Historic England

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27th October 2026

BY EMAIL ONLY

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Dear Chatteris Windfarm Casework Team

Request for a Formal EIA Scoping Opinion for the Chatteris Windfarm Proposed by Vattenfall Wind Power Limited

Historic England has been notified about a scoping request for the proposed Chatteris Windfarm project by the Planning Inspectorate via an email (dated 01st October 2026).

The Project is for power generation via wind turbines, and the project is informed by an Environmental Impact Assessment Scoping Report (Reference: ERM #0824470 September 2026). The report is accompanied by the Chatteris Wind Farm Commitments Register, and three appendices, the first of which is also in three parts.

Historic England, as the government's lead advisors on the historic environment, would like to offer our comments on this proposal, taking into consideration the information provided by the applicant in the scoping report.

Historic England Advice

Our primary concern in relation to this proposal is the impact of the development upon the significance of designated heritage assets and non-designated heritage assets, both from construction and within the area surrounding the development. Cultural Heritage and Archaeological matters are considered in Chapter 8 (*pp*79) and there are images provided in the appendices

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General matters
Chapter 1.1.2 summarises the scheme to comprise up to 15 wind turbines, a Battery Energy Storage System (BESS), a substation and associated infrastructure, including access tracks, landscaping, habitat management, biodiversity enhancement and amenity works.

It should be noted that all of these elements could directly impact the historic environment and we would recommend that appropriate evaluation measures are used to investigate and understand the potential and significance of the deposits that will be impacted, such as the development of deposit models, geophysical survey and intrusive investigations (boreholes, excavated trenches etc.).

Cultural Heritage and Archaeology

Baseline
Cultural Heritage and Archaeology is considered in Chapter 8 of the Scoping Report. We support the intention of the applicant to scope in heritage matters.

Chapter 8.1.1 mentions that the scoping report has been informed by Desk Based Assessment. We have not been able to view the DBA at this time however we note at 8.3.2 that the applicant concedes that the 'full Historic Environment Record (HER) dataset has not yet been obtained'.

We therefore recommend the desk-based assessment is updated once this data set has been obtained, and a revised document is issued to stakeholders for consideration. This will be a key document in the initial assessment and will need to include the full data set to be up to date and current.

We also recommend the baseline includes as assessment of palaeoenvironmental deposits and considers waterlogged archaeological potential, particularly at depth. The fens are an exceptionally rare environment with unusual burial conditions that can preserved organic material and artefacts. There are also unusual land formation processes that have led to the burial of land surfaces from earlier periods. There is therefore the potential to recover evidence of human activity from within the peat and from land surfaces that became inundated and then preserved under the accumulating peaty soils.

There have also been unparalleled archaeological discoveries in the recent past that including internationally recognised assets such as Flag Fen and Must Farm. We would want to ensure that the application has provided a considered assessment of the likely impacts on this kind of deposit and their archaeological potential.

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Adequate assessment of the burial environment, palaeoenvironmental assessment and deposit modelling should be considered in the baseline assessment and will be needed to inform the ES.

We would be happy to advise the applicant further on appropriate techniques and approaches to assessment the fenland environment, developing deposits models and using information gained from additional sources such as the British Geological Society, as well as maximising information from sharing geotechnical assessment. There are also other data sets available will include archaeological borehole data, particularly relating to quarrying and other large-scale development in this area.

We would also recommend that the impact of the development on groundwater levels is also considered. Changes to groundwater levels may result in impacts upon the local preservation conditions, which in turn could lead to damage and the loss of vulnerable waterlogged archaeological remains that may be present within the development areas. Particularly the scheduled monuments that are within the site boundary. This can include organic items such as wood, leather but also important palaeoenvironmental deposits.

If there is potential for the proposed work to impact groundwater levels, additional work may be required to understand the water environment, the nature and scale of any potential changes and how any impacts could be mitigated. We would therefore recommend that the Historic England document '*Preserving Archaeological Remains*' (2016) is referred to for this issue (https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/).

We recommend that the Historic England document '*Deposit Modelling and Archaeology*' (2020) is also used for guidance: https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/, and that you seek advice from a suitably qualified and experienced geoarchaeologist.

Impact Assessment Methodology
Chapter 8.2.1 also sets out the cultural heritage and archaeology baseline which considers archaeological remains within the Site, non-designated heritage assets within 1 km of the Site, and designated heritage assets within 10 km of the Site.

Given the scale of the turbines and the nature of the fen landscape we would consider this to be broadly appropriate, however the height of the proposed turbines and the nature of the landscape mean the structures are likely to be visible for some considerable distance. The

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extent of the assessment should not therefore be fully fixed and should take into consideration the full extent of the likely visibility as shown in the ZTV (see Appendix A Part 2).

We therefore recommend the applicants be prepared to consider assessing the impacts on heritage assets outside of the 10 km radius where there is clear evidence of visibility or specifically where the significance of an asset would be affected by the proposal. For example, designed views or significant intervisibility of key related assets such as churches, or historic towns with conservation areas.

We are also aware this will likely result in a considerable number of heritage assets (see also chapter 8.3.4) being within scope. We would therefore recommend the applicants undertake a robust assessment of the likely significant effects. We note this is being considered and is set out in Chapter 8.4; however, it would be valuable if this assessment process, the methodology, the results and the outcomes are confirmed and agreed with statutory bodies and the LPA prior to completing the ES.

We would also stress that assessing the potential impact of the development on the significance of heritage assets requires more than the mapping of the location of those assets and identification of those assets on or in proximity to potential sites. The Historic England Advice Note 3 sets out a sequential approach to assessing the impact on significance, and we recommend the applicant consider this advice when developing their methodology.

We also recommend that the applicant also set out how the EIA assessment methodology can be translated into the language of the NPPF to address the balance of harm and benefits in relation to the historic environment as set out in Planning Policy.

Designated Heritage Assets
Chapter 8.3.3 also states that the application boundary also includes two scheduled monuments. It is worth noting that a further scheduled monument sits with 100 m of the boundary and there are two other monuments at c. 1.2 km outside of the development site boundary.

These are all broadly contemporary in terms of period and therefore there are some considerations in relation to this spread of assets that we would recommend the applicant consider. Firstly, that these sites are potentially part of a wider prehistoric landscape that exists within this area of the fens, and therefore that there may be archaeology which survives outside of the designated areas that is related to them in some way.

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Surviving archaeology in these areas may therefore have a relationship to the designated heritage assets and would be of an equivalent value in planning policy terms. Archaeology may also exist on former land surfaces beneath the peat that may not be visible due to the overburden. Finally, we note that these sites may also have or may retain waterlogged archaeology (see also comments above).

Table 8.1 would also be the appropriate place to acknowledge the relationship between designated and non-designated heritage assets and to define the potential for assets of equivalent value.

Table 8.1 would also benefit from including a discussion about palaeoenvironmental remains and the potential for waterlogged archaeology

Chatteris Wind Farm Commitments Register
We note the applicant has also provided three Cultural heritage commitments and consider those measures such as micro siting to avoid specific impacts are broadly appropriate.

The issues with have outlined above in relation to peats, palaeoenvironmental and wet archaeological deposits, and issues of equivalence we feel would need to be reflected in the commitments register. In particular we recommend a commitment is made to understanding the burial environment and ensuring impacts on designated heritage assets within and just to the outside of the site boundary are fully understood and that mitigation is applied where necessary

We do however also consider there are opportunities here to enhance the situation of designated heritage assets within the development area, to better understand these sites and seek to improve their management. We would be looking for a commitment from the applicant to consider what measures could be used to improve the historic environment, to mitigate for loss and to enhance designated heritage assets.

It would have been useful to outline here the sort of mitigation that may be required, such as geophysical surveys, borehole surveys and deposit modelling, Trial Trench evaluation excavations etc. We would also expect to see the Written Schemes of Investigations (WSIs) for any elements of work as they are developed.

LVIA
We note the applicant also intends to produce an LVIA as set out in Chapter 9. It is very clear that the approach set out in this report does not take into consideration views to and from heritage assets and we recommend the LVIA is supplemented with heritage specific viewpoints

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(both photographs and photomontages) that illustrate the ES and support the results of the heritage assessment.

If these are to be presented in the Landscape and Visual chapter, then the assessment needs to be clearly set out and cross referenced with the heritage chapter. Ideally though a separate heritage viewpoints section. We would also recommend that the heritage viewpoints are considered in consultation with statutory stakeholders to ensure these are appropriate.

Enhancements
As noted above we ae aware there are designated heritage assets both within and immediately adjacent to the development site. We consider there would therefore be opportunities here to enhance the situation of designated heritage assets, through improving our understanding of these assets, and through improvements to their management. This would be an enhancement in policy terms. We note the applicant has made a commitment to improving biodiversity, and it would be important to recognise the historic environment can also be improved and enhanced.

There may also be opportunities to improve both biodiversity and heritage through mutually beneficial approaches to site management.

General comments
Overall, we are broadly content with the applicant's approach to sources, baseline information and the assessment of heritages impact. We confirm however that historic environment represents a potentially significant issue in EIA terms and confirm that the historic environment should be ‘scoped in’ to the assessment.

We have however noted concerns about the approach to the designated heritage assets that are within the development area, as well as comment son the impact assessment approach and the commitments register

We note the applicant intends to produce an LVIA. We recommend the LVIA is supplemented with heritage specific viewpoints (both photographs and photomontages) that illustrate the ES and support the results of the heritage assessment.

We would also note that the setting of heritage assets is not however just restricted to visual impacts and other factors should also be considered in assessments; for example, noise, light, traffic. Where relevant, the cultural heritage should also be cross-referenced to other relevant chapters, and as above we advise that all supporting technical heritage information is included as appendices.

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We strongly recommend that the applicant involve the County Councils specialist advisers on archaeological matters and we recognise that they are best placed to provide advice on non-designated heritage assets and to give advice on how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; and of any required mitigation measures. Likewise, the local Conservation Officer will need to be consulted in relation to the built environment.

Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be in an appendix and seen only as material to support a clearly expressed and non-technical narrative argument within the cultural heritage chapter.

The ES should also use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them. Alongside appropriate mitigation to offset adverse effects on heritage assets we are also looking for explicit and demonstrable heritage enhancements and benefits from the scheme to be set out clearly in the application. This could include Interpretation, public engagement in the archaeological discoveries, heritage education and how to include a heritage focus when designing developments and in placemaking.

Given the designated heritage asset within the area, we would welcome further discussions with the applicant in order to refine the approach to the scope of the ES, to the assessment, enhancements and mitigation.

Recommendation

We broadly accept the approach set out in the scoping report, but we have some concerns that would need to be addressed. These are set out above. We consider further refining of the scope and the commitments register would be necessary taking these comments into consideration. This is to fully address heritage matters and to fully consider the impact on the historic environment in relation to policy.

We confirm the historic environment represents a potentially significant issue in EIA terms, and we would support the need for further work to support the publication of an ES.

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

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Historic England

Yours sincerely

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