activities.	

Water Quality

Document & chapter: Table 11.2	
Issue	Table 11.2 scopes in Surface Water Hydrology, however it is unclear if this is for all phases of the project (Construction, Operation and Decommissioning).
Impact	There is the potential for direct and indirect impacts on surface waters during all phases.
Solution	It should be ensured that consideration is given to environmental factors during all phases.
Additional dialogue / commentary: We understand from section 2.5 that there will be a Decommissioning and Restoration Plan and section 11.6 says there will be a Construction Environmental Management Plan (CEMP). It should be considered whether there is also a need for an Operational Environmental Management Plan (OEMP) to cover operational risks.	

Document & chapter: Section 11.6	
Issue	Section 11.6 says a construction environmental management plan (CEMP) will be produced, but it does not mention a drainage or surface water management plan. It is unclear how drainage will be managed during all phases of the development.
Impact	Surface water management plan must be suitably designed to manage the risks from sediment, hydrocarbons, heavy metals and other hazardous substances which could get into surface water runoff and decrease water quality if these contaminants reach receiving surface watercourses.
Solution	When the Environmental Statement is produced, it should make it clear what SuDS types are proposed and how they are intended to improve water quality. Each SuDS will require a maintenance schedule commitment to ensure they perform optimally. This can be informed by the CIRIA SuDS Manual (C753F) which is listed in guidance section 11.2.4.

Additional dialogue / commentary:

We note that section 2.4.5 says that Sustainable Drainage Systems (SuDS) features will be on access tracks.

Document & chapter: Chapter 11. Water Resources and Flood Risk	
Issue	In Chapter 11 there is no mention of water quality monitoring.
Impact	If water quality monitoring is not appropriate then a suitable baseline of water quality data may not be captured, and any trends in water quality deterioration or improvement as a result of the project may not be understood.
Solution	A water quality monitoring plan should be provided when the Environmental Statement is produced. This should clarify locations, frequency, quantity and possible methods of monitoring. The Applicant should confirm how they intend to secure this existing monitoring commitment i.e. through the CEMP.

Document & chapter: Section 11.2.4	
Issue	Guidance is missing relevant guidance on pollution prevention.
Impact	Without reference to pollution prevention guidance important steps may be missed to protect water quality.
Solution	The Applicant should refer to <u>Pollution prevention for businesses - GOV.UK</u> and CIRIA C736, titled " <i>Containment Systems for the Prevention of Pollution</i> ".

Water-based Ecology, Fisheries and Geomorphology

Document Reference(s): Chapter 10, and sections 11.5.2, 9.5.2	
Issue	It is unclear how access tracks will cross watercourses
Impact	There is a risk that flood risk will be increased, habitats fragmented and ecological harm occurring should watercourse crossings for access not be designed appropriately. Impacts to watercourses and associated physical and ecological environments may be underplayed or missed entirely, leading to a detriment in watercourse condition.
Solution	It must be ensured that impacts of access track crossings are clearly assessed, informed by sufficient baseline information with avoidance, mitigation and compensation measures implemented to ensure appropriate siting and crossing methodologies. This should include consideration of flood risk, watercourse condition and morphology in addition to ecology surveys.

	Watercourse crossing schedules within the ES should be readily cross referenceable with baseline data.
Additional narrative/ explanation (if necessary)	
Where crossings are proposed on Main River watercourses, formal consent from the Environment Agency will be required.	
The commitment in 9.5.2 for underground cable crossings for watercourses to be via HDD with a minimum depth of 5m is welcomed.	

Document Reference(s): Section 9.5.4	
Issue	Survey proposals do not provide details for survey of aquatic invertebrates.
Impact	It is currently unclear what information will inform impact assessment with regard to this species group. There is a risk that baseline data will be insufficient if correct surveys are not undertaken.
Solution	The potential for this species group to be affected needs to be informed by habitat appraisal and further survey as appropriate. Further discussions regarding this are suggested.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Chapter 9.3.2.1 (Fisheries)	
Issue	Environment Agency fish population data is omitted from the desk study.
Impact	Insufficient environmental baseline to inform the EIA.
Solution	Include freely available EA fish survey data in the desk study. Data can be accessed here - EA Ecology & Fish Data Explorer
Additional narrative / explanation (if necessary):	

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Appendix C – Additional advice for the Applicant

Water Framework Directive

We understand a Water Framework Directive Assessment has been scoped in. We recommend the Applicant uses the Water Quality Explorer for available data for the baseline: [Map Explorer | Water Quality Explorer](#)

The advice linked below summarises the requirements of The Water Environment Regulations 2017 in relation to Nationally Significant Infrastructure Projects: [Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK](#) It should be complied with and could added to section 11.2.4 on guidance.

Further advice is not limited to estuarine and coastal waters in England, the guidance sets out general principles and a staged approach to assessment that the can be used for other water bodies such as rivers, lakes and groundwater: [Water Framework Directive assessment: estuarine and coastal waters - GOV.UK](#)

We recommend that [Environment Agency Ecology & Fish Data Explorer](#) is used to gather information with respect to aquatic habitats. This data is not listed and may not be available from the local records centre.

Flood Risk Assessment

It is noted that a Flood Risk Assessment (FRA) will be prepared alongside the Environmental Statement for the proposed development. We would welcome the opportunity to advise on a draft report prior to submission. The FRA should include:

Sequential Test - In accordance with National Planning Policy Framework and the sequential test (paragraph 172), development should apply a sequential, risk based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, if there are any opportunities for development to be located outside of flood zones 2 and 3 and into flood zone 1, this should be prioritised.

Flood Zones - The FRA will need to consider the future flood extent of the design flood plus climate change which should be informed by the design life of the development. We would also recommend development be setback from watercourses and the design flood extent. This allows for future remediation, replacement, raising of flood assets in the context of a changing climate and increasing flood risk.

Proposed Development Lifetime - The proposed development lifetime, including the construction, operation, and decommissioning phases should be confirmed.

Climate Change - If the development is classed as essential infrastructure, then from a fluvial flood risk perspective the higher central climate change allowance should be used (70th percentile). A sensitivity test for the credible maximum scenario, which in this case would be the upper climate change allowance for fluvial flows (95th percentile), should also be completed. Essential infrastructure should remain operational during the design flood scenario.

Watercourse Crossings - The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

Culverting existing watercourses/drainage ditches should be avoided. Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period. [paragraph 2.10.79 and 2.10.80 of NPS EN-3]
For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Works affecting non-main rivers/ordinary watercourse may require the prior consent of the Lead Local Flood Authority (LLFA) under the Land Drainage Act 1991. As such, we advise consultation with the LLFA in this regard.

Historic landfills

There are no operational or historic landfill site within the red lined area ("the site") of the proposed Ray 11 Wind Farm or within 250 metres of the red lined

boundary. However, there are a number of known closed landfill sites within the proposed cable corridors. These are:

Cable Corridor Options 1 & 2 (Pink and Purple)

There are two known closed landfill sites within these proposed cable corridors. Both sites are north of Fourstones village, Hexham and south of Frankham Fell.

The first historic closed landfill site is Frankham Quarry. Located at national grid reference NY8897868861. The site originally operated as a sandstone and limestone quarry until approximately 1965. Records indicate that waste operations commenced at the site around 1967. Northumberland County Council acquired the site in 1979 and it was used to dispose of household, commercial and industrial wastes. A licence was issued for the site on 14 April 1992. Environment Agency Reference No RO46. The licence was surrendered on 31 August 1993. The licence was superseded by waste disposal licence NBL 131.

The second known closed landfill site within proposed cable corridor 1 & 2 is Frankham Landfill Site. The site is permitted and regulated by the Environment Agency via environmental permit EPR/GP3597ZY (EAWML 67387). The permit is held by Northumberland Waste Management Limited. The permit was issued originally on 28 July 1993 by Northumberland County Council Waste Regulation Authority as waste disposal licence NBL 131. The site is permitted to accept household, commercial and industrial wastes. The closed landfill site is located at grid reference NY 89187 68865. The site stopped accepting wastes in April 1998. The site was also capped with clay and restored during 1998. The site is now in aftercare. A woodland now covers a large part of the former landfill site. The site has active landfill gas management system. This consists of a gas treatment bio filter and extraction system. The bio filter is used to treat low quality landfill gas which is produced on the site which is not suitable for combustion in the site's gas flare. The bio filter has been operational on the site for a number of years. Most of the landfill gas pipework on the landfill is sub surface with only manifolds and leachate monitoring wells visible.

The site benefits from 26 perimeter gas monitoring points which are used for the measurement of landfill gas. The permit holder continues to undertake routine monitoring of the landfill site and submits the monitoring data to the Environment Agency in compliance with the environmental permit and the sites monitoring management plan. Monitoring is submitted on annual basis. Based on the most recent monitoring data submitted by the operator for the site, the data is showing very low levels of methane and carbon dioxide are being recorded. The Environment

Agency continues to review submitted environmental monitoring data for the landfill site and undertake inspections of the facility.

Cable Corridor Option 3 (Blue):

There are four known closed landfill sites within the proposed Cable Corridor Option 3 (blue cable corridor). All four sites are located near Knowesgate and north of Kirkwhelpington.

Our limited historic records indicate that two of the closed landfill sites were historically known to be producing landfill gas, but it is unknown whether or not these sites are still producing landfill gas. The third historic site we hold no information on. The sites are:

Middle Whitehill Quarry Landfill Site. The licence was granted on 31 December 1976. The site accepted household, commercial, industrial and construction wastes from 1949 until 1983. The site is located at grid reference NY 99300 85700. The licence was surrendered on 31 March 1993. The Environment Agency's reference for the site is RO19 (Resolution No 19). The site operated and closed prior to the formation of the Environment Agency. We hold limited information on the site. The Environment Agency holds no other information on this site. It is currently unknown whether or not the site is producing landfill gas. The Local Authority may hold additional information on this site.

The second and third known closed landfill sites are known as Knowesgate Waste Disposal Site. The Environment Agency's references for these two sites are R34 and R49 (Resolution Nos 34 and 49). Our limited records indicate that landfill operations were taking place on the site from 1985. We hold no information on Resolution R34. Resolution 49 was operated by Northumberland County Council for the disposal of domestic, commercial and industrial waste from 1985. The waste disposal resolution licence was issued on 7 October 1991. Our limited records indicate that the site closed in the early 1992. The Environment Agency holds limited information on the site. It is unknown if the site is producing landfill gas. On the 1 September 1993, Knowesgate Site Resolution was surrendered. This left the southern end of the site requiring restoration. This subsequently resulted a waste disposal licence application being submitted to Northumberland County Council's Waste Regulation Authority. Waste disposal licence NBL 161 was subsequently granted.

The fourth known landfill site is known as Knowesgate Landfill Site. This site was licensed. The waste disposal licence was granted by Northumberland County Council Waste Regulation Authority to Northumberland County Council Waste Disposal Authority on 7 May 1985. Waste Disposal Licence Number NBL 161

(EAWML 67417). The site was licensed to accept naturally occurring excavated materials and inert construction waste. The site was licensed to accept up to 25,000 tonnes of waste annually. The first waste was deposited on 7 May 1985 and the last was deposited on 31 December 1994. This licence was granted to enable the former Knowesgate landfill site (Resolution Number R49) to be restored. Located at grid reference NY 99563 85636. The licence was surrendered on 31 May 2006.

Landfill Gas

Landfill gas consists of methane and carbon dioxide. It is produced as the waste in the landfill site degrades. Methane can present a risk of fire and explosion. Carbon dioxide can present a risk of asphyxiation or suffocation. The trace constituents of landfill gas can be toxic and can give rise to long- and short-term health risks as well as odour nuisance. The risks associated with landfill gas will depend on the controls the operator has in place to prevent its uncontrolled release from the landfill site. Older landfill sites may have poorer controls in place and the level of risk may be higher or uncertain due to a lack of historical records of waste inputs or control measures. The risks associated with landfill gas will depend on the controls the operator has in place to prevent its uncontrolled release from the landfill site.

Consideration should be given to the potential risk to the development from landfill gas, supported by appropriate assessments to identify potential risks. Where risks are identified, it should be ensured that measures to address them are included within the DCO. We advise seeking the views of the LPA's Environmental Health and Building Control departments to ensure that any threats from landfill gas have been adequately addressed in the proposed development.

The following publications provide further advice on the risks from landfill gas and ways of managing these:

- Environment Agency LFTGN03 'Guidance on the Management of Landfill Gas'
- Building Research Establishment guidance – BR 414 'Protective Measures for Housing on Gas-contaminated Land' 2001
- Building Research Establishment guidance – BR 212 'Construction of new buildings on gas-contaminated land' 1991
- CIRIA Guidance – C665 'Assessing risks posed by hazardous ground gases to buildings' 2007

BESS Site Design

Please find attached the Environment Agency's latest guidance on managing risks from Battery Energy Storage Sites (BESS).

We refer the applicant to 'The Environment Agency's approach to groundwater protection' (February 2018, version 1.2), particularly policies, A2 Precautionary principle, A4 Responsibility for assessments, A5 Supply of adequate information and C1 Nationally or regionally significant schemes.

The National Fire Chief's Council has published detailed guidance on recommended fire protection measures for BESS sites. We recommend the applicant refers to this when designing the scheme: [Grid Scale Battery Energy Storage System planning – Guidance for FRS \(nfcc.org.uk\)](https://www.nfcc.org.uk/guidance-for-frs)

Firewater drainage from the BESS units should therefore be contained within a sealed, impermeable drainage solution, unless the developer can demonstrate an alternative method which provides sufficient mitigation. Without this sealed drainage the level of risk present will depend on the receiving receptors and the Planning Inspectorate will decide if this risk is acceptable. We assess the reasonable worst-case consequence of a failure not the likelihood. It is the applicant's responsibility to demonstrate that risk to the water environment will be safely managed.

The drainage solution should demonstrate that contaminated firewater can be adequately contained within the site to ensure that there is no discharge of polluted water to ground or surface water bodies. The scheme should include an impermeable base or layer beneath the battery unit compound to ensure infiltration beneath the site can be controlled.

Any system for the storage of contaminated firewater should have sufficient capacity/headroom for the volumes expected in the event of a fire, even during periods of intense rainfall. The system for containing firefighting effluent should be automatic with a backup system in place in case of power failure.

Where BESS sites are designed with fire extinguishing systems that do not rely on water, fire crews may still use water for boundary cooling, and this can contain pollutants from the burning units, including any associated chemical leakage, and dust and ash from the air. As such, we expect firewater capture to be included in any design.

The drainage system should incorporate a penstock valve automatically triggered in the event of a BESS fire. The oOEMP should include details of ongoing maintenance

and testing of penstock valve(s) as traditional penstocks, when not operated for a long period of time, have historically been known to seize up and thus be inoperable at times of emergency. The maintenance programme should include clearly defined frequency of checks to guarantee these remain operational at all times to ensure that they perform in the event of a fire. The automatic shutoff valves should also include a manual override in case the automation fails.

Drainage solutions at BESS often include a permeable substrate above an impermeable lining. The impermeable lining will prevent any infiltration and protect groundwater but there is the potential for pollutants to attach to the surface of the permeable stone in the lined areas which could be re-mobilised in surface water runoff and reach the water environment, unless the containment areas are managed after a fire event.

To ensure that the permeable stone does not act as a source of secondary pollution once drainage is reinstated following a fire event, we seek a commitment from the Applicant that, in the event of a fire, the stone surfacing is fully cleaned, or removed and replaced before any drainage valves can be reopened.

Substation drainage

The Applicant should clearly outline the committed design mitigation to prevent contaminants from substation plant containing hazardous chemicals, such as oil transformers, from releasing contamination to the surface water drainage system from both spills and leaks during operation and any fire events.

Suitable lining and a sealed drainage systems are important to prevent any contaminants reaching groundwater or surface waters via runoff. The Applicant should confirm that the Substation will be impermeably lined.

In addition to comments above, the Applicant could commit to using a dry-type transformer which does not contain flammable oil and can decrease the risk of fire at a substation.

Even if a dry-type transformer is used, and the risk of a substation fire is significantly lowered, the equipment at the substation still has a risk of leaks or spills. Therefore, the Applicant should provide more detail of the hazardous and polluting substances anticipated to be present within Substation plant and equipment, including transformer type, and the design and operational measures to contain these substances, such as:

- Secondary containment systems such as double-skinned tanks and bunding;

- Leak detection and level monitoring systems;
- Bund water management;
- Oil water interceptors/separators in the drainage system.

Oil containment must be in accordance with the Control of Pollution (Oil Storage) Regulations 2001 and the Applicant should employ best practice pollution controls for oils and other hazardous and polluting substances. Further information available here: [Pollution prevention for businesses - GOV.UK](https://www.gov.uk/guidance/pollution-prevention-for-businesses)

In accordance with Section C of 'The Environment Agency's Approach to Groundwater Protection' we could not support the siting of a BESS anywhere within Zone 1 and/or Zone 2 of a Groundwater Source Protection Zone, and encourage this to be repositioned to a less sensitive groundwater location.

The applicant should provide a detailed drainage plan for the site. This information must satisfactorily demonstrate that the risks to controlled waters have been fully understood and can be addressed through appropriate measures. This information should include, but not be limited to:

- A detailed drainage plan which demonstrates, in the event of an emergency, that contaminated firewater can be adequately contained within the site to ensure that there is no discharge of polluted water to ground or surface water bodies. The scheme should include an impermeable base or layer beneath the battery unit compound to ensure infiltration beneath the site can be controlled.
- Any system for the storage of contaminated firewater should have sufficient capacity/headroom for the volumes expected in the event of a fire, even during periods of intense rainfall.
- The system for containing firefighting effluent should be automatic with a backup system in place in case of power failure.

Environmental permits

If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in [The Water Abstraction and Impounding \(Exemptions\) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works](#). It may also require a discharge permit if it falls outside of our [regulatory position statement for de-watering discharges](#).

If the applicant does not meet the exemption and requires a full abstraction licence, applicants should be aware that some aquifer units may be closed for new

consumptive abstractions in this area. More information can be found on GOV.UK: [Abstraction licensing strategies \(CAMS process\)](#) and [Apply for a water abstraction or impounding licence](#).

If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

Please note that the typical timescale to process a licence application is 9-12 months. [The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.](#)

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: [Temporary dewatering from excavations to surface water: RPS 261](#). Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: [Discharges to surface water and groundwater: environmental permits](#).

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- CL:AIRE Definition of Waste: Code of Practice
- EA Regulatory Position Statement 215: Treating small volumes of contaminated soil and groundwater

Sustainable drainage systems

The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed
- meet Government's non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency's approach to groundwater protection, position statement G13: [Groundwater protection position statements](#).

Geomorphology considerations

The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as Horizontal Directional Drilling (HDD) to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be

exposed by future coastal erosion or river movement, becoming an impediment to natural processes.

- Consider opportunities to deliver WFD mitigation measures/BNG uplift as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

Notes:

1. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.
2. Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that waterbody.
3. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric. *[BNG guidance is mentioned here because our [EA] usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse.]*
4. Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the EA.
5. Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
6. Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk)). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).

7. If river crossings (bridges, culverts, and buried cables) are required as part of the development, we [EA] would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance in regard to river crossings can be found in the following document: SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

Watercourse sensitivity

- Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.

Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

From: FS, Yorkshire and North East Area <yne@forestrycommission.gov.uk>
Sent: 04 June 2026 16:41
To: Ray II Wind Farm <RayIIWindFarm@planninginspectorate.gov.uk>
Subject: Re: EN0110031 - Ray II Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification

Hello,

Thank you for seeking the Forestry Commission's advice about the impacts that this application may have on the trees and woodland identified in this proposed application. As a Non-Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather, we are providing information on the potential impact that the proposed development could have on trees and woodland habitats. The Forestry Commission is pleased to provide you with the following information that may be helpful when you consider the application:

- Details of Government policy relating to ancient woodland and ancient & veteran trees
- Information on the importance and designation of ancient woodland and ancient & veteran trees
- Details of Government policy relating to non-ancient woodland and trees

Ancient Woodlands (ASNW/PAWS) and Ancient & Veteran Trees (AVT)

Ancient woodlands, ancient trees and veteran trees, are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed, including immensely complex ecological processes and relationships, above and below the ground. This applies equally to Ancient Semi Natural Woodland (ASNW), Plantations on Ancient Woodland Sites (PAWS), ancient trees and veteran trees (AVT).

It is Government policy to refuse development that will result in the **loss or deterioration** of irreplaceable habitats including **ancient woodlands, ancient trees and veteran trees**, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 186c). It is not possible to fully compensate for the loss of an irreplaceable habitat.

The Forestry Commission advises that the most up-to-date Ancient Woodland Inventory (AWI) should be used throughout the assessment process. The inventory has recently been updated. The Applicant should also refer to the Woodland Trust Ancient Tree Inventory and any other relevant datasets to identify ancient, veteran and notable trees that may be affected by the proposed development.

The Environmental Statement should clearly identify, map and assess all ancient woodland (ASNW, PAWS), ancient trees, veteran trees (AVT) and notable trees within the Site and all cable corridor options. The assessment should distinguish between these resource types and consider both direct and indirect impacts.

An Arboricultural Impact Assessment should identify all ancient, veteran and notable trees (including any ancient trees and veteran trees not recorded in the inventories/datasets above) potentially affected by the proposed development and assess impacts arising from construction, operation, maintenance and decommissioning activities across the lifetime of the project.

Biodiversity Duty and Policy Context

Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, as amended by the Environment Act 2021, the biodiversity duty requires public authorities (including when exercising their functions under the planning system) to have regard to the purpose of conserving and enhancing biodiversity.

The Environmental Statement should demonstrate consideration of the Environment Act 2021 biodiversity targets, including the statutory targets to:

- Halt the decline in species abundance by 2030.
- Increase species abundance so that by 2042 it is greater than in 2022, and at least 10% greater than 2030.

- Improve the Red List Index for England species extinction risk by 2042, compared to 2022 levels. (Noting that the Government commissioned a report which was published in April 2026 as the England Red Squirrel Recovery Strategy and that red squirrels are listed as Endangered on Britain's Red List for terrestrial mammals)
- Restore or create in excess of 500,000 hectares of wildlife-rich habitats outside of protected sites by 2042. A new interim target was also set within the EIP23 to restore or create 140,000 hectares of a range of wildlife-rich habitats outside protected sites by 2028.

These targets are directly relevant to trees, woodlands and associated habitat impacts within the scheme.

Ancient Woodland Buffer Zones

Paragraph 9.5.2 of the Scoping Report states that woodland listed on the Ancient Woodland Inventory will be avoided and that a 15 m buffer will be maintained between ancient woodland and the proposed development.

The Forestry Commission notes that 15 m represents the minimum buffer identified within standing advice and should not be assumed to be sufficient in all circumstances. Buffer distances should be informed by site-specific assessment and should be sufficient to avoid deterioration of ancient woodland arising from direct and indirect impacts.

This should include, but not be limited to, impacts on root protection areas, hydrology, soil compaction, edge effects, shading, pollution, vibration, dust, construction activity, access requirements, operational maintenance and decommissioning.

Woodland Baseline

Paragraph 7.3.6 states that modern plantation woodland is limited to the south-western extent of the site around Black Burn. The Forestry Commission notes that the National Forest Inventory indicates substantially greater woodland cover across the western section of the Site.

Whilst some areas may have been recently felled, these remain woodland in land-use terms and may be subject to restocking or natural regeneration under standard forestry management cycles. The baseline should therefore accurately reflect the extent of woodland recorded within the National Forest Inventory and clearly distinguish between temporarily unstocked woodland and permanent land-use change.

Trees and woodland outside of AWI-designated sites should also be scoped into the assessment where they may be affected by the Proposed Development.

Woodland Loss, Tree Canopy and Compensatory Woodland Creation

The western section of the Site comprises extensive commercial woodland and the Scoping Report acknowledges that woodland removal will be required to facilitate development.

Government policy strongly supports **increasing tree and woodland cover in England**, including commitments to:

- Reach **16.5% tree and woodland cover in England by 2050** (Tree Action Plan for England)
- Increase woodland creation rates to support net zero and biodiversity objectives
- Deliver landscape-scale nature recovery through the Environmental Improvement Plan 2023
- Contribute to the England Trees Action Plan ambition to expand woodland creation and tree canopy cover

Where woodland loss is unavoidable, the Forestry Commission encourages the Applicant to provide robust justification and to consider significant compensatory woodland creation, planting of trees outside of woodlands, hedgerow creation and habitat enhancement measures that exceed the area of permanent woodland loss and contribute positively to local woodland networks and landscape-scale connectivity.

The Environmental Statement should clearly quantify:

- Temporary woodland removal
- Permanent woodland removal
- Woodland retained
- Areas subject to restocking or natural regeneration
- Proposed compensatory woodland creation, planting of trees outside of woodlands, hedgerow creation and habitat enhancement measures

This information is necessary to assess the scheme in the context of national policy objectives relating to climate mitigation, biodiversity recovery, and woodland and tree canopy cover expansion.

Red Squirrel Habitat

The Forestry Commission notes that a substantial proportion of the western section of the Site lies within a designated red squirrel reserve.

The Environmental Statement should assess not only direct habitat loss but also potential fragmentation, disruption of woodland connectivity, edge effects, construction disturbance, impacts on movement corridors used by red squirrels and potential changes in squirrel behaviour in response to the presence of wind turbines.

Where impacts are identified, consideration should be given to woodland creation, woodland enhancement and habitat connectivity measures at a landscape scale to support long-term population resilience. Consideration should also be given to the ecological lag time required for newly planted woodland to develop sufficient cone/seed production to function as effective habitat.

Although outside formal red squirrel reserves, records of red squirrel presence exist throughout the cable corridor options; therefore, disturbance and displacement impacts should also be assessed. Red squirrels are classified as endangered in England on Britain's Red List for terrestrial mammals. Distribution data is available via Red Squirrels Northern England (RSNE).

Cable Corridor Options

The Forestry Commission advises that all cable corridor options should be assessed for potential impacts on:

- Ancient woodland (ASNW and PAWS)
- Ancient trees
- Veteran trees
- Existing woodland habitats and ecological connectivity

All such features should be clearly mapped and assessed within the Environmental Statement and avoided wherever possible through route refinement.

Conclusion

The Forestry Commission considers that trees/woodland , ancient woodland, ancient trees, veteran trees and red squirrels/habitat should remain scoped into the Environmental Impact Assessment.

The Environmental Statement should demonstrate full consideration of statutory biodiversity duties, national woodland expansion policy and environmental improvement targets, and should provide sufficient information to assess direct, indirect and cumulative effects on these receptors.

What is most important to the Forestry Commission is that there will be no loss or detrimental impact as a result of this proposed development on ancient woodland, ancient trees and veteran trees as mentioned above, with an overall net gain delivered for tree and woodland cover, and the biodiversity of their associated habitats.

We hope these comments are helpful to you. If you have any further queries please do not hesitate to contact the Forestry Commission at this email address provided.

With thanks,

Dan Brown

Local Partnership Advisor

Yorkshire and North East Area

Foss House, King's Pool

1-2 Peasholme Green

York

YO1 7PX

Tel 0300 067 4900

Date: 13 May 2026
Our ref: EIASCO/26/002
Your ref: EN0110031

The Planning Inspectorate
Environmental Services
Infrastructure Decisions
And Applications Service
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

For the attention of : Karen Wilkinson

By email to : RayIIWindFarm@planninginspectorate.gov.uk

Dear Ms Wilkinson

**APPLICATION BY VATTENFALL FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE RAY II ONSHORE WINDFARM
DEVELOPMENT IN NORTHUMBERLAND (20 WIND TURBINES UPTO 155
METRES).**

**(EIA) SCOPING CONSULTATION AND NOTIFICATION OF
ENVIRONMENTAL IMPACT ASESSEMENT.**

Thank you for your letter dated 7 May 2026.

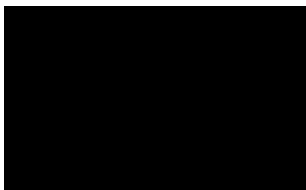
I understand that the applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its opinion (a scoping opinion) as to the information to be provided in the Environmental Statement (ES) to the proposed development, which is a Nationally Significant Infrastructure Project (NSIP). It is noted that the proposed development is currently in the pre application stage.

I have reviewed the information accompanying the request for a scoping opinion, via the link contained in your letter, and can confirm that Gateshead Council has **no comments** to make on the information to be provided in the Environmental Statement in this instance, given that the site/proposed development is a significant distance from the administrative boundary of Gateshead Council.



Should you wish to discuss this response further then please contact me on [REDACTED] or at [REDACTED] [@gateshead.gov.uk](mailto:[REDACTED]@gateshead.gov.uk).

Yours sincerely



Tracy Long
Senior Planner
Development Management
Climate Change, Compliance, Planning and Transport
Economy Innovation and Growth
Gateshead Council

Environmental Services
Infrastructure Decisions and
Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

Chemicals, Explosives and
Microbiological Hazards
Division – Unit 4

NSIP Consultations
Land Use Planning Team
Building 1.2,
Redgrave Court,
Bootle L20 7HS

Date: 2nd June 2026

NSIP.applications@hse.gov.uk

References: CM9 Ref: 4.2.1.7465.
NSIP Ref: EN0110031
FAO: Karen Wilkinson

<http://www.hse.gov.uk/>

Dear Karen,

**PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) –
REGULATIONS 10 AND 11
APPLICATION BY VATTENFALL (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT
CONSENT FOR THE RAY II WIND FARM (THE PROPOSED DEVELOPMENT) HSE'S LAND USE
PLANNING ADVICE**

Thank you for your letter of 7th May 2025 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's Land Use Planning Advice

Will the proposed development fall within any of HSE's consultation distances?

Reviewing the layouts given in the above the cable route corridors proposed fall within the Consultation Zones of an MAH pipelines. Please see the list attached in Appendix 1 a (MAH sites) & 1b (MAH pipelines).

The Applicant should contact the operators of MAH sites (see Appendix 1a), to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

Since the works will entail underground cabling and access routes, HSE strongly recommends that at the earliest opportunity, the applicant liaises with the pipeline operators (see Appendix 1 b). There are three particular reasons for this:

- i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
- iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

Would Hazardous Substances Consent be needed?

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3.

Appendix 1

a. Major Accident Hazard sites:

	HSE Reference	MAH site Operator	MAH site Address
1	n/a	n/a	n/a

b. Major Accident Hazard pipelines:

HSE ref: 6904 Pipeline operated by Sabic, ICI Wilton/Grangemouth Ethylene Pipeline

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development (turbines are not defined as a building).

Electrical safety

No comment from a planning perspective

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours faithfully,

**CEMHD4
NSIP Consultation Team**

Direct Dial: 01904 601858

Our ref: PL00801127

PINS ref.: EN0110031

By email

Date: 19 May 2026

Dear Madam or Sir,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Vattenfall (the applicant) for an Order granting Development Consent for the Ray II Wind Farm (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for your communication of 07 May 2026 consulting Historic England on the above EIA Scoping Report.

The scheme is outlined in the Consultation Documents provided as a link to the documentation website online. The documents which the following comments refer to are:

- EN0110031-000014 Ray II Wind Farm – Scoping Report
- EN0110031-000013 Ray II Wind Farm – Scoping Report – Appendix A – Summary of Questions for Consultees
- EN0110031-000016 Cultural Heritage and Archaeology Baseline: Vattenfall Ray II Windfarm (UK) – Technical Appendix 7.1
- EN0110031-000015 Ray II Wind Farm – Commitments Register
- EN0110031-000011 Appendix B Part 1

In relation to Listed Buildings, the remit for detailed comments and advice on Grade II Listed Buildings largely lies with the relevant Local Authority Conservation Officers.

The remit for detailed comments and advice on non-designated archaeological remains largely lies with the relevant Local Authority Archaeological Advisors. However, our advice, includes comments on the submitted documents relating to the archaeological assessments and mitigation proposals, as well as suggestions of further detail we would expect to see presented in the Environmental Statement (ES) and Archaeological Mitigation Strategy.

Project summary

We understand the Proposed Development will comprise up to 20 turbines with a tip height up to 230m, a BESS, on-Site substation, associated grid connection of approximately 20 km to connect to Fourstones Substation and other associated infrastructure. The Proposed Development is anticipated to generate a capacity of approximately 166 MW.

Historic England's Advice

Having reviewed the EIA Scoping Report and Technical Appendix, we note the principal infrastructure has the potential to have direct and indirect impacts on heritage assets.

These would include built heritage and buried archaeology of both designated and undesignated status.

General Points

We welcome the proposed programme of assessments such as the Landscape Visual Impact Assessment and the Cumulative Landscape Visual Impact Assessment. However, the impact on the significance of heritage assets needs to be specifically included in the assessment, and not just the impact on views.

We also welcome the inclusion of the impact of aviation lightning in the assessment of the impact on the landscape. Again, this assessment needs to be undertaken to specifically understand the impact on the significance of heritage assets rather than the general surroundings of the Proposed Development.

In this regard, it will be necessary to provide models or ZTV from both looking out from the proposed development and from the heritage assets included in the study area. It is important the ES identifies key locations from which to assess the impact on the significance through change to the setting of key highly graded heritage assets. We would be pleased to work with the applicant to agree these in advance. The photographs should be taken in winter to model worse-case scenarios. This is to ensure that an appropriate assessment of the impact on the significance of highly graded designated assets is undertaken.

We note the emphasise on the visual impact of the Proposed Development. In addition to views and vibration, it is important to scope in any impact of noise and lighting in the heritage chapter of the ES.

We would recommend scoping in a potential to enhance the heritage assets impacted on by the Proposed Development through improved interpretation or active community engagement.

Specific Points

In the Scoping Report (e.g., chapter 7.3.2.1) we note that this makes a distinction between direct and indirect impact and effects on heritage assets.

We strongly recommend not to introduce this distinction but rather to focus on the impact on the significance of such assets, regardless of whether the impact is direct or indirect.

For the study areas mentioned in the Scoping Report (chapter 7.3.2) Historic England needs to be consulted in addition to the mentioned LPAs. In particular regarding designated heritage assets impacted by the Proposed Development. We would also need to advice on the heritage assets with potential to be of equivalent to nationally significant heritage assets.

We welcome the intention in the Scoping Report (chapter 7.3.2.3) not to use the study areas as arbitrary cut-off points but to propose a flexible approach to the assessment of heritage assets associated with the 15km study area.

We note that vibration has been mentioned in the Scoping Report in chapter 7.3.3.2. It would be necessary to assess the impact of vibration on heritage assets in the study areas, as it should not be categorically ruled out that such impact would not be 'typically fully reversible' but might have a permanent, irreversible impact.

Chapter 6 scopes in lightning effects from aviation lights during the operational phase of the Proposed Development. We would like to see the lightning effect also scoped in for the impact on heritage assets.

Chapter 7.5.3 of the Scoping report defines the setting assessment approach, and we would like to discuss viewpoints from heritage assets going outwards to ensure that the setting has been appropriately understood. Also, the dynamic setting assessment to understand the impact of experiential setting assessment should be detailed.

Hadrian's Wall WHS

This section responds to the Scoping Report, Chapter 7.6.2. Given the significance of the Roman Frontiers WHS of Hadrian's Wall you agreed to produce a Heritage Impact Assessment (HIA), in line with UNESCO's guidance on such assessment, and we welcome this.

UNESCO is clear in its guidance that HIA needs to be undertaken at the earliest possible stage, and then used in shaping any proposal made, rather than simply to understand the impact of a proposal once fully formed.

This assessment will need to consider potential impact and mitigation of impacts on the significance of the WHS for both the windfarm itself, but also from the construction of the cable route, including the visual assessment.

Regarding Hadrian's Wall we want to point out that the harm to setting of Hadrian's Wall would result from harm to the ability to understand and appreciate Roman military planning and land use. As for other sites, the role of setting will be different, and we advise including a setting assessment for designated and non-designated sites.

Questions for Consultees

The following questions were provided in the Ray II Wind Farm – Scoping Report – Appendix A.

Q3.1 – Do consultees agree with the approach to the EIA and the general strategy for assessing the effects? YES

Q3.2 – Do consultees agree with the approach to the assessment of cumulative effects? YES

Q3.3 - Do consultees agree that developments that are in the scoping phase do not need to be considered as part of the cumulative assessment and will not be referred to in the ES? YES

Q3.4 - Can the consultees provide any further information on developments that they think should be referred to in the cumulative assessment? NO

Q7.1 – Do Consultees agree with the proposed methodology and scope of assessment? YES

Q7.2 – Do consultees have any information regarding current or recent archaeological work or projects being undertaken within or in the vicinity of the Proposed Development, particularly those whose results may not yet be recorded in the local HER datasets? NO

Q7.3 – Are consultees aware of any further sites with statutory protection within the wider landscape whose settings may be affected by the Proposed Development? YES

Q7.4 – Do consultees have details of any cultural heritage sites in the vicinity of the Proposed Development which they consider may raise significant issues within the ES process for this Proposed Development? NO

Q7.5 – Are consultees aware of any additional stakeholders who will require consultation or where consultation would be desirable? NO

Commitments Register

In response to the commitments Register, we would like to point out regarding commitment **Cult-05** that we suggest focussing on the impact on significance of heritage assets whether this is a direct or indirect impact.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely

Martina Tenzer

Inspector of Ancient Monuments

E-mail: [REDACTED]@historicengland.org.uk

Scoping Opinion: Kirkwhelpington Parish Council

Following an Extraordinary Meeting of the Parish Council on 28th May, the Council has resolved on a **neutral** opinion until more detailed information and plans are available.

The Council notes the current development plans are likely to fall within the Nationally Significant Infrastructure Project (NSIP) regime and welcome Vattenfall's willingness to consult with the Council and to host a drop-in session, where parishioners could ask questions to understand the current plans.

We look forward to working with Vattenfall to mitigate any concerns, and develop opportunities, and will seek to do this in partnership with the Parish Councils in Corsenside and Elsdon.

Looking towards the final planning application in 2027, we would, at this stage, register some concerns:

Overdevelopment:

The proposed development consists of up to 20 additional (and very much larger) wind turbines, concentrating a total of 36 wind turbines in a small area. The six proposed wind turbines to the East of the A696 (identified on plans as T1/T1/T3/T4/T15 and T16) are of particular concern as they may impact on some residents in that part of the village. In addition, whilst it is planned that any power generation will be fed to the Fourstones Substation by underground cable, the option of pylons at this stage is not discounted. The use of pylons would be a serious concern due to their impact on the local environment.

Traffic and road safety:

The A696 is a busy and dangerous road, particularly in the winter months. It is imperative that 'standing traffic' on this main route is avoided and mitigations be put in place.

Environmental concerns:

We appreciate Vattenfall's commitment in this area, however, of particular concern are the huge reinforcing concrete foundations through peat moorland.

Heritage and conservation:

Kirkwhelpington village is a conservation area and there is a concern that Ray II Wind Farm may have an impact on future planning permissions within the village. The current character and history of the village must be preserved.

The six proposed wind turbines to the East of the A696 (identified on plans as T1/T1/T3/T4/T15 and T16) are of particular concern as they may impact on some residents in that part of the village.

A major concern would be the potential use of pylons to feed Fourstones Substation.

Noise, pollution, or nuisance:

Inevitably, a process that is likely to take 2 years to completion is likely to create noise, pollution and nuisance – we look forward to understanding how these will be mitigated in the final development application.

David Binns
Clerk & RFO
Kirkwhelpington Parish Council



Defence Infrastructure Organisation

Kathe Kirimaa
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference: EN0110031

E-mail: DIO-Safeguarding-Wind@mod.gov.uk

Our reference: DIO10069963

www.mod.uk/DIO

Karen Wilkinson
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

04 June 2026

By email only

Dear Karen,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

Application by Vattenfall (the applicant) for an Order granting Development Consent for the Ray II Wind Farm (the proposed development).

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested.

Thank you for consulting the Ministry of Defence (MOD) in relation to the scoping consultation for the proposed Ray II Wind Farm.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I am writing to advise you that the MOD has concerns with the proposal.

It is anticipated that the proposed development will consist of a BESS, on-site substation, associated grid connection and other infrastructure, along with the erection of up to 20 turbines. The turbines will each have a maximum height to blade tip of 230 metres (m) above ground level (agl). The

development has been assessed using location data provided in the developer's document 'Ray II Wind Farm Scoping Report', dated May 2026.

Turbine no.	Easting	Northing
1	395224	589950
2	397424	588869
3	397654	588271
4	398234	587734
5	394157	588367
6	393738	588203
7	393309	588524
8	392363	588425
9	392303	588791
10	392256	589972
11	391789	589889
12	391652	588625
13	390883	589025
14	390971	589501
15	396041	589407
16	396765	590166
17	395166	588015
18	392176	589607
19	390877	588377
20	390529	588560

The principal safeguarding concerns of the MOD with respect to this wind farm proposal relate to the potential for the development to:

- be detectable by, and impact upon, the operation and capability of one of more MOD radars as specified below;
- impact on the operation and capability of technical assets deployed at or in support of the function of the RAF Spadeadam Electronic Warfare Tactics Facility; and
- introduce a physical obstruction to air traffic movements.

Air Traffic Control (ATC) Radar

The turbines will be 34.8km from and detectable by and will cause unacceptable interference to the ATC Radar at Spadeadam Berry Hill.

The turbines will be 33.4km from and detectable by and will cause unacceptable interference to the ATC Radar at Spadeadam Deadwater Fell.

The turbines will be 62.6km from and detectable by the ATC radar at Great Dunfell which provides a data feed to the Air Traffic Control Radar at Warton Aerodrome.

Wind turbines have been shown to have detrimental effects on the performance of Primary Surveillance Radars. These effects include the desensitisation of radar in the vicinity of the turbines, shadowing and the creation of "unwanted" aircraft returns which air traffic controllers must treat as aircraft returns. The desensitisation of radar could result in aircraft not being detected by the radar and therefore not presented to air traffic controllers. Controllers use the radar to separate and sequence both military and civilian aircraft, and in busy uncontrolled airspace radar is the only sure way to do this safely. Maintaining situational awareness of all aircraft movements within the airspace is crucial to achieving a safe and efficient air traffic service, and the integrity of radar data is central

to this process. The creation of "unwanted" returns displayed on the radar leads to increased workload for both controllers and aircrews. Furthermore, real aircraft returns can be obscured by a turbine's radar return, making the tracking of both conflicting unknown aircraft and the controllers' own traffic much more difficult.

Air Defence (AD) radar

The turbines will be 30.9km from, detectable by, and will cause unacceptable interference to the AD radar at RRH Brizlee Wood.

Wind turbines have been shown to have detrimental effects on the operation of radar. These include the desensitisation of radar in the vicinity of the turbines, and the creation of "false" aircraft returns. The probability of the radar detecting aircraft flying over or in the vicinity of the turbines would be reduced, hence turbine proliferation within a specific locality can result in unacceptable degradation of the radar's operational integrity. This would reduce the RAF's ability to detect and deter aircraft in United Kingdom sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the United Kingdom.

Threat Radar

The proposed development is in the vicinity of sites used by the RAF Spadeadam Electronic Warfare Tactics facility and may cause unacceptable interference to threat radars at these sites. Threat radars are employed during critical military exercises to train pilots against the common surface-to-air missile threats they will be faced with when on operations.

Physical Obstruction

In this case the development falls within Tactical Training Area 20 (TTA 20T), an area within which fixed wing aircraft may operate as low as 100 feet or 30.5 metres, and within Low Flying Areas 12 and 16 (LFA12, LFA16), areas within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above terrain features to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

To address this impact, and given the location and scale of the development, the MOD would request that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.

The development proposed includes wind turbine generators that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.

Grid Connection

Documents published by the applicant include a drawing titled 'Site Location' (Figure 1.1a) which provides, for information, an indication of grid connection corridors under consideration for the alignment of the grid connection between the site and the existing Fourstones Substation. The document 'Ray II Wind Farm Scoping Report', dated May 2026, acknowledges that the grid connection is at very early stages of design, and that the final route chosen will be narrower than the current corridors shown, which are approximately 1km in width. This report also states that the form the grid connection will take - underground cables, overhead line or a combination of the two - has yet to be determined.

The MOD has completed an assessment of the routes and has identified that the southern ends of the corridors pass through the statutory safeguarding Birdstrike zone for RAF Spadeadam. It is not possible at this stage to advise as to the significance of the impact of the development. It has also been identified that elements of the northern part of the proposed grid connection Route Option 1 pass through Tactical Training Area 20T (TTA 20T). Within this area, fixed wing aircraft may operate as low as 100 feet or 30.5 metres and therefore, should overhead lines be proposed within this area, consideration must be given to maintaining aviation safety. The MOD should be consulted on any changes to the proposed grid connection route and/or any formal applications for that grid connection route so that necessary assessments can be completed and MOD can make representations in the event that this element of the development would impact on the operation or capability of MOD sites or assets, or on operational or training activity.

Summary

The MOD has concerns with respect to this wind farm proposal due to the development's potential to:

- be detectable by, and impact upon, the operation and capability of one of more MOD radars as specified above;
- impact on the operation and capability of technical assets deployed at or in support of the function of the RAF Spadeadam Electronic Warfare Tactics Facility; and
- introduce a physical obstruction to air traffic movements.

The MOD must emphasise that the advice provided within this letter is in response to the information detailed in the developer's document titled 'Ray II Wind Farm Scoping Report', dated May 2026 and in the developer's figures 'Figure 1.1a Site Location', dated 2026-05-06 and 'Figure 2.1 Site Layout', dated 2026-04-30. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following website:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely,



Kathe Kirimaa
Assistant Safeguarding Manager

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Sent: 22 May 2026 11:42

To: Ray II Wind Farm <RayIIWindFarm@planninginspectorate.gov.uk>

Subject: RE: EN0110031 - Ray II Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification [SG40272]

Our Ref: SG40272

Dear Sir/ Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams. In the timeframe given to us we have been unable to thoroughly investigate the effects of the proposed development on our Operations, however, the relevant teams are being consulted.

Based on our preliminary technical findings, the proposed development does conflict with our safeguarding criteria. Accordingly, NATS (En Route) plc **objects to the proposal**. We will notify you within 4-6 weeks of the results of our operational assessment. Only if this assessment shows the impact to be acceptable will we be able to withdraw our objection.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission for a wind farm. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are further obliged to notify both NATS and the Civil Aviation Authority ("CAA") of that fact (which may lead to the decision made being subject to review whether by the CAA referring the matter for further scrutiny or by appropriate action being taken in the courts).

As this further notification is intended to allow the CAA sufficient time to consider whether further scrutiny is required, we understand that the notification should be provided prior to any granting of permission. You should be aware that a failure to consult NATS, or to take into account NATS's comments when deciding whether to approve a planning application, could cause serious safety risks for air traffic.

If you have any queries regarding this matter you can contact us using the details as below.

Yours faithfully

The NATS logo, consisting of the word "NATS" in a bold, blue, sans-serif font.

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

Date: 04 June 2026
Our ref: 548355
Your ref: EN0110031



Karen Wilkinson
Senior Environmental Advisor
Planning Inspectorate
RayIIWindFarm@planninginspectorate.gov.uk

Consultations
Hornbeam House
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Electra Way
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CW1 6GJ

T 0300 060 900

BY EMAIL ONLY

Dear Karen Wilkinson

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Application by Vattenfall (the applicant) for an Order granting Development Consent for the Ray II Wind Farm (the Proposed Development)

Location: Ottercops Moss, Kirkwhelpington, Northumberland

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 07 May 2026, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO).

Detailed advice on scoping the Environmental Statement is available in the following attached Annexes:

- Annex A – Natural England's Advice on EIA Scoping
- Annex B – Natural England's Responses to questions presented within Scoping Report – Appendix A Summary of Questions to Consultees
- Annex C – Natural England's detailed comments on the Scoping Report
- Annex D – Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)

Summary of key concerns

A summary of Natural England's most urgent concerns regarding the scope of the assessment for the Proposed Development is set out below:

Effects on peatlands

It is critical that the Environmental Statement considers effects on peatlands in their entirety rather than as just deep peat/shallow peat. The supporting hydrological environment needs to be properly understood and any impacts identified, given its importance in sustaining the complex ecohydrology and hydrochemistry of these peatlands. Natural England recommend

a detailed understanding of water pathways is required to accurately identify, quantify and mitigate potential development impacts.

Natural England considers that irreversible damage to peatland is highly likely with the Proposed Development and therefore compensation measures should be considered early as the design develops.

There have been restrictions placed on restoration schemes in the vicinity of the Ray I turbines, with exclusion zones around the turbines in place of up to 150 m. If this is applied across the Ray II site it will have the effect of preventing further peatland restoration and increasing the impact of the development even further beyond the scheme footprint (turbines, roads, cables etc) and its hydrological impact. Natural England notes that if this restriction is placed on the Proposed Development this is likely to have major implications for government funded plans to restore peatland habitats in line with targets set out in the Environment Act 2021. If a restriction zone will be put in place for Ray II, the impacts of this should be considered in the Environmental Statement as part of the operational phase.

Landscape and Visual Impacts

The windfarm site (hereafter referred to as the Site) is surrounded by the Northumberland National Park on the north, west and south-west and all the cable corridor options pass through the south-eastern corner. The applicant should assess the scope for locating the cable route options outside of Northumberland National Park and minimising impacts from the proposed development. Impacts from the cable route and turbines within the setting of the national park should be carefully considered.

Effects on the North Pennine Moors Special Protection Area (SPA) from the Site

Natural England does not agree that effects on the North Pennine Moors SPA can be scoped out of the assessment as records of golden plover have been recorded at the site and therefore an assessment of the site's potential as functionally linked land for the SPA is required.

Cable Corridor Ornithological Study Areas

Maximum ranges for several key ornithological features to be considered are greater than the proposed 5 km study area for impacted European sites/relevant bird populations for the cable corridor. Natural England advises that this should be increased from 5 km to at least 15 – 18 kms.

Increasing the study area will mean that more of the potential cable corridor route will be scoped in for impacts on functionally linked land connected with the North Pennine SPA and that other designated sites with ornithological features should be scoped in (e.g. Harbottle Moors SSSI to the north may be in scope). Natural England does not have access to a digital boundary of the cable corridor options to be able to check which Sites of Special Scientific Interest (SSSIs) should be included. Other relevant SSSI citations should therefore be checked and incorporated into the desk study and survey parameters, where appropriate.

Scoping in Northumberland Shore SSSI

Natural England advises that the Northumberland Shore SSSI should be scoped into the assessment as we are aware that wintering golden plover travel inland towards the moorlands and therefore could be using the site.

Other advice

Natural England highlights that wildfire is a concern in this area due to the combination of deep peat, heather heath and forestry activities. Additional windfarm infrastructure is likely to be possible cause of fires and there will be risk to infrastructure including battery storage. We advise that you seek the Northumberland Fire Services views on the Proposed

Development.

The Applicant has entered into a Discretionary Advice Service agreement with Natural England. We welcome this engagement and encourage Vattenfall Wind Power Ltd to use this service, prior to submission of the application, to address our key concerns raised in this letter and for any further advice.

For any further advice on this consultation please contact the case officer Caroline Jewell and copy to consultations@naturalengland.org.uk.

Yours sincerely

Caroline Jewell
Northumbria Area Team

Annex A – Natural England’s Advice on EIA Scoping

1. General principles

1.1. Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

1.2. From the Scoping report provided, Natural England consider that these general principles **will** be appropriately addressed through the EIA process.

2. Cumulative and in-combination effects

2.1. An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects
- b. approved but uncompleted projects
- c. ongoing activities
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

3. Environmental data

- 3.1. Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.
- 3.2. Detailed information on the natural environment is available at www.magic.gov.uk.
- 3.3. Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).
- 3.4. Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre ([ERIC North East - Environmental Records Information Centre](#)), the local Wildlife Trust, local geo-conservation group or other recording society.
- 3.5. Natural England note that records of golden eagle have been noted in the desk study at Simonside. We advise you request further data on reintroduced golden eagle from Restoring Upland Nature (Email: cat@restoringuplandnature.co.uk).

4. Biodiversity and geodiversity

- 4.1. The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.
- 4.2. Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5. Designated nature conservation sites

International and European sites

- 5.1. The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

- 5.2. Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.
- 5.3. Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available [here](#).
- 5.4. Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#). You can access this information through [NE Maps](#).
- 5.5. The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**.
- North Pennine Moors SPA
- 5.6. Table 1 sets out the potential risks of the Proposed Development on this site.

Table 1: Potential risk to international designated sites		
Site name with link to conservation objective	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
North Pennine Moors SPA	Breeding golden plover <i>Pluvialis apricaria</i> Breeding hen harrier <i>Circus cyaneus</i> Breeding merlin <i>Falco columbarius</i> Breeding peregrine <i>Falco peregrinus</i>	Loss of functionally linked land directly and indirectly from the turbines and infrastructure. Degradation of functionally linked land through damage to peatlands from the proposed development. Mortality via collision with turbines and displacement.

Nationally designated sites

Sites of Special Scientific Interest

- 5.7. Sites of Special Scientific Interest (SSSI) are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.
- 5.8. The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

5.9. Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

5.10. The development site is within or may impact on the following **Site of Special Scientific Interest**:

- New Scroggs SSSI
- Wharmley Riverside SSSI
- Gunnerton Nick SSSI
- Tyne Watersmeet SSSI
- Stonecroft Mine SSSI
- Simonside Hills SSSI
- Mill and Whiskershiel Burn SSSI
- Billsmoor Park and Grassless Wood SSSI
- Allendale Moor SSSI
- Whitfield Moor Plennmeller and Asholme Commons SSSI,
- Muggleswick, Stanhope and Edmundbyers Commons and Blanchland Mooors SSSI.
- Northumberland Shore SSSI

5.11. Table 1 sets out the potential risks of the Proposed Development on these sites.

Table 2: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
New Scroggs SSSI	Lowland calcareous grassland Lady's mantle <i>Alchemilla micans</i>	Direct habitat loss from the cable. Indirect effects from changes in air quality resulting from increased traffic.
Wharmley Riverside SSSI	Lowland calaminarian grassland	Indirect effects from changes in air quality resulting from increased traffic.
Gunnerton Nick SSSI	Lowland calcareous grassland Lowland dry acid grassland	Indirect effects from changes in air quality resulting from increased traffic.
Tyne Watersmeet SSSI	Invertebrate assemblage associated with stream and river margins Invertebrate assemblage associated with riparian sands	Indirect effects on supporting habitats from changes in air quality resulting from increased traffic.
Stonecroft Mine SSSI	Young's hellebourn <i>Epipactis youngiana</i> Vascular plant assemblage	Indirect effects on the extent of features from changes in air quality resulting from increased traffic.
Simonside Hills SSSI	Blanket bog and valley bog Short sedge acidic fen Subalpine dwarf-shrub heath Upland oakwood Wet heath	Indirect effects on habitats from changes in air quality resulting from increased traffic.

Table 2: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
	Wet woodland	
Mill and Whiskershiel Burns SSSI	Alkaline fen Lowland calcareous grassland Mire grassland and rush pastures Blue Moor-grass <i>Sesleria caerulea</i>	Indirect effects on habitats from changes in air quality resulting from increased traffic.
Billsmoor Park and Grasslees Wood SSSI	Upland oakwood Wet woodland	Indirect effects on habitats from changes in air quality resulting from increased traffic.
Whitfield Moor Plenmeller and Asholme Commons SSSI	Assemblages of breeding birds - Upland moorland and grassland with water bodies	Collision risk from turbines and loss/degradation of habitat
Allendale Moor SSSI	Aggregations of breeding birds - curlew, <i>Numenius arquata</i> Aggregations of breeding birds – golden plover, <i>Pluvialis apricaria</i> Aggregations of breeding birds - merlin, <i>Falco columbarius</i> Assemblages of breeding birds - Upland moorland and grassland without water bodies	Collision risk from turbines and loss/degradation of habitat
Muggleswick, Stanhope and Edmundbyers Commons and Blanchland Moors SSSI	Aggregations of breeding birds - golden plover Aggregations of breeding birds - merlin Assemblages of breeding birds - Upland moorland and grassland with water bodies	Collision risk from turbines and loss/degradation of habitat
Northumberland Shore SSSI	Aggregations of non-breeding birds - golden plover	Collision risk from turbines and loss/degradation of habitat

Regionally and Locally Important Sites

- 5.12. The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group. Where impacts cannot be avoided, the ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving

connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

6. Protected species

- 6.1. The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).
- 6.2. The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.
- 6.3. The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.
- 6.4. The Scoping Report provides summaries of the surveys undertaken to date of the wind farm site and lists the survey proposed in 2026 for the wind farm site (described in Paragraph 9.5.4.1) and cable corridor (Described in Paragraph 9.5.4.2).
- 6.5. Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.
- 6.6. Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) for details of the LONI process.

District Level Licensing for great crested newts

- 6.7. Natural England is aware that Vattenfall Wind Power Ltd is considering applying to use the District Level Licensing (DLL) scheme for great crested newts (GCN).
- 6.8. Where strategic approaches such as DLL for GCN are used, a Letter of No Impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact

Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

- 6.9. The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).
- 6.10. The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.
- 6.11. By demonstrating that the [DLL scheme for GCN](#) will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

7. Priority Habitats and Species

- 7.1. Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites.
- 7.2. Lists of priority habitats and species can be found [here](#). The Scoping Report notes that the wind farm site includes priority habitats including lowland and upland heathland and blanket bog.
- 7.3. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.
- 7.4. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).
- 7.5. An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.
- 7.6. The ES should include details of:
 - Any historical data for the site affected by the proposal (e.g. from previous surveys)
 - Additional surveys carried out as part of this proposal
 - The habitats and species present
 - The status of these habitats and species (e.g. whether priority species or habitat)
 - The direct and indirect effects of the development upon those habitats and species
 - Full details of any mitigation or compensation measures
 - Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

- 7.7. The cable corridor route options overlap with the Boat Banks Ancient Woodland.
- 7.8. The Scoping Report states in Paragraph 9.5.2 that any woodland listed on the Ancient Woodland Inventory will be avoided and there will be a buffer of 15 m between the woodland and the Proposed Development.
- 7.9. The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.
- 7.10. Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. The Overarching National Policy Statement for Energy (EN-1) sets out in Paragraph 5.4.33 that the assessment of ancient woodland, ancient and veteran trees should include measures to mitigate fully any direct or indirect effects of development during construction and operational phases. Paragraph 5.4.55 of EN-1 states the Secretary of State should not grant development consent that would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- 7.11. Paragraph 193 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.
- 7.12. Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.
- 7.13. The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.
- 7.14. Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

8. Biodiversity net gain

- 8.1. The Scoping Report confirms that the Proposed Development is committed to achieving over 10 % Biodiversity Net Gain (BNG) through habitat retention, enhancement and creation.
- 8.2. Whilst Natural England are not the statutory consultee with regard to BNG, and as such will not make detailed comments on metric calculations and compliance, we would welcome further discussion with the applicant regarding their approach to BNG delivery for this project and the opportunities it poses for enhancement.
- 8.3. BNG will become mandatory for all NSIP applications made on or after 2 November 2026. The government has recently published Biodiversity gain statements for nationally significant infrastructure projects available [here](#) and updated guidance available [here](#).

9. Landscape

Nationally designated landscapes

- 9.1. The development site is within or may impact on the Northumberland National Park and the North Pennines National Landscape.

Landscape and visual impacts

- 9.2. Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty.
- 9.3. The National Policy Statement for the relevant sector might have stronger protections. The Energy National Policy Statement EN-1 gives significant protection including within the setting of the protected landscape.
- 9.4. Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.
- 9.5. The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.
- 9.6. The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.
- 9.7. A landscape and visual impact assessment should also be carried out for the Proposed Development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks National Landscapes, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.
- 9.8. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.
- 9.9. To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the Proposed Development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high

standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit. The final selection of the cable corridor route and method of laying should consider the landscape sensitivities of this area.

- 9.10. The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

10. Heritage landscapes

- 10.1. The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.
- 10.2. Natural England will not be providing bespoke comments on the historic environment. We advise that Historic England should be consulted regarding this aspect of the ES.

11. Connecting people with nature

- 11.1. The ES should consider the potential impacts on the Hadrian's Wall Path National Trail. The National Trails website www.nationaltrail.co.uk provides further information.
- 11.2. The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.
- 11.3. Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.
- 11.4. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

12. Soils and agricultural land quality

- 12.1. Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed.
- 12.2. The following issues should be considered and, where appropriate, included as part of the ES:

- Soils as a site selection factor / constraint in temporary and permanent infrastructure.
- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

Peatlands

- 12.3. The peatlands in this location are complex high value ecosystems, featuring raised bogs, blanket bog, base-rich fens, acidic fens, and wet heath on sloping or thinner peats, including on peat of <10cm. It is critical that all parts of system are considered within the ES and that the significance of this thinner peat and the habitat it supports is adequately recognised.
- 12.4. Given the complexity and variety, it is critical that peatlands in the areas under consideration are considered in their entirety rather than as just deep peat/shallow peat. The supporting hydrological environment needs to be properly understood, and any impacts identified given its importance in sustaining the complex ecohydrology and hydrochemistry of these peatlands.
- 12.5. Paragraph 2.12.64 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) that access tracks and drains can have significant impacts on the structure and hydrology of peat and that designs should seek to avoid and then mitigate any such impacts. Paragraphs 2.12.75 – 2.12.80 of EN-3 provide specific considerations for onshore wind farm applications on peatlands.
- 12.6. Paragraph 10.3.6 of the Scoping Report notes that deep peat is classed as any peaty soils that are greater than 0.4 m in depth. Natural England has published [Definition of Favourable Conservation Status for Blanket bog - RP2967](#) in 2025, and deep peat is defined as peat of 0.3 m or more in depth. The ES should be updated in line with this definition.
- 12.7. There have been restrictions placed on restoration schemes in the vicinity of the Ray I turbines, with exclusion zones around the turbines in place of up to 150 m. If this is applied across the Ray II site it will have the effect of preventing further peatland restoration and increasing the impact of the development even further beyond the scheme footprint (turbines, roads, cables etc) and its hydrological impact. Clarification should be provided on the need and implementation of such exclusion zones for the Ray II windfarm. If the use of an exclusion zone cannot be avoided, the impacts of this should be assessed in the ES. Additionally, potential compensation for the inability to restore the peat should be explored.

Best Most Versatile Agricultural Land

- 12.8. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).
- 12.9. Natural England provisional mapping provides an indication of the Agricultural Land Classification (ALC) grade, and thus the potential impact on BMV agricultural land, it does not provide the soil details required to inform soil management which would feed into the Soil Management Plan. There is a risk of soil damage, ALC degradation and long term or permanent loss of BMV from cable installation. Soil will need to be

handled according to best practice and reinstated to a high standard to reduce the impacts. The results from a detailed ALC survey would provide soils data to inform a soil management plan for the whole site regardless of whether the use is permanent or temporary in nature.

- 12.10. Natural England require that land quality and soil resources information should be gathered for any land that is disturbed by the development, so the cabling route should be surveyed. Ideally a full detailed ALC survey would have been carried out across the whole site.
- 12.11. The ALC survey will enable a soil management plan to be generated for any areas to be disturbed (temporary and permanent) to ensure correct handling and restoration of soils, and onsite reuse of any surplus soils stripped from areas of permanent development.
- 12.12. All land which may experience temporary or permanent disturbance should be subject to a detailed ALC survey, to inform suitable handling and restoration.
- 12.13. A detailed ALC survey is required across the entire application site, covering both areas of permanent development (including panel locations, cable routes, and any areas of permanent sealing) and temporary development (such as construction access routes and working areas). The survey should also extend to land proposed for BNG, habitat creation, or similar environmental enhancements, ensuring all affected areas whether temporarily or permanently impacted are appropriately assessed
- 12.14. Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). However, survey density may be reduced to one point per 2 hectares if the ALC grade is mapped as Grade 4 or 5 and supported by homogeneous soil type (i.e. a clay soil across the full site). It would be expected for the applicant to provide clear justification where a detailed ALC survey is not proposed across the full site.
- 12.15. Further information is contained in [GOV.UK guidance](#) Agricultural Land Classification information is available on the [Magic](#) website
- 12.16. Natural England is aware of Post 1988 data that may be of interest regarding the cable corridor route options, should the proposed route include land that has already been surveyed it is expected that this data is to be used.
<https://publications.naturalengland.org.uk/publication/4817013055160320>
- 12.17. The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design. The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.
- 12.18. Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil

13. Air quality

- 13.1. Natural England advises that the potential for air quality impacts arising from this NSIP needs to be assessed. Natural England refers you to our standard advice on air quality impacts which can be found in Annex C. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on proposals with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution

14. Climate change

- 14.1. Whilst it is beyond Natural England's remit to provide detailed comment on the proposed climate change assessment, Natural England can provide the below recommendations.
- 14.2. The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 187), which should be demonstrated through the ES.
- 14.3. Avoidance of peatlands and other carbon sequestering habitats should also be specifically considered in the ES, with opportunities for their enhancement, e.g. via peatland restoration or woodland planting, being incorporated wherever possible to avoid oxidation. Further detailed comments on the Proposed Development likely effects on peatlands are provided in Section 11 of this letter and Annexes B and C.
- 14.4. Given the nature of the project, it is pertinent that all opportunities are taken to minimise the carbon footprint of the development and contribute to net zero not just via decarbonising industry, but also via good design and implementation of nature based solutions.
- 14.5. Further information is available from the Committee on Climate Change's (CCC) [Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme](#) (NAP), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).
- 14.6. The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. [Natural England's Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity and increase carbon capture.
- 14.7. The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change

mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the [British Ecological Society's nature-based solutions report](#) (2021) provide further information.

Annex B: Natural England's Responses to questions presented within *Scoping Report – Appendix A Summary of Questions to Consultees*

Chapter 3: EIA Process

Q3.1 – Do consultees agree with the approach to the EIA and the general strategy for assessing the effects?

Refer to Section 1 General Principles above.

Q3.2 – Do consultees agree with the approach to the assessment of cumulative effects?

Natural England agrees that the operational wind farms within 45 km of the Proposed Development should be scoped in and assessed as part of the baseline for this project. However, Natural England considers that a wider radius / search area would be appropriate as per NatureScot guidance, as outlined below.

The NatureScot guidance, 'Assessing the cumulative landscape and visual impact of onshore wind energy developments', states that '*a clear and legible search area base plan should be produced to show all of the following with a radius of up to 60km...*'.

The NatureScot guidance also states that '*sequential impacts may need to be assessed for a distance of more than 60km from the proposed wind farm*'.

Natural England advises that this may be appropriate when considering the sequential impacts for users of the Pennine Way National Trail. This is because, when the Proposed Development is considered in conjunction with the Calderdale Energy Park and the Hope Moor Wind Farm proposals, users of the Pennine Way are likely to experience views of large-scale wind farms (i.e. each with 20+ turbines that are 200m+ to tip height), on and off, from Kinder Scout, close to the start of the National Trail, in Peak District National Park, to The Cheviot, near the end of the 431km (268 mile) National Trail, in Northumberland National Park.

Q3.3 - Do consultees agree that developments that are in the scoping phase do not need to be considered as part of the cumulative assessment and will not be referred to in the ES?

This depends on the likelihood of these scoping phase developments; Section 2 *Cumulative and in-combination effects* above outlines the types of developments Natural England would expect to part of the cumulative impact assessment.

Q3.4 - Can the consultees provide any further information on developments that they think should be referred to in the cumulative assessment?

Refer to Section 2 *Cumulative and in-combination effects* above.

Chapter 6: Landscape and Visual Impact

Q6.1 – Are there any comments on the overall methodology proposed to assess effects on landscape and visual receptors, or to assess cumulative effects?

Refer to detailed comments on the methodology provided in Annex C.

Q6.2 – Are there any comments on the proposed Study Areas?

The Scoping Report states that a study area extending 45 km from the Site of the proposed wind farm has been adopted. Natural England considers that the extent of this study area is appropriate as this is in line with good practice guidance.

The Scoping Report states that a study area of 1km has been adopted for the cable corridor route options. Ideally, the study area should be based on a zone of theoretical visibility, as this would facilitate an assessment of visual effects during the construction phase. This is particularly important where the cable corridor comes in close proximity to:

- The Northumberland National Park;
- Designated heritage assets.

Please also refer to our more detailed comments in relation to the study area (Section 6.7.2 of the Scoping Report) in Annex C below.

Q6.3 – Are there any comments on the proposed list of assessment viewpoint locations?

Given that the Northumberland Coast National Landscape overlaps with the zones of theoretical visibility, Natural England recommends that there should be at least one assessment viewpoint within this National Landscape.

We recommend that there should be several viewpoints along the Pennine Way National Trail and Hadrian's Wall Path National Trail (assuming that there are multiple locations within the zones of theoretical visibility) to facilitate an assessment of the sequential experience of people using these National Trails.

The scale and quality of Figure 6.4 does not allow for a sufficient level of detail to assess the appropriateness of the viewpoints. The map figure would also benefit from the inclusion of national trails and the location of panoramic viewpoints where visitors would have views from within the national park such as mountain tops.

Q6.4 – Which viewpoints do you consider would be helpful to assess effects associated with aviation lighting?

Viewpoints that would be helpful to assess effects associated with aviation lighting include:

- locations associated with viewing dark skies;
- roadside viewpoints (particularly those marked as viewpoints on Ordnance Survey maps) and roadside car parks, primarily in rural areas.

Q6.5 - Has the consultee identified any further landscape or visual receptors that could be considered within the assessment (i.e., where it is expected that likely significant effects may occur)?

Noise

Natural England recommends that the following thresholds will help to moderate adverse

effects on users of PROW in the vicinity of the wind farm. This, in turn, would help to moderate adverse effects on related landscape characteristics such as tranquillity.

The wind turbines should, ideally, be located at a sufficient distance from public rights of way (PROW) such that users of the PROW would not experience noise levels above the baseline ambient level at any point (especially with regards to the public rights of way within the Northumberland National Park and at visitor attractions such as 'Winter's Gibbet' and the nearby roadside viewpoint that is marked on Ordnance Survey maps). As an absolute minimum, the noise levels experienced along PROW should not exceed 50dB at any point.

It is also good practice to ensure that turbines are located a distance of at least turbine tip height plus 10% from any PROW.²

Aviation Lighting

Consideration should be given to using turbines that are smaller than 150m to tip-height in order to avoid the need for aviation lighting.

Q6.6 – Are there any other relevant consultees who should be consulted with respect to the LVIA?

Other relevant consultees are:

- Other local authorities that overlap with the zones of theoretical visibility (including in Scotland, where appropriate / relevant).
- North Pennines National Landscape team.
- Northumberland Coast National Landscape team.
- Pennine National Trails Partnership.
- Hadrian's Wall National Trail Partnership.
- Historic England
- National Trust.
- Forestry England.
- Northumbrian Water
- Kielder Water & Forest Park Development Trust.
- Northumberland Wildlife Trust.
- Observatories within the zones of theoretical visibility.

² For example, the 'Assessment of Areas of Suitability for Wind Development in Calderdale' ([link](#) – page 10).

Chapter 8: Ornithology

Q8.1 - Are consultees content with the proposed methods for assessment? Have all ornithological receptors and potential impacts that could result from the Proposed Development been identified?

While the scoping appears to capture all the ornithological receptors, the potential impact on the use of the Site as a temporary roost site during the winter passage for golden plover (an interest feature of the North Pennine SPA) needs to be fully explored.

The methods of survey for the cable corridor depend on whether it will be laid under or over-ground and the route, which is not yet decided. Therefore, an adaptive survey approach will be required as the project develops. Natural England offers this general advice:

- Reconnaissance surveys should cover all seasons.
- 72 hours of vantage point surveys should be undertaken for areas of concern based on habitat/bird usage, particularly if overhead lines are considered for any sections
- The surveys should comprise 72 hours per vantage point location divided between seasons (36 hours breeding and 36 hours non-breeding) per year.
- Vantage point surveys should include surveys at times of peak migration for all relevant species.
- Two years of survey effort should be undertaken for areas of concern.

Maximum ranges for hen harrier (10 km), peregrine (recorded to 18 km) and golden plover (11 km) mean that a 5 km study area for impacted European sites/relevant bird populations for the cable corridor is too narrowly drawn and should be extended to at least 15 – 18 kms.

Increasing the study area as advised will mean that more of the potential cable corridor route will be scoped in for impacts on functionally linked land connected with the North Pennine SPA and that other designated sites with ornithological features should be scoped in (for example, Harbottle Moors SSSI to the north may now be in scope as it has ornithological features). Natural England does not have the digital Site boundary to be able to check which SSSIs should be included. Therefore, other relevant SSSI citations should be checked and incorporated into the desk study and survey parameters, where appropriate as the list provided in Table 2 in Annex A may not be completed.

The Northumberland Shore SSSI should be scoped into the assessment as Natural England is aware that wintering golden plover travel inland towards the moorlands and therefore could be using the site.

Nocturnal surveys should be undertaken given the species assemblages/species identified to date. These surveys should include roosting/night-feeding raptors, owls, waders and other relevant species. The surveys should span all times of the year and cover a two year period.

Impacts to ornithological receptors from disturbance are scoped in for all phases however, no details of the methods of how this will be assessed have been set out in Section 8.5 or within Chapter 13 (Noise and Vibration). Natural England notes that the perception of noise and vibration by ornithological receptors is not equivalent to human receptors and requires bespoke methods. Natural England's view is that an increase in noise levels of 3dB from the baseline ambient noise in an environment used by a feature would be considered a likely significant effect and require further consideration. Natural England advises that the assessment of impacts from noise on ornithological receptors is either included in Chapter 8 or scoped in for Chapter 13.

Q8.2 - Are consultees content with the extent of datasets obtained as part of the desk study?

Natural England advise that the applicant consults with Northumberland Wildlife Trust for records of breeding wader or raptor for their reserve at Benshaw Moor which is immediately north of the site.

The Forestry Commission may also have breeding wader data available for woodland creation proposals in the general area. Additionally, the Forestry Commission have funded the British Trust for Ornithology (BTO) to develop a Wader Zonal Map ([Forestry Commission Map Browser](#)) that models where breeding waders are likely to be breeding which could be a useful source of information for the assessment.

Additional desk study sources for bird records/surveys/sensitive sites in the area that should be accessed (if not already) include, but are not limited to:

- Natural England Northumbria Area Team and National Nature Reserve (NNRs) teams,
- Conservation officers within the National Park,
- Biological Record Centres relevant to the area,
- Conservation officers or team members from local Wildlife Trusts,
- local raptor study groups and local bird ringing groups.

All these sources of information may assist in understanding regional and local ornithological features. Equally, any owners, occupiers or land managers/rangers that are involved with the local wildlife groups should be contacted to obtain bird data for their sites. The Northumberland Local Nature Recovery Strategy (LNRS) should also be considered.

Q8.3 - Are consultees content with the scope of the completed and proposed surveys, taking into consideration the Site location and Cable Corridor Options, survey results collated to date and relevant contextual data from other sources?

Access to third-party land for some of the surveys was limited to public rights of way. No bird survey data has been provided so Natural England comments can only be limited at this stage and are without prejudice to seeing the full reports.

With the information presented in the scoping report it is not possible to determine whether the surveys has accurately assessed the density of key breeding species and the usage of the surrounding lands during the winter months.

The Environmental Statement will need to be supported with the reports from completed surveys to determine if the baseline data, supplemented with information derived from the desk survey, is sufficiently robust to accurately characterize the use of the Site by key species.

Please share any confidential breeding raptor or other surveys with Natural England in unredacted form when submitting the ES.

The applicant should also consider scoping in feeding and roosting distribution surveys for geese and swans (following NatureScot guidance protocols³).

³ [Recommended bird survey methods to inform impact assessment of onshore windfarms | NatureScot](#)

Q8.4 - Are consultees in agreement with what has been scoped in / out of the assessment and described above? Does the consultee agree with the list of key species for consideration in the EIA, and are there other species that should also be considered?

Natural England cannot agree with the list of key species for consideration in the EIA as the list will require review after obtaining full desk study results which is incomplete in the Scoping Report and further data may also be received from the list of sources provided in our response to Q8.2 above.

The following species should be included/added as 'key/target bird species' for surveys listed in Table 8.3:

- Common kestrel *Falco tinnunculus* (given the frequency of flights seen in vantage point surveys),
- Barn owl *Tyto alba*,
- Merlin *F. columbarius*
- Hobby *F. subbuteo*
- Marsh harrier *Circus aeruginosus*
- Whinchat *Saxicola rubetra*
- Common crossbill *Loxia curvirostra*
- Breeding waders and birds identified in 8.3.4.1, not included in Table 8.3.

The applicant should also consider including any birds identified through surveys to date that are identified locally or regionally as of conservation concern within local biodiversity or other plans, for example honey buzzard *Pernis apivorus* as secondary raptor species.

Given the significant assemblage of breeding birds (skylark, meadow pip, gropper etc), additional/current surveys should identify where populations roost, feed, congregate around the site and along the corridor routes. Consideration should be given in reports to whether the breeding/non-breeding bird numbers and species identified are sufficient to amount to a SSSI assemblage determination, <https://data.jncc.gov.uk/data/16bd76ad-bb74-4724-9e06-5df02b459524/sssi-guidelines-c17-birds-2023-v1-2.pdf>

When the results of surveys for species are presented in the ES, these should be presented in a way that combines the years of survey effort to make a comparison and analysis of the results simple and clear. This is in addition to having the annual survey results available as supporting documents.

Natural England disagrees with scoping out the need for HRA regarding the North Pennine SPA for the Site given that considerable numbers were recorded by the vantage point surveys during passage and in winter on the Site. Further discussions will be required with Natural England's national ornithological specialists regarding the potential importance of the temporary roost within the Site for this species.

There is a potential impact pathway if the Proposed Development causes mortality through collision with the turbines or abandonment of the temporary roosting site. Both of these potential risks have the potential to impact on golden plover at the Site alone and need to be assessed in a HRA, along with the impacts of the proposed corridor connection closer to the SPA at its southern point.

Natural England welcomes the Applicant's commitment to consulting with Natural England with regards to any effects the cable corridor options have on the SPA and advice this consultation includes consideration of the Sites effects on the SPA.

Although some bird features of the North Pennine Moors SPA and its underpinning SSSI's overlap, they are not the same. Therefore, both the SPA and the SSSI should be scoped in for both the Site and the cable corridor options to ensure that impacts on the features are assessed. This applies to Whitfield Moor Plenneller and Asholme Commons SSSI, Allendale Moors SSSI, Muggleswick, Stanhope and Edmundbyers Commons and Blanchland Moors SSSI. Natural England recommends that in order to ensure a robust Environmental Statement, these SSSI's are scoped in.

Chapter 9: Ecology and Nature Conservation

Q9.1 – Are consultees content with the proposed methods for assessment? Have all ecological receptors and potential impacts that could result from the Proposed Development been identified?

Natural England has no concerns with the methods of assessment proposed.

The potential risks of pollution (chemical spill or sediment release) on downstream freshwater pearl mussels should also be considered as the population is the second largest in England.

The Scoping Report notes that indirect impacts on peatland habitats is scoped in which is welcomed. Natural England notes that potential hydrological impacts of the proposals on peatland habitats in the Ottercops and Tocrag Mosses area should be considered in the ES.

Natural England is currently working with the landowner on a new Countryside Stewardship Higher Level (CSHT) scheme for this area to restore and enhance the blanket bog habitats (considered as irreplaceable habitats). This will entail restoring the hydrology of the site. The potential for restoration could be limited and this should be considered in the ES.

Damage and disturbance from maintenance activities is included in the *Decommissioning* section of 9.4 *Potential impacts and likely significant effects*, Natural England recommends that this list is reviewed and elements are assessed as part of the operational phase but welcomes the inclusion of this effect in the EIA.

Q9.2 – Are consultees content with the extent of datasets obtained as part of the desk study?

The applicant could also consult with Botanical Society of Britain and Ireland (BSBI) for any records they might hold for the area.

Q9.3 – Are consultees content with the scope of proposed habitat and protected species surveys?

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England advise that the potential effects of increased lighting on protected species should be assessed, particularly where proposed works will introduce additional lighting into previously unlit areas. The assessment should include construction, decommissioning and operational lighting, including turbine aviation lighting.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures.

Natural England advise that an NVC survey is undertaken of all the peatlands potentially affected (directly or indirectly), not just areas considered as blanket bog.

Q9.4 – Are consultees in agreement with what has been scoped in / out of the assessment and described above?

Natural England disagree with scoping out all impacts on freshwater pearl mussel due to the proposed design commitments. The proposals will drain into the catchment of the River Rede and therefore freshwater pearl mussels should be scoped in due to the potential risks from pollution (sediment release and/or chemical spillages).

The following SSSI's have been scoped out, Wharmley Riverside SSSI, Gunnerton Nick SSSI, Tyne Watersmeet SSSI, Stonecroft Mine SSSI, Simonside Hills SSSI, Mill and Whiskershiel SSSI and Billsmoor Park and Grasslees Wood SSSI. The rationale in Table 9.4 acknowledges that not all routing options and types of vehicles for the construction of the development is known. Natural England recommends that in order to ensure a robust Environmental Statement, these SSSI's are scoped in and only removed from further assessment when the developer is certain there will be no impact.

Q9.5 – Are the consultees content with the approach being undertaken with regard to BNG? Any advice on how the Proposed Development can future proof itself for future changes in statutory requirements would be welcome.

Irreplaceable habitat

Irreplaceable habitats are acknowledged in 5.4.14 of the National Policy Statement for Energy (EN-1) as *'habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity'*. Defra guidance on irreplaceable habitats (IH) and BNG should be referred to.

The irreplaceable habitats list recognises and protects England's most valuable habitats. For BNG purposes, the 10% net gain requirement is not applied to irreplaceable habitats, as they are so valuable they cannot be easily recreated, and it would therefore not be possible to achieve the requirement of increased biodiversity on top of no net loss.

Natural England advises that irreplaceable habitats should be avoided, with any impacts permitted only in exceptional circumstances. Avoidance of adverse impact of these key habitats is key. Where there are impacts to irreplaceable habitats, enhancement of irreplaceable habitats cannot form part of the BNG calculation. Only where there are no impacts to irreplaceable habitats can enhancement of irreplaceable habitats contribute to a development's BNG requirements.

Irreplaceable habitats must still be recorded in the biodiversity metric, but any impacts to these habitats will be flagged as unacceptable and requiring bespoke compensation to be agreed with the examining authority. With regards to impacts to blanket bog, which is irreplaceable habitats, bespoke compensation would be required.

Chapter 10: Geology and Peat

Q10.1 - Do you agree that the data sources identified are sufficient to inform the Geology and Peat baseline for the EIA (and therefore that no further baseline data collection is merited)?

Natural England advise that the applicant contact the Northumberland Peat Partnership (Alex Robinson: Robinson@northwt.org.uk) to see if there is any data for the site available.

Q10.2 - Have all Geology and Peat receptors and potential impacts that could result from the Proposed Development been identified?

The impacts of the proposed excavation/ removal/ damage of peat and the implications that this has for hydrological integrity of the peatland habitats has not been considered in this section.

For the eastern section of the proposal, impacting on the Ottercops and Todcrag Mosses, damage to the peat soils will have a negative effect on the complex mosaic of wetland habitats. The shallow peats is part of the overall peat body and therefore has an important functional role quite apart from its intrinsic value as a carbon store.

Q10.3 - Do you agree with the proposed approach to assessment for each of the impacts in Section 10.4 and scoped in or out of the ES Report in Section 10.7 for Geology and Peat?

All peat soils regardless of depth should be treated as highly sensitive and impacts to peat during construction and operation should be avoided to minimise habitat degradation and greenhouse gas emissions.

The cumulative impacts of the proposal and other similar proposal on peatland habitats and greenhouse gas emissions should not be scoped out of the ES report to ensure that the impacts on overall peatland habitat resource is not significantly effected and that the implications of construction on peat soils for carbon emissions are fully captured.

Q10.4 - Do you agree that the embedded mitigation measures described provide a suitable means for managing and mitigating the relevant potential effects of the Proposed Development on Geology and Peat receptors?

The mitigation indicates that peat soils will be avoided where practical rather than designing the proposal in such a way as to avoid damage to peat soils.

The construction of the turbine bases and access tracks will result in both a loss/damage to peat soils and will also impact on the hydrology of the peat body as a whole, degrading the habitats not directly impacted by the construction.

The mitigation measures do not mention the need to compensate for the impacts of the proposal on peat soils or the interlinked impact on hydrology and ecology, although the latter two issues may be addressed elsewhere, and therefore, it is not sufficient to address the negative impacts of the proposal on soils and geology.

If peat soils are damaged as a result of the proposal, then suitable compensation measures (e.g. improvements to the hydrological integrity of the Ottercops and Todcrag Mosses through grip blocking to a standard approved by Natural England) would need to be delivered across a suitably large area and in close proximity to the Proposed Development infrastructure.

Additionally, the potential impacts of the proposal on the restoration plans for the above mosses would also need to be considered. Natural England's current plans for habitat restoration across this site have had to be altered due to an apparent blanket ban on any works within 100 m (and in some cases 150 m) of the proposed windfarm infrastructure. This is something that we have not come across before and has major implications for government funded plans to restore peatland habitats in line with targets set out in the Environment Act 2021.

A significant part of any peatland restoration project involves getting the hydrology right which involves blocking historic grips. It will not be possible to successfully restore peat habitats in this area of the Site if drain blocking is not permitted near to the windfarm infrastructure. This will have a significant impact on restoration plans that Natural England have been drawing up with the landowner and will perpetuate the continued oxidation of the peat. Natural England has not come across this type of moratorium on restoration works within such a large distance from windfarm infrastructure before so it would be important to understand why it is being proposed in this particular case.

Q10.5 - Do you have any information that will be useful in the preparation of the Geology and Peat assessment, such as information on local quarrying or infilled land?

Natural England does not have any specific information that would be useful for the Geology and Peat Assessment.

Annex C Natural England's detailed comments on the Scoping Report

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
3. Environmental Impact Assessment Process	3.5 <i>Structure and content of the ES</i>	We note that the technical chapters of the ES will be supported by a suite of standalone documents including a Habitat Management Plan. Natural England welcomes the inclusion of this plan and sees it as a positive step towards ensuring that mitigation and compensation for impacts identified on the sensitive habitats present are considered at an early stage.
4. Policy and Legislative Context	4.3 <i>UK Legislation</i>	The Proposed Development is directly adjacent to and in the setting of the Northumberland National Park. As such the Applicant should consider the National Parks and Access to the Countryside Act (NPACA) 1949. In particular, they should consider Section 11A (1A) of the NPACA, which states: <i>'In exercising or performing any functions in relation to, or so as to affect, land in any National Park in England, a relevant authority other than a devolved Welsh authority must seek to further the purposes specified in section 5(1) and if it appears that there is a conflict between those purposes, must attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park'</i> This is commonly referred to as the 'seek to further' duty. It was introduced through Section 245 of the Levelling-up and Regeneration Act 2003 and came into effect on 26 December 2023. It replaces the previous duty to have regard to the purposes specified in Section 5(1) of the NPACA. The relevant purposes specified in Section 5(1) of the NPACA are the purposes of: (a) conserving and enhancing the natural beauty, wildlife and cultural heritage of those areas specified in the next following subsection [i.e. National Parks]; and (b) promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public. The Proposed Development is also within the setting of the North Pennines National Landscape and, to a much lesser degree, the setting of the Northumberland Coast National Landscape (i.e. both these National Landscapes are within the zone of theoretical visibility of the proposed development). As such,

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
		the applicant should also consider the Countryside and Rights of Way (CROW) Act 2000. In particular, they should consider Section 85 of the CROW Act, which states: <i>'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'</i> The examining authority (i.e. the Planning Inspectorate) and the Secretary of State are relevant authorities in this regard. As such, they will have to be satisfied that they have fulfilled the 'seek to further' duty when they make their recommendations and decision, respectively. With this in mind, it would be good practice for the applicant to ensure that the scheme complies with the 'seek to further' duty. The applicant should also consider published guidance relating to the 'seek to further' duty, including: • Defra (2014) <i>Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes</i> (link). • National Landscapes Association (2025) <i>Applying the CROW Act section 85 duty to 'seek to further the purpose' in National Landscapes – Guidance for relevant authorities</i> (link). The latter guidance document is written in relation to National Landscapes. However, many of the principles that are set out in the document are also relevant to National Parks.
4. Policy and Legislative Context	4.4.1.4 <i>National Planning Policy Framework</i>	The Scoping Report refers to some relevant paragraphs of the National Planning Policy Framework (NPPF). However, it does not refer to paragraph 189 of the NPPF, which states: <i>'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks</i>

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
		<i>and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas'</i> The Proposed Development is directly adjacent and within the setting of the Northumberland National Park and the setting of the North Pennine National Landscape. This paragraph of the NPPF is therefore relevant for this project. Case law⁴ has established that the 'great weight' that is referred to in paragraph 189 of the NPPF is applicable not just to development within a National Park or National Landscape but also to development in its setting.⁵ For example, paragraph 22 of this case law states that: <i>'In my opinion, the Inspector would have been unrealistic in adopting so narrow a view as to ignore for the purposed of paragraph 115 [i.e. what is now paragraph 189] views out of the AONB and the effect of development upon them'</i> This case law is reflected in relevant appeal decisions. For example, an appeal decision for the development of 50 homes in Gotherington, Gloucestershire, in the setting of the Cotswolds National Landscape (CNL), applied this great weight to the harm that the development would cause to the CNL (specifically, the harm caused to views from the CNL).⁶ Case law has also stated that:

⁴ Stroud District Council v Secretary of State & Gladman Homes [2015] EWHC (Admin) ([link](#)) (see paragraphs 20-26, particularly paragraph 22).

⁵ The case law does not apply 'great weight' to the impact to views of a National Landscape from outside the National Landscape. However, such views would still be an important material consideration, particularly where referenced in the National Landscape Management Plan, the relevant Landscape Character Assessments and / or other related guidance.

⁶ Appeal Decision Ref: APP/G1630/W/20/3256319 ([link](#))

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
		<i>'To speak of a breach of the policy [i.e. what is now paragraph 189 of the NPPF] when the development would harm the AONB, or a conflict with the policy in those circumstances, seems entirely realistic'</i>⁷ <i>'The policy [i.e. what is now paragraph 189 of the NPPF] is not actually expressed in terms of an expectation that the decision will be in favour of the protection of the 'landscape and scenic beauty' of an AONB, or against harm to that interest. But that, in effect, is the real sense of it'</i>⁸ These principles apply in relation to both National Parks and National Landscapes. Based on this information, Natural England considers that the 'great weight' in paragraph 189 of the NPPF (and in relevant National Planning Policy Statements) is applicable in relation to the proposed development.
4. Policy and Legislative Context	4.4.2 <i>Draft National Planning Policy Framework</i>	Natural England note that, in the draft NPPF, this great weight should be given to conserving and enhancing natural beauty, not just landscape and scenic beauty.
6. Landscape and Visual	6.3.1.2 <i>Designated and protected landscapes</i>	The windfarm is surrounded by national park on both the North, as well as the West and South-West. It would be good for the Environmental Statement to provide the distances to the nearest points of the national park to illustrate there is a good understanding of the sensitivity of this area.

⁷ Monkhill Ltd v Secretary of State for Housing, Communities and Local Government & Anor (Rev 1) [2021] EWCA Civ 74 ([link](#)), paragraph 29.

⁸ Monkhill Ltd v Secretary of State for Housing, Communities and Local Government & Anor (Rev 1) [2021] EWCA Civ 74 ([link](#)), paragraph 30.

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
6. Landscape and Visual	6.7.2 <i>Study area</i>	From the figures that have been provided with the Scoping Report, it appears that all of the cable route options would pass through the south-eastern corner of Northumberland National Park. As stated in paragraph 5.10.32 of the Overarching National Policy Statement for Energy (EN-1), '<i>the Secretary of State may grant development consent in these areas in exceptional circumstances</i>' and where the development is '<i>demonstrated to be in the public interest</i>'. It adds that '<i>consideration of such applications should include an assessment of ... the cost of, and scope for, developing all or part of the development elsewhere outside the designated area</i>'. Case law has stated, in relation to the exceptional circumstances 'tests', that '<i>no permission should be given for major development save to the extent that the development ... met a need that could not be addressed elsewhere</i>'.^[1] As such, the applicant should assess the scope for locating the cable route options outside of Northumberland National Park. If the current route options are maintained, the applicant should be required to demonstrate why the cable route options could not be located outside the National Park. The section of the National Park that the proposed cable route options pass through also forms part of the Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site (WHS). The WHS is one of the most significant components of the cultural heritage of the National Park. As such, potential impacts on the WHS should be assessed in the context of the statutory duty to seek to further the cultural heritage of the National Park as well as in the context of the WHS as a heritage asset in its own right.
6. Landscape and Visual	Table 6.2 <i>Significance Matrix (Illustrative)</i>	Natural England appreciates Table 6.2 is illustrative. However, if a matrix is going to be used, we recommend that a larger number of levels of sensitivity and magnitude of effect should be used (e.g. very high and very low). The main focus should be on providing a robust narrative that clearly explains the conclusions that have been reached.

^[1] R (Advause) v Dorset Council v Hallam Land Management Ltd [2020] EWHC 807 ([link](#)). Paragraph 35.

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
6. Landscape and Visual	Table 6.3 <i>Scope of the landscape and visual assessment</i>	Table 6.3 of the Scoping Report presents landscape and visual matters that are likely to give rise to significant adverse effects and, therefore, which are proposed to be scoped into the detailed assessment. The table applies a 20km threshold in relation to effects of the Proposed Development on: • the key characteristics and defining features of landscape character units within the study area; • landscape and visual receptors; • cumulative landscape and visual effects. Natural England recommends that this 20km threshold should not be applied where locations within the National Park or National Landscapes are within the zone of theoretical visibility. This is because the sensitivity of landscape and visual receptors in these locations is likely to be higher than in other locations. As such, even a small / low magnitude of change could potentially result in the overall significance being moderate or higher. Please also note our comments relating to cumulative effects, above.
8. Ornithology	8.3.1 <i>Study area & Figures 8.1a and 8.1b</i>	Figure 8.1a shows a 20 km buffer around the Site. Figure 8.1b shows a 2 km "Combined Wind Farm and Grid Connection Study Area". However, Section 8.3.1 of the Scoping Reports states that the wider study area is cited as 30 km from the Site and 5 km from the Cable Corridor Options. For clarity the ES should clearly present the full study area under consideration. Please note Natural England comments regards the width of ornithological survey area for the cable corridor being too narrow.

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
8. Ornithology	8.3.3.11 <i>Golden eagle</i> (<i>Aquila chrysaetos</i>)	Golden eagles are likely to be released in north England as early as 2027. Northumbria is a key potential release site. Therefore, all of England's population of this bird could potentially be within the region of Ray II or the population's range could overlap with Ray II. Survey protocols, mitigation options and collision risk modelling options should be considered early, and how these will be integrated into the environmental assessment, surveys and ongoing monitoring. Further guidance is available on the NatureScot website. Equally, it may assist for the applicant to contact NatureScot to obtain information about collision risk and further advice about survey, mitigation and collision risk modelling protocols. As noted above in Paragraph 3.5 of the main letter, Natural England also recommend the applicant contacts Restoring Upland Nature for further information.
8. Ornithology	8.3.4.1 <i>Breeding birds</i>	This section states that breeding golden plover (<i>Pluvialis apricaria</i>) have been recorded during the Ray Wind Farm EIA and pre-construction surveys. Natural England notes that breeding at this altitude is unusual for this species and therefore query whether these birds were on passage at the start of the breeding season or whether these wintering records. This should be clarified in the ES.
8. Ornithology	8.3.4.3 <i>Bird Carcass Records</i>	All carcass surveys for birds should be included in any collision risk assessment. Data for other windfarms in the local area about collision casualties should be obtained and included in any collision risk modelling.
8. Ornithology	8.3.5.2 <i>Survey Methods</i>	For the breeding Nightjar surveys, the survey effort should extend 1km from the site (and cable corridors). Foraging ranges extend a mean of c 750m from territory. Good habitat for Nightjar is present, as is a population, so a precautionary 1km is more appropriate https://onlinelibrary.wiley.com/doi/full/10.1111/ibi.12251

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
8. Ornithology	8.3.5.3 <i>Survey Limitations</i> & Figure 8.2 <i>Ornithological Survey Areas 2023-2025</i>	Land access constraints have meant that much of the wider survey areas were only covered via public rights of way. The ES will need to present all limitations to surveys and set out how they have not limited the establishment of a robust baseline.
8. Ornithology	8.3.5.3 <i>Survey Limitations</i>	There is no specific survey method specified for breeding songbirds, although this is assumed to be within the 'breeding waders' survey effort. Natural England notes that the songbird surveys are important, as meadow pipit and other passerines are clearly using the site and must be considered when assessing impacts (particularly displacement, habitat loss and disturbance) and potential mitigation.
8. Ornithology	8.3.5.4 <i>Flight activity survey</i>	Golden plover, curlew and raptors were frequently recorded during these surveys indicating that there is high usage of the Site with the potential for mortality / displacement resulting from the Proposed Development. The ES will need to fully assess the risks to these species from collision and potential avoidance of the site once the wind farm is operational.
8. Ornithology	8.3.5.5 <i>Breeding bird surveys</i>	Natural England notes that the number of breeding curlew associated with the site and survey area is likely to be of regional importance. Curlew have suffered significant drop in population over the last 20-30 years. The Proposed Development has the potential to cause mortality through collision and abandonment of breeding sites. The proposals may also reduce the suitability of the available wetland habitats used for foraging curlew. The ES will need to fully assess the effects on curlew from the Proposed Development and outline what mitigation is proposed if impacts are identified.

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
8. Ornithology	Table 8.4 <i>Outline criteria for IOF sensitivity evaluation</i>	A 1% threshold is not a rule for a site to define whether it is of national important numbers of birds and is not recognised as such. We advise that consideration of whether an impact is likely to be significant to a receptor should be a more nuanced and supported by contextual determination. There are wider judgements/considerations about the quality of a site and its importance. The range of species affected, and the diversity of the assemblage can in itself indicate a high-quality site. Nationally important sites for birds can be selected where they support an especially good range of bird species characteristic of a particular habitat, as defined by an index value.
8. Ornithology	8.4 <i>Potential impacts and likely significant effects</i>	Loss of habitat due to the turbine placement and associated infrastructure and the implications of this are not included in the potential impacts listed. Destruction of peat habitats is likely to lead to a direct loss of foraging habitat on birds. Habitat loss / degradation may also impact on the quality of surrounding habitats potentially impacting the breeding wader productivity at the Site and the surrounding area. The assessment of displacement during operation of the windfarm should consider the sensitivity of bird species to turbines and the likelihood (or not) of those species abandoning habitat at the site and along the corridor route.
8. Ornithology	8.5.7 <i>Habitats Regulation Assessment</i>	Please confirm that, in the first sentence of the second paragraph on page 160, the authors have omitted a 'not' from the following statement: <i>"Therefore, based on NatureScot guidance on SPA connectivity, these designated sites or the bird populations they support are considered to be at risk of likely significant adverse effects...."</i> The potential for likely significant effect should be scoped in for qualifying populations of the North Pennine's SPA in relation to the cable corridor.

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
8. Ornithology	8.5.7 <i>Habitats Regulation Assessment</i> & 8.7.2 <i>Matters Scoped Out</i>	There are potential impact pathways to the North Pennine Moors SPA in relation to the Cable Corridor (whether under- or over-grounded). A HRA should be undertaken to cover all the qualifying feature species of the SPA and consideration should be given to likely significant effects. As noted above, the 5 km radius for the cable corridor is not considered wide enough to establish the baseline for the assessment, and therefore other designated sites with ornithological features may need to be considered.
8. Ornithology	8.6 <i>Mitigation</i>	Without prejudice to future observations about any mitigation measures, consideration should be given to blade-painting, overhead line markers, turbine shutdown-on-demand technology, turbine height, turbine location, array orientation. The scoping document indicates that nesting scarce raptors and breeding waders and roosting hotspots of golden plover have been considered in the design of the turbine layout. Natural England advise that the ES presents how the survey data has influenced the turbine layout to show how impacts have been avoided.
8. Ornithology	Table 8.7 <i>Environmental factors to be scoped in or out of the assessment</i>	Natural England disagrees that the Northumbria Coast SPA can be scoped out of the EIA. Natural England also disagrees that the North Pennine Moors SPA can be scoped out of the EIA in relation to the site. The land on the site may be considered functionally linked to the SPA if golden plover recorded using the Site as a temporary roosting area are the SPA breeding population.

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
9. Ecology and Nature Conservation	9.3.2.2 <i>Field Surveys</i>	New Scroggs SSSI is within a Cable Corridor route option. This site is designated for lowland calcareous grassland (CG2) and a population of the red data book plant Lady's-mantle <i>Alchemilla micans</i>. Given the size of the SSSI compared to the potential corridor route options, damage to this site should be avoided and cable corridors should be moved away from the site. Natural England would like to be involved in any further conversations regarding cabling near or within the SSSI boundary.
9. Ecology and Nature Conservation	9.5.2 <i>Design commitments and assumptions</i>	Natural England welcomes the commitments and assumptions made here to reduce any likely significant effects. Especially the need to set back any infrastructure from watercourse at least 15m, flood risk zones should also be protected, ensuring no construction compounds are within these buffers. Natural England support the developers ambition to avoid tree loss, including placing appropriate buffers for Ancient and veteran trees. Natural England agree that the location of wind turbines and cable corridors should avoid Blanket bog and deep peat where possible. We note that the commitment to 'avoid all designated sites including buffer zones' has not applied to New Scroggs SSSI.
9. Ecology and Nature Conservation	Table 9.4 <i>Environmental factors to be scoped in or out of the assessment</i>	The section on peatland habitats indicates blanket bog may not be present. Natural England can confirm that blanket bog is present on the Site as staff have noted its presence and are developing a CSHT scheme with the land manager to restore and maintain the blanket bog. Additionally, the UK Hab survey provided (Figure 9.3 UK Habitat Classification Survey Results) has identified blanket bog and degraded blanket bog in the east of the site, as noted in section 9.3.3.2 of the scoping report.
10. Geology, Peat and Soils	10.2.1 <i>Legislation</i>	The 'Removal of Surface Soil Act 1953' – Restricts removal of topsoil without permission is also relevant during construction phases.

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
10. Geology, Peat and Soils	Table 10.1 <i>National planning policy statements</i>	EN-1 paragraph 5.11.12 states “<i>Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)</i>”. EN-3 paragraph 2.10.137 states “<i>The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources</i>” EN-5 paragraph 2.9.26 bullets 3 and 5 sets out what should be considered with respect to soils and best most versatile land if it is proposed that they are to be undergrounded.
10. Geology, Peat and Soils	10.2.3 <i>Local planning policy</i>	The adopted Northumberland Local Plan reinforces the requirements of the NPPF Policy 187; therefore, Policy POL3 should also be considered within this section.
10. Geology, Peat and Soils	10.2.4 <i>Guidance</i>	Defra’s Code for the Sustainable Use of Soil on Construction Sites, which requires soil resource surveys to identify what soils are on site (including peats, low nutrient soils etc) prior to development taking place so that the design of the development and soil management plans (which feed in CEMPs) can take appropriate account of them. Para 4.2.3 PPG Renewable and low carbon energy contains advice in relation to greenfield land which should be referred to in the PEIR and ES, namely i) ‘<i>whether the proposed use of agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land</i>’; and ii) the proposal allows for continued agricultural use where applicable and or encourages biodiversity improvements around arrays. The PPG also draws attention to two ministerial statements which provide planning authorities with further advice about protecting the best agricultural land. The British Society of Soil Science has published the Guidance Note Benefitting from Soil Management in Development and Construction which also contains useful guidance.

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
10. Geology, Peat and Soils	10.3.6 <i>English Peat Map</i> & Table 10.2 <i>Summary of peat depths</i>	The 40cm quoted as the definition is from the older Peaty Soils Location (PLS) data set and not the definition that is currently used by Natural England of greater than 30cm. Note also our comments above in Section 11 regarding ensuring that the peatlands are considered in their entirety rather than just defined as deep peat/shallow peat. The assessment will need to present impacts on peat ecosystems and the hydrological landscape that supports them, not just impacts on the peat soils.
10. Geology, Peat and Soils	10.3.8 <i>Unexploded ordnance (UXO)</i>	Natural England acknowledge the potential risks associated with unexploded ordnance (UXO). With appropriate mitigation measures in place, Natural England does not consider the potential for UXO to be a constraint to carrying out ALC surveys. Where there is an identified risk from UXO, the auger core and soil profile pit locations should be first cleared by a UXO specialist prior to the commencement of any intrusive works. Where there are indications that a location is unsuitable due to perceived UXO risk, auger and pit locations should be adjusted to a nearby suitable location'.
10. Geology, Peat and Soils	10.3.9.1 <i>Peat survey and investigations</i>	States "depths of 0.1m or less, which are considered non-peat under English guidance". No reference for this guidance has been provided. Natural England advise that peat of less than 0.1m is still likely to be hydrological connected to deeper peat and thus important to the hydrological integrity of the wetland (peatland) complex and thus, damage to this shallow peat has implications for the health of the wider peat body.
10. Geology, Peat and Soils	10.5 <i>Assessment methodology</i>	The purpose of the assessment is noted as being to "Develop an acceptable code for construction that will adopt best practice procedures, effective management, and control of on-site activities to reduce or offset any detrimental effects on the geology and peat". Which is supported by Natural England however, it is noted that it is likely that the Proposed Development may lead to peat loss / degradation and therefore the assessment may also need to present how this loss / degradation will be mitigated and, if required, compensated.

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
10. Geology, Peat and Soils	10.6 <i>Mitigation</i>	There is no discussion in this section of compensation that will be undertaken in the event of irreversible damage to peatland. Natural England considered that this effect appears highly likely with the Proposed Development and therefore compensation measures should be considered early as the design develops. Compensation measures could be in the form of improvement hydrological integrity of nearby mosses through blocking of existing historic grips, restoration of hags etc..
10. Geology, Peat and Soils	10.6.2 <i>Outline Peat Management Plan</i>	Natural England supports the proposal for an Outline Peat Management Plan (oPMP) to accompany the ES. It is noted that the oPMP will set out management techniques for handling, storing and depositing peat for reinstatement. Re-use of the peat as a fill material will lead to significant oxidation (resulting in carbon loss) over time unless it is re-wetted. Peat should only be used for infill in areas where the topography will support re-wetting to minimise future oxidation of the peat i.e. where it is used for peatland restoration purposes. Natural England advise that the oPMP should consider the climate implications of carbon loss due disturbance /damage to peatlands as a result of the Proposed Development.

Annex D: Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should be taken as Natural England's formal representation. This standard advice is applicable to all stages of the NSIP process and may be used by the applicant for NSIP pre application stages, by the Examining Authority (ExA) during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority.

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

This includes advice on information that is required to assess this and how to interpret the results of air quality modelling for the decision maker to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants from the construction, operation and decommissioning phases of a proposal:

- ammonia (NH₃)
- nitrogen oxides (NO, NO₂ or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available here: <https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover NSIPs, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling you need. You need to review this and make your own conclusion.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features. Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
	2 Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.	The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View , alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.

Stage	Step	Supplemental evidence/ basis for judgment
Detailed AQ modelling	3 Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.	Air Quality modelling should include relevant scenarios that are clearly identified. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, a construction year, and future operational year(s), do nothing (without proposal), do something (with proposal); taking into account background trends for each pollutant). For proposals that will emit pollutants from a point source, it is helpful to provide isopleths of the dispersion modelling results, showing the predicted contours of pollutant concentration and deposition of the development. These may be assessed against the locations of protected sites and sensitive features within those sites. At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf
Applying screening thresholds	4a Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5	Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u>. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.

Stage	Step	Supplemental evidence/ basis for judgment
	4b Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5 Applicants might use the Joint Nature Conservation Committee (JNCC) 'decision-making thresholds' as a reason for not completing an in-combination assessment. If so, you should check they have correctly followed the JNCC guidance on decision-making thresholds. If this guidance shows they do not need to complete an in-combination assessment, continue to step 5. If applicants have not used the decision-making thresholds, or have not followed them correctly, they will need to provide an in-combination assessment.	Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.
Detailed Assessment of ecological impacts	5 This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the decision maker to determine if there would be an adverse effect on a SSSI. If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the decision maker: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Habitats that have already been subject to high background nitrogen deposition can develop tolerance to further deposition. This cannot be used to justify further exceedance as it would undermine conservation objectives to reverse decline. You should consider predicted effects on the species richness of a habitat against the site's conservation objectives.

Stage	Step	Supplemental evidence/ basis for judgment
Appropriate Assessment (AA) for habitats sites	6 The competent authority to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed should also be assessed at this point. Should the AA conclude that the proposal would have an AEOI that cannot be excluded with mitigation measures, consider the derogation route of the HRA process. Should compensation measures be required under derogation, please contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the project (ie construction, operation and decommissioning where relevant). To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.

Mitigation measures

If you cannot conclude there is no adverse effect, the applicant will need to apply mitigation measures. Measures will only be appropriate if you can quantify their effectiveness in reducing emissions on the protected site. You should check that mitigation measures are in place to avoid adverse effects on site integrity over the lifetime of the project.

Mitigation may include measures that:

- the applicant volunteers
- you impose through formal conditions or restrictions in any permission or authorisation – these may be different or stricter measures than ones proposed by the applicant

Examples could include:

- relocation or redesign of developments to avoid impacts on protected sites
- control of other emissions of the same pollutants with an overlapping effect
- a change in stack height for industrial processes
- Euro 6 standards for construction machinery
- adding wooded shelterbelts, trees, green walls and hedges to limit dispersal of emissions, as long as these measures in themselves would not negatively impact the protected site

Table 2: Industrial air pollution screening distances

Emission source	Distance for SSSIs	Distance for habitats sites
Industrial developments	2km	5km
General combustion processes (under 20MW energy input)	500m	500m
General combustion processes (20MW to 50MW energy input)	2km	2km
General combustion processes (over 50MW energy input)	2km	10km
Mechanical and biological waste treatment	500m	500m
Landfill waste	2km	2km
Compost (under 500 tonnes maximum annual operational throughput)	500m	500m
Compost (500 to 75,000 tonnes maximum annual operational throughput)	1km	1km
Compost (over 75,000 tonnes maximum annual operational throughput)	2km	2km
Airports, helipads and other aviation proposals	5km	5km
Oil and gas exploration and extraction	500m	500m
Quarries	200m	200m
Other industrial developments causing air pollution	500m	500m

Additional advice

Common Standards Monitoring¹ is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. where the main source of background exceedance is due to agriculture, but the proposal is an industrial project). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

You must determine if there is evidence that the increased emissions represent a measurable risk and could compromise the strategic initiatives. You would need to consider information on:

- the extent to which any declining national trends in air pollution, or strategic initiatives to tackle emissions affecting the site more locally, might otherwise lead to improvements
- the rate at which such improvements are anticipated

- the extent of the impacts of a plan or project, and whether those impacts can properly be considered temporary and reversible

If the affected area is small, consider the risk to site integrity proportionally. For example, how important is the area in terms of rarity, location, distribution, vulnerability to change and ecological structure. If it is a supporting habitat, consider its importance to the designated species on the site. Consider any site survey information that may provide evidence of existing impacts.

Emissions from road transport (if applicable):

Emissions from road transport may be an operational impact or be limited to the construction phase of proposals. Roads on the affected road network that lie within 200m of a designated site should be considered. If all affected roads are further than 200m from a protected site, then there is no likely significant effect (habitats sites) or no impact (SSSIs) on protected sites from air pollution

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and nitrogen oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a “restore” objective, this should be noted as a “retardation” of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that NSIPs should be using (which we advise should also consider ammonia emissions as well as NO_x – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment. We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NO_x in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the proposals.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with your decision to authorise the project

From: BeforeYouDig <BeforeYouDig@northerngas.co.uk>
Sent: 07 May 2026 13:15
To: Ray II Wind Farm <RayIIWindFarm@planninginspectorate.gov.uk>
Cc: BeforeYouDig <BeforeYouDig@northerngas.co.uk>
Subject: RE: 1400024825 - EN0110031 - Ray II Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification

Good morning/afternoon,

Please find attached our response to the Scoping Opinion at the above location,

We do not object however please find the gas plan and safety info attached.

Kind regards,

Jennie Adams

Before You Dig

Northern Gas Networks

1st Floor, 1 Emperor Way

Doxford Park

Sunderland

SR3 3XR

Before You Dig: 0800 040 7766 (option 3)

www.northerngasnetworks.co.uk

facebook.com/northerngasnetworks

twitter.com/ngngas

Alternative contact:

beforeyoudig@northerngas.co.uk



Get involved! Have your say in the future of your gas network and win great prizes, by taking part in our BIG customer survey at together.northerngasnetworks.co.uk Keep posted to take part in a range of activities from workshops to roadshows. Together, we are the network.

Northern Gas Networks Limited (05167070) | Northern Gas Networks Operations Limited (03528783) | Northern Gas Networks Holdings Limited (05213525) | Northern Gas Networks Pensions Trustee Limited (05424249) | Northern Gas Networks Finance Plc (05575923). **Registered address:** 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU. Northern Gas Networks Pension Funding Limited Partnership (SL032251). **Registered address:** 1st Floor Citypoint, 65 Haymarket Terrace, Edinburgh, Scotland, EH12 5HD. **For information on how we use your details please read our [Personal Data Privacy Notice](#)**



Stay safe near our pipes

A guide to working near infrastructure

Who are Northern Gas Networks?

We look after the 37,000km of gas mains in the North of England. We don't own the gas but it's our job to transport it safely to you. We're responsible for most of Yorkshire, the North East and Northern Cumbria with our pipes running the equivalent distance of Leeds to Sydney, Australia and back.



Before you start work

1

Identify the **exact location** of our gas infrastructure (pipes etc) by **hand digging** trial holes or using **electronic tracers**.

Surface boxes and manholes

Never cover surface boxes or build manhole covers or other structures over, around or under a gas pipe.

Always ask our permission before doing work that may affect a cover or protection.

2

Use a **marker** to indicate the position of our pipes on site.

3

Make sure everyone involved has a copy of our **site plan** and everyone's read the **HSG47 Avoiding Danger from Underground Services** and **Utilities Guidelines on Positioning and Colour Coding of Apparatus**. You can download these for free from Streetworks.org.uk

Tree planting

- Make sure you carefully consider the impact of planting trees and shrubs as roots can cause damage to gas pipes and make future maintenance work difficult.
- You will need to get approval from the Before You Dig Team before you can start planting.

Clearances

Never lay equipment along or above a gas pipe.

Keep a minimum clearance of 250mm or 1.5 x the external diameter of the gas pipe (whichever is the greater) between the existing gas infrastructure and any new plant. If this isn't possible, please contact the Before You Dig Team.

250mm

Deep excavations

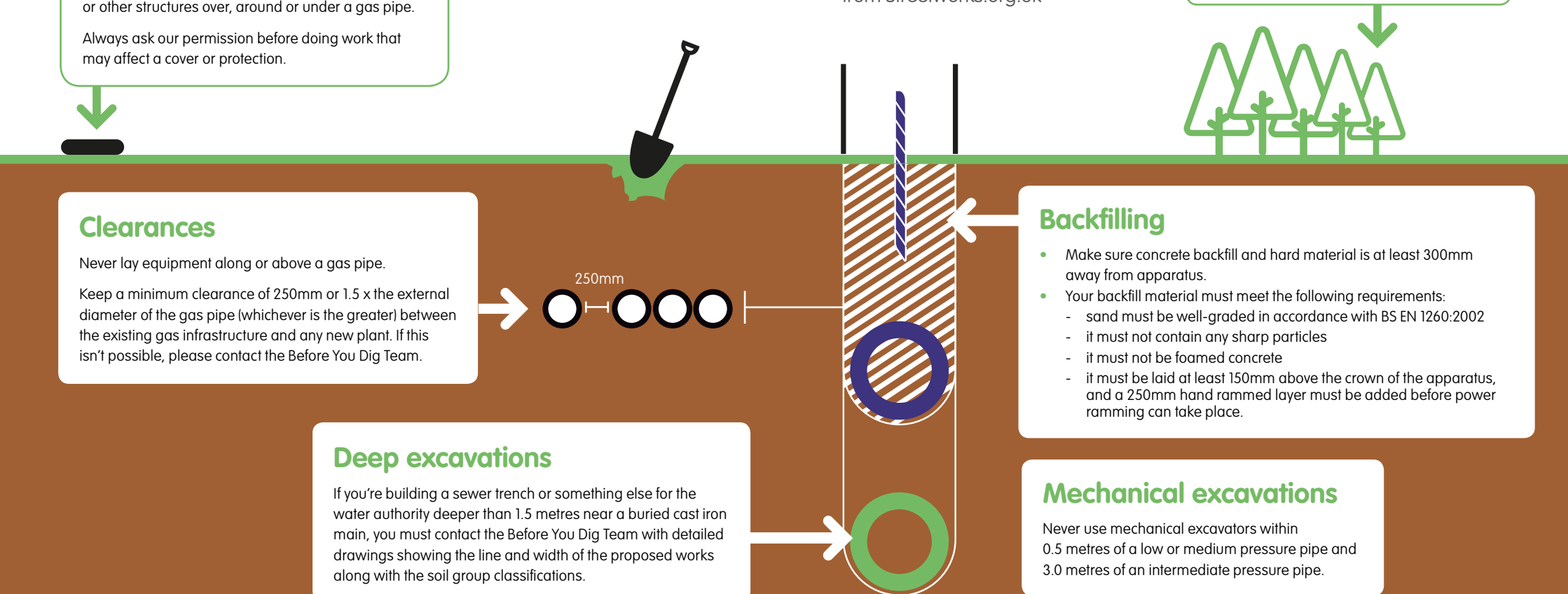
If you're building a sewer trench or something else for the water authority deeper than 1.5 metres near a buried cast iron main, you must contact the Before You Dig Team with detailed drawings showing the line and width of the proposed works along with the soil group classifications.

Backfilling

- Make sure concrete backfill and hard material is at least 300mm away from apparatus.
- Your backfill material must meet the following requirements:
 - sand must be well-graded in accordance with BS EN 1260:2002
 - it must not contain any sharp particles
 - it must not be foamed concrete
 - it must be laid at least 150mm above the crown of the apparatus, and a 250mm hand rammed layer must be added before power ramming can take place.

Mechanical excavations

Never use mechanical excavators within 0.5 metres of a low or medium pressure pipe and 3.0 metres of an intermediate pressure pipe.



Carrying out explosions, pilings, boring or deep excavations?

You need to call us for minimum safe working distances before you get started.

Financial penalties

- You will need to cover the costs of any damage to our infrastructure.
- We will charge you for any alterations needed to surface boxes or manholes caused by your work.
- If we have to move our infrastructure as a result of your work, you will need to cover the cost.

Exposed plant

- You must support our infrastructure at all times, and protect any exposed elements from impact.
- Never weld or use hot substances if there is a risk of damaging plastics or protective pipe coatings.

Make sure that you build shuttering to stop fresh concrete from encasing our infrastructure.

Access

We need access to our infrastructure at all times so make sure that access isn't blocked by temporary structures and piles of spoil.

Crossing our plant with heavy equipment

Always ask our permission before you place heavy goods, equipment and vehicles on our infrastructure.

Smell gas or suspect a gas leak?

1. Call **0800 111 999** immediately.
2. Move away from the gas pipe.
3. Don't attempt to block the leak.
4. Evacuate people from surrounding buildings.
5. Put out naked flames.

Questions?



Call: 0800 040 7766



Email: beforeyoudig@northerngas.co.uk

Who are Northern Gas Networks?

We look after the 37,000km of gas mains in your area. We don't own the gas but it's our job to transport it safely to you.

The 9999Planning Inspectorate
69 Buckingham Avenue
SLOUGH
SL1 4PN

07 May 2026

Want to talk?

If you have any questions our
Customer Care Team will be able to help:

0800 040 7766

 customercare@northerngas.co.uk

 northerngasnetworks.co.uk

Your Reference -
1400024825

Building in the area: finding gas mains

Dear Sir/Madam,

Thank you for telling us you plan to carry out work at Ray II Wind Farm, Near Kirkwhelpington, NE19.

We don't have any mains pipes in this area, but there may be pipes that are owned by **other gas transporters** or **private companies** where you're planning to work. You should **contact them separately** to find out if they have pipes on your property.

If you'd like this information in Braille, large print or another language, please call us.

 @NGNgas  facebook.com/northerngasnetworks

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Registered office: 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU

**we are
the network**

Staying safe near our pipes

You must make sure that everyone working on the site follows the safe digging practices outlined in HSE publication **HSG47 Avoiding Danger from Underground Services** before using mechanical plant. You can download these for free from: [hse.gov.uk](https://www.hse.gov.uk).

Kind regards

NGN Before You Dig Team

If you'd like this information in Braille, large print or another language, please call us.



@NGNgas

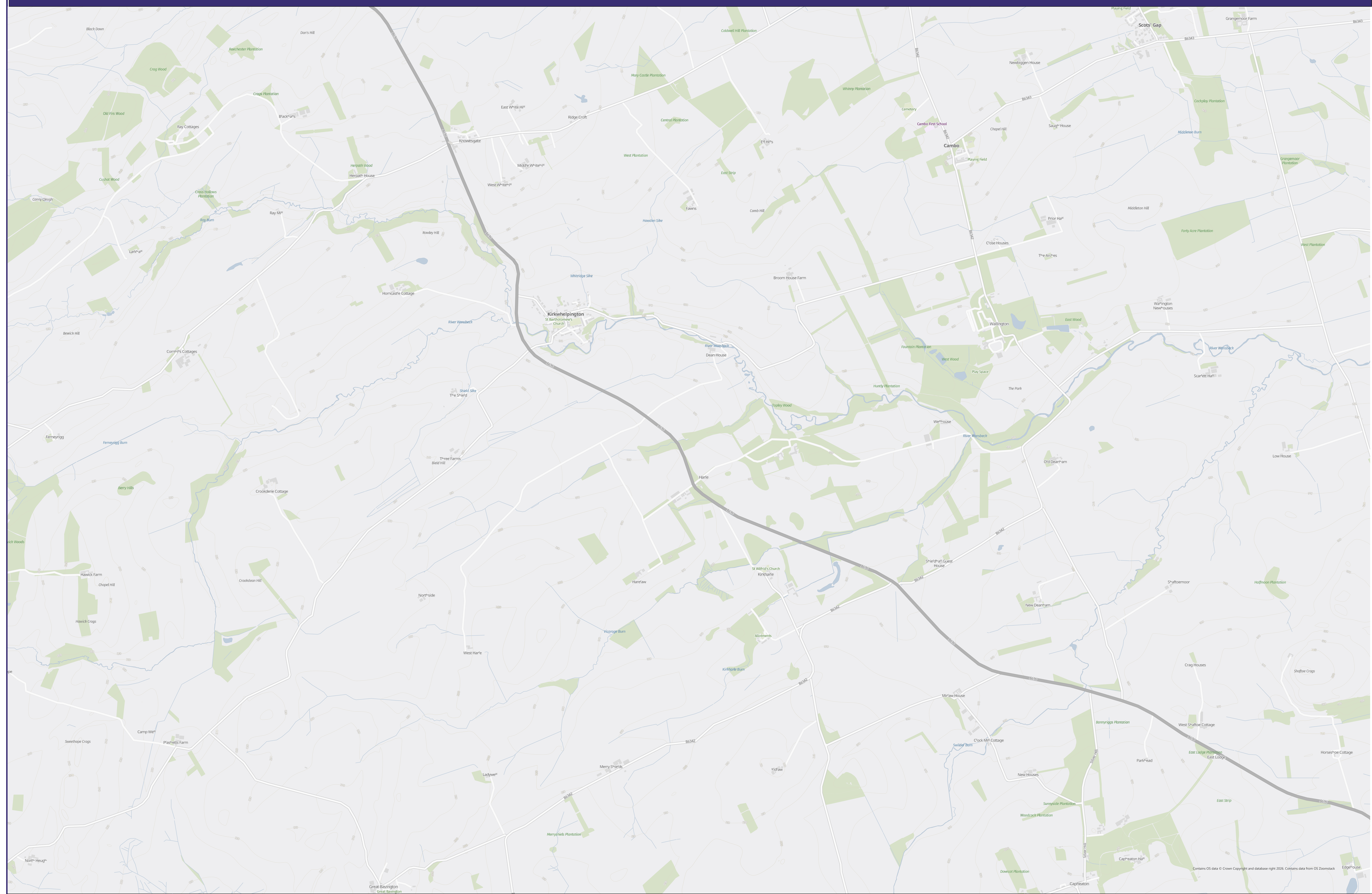


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Registered office: 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU



we are
the network



Legend
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Scale 1:10,000



Disclaimer

This plan shows those plans owned by Northern Gas Networks or the relevant Gas Distribution Network in their roles as Licensed Gas Transporters (GT). Gas plans owned by other GTs or information privately owned may be present in this area. Information with regard to such plans should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service plans, valves, registers, leak connections, etc. are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Northern Gas Networks, the relevant Gas Distribution Network or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HSG247, must be used to verify and establish the actual position of mains, pipes, services and other apparatus as close before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all parties (either direct labour or contracted) working for you or on your gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

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Footer

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Northern Gas Networks

Legend

1:10,000 Scale

2:50,000 Scale

3:100,000 Scale

4:250,000 Scale

5:500,000 Scale

6:1,000,000 Scale

7:2,000,000 Scale

8:5,000,000 Scale

9:10,000,000 Scale

10:20,000,000 Scale

11:50,000,000 Scale

12:100,000,000 Scale

13:200,000,000 Scale

14:500,000,000 Scale

15:1,000,000,000 Scale

16:2,000,000,000 Scale

17:5,000,000,000 Scale

18:10,000,000,000 Scale

19:20,000,000,000 Scale

20:50,000,000,000 Scale

21:100,000,000,000 Scale

22:200,000,000,000 Scale

23:500,000,000,000 Scale

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Northern Gas Networks



Karen Wilkinson
Senior Environmental Advisor
The Planning Inspectorate

Planning Ref: 26/01624/SCOPE
Your Ref: EN0110031
Contact: Mr Gordon Halliday
Direct Line: [REDACTED]
Email: [REDACTED]@northumberland.gov.uk
Date: 4 June 2026

Dear Ms. Wilkinson

**Planning Act 2008 (as amended) and the Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) –
Regulations 10 and 11**

**Application by Vattenfall (the applicant) for an Order granting Development
Consent for the Ray II Wind Farm (the proposed development)**

**Scoping consultation and notification of the applicant's contact details and
duty to make available information to the applicant if requested**

I refer to your invitation to submit comments on the above proposal. It should be noted that as this is a request for comments on a Scoping Report, this response makes no comments on the principle of the proposed development.

Northumberland County Council is the Local Planning Authority for the site of the proposed development. The County Council recognises that the proposed development is of a type and scale that means that it is a Nationally Significant Infrastructure Project (NISIP) and therefore requires a Development Consent Order (DCO) from the Secretary of State before it can be built.

The site is also in a sensitive location, close to the Northumberland National Park, and we have seen the Park Authority's consultation response dated 28 May 2026. In our response, reference will be made to the Park Authority's response where appropriate. It is anticipated that the two LPAs will work closely during the determination process for the proposed development.

The County Council agrees that it is a consultation body that must be consulted before the Planning Inspectorate adopts its Scoping Opinion. In this response the County Council (as LPA) sets out its comments on the applicant's Scoping Report and the information that it considers should be provided in the Environmental Statement (ES).

The proposed development would comprise up to 20 turbines with a tip height up to 230 metres, a Battery Energy Storage System (BESS), on-site substation, associated grid connection of approximately 20 km to connect to Fourstones Substation, and other associated infrastructure. The proposed development is anticipated to have a generating capacity of approximately 166 MW.

The site of the proposed development is located approximately 1.2 km northeast of West Woodburn, 3 km south of Elsdon and 3.2 km northwest of Kirkwhelpington. The site spans land to the east and west of the A696, comprising a mix of wetland, heathland, and commercial coniferous forestry. The eastern section of the site (to the east of the A696), consists predominantly of unenclosed moorland habitats, dominated by wetland and heathland, and enclosed fields managed for sheep and cattle rearing. The western section (to the west of the A696) is dominated by commercial coniferous plantation. The operational Ray Wind Farm (16 turbines) is located south of the site on the western side of the A696.

The proposed development includes the grid connection route. The Scoping Report refers to Cable Corridor Options as the grid connection route is currently being investigated. It is also noted that it is currently unknown whether the grid connection will be underground cables, overhead line or a combination. The ES will need to include sufficient information so that the environmental effects of this element of the proposed development can be assessed.

Chapter 4 Policy and Legislative Context

Section 4.6.1 deals with the Northumberland Local Plan (NLP) and Table 4.1 lists Various policies in the plan. The following additional policies are considered to be relevant to the proposal and should be added to the list.

Policy STP 5: Health and well being

Policy STP 6: Green infrastructure

Policy QOP 1: Design Principles

Policy QOP 2: Good design and amenity

Policy QOP 4: Landscaping and trees

Policy QOP 5: Sustainable design and construction

Policy TRA 1: Promoting sustainable transport options

Policy TRA 2: The effects of development on the transport network

Policy TRA 4: Parking provision in new development

Policy POL 1: Unstable and contaminated land

It should also be noted that the cabling route overlaps with the civil parish of Humshaugh. This area has a made neighbourhood development plan (Humshaugh Neighbourhood Plan, made 12 March 2025). This plan forms part of the Development Plan for the area and is therefore a material planning consideration.

Section 4.6.2 refers to the review of the NLP. It should be noted that on 16 April 2026, the County Council gave notice of its intention to start preparing a new Local Plan. Further information is available on the Council's website at <https://www.northumberland.gov.uk/planning-and-building/planning/planning-policy-and-local-plan/new-northumberland-local-plan>

Chapter 5 Design Iteration and Layout

The main consideration in identifying the location of the proposed development

would seem to be proximity to the existing Ray Wind Farm. The County Council would not necessarily agree that this is 'an area already characterised by wind energy infrastructure' (Section 5.2.1) and the cumulative impact of these developments will require careful assessment.

Regarding the statement that 'the Site offers the potential for connection to a viable substation' it should be noted that the Fourstones substation is 20 kms away and two solar farm applications that are proposed to connect with the substation are awaiting determination by the Council.

Chapter 6 Landscape and Visual

Q 6.1 – Are there any comments on the overall methodology proposed to assess effects on landscape and visual receptors, or to assess cumulative effects?

Technical Guidance Note LITGN-2024-01 published August 2024 by the Landscape Institute makes clear that the focus of visual assessment should be on the visual receptors (i.e. people who are affected by a change in view). The identification of receptors should be the starting point for selecting viewpoints to illustrate potential visual effects. The Scoping Report provides a general description of potential landscape and visual receptors and also some specific examples of local receptors, but there is no list of receptors which can be cross referenced with proposed viewpoints in Table 6.4 to allow consultees to make a reasonable evaluation as to whether the proposed viewpoints are reasonable or comprehensive.

The ES should clearly identify and summarise landscape and visual receptors across the study area either individually or in groups. Visual receptors should include National Cycle Routes (NCR 68 and 10), National Trails such as the Pennine Way, Hadrian's Wall Path and other long distance routes/promoted paths such as The Sandstone Way, Reiver's Way and St Oswalds Way. Other footpaths could be combined under several receptor groups according to the distance from the Site. A similar approach could be taken for highway routes and residential properties. The applicant should propose appropriate distance zones. The full list of receptors should include designated sites, tourist/visitor destinations, local settlement and the main upland areas/commons/named peaks.

The proposed distance for a residential visual amenity assessment of 1.5km – 2km is accepted as an appropriate study area. However, visual effects on residential properties should be assessed throughout the 20km study area. The normal approach is to group properties within settlement or distance zones to be agreed with the applicant.

Viewpoint analysis will help inform the visual assessment but it is important to focus on the overall (significant) effect on receptors. This will require further analysis in terms of, for instance, the length of Hadrian's Wall World Heritage Site Buffer Zone affected, the length of public path/bridleway and transport/tourist routes affected, local settlement affected, the number of designated sites affected, the area of National Park/open access land affected and the number of named peaks affected.

In order to understand and demonstrate how visual affects influence the visual character of landscape areas (landscape receptors) it may be helpful to set out the visual assessment prior to the landscape assessment in the ES. It is important that the applicant describes and assesses any significant changes to the setting of the

World Heritage Site and National Park which may affect its special qualities and value. The methodology used to assess the change in setting will need to be clearly set out in the ES.

Combined and sequential cumulative effects should be assessed in accordance with GLVIA3 guidance.

It is ES practice that worst-case effects are assessed for development however, this may not be practical for many of the viewpoints/receptors across the study area. In that case, photographs should be described as representative, illustrative or specific views as defined in GLVIA3. The photography should include technical details as recommended in Technical Guidance Note TGN 06/19 Visual Representation of Development Proposals - Visualisation Type 4.

Photography should be undertaken in clear conditions to allow distant features to be identified such as existing wind turbines. Winter photography should be presented where existing vegetation provides seasonal screening, noting that winter effects persist for approximately 5 months and that Northumberland attracts visitors all year around. Photography should be presented as a panoramic view to show the wider context and also as a single frame photograph to more accurately illustrate scale. Some viewpoints will require multiple photographs in different directions to capture the full extent of the proposed development and cumulative development.

The photography and photomontage views should illustrate the proposed BESS, sub-station and anemometry mast.

The methodology adopted for assessing significance should recognise that even visual effects of a low magnitude have the potential to generate significant effects where such views can draw the eye and alter the perception/value of a landscape which is otherwise devoid of built development.

Q 6.2 – Are there any comments on the proposed Study Areas?

It is agreed that significant landscape and visual effects are unlikely to occur beyond the detailed 20km study area however, this should be tested by assessing a small number of additional viewpoints beyond 20km, where there are currently no views of existing wind turbines. Suitable locations may include the footpath to the summit to Carter Pike near the Scottish Border and also paths across Kielderhead Moor on land which falls within the predicted ZTV. The justification is that even minor views of the proposed development have the potential to generate significant landscape and visual effects. See also the Council's response to Q 6.1 above. This further analysis will confirm whether such effects should be scoped out of the ES as recommended in Table 6.3 of the Scoping Report.

At this stage we cannot comment on the suitability of the study area around the proposed cable routes without further clarification on the preferred options, whether the cables will be undergrounded or overhead, and if overhead, the type and height of the pylons. Also, it would be helpful to understand how the route options relate to cable routes previously used for Ray I Wind Farm.

Q 6.3 – Are there any comments on the proposed list of assessment viewpoint locations?

The Scoping Report confirms that the proposed viewpoints draw on locations previously considered as part of the Ray I Wind Farm application as well as

consideration of preliminary ZTV mapping for the Proposed Development. It is the Council's view that a cumulative ZTV should also be used to inform the viewpoints locations and without this information it is difficult to provide a definitive comment on the selected views. We would, however, again refer to the need to focus photography on key landscape and visual receptors as set out in our response under Q6.1 above.

For this Development, one of the key roles of the viewpoint analysis is to enable the cumulative visual effects to be understood, not only in terms of massing effects but also the towering effect generated by turbines which are twice the height of existing structures and located on a ridgeline in an upland area. The towering effect of this Development is likely to be visible in more distant views to the north and south and this will need to be considered when refining the extent of the study area.

We note that out of 30 proposed viewpoints, only 8 are located to the north of the Development with the largest cluster to the south and south east, which presumably coincides with views selected for Ray I. While these (clustered) views will provide some understanding of likely cumulative effects generated by Ray 1 and Ray II in combination there should be a similar focus of views to the west of the proposed development (from key receptors) and also in viewpoints to the north, which would illustrate the visual effect of the proposed development, where seen in isolation.

Further to the above general observations and comment we would request additional views (focused on receptors) on land west of the proposed development to include locations from the A68 (e.g. parking layby at Corsenside), National Cycle Route 68 (e.g. parking layby/footpath to Low Cleughs Bastle; west of West Woodburn; and from the C186 between A696 and Elsdon), National Cycle Route 10 (between A68 and Bellingham). Additional views are also required from the B6320 and B6341 between the A68 and Elsdon. The above recommendations are simply indicative and the final list of viewpoints should be informed by the list of key receptors which have not yet been defined in the Scoping Report, other than in general terms.

Views from settlement should not be from central areas except where this represents a reasonable worst-case but from locations on the edge of settlement (to illustrate a change in setting) or views from designated sites/buildings or key attractions.

Views should be presented to illustrate the effects on elevated areas open access land to the north and west of the proposed development at locations where there is reasonable public footpath access.

Q 6.4 - Which viewpoints do you consider would be helpful to assess effects associated with aviation lighting.

The County Council supports the comments submitted by the Northumberland National Park Authority on the potential effects of the proposed aviation lighting in relation to the Northumberland International Dark Sky Park. The Scoping Report does not identify how such an assessment will be carried out and clarity is needed on the method to assess the existing baseline and the potential lighting effects.

Q 6.5 - Has the consultee identified any further landscape or visual receptors that could be considered within the assessment (i.e., where it is expected that likely significant effects may occur)?

See responses to questions Q 6.1 – Q 6.5 above.

The County Council considers that landscape and visual considerations, including their link to heritage considerations, are likely to be a particular focus of whether the proposed development is acceptable and therefore the applicant should take the above comments into account in preparing the ES.

Chapter 7 Cultural Heritage and Archaeology

The Council's County Archaeologist and Built Heritage & Design team have each made comments on this chapter. For completeness these comments are reproduced below.

County Archaeologist Comments

Q7.1 – Do Consultees agree with the proposed methodology and scope of assessment?

The Scoping report details the assessment methodology including:

- *Assessment of Heritage Significance*
- *Magnitude of Impact*
- *Setting assessment*
- *Associated Transmission Infrastructure*
- *Significance of Effects*
- *Limitations and uncertainties*

Appendix 7.1 Cultural Heritage and Archaeology Baseline focussing on the known or potential presence of archaeological remains on site. The Baseline Study refers to figure 7.3 (Designated assets within 5km), figure 7.4 (Designated Assets within 15km and ZTV) and Appendix 7.2 Table 1 lists all the Designated Assets within 15km. However, this document does not discuss setting in detail. Whilst we largely agree with the methodology, we have the following comments concerning specific parts of the methodology in the Appendix 7.1 Baseline report and Scoping Report.

Appendix 7.1 Baseline

2.1.6 Objectives

This section identifies a number of objectives for the assessment including providing sufficient information on the baseline heritage resource to allow for informed decisions to be made in relation to direct/indirect (physical) impacts, as well as Setting Impacts within the Scoping Report (bullet point 3).

Appendix 7.1 discusses the nature of the designated heritage assets within the 1km site radius within the text. However, it does not discuss setting either in the 1km or 5-15km radius of the site. If this document is to be used to inform decisions on setting Impacts within the Scoping Report, this setting assessment is needed, otherwise, the reference to providing information to inform setting impacts should be removed from 2.1.6 bullet point 3.

3.2 Policy While the ES will expand on the detail in the National Policy Statements further, the potential need for evaluation should be flagged up at this initial stage when discussing general assessment principles. This section should therefore also highlight as a minimum:

- NPS EN-1 paragraphs 5.9.13-14 (this is included in the Scoping report)
- NPS EN-3 paragraphs 2.12.87-89
- NPPF 207, 208 and 216
- NCC Local Plan ENV 7.2, 7.3 and 7.6
- Historic England Advice Note 15: Commercial Renewable Energy Development and the Historic Environment (2021, paragraphs 32 & 44)

4.4 Previous Archaeological investigations

The applicant's archaeological consultant should request these reports from the Historic Environment Record as this will help to inform an understanding of the nature and archaeological potential of the study area.

6 Assessment of archaeological potential of the site

The 1km radius provides a broad indication of the archaeological potential of the site. However, not all archaeological sites will be visible on aerial photographs, Lidar or geophysical survey and this area has not been subject to extensive fieldwalking or intrusive fieldwork. Archaeological investigations in Northumberland over the past 20 years have demonstrated that a higher number of archaeological remains may be present than indicated using non-intrusive methods of investigation, including within forestry plantations.

In addition, the absence of known sites, particularly the Mesolithic, Neolithic and early medieval periods in the 1km radius may simply reflect the ephemeral nature of these sites and the lack of previous intrusive archaeological work. Based on the available evidence in the study area and across the county, it is more likely that the evidence for the following periods should be summarised as:

- Mesolithic and early medieval - unknown or low, not negligible.
- Neolithic - moderate to high - there is evidence on site of known and potential rock art, a potential standing stone and the potential for associated or more ephemeral remains.
- Roman - high – it is identified as high in the text (6.1) but moderate in the table 6.1, the table should be amended to reflect the text.

Scoping Report

7.2.2.1 and Table 7.1

These should also include as a minimum NPS EN-3 paragraphs 2.12.87-89. 7.2.2.2 should also include NPPF paragraphs 207 and 208. 7.3.2.3 The production of a detailed assessment of effects to setting as a standalone Technical Appendix to the Archaeology and Cultural Heritage ES Chapter is welcomed, along with the production of a table listing assets for inclusion within, or exclusion from, the assessment.

6.5.5 states that visualisations will be produced for the Proposed Development for viewpoint locations agreed with key consultees, once the detailed assessment has been undertaken of the indirect impact of the proposals on designated heritage assets, informed by the ZTV. I am happy to be involved in discussions about the nature and location of visualisations. It should be noted that not all key views towards and from designated heritage assets identified in the ZTV will have viewpoints included in the LVIA and the proposed viewpoints listed in Table 6.4 do not have Cultural Heritage listed as the basis for selection. The contribution setting makes to significance should inform the cultural heritage sites selected for further visual assessment with the understanding that setting is not necessarily just about visibility but can include noise and other impacts.

Table 7.3 Environmental factors to be scoped in or out of the assessment. I agree with the criteria detailed in this table for the scoping out of the majority of non designated and designated assets from an archaeological perspective. In this table, there is a presumption that decommissioning work will be wholly within the construction footprint of the proposed development and can therefore be scoped out. However, this does need to be confirmed and agreed to avoid archaeological impact at the decommissioning stage in areas which has not been subject to archaeological evaluation or mitigation.

Q7.2 – Do consultees have any information regarding current or recent archaeological work or projects being undertaken within or in the vicinity of the Proposed Development, particularly those whose results may not yet be recorded in the local HER datasets?

Current archaeological consultations within the planning process and the Historic Environment Record do not have any additional information about current or recent archaeological work or projects within the site and immediate surrounding area. While non-development management archaeological investigations also take place in the wider surrounding area, none have direct relevance to this scheme.

Q7.3 – Are consultees aware of any further sites with statutory protection within the wider landscape whose settings may be affected by the Proposed Development?

Given the height of the proposed turbines, they are likely to be visible from designated heritage assets over a much wider radius of the site with topography and tree cover less likely to mask their location. Rather than providing an exhaustive list of designated heritage assets in the wider area, the archaeological consultants should provide an assessment of the indirect impact of the proposals on designated heritages assets, informed by the ZTV and the nature and significance of the designated heritage assets and key viewpoints (see Q7.1 above). There should be further discussions about the nature and location of visualisations informed by that detailed assessment.

Built Heritage & Design Team Comments

This response is provided in respect of above ground, built cultural heritage, including Listed Buildings, Conservation Areas, World Heritage Sites, and relevant Non-Designated Heritage Assets (NDHAs) and Scheduled Monuments.

Q.7.1 – Do consultees agree with the proposed methodology and scope of assessment?

Having reviewed the submitted documents, based upon a desk-top assessment only, we broadly agree with the proposed methodology and scope of assessment, subject to the comments below:

Local Policy (Scoping Report, 7.2.3)

- *Northumberland Local Plan Policy ENV 1 should be included.*

Guidance (Scoping Report, 7.2.4)

- *Historic England Advice Note 12: Statements of Heritage Significance (Historic England, 2019) should be included.*

Cultural Heritage Study Areas (Scoping Report, 7.3.2)

The proposed 1km (direct impacts and effects), 5km (setting effects), and 15km (setting effects) Cultural Heritage Study Areas provide a reasonable starting point to identify the scope of the EIA; However, we note:

- Not all impacts within the 1km study area are likely to be a direct or indirect physical impact (i.e. there could – and will likely – be an impact on the setting and significance of a listed building or a NDHA) (Scoping Report, 7.3.2.1). This should be more clearly articulated – although it may be a typo that ‘setting’ has been omitted from para. 7.3.2.1. Some consideration should be given to setting and its contribution to significance in the Baseline Assessment.*
- Further information is needed as to the criteria that will be used to identify which NDHAs within the 5km and 15km study areas will be included in the assessment to determine whether it is appropriate (Scoping Report, 7.3.2.2 and 7.3.2.3).*
- It is noted that a ‘sieving exercise’ will be undertaken to determine which heritage assets will be referred to within the detailed Setting Assessment (Scoping Report, 7.3.2.3). Further detail is needed on the proposed methodology to determine whether it is appropriate.*
- As a general point, Historic England (2023) guidance is clear that a ‘standard distance to create a buffer zone around identified heritage assets is not recommended for commercial renewable energy developments, as impacts within setting which can affect significance vary according to topography and the characteristics of the asset and its surroundings’. Furthermore, the impact on setting and significance is not a simple question of visibility of a heritage asset from the development site. It requires careful thought about the role that setting plays in the significance of a heritage asset and the level of impact, and it can be affected by a range of other factors such as noise and disturbance, for example. In this context, we welcome the assertion that the 15km study area will not be used as an arbitrary cut-off point for assessing setting impacts. We would welcome further consultation on the methodology to establish which assets will be included or excluded beyond the 15km buffer and would reiterate that this will require a consideration of factors greater than intervisibility. To inform this process, the applicant may find it useful to undertake an initial assessment of setting and its contribution to significance as part of the Baseline Assessment, and to extend the Baseline Assessment beyond the 1km study area (on the basis that there may be significant setting impacts beyond this buffer). Without this, the Baseline Assessment cannot be relied upon to ‘provide sufficient information on the baseline heritage resource to allow for informed decisions to be made in relation to ... setting Impacts within the Scoping Report.’ (Baseline Assessment, 2.1.6)*

Temporal Scope (Scoping Report, 7.3.3)

- It is noted that impacts to setting will last the life of the development, but will be reversible (Scoping Report, 7.3.3.2). We note that the proposed development would have an operational period of 40 years, which is effectively a generation, and this cannot be considered a temporary impact. This should be acknowledged and given due weight in the assessment process.*

Effects to Setting (Scoping Report, 7.4.2)

- The initial identification of assets at risk of adverse impact to setting is set out at Section 7.4.2 of the Scoping Report and is based on the ZTV. It states that a full assessment of effects to setting will be undertaken in the ES, supported by a sieving exercise which aims to sieve out assets from assessment based on their value and sensitivity to changes in setting. For the reasons outlined above, as the consultation*

and assessment progresses, it may also be necessary to include additional assets beyond the 15km boundary, and this should be referenced again at 7.4.2.

Setting Assessment (Scoping Report, 7.5.3)

- *We welcome the intention to undertake the setting assessment in accordance with Historic England's (2017) guidance on this issue, which sets out a 5-step approach to assessment.*
- *We agree that the assessment of any setting impacts, should refer to the extent of the potential visual changes in setting as determined through the use of a bare earth ZTV and the Landscape and Visual Impact Assessment (LVIA) viewpoints. However, the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. It is important that this is reflected in the viewpoints chosen for the LVIA.*
- *The wider effects of the development may also be relevant considerations for the impact on setting for some assets (see Historic England, 2017, page 13). This should be articulated in the methodology for the Cultural Heritage and Archaeology Chapter, with reference to the relevant assessment that will form part of the EIA (e.g. noise, light shadow flicker etc).*

Scope of the ES Chapter (Scoping Report, 7.7)

Table 7.3: Environmental Factors to be Scoped In or Out of the Assessment

- *Table 7.3 'scopes in' the 'Cumulative Effect of the Proposed Development in conjunction with other wind farm developments within 15 km. However, developments to be considered as part of the cumulative assessment should not be limited to the same type of development as the proposed NSIP. Other possible developments should be identified if appropriate.*
- *It may be possible to 'scope out' setting impacts to all NDHAs of Local Importance (as defined by the HER); However, in the absence of any description of setting and contribution to significance as part of the Baseline Assessment, this needs further justification.*
- *Table 7.3 'scopes out' setting impacts to 'Grade II* and II Listed Buildings beyond 5km where they are located within or clearly associated with nucleated settlement'. Again, in the absence of any description of setting and contribution to significance as part of the Baseline Assessment, further assessment and justification is needed for the exclusion of this category of heritage assets, and this should be done on a case-by-case basis.*
- *Table 7.3 'scopes out' the impact resulting from the Decommissioning Phase of the Proposed Development. We would recommend that this is kept under review as the Decommissioning Plan is developed.*

Q.7.3 – Are consultees aware of any further sites with statutory protection within the wider landscape whose settings may be affected by the Proposed Development?

At this stage, based upon a review of the submitted information, it is difficult to ascertain whether there could be any further sites with statutory protection within the wider landscape whose settings and significance may be affected by the proposed development. Given the height of the proposed turbines, there is potential that the proposed development could be visible from designated heritage assets over a much wider radius from the site – with the ZTV (Appendix B, Figure 7.4), clearly showing visibility of the turbines extending well beyond the 15km buffer. Whilst recognising the need for proportionality, we would recommend that a further sieving exercise is undertaken with consideration given to designated assets beyond the 15km buffer.

Q7.5 – Are consultees aware of any additional stakeholders who will require consultation or where consultation would be desirable?

We note that all cable corridor options identified to date pass through Hadrian's Wall (Scoping Report, 7.3.7). The applicant may wish to consider consulting UNESCO or ICOMOS as part of the wider consultation process.

The County Council considers that the applicant should take the above information into account in preparing the ES.

Chapters 8 and 9: Ornithology and Ecology and Nature Conservation

The County Ecologist makes the following comments on these chapters.

'I broadly concur with the scope of ecological survey and assessment work set out in the Scoping Report, but I do have some comments as follows: SSSIs The following sites are missing from Table 9.3 Statutory Designated Sites within 5km of the Scoping Boundary:

- Redesdale Ironworks*
- Bavington Crag*
- Settlestones Mine*
- Fallowfield Mines*
- Brunton Bank Quarry*

While Local Wildlife and Geological Sites (LWGS) are included in Figures 8.1a 'Relevant Designated Sites within the Wind Farm Study Area' and Figure 8.1b 'Relevant Designated Sites within the Grid Connection Study Area', they appear to be completely overlooked in the proposed assessment set out in Chapters 8 and 9 of the Scoping Report. This is a serious omission, not least because the proposed windfarm site itself is largely within a LWGS and a number of other LWGs lie partly within or adjacent to the potential cable routes. Accordingly, potential impacts on them should be carefully assessed.

Figures 8.1a 'Relevant Designated Sites within the Wind Farm Study Area' and Figure 8.1b 'Relevant Designated Sites within the Grid Connection Study Area'. Both Special Protection Areas and Special Areas of Conservation are missing from these plans.

Important waxcap grasslands occur quite widely in this part of Northumberland, although records are very incomplete. Accordingly, waxcaps should be added to the features for which survey and assessment will be undertaken on suitable grassland habitats.

Much of the site of the proposed development is within the area in which the operators of Ray 1 Windfarm must implement a Habitat Management Plan for the lifetime of that development. It is important that the interaction between that ongoing obligation and the new proposed windfarm are fully assessed.

The County Council considers that the applicant should take the above information into account in preparing the ES.

Chapter 10 Geology, Peat and Soil

The County Council supports the comments submitted by the Northumberland National Park Authority on this chapter.

10.2.3 Northumberland Local Plan ENV 2 is also relevant.

Chapter 11 Water Resources and Flood Risk

The Council's Environmental Protection team confirm that there are no private water supplies within the area of the proposed development, however, there is at least one near the boundary. They recommend that the applicant contacts their Private Water Supply team and where necessary considers the impacts of the proposed development upon aquifers and existing non-mains water supplies.

The Lead Local Flood Authority (LLFA) make the following comments on this chapter.

'This proposal would be classed as a major development. Any future planning application will be required to be supported by a site-specific Flood Risk Assessment (FRA) and a Drainage Strategy'.

Q11.1 - Are consultees content with the proposed methodology and scope of the assessment of the water resources and flood risk assessment?

The LLFA is broadly content that a standalone FRA and Surface Water Hydrology Assessment are scoped in. However, the methodology and scope of the FRA must explicitly include:

- *Quantification of surface water flood risks (including depths, extents, hazards) and topographical analysis of off-site overland flows.*
- *A robust assessment of groundwater flood risk.*
- *Assessment of fluvial risk from all Ordinary Watercourses on, adjacent to, or uphill from the site (e.g. Black Burn, Ottercops Burn), establishing the Design Fluvial Level for the 1 in 100 year plus climate change event where flooding from the watercourse may affect the site.*
- *A comprehensive, standalone Surface Water Drainage Strategy for the operational phase that restricts runoff to greenfield rates and accommodates the 1 in 100 year plus climate change event.*
- *Application of the latest Environment Agency climate change allowances for the specific management catchment (peak rainfall intensity and peak river flow).*

Q11.2 - Do consultees have any information that would be useful in the Preparation of the water resources and flood risk assessment?

Please see below for further advice on the Drainage Strategy and Flood Risk Assessment.

Legislation and Policy

- *National Planning Policy Framework (NPPF, 2024)*
- *Planning Practice Guidance – Flood Risk and Coastal Change*
- *National Standards for Sustainable Drainage Systems (DEFRA, June 2025)*
- *DEFRA Supplementary Guidance to the National Standards (2025)*
- *Northumberland Local Plan*

Drainage Strategy

General Requirements

Any future Drainage Strategy must demonstrate full compliance with the National Standards for Sustainable Drainage Systems (DEFRA, 2025). The LLFA will assess submissions against these Standards and the associated DEFRA supplementary guidance, which sets out the evidence required to demonstrate compliance. While this scoping report response focuses primarily on National Standards 1–3, which address runoff destination, interception, and flood risk management, any future Drainage Strategy will be required to demonstrate compliance with all seven National Standards. The Drainage Strategy must clearly explain the drainage philosophy for the site and be supported by appropriate drawings and calculations. Preference must be given to the use of sustainable drainage systems (SuDS) in accordance with paragraph 182 of the NPPF (2024). Applicants are encouraged to review the LASOO guidance on drainage strategies <https://www.suds-authority.org.uk/knowledge-resource/>

National Standard 1 – Runoff Destinations

Runoff from the development must be discharged, to the maximum extent practicable, in accordance with the following hierarchy:

1. Collected for non-potable reuse
2. Infiltrated to ground
3. Discharged to an above-ground surface water body
4. Discharged to a surface water sewer or other piped surface water drainage system
5. Discharged to a combined sewer

The Drainage Strategy must clearly demonstrate how the proposed discharge location complies with National Standard 1, including a reasoned and evidenced justification where higher-priority options within the hierarchy are not feasible. Where infiltration is discounted, this must be supported by site-specific ground investigation and infiltration testing, with clear justification provided within the drainage strategy.

National Standard 2 – Management of Everyday Rainfall (Interception)

In accordance with National Standard 2, the Drainage Strategy must demonstrate that the first 5 mm of rainfall from all positively drained impermeable surfaces is intercepted for the majority of rainfall events. This must be evidenced through:

- A plan identifying each positively drained impermeable surface and the associated interception method;
- Calculations demonstrating that each SuDS feature has sufficient vegetated plan area to intercept the first 5 mm of rainfall from its contributing impermeable area; and
- Clear confirmation of whether interception is achieved through collection for reuse, direct infiltration, or conveyance to vegetated SuDS features. Interception should be delivered through source control SuDS distributed throughout the development wherever practicable.

National Standard 3 – Management of Extreme Rainfall and Flooding

The Drainage Strategy must clearly demonstrate compliance with National Standard 3, including:

- Greenfield runoff rates for the 50% AEP and 1% AEP rainfall events;
- The greenfield runoff volume for the 1% AEP (6-hour) rainfall event;
- The proposed runoff volume for the 1% AEP (6-hour) rainfall event;
- Proposed discharge rates for all events up to and including the 1% AEP event;
- Attenuation volumes required to ensure that runoff rates from the developed site do not exceed equivalent greenfield rates; and
- Confirmation that there is no flooding of property for the 1% AEP event including a 45% allowance for climate change.
- Pre- and post-development runoff rates must be provided, and attenuation volumes must be consistent across all reports, calculations, and drawings.

The design must also consider:

- Exceedance during events in excess of the design standard;
- Blockage of flow controls; and
- Potential submergence of outfalls.

Exceedance flow routes must be clearly demonstrated on plans and shown to route flows safely without risk to people or property on or off site.

Flow Controls and Blockage Risk

Where flow controls are proposed, the Drainage Strategy must identify the minimum opening size and demonstrate how blockage risk has been assessed and mitigated, in accordance with National Standard 3.

Where outfalls may become submerged during flood conditions in receiving water bodies, the drainage system must be assessed under submerged outfall conditions, with the impact on system performance clearly demonstrated.

Use of Sustainable Drainage Systems (SuDS)

The LLFA expects green, vegetated SuDS features to form the backbone of the drainage strategy, with source control and site control measures integrated throughout the development. Drainage features should deliver multifunctional benefits, including water quantity control, water quality improvement, biodiversity enhancement, and amenity value. In Northumberland, oversized pipes and underground storage tanks are not classified as SuDS, as they do not deliver the multifunctional benefits required by the National Standards. Where green SuDS are not proposed, a clear and evidenced justification will be required.

National Standards 4–7 – Other Requirements

In addition to the requirements outlined above, the Drainage Strategy will need to demonstrate appropriate consideration of:

- National Standard 4 – water quality;
- National Standards 5 and 6 – amenity and biodiversity; and
- National Standard 7 – design for construction, operation, maintenance, and structural integrity.

At application stage, proportionate information is expected to demonstrate that SuDS features are appropriately designed to manage pollution risks, deliver amenity and biodiversity benefits where practicable, and can be safely constructed, accessed, and maintained for the lifetime of the development. Detailed management,

maintenance, and construction-phase information may be secured by planning condition where appropriate.

Drawings and Supporting Information

For any future planning application, the Drainage Strategy must be supported by drawings and calculations sufficient to demonstrate compliance with National Standards 1–3, including:

- Drainage layout plans;*
- Construction details for all SuDS components;*
- Long and cross sections of basins, swales, and other SuDS features;*
- Confirmation of top water levels within SuDS features and any receiving water bodies; and*
- An exceedance flow routing plan.*

All drawings and calculations must be consistent with one another.

Flood Risk Assessment

A site-specific Flood Risk Assessment will be required to support any future planning application. The FRA must assess flood risk from all sources, including fluvial, pluvial, groundwater, sewers, ordinary watercourses, and infrastructure, and must clearly demonstrate how the proposed drainage strategy has been informed by these risks. To enable the LLFA to undertake a full review of the aspects within our remit, the FRA must, as a minimum address:

Surface Water Flood Risk

Evaluation of existing and potential future surface water flow paths, depths, and velocities affecting the site (including an allowance for climate change). Proposed measures to avoid, control or mitigate the risk including appropriate Finished Floor Levels (where appropriate). The approach must comply with Planning Practice Guidance on Flood Risk and Coastal Change. Demonstration that the development will not increase surface water flood risk elsewhere by displacing water or altering flow paths.

Ordinary Watercourse Flood Risk

Identification of any ordinary watercourses on or near the site. Analysis of design flood levels and extents, including an allowance for climate change. Proposed mitigation measures, including appropriate Finished Floor Levels where relevant.

Groundwater Flood Risk

An assessment of the risk of groundwater flooding to the development, considering local data sources (NCC's Strategic FRA, EA maps, BGS data, ground conditions) and site specific investigations where necessary.

Proposed mitigation measures if a risk is identified.

Further detail on the requirements of a site specific FRA is available here:

National Planning Policy Framework (NPPF) - Chapter 14:

<https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change>

Flood Risk and Coastal Change Planning Practice Guidance (see paragraph 80 for a checklist): <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

Flood risk assessment for planning applications: <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

Flood risk assessment: standing advice (for specific technical advice): <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice>

Conclusion

A Flood Risk Assessment and Drainage Strategy will be required to support any future planning application.

The Drainage Strategy must demonstrate full compliance with the National Standards for Sustainable Drainage Systems (2025), prioritise the use of green, multifunctional SuDS, and ensure that surface water runoff is managed at greenfield rates and volumes without increasing flood risk on or off site.

Application documents likely to be required

- *Flood Risk Assessment*
- *Drainage Strategy*
- *Drainage layout plans and SuDS details*
- *Exceedance routing plan*
- *Hydraulic calculations*
- *Health and safety information (where applicable)*

Note: This advice is based on the information available at this stage and represents a preliminary LLFA assessment. Further or more detailed information may be required as proposals evolve’.

Chapter 12 Access, Traffic and Transport

The Local Highway Authority make the following comments on this chapter and related transport information.

‘When assessing an EIA Scoping Request application, the Local Highway Authority need to consider whether the scope of the methodology used appropriately addresses the potential Highway effects of the development within a subsequent EIA to accompany a future application.

The use of Institute of Sustainability and Environmental Professionals (ISEP) (formerly the Institute of Environmental Management and Assessment (IEMA)) Guidelines: Environmental Assessment of Traffic and Movement (July 2023) to identify the effects of increase in road traffic from development is deemed acceptable and shall be applied to all finalised operational, construction and decommissioning routes to and from the development. As stated in the Scoping Report impacts cease to be negligible beyond an increase of 30% of the baseline AADT traffic flows for all traffic and for HGV movements with this increase reducing to 10% on highway links

of high sensitivity. The areas of high sensitivity will be determined upon confirmation of these routes.

It would be anticipated that there would be no operational effects of any increase of traffic from the development due to the low number of maintenance vehicles required to manage and maintain the wind farm and cable connections proposed. This will need to be demonstrated as part of the EIA chapter as no baseline or operational traffic flow data has been submitted in the Scoping Report to determine this.

Similarly, there is no data provided in respect to the Decommissioning Phase of the development to determine whether this should be scoped out of the assessment and therefore evidence will need to be provided to demonstrate that the thresholds for impact are not met.

The methodology set out in the Scoping Report in respect to the construction impacts is acceptable, however, until such time as the Cable Route and construction methodology has been defined through the pre-application process, it is not possible to fully define the sections of the network to which the assessment will have to include. This work will need to be undertaken before the Scope of the assessment could be agreed but it shall be based upon the methodology set out in terms of screening links in line with The Institute of Sustainability and Environmental Professionals (ISEP) (formerly the Institute of Environmental Management and Assessment (IEMA)) Guidelines: Environmental Assessment of Traffic and Movement (July 2023).

The scope of the assessment, along with the scope of a Transport Assessment and Travel Plan, that would be required to be submitted with the upcoming application shall be agreed with the Local Highway Authority for impacts and assessments on the Local Highway Network. This will need to be undertaken alongside agreements made with the Strategic Highway Authority for effects on the Strategic Road Network (A1, A19, A69 and A696 (A1 to Newcastle Airport only) for consistency of methodology.

The Local Highways Authority will also engage with the applicant through the formal pre-application process for other highway related matters relevant to the application and commentary on matters outside the Scoping Study will be made as part of this pre-application process.

Q12.1 *We are content with the methodology set out in the Chapter 12 of the Scoping Report however final details need to be agreed and a separate scope will require development and approval in respect to the Transport Assessment to be submitted with the application.*

Q12.2 *All Abnormal Indivisible Loads will be required to be assessed under the standard procedure for managing such matters. The proposed route from Port of Blyth to the development site via the A1 and A696 was assumed to be used for the Ray Wind Farm although the applicant should consider changes to the network since that time. Dependent on which part of Port of Blyth the turbines are delivered to, the route may use the A1061 from the southern section of the Port and therefore the applicant is advised of the potential conflicts for deliveries if these are to occur before or during the construction of the Blyth Relief Road that received planning approval under reference 25/01985/CCDEIA.*

Q12.3 *Traffic generation data for the operational and decommissioning traffic from the development shall be provided in the EIA to demonstrate why this has been scoped out of the assessment as per paragraphs 4.3 and 4.4 of this response.*

Q12.4 *There is no additional guidance or policies that the applicant should be aware of in respect to the EIA Scope but general guidance and documentation in relation to construction standards and Highways Agreements pursuant to the Highways Act 1980 (as amended) can be found on the Highways Development Management Pages of the Northumberland County Council website.*

Concluding Highway Authority Comments.

The Scope of the Transport chapter of the EIA Scoping is broadly acceptable in highway terms subject to the above comments and the methodology set out in the accompanying documents being adhered to and that additional links that fall under the self-screening of the network are subsequently included in the ES.

The applicant is strongly advised to enter into formal pre-application discussion in order to ensure the assessment of the development is acceptable and that no abortive work is undertaken in advance of the application being submitted.

Chapter 13 Noise and Vibration

The Council's Environmental Protection Team have been consulted by the acoustic consultants (ERM) working on behalf of the applicant to provide comments upon the proposed noise assessment methodology and agreed receptors. ERM have identified 116 receptors locations and proposed noise monitoring at ten locations (depending upon access) for approximately one calendar month. It is expected that this proposed noise impact assessment will form part of the ES.

It is unlikely that vibration will be generated from the operational phase of the Development, however, should piling be required to create suitable foundations for any of the turbines, then a vibration impact assessment following accepted guidance may be required for the ES depending upon proximity of receptors.

Chapter 14 Climate Change and Greenhouse Gas Emissions

The County Council supports the comments submitted by the Northumberland National Park Authority on this chapter.

Chapter 15 Socio-economics, Tourism and Recreation

The County Council welcomes the commitment to consult with the Council on socio-economic, tourism and recreation topics. The Council's Public Rights of Way team will be an important consultee. It is recommended that the Northumberland National Park Authority should also be consulted on these topics.

Concluding Comments

Please note that the absence of comments on any specific topic does not necessarily mean that the County Council would not wish to identify matters for consideration at subsequent stages in the consideration of the proposed

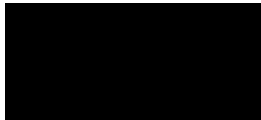
development.

The Council welcomes the commitments in the Scoping Report given by the applicant to continue to engage and consult with the County Council in developing its proposals.

The applicant is strongly advised to enter into formal pre-application Discussion with the Council's Planning Service in order to ensure the assessment of the development is acceptable and that no abortive work is undertaken in advance of the application for a Development Consent Order being submitted.

The County Council has received comments on the Scoping report from Kirkwhelpington and Elsdon Parish Councils. As we are unaware whether the Councils have sent you their comments direct, they are attached for your information.

If you require further information at this stage, please let me know.



Gordon Halliday
Consultant Planner
Development Management Team

Date : 28 May 2026
Our Ref : 26NP0050SCOPE
Your Ref : Ray II Wind Farm
Contact : Jenny Ludman
Direct Line : [REDACTED]

Dear Lucy,

Proposed Extension of Windfarm at Ray Wind Estate: EIA Scoping and Consultation and Regulation 11 Notification

Thank you for consulting the Northumberland National Park Authority on the Scoping Report for the proposed Ray II Wind Farm development in the Rede Valley south east of the village of Otterburn.

Having read through the Scoping Report and accompanying documentation for this proposed development, I wish to make the following observations on behalf of the National Park Authority [‘the Authority’].

The Authority understands that this is a proposal to construct up to 20 wind turbines, up to 230 meters in height, with the application site abutting the National Park boundary at its nearest point, Winter’s Gibbet, itself a notable landmark on the southern edge of Harwood Forest.

The study area for the project also includes an investigation for the powerline connection from the project site to the National Grid substation at Fourstones in the Tyne Valley (para. 4.6.3). Each of the three corridors under investigation for either an overhead or underground line do in fact come through the National Park at Tower Tye on the Military Road, so the National Park is likely to be directly and indirectly affected as a result of this proposed development.

The Authority’s initial thoughts are that this proposal, due to the proposed location, number, and size of turbines, does has the potential to have a significant effect upon the views, visual amenity and special qualities of the National Park, based upon the Zone of Theoretical Visibility map, (Figure 6.5) in Appendix B, Part 1. We have particular concerns regarding the impact when viewed from certain elevated viewpoints, particularly those associated with the well-used National Trails, promoted routes and public rights of way that traverse the National Park landscape, access land and other publicly accessible sites. There are also potential implications for the Dark Sky Park status of the National Park.

We hope the following comments will ensure that the full extent of the effects can and will be determined by the EIA process in due course. As such, the Authority welcomes this initial engagement by the applicant and recognition that we have been identified as a statutory consultee in Section 4.7 of the Scoping Report.

Considerations of the sections within the Scoping Report

Section 1 - Introduction

Paragraph 1.2 The Applicant - The Authority notes the applicant refers to the existing Ray Wind Farm that is located adjacent to the proposed development. This became operational in 2017 and has a capacity of 54.4 MW across 16 turbines and generates enough electricity to power 30,000 homes annually.

There is also mention of the £250,000 per year Community Fund that supports local initiatives. We find it difficult to understand why an organisation that is involved in electricity generation, seeking to further its generation within Northumberland, has not sought to support the country's largest off-grid community, enabling them to benefit from the electricity generated at Ray. With 7% of National Park residents living off-grid, not by choice, and an estimated 400 properties across the County, it would be nice to think that electricity generated locally could actually be used and consumed by those that the proposed development is likely to have most effect upon? We would be interested in the applicant's views on this off-grid matter.

Section 3 - Environmental Impact Assessment Process

Answers to specific section questions:

Q3.1 - Do consultees agree with the approach to the EIA and the general strategy for assessing the effects?

Answer: Generally, yes, but we believe that in terms of wildfire risk, the current focus appears to be assessing the risk to the development from wildfire rather than looking at assessing the risk to wildfire to the surrounding upland moorland and afforested landscape arising from the development and its associated infrastructure. We also believe that some key receptors and promoted routes have been overlooked and that the effect of night-time lighting needs to look at the effect upon the status of the International Dark Sky Park designation.

Q3.2 - Do consultees agree with the approach to the assessment of cumulative effects?

Answer: Yes

Q3.3 - Do consultees agree that developments that are in the scoping phase do not need to be considered as part of the cumulative assessment and will not be referred to in the ES?

Answer: Yes

Q3.4 - Can the consultees provide any further information on developments that they think should be referred to in the cumulative assessment?

Answer: Not at this current time.

Section 4 - Policy and Legislative Context

Paragraph 4.6.3 - In terms of the NNP Local Plan and current policies listed in Table 4.2, we believe that Policy DM1, Community Facilities and Infrastructure should be listed and an assessment made that includes reference to that policy.

Northumberland National Park - This section should also identify the Northumberland National Park Management Plan.

Also, since the Planning Inspectorate is managing the process, as identified in paragraph 1.1, and the Secretary of State for Energy Security and Net Zero (SOS) will determine the application, the Authority would suggest that it is appropriate that the policy section ought to identify and set out the Statutory requirements of Section 11A of the National Parks and Access to the Countryside Act 1949 as amended by Section 245 of the Levelling-up and Regeneration Act 2023.

This is clearly a development proposal that would further industrialise the rural landscape of Northumberland and there needs to be consideration as to the effects this would have on the special qualities of Northumberland National Park. Is the proposed development in keeping with the two statutory purposes of National Parks?

Answers to specific section questions:

Q4.1 - Are there any additional planning policy documents at the local or national level which the Applicant should consider in the preparation of the application and EIA?

Answer: Yes – Northumberland National Park Local Plan Policy DM1 (Community Facilities and Infrastructure) should be listed as well as the **Northumberland National Park Management Plan 2023-2027** which is a statutory part of decision making in the Authority area.

Section 5 - Design Iteration and Layout

The Authority notes the rationale behind the site selection listed in S.5.2.1, particularly the point suggesting that *'locating the proposed development alongside the existing Ray Wind Farm enables development to be concentrated within an area already characterised by wind energy infrastructure. This approach reduces the potential for the dispersion of impacts across the wider landscape and aligns with good practice in reducing effects. This consideration is particularly important given the limited availability of unconstrained land within the county, which includes extensive designated areas'*.

We would remind the applicant that the 10 English National Parks were identified and designated for their natural beauty and so stating that co-locating the Ray II windfarm proposal adjacent to Ray I enables development to be concentrated within an area already characterised by wind energy infrastructure implies that the sense of natural beauty in the part of the National Park adjacent to the development site has already been lost. **We do not necessarily agree with this assumption.** The intensification of an industrialised landscape is likely to have **further impacts** on the setting of the Northumberland National Park, and this needs to be thoroughly assessed.

Section 6 – Landscape

The Authority appreciates that the wind turbine application site lies just outside the boundary of the National Park and that the cable connecting corridor options do indeed enter the National Park. In relation to Para.6.2.4 Guidance (p.58), we would suggest that the NNPA Landscape Character Assessment (LCA) 2019 should also be included alongside the already cited 2010 NCC LCA, because of the proximity of the development to the National Park. Character areas generally do not have a hard fixed boundary, and this more recent assessment is more up to date. We do note that Figure 6.2 does however identify the NNPA LCAs.

Baseline Conditions and Key Sensitivities (Para.6.3.1.4): Tourism and Recreation: We would request that the two National Trails, **Pennine Way** and **Hadrian's Wall Path** should be identified as receptors with key sensitivities along with **The Pennine Cycleway, the Sandstone Way and St Oswald's**

Way. This proposed amendment should also be reflected in Table 6.3, under Recreational Receptors.

LVIA Assessment Methodology (S.6.5): We note and welcome the fact that this will be prepared in accordance with the principles of best practice as set out in the guidance documents listed. With regard to the photography used for visualisations, we would draw the applicant's attention to the Scottish Natural Heritage's 2017 publication entitled - *Visual Representation of Windfarms* and in particular paragraph's 109, 110 and 111 that stress that it is essential that all baseline photographs are taken in good visibility with clear skies so that there is a distinct contrast between the proposed development and the skyline; particularly for long-range views.

Para. 6.7.2: We welcome the fact that the LVIA will consider potential effects on all landscape character and visual receptors within an initial study area of 45km from the development site in line with (para. 48 p.12) of the above-mentioned 2017 SNH publication for developments of this nature, (i.e. turbines in excess of 150 meters high). However, we note that the detailed study area is likely to drop down to 20km whilst targeted assessment of national level landscape designations and/or identified key visual receptors/viewpoints will still be undertaken beyond 20km '*where potential for likely significant effects is identified at initial assessment stages*'. The Authority confirms that it does not find the need to put forward any such additional visual receptors/viewpoints within the National Park as part of this response.

Para. 6.7.7: Landscape and Visual Receptors. We are happy with the receptors scoped in, with the amendments previously suggested, and welcome the fact that the development's effect on the Northumberland International Dark Sky Park status is to be assessed.

Para. 6.7.8: Mention here that viewpoints will be selected to represent a range of views and viewer types including settlements, transport routes, recreational routes, main visitor locations, landscape character areas/landscape character types and landscape designations. Given that some of the viewpoints will be in the National Park this is another reason why the NNP 2019 Landscape Character Assessment should also be used alongside that of NCC's 2010 LCA.

Viewpoints

Table 6.4 'Proposed Viewpoints': The figures and direction details in the 'Distance and Direction to the Proposed Development' column are incorrect. - For example, we believe that VP. 22, (Hadrian's Wall) is further than 680 meters from the development site.

NNPA's observations on suggested viewpoints include:

- VP. 6 - Winter's Gibbet - Agree
- VP. 14 - B6341 N of Elsdon - Agree
- VP. 15 - Trig on Corsenside Common - Agree
- VP. 16 - A68 north of B6320 - No - Suggest A68 Lay-By at 388291 589716
- VP. 19 - Pennine Way south of Bellingham - Agree but from 384047 581632
- VP. 20 - Summit of Simonside - Agree
- VP. 22 - Limestone Corner (Milecastle 30) - Agree
- VP. 24 - Pennine Way Padon Hill - Agree
- VP. 27 - Copper Snout/ Clennell Street - Agree since the TV suggests that the development would be visible from this location, however we would suggest that this would be at the very edge of any significant effect?
- VP. 29 - View south from Elsdon - Agree

To the above list of viewpoints we would request **two additional viewpoints** on promoted long-distance routes should also be included:

VP. 31 - Pennine Cycleway on Bellingham to West Woodburn Road at (388921 586639)

VP. 32 - Sandstone Way and St Oswald's Way at (400276 589765).

Answers to specific section questions:

Q6.1 - Are there any comments on the overall methodology proposed to assess effects on landscape and visual receptors, or to assess cumulative effects?

Answer: Methodology generally as expected. We would suggest that the NNPA Management Plan and NNPA Landscape Character Assessment 2019 should also be used to help inform the development/EIA process.

Q6.2 - Are there any comments on the proposed Study Areas?

Answer: No; initial study area of 45km with a detailed study area of 20km, with the caveat set out in Para. 6.7.2 is understood and accepted.

Q6.3 - Are there any comments on the proposed list of assessment viewpoint locations?

Answer: Yes. See suggestions listed above.

Q6.4 - Which viewpoints do you consider would be helpful to assess effects associated with aviation lighting.

Answer: All those within the Northumberland International Dark Sky Park and an assessment should be made as to whether the proposed level of new lighting would have a significant effect upon the Dark Sky Park status of the National Park.

Q6.5 - Has the consultee identified any further landscape or visual receptors that could be considered within the assessment (i.e., where it is expected that likely significant effects may occur)?

Answer: Yes, the Pennine Cycleway, Sandstone Way and St Oswald's Way promoted routes.

Q6.6 - Are there any other relevant consultees who should be consulted with respect to the LVIA?

Answer: We are not aware of any.

Section 10 - Geology, Peat and Soil

In reference to paragraph 10.4 fourth bullet point. '*Disturbance of Deep Peat during construction and decommissioning*': The Authority would request that this be changed to '*Disturbance of **All Peat** during construction and decommissioning*'; Following publication of the England Peat Map in 2025 and the publication of updated heather burning regulations in 2025, Government has amended, and is moving away from, a definition of 'Deep Peat', accepting that all peaty soils are important for their hydrology and long-term carbon store. **The second line in table 10.3 should be updated to reflect this.**

As a member of the Northumberland Peat Partnership, the Authority would like to see more detail relating to the track construction design and turbine mounting platform area with hard standing for crane support, to better understand the depth and extent of peaty soils needed to be excavated as a result of this development proposal.

Answers to specific section questions:

Q10.1 - Do you agree that the data sources identified are sufficient to inform the Geology and Peat baseline for the EIA (and therefore that no further baseline data collection is merited)?

Answer: We would recommend that the Northumberland Peat Partnership be approached to see if they have any specific local data over and above that that has been listed.

Q10.2 - Have all Geology and Peat receptors and potential impacts that could result from the Proposed Development been identified?

Answer: Yes, for the development site but not the Scoping Boundary/Study Area.

Q10.3 - Do you agree with the proposed approach to assessment for each of the impacts in Section 10.4 and scoped in or out of the ES Report in Section 10.7 for Geology and Peat?

Answer: No. See note above.

Q10.4 - Do you agree that the embedded mitigation measures described provide a suitable means for managing and mitigating the relevant potential effects of the Proposed Development on Geology and Peat receptors?

Answer: No comment.

Q10.5 - Do you have any information that will be useful in the preparation of the Geology and Peat assessment, such as information on local quarrying or infilled land?

Answer: We would recommend that the Northumberland Peat Partnership be approached to see if they have any specific local data in addition to that listed.

Section 14: Climate Change and Greenhouse Gas Emissions and Section 16: Other Issues

Section 14.3.2 and 14.4.2 -Climate Risk Assessment: The Authority notes and welcomes the statement to use the ERM's Global Climate Database to assess forest fire 5 danger index which provides baseline and future climate data specific to wildfires. However, much of this section on the climate risk assessment references the risk of the proposed development to wildfire. See note below.

Table 16.7: Environmental Factors to be Scoped In or Out of the Assessment and Q16.10 On p.406: We suggest a review of the decision to scope out Major Accidents and Environmental Disasters on p.404 for the following reason: Just 9 km away, on the Otterburn Ranges, there was a **significant wildfire** in 2018 that burnt for six weeks, covered in excess of 7km² and released over 67,000

tonnes of long-term stored carbon into the atmosphere. Wildfire risk is on the increase and in 2025, there was a record number of wildfires recorded across the county of Northumberland. We suggest that the risk of wildfire is properly assessed, not just to the development but for the scenario where a wildfire originates from the development itself.

Research indicates that globally, on average, 117 wind turbine fires occur annually and such instances themselves could lead to a **significant wildfire** unless properly planned for and controlled. With the site sitting on peaty soils and adjacent to Harwood Forest, a commercial conifer forest, a full wildfire risk assessment and mitigation plan ought to be produced for this development proposal.

Answers to specific section questions:

Q14.1 - Are consultees content with the proposed method of assessment for the effect of the Proposed Development on climate change (GHG Assessment)?

Answer: No. We would request that a wildfire management planning process is undertaken for the existing and proposed Ray windfarm sites and in so doing a better understanding of the existing carbon fluxes is obtained, both from surface vegetation and existing long-term stored peat. Given that nationally over 80% of peaty soils are deemed to be degraded, low water table with the peat oxidising and releasing carbon, are the peaty soils associated with the development site in healthy functioning state or currently contributing to GHG emissions?

Q14.2 - Are consultees content with the proposed scope and methodology of the CCRA?

Answer: No, see note above but scope for wildfires needs to be extended but yes generally happy with the proposed scope and methodology identified.

Q14.3 - Are consultees content with the proposed method of assessment for the effects of climate change on environmental effects identified in the other chapters of the ES (the ICCI Assessment)?

Answer: As above.

General observations: On reading the Scoping Report we noted that a number of the website links to the reference material are now out of date and no longer working, e.g. Ref. 40,41,42,45,48, etc. indicating that the destination sites have been updated and the links are now out of date.

We hope you will take the points raised in this letter into consideration, and we welcome a continued dialogue on this matter.

Yours sincerely,



Jenny Ludman MRTPI
Head of Development Management

e-mail: planning@nnpa.org.uk

From: Planningsouth <planningsouth@spenergynetworks.co.uk>
Sent: 11 May 2026 12:00
To: Ray II Wind Farm <RayIIWindFarm@planninginspectorate.gov.uk>; Planningsouth <planningsouth@spenergynetworks.co.uk>
Cc: Edwards, Steven [REDACTED]@spenergynetworks.co.uk>
Subject: RE: EN0110031 - Ray II Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification

Thank you for the below consultation.

As this proposed development is not in the SP Manweb licence area, no comments will be made on the application.

Regards

Steve



Steven Edwards | Senior Environmental Planner | **Land & Planning**

Tel: [REDACTED] | Int: 45656 | Mob: [REDACTED]

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**For the attention of: Ms L Morgan – Associate Environmental Advisor
The Planning Inspectorate**

2nd June 2026

Our ref ENSIP-51

Dear Ms Morgan

Re: EN0110031 Ray II Wind Farm - 20 turbines, tip height is up to 230m, turbine foundations, crane hardstandings and laydown/storage areas, supported by other ancillary infrastructure and elements, including substation, control building, construction compounds, borrow pits, meteorological mast, cabling, access routes and habitat management areas. Battery Energy Storage System also included.; Ray II Wind Farm Project located In Northumberland, Adjacent (north) to the existing Ray Wind Farm, Approximately 1 Km South of Raylees

Thank you for your notification of the 7th May 2026 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that the site, as identified on Figure 1.1b - Proposed Order Limits, lies within areas where coal mining features are present at surface and shallow depth. These features, including mine entries and coal workings, pose a potential risk to surface stability and public safety. For clarity, it appears that only the area of the cable runs is within the defined Development High Risk Area.

The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

The Scoping Report submitted, dated May 2026 and prepared by ERM, acknowledges that coal mining features are recorded to be present, especially in the areas of the cable runs. We are pleased to see that mining is scoped in and will be assessed within the EIA.

Section 10.5.2 in the Scoping Report states that a Coal Mining Risk Assessment (CMRA) will need to be undertaken to assess the potential for ground instability. The report authors state that the CMRA should define the scope of intrusive ground investigation, such as boreholes, where required to confirm ground conditions and inform the detailed design of the chosen cable route and any engineering controls or mitigation measures, including potential refinements to the cable alignment, stabilisation measures or specific trench design requirements necessary. They conclude by noting that the outcomes of the CMRA will be used to inform the refinement of the cable route and will be incorporated into the detailed design to ensure that any coal-mining-related risks are fully understood and appropriately managed.

We concur with the conclusions of the Scoping Report, insofar as they relate to coal mining legacy and potential risks arising.

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely



Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority and/or information that has been published for consultation purposes. The views and conclusions contained in this response may be subject to review

and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided.



Communications, Strategy and Policy Group
Windfarm Policy



Lucy Morgan
Associate Environmental Advisor
The Planning Inspectorate

(By e-mail)

25 May 2026

Application for Development Consent under the Planning Act 2008 for the Ray II Wind Farm

Dear Ms Morgan,

Reference: Ray II Wind Farm - EIA Scoping and Consultation and Regulation 11 Notification dated 7 May 2026

1. Thank you for the opportunity to review and comment on the scoping report for the proposed development at reference. The document discusses the proposed Ray II Wind Farm, located adjacent to the existing operational Ray Wind Farm, approximately 1.2 kilometres (km) northeast of West Woodburn, 3 km south of Elsdon, and 3.2 km northwest of Kirkwhelpington, in Northumberland..
2. The proposed Shepherd's Rig Wind Farm will comprise of up to 20 wind turbines, up to 230 m tip heights ground to tip. This brings the turbines within scope of the Air Navigation Order (ANO) Articles 222 and 225A for obstacle lighting and notification requirements respectively.
3. We have considered the report carefully and have no further comments at this stage.

Yours sincerely,



Andy Wells
Manager Aviation and Wind Turbine Policy



UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0110031
Our Ref: 95100

Ms Karen Wilkinson
Senior Environmental Advisor
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

28 May 2026

Dear Ms Wilkinson

Nationally Significant Infrastructure Project Ray II Wind Farm Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we make the following comments:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of

relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Electromagnetic Fields (EMF)

For potential EMF health impacts from the proposed electrical infrastructure, please refer to the following code of practice, which defines the criteria for demonstrating compliance with the public exposure guidelines, including the operational conditions for scoping out electrical infrastructure:

<https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf>

¹

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

More information is available in the following advice document produced by Public Health England, a UKHSA predecessor body¹.

Yours sincerely

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.