Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Chatteris Wind Farm

Case Reference: EN0110041

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

09 November 2026

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1. INTRODUCTION

1.0.1 On 29 September 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Vattenfall Wind Power Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Chatteris 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/EN0110041

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 statutory 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 'Pre-application advice for Environmental Impact Assessment'. This provides 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 'Pre-application advice for Environmental Impact Assessment', 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

2.1 Description of the proposed development

ID	Ref	Description	Inspectorate's comments
2.1.1	Paragraph 2.2.28	Temporary construction compounds	The ES should confirm what is meant by reinstatement to 'an appropriate condition'. This should be secured through an appropriate commitment within the draft Development Consent Order (dDCO).
2.1.2	Table 2.1 and paragraphs 2.2.29 to 2.2.31 and 13.5.2	Borrow pits	It is unclear whether the feasibility of on-site borrow pits will be determined by the point of application. If the source of materials is not determined by the point of application, the applicant should ensure that the worst-case scenarios for assessment are presented throughout the ES. This could differ depending on the aspect being assessed. All assumptions should be clearly identified in the ES, for both the import of aggregate and the excavation of on-site aggregate. The ES should confirm the methods of excavation from borrow pits, identify any necessary internal haul routes and detail the post-construction restoration objectives and activities for the borrow pits.
2.1.3	Table 2.1	Temporary construction compounds	The Inspectorate acknowledges that design development is ongoing and that information on the location and size of temporary construction compounds is currently unknown. It expects further certainty to be provided on these matters by the point of application, to enable a robust assessment of effects to be undertaken.
2.1.4	Table 2.1	Watercourse crossings	The locations of trenchless crossings should be identified on a figure within the ES. The ES should also include construction parameters and management measures, details of any groundwater bodies located along the trenchless crossing route(s), and information on any construction compounds for the entry and exit pits. Should trenchless crossing

ID	Ref	Description	Inspectorate's comments
			techniques be relied upon to avoid or minimise impacts on sensitive receptors, the dDCO should secure their use in relevant locations.
2.1.5	Paragraphs 2.2.6, table 18.1 and 11.3.33	Micro-siting	The turbine micro-siting allowance around the turbines is inconsistent across the Scoping Report. Paragraphs 2.2.6 and table 18.1 state it would be 100m, whereas paragraph 11.3.33 states it would be 50m. The Inspectorate notes that NatureScot *Good practice during wind farm construction* guidance identifies a typical allowance of 50m. The micro-siting allowances should be justified, agreed with stakeholders if possible, and the worst-case scenario within these limits of deviation should be assessed. The micro-siting allowance should be clearly defined and consistent within the ES. Figures depicting the micro-siting allowance should also be provided within the ES.
2.1.6	Paragraph 2.2.9	Hardstanding areas	The Scoping Report states that hardstanding areas would be required to facilitate erection cranes and laydown/storage activities. The ES should clarify whether these hardstanding areas would be retained or whether previous land uses would be reinstated post-construction.
2.1.7	Paragraphs 2.2.10 and 16.5.2	Aviation lighting	The Scoping Report states that the final aviation lighting requirements have not yet been determined. All temporary and permanent lighting requirements required for the proposed development should be described in the ES.
2.1.8	Section 2.4	Maintenance activities	The Inspectorate welcomes that details of routine and non-routine maintenance activities will be provided; this should include details of any components with shorter lifespans than the stated operational period, for example battery replacements or upgrades. Should corrective or preventative maintenance activities be anticipated to be of a similar scale to construction phase activities, the ES should include an assessment of likely significant effects. Avoidance and mitigation measures akin to those proposed for the construction phase should be committed to and secured within the dDCO.
2.1.9	n/a	Construction hours	The ES should confirm the core construction working hours. Any requirements for works outside these hours should be identified.

ID	Ref	Description	Inspectorate's comments
2.1.10	n/a	Water supply and disposal	The ES should confirm the anticipated water demand and water source(s) for the construction and operational phases. The applicant's attention is drawn to the comments of Anglian Water and the Environment Agency in this regard which note the region is classified as 'seriously water stressed'. The applicant should utilise best endeavours to avoid and minimise water consumption during all phases of the proposed development. The ES should describe any measures to be implemented to minimise water consumption, and detail how these measures would be secured within the dDCO. It should demonstrate that the supply of water to the proposed development is deliverable and sustainable. Should water be supplied via tanker, these vehicle movements should be taken into account in the traffic and transport assessment and relevant air quality and noise and vibration assessments. The ES should also detail how construction and operational phase wastewater, including foul drainage, would be disposed of.
2.1.11	n/a	Vehicular movements	The Inspectorate acknowledges that anticipated vehicular movements have yet to be determined. It recommends that the project description chapter within the ES identifies the anticipated number and routeing of vehicle movements (including abnormal indivisible loads) and anticipated vehicle types for all phases of the proposed development, including maintenance. This will inform an understanding of the proposed development without the need for cross referencing to relevant aspect chapters.

2.2 EIA Methodology and Scope of Assessment

ID	Ref	Description	Inspectorate's comments
2.2.1	Section 2.3	Grid connection	A grid connection is not proposed as part of the proposed development. Several consultation bodies (including East Cambridgeshire District Council, Cambridgeshire County Council, Natural England and Fenland District Council) have highlighted concerns with this approach, particularly noting that any grid connection route between the proposed development and the proposed substation at Burwell would likely need to cross the Ouse Washes SPA, Wicken Fen SSSI and Fenland SAC. The Inspectorate acknowledges that the Planning Act 2008 allows for onward transmission infrastructure to be consented separately. Nevertheless, it expects the ES to provide an up-to-date position on the anticipated connection route at the point of submission. The ES should explain the relationship between the proposed development and any future connection to the electricity network. The effects of the grid connection corridor cumulatively with the proposed development should be addressed in the cumulative effects assessment at a level that is proportionate to the environmental information that is available and the level of certainty of the grid connection route.
2.2.2	Section 2	Operational activities	The ES should confirm the status of land within the Order Limits where no operational infrastructure would be located. Clarity should be provided whether agricultural use would continue or cease during all phases of the proposed development.
2.2.3	Throughout	Decommissioning	The Scoping Report has, in several instances, proposed to scope out an assessment of decommissioning on the basis that effects are unlikely to be greater than those considered in either the construction or operational assessments. The Inspectorate is generally content with this approach. However, it assumes that in adopting this approach, the applicant is acknowledging that should the ES conclude a significant effect for a given receptor during the construction or operational phase, a significant effect would also occur during decommissioning. This should be explained within the ES to ensure that potentially

ID	Ref	Description	Inspectorate's comments
			significant construction phase effects are not overlooked. Any exceptions to this assumption should be justified. The Inspectorate has highlighted specific matters requested to be scoped out by the applicant in the relevant tables in section 3 of this Opinion.
2.2.4	Paragraphs 5.3.12 to 5.3.17	Mitigation and monitoring	The ES should clearly describe any necessary avoidance, mitigation and compensation measures, together with proportionate monitoring, compliance reporting and adaptive management procedures. In line with NPS EN-3 paragraphs 2.12.46 - 2.12.48, the environmental monitoring framework for the site before and during construction and throughout operation where significant effects may arise, should establish baselines, measurable objectives, responsibilities, methodologies, locations, frequency, and duration. It should be designed to verify the effects predicted in the ES and assess the effectiveness of proposed mitigation and compensation measures. For the proposed development, monitoring should include, but not be limited to, birds and bats, having regard to NPS EN-3, NatureScot's *Bats and onshore wind turbines: survey, assessment and mitigation* (2021), and Natural England and Defra's *Wild birds: surveys and monitoring for onshore wind farms* (2015). Given the complexity and novel scale of NSIP onshore wind development in England, the ES should also consider appropriate opportunities for monitoring and research collaborations to help strengthen the evidence base for future environmental assessments. The above provisions should be agreed, where possible, with relevant stakeholders, and the ES should explain how they would be secured through the dDCO.
2.2.5	Chapters 11 and 15	Soils and agricultural land quality	The soil and peat information is currently presented in the Hydrology, Hydrogeology, Geology and Peat section; whilst the Agricultural Land Classification (ALC) data is currently in the Socio-Economics, Tourism, Recreation and Land Use Chapter. The Inspectorate agrees with Natural England's suggestion (see appendix 2 of this Opinion) that soils, including peat, and ALC are assessed in a single chapter.

ID	Ref	Description	Inspectorate's comments
2.2.6	Section 17.6	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 Impacts and Process', links for which can be found in paragraph 1.0.7 above.
2.2.7	Chapter 19	Structure of the ES and aspect chapters	Although developed within an offshore windfarm context, the Inspectorate advises the applicant to structure the ES in line with Table 1 Annex B of the Evidence Review Note (ERN): Environmental Impact Assessment (OWEKH, 2025) to ensure the EIA process is proportionate and consistent. The Inspectorate also advises the applicant to structure each of the technical aspect chapters within the ES in line with Table 2 Annex B of the same ERN.
2.2.8	Chapter 19	ES non-technical summary	To ensure the EIA process is accessible to a non-technical audience, the Inspectorate advises the applicant to prepare the non-technical summary of the ES in line with Effective Non-Technical Summaries for Environmental Impact Assessment (IEMA, 2023). The non-technical summary should clearly and concisely explain what is proposed, what the

ID	Ref	Description	Inspectorate's comments
			proposed development's environmental impacts are anticipated to be, and how those impacts would be managed.
2.2.9	Throughout	Management plans	The Scoping Report identifies the preparation and implementation of several plans as mitigation, including: • bird protection plan • habitat management and monitoring plan • construction environmental management plan • peat management plan • lighting plan • landscape and ecology management plan • public rights of way management plan • skills and employment strategy • shadow flicker mitigation protocol • battery safety management plan • decommissioning environmental management plan Outlines of plans should be provided where they are relied upon to mitigate significant effects. The ES should provide further detail regarding their scope, objectives and implementation and confirm how they would be secured in the dDCO. To ensure the EIA process is proportionate and front-loaded, the relevant management plans submitted with the application should clearly identify and explain in detail the avoidance, mitigation, and compensation measures that are already known and not dependent on further pre-construction surveys.

ID	Ref	Description	Inspectorate's comments
2.2.10	n/a	Consistency of EIA terminology	To ensure consistency across the EIA process, the Inspectorate advises the applicant to adopt clear and consistent terminology throughout the ES, including in relation to impacts, effects, significance, and timescales. EIA terminology should be aligned across all aspect chapters, while allowing for the use of topic- or sector-specific terminology where this is appropriate and necessary. Where such terminology is used, it should be clearly defined and cross-referenced to the relevant EIA terminology to aid understanding and avoid any conflation or inconsistent interpretation of terms.
2.2.11	n/a	Environmental data-sharing	The ES should clearly describe how all relevant environmental data collected in all phases of the proposed development would be shared with the relevant Local Environmental Records Centre(s) and any other relevant environmental recording schemes. This should be clearly secured within the dDCO.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Biodiversity and Nature Conservation

(Scoping Report Section 6)

Table 3.1-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 6.3	Hazel dormouse and freshwater pearl mussel – construction and decommissioning	The Inspectorate is content that, based on their known distributions, these species are unlikely to be present in the application site; this matter can therefore be scoped out of the ES. These species are not identified in table 6.4 (operational phase). For the avoidance of doubt, the Inspectorate also considers that an assessment of effects on these species during operation can be scoped out.
3.1.2	Table 6.4	Electromagnetic field (EMF) sensitive aquatic species – operation and maintenance	The Scoping Report notes that at watercourse crossings, appropriate installation methods and burial depths would be selected using site-specific information to avoid or minimise exposure of aquatic ecological receptors to EMF. The Inspectorate does not consider that sufficient information has been provided at this stage to rule out the potential for significant effects as the voltage of the proposed cables has not been identified. Where proposed cables are over 132kV, an EMF assessment should be provided in an appendix to the ES. This should include the location, routing and voltages of any cables over 132kV and a risk assessment to any human and ecological sensitive receptors within the Zone of Influence. If the applicant can confirm that the cables would be less than 132kV, the Inspectorate agrees this matter can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.3	Paragraph 17.4.4 and table 17.4	Ancient woodland	The Other Environmental Topics chapter states that effects on Ancient Woodland will be considered in the Biodiversity and Nature Conservation ES chapter. Paragraph 6.3.8 states that the desk study did not identify any areas of Ancient Woodland within 2km of the indicative Order Limits. Subject to confirmation of this being the case for the final draft Order Limits, the Inspectorate considers an assessment of effects on Ancient Woodland can be scoped out from the ES.

Table 3.1-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.1.4	Section 6.1	Introduction	The Inspectorate recommends that for clarity, the introduction section of the ES Biodiversity and Nature Conservation chapter confirms that ornithological receptors (including relevant designated sites) are considered separately within their own chapter.
3.1.5	Paragraphs 6.3.10 and 6.3.11	Invasive non-native species (INNS)	Whilst INNS surveys are proposed, there is no further reference to INNS within the Scoping Report. The ES should report on the survey findings, consider the potential for significant effects to result from their potential disturbance during all phases of the proposed development and identify relevant mitigation measures to manage their spread.
3.1.6	Table 6.3	International statutory designated sites	Table 6.3 notes the potential for 'other indirect effects arising from construction activities' however does not clarify what these would be. These should be defined within the ES.
3.1.7	Table 6.3	Habitat fragmentation	The potential impact pathway of habitat fragmentation has been identified for bats, fish, otter, water vole and other mammals. It has not been considered for the other species proposed to be scoped in (amphibians, badger, invertebrates and reptiles). The ES should assess the effects of habitat fragmentation on all species, where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
			The ES should also identify any temporary and permanent fencing requirements, including the likely height, design, extent, and location. Consideration should be given to potential effects on fauna from new temporary and permanent fencing required as part of the construction, operation and maintenance, and decommissioning phases of the proposed development. An assessment should be provided, where significant effects are likely to occur. In line with NPS EN-3 Paragraph 2.10.75, the Inspectorate also advises that construction and design of any fencing should account for enabling mammal, reptile and other fauna access into the site, where it is appropriate to do so. The ES should detail how this will be secured.
3.1.8	Table 6.3	Invertebrates and reptiles	Whilst invertebrates and reptiles are stated to be currently scoped in, the Scoping Report notes they could be scoped out following baseline habitat surveys and design. The Inspectorate recommends that the applicant seeks to agree scoping out of these matters with relevant statutory bodies and that an evidenced explanation is provided within the ES. The ES should also consider the potential for indirect effects on insectivorous birds and bats resulting from the collision of flying invertebrates with turbine blades, where significant effects are likely to occur. Consideration should be given to monitoring flying invertebrate collision (rate of collision and species most susceptible) with turbines blades to improve current understanding of environmental impacts and to validate assumptions made in the ES.
3.1.9	Table 6.3	Fish	The Scoping Report does not consider the potential for construction noise impacts on fish. Certain noise, such as piling, can cause impacts to fish, such as permanent injury or mortality as well as behavioural impacts. The effects of construction noise should be assessed in the ES, or evidenced justification provided as to why significant effects are not likely.

ID	Ref	Description	Inspectorate's comments
3.1.10	Table 6.3	Disturbance	The assessment of effects from disturbance should consider blasting for the borrow pits, where significant effects are likely.
3.1.11	Table 6.4	Disturbance from new lighting, maintenance and habitat management	For the avoidance of doubt, the Inspectorate considers this impact pathway should also be assessed for bats. The assessment of lighting should consider all phases of the proposed development. It is noted that Ecol-09 of the commitments register states that a lighting strategy will be prepared prior to construction, if required, and that this would set out avoidance and mitigation measures on species such as bats. The basis of 'if required' should be clarified. Any avoidance and mitigation measures should be identified in the ES and secured within the dDCO.
3.1.12	Table 6.4	Bats – operation and maintenance	The Inspectorate notes that collision and barotrauma have been scoped in. However, the Inspectorate also considers that barrier effects arising from avoidance of turbines and associated infrastructure by bats should be scoped in. Operational turbines and associated infrastructure may alter established flight routes, resulting in increased flight distances, energy expenditure, or changes in habitat use.
3.1.13	Table 6.4	Enhancements	Alongside potential onsite habitat enhancements as part of Biodiversity Net Gain, the ES should also consider other biodiversity enhancement measures away from areas of risk such as hibernacula, beetle pyramids, and bat boxes. These should be secured within the dDCO.
3.1.14	Paragraph 6.5.3	Horizontal Directional Drilling (HDD) drilling fluid	The Inspectorate notes that there is potential for HDD to be used where watercourses or sensitive habitats are crossed. Any impacts on the aquatic environment and water resource receptors from mud toxicity and drilling fluid breakout during HDD works which are likely to result in significant effects should be assessed in the ES. The ES should clearly describe any avoidance and mitigation measures relied upon to control and manage the risk of HDD drilling fluid breakout and detail how these measures would be secured within the dDCO.

ID	Ref	Description	Inspectorate's comments
3.1.15	n/a	Hydrological impacts	The ES should assess the implications of hydrological impacts on ecological receptors, where significant effects are likely.
3.1.16	n/a	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. 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.
3.1.17	n/a	Ecological guidelines	The Inspectorate advises the applicant to also consider the following guidelines and best practice advice during data collection and preparation of the ES: • Badger Protection: Best Practice Guidance for Developers, Ecologists and Planners (Badger Trust, 2023) • Chartered Institute of Ecology and Environmental Management (CIEEM): Rebuilding Nature: Good Practice Guidance for Ecological Restoration (2026) • UK Bat Mitigation Guidelines: A Guide to Impact Assessment, Mitigation and Compensation for Developments Affecting Bats (Reason, P.F. and Wray, S., 2025) • Good Planning Practice for Invertebrates: Mitigation (Buglife, 2015)

3.2 Ornithology

(Scoping Report Section 7)

Table 3.2-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Table 7.2	Somersham Lake Local Nature Reserve (LNR): Disturbance and loss of supporting habitat affecting bird species – construction and decommissioning	Table 7.1 notes that Somersham Lake LNR is located 0.8km south of the proposed development and supports breeding, wintering and passage bird species. A 1km buffer is considered for non-breeding surveys (paragraph 7.4.11), therefore it is unclear why the LNR has been scoped out. The Inspectorate does not consider that sufficient evidence has been presented to scope out the potential for significant effects at this stage. The ES should provide an assessment of effects on features of the site, or provide evidence that there is no connectivity between the site and the proposed development. This site is not specifically identified in table 7.3 in respect of the operational phase. For the avoidance of doubt, the Inspectorate also does not consider the operational phase can be scoped out.
3.2.2	Table 7.2	Berry Fen Site of Special Scientific Interest (SSSI): Disturbance and loss of habitat function for notified bird features - construction and decommissioning	Table 7.1 notes that Berry Fen SSSI is located 3km south of the proposed development and is designated for its assemblage of breeding bird species. The Inspectorate agrees that significant effects from disturbance and direct habitat loss at Berry Fen SSSI are not likely and that this site can be scoped out of the ES. However, the Inspectorate has considered the advice of Natural England and East Cambridgeshire District Council (see appendix 2 of this Opinion) and considers there is the potential for species commuting between the SSSI and the Ouse Washes SPA to be affected, or for features from the site utilising FLL to be affected. These matters should be addressed within the ES for all phases of the proposed developments.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.3	Table 7.2	Passerines and near passerines: Damage to active nests, disturbance during breeding season and temporary habitat loss – construction and decommissioning	The Scoping Report seeks to scope out impacts on passerines and near passerines during construction and decommissioning on the basis that these effects would be temporary, reversible and not significant at a population level wider than the site. It is unclear why damage to active nests is proposed to be scoped out for passerines and near passerines, when harm to all breeding birds is scoped in. The Inspectorate does not consider harm to passerines and near passerines can be scoped out and should be included in the assessment, or evidenced justification provided as to why significant effects are not likely.
3.2.4	Table 7.3	Passerines and near passerines: Collision, barrier, displacement, habitat and cumulative effects – operation and maintenance	The Inspectorate is content this matter can be scoped out on the basis that NatureScot 'Recommended bird survey methods to inform impact assessment of onshore windfarms' (2025) guidance states that wind farms are generally not considered to significantly affect passerines.

Table 3.2-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.2.5	Paragraph 7.1.4	Collision risk assessment	The ES should detail how aerial bird density and the proportion of birds flying at risk height has been determined and provide calculations for these elements. The applicant's attention is drawn to the comments of Natural England in this regard (see appendix 2 of this Opinion).
3.2.6	Section 7.3	Data sources	Natural England has advised that the desk study is not adequate to inform a robust assessment (see appendix 2 of this Opinion). The applicant is advised to obtain additional ornithological data through the data sources highlighted by Natural England, Cambridgeshire County Council and East Cambridgeshire District Council, and through

ID	Ref	Description	Inspectorate's comments
			consultation with local wildlife trusts, local ornithological recording groups, and other relevant conservation organisations. This data should be considered in the desk study prior to revisiting the mitigation hierarchy to inform potential avoidance measures.
3.2.7	Section 7.4	Field surveys	The Scoping Report states that the surveys have been designed in accordance with NatureScot guidance for onshore wind farms. Natural England and Defra published standing advice for 'Wild birds: surveys and monitoring for onshore wind farms' in 2015; the ES should demonstrate how this guidance has been followed. The applicant is advised to seek to agree the survey effort with relevant statutory bodies, taking into account input from other relevant experts such as the Royal Society for the Protection of Birds (RSPB), relevant Wildlife Trust, and the Wildfowl and Wetland Trust. Further specific matters regarding survey methodology are detailed below.
3.2.8		Vantage point surveys	Natural England has provided bespoke advice on the number and scope of vantage point surveys in appendix 2 of this Opinion, noting that three vantage points is insufficient (echoed by Cambridgeshire County Council) and raising concerns of their coverage. The applicant is advised to seek to agree the survey effort with relevant statutory bodies or provide evidenced justification within the ES to demonstrate that the distribution and number of surveys is adequate.
3.2.9		Flight activity surveys	The timing of surveys should be detailed within the ES. The applicant should ensure that surveys reflect peak activity periods.
3.2.10		Survey areas	The Scoping Report acknowledges that future survey areas will be expanded upon as a result of updates to the indicative Order Limits. Natural England has advised that two full years of non-breeding (wintering surveys) will be required covering the full 1km buffer and has provided further advice on the survey scope (see appendix 2 of this Opinion). The applicant is strongly advised to undertake such surveys.

ID	Ref	Description	Inspectorate's comments
3.2.11	Tables 7.2 and 7.3	Functionally linked land (FLL)	Tables 7.2 and 7.3 identify the potential for effects on FLL. The ES should confirm the location of such areas, and the population proportion of the relevant qualifying features that such areas support. Any loss and/or disturbance of FLL should be adequately mitigated for and a detailed mitigation package provided for at application stage. The Inspectorate encourages Natural England's invitation to the applicant to discuss the approach to assessing cumulative effects on FLL.
3.2.12	Table 7.3	Collision with operational turbine blades and foundations	Based on recorded flight activity and collision risk modelling, turbine and foundation parameters should be developed to reduce collision risk where a significant risk of collision for birds and/or bats is concluded. This could include altering rotor height, painting turbine blades, and painting turbine foundations. The ES should detail where measures are developed to reduce collision risk and how these will be secured in the dDCO. The applicant should seek to agree mitigation measures or experimental measures to improve current understanding with relevant statutory bodies. Consideration of altering turbine and foundation parameters in relation to collision risk should also be given in the applicant's discussion of alternatives.
3.2.13	Table 7.3	Barrier effects	Fenland District Council has identified the Nene Washes SPA as being located within 20km of the proposed development and notes there is significant movement between that site and the Ouse Washes SPA (see appendix 2 of this Opinion). The ES should consider the impacts of the proposed development on flight routes between designated sites.
3.2.14	Table 7.3	Enhancement	Alongside potential onsite habitat enhancements as part of Biodiversity Net Gain, the ES should also consider other biodiversity enhancement measures away from areas of risk such as bird boxes and raptor perching posts. These should be secured within the dDCO.
3.2.15	Appendix C -	Collision risk modelling	For transparency, the ES should explain how it has been determined that flight activity for a species is at a level where significant effects from collision can or cannot be reasonably ruled out.

ID	Ref	Description	Inspectorate's comments
	paragraph 3.5.2		
3.2.16	n/a	Future baseline	Although addressed for some aspect chapters, the Scoping Report does not consider the future baseline for ornithology. Anglian Water and Fenland District Council have both noted the creation of wetlands from the proposed Fens Reservoir, and Cambridgeshire County Council has highlighted several nature recovery programmes proposed in the region which would likely result in the increased usage of the landscape by bird species (see appendix 2 of this Opinion). The applicant should define the future baseline against which the effects of the proposed development can be assessed.
3.2.17	n/a	Lighting	Lighting is specifically referred to in tables 6.3 and 6.4 of the Biodiversity and Nature Conservation chapter. There is no consideration of lighting in the Ornithology chapter. Any likely significant effects from lighting should be explicitly assessed in the consideration of disturbance impacts.
3.2.18	n/a	Indirect effects on prey species	See ID 3.1.8 above.
3.2.19	n/a	Sensitive environmental information	See ID 3.1.16 above.

3.3 Cultural Heritage and Archaeology

(Scoping Report Section 8)

Table 3.3-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Table 8.1	Buried archaeological remains and designated and non-designated heritage assets: Ground disturbance - decommissioning	The Inspectorate is content that the construction phase assessment would represent a reasonable worst-case scenario for the decommissioning phase. It is therefore content that a separate decommissioning phase assessment is not required. However, the Inspectorate's comments at ID 2.2.3 apply equally here.

Table 3.3-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.3.2	Paragraph 8.3.5	Designated built heritage assets within the site	The Scoping Report states that "No designated built heritage assets are located within the Site that have the potential to experience direct effects arising from the Proposed Development." Paragraph 8.3.3 confirms that two Scheduled Monuments are located within the draft Order Limits. The ES should explain how direct effects to these sites would be avoided.
3.3.3	Table 8.1	Direct physical impacts	The assessment should consider the potential for direct physical impacts from the creation of borrow pits, where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
3.3.4	Table 8.2	Enhancement	The ES should consider enhancement measures for impacted heritage assets such as improved interpretation and active community engagement in the cultural heritage and archaeology of the site. These should be secured within the dDCO.
3.3.5	Section 8.3	Baseline	The applicant should ensure the baseline environment is fully characterised, with details of the burial environment and of palaeo-environmental deposits provided in the ES. The need for deposit modelling should be agreed with relevant statutory bodies
3.3.6	Section 8.4 and Appendix C Section 4.4	Noise impacts to setting	The Scoping Report does not consider the potential impacts of noise to the setting of cultural heritage assets. This should be assessed, or justification provided as to why significant effects are not likely.
3.3.7	n/a	Groundwater levels	The ES should consider the potential for the proposed development to affect groundwater levels and local preservation conditions. Damage to waterlogged archaeological remains should be assessed, or justification provided as to why significant effects are not likely.
3.3.8	n/a	Impacts on setting during construction	The Scoping Report does not consider whether construction activities could temporarily affect the setting of designated and non-designated heritage assets. The ES should provide such an assessment, where significant effects are likely.
3.3.9	n/a	Visualisations	The assessment should be supported by visualisations such as photomontages to help illustrate the likely impacts of the proposed development on heritage assets. The applicant should consult and where possible reach agreement on the number, timing, and viewpoint locations specific to heritage receptors with relevant statutory bodies. Cross reference in the ES should be made to the Landscape and Visual impact assessment to avoid duplication.

3.4 Landscape and Visual

(Scoping Report Section 9)

Table 3.4-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Table 9.2	Non-host landscape character areas (LCAs): Temporary direct effects - construction and operation	This matter is proposed to be scoped out on the basis that construction impacts on wider LCAs are expected to be no worse than that of the operation phase. The Inspectorate considers that the construction phase effects would not necessarily mirror those of the operational phase. For example, there would be temporary construction activities which are acknowledged in respect of visual amenity that could also impact on the local landscape character. The Scoping Report does not identify the location of nearby LCAs relative to the proposed development. As such, the Inspectorate is not in a position to scope this matter out at this stage. The ES should include an assessment of this matter or justification as to why significant effects are not likely.
3.4.2	Paragraph 9.4.3 and table 9.2	Landscape character and visual amenity: Temporary direct effects - decommissioning	For the same reason as noted above in ID 3.4.1, the Inspectorate does not consider decommissioning effects would necessarily mirror those of the operational phase. However, it is content that the construction phase assessment would represent a reasonable worst-case scenario for the decommissioning phase, and that a construction phase assessment has been scoped in. It is therefore content that a separate decommissioning phase is not required. However, the Inspectorate's comments at ID 2.2.3 apply equally here.
3.4.3	Table 9.2	Landscape character and visual amenity: Cumulative effects - construction	The Scoping Report proposes to scope these matters out on the basis that operational cumulative effects represent a reasonable worst-case scenario. Insufficient information has been provided on nearby cumulative schemes and construction activities to rule out significant cumulative effects during construction. As such the Inspectorate is not in a position to scope this matter out. The ES should include an

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			assessment of this matter or the information referred to demonstrating agreement with the relevant statutory bodies and the absence of a likely significant effect.
3.4.4	Table 9.2	Visual amenity: Temporary direct effects - construction	The Scoping Report states that the impact of construction activities on views is unlikely to be worse than operational phase in most cases. However, it does propose to assess "temporary construction activities (e.g. construction compounds, temporary construction access arrangements, active borrow pits and storage areas)" which could "result in a greater effect on specific visual receptors due to the proximity of particular construction activities that are not part if [sic] the operational phase". The Inspectorate assumes that in adopting this approach, the applicant is acknowledging that should the ES conclude a significant effect for a given visual receptor during the operational phase, a significant effect would also occur during construction. This should be explained within the ES to ensure that potentially significant construction phase effects are not overlooked. Any exceptions to this assumption should be evidenced and justified within the ES. The Inspectorate acknowledges the design is still developing which will influence the additional receptors to be affected by the temporary construction activities. The applicant is advised to seek to agree these receptors with relevant statutory bodies and the ES should clearly explain the approach taken.
3.4.5	Table 9.3	Impacts to landscape character beyond the 10 km study area - operation and maintenance	This matter is proposed to be scoped out on the basis that significant impacts are not expected to occur beyond this distance, based on the applicant's professional judgement and experience. The Inspectorate agrees that impacts beyond an agreed study area can be scoped out, however the Inspectorate has commented on the proposed study areas below at ID 3.4.7.
3.4.6	Table 9.3	Impacts to visual receptors beyond	This matter is proposed to be scoped out on the basis that significant impacts are not expected to occur beyond this distance, based on the applicant's professional judgement

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		30 km of the nearest proposed turbine - operation and maintenance	and experience. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.

Table 3.4-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

		Description	Inspectorate's comments
3.4.7	Section 9.2	Study areas	The Scoping Report proposes study areas of 10km for landscape character effects and 30km for visual effects. Section 9.3 of the Scoping Report notes that the site lies within the Fens National Character Area, which is a flat, open landscape offering "offering extensive vistas to level horizons…tree cover is sparse". The Zone of Theoretical Visibility (ZTV) mapping (figures 9.7, 9.8, 9.11, 9.12 and 9.1) show potential visibility beyond the proposed study areas. The Inspectorate therefore considers the proposed study areas to be poorly justified for large structures in an open landscape. Whilst it is acknowledged that greater visibility would be experienced closer to the proposed development, restricting the study areas to the proposed arbitrary distances has the potential to result in the omission of the identification of likely significant effects. The study areas should be informed by the ZTV (and local screening) and the applicant should make efforts to agree the study areas with relevant statutory bodies. The applicant's attention is drawn to the comments of Fenland District Council regarding the proposed study area (see appendix 2 of this Opinion).

		Description	Inspectorate's comments
3.4.8	Paragraph 9.3.2	Viewpoints	The Inspectorate acknowledges that viewpoint locations will be refined. The applicant's attention is drawn to the following comments of consultation bodies (see appendix 2 of this Opinion): • East Cambridgeshire District Council - requesting a viewpoint looking west towards Ely Cathedral with the proposed turbines behind it. • Fenland District Council - requesting a greater number of viewpoints, including some from non-promoted Public Rights of Way (PRoWs). • Historic England – requesting heritage specific viewpoints. • Huntingdonshire District Council – requesting viewpoints further than 10km from the proposed development in its district, and viewpoints from landscape designations. • South Cambridgeshire District Council which proposes Bridleway No. 178/24 could represent an additional viewpoint location. The applicant should seek to agree viewpoints with relevant consultation bodies.
3.4.9	Appendix C Section 5	Landscape receptors	The Inspectorate advises that the assessment should have regard to the Landscape Institutes TGN 02/21: Assessing Landscapes Outside of National Designations when assessing non-designated landscapes. The applicant's attention is drawn to the comments of Huntingdonshire District Council (appendix 2 of this opinion) for further information.
3.4.10	Appendix C, paragraph 5.5.3	Cumulative effects	Any operational wind farms should be captured within the baseline environment, so far as is reasonably practicable.

		Description	Inspectorate's comments
3.4.11	Appendix C, paragraph 5.5.4	Cumulative effects	Paragraph 5.5.4 proposes to "scope out any wind energy developments where turbines are less than 50 m to blade tip height beyond 10 km unless they are in groups of 10 or more". Justifications for such exclusions should be provided within the ES and evidence provided that significant cumulative effects are not likely, for example through the provision of ZTVs.
3.4.12	Appendix C, section 5.8	Aviation lighting assessment	It is unclear why three dusk visualisations are proposed but photographs would be taken from two viewpoints. The applicant should seek to agree the number and locations of viewpoints and photographs required with relevant statutory bodies.
3.4.13	N/A	Figures	The Scoping Report contains a figure depicting National Landscape Character Areas relative to the proposed development. The ES should contain an equivalent figure displaying the local and regional LCAs relative to the proposed development site.

3.5 Shadow Flicker

(Scoping Report Section 10)

Table 3.5-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 10.1	Sensitive receptors, including residential properties, office buildings and tourist accommodation: Shadow flicker – construction and decommissioning	The Inspectorate acknowledges that shadow flicker could result only from the turbines rotating. As such, it agrees that this matter can be scoped out for construction and decommissioning. The temporal scope of the shadow flicker assessment should commence from the start of the turbines rotating, including the commissioning phase(s) of the turbines.

Table 3.5-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.5.2	n/a	Sensitive receptors	The applicant should ensure that all potentially sensitive receptors are included within the assessment. The applicant's attention is drawn to the consultation responses from Huntingdonshire District Council and East Cambridge District Council (appendix 2 of this Opinion) in this regard.

3.6 Hydrology, Hydrogeology, Geology and Peat

(Scoping Report Section 11)

Table 3.6-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Tables 11.1 and 11.2	Public water supply: Changes in volume or water quality – all phases	The Scoping Report states that the site does not drain into a public water supply catchment, although this claim has not been substantiated with appropriate searches. As such, the Inspectorate does not agree the risk to existing water supply abstractions can be scoped out at this stage. This matter should be scoped in, or further information presented to demonstrate appropriate searches have been made to support this conclusion. The Scoping Report does not confirm the water supply source or demand for the proposed development. The ES should detail the water supply strategy for the proposed development (see ID 2.1.10 above). If the applicant can confirm that water would not be obtained from public supplies, the Inspectorate is content that significant effects resulting from the use of public water supplies are not likely and that this matter can be scoped out. In the absence of such confirmation, the ES should assess any likely significant effects from the use of public water supplies. The applicant's attention is drawn to the comments of Anglian Water and the Environment Agency in this regard (see appendix 2 of this Opinion).
3.6.2	Tables 11.1 and 11.2	Peat slide: Ground disturbance – all phases	On the basis of the information provided, including the flat topography of the site, the Inspectorate agrees that significant effects are unlikely from peat slide. However, it notes that baseline surveys are ongoing which could alter this position. It therefore welcomes the applicant's commitment to scoping this matter back in for the construction phase (table 11.1) should further baseline studies indicate the potential for the impact

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			pathway to be present. The Inspectorate recommends the applicant seeks to agree this matter with relevant stakeholders once this information is available. The Inspectorate is however content that peat slide during operation is unlikely to result in significant effects and that this matter can be scoped out of the ES.
3.6.3	Tables 11.1 and 11.2	Unexploded ordnance (UXO): Ground disturbance – all phases	On the basis that UXO risk maps do not identify any areas of moderate or high risk within the study area and noting the proposed risk-management measures during intrusive works, the Inspectorate agrees that significant effects are not likely. This matter can be scoped out of the ES. However, commitments to risk-management measures should be demonstrably secured in a relevant control document.
3.6.4	Tables 11.1 and 11.2	Mines and quarries – all phases	The Scoping Report states that no historic or active mines or quarries have been identified within the site. However, this position is refuted by the Environment Agency which notes the presence of historical and active quarries within and immediately adjacent to the proposed Order Limits (see appendix 2 of this Opinion). The potential for the mobilisation of contaminants and risk of pollution to controlled waters should be assessed within the ES, or further evidenced justification provided as to why such impacts are not likely.
3.6.5	Table 11.2	Groundwater Dependent Terrestrial Ecosystems (GWDTEs): Changes to the groundwater quantity, quality and morphology - operation and maintenance	Table 11.2 (operational phase) states that it is unlikely that GWDTEs are present on site and scopes out this matter. This contrasts with table 11.1 (construction and decommissioning phase) which states that GWDTEs may be present and that further survey work will be undertaken to confirm their presence and potential connectivity. As such, the Inspectorate does not consider the operational phase should be scoped out at this stage. The applicant should confirm the presence and potential connectivity of GWDTEs and seek to agree a scope of assessment with relevant statutory bodies.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.6	Table 11.2	Land contamination: Accidental leaks or spills - operation and maintenance	The Scoping Report proposes to scope this matter out on the basis that suitable mitigation measures would be secured in an Operational Environmental Management Plan (OEMP). The Inspectorate agrees with the Environment Agency (see appendix 2 of this Opinion) that whilst this approach may be acceptable in principle, risks from penetrative works during operation and maintenance cannot be ruled out with further investigation into their likelihood and distribution. The Inspectorate therefore does not agree this matter can be scoped out at this stage. A suitable land contamination risk assessment should be provided to assess likely significant effects and inform relevant mitigation measures.

Table 3.6-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.6.7	Section 11.2	Study area	Paragraph 11.2.1 identifies a 5km study area for hydrological receptors and proposes a study area of land within the Order Limits for contaminated land. Natural England has advised that impact pathways in relation to hydrology, especially water, should not be discounted by distance alone. The Environment Agency has advised a 2km search radius for contaminated land as off-site sources and receptors could be in connectivity with the site. See appendix 2 of this Opinion. The applicant should seek to agree study areas with relevant statutory bodies to ensure that all likely significant effects can be identified and assessed.
3.6.8	Paragraphs 11.3.3 to 11.3.5	Data sources	The soil properties at the site should be described using more detailed soil mapping is available than the SoilScapes broad descriptions. See Natural England's comments in appendix 2 of this Opinion.

ID	Ref	Description	Inspectorate's comments
3.6.9	Paragraph 11.4.1	Effects on water-dependent receptors	Paragraph 11.4.1 identifies the potential for "Effects on water users and water-dependent receptors, including PWS [private water supplies], fisheries and aquatic habitats". These receptors do not appear in tables 11.1 and 11.2. The ES should assess any likely significant effects to these receptors and cross-references should be made to the Biodiversity and Nature Conservation chapter, where relevant.
3.6.10	Table 11.1	Peat, peat soil and peatland - construction	The Inspectorate acknowledges that surveys to date have not identified any peat, but that further work will be undertaken to confirm peat extent, depth and condition. Natural England and the Environment Agency have provided advice on peat surveys (see appendix 2 of this Opinion). The ES should explain how the survey results have informed site layout, restoration and reinstatement. Should peat be confirmed as present, 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. The approach to assessing the sensitivity of peat should consider English policy context and the ecohydrology of lowland peatlands, as advised by the Environment Agency (see appendix 2 of this Opinion). 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 within the dDCO.
3.6.11	Table 11.1	Construction Environmental Management Plan (CEMP)	Table 11.1 states that a CEMP would be implemented "incorporating pollution prevention, emergency response, erosion and sediment control, and drainage management measures to protect watercourse". The draft commitments register does not refer to erosion or sediment control; this should be rectified in the application documents.

ID	Ref	Description	Inspectorate's comments
			Furthermore, the Inspectorate notes that the commitments register contains two entries for a CEMP (Hyd-01 and Hyd-06); it recommends that these are combined to avoid duplication and minimise the risk of inconsistencies.
3.6.12	Tables 11.1 and 11.2	Tidal flood risk	Tables 11.1 and 11.2 state that flood risk will be assessed, however do not confirm the scope of the assessment. The applicant's attention is drawn to the comments of Fenland District Council (see appendix 2 of this Opinion) regarding the importance of such an assessment. The applicant is advised to agree the scope of the assessment with relevant statutory bodies.
3.6.13	Appendix C, section 7.1	Assessment methodology	The Environment Agency has made several comments regarding the sensitivity criteria and impact magnitude criterion proposed in the Scoping Report (see appendix 2 of this Opinion). The applicant is advised to take these comments into account and seek to agree sensitivity criteria with relevant statutory bodies.
3.6.14	n/a	Thermal impacts from buried high-voltage cables	The Scoping Report does not consider potential thermal impacts on groundwater receptors, including GWDTEs and abstractions, from buried high-voltage cables. Similarly, not consideration is given to the potential for thermal emissions to affect peat stability and release peat-bound pollutants to groundwater and surface water. The potential thermal implications of buried cables for groundwater, GWDTEs and peat deposits should be assessed, or justification provided as to why significant effects are not likely.
3.6.15	n/a	Decommissioning	If buried cables are to be retained in-situ, the applicant should demonstrate that they would not pose a significant risk to peat soils or controlled waters via degradation, or damage from future agricultural and other activities.
3.6.16	n/a	Foul water	The potential for impacts to water environment receptors from foul water have not been considered in the Scoping Report. An assessment of effects should be presented in the ES, where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
3.6.17	n/a	Alternatives and the mitigation hierarchy	The applicant's discussion of alternatives should give consideration to the use of peatland in relation to impacts of loss, deterioration and disturbance.
3.6.18	n/a	Trenchless crossing techniques	Paragraph 2.2.22 notes that watercourse crossings may be undertaken using trenchless techniques, for example HDD. The Inspectorate's comments at ID 3.1.14 above apply equally to hydrological, hydrogeological, geological and peat receptors.
3.6.19	n/a	Fire risk	The ES should provide full details of safety systems and design measures to mitigate fire risk. It should also confirm how firewater would be managed to prevent adverse impacts to water resources in the event of a fire. The potential for impacts to watercourses from firewater should be assessed in the ES, or evidenced justification provided as to why significant effects are not likely. The applicant's attention is drawn to the comments of the Environment Agency in this regard (see appendix 2 of this Opinion).
3.6.20	n/a	Nomenclature	The chapter heading in the main Scoping Report includes 'peat'. This is not included within the Commitments Register. The Inspectorate recommends consistent nomenclature be used across documents.

3.7 Climate Change and Greenhouse Gases

(Scoping Report Section 12)

Table 3.7-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Table 12.3	Greenhouse gas (GHG) assessment: Global atmosphere and climate-sensitive receptors (cumulative) – construction and decommissioning	The Scoping Report proposes to scope out a cumulative assessment of GHG emissions for construction and decommissioning on the basis that GHG emissions contribute to global atmospheric concentrations irrespective of source and are therefore inherently cumulative in nature. The Inspectorate is in agreement with this approach and notes that any cumulative climate change effects on the proposed development can be addressed within the Climate Change Risk assessment (CCRA), where relevant. The Scoping Report only refers to this matter for construction and decommissioning. For the avoidance of doubt, the Inspectorate is also content this matter can be scoped out for the operational and maintenance phase.
3.7.2	Table 12.4 and appendix C, paragraph 8.2.8	GHG assessment: Global atmosphere - downstream emissions from the use of generated electricity - operation and maintenance	The Scoping Report proposes to scope out an assessment of downstream emissions from the use of generated electricity on the basis that the electricity generated would not constitute a separate material downstream source of GHG emissions. The Inspectorate agrees that this matter to be scoped out as a separate pathway on the basis that it will be reflected within the net assessment.
3.7.3	Table 12.4	Climate change risk assessment (CCRA): Sea level rise and sea temperature rise	The Inspectorate agrees that significant effects are unlikely to arise from sea temperature rise given the absence of marine components, and notes that any inland flood risk effects influenced by sea level rise would be considered within the Flood Risk Assessment (see also ID 3.6.12 above). On this basis, the Inspectorate is content to scope this matter out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		- operation and maintenance	

Table 3.7-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.7.4	Tables 12.3 and 12.4	Minimising GHG emissions	The applicant should utilise best endeavours to avoid and minimise GHG emissions from energy, material, and fuel consumption during all phases of the proposed development. The ES should describe any measures to be implemented to minimise GHG emissions, and detail how these measures would be secured within the dDCO.
3.7.5	n/a	Peat disturbance in lifecycle GHG assessment	The lifecycle greenhouse gas assessment should specifically consider GHG emissions associated with drying of peat soil, soil carbon losses, agricultural soil emissions and general peat disturbance. Appropriate cross references should be made to the Hydrology, Hydrogeology, Geology and Peat chapter of the ES (See ID 3.6.10 above). The applicant's attention is also drawn to the comments of Cambridgeshire County Council and East Cambridgeshire District Council in this regard (see appendix 2 of this Opinion).

3.8 Traffic and Transport

(Scoping Report Section 13)

Table 3.8-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Table 13.1	Local receptors: Changes in air quality associated with construction traffic	On the basis that this matter will be assessed separately within the Air Quality chapter, the Inspectorate is content this matter can be scoped out of the Traffic and Transport chapter.
3.8.2	Paragraph 13.4.2 and table 13.2	Highway network in the vicinity of the site: Operational, maintenance and monitoring traffic movements	The Scoping Report states that vehicle movements associated with operation would be negligible and limited to activities associated with inspection, monitoring, and general site up-keep. Subject to confirmation that anticipated operational phase vehicle movements (from the project alone and cumulatively with other committed developments) would not exceed the thresholds set out in Institute of Sustainability and Environmental Professionals (2023) Guidelines for the Environmental Assessment of Road Traffic and Movement, the Inspectorate agrees that effects are unlikely to be significant and that this matter can be scoped out of the ES.
3.8.3	Table 13.2	Traffic and transport receptors: Cumulative traffic effects – operation and maintenance	
3.8.4	Table 13.1 and paragraph 13.5.10	Traffic and transport receptors: Effects associated with decommissioning activities	The Inspectorate notes the applicant's position that decommissioning traffic volumes are anticipated to be no greater than, and likely lower than, those associated with construction. It agrees that as future baseline traffic conditions cannot meaningfully be predicted over the operational life of the Proposed Development, a detailed

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			decommissioning traffic assessment is not proportionate and can be scoped out of the ES. However, for transparency, the ES should include a statement to this effect.

Table 3.8-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.8.5	Section 13.2 and figure 13.1	Study area	Figure 3.1 implies that all construction traffic would travel from the east, although paragraph 13.2.3 states that this would be the route for abnormal indivisible load (AIL) deliveries. The ES should confirm the study area for non-AIL deliveries. The links considered to experience material changes in traffic flows should be identified on figures within the ES.
3.8.6	Paragraph 13.3.1	Data sources	The Scoping Report identifies Norfolk and Suffolk highway records as data sources. The proposed development is located in Cambridgeshire and the Inspectorate expects consideration of highway records from the host authority.
3.8.7	Table 13.2	Enhancement	In line with NPS EN-3 paragraph 2.12.27, the ES should consider and maximise opportunities to facilitate enhancements of PRoWs, and detail how this will be secured within the dDCO. Enhancement measures could include improvements to existing PRoWs and creation of new opportunities for the public to access and cross the proposed development site.

3.9 Noise and Vibration

(Scoping Report Section 14)

Table 3.9-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Table 14.3	Residential receptors: Infrasound from wind turbines - operation and maintenance	The Scoping Report proposes to scope this matter out based on Assessment and Rating of Wind Turbine Noise (ARWTN) guidance (2026) which concludes that infrasound from wind turbines would not result in adverse health effects. The Inspectorate agrees that this matter can be scoped out of the ES.
3.9.2	Table 14.3	Residential receptors: Low frequency noise from wind turbines - operation and maintenance	The Scoping Report proposes to scope this matter out based on ARWTN guidance that states noise sensitive receptors would be adequately protected from low frequency noise through the application of the operational noise limits based on A-weighted noise levels. Whilst the Inspectorate notes that paragraph 14.5.5 of the Scoping Report states that operational noise limits cannot be quantified at this stage, it is content that their application will be required and would protect noise sensitive receptors from low frequency noise. Subject to the operational noise limits defined in the ARWTN guidance being applied in the ES, validated by operational noise monitoring, and these being secured through the dDCO, the Inspectorate agrees that this matter can be scoped out.
3.9.3	Table 14.3	Residential receptors: Amplitude modulation - operation and maintenance	The Scoping Report states that amplitude modulation (AM) would be accounted for through character corrections within the operational noise assessment and, on that basis, proposes to scope this matter out. The Inspectorate acknowledges that this methodology is set out in the ARWTN guidance and that appendix C paragraph 10.4.2 of the Scoping Report notes that "appropriate character correction penalties" will be applied in the assessment. Subject to these correction penalties being agreed with relevant statutory bodies, the Inspectorate agrees that a separate assessment of AM is not required.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.4	Table 14.3	Residential receptors: Ground-borne vibration from wind turbines - operation and maintenance	The Scoping Report proposes to scope out this matter on the basis that ARWTN concludes ground-borne vibration from modern upwind wind turbines is significantly below human perception thresholds and does not result in adverse effects on human receptors. The Inspectorate is content this matter can be scoped out.
3.9.5	Table 14.3	Residential receptors: Underground cable noise - operation and maintenance	The Scoping Report proposes to scope out an assessment of noise from underground electrical cables during operation. The Inspectorate agrees that operational noise from underground cables is unlikely to result in significant effects and agrees that this matter can be scoped out of the ES.
3.9.6	Table 14.3	Residential receptors: Traffic noise and vibration - operation and maintenance	On the basis that operational traffic flows are likely to be minimal and limited to periodic site inspections and infrequent maintenance activities, as described in paragraphs 2.4.7 and 13.4.2 of the Scoping Report, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES. However, the ES should clarify the anticipated vehicle types, numbers, and routing during the operational phase, as referred to in ID 3.8.2 above.

Table 3.9-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.9.7	Paragraph 14.3.8	Sensitive receptors	The Scoping Report has only considered residential receptors in Table 14.1. The Inspectorate acknowledges the ARWTN guidance states that noise sensitive receptors will normally comprise residential dwellings only. However, this guidance is for assessing impacts of operational wind turbine noise only. With regards to noise from non-turbine components, impacts on a wider range of noise sensitive receptors should be assessed, where significant effects are likely. For

ID	Ref	Description	Inspectorate's comments
			example, to educational facilities, healthcare facilities, community facilities and recreational areas (including PRoWs). To this regard, the applicant's attention is drawn to the comments of East Cambridgeshire District Council (see appendix 2 of this Opinion) which highlight the need to consider Lake View Bereavement Centre, a nearby public outdoor facility, as a sensitive noise receptor. Impacts on ecological, cultural heritage, and landscape receptors should be addressed in the relevant ES chapters, with cross-reference to the noise modelling undertaken.
3.9.8	Paragraphs 14.2.3 and 14.5.4	Vibration effects – construction	The method of rock extraction from borrow pits has not been detailed in the Scoping Report. The ES should consider the sufficiency of the 100m study area, should methods such as blasting be employed and should peat be present.

3.10 Socio-Economics, Tourism, Recreation and Land Use

(Scoping Report Section 15)

Table 3.10-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Tables 15.1 and 15.2	National labour market and economy: employment and GVA effects – construction, operation and maintenance and decommissioning	The Scoping Report states that direct, indirect and induced employment and GVA effects may be significant at the local level and will be assessed. The Inspectorate agrees that significant effects on the national labour market and national economy are unlikely and is content to scope this matter out.
3.10.2	Table 15.2	Local businesses and economic sectors: demand for goods and services, supply chain activity and expenditure by operational workers - operation and maintenance	The Scoping Report states that operational employment and expenditure are expected to be relatively limited and that wider socio-economic effects are unlikely to be significant. The Inspectorate agrees that this matter can be scoped out of the ES. The ES should, however, clearly set out the anticipated levels of employment during the operation and maintenance phase.
3.10.3	Table 15.2	Local communities: demographic and service demand including housing	The Scoping Report states that operational employment is unlikely to cause significant effects with respect to local demographics, demand for service, housing provision or community identity. The Inspectorate agrees this may be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		provision - operation and maintenance	
3.10.4	Table 15.2	Local communities: access to social infrastructure - operation and maintenance	The Scoping Report explains that there would be no additional direct impacts on access to social infrastructure beyond those established during construction. The Inspectorate is content that a separate assessment of the operational and maintenance phase is not required, however the ES should clearly identify the duration of any such impacts arising during construction.
3.10.5	Table 15.2	Users of PRoW, tourism, recreation assets and social infrastructure- operation and maintenance	The Scoping Report proposes to scope out this matter on the basis that no new or direct effects on PRoW, tourism or recreation resources are expected beyond those established during construction. The Inspectorate notes that any changes to PRoW routes during operation would be considered within the Traffic and Transport assessment, while effects on views and visual amenity experienced by PRoW users during operation would be assessed within the Landscape and Visual assessment. On this basis, and considering that indirect amenity effects on users of PRoW and tourism and recreation receptors are scoped into the assessment, the Inspectorate is content that a separate socio-economics assessment of these matters is not required. The ES should include appropriate cross-references to the findings of the relevant topic assessments.
3.10.6	Table 15.2	Agricultural land and farm holdings: land use, access and agricultural operations - operation and maintenance	The Scoping Report states that no new direct impacts on agricultural land are anticipated during operation. The Inspectorate agrees a separate assessment of the operational and maintenance phase is not required, subject to the assessment of long-term land-use effects arising from the establishment of the proposed development within the construction assessment. The ES should clearly identify the duration of any such impacts arising during construction.

Table 3.10-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.10.7	Section 15.2	Study area - socio-economic impacts such as employment generation, GVA and supply chain effects	The Scoping Report proposes a local study area encompassing the administrative areas of East Cambridgeshire District Council, Fenland District Council and Huntingdonshire District Council. The Inspectorate agrees with Suffolk County Council (see appendix 2 of this Opinion) that this study area is unlikely to reflect the functional labour market and supply-chain geography for the proposed development, particularly noting the number of NSIPs currently under construction, consented or proposed across Suffolk and the wider East of England. The ES should demonstrate that the study areas selected for workforce, skills, education, employment and supply-chain assessment reflect the geographical extent over which impacts may reasonably occur.
3.10.8	Paragraph 15.3.10	ALC surveys	The applicant's attention is drawn to the comments of Natural England (see appendix 2 of this Opinion) regarding the scope of ALC surveys.
3.10.9	Figure 15.3	Provisional ALC mapping	Provisional ALC mapping has been withdrawn and replaced with Predictive ALC map for England. The most up to date mapping should be used in the ES.
3.10.10	Tables 15.1 and 15.2	Workforce demand	The ES should assess whether existing education and training provision has sufficient capacity to support forecast workforce demand and identify any additional interventions required to address identified skills gaps.
3.10.11	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. The applicant should utilise best endeavours to avoid and minimise temporary and permanent loss of BMV land. The ES should clarify whether agricultural use on BMV land will be able to continue during the operation and maintenance phase.

ID	Ref	Description	Inspectorate's comments
			Consideration should be given to the use of BMV land in the applicant's discussion of alternatives. Whilst paragraph 4.3.1 notes that the proposed development has sought to avoid or minimise development on BMV land, the Scoping Report subsequently states that the entirety of the site comprises BMV (paragraph 15.3.10). The ES should therefore clarify how the stated objective of avoiding or minimising development on such land has been applied in practice.

3.11 Aviation, Radar and Telecommunications

(Scoping Report Section 16)

Table 3.11-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Paragraph 16.4.2 and table 16.2	Aviation users and operators: Physical-obstruction - decommissioning	This matter is proposed to be scoped out on the basis that there would be no aviation effects be specific to the decommissioning phase, and as the construction phase assessment would represent the worst-case scenario. The Inspectorate is content that a separate decommissioning phase assessment is not required. However, the Inspectorate's comments at ID 2.2.3 apply equally here.
3.11.2	Tables 16.2 and 16.3	Prohibited, restricted and danger areas and military Practice and Exercise Areas (PEXAs): Effects on the use or operation of restricted airspace – all phases	This matter is proposed to be scoped out on the basis that the proposed development site lies beyond the lateral boundaries of any of these receptors. The Inspectorate notes that the Instrument Flight Procedure (IFP) safeguarding zone for military aerodromes in proximity to the site is scoped into the ES. The Inspectorate agrees that this matter can scoped out of the ES.
3.11.3	Tables 16.2 and 16.3	Met Office weather radar: Effects on meteorological radar operations – all phases	This matter is proposed to be scoped out on the basis that the proposed development site lies outside of the designated 20km safeguarding zone for any Met Office weather radar. The Inspectorate agrees that this matter can be scoped out of the ES.
3.11.4	Table 16.3	Aviation receptors: Cumulative effects -	Cumulative effects on aviation receptors during operation are proposed to be scoped out on the basis that effects on aviation systems and operations would be receptor specific and the acceptability and mitigation of the proposed development would

		operation and maintenance	therefore be determined on a receptor-by-receptors basis. The Inspectorate agrees that cumulative effects on aviation receptors can be scoped out of the ES.

Table 3.11-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.11.5	Table 16.1	Sensitive receptors	The applicant's attention is drawn to the consultation response from NATS En-route Safeguarding (appendix 2 of this opinion) which identifies potentially unacceptable impacts to the Swanwick Air-traffic Control (ATC) centre's radar operations, which is not included within table 16.1 of the Scoping Report. The ES should include consideration of the potential impacts to Swanwick ATCs radar operations.

3.12 Other environmental topics – Human Health

(Scoping Report Section 17.1)

Table 3.12-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Paragraph 17.1.3 and table 17.1	Standalone Human Health assessment	The applicant proposes to scope out a standalone Human Health assessment as potential effects on human health and wellbeing will be considered, where relevant, in other ES aspect chapters. However, in relation to ground and water environment, table 17.1 identifies potential effects on site workers, future site users, private water supply users and nearby communities; these receptors are not identified in tables 11.1 and 11.2 of the Hydrology, Hydrogeology, Geology and Peat chapter. With regards to the remaining receptors detailed in table 7.1 (except Electro Magnetic Fields (EMF) – see ID 3.12.2 below), the Inspectorate acknowledges that assessments are proposed in relevant aspect chapters. However, it is unclear how the effects proposed to be assessed will be translated into an assessment of effects on health or wellbeing, including mental wellbeing and quality of life and the differential impacts on vulnerable populations and existing health inequalities. The Inspectorate considers that a proportionate Human Health assessment chapter, with appropriate cross-referencing, would be the most appropriate means of addressing these matters. 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.
3.12.2	Table 17.1	EMF	Provided the ES can demonstrate that any electrical infrastructure would remain below negligible levels in line with the International Commission Non-Ionising Radiation

			Protection (ICNIRP) guidelines (2020), the Inspectorate is content to scope out the potential for EMF effects on human health from further assessment.

Table 3.12-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.12.3	n/a	n/a	The Inspectorate has no further comments on the proposed scope of assessment.

3.13 Other environmental topics – Air Quality

(Scoping Report Section 17.2)

Table 3.13-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Paragraph 17.2.10	Air quality (combustion, vehicle emissions and dust) - operation and maintenance phase	The Inspectorate acknowledges there would be no combustion processes associated with operation of the proposed development that would require assessing and therefore agrees this matter can be scoped out.
3.13.2			The Scoping Report states that operational traffic would be low in comparison with the construction phase. The ES should confirm the vehicle types and likely number and routing of vehicle movements required for operation of the proposed development. Provided these do not exceed the relevant screening criteria set out in the Institute of Air Quality Management (IAQM) guidelines, the Inspectorate agrees that significant effects on air quality from operational traffic are not likely and that this matter can be scoped out of the ES. If such confirmation is not possible, an assessment should be provided.
3.13.3			The Scoping Report states that operational dust generation would be negligible. Subject to best practice measures being demonstrably secured, the Inspectorate agrees this matter can be scoped out.
3.13.4	Table 17.2	Local human health and ecological receptors within and immediately surrounding the site: Dust and particulate	The Scoping Report proposes to scope out an assessment of dust emissions during the construction phase on the basis that they would be temporary and localised in nature and controlled through good practice measures in accordance with IAQM Guidance on the Assessment of Dust from Demolition and Construction (2024) and secured through the CEMP. The Inspectorate agrees this matter can be scoped out on the basis that the mitigation measures outlined in the commitments register are demonstrably secured.

		matter generated by earthworks, construction activities, vehicle movements and the handling or storage of materials.	
3.13.5	Table 17.2	Dust, particulate matter and vehicle emissions arising from the dismantling and removal of infrastructure	The Scoping Report proposes to scope out this matter on the basis that effects during the decommissioning phase would be similar to those during the construction phase and mitigation would be managed via the implementation of a Decommissioning Environmental Management Plan (DEMP). The Inspectorate agrees that a separate assessment is not required. However, the Inspectorate's comments at ID 2.2.3 apply equally here.

Table 3.13-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.13.6	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.

3.14 Other environmental topics – Major Accidents and Disasters

(Scoping Report Section 17.3)

Table 3.14-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Table 17.3	Soils, peat, surface water, groundwater and ecological receptors, people: Accidental leakage or spillage of oils, fuels, chemicals or waste - construction, operation or decommissioning	Table 17.3 concludes that there is no potential for significant impacts and notes that relevant pollution pathways will be considered in the Hydrology, Hydrogeology, Geology and Peat chapter of the ES. The Inspectorate notes that table 11.1 scopes in accidental pollution for construction and decommissioning phase, acknowledging the potential for a significant impact. Despite this discrepancy, the Inspectorate does not consider that a duplicate assessment is required in the Other Environmental Topics chapter.
3.14.2	Paragraph 17.3.7 and table 17.3	People and environmental receptors: Battery fault resulting in fire or thermal runaway - operation	The Scoping Report acknowledges the potential for fire or thermal runaway from the battery energy storage system (BESS). The Inspectorate acknowledges that hazards can be reduced through appropriate siting, system design, thermal management, monitoring, fire detection and suppression, spatial separation, and emergency response arrangements. These measures should be secured through a Battery Safety Management Plan. However, the location of the BESS is not yet determined. The Inspectorate has had regard to the advice of UK Health and Security Agency (UKHSA) (see appendix 2 of this Opinion) and considers that there is currently insufficient information to determine that there would be no significant effects to any residential or other sensitive receptors off-site. In addition, East Cambridgeshire District Council (see appendix 2 of this Opinion) has noted the high flammability of peat and proximity to agricultural crops through which fire could spread.

			The ES should provide an assessment of effects from a fire incident involving the BESS, including potential public health risks from any plume and water run-off, or further evidence to demonstrate that significant effects are not likely. Consideration should also be given to the potential for fire risk from additional sources such as a failed turbine or electrical transmission structures. The Inspectorate advises the applicant seeks to agree emergency response arrangements with relevant fire and rescue authorities once further information is available.
3.14.3	Paragraph 17.3.8 and table 17.3	People and environmental receptors: Structural or mechanical failure of a wind turbine during extreme wind conditions	The Scoping Report states that turbines would cease operating when defined wind-speed thresholds are exceeded and considers the likelihood of failure to be very low with standard design and operational controls. The Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
3.14.4	Table 17.3	Proposed development infrastructure and downstream environmental receptors: Flooding - construction, operation and maintenance or decommissioning	Table 17.3 concludes that there is no potential for significant impact. The Inspectorate notes that tables 11.1 and 11.2 of the Hydrology, Hydrogeology, Geology and Peat chapter scope in flood risk for construction, operation and decommissioning acknowledging the potential for a significant impact. Despite this discrepancy, the Inspectorate does not consider that a duplicate assessment is required in the Other Environmental Topics chapter.
3.14.5	Table 17.3	People, habitats, soils and proposed development infrastructure: Increased heat and dry conditions could contribute to wildfire or increase the likelihood and	The Inspectorate is content that the potential for heat and dry conditions to contribute to wildfire which could affect the proposed development will be assessed within the Climate Change and GHG ES chapter (as noted in table 12.4 of the Scoping Report). The Inspectorate does not consider that a duplicate assessment is required in the Other Environmental Topics chapter.

		consequences of a fire – construction and operation	
3.14.6	Table 17.3	People, proposed development infrastructure and environmental receptors: Hurricanes, tornadoes or volcanic activity	The Inspectorate agrees that these hazards are not characteristic of the site and that this matter can be scoped out of the ES.
3.14.7	Table 17.3	People, proposed development infrastructure and environmental receptors: Unforeseen natural disaster	The Scoping Report states that available evidence indicates other natural disasters are unlikely at the site. The Inspectorate agrees that this matter can be scoped out of the ES.
3.14.8	Table 17.3	Workforce; nearby residents, workers and recreational users: General occupational or public safety incidents - construction, operation or decommissioning	The Inspectorate agrees with the applicant's position that these matters principally relate to occupational and public health and safety rather than environmental effects and would be managed through applicable legislation, detailed design and established industry good practice. This matter can be scoped out of the ES; however, relevant control documents should detail any necessary avoidance and mitigation measures.

Table 3.14-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.14.9	n/a	n/a	The Inspectorate has no further comments on the proposed scope of assessment.

3.15 Other environmental topics – Forestry

(Scoping Report Section 17.4)

Table 3.15-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Paragraph 17.4.4 and table 17.4	Ancient woodland – all phases	See ID 3.1.3 above. Subject to confirmation of this being the case for the final draft Order Limits, the Inspectorate considers an assessment of effects on Ancient Woodland can be scoped out from the ES.
3.15.2	Table 17.4	Operational forestry effects	The Inspectorate agrees this matter can be scoped out as no ongoing forestry impacts are anticipated beyond the permanent loss of woodland (assessed during the construction phase). The construction phase assessment should clearly assess this as a permanent impact.
3.15.3	Table 17.4	Decommissioning forestry effects	The Inspectorate is content that decommissioning effects would be temporary and of a similar or lesser magnitude than construction effects and that this matter can be scoped out of the ES.

Table 3.15-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.15.4	n/a	n/a	The Inspectorate has no further comments on the proposed scope of assessment.

3.16 Other environmental topics – Waste

(Scoping Report Section 17.5)

Table 3.16-a: The Inspectorate's comments on matters the applicant proposes to scope out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Table 17.5	Standalone waste chapter	The Scoping Report states that a separate waste chapter for the ES has been scoped out as no likely significant effects are predicted during all phases of the proposed development. The Inspectorate agrees that a standalone chapter on waste is not required within the ES. However, the project description should identify the potential waste streams of construction, operation and decommissioning, and include estimated volumes, by type and quantity, of expected residues and emissions and quantities and types of waste produced. If off-site disposal is required, an assessment of likely significant effects including cumulative effects should be included within the ES. The applicant should utilise best endeavours to minimise waste. The ES should describe any measures to be implemented to minimise waste, detail how these measures would be secured within the dDCO and demonstrate how the waste hierarchy will be applied.

Table 3.16-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.16.2	Paragraph 17.5.13	Site waste management plan (SWMP)	The Scoping Report states that a SWMP would form part of the CEMP. The Inspectorate recommends this is made clear within the Commitments Register, which does not currently refer to such a plan (Oth-02).

3.17 Cumulative effects

(Scoping Report Section 18)

Table 3.17-a: The Inspectorate's comments on matters the applicant proposes to scope out

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.

Table 3.17-b: The Inspectorate's other comments on the applicant's proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.17.2	Section 2.3	Grid connection	The Scoping Report states that "The ES will set out the approach taken to the grid connection, including how the relationship between the Proposed Development and any future connection to the electricity network has been considered for EIA purposes, and the extent to which any likely significant effects associated with that connection can be assessed on the basis of available information at the relevant time." For the avoidance of doubt, the ES should assess any likely significant cumulative effects resulting from the proposed development, the grid connection corridor and any other identified plans or project, based on the information available. See ID 2.2.2 of this Opinion.
3.17.3	Section 18.3	Developments for consideration	Figures 18.1a to 18.1c present the locations of the preliminary cumulative development long list identified. It would be helpful for project names to be included on the figures to enable easy identification, particularly for NSIPs. The applicant's attention is drawn to the comments Anglian Water, Cambridgeshire County Council, East Cambridgeshire District Council, Huntingdonshire District Council, Natural England, Norfolk County Council, South Cambridgeshire District Council, Suffolk County Council and Sutton and Mepal Internal Drainage Board (see appendix 2 of this Opinion) which identify projects for inclusion within the cumulative effects assessment.

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	Chatteris Town Council
	Doddington Parish Council
	Manea Parish Council
	Wimblington and Stonea Parish Council
	Christchurch Parish Council
	Over Parish Council
	Willingham Parish Council
	Haddenham Parish Council
	Sutton Parish Council
	Little Downham Parish Council
	Mepal Parish Council
	Witcham Parish Council
	Wentworth Parish Council
	Coveney Parish Council
	Somersham Parish Council
	Warboys Parish Council
	Bluntisham Parish Council
	Pidley-cum-Fenton Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Colne Parish Council
	Earith Parish Council
	Woodhurst Parish Council
	Welney Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission - East & East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	Warboys Somersham and Pidley Internal Drainage Board
	Nightlayers Internal Drainage Board
	Hundred Foot Washes Internal Drainage Board
	Sutton and Mepal Internal Drainage Board
	Haddenham Level Drainage Commissioners
	Middle Level Commissioners Internal Drainage Board
The relevant Highways Authority	Cambridgeshire County Council
	National Highways
The Civil Aviation Authority	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

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 police authority	Police and Crime Commissioner for Cambridgeshire and Peterborough
The relevant ambulance service	East of England Ambulance Service - NHS Trust
The relevant fire and rescue authority	Cambridgeshire Fire and Rescue Service
The relevant Integrated Care Board	NHS Central East Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	Middle Level Navigation
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Cambridge Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	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	E.ON UK Network Assets Ltd
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited
	Eclipse Power Network Limited

STATUTORY UNDERTAKER	ORGANISATION
	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
	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)

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 56A OF THE PA2008

LOCAL AUTHORITY
South Holland District Council
Fenland District Council
South Cambridgeshire District Council
East Cambridgeshire District Council
Huntingdonshire District Council
King's Lynn and West Norfolk Borough Council
West Suffolk Council
Bedford Borough Council
Central Bedfordshire Council
Peterborough City Council
North Northamptonshire Council
Cambridgeshire County Council
Norfolk County Council
Lincolnshire County Council
Essex County Council
Hertfordshire County Council
Suffolk County

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Cambridgeshire and Peterborough Combined Authority

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Bedford Borough Council
Cadent Gas Limited
Cambridgeshire County Council
Central Bedfordshire Council
Chatteris Town Council
East Cambridgeshire District Council
Environment Agency
Fenland District Council
Forestry Commission - East & East Midlands
Fulcrum Pipelines Limited
Greater Cambridge Share Planning (a strategic partnership between Cambridge City and South Cambridgeshire District Councils)[1]
Haddenham Parish Council
Health and Safety Executive
Huntingdonshire District Council
Ministry of Defence
National Gas
National Grid Electricity Transmission Plc
National Highways
NATS En-Route Safeguarding
Natural England

[1] Note that only South Cambridgeshire District Council was formally consulted as a local authority defined in section 56A of the PA2008.

Network Rail Infrastructure Ltd
Norfolk County Council
North Northamptonshire Council
Peterborough City Council
South Cambridgeshire District Council
Sphere Energy Connect Ltd
Suffolk County Council
Sutton and Mepal Internal Drainage Board
United Kingdom Health Security Agency
West Suffolk County Council
Witcham Parish Council

Anglian Water Services
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk
strategicgrowth@anglianwater.co.uk

PINS Reference: EN0110041

Our ref: Chatteris Wind Farm/Scoping Response

FAO: [redacted] – Senior Environmental Advisor
By email: ChatterisWindFarm@planninginspectorate.gov.uk

27th October 2026

Dear [redacted],

CHATTERIS WIND FARM – SCOPING CONSULTATION – ANGLIAN WATER RESPONSE

Thank you for the opportunity to comment on the scoping consultation for the Chatteris Wind Farm Project.

Anglian Water understands the indicative design parameters are shown on Figures 2.1 (Site location) and 2.2 (Site Layout) which runs through the local authority areas of Cambridgeshire. Anglian Water Services (AWS) is the statutory water and sewerage undertaker for the proposed project area, and this response is in our statutory capacity regarding water resources, water supply network, water recycling centres (WRCs), water recycling assets, planned assets and the sewer network, as well as the related role of surface drainage.

AWS works to support the construction and operation of nationally significant infrastructure projects (NSIPs) that are conducted in accordance with the Water Industry Act 1991. In view of the guidance in the National Policy Statements E.g. Overarching National Policy Statement for Energy (EN-1) (December 2025) and 2024 IAQM guidance15. AWS would expect the following points are assessed in the Environmental Impact Assessment (EIA) to set out how the project will be supplied with water and its wastewater managed; how water recycling and supply assets serving residents and business in the area will be protected; and how design has been altered to reduce the need for new infrastructure or the diversion of existing assets. This is relevant for the construction, operation, and de-commissioning stages (as applicable).

AWS will work with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, and wastewater infrastructure are planned to be undertaken with the minimum of disruption to the project and customers. We would encourage on-going engagement to ensure that AWS and the developer have reached agreement on the approach to assets and connections in advance of the submission of the draft Development Consent Order (DCO) for examination.

The Project and Anglian Water Infrastructure

It is understood; the proposed development includes the construction, operation and decommissioning of up to 15 wind turbines, together with an on-site Battery Energy Storage System (BESS), an on-site substation and associated infrastructure, including access tracks, landscaping, habitat management, biodiversity

enhancement and amenity works. For the purposes of the scoping report, the candidate turbine model has been assumed by the applicant to have a maximum hub height of up to 134 m, maximum tip height of up to 220 m and a maximum rotor diameter of up to 172 m.

AWS supports the need for an Environmental Impact Assessment (EIA) to ensure a clear understanding of assumptions and cumulative construction impacts to represent a 'worst case' scenario, so that the assessment of likely significant effects is robust.

It is acknowledged that due to the early stages of design and development of the project the nature of infrastructure and construction methods are unable to be confirmed. This is to allow for the consideration of ongoing engineering development, changes arising from environmental surveys and assessment and engagement feedback for input into the final design.

AWS notes that the scoping report identifies that there will be instances whereby the project interacts with existing or proposed large scale projects along the route corridor. However, it lacks reference to the consideration of the existing utility infrastructure. AWS would therefore expect the next stages of the project (including the EIA) to include reference to any existing infrastructure managed and owned by AWS, and any provision of replacement infrastructure or requirements for new infrastructure.

AWS' own programme of projects for AMP8 (2025-30) should be included with the list of cumulative projects to be assessed in the EIA. Our Business Plan Our Plan 2025 to 2030 - PR24 references record investment and obligation during this next AMP period (2025-30) and through an ambitious Water Industry National Environment Programme (WINEP) as agreed with the Environment Agency as the environmental regulator.

This letter will firstly address the aspects of the project which may interrelate with the Fens Reservoir including associated infrastructure. The response will then address standard matters which Anglian Water would comment on as the appointed water and sewerage undertaker.

Fens Reservoir

Anglian Water and Cambridge Water are currently developing proposals for a new reservoir in the Fens. The Fens Reservoir is a project of national significance for the provision of new water resources and will be determined under the Planning Act 2008 through a Development Consent Order (DCO) application. The project will provide additional water supply for Anglian Water and Cambridge Water customers and is being progressed through the formal regulatory process established by the Regulators' Alliance for Progressing Infrastructure Development (RAPID).

The need for the Fens Reservoir was established through Anglian Water's Water Resources Management Plan 2020–2045 (WRMP19) and has subsequently been taken forward in its most recent Water Resources Management Plan 2025–2050 (WRMP24), and in Cambridge Water's final Water Resources Management Plan, together with other interim strategic supply options.

The proposed Fens Reservoir will be located north of Chatteris and east of Doddington and Wimblington. It will capture surplus water during periods of availability for storage and subsequently distribute this to meet customer demand. The Fens Reservoir will not only help to meet the region's water supply needs for the future, but it will also provide opportunities for recreation and leisure, creating a place where people, nature and water come together. In addition to a new reservoir, our Project includes associated water infrastructure which will allow us to abstract water and transfer it the reservoir, treat the water to drinking water standards, and transfer it into supply for Anglian Water and Cambridge Water customers.

Further details of our current proposals can be found on our website at A proposed new reservoir in the Cambridgeshire Fens - Anglian Water - Fens Reservoir including materials from our Third Phase of consultation which took place between 15 October and 10 December 2025. Iterative design development remains ongoing in line with the DCO process and our Project boundaries will be updated as we move towards DCO submission.

Anglian Water proposes to submit its Development Consent Order application in Autumn 2028. Subject to this being granted, works on site would commence in 2030 with water being brought into supply in 2036 at the earliest.

The proposed Chatteris wind farm would be located approximately 500 metres from the Fens Reservoir indicative project boundary at the nearest point.

Given the strategic significance of the Fen Reservoir project, Anglian Water would welcome early engagement with Vattenfall Wind Power Limited to discuss their development proposals and the potential interfaces between the two Projects to ensure the construction, operation and maintenance of the proposed Fens Reservoir would not be prejudiced.

Potential Impacts

Anglian Water notes that the EIA Scoping Report, prepared by ERM dated September 2026 does not include any reference to the Fens Reservoir within the preliminary cumulative development long list identified using the search criteria shown within Figures 18.b and 18.c of the Scoping Report. The document indicates that the cumulative development longlist will remain under review during the EIA process and we would ask that the Fens Reservoir is added to this list now to ensure that the relevant assessments are undertaken, particularly given the potential for the Fens Reservoir to change the baseline parameters or assumptions of certain assessments. There is also the potential for a range of cumulative impacts particularly during the construction phase if there is an overlap between the two Projects. In particular we would draw attention to the following matters; -

- Ecological and HRA Impacts

The proposed Fen Reservoir project will transform the local landscape around Chatteris, Wimblington and Doddington, creating a large new area of open water which currently does not exist. Extensive new areas of wetland creation are also proposed around the reservoir and to the south of the Forty-Foot Drain. These new areas of water and wetland will attract a range of wildlife including birds to the local area, changing existing recorded flight patterns compared to the baseline data which has reviewed and been collected to date. There is the potential for the windfarm to result in increased mortality of raptors and waterfowl due to increased collision risk mortality. This should be a consideration in the cumulative assessment in the ecological assessment and Habitat Regulations Assessment.

The proposed windfarm is located within Functionally Linked Land (FLL) used by SPA and Ramsar citation features. The proposed Chatteris and Redmere wind farms could reduce the amount of FLL available for qualifying features. If the construction of Fens reservoir and the windfarms overlapped there is the potential for cumulative disturbance impact. Some permanent loss of FLL associated with the Fens Reservoir is also likely. The extent of this will be determined as our design matures and through the EIA and HRA processes.

Consideration should be given to potential in combination effects on riparian mammals which may be impacted during construction if the two schemes progress at the same time. There may also be in combination effects for the wider otter and water vole populations at catchment level. Impacts upon available land for mitigation are also possible and should be considered.

- Heritage

The Fenland Basin has high potential for paleoenvironmental remains to survive. There is the potential for cumulative impacts if heritage assets extend into areas affected by both Projects including impacts associated with peat management and dewatering during construction. There may also be cumulative impacts upon the setting of heritage assets given the nature of the landscape.

Archaeological investigations and mitigation undertaken for the wind farm may provide useful information on archaeological survival, preservation conditions and mitigation approaches that could benefit the reservoir programme.

- Landscape and Visual Impacts

Both the Chatteris and Redmere wind farms will have a visual impact, given the open and expansive nature of the Fenland landscape and could contribute to cumulative effects on the landscape setting. They may also impact the visitor experience associated with the Fens reservoir, particularly on views from the embankments.

- Impact upon Agricultural land

The Fens Reservoir would result in the loss of agricultural land to the north of Chatteris. Anglian Water considers that this should be taken into consideration in the baseline for the cumulative impact assessment for Chatteris wind farm for both the construction and operational phases.

- Construction Impacts

Depending upon construction periods there is the potential for a range of impacts including; -

  - Cumulative traffic impacts on the A142 corridor;
  - Cumulative impacts upon impacts upon Public Rights of Way;
  - Potential impacts on Fens Reservoir construction traffic routing depending upon the location of cable routes and the timing of cable laying works;
  - Possible additional pressures upon construction resources including the availability of construction workers, supply chains including the supply of construction materials (aggregates, concrete etc) and regional waste management capacity;
  - Impacts upon the local communities from additional construction workers in the area;
  - Potential for cumulative impacts including on air quality, from noise, dust, and visual impacts during construction
  - On water quality if there are hydrological connections between ditches and channel within the wind farm site and Ouses Washes, reservoir abstraction, and wetland habitats.
  -

Summary

In summary given the national and regional importance of the Fens Reservoir, Anglian Water would welcome early and continued engagement with Vattenfall to ensure that the design, assessment and delivery of the wind farm does not prejudice the future construction, operation or maintenance of this strategically significant water resource project. Anglian Water looks forward to working collaboratively with Vattenfall as both projects progress through their respective consenting processes.

General Comments

There are existing AWS assets both above and below ground, which serve the surrounding businesses and communities. There are several water mains and sewers within the project area within the highway or its verges which link to these various settlements.

To reduce the need for diversions and the associated carbon impacts of those works, AWS's assets should be identified and mapped to establish interactions with the project with a view to designing the project to avoid impacts upon those assets. Where the project is likely to have a number of interfaces with our assets, we advise applicants to contact AWS to discuss provision of further technical/design assessments for clash detection, identification of potential diversions, and asset protection measures. AWS requires that the location and nature of our assets serving local communities have been identified and protected, during construction and operation of the project. This will help to ensure that the proposed order limits are suitable to accommodate such works and help de-risk the delivery programme for the project if any specific issues are identified at an early stage.

We recommend that the locations of our assets are initially identified from a desktop study of http://www.digdat.co.uk/ to establish the extent of our assets within the scheme's application boundary. These should be mapped to establish interfaces with assets and the scheme designed to avoid impacts upon those assets.

For land investigation questionnaires relating to Anglian Water's above ground assets and formal easements, you should contact our estates team on: awsestates@savills.com.

In addition, we strongly recommend that clash detection and asset assessment be undertaken by ourselves as early as possible and before the design fix. This ensures clarity, reduces risk, and supports the timely and efficient delivery of the project. We would not agree that a review of utilities plans is used to inform plans for proposed works prior to construction. Given the large number of NSIPs and other AWS projects being delivered in AMP8, there is a strong advantage to having upfront discussions with AWS in relation to our asset interfaces with the project.

Our National Infrastructure team is responsible for identifying AWS assets in relation to the DCO process. Early engagement is critical to ensure accurate assets data is captured and to avoid potential delays later in the project's lifecycle. Sharing data at an early stage enables timely clash detection and coordination. To support efficient assessment and integration into our systems, it would be helpful if any revised boundary/mapping is provided in Shapefile format so that we are able to update our records.

Engagement with us on the asset interfaces of the project can include:
- Clash detection and resolution.
- Early design and technical assurance.
- Asset protection and diversion planning.
- Coordination with Anglian Water investment schemes (current and planned).
- Review of red line boundary implications.

You will be assigned a single point of contact (myself) who will coordinate engagement across relevant teams, including the National Infrastructure Team. Discussions with AWS around project scope, timescales, and other key details will ensure that tailored, project-specific advice can be provided to help de-risk the delivery programme as the Project comes forward. Whilst, costs would be incurred to support project development and internal planning, this can be discussed further with the Applicant. This would provide a high-level desktop assessment of each interface between the project and AWS assets or projects, and will be dependent on project size, complexity, and requirement from the project. Typically, this includes input from both AWS Services and our delivery teams.

This process will also help to inform mitigation measures in the Construction Best Practice for underground pipelines, as well as any other environmental and traffic management plans. AWS will need to be a consultee set out in the Requirements of the DCO for the approval of these detailed management plans.

The project should seek to assess whether there are any diversion requirements, the appropriate method of cable installation (For Example; Open Cut or Trenchless), and suitable mitigation of thermal dispersion and contamination impacts from the construction and operation of underground cabling, particularly around Source Protection Zones.

AWS considers that where there are interfaces between the project and AWS assets, a AWS's bespoke Protective Provisions Agreement will be required and included within the draft DCO. As a starting point, AWS requires that the following standoff distances are applied for working each side of the medial line of AWS pipes where construction works are undertaken. This information is extracted from our Protective Provisions template - copy attached.

(a) 4 metres where the diameter of the pipe is less than 250 millimetres.
(b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
(c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

Ground Conditions, Land Contaminations and Source Protection Zones

AWS have noted a significant number of surface water receptors within the proposed order limits including field drainage channels associated with the Counter Drain as part of the Internal Drainage Board (IDB) maintained watercourses and ditches of Sutton & Mepal IDB's. Chapter 11 of the scoping report identifies the Likely Significant Effects (LSE) on the Hydrology and Hydrogeology receptors relevant to the proposed development. These include artificial field drainage channels Crooked Drain, Hammond's Eau associated with the wider managed drainage network (Chapter 11, Paragraph 11.3.14).

The chapter assesses the potential for significant effects of ground conditions, land contamination and source protection zones arising from the construction, operation, maintenance, and decommissioning phases of the project, with particular consideration given to changes to surface water or groundwater; alteration of drainage patterns; changes to the recharge and flow of shallow groundwater systems; changes to flood risk at watercourse crossings and downstream; and disturbance of contaminated soils with a potential to effect water quality.

The report separates the likely significant effects into two assessment tables (11.1 Construction and Decommission and 11.2 Operation and Maintenance). The tables address contamination in terms of construction, operation and decommissioning activities on hydrogeology and identifies the most significant effects in terms of contamination are likely to arise during the construction phase.

AWS does not operate any groundwater abstraction points within the study area and AWS acknowledges that the scoping report (table 11.1) identifies the site does not drain into a public water supply catchment. There are no groundwater Source Protection Zones (SPZs), which are designated to safeguard public groundwater supply abstractions. Notwithstanding the above Anglian Water welcomes the proposal of mitigation measures drainage management, pollution-prevention measures, and implementation of Sustainable Drainage Systems (SuDS) to reduce any remaining risk. Anglian Water supports that the remaining areas identified in table 11.1 and 11.2 are scoped in for further assessment.

It is understood from the Draft Commitments Register and Appendix C, accompanying the EIA scoping report that several mitigation related commitments are proposed, which the project team intends to secure through requirements in the final DCO or via relevant management plans. Accordingly, AWS would request they be included as a consultee within the DCO Requirements for the approval of detailed management plans covering these matters.

AWS would expect that potential impacts and associated mitigation measures are clearly identified and implemented through the Construction Environmental Management Plan (CEMP) to ensure that AWS assets are not adversely affected in terms of quality, quantity, or structural integrity. This should include measures to address risks from fuel, chemical, and material storage, as well as the mobilisation of any existing ground contamination. AWS will also seek assurance that appropriate controls are in place to reduce the risk of contamination that could affect public water supply abstractions and to minimise the risk of damage to water supply and sewerage assets, which could in turn present pollution risks to the local environment.

Any proposed dewatering activities should be addressed through the Environment Agency's National Permitting Service, in terms of granting licenses, while ensuring sufficiency of groundwater resources for abstractors and the environment.

Water Management

AWS seeks clarification on the following matters:

- If water recycling/ sewerage services are required from AWS (all stages).
- If a water supply is required (all stages).
- Whether the management of surface water will require a public sewer connection.

AWS requests that these points are fully assessed and confirmed in the EIA. Further advice is provided below.

Water recycling/ sewerage services

As part of the overall drainage strategy for the project, details of how wastewater is intended to be disposed of and how this will be managed, such as a connection to an available public sewer will need to be confirmed all project stages within the EIA. If required, options may include connecting to the nearest available public sewer or a self-contained independent non-mains domestic storage and/or treatment system. The situation should be confirmed for all stages (construction, operation, and de-commissioning) within the EIA.

Water Resources and Water Supply

The project which is within the AWS region is located within the Cambridge; Rutherford North; and Suffolk West & Cambs Water Resource Zones (WRZ). The AWS region is identified as 'seriously water stressed' in the Environment Agency's 2021 classification of water stressed areas. AWS notes the requirement of water supply for the construction, Operation, maintenance and decommissioning of the project has not been included within the scoping report.

One specific point for the Environmental Statement (ES) therefore and in view of the potential impacts on water resources, is that the applicant is advised to consider the published Water Resources East Regional Plan Regional Plan which sets out the collective water companies position in the East of England. The Water Resource Management Plan (WRMP) for AWS is available on our website and we would advise these documents are referenced in the Bibliography/ References of the EIA, as a data source.

As water will likely be used in the project either on a temporary or permanent basis, impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance.

There is a need to ensure that any development proposals do not have an adverse effect on any existing boreholes which are used to supply the public with drinking water. The EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA). AWS recommends that the WRA is an integral part of the chapter on Water Environment.

For applications under the 2008 Act, the WRA (or its summary) should form part of the EIA sufficient to enable regulators including the Environment Agency to advise the Examining Authority and the Secretary of State that the supply of water to the project is deliverable and sustainable. A WRA would include setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. AWS recommends that the WRA is an integral part of the EIA.

The project should not assume that water will be available for construction and operation. If that water supply is not available from Anglian Water, then alternative supplies through local abstraction may cause environmental harm and so not be consented by the Environment Agency. The construction of alternative water supplies may themselves generate Green House Gases (GHG).

AWS has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets, and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops, and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes.

Although AWS does not have a statutory obligation to supply for non-domestic purposes in these circumstances, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market.

AWS has adopted a Non-domestic demand December 2024' (copy attached) which states that requests over 20m3/day will be declined. However, for NSIPs that are requesting over 20m^3/day of non-domestic water (as defined above) for a scheme, a Water Resources Assessment (WRA) form must be completed Water Resource Assessment (NSIPS and SDOs) - template Feb 2025 FINAL.docx. This is so we can better understand water demands, water efficiency measures, and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

Our new position on non-household supply is due to our joint aim with the Environment Agency of reducing abstraction to protect sensitive environments. AWS now advise that new non-household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth.

The flows needed to fill water storage tanks for example (if rainwater harvesting on site is not used to meet non-potable demand) will need to be assessed by AWS to advise whether a supply is feasible, when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost.

AWS recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker. The Applicant should confirm that there will be no temporary concrete batching facilities with consequent water demands and would be offsite and so not require an on-site supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained.

We would advise you to contact planningliaison@anglianwater.co.uk to discuss the need for water and wastewater connections. The team can take you through the Inflow registration process InFlow | Development Services, the need to submit a pre-planning enquiry request and the requirement to complete a WRA form which will also need to be included in the EIA. This should set out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. A copy of our WRA template is attached.

Flooding and Surface Water Drainage

AWS is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems and welcomes the completion of a Flood Risk Assessment (FRA) as detailed in table 11.1 of the scoping report. It is unclear whether a Surface Water Management Plan (SWMP) will be included, however, AWS recommends a SWMP is completed to inform the impacts in the Hydrology, Hydrogeology and Flood risk associated with the project.

Our advice on surface water management is available here: aws-surface-water-guide-sm.pdf Potential embedded design measures should include Sustainable Drainage Systems (SuDS) to be utilised at permanent above ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations.

AWS will not accommodate any surface water run-off into a foul sewer, and only to a combined sewer in exceptional circumstances. Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy.

The FRA should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks. The likelihood of more extreme weather events leading to higher-than-average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.

Flooding from other sources should include reference to AWS infrastructure and further detail provided regarding potential temporary effects on flood risk from third party infrastructure works during construction of the project should be provided in the FRA, given the interfaces between the project and AWS assets. These interfaces will also be managed through the Protective Provisions and agreed construction practices.

Subject to confirmation that all surface water will be managed following the drainage hierarchy, including SuDS, AWS would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers.

We consider that SuDS and the potential for rainwater harvesting to serve any non-potable water requirements, should be used. Notwithstanding the lead roles of the Lead Local Flood Authority, the Environment Agency and the Internal Drainage Boards, AWS would welcome clarification on how consequent impacts on the local drainage/ sewerage network will be designed as part of the scheme. AWS will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.

We would encourage any pre-planning enquiries are made through our InFlow platform to ascertain the most appropriate solution is taken forward.

Scope of Environmental Impacts and Effects

Whilst most of the land within the draft order limits is agricultural there are limited interfaces with some of our water pipes that operate under pressure. Anglian Water welcomes the identification of sources of flooding in terms of surface water (pluvial) flooding, groundwater flooding, foul water, and flooding from artificial sources. We recommend further detail regarding potential temporary effects on flood risk from third party infrastructure works during construction of the project should be provided in the Flood Risk Assessment; given the interfaces between the project and AWS assets.

These interfaces should be managed through the Protective Provisions for AWS and agreed construction practices in the CEMP. Horizontal direct drilling (HDD) will need to take account of rising mains (pressurised sewer) to avoid pollution risk to protected habitats.

Approach to Cumulative Effects

AWS welcomes the use of a Cumulative Effects Assessment (CEA) as part of the EIA process to assess the inter relationships and cumulative effects of the project with other developments on the same single receptor or resource. AWS recognises that cumulative schemes are generally based on existing and/or approved development, given that the information is readily available from local authority planning registers or the Planning Inspectorate website. It is not clear whether projects in early stages of development that are brought to the attention of the Applicant and have the potential to interact in a cumulative manner, will be considered.

AWS is also the Applicant for the Fens Reservoir, which would be an NSIP relevant for identification on the long list (as part of the CEA) when establishing appropriate spatial and temporal limits and considering the Zone of Influence for each of the environmental factors.

Management Plans

It is understood from the Draft Commitments Register and Appendix C that relevant management plans such as the Construction Environmental Management Plan (CEMP), Operational Environmental Management Plan (OEMP), and Construction Traffic Management Plan (CTMP), are to be secured through requirements in the final DCO. Accordingly, AWS would request they be included as a consultee within the DCO Requirements for the approval of detailed management plans covering these matters.

Notwithstanding the above, AWS recommends outline management plans are prepared at an earlier opportunity to ensure any adverse impacts of construction, operation and decommissioning are picked up and adequately mitigated.

The outline Construction/ Operational and Decommissioning Environmental Management Plans should include mitigation measures required to safeguard and remove the risk of damage to AWS's assets, both below ground and above, from plant and machinery interference (compaction and vibration during the construction phase) including haul and access roads. The impact of traffic vibration on underground water/sewer mains will need to be identified sufficiently. This is mainly a risk where the depth of soil covering our assets has been reduced due to the construction of temporary construction compounds, bellmouths and haul roads used by construction traffic. We would seek appropriate mitigation measures to be addressed in the various construction, traffic, and noise/ vibration management plans to avoid any adverse impacts arising from construction traffic vibration on the operation of our assets.

Further advice on minimising and then relocating (where feasible) AWS existing assets can be obtained from: connections@anglianwater.co.uk

Major accidents and disasters

AWS welcomes section 17.3 of chapter 17 which addresses Major Accidents and Disasters. AWS identifies that the site is crossed by AWS utilities, including easement and separation distances required to be maintained. AWS would welcome specific reference on how the interfaces with utility assets such as sewers and water supply within the Order Limits will be managed through the construction of haul roads, bellmouths etc. Whilst Protective Provisions should address those interfaces with our assets, we would welcome further discussion with the applicant regarding such matters and their inclusion in the final versions of the DCO documents.

These documents should include steps to remove the risk of damage to our assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. AWS would seek to safeguard 24 hours /7-day access to our assets, and that this is not compromised. We would, therefore, welcome further discussion with the applicant regarding such matters and their inclusion in the finalised documents. AWS consider that until the clash assessment has been undertaken by AWS then likelihood and magnitude impacts cannot be assessed and so it is not possible to scope out these impacts from the EIA.

Engagement and Next Steps

Chapter 5 refers to the consultation process proposed for the project, as a statutory consultee and the water and sewerage undertaker for part of the area defined by the scoping boundary, AWS would welcome structured engagement with the Applicant throughout the forthcoming stages of the project. To address and resolve issues prior to the submission of the DCO, including Protective Provisions, in line with the requirements of the 2008 Planning Act and guidance.

Experience has shown that early engagement and then agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination.

Consultation at the statutory stages of consultation would in our view be too late to inform design and may result in objections and delays to the project, including potential requests to change the project 's Order Limits, to ensure services to existing customers and future growth are not prejudiced. We would encourage, the preparation of a Statement of Common Ground (SoCG) which should document key issues and the status of whether issues have been resolved or remain under discussion, which helps to reduce the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination.

AWS will seek to engage further with the Applicant through the forthcoming phases to discuss, amongst other matters:

- Impact of the development on AWS water supply, treatment, and recycling assets.
- The design of the project to minimise interaction with AWS existing and planned assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs, particularly the Fens Reservoir.
- Requirement for potable and raw water supplies (if any) and the inclusion of the Water Resource Assessment in the Environmental Impact Assessment.
- Requirement for water recycling connections (if any).
- Confirmation of the project cumulative impacts with AWS projects detailed within the consultation response and the need for further engagement on these matters.
- Draft Bespoke Protective Provisions and Requirements.
- The preparation of a draft Statement of Common Ground prior to submission.

Please do not hesitate to contact me on these aspects so they can be progressed during the pre-application to decision stages of the project, or should you require clarification on the above response.

Yours sincerely,

[redacted]

Strategic and Spatial Planning Lead
Growth, Planning and Capacity
Anglian Water

BEDFORD BOROUGH COUNCIL

Borough Charter granted in 1166

disability confident EMPLOYER

Chief Executive: Laura Church

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT PROCEDURE ORDER

BBC APPLICATION NO: 26/01906/LPA

To: The Planning Inspectorate

Bedford Borough Council *Has No Comment to make* *on* the development as set out on your website for application reference no **EN0110041**

APPLICANT : The Planning Inspectorate

LOCATION : Wind Turbines Old Halves Farm Chatteries Road Somersham Fenland PE28 3DR

PARTICULARS OF DEVELOPMENT :

(This application is not being determined by Bedford Borough Council. Please contact the Applicant for details or to make comments) Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) - Regulations 10 and 11 Proposed application by Vattenfall Wind Power Limited (the applicant) for an Order granting Development Consent for the Chatteris 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. To view plans go to https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110041

Signed:

[redacted]

Director of Environment

Planning, 4th Floor, Borough Hall,
Cauldwell Street, Bedford MK42 9AP
Telephone (01234) 718068 Fax (01234) 718084

Date: 27 October 2026

Cadent Gas Limited
Pilot Way
Ansty
Coventry
CV7 9JU
cadentgas.com

Submitted via email to; ChatterisWindFarm@planninginspectorate.gov.uk

Cadent
Your Gas Network

REF: EN0110041 Chatteris Wind Farm

PLANNING ACT 2008 CONSULTATION – EN0110041 Chatteris Wind Farm EIA Notification

I refer to your letter dated 29th September regarding the above proposed DCO. Cadent has reviewed the project plans provided and wishes to make the following comments:

Retained Assets:

In respect of existing Cadent infrastructure, Cadent will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus,

Cadent Infrastructure within or in close proximity to the development

Cadent has identified the following apparatus within the vicinity of the proposed works:

- Low and Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are also gas services and associated apparatus in the vicinity, these are not shown on plans but their presence should be anticipated)

Note: No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission.

Diversions:

Where diversions of apparatus are required to facilitate the scheme, Cadent will require adequate notice and discussions should be started at the earliest opportunity. Please be aware that diversions for high pressure apparatus can take more than two years to plan and procure materials.

Cadent will require the party requesting the diversion works to obtain any necessary land rights, planning permissions and other consents to enable the diversion works to be carried out. Details of these consents should be agreed in writing with Cadent before any application is made. Cadent requires a minimum of C4/ Design study to have been carried out to establish an appropriate diversion route, temporary and permanent land take ahead of any application being made.

Where diversions sit outside the highway boundary the party requesting the diversion will be responsible for obtaining at their cost and granting to Cadent the necessary land rights, on Cadent's standard terms, to allow the construction, maintenance, and access of the diverted apparatus. As such adequate land rights must be granted to Cadent (e.g. following the exercise of compulsory powers to acquire such rights included within the DCO) to enable works to proceed to Cadent's satisfaction. Cadent's approval to the land rights powers included in the DCO prior to submission is strongly recommended to avoid later substantive objection to the DCO. Land rights will be required to be obtained prior to construction and commissioning of any diverted apparatus, in order to avoid any delays to the project's timescales. A diversion agreement may be required addressing responsibility for works, timescales, expenses, and indemnity.

Protection/Protective Provisions:

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection for retained apparatus and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. Operations within Cadent's existing easement strips are not permitted without approval and will necessitate a Deed of Consent or Crossing Agreement being put in place. Any

proposals for work in the vicinity for Cadent's existing apparatus will require approval by Plant Protection under the Protective Provisions/Asset Protection Agreement and early discussions are advised.

Key Considerations:

- Cadent has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

- Please be aware that written permission is required before any works commence within the Cadent easement strip and a Crossing Agreement may be required if any apparatus needs to cross the Cadent easement strip

- The below guidance is not exhaustive and all works in the vicinity of Cadent's asset shall be subject to review and approval from Cadent's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and Cadent's specification for Safe Working in the Vicinity of Cadent High Pressure gas pipelines and associated installations - requirements for third parties GD/SP/SSW22. Digsafe leaflet Excavating Safely - Avoiding injury when working near gas pipes. There will be additional requirements dictated by Cadent's plant protection team.

- Cadent will also need to ensure that our pipelines remain accessible throughout and after completion of the works.

- The actual depth and position must be confirmed on site by trial hole investigation under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.

- If any excavations are planned within 3 metres of Cadent High-Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking place to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with Cadent's Plant Protection team is essential:

    - Demolition
    - Blasting
    - Piling and boring
    - Deep mining
    - Surface mineral extraction
    - Landfilling
    - Trenchless Techniques (e.g. HDD (Horizontal Directional Drilling), pipe splitting, tunnelling etc.)
    - Wind turbine installation
    - Solar farm installation
    - Tree planting schemes

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with Cadent prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent.
- Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to Cadent.
- A Cadent representative shall monitor any works within close proximity to the pipeline.

New Service Crossing:

- New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- A Cadent representative shall approve and supervise any new service crossing of a pipeline.
- An exposed pipeline should be suitable supported and removed prior to backfilling
- An exposed pipeline should be protected by matting and suitable timber cladding
- For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative procedure will apply therefore an integrity assessment must be conducted to confirm if diversion is required

Yours Faithfully

[redacted]

Planning and Consents Manager
[redacted] @cadentgas.com;
[redacted]

Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

http://www.hse.gov.uk/pubns/books/hsg47.htm

Essential Guidance document:

Digging Safely - Cadent Gas Ltd

SSW22 – Specification for Safe Working in the Vicinity of Cadent Assets:

SSW22_vMar23_Specification-for-Safe-Working-in-the-Vicinity-of-Cadent-Assets.pdf

Line Search Before You Dig (LSBUD) - LSBUD - Home

My ref: CWF.EIA.20261026
Your ref: **EN0110041**
Date: 27 October 2026
Contact: [redacted]
Email: NSIPs@cambridgeshire.gov.uk

[redacted], Executive Director
Place and Sustainability
Environment, Planning and Economy

Consents Team
PO Box 761
ALC2660
Huntingdon
Cambridgeshire
PE29 9QR

Sent via email to:
ChatterisWindFarm@planninginspectorate.gov.uk

Dear [redacted],

Environmental Impact Assessment (EIA) Scoping consultation by Vattenfall Wind Power Limited ("the Applicant") for Chatteris Wind Farm EN0110041 Development Consent Order (DCO) proposals

I am writing on behalf of Cambridgeshire County Council (the Council) in response to your request dated 29 September 2026 regarding the Applicant's EIA Scoping Report for the Chatteris Wind Farm proposals. The Council understands that the Applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008, and that the Applicant has sought a Scoping Opinion from the Planning Inspectorate (PINS), on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Council acknowledges that it has been identified by PINS as a consultation body to inform the Scoping Opinion. Attached to this letter is a table containing the Council's views on this matter. The Council reserves the right to comment further on all matters associated with the proposed development, as more detail becomes available.

If you have any queries regarding this submission or require any further information, please contact NSIPs@cambridgeshire.gov.uk.

Yours sincerely

[redacted]

Executive Director of Place and Sustainability

Our Reference: CWF.EIA.20261026

Chatteris Wind Farm: Comments on the Applicant's EIA Scoping Report

This document sets out the comments by Cambridgeshire County Council (**the Council**) regarding Vattenfall Wind Power Limited's (**the Applicant**) EIA Scoping Report for the Chatteris Wind Farm proposals.

The following table contains comments across a number of technical specialisms.

Specialism	Comments
Climate and Carbon	The lifecycle greenhouse gas (GHG) assessment includes emissions from material manufacture, transport, land-use change and commissioning (paragraph 12.2.1). However, clarification on how embodied carbon will be reduced through design, procurement and construction would be encouraged. Peat and peaty soils are identified throughout the report, but in the climate chapter there is less attention on the soil carbon losses, agricultural soil emissions and peat disturbance, and how this is reflected in the lifecycle carbon assessment. With this project located in the Fens, this consideration is important. Future climate projections are also based on a single climate scenario, SSP5-8.5 (paragraph 12.3.6). Although it is a "worst-case" scenario, with high GHG emissions, it would be useful to understand why only one scenario has been selected and used, and whether resilience measures will be tested against other pathways too. Sensitivity testing against a range of climate projections would provide greater confidence in the resilience of the proposed infrastructure under different future climate scenarios. Linking also its location in the Fens, clarification would be welcomed on whether the application will consider compounding climate risks, where this area is vulnerable to interacting risks of flooding, heavy rainfall, drought and groundwater conditions. Similarly, whilst the report identifies climate-resilient design and cooling systems (Table 12.4), further detail would be welcomed on the specific resilience measures proposed for battery energy storage

Specialism	Comments
	systems (BESS) and electrical infrastructure under future heatwave and drought conditions. Likewise, it would be helpful to understand whether climate adaptation measures will be subject to review throughout the operational life of the project to reflect evolving climate projections and best practice. Clarification would be welcomed on the key assumptions underpinning the carbon payback assessment (Table 12.4), including generation forecasts, operational lifetime and grid decarbonisation assumptions, as these will influence the calculated carbon benefits of the development.
Health	While the Scoping Report provides methodologies for assessing individual environmental topics, it does not provide a standalone methodology for assessing health and wellbeing impacts. The applicant proposes that health effects will be considered indirectly through topic-specific assessments; however, no framework is presented explaining how those effects will be integrated, how impacts on mental wellbeing and quality of life will be assessed, or how differential impacts on vulnerable populations and existing health inequalities will be evaluated. Consequently, the Council considers that the methodology for assessment of health and wellbeing remains insufficiently defined at the scoping stage. Given the scale and duration of the development, the extent of residential receptors, the potential for cumulative visual, noise, transport, and shadow flicker effects, and the presence of existing health inequalities within parts of Fenland, the Council's view is that there ought to be a proportionate Health Impact Assessment (HIA), or dedicated Human Health and Wellbeing Assessment chapter, undertaken to ensure health effects are assessed in a transparent and integrated manner. The HIA methodology / Human Health and Wellbeing Assessment chapter needs to be agreed with Public Health at Cambridgeshire County Council and needs to meet the requirements in the Fenland District Council Local Plan and the East Cambridgeshire District Council Local Plan. Health impacts, inequalities and mitigations will and should be embedded across all relevant chapters of the EIA, however a master summary ideally should be found in the Human Health and Wellbeing Assessment Chapter. This should include the Battery Energy Storage System and risks associated with a fire and/or pollutants from the site.

Specialism	Comments
	The Council will expect to see a Battery Safety Management Plan as part of the application. This should include an Emergency Response Plan. The Council would expect Cambridgeshire Fire and Rescue Service and the Cambridgeshire and Peterborough Resilience Forum.
Air Quality	The Council is not the statutory consultee for this subject area and so would expect the Planning Inspectorate (PINS) to consult East Cambridgeshire District Council and Fenland District Council on this matter. The Council would defer to East Cambridgeshire District Council and Fenland District Council for a detailed response. Notwithstanding the above, the Council may have concerns related to subject area impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation with the applicant, in particular where it relates to Health.
Communities, Skills, Employment, Socio-economics	The assessment highlights potential benefits for local employment and the economy but provides limited information on how local people will benefit through skills development, training, apprenticeships and employment opportunities. It also gives relatively little attention to wider community benefits, social value, inclusion, and potential impacts on local services and the rural economy. While these matters may be explored in greater detail as the project progresses, further information on mitigation and enhancement measures would help demonstrate how the project could deliver lasting benefits beyond economic growth alone. In addition to wider stakeholder engagement, targeted engagement with directly affected residents, businesses and organisations is recommended. Communities should be encouraged to express their views and help identify realistic mitigation measures, with engagement delivered through a range of accessible methods, including face-to-face, telephone, paper-based and digital approaches, to ensure meaningful participation from all groups, particularly those that may be under-represented. The project should also seek to maximise educational, skills and employment opportunities for local people. This could include commitments to local recruitment, training and apprenticeships, alongside educational initiatives such as visits for schools and community groups to increase understanding of the technology, renewable energy and associated career pathways. Active efforts should be made to utilise local skills, services and supply chains wherever possible, helping to create a positive and lasting local legacy.

Specialism	Comments
	The proposal refers to potential community benefit opportunities that may be explored through the project. It is important that these discussions are progressed meaningfully, including consideration of community benefit initiatives or a dedicated community benefit fund proportionate to the scale of the development. Further detail on how community benefits, support for local services, and targeted local investment will be identified and delivered would provide greater confidence that the project can generate long-term positive outcomes for local communities.
Noise	The Council is not the statutory consultee for this subject area and so would expect PINS to consult East Cambridgeshire District Council and Fenland District Council on this matter. The Council would defer to East Cambridgeshire District Council and Fenland District Council for a detailed response. Notwithstanding the above, the Council may have concerns related to subject area impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation with the applicant, in particular where it relates to Health.
Biodiversity	**Off-site export cable route & other off-site grid connection infrastructure beyond the Site.** 1.1.2 The Council is concerned that the Proposed Development does not include any off-site export cable route or other off-site grid connection infrastructure beyond the Proposed Development site, due to the potentially significant cumulative impact that the scheme and the offsite infrastructure will have on nationally and internationally designated wildlife sites and associated functionally linked land. 2.3.1 The Proposed Development's point of connection has been identified as the Burwell Main Electricity Substation. The route between the Proposed Development and the Substation will cross the Ouse Washes national and international sites and functionally linked land & across the landscaping including Wicken Fen Site of Special Scientific Interest (SSSI) and Fenland Special Area of Conservation. None of these impacts have been considered within Chapters 6 (biodiversity), 7 (ornithology) or 18 (cumulative impact). 4.2.2 The Council is unclear how the Environmental Statement can accurately (and proportionately) consider ecology and biodiversity during site selection, given that the impact of creating new grid connection / export cable routes have not been incorporated into the design choices. For example, the

Specialism	Comments
	cumulative impact of the scheme on the national and international designations may result in the location of the scheme being considered inappropriate and a more sensitive location selected. **Designations for birds and usage of the landscape by birds.** Wind farms can have significant impacts on birds, particularly migratory birds. The methodology set out in Chapters 6 and 7 is considered insufficient to adequately capture and evaluate the importance of the Proposed Development site and surrounding landscape for birds and impact on them. The Proposed Development site has been identified as functionally linked land for the Ouse Washes SSSI/ Special Protection Areas (SPA)/Ramsar site. It also forms a connection for birds of the Ouse Washes to other designations, including Berry Fen SSSI (supporting wintering birds of the Ouse Washes) and Nene Washes SSSI/SPA/Ramsar site, as well as Ely Pits and Meadows SSSI, The Wash, Wicken Fen SSSI / Fenland Special Area of Conservation (SAC) and other designations for bird species, or supporting habitats for these birds, within the wider landscape. This area is important for wintering birds, including Bewick and Whooper Swans, Marsh Harriers and Common Cranes. The report does not consider that the Proposed Development falls within an area of nature recovery for wetland habitats and bird species, and how, over the lifetime of the proposed development it is likely to be increased usage of the local landscape by bird species as a result of a number of projects / plans delivering: - Compensatory habitat for Ouse Washes - Langwood Fen / Block Fen vision area (Appendix 3, Cambridgeshire and Peterborough Minerals and Waste Local Plan) to restore mineral / waste site to create large-scale wet grassland for ground nesting birds to compliment Ouse Washes and associated agricultural reservoirs. Some land has already been restored, while others are under planning permissions. - Biodiversity Net Gain habitat banks delivering habitat for bird species - Large reservoir and wetland habitat as part of the Fens Reservoir Nationally Significant Infrastructure Project (NSIP) project.

Specialism	Comments
	- Cambridgeshire and Peterborough Local Nature Recovery Strategy wetland mosaic creation and enhancement of watercourses across the Proposed Development site and surrounding land. 6.2.2 / 7.2.1 and Tables 6.3, 6.4, 7.2 and 7.3. The Council recommends that the proposed study area should be expanded to 30km for statutory sites designated for their migratory bird species, and any additional sites for which the Proposed Development site support migratory species. These designations should all be 'scoped in' to the ecological impact assessment. Including the potential disruption of movement between the Ouse Washes and Berry Fen SSSI (supports wintering birds of the Ouse Washes) and Ely Pit and Meadows SSSI. As well as impact to designatory species of the Nene Washes SPA (including Black-tailed Godwit and, potential addition of Common Crane). The assessment should also take into account the recommendations of the JNCC (2025) Third Network Review of SPAs (Phase 2), which includes creation of a new SPA at RSPB Lakenheath Fen and update of boundaries and/or designatory bird species for Ouse Washes SPA, Nene Washes SPA and Breckland SPA. 6.3.2 & 7.3.2 We recommend British Trust for Ornithology (BTO), The Royal Society for the Protection of Birds (RSPB) and Wildfowl and Wetland Trust (WWT) are contacted to provide data on the usage of the landscape by bird species and their programmes to deliver habitat creation for birds. The Applicant should also seek to obtain the latest research from academics on bird migration and land usage and understand researchers of Whooper Swan migration have already been in contact with the applicant. Tables 6.3, 6.4, 7.2 and 7.3 should be updated to consider impacts to all sites designated for bird species within a 30km area. They should also consider impacts to the successful delivery of other plans and projects delivering nature recovery that will benefit bird species and the designated sites.

Specialism	Comments
	Ornithology The Council notes that survey methodology and assessment for collision risk will be based on NatureScot's guidance. We are unclear how this guidance directly relates to the lowland fen landscape of Cambridgeshire supporting a variety of designations for migratory birds and therefore, seek further information from the Applicant. The ornithological assessment should be based on the government's standing advice for 'Wild birds: surveys and monitoring for onshore wind farms' (gov.uk) and the 'Bird Survey Guidelines'. The proposed survey methodology does not meet these standards, and given the potential impact to international sites, the Council expects greater survey effort to understand usage of the landscape by birds. The survey work to date, shows the importance of the Development Site for birds. However, the methodology doesn't capture how the birds are utilising the landscape for roosting or migrating across the site (especially at night). Research on Whooper Swan migration has shown that reservoirs are utilised as alternative roost sites to the Ouse Washes and at this stage, the Applicant has not demonstrated how these sites will be impacted. In addition, the Applicant has not completed any dawn / dusk survey or night surveys to identify roosts sites and/or migration across the site. The provision of 3 vantage points is also considered inadequate. The Council seeks more comprehensive ornithological surveys be completed to understand the level of impact of the Proposed Development on birds, with focus on breeding birds, non-breeding bird and migration routes of designatory species of the Special Protection Areas in the landscape (including Ouse Washes, Nene Washes, Breckland SPA and RSPB Lakenheath). This should included dusk/dawn and night surveys (thermal) to identify roost sites and understand migration of these species. The methodology should be developed in consultation with Natural England, local authorities, researchers and RSPB / WWT and other experts. In addition, the Council seeks targeted survey work for Common Cranes (known to move between RSPB Lakenheath and Ouse Washes / Nene Washes) and Marsh Harriers that could also be impacted by the scheme.

Specialism	Comments
	7.4.12 The Council disagrees with the approach to not survey for passerines. Given the size and scale of the Proposed Development and potential impact to passerines (including notable farmland species), the Council considers survey work is required to understand the significance of the passerine bird population / assemblage utilising the Proposed Development site and level of impact. Table 7.2 and 7.3 should clearly identify individual 'ornithological receptors' rather than combining them all together because it's difficult to understand what sites or species will be incorporated. This should include breeding Stone Curlew and Marsh Harrier and designatory species of the statutory sites (e.g. Black-tailed Godwit, Common Crane, Whooper / Bewick Swan) and potential impact of loss of habitat, collision risk and displacement. Table 7.3 It is unclear why lighting is not considered as a potential during construction, particularly given that the government's standing advice identifies potential impact from aviation lights on birds. **Notable Flora** 6.3.12 The Council would expect detailed botanical surveys to be completed as part of the ecological surveys due to the presence of notable flora identified within the desktop search, and that nearby wildlife sites are designated for notable arable and aquatic flora (e.g. Mepal Gravel Pits County Wildlife Site and Sutton and Mepal Pumping Station Drains County Wildlife Site). These species could potentially be impacted by habitat loss or degradation, pollution, or changes to hydrology. **Survey methodology** 6.3.12 The Council would be keen to discuss the scope of all ecological survey work with the Applicant. The survey work should reflect the importance of this landscape to birds (as previously discussed) and the international importance of the fens for its invertebrates and flora; with a number of wildlife sites and drains in the local vicinity known to support important species / assemblages.

Specialism	Comments
	Hydrological Impact – habitat degradation & impact to wildlife sites Tables 6.3 and 6.4 do not consider potential hydrological impacts of the scheme during the construction, operational and decommissioning phase. Construction and decommissioning works will impact the watercourses (drains) on the site. Table 6.4 does not consider the impact that operational wind farms can have on the hydrology of the site including dry out reducing soil moisture content that could impact the peaty soils, farming practices, and the surrounding network of drains. Tables 6.3 and 6.4 need to consider the impact of changes to hydrology and associated degradation of habitat on international, national and local designations. For example, functionally linked land for Spined Loach (Ouse Washes SAC) and foraging land for foraging geese and swan (Ouse Washes SPA/Ramsar/SSSI); or the gravel pits and drains selected as County Wildlife Sites. **Electromagnetic field (EMF) impact – Spined Loach, fish and bats** Table 6.4 has scoped out the impact of electromagnetic field (EMF) sensitive aquatic species during construction and maintenance phase. This appears to be premature, given that fish surveys have not been completed and therefore, it is unknown whether the impacted watercourses are considered functionally linked land for Spined Loach population of the Ouse Washes SAC or support European Eel. Consideration should also be given to impacts on other sensitive species, such as bats which utilise watercourse as a key commuting corridor across the fens.
Archaeology and Historic Environment	The applicant has proposed that Cultural Heritage including below ground archaeology is scoped into the Environmental Statement (ES) for the Development Consent Order (DCO) application, which the Cambridgeshire Historic Environment Team (CHET) welcomes. The Council is concerned that the scoping report relied on the Heritage Gateway to inform the scoping opinion. This is a static dataset, not subject to updates for Cambridgeshire and we advise against its use for development proposals. We do however acknowledge the commitment to consulting the

Specialism	Comments
	County Historic Environment Record, the comprehensive source of information on undesignated heritage assets, archaeological sites and finds in Cambridgeshire. The Council is also concerned that no consideration of the fen landscape and geology is apparent in the scoping opinion, as this will influence the suite of techniques necessary to define the potential archaeological impacts of the proposed development. The scoping opinion proposes desk-based assessment and a walkover survey. This should include aerial photographic and lidar assessment. There is limited commitment to further evaluation strategies to inform the Environmental Statement (ES) in the scoping report. Geophysical survey should be considered and the advice of a recognised geophysical specialist, preferably with experience of fen landscapes, should be sought. Of particular importance will be geoarchaeological assessment, which should include existing sources and new borehole/test pitting to build an understanding of the fen sequences in the area and their potential for the survival of preserved organic remains. Trial trench evaluation will also be necessary to test areas of higher 'islands' within the fen landscape, typically the focus for Neolithic and Bronze Age activity. The above surveys should be undertaken to inform the Environmental Impact Assessment and submitted with the ES. The submission should also include the proposals for mitigating the archaeological impact of the proposed development. **Table 8.1** The Council welcomes the proposal for micro-siting of infrastructure to avoid or minimise effects on heritage assets. However, the extent and significance of heritage assets cannot be determined by desk-based research and walkover survey alone. Trial trenching is described as mitigation. It is a common evaluation technique used to inform mitigation.

Specialism	Comments
	The Council is pleased to note that indirect physical effects are scoped in. This should include consideration of hydrological changes and the potential impact of dewatering on preserved organic deposits. Decommissioning has been scoped out. As the built form of the development has not been finalised and the archaeological impacts are not currently known, we consider that this should be scoped in. There is no certainty that decommissioning works will be restricted to pre-existing construction impacts and indirect impacts may also be a consideration.
Landscape and Visual	The Council is not the statutory consultee for this subject area and so would expect PINS to consult East Cambridgeshire District Council and Fenland District Council on this matter. The Council would defer to East Cambridgeshire District Council and Fenland District Council for a detailed response. Notwithstanding the above, the Council may have concerns related to subject area impacts from the proposal and therefore reserves the right to comment on this subject through technical working groups and future consultation with the applicant, in particular where it relates to Health.
Minerals and Waste	**Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) (July 2021)** Scoping Report paragraph 3.5.10 - Allocations for mineral extraction are made in MWLP Policy 2: Providing for Mineral Extraction. The Site does not fall within any areas allocated for mineral development but includes the Sutton Gault Mineral Development Area (MDA) (Policy 6) around which is a Consultation Area (Policy 16). This MDA encompasses a series of irrigation reservoirs which have been or are shortly to be completed with the margins subject to a period of aftercare management. The southernmost part of the Site includes approximately a third of the site of an irrigation reservoir to serve Bridge Farm, Colne that has planning permission (reference CCC/22/091/FUL) but has not yet been constructed; the principle of an MDA and Consultation Area applies.

Specialism	Comments
	Most of the Site is within a sand and gravel Mineral Safeguarding Area and consultation with the mineral planning authority is required by MWLP Policy 5: Mineral Safeguarding Areas. These are policy matters which should be addressed in the application but not necessarily in the ES. If land within the Site has been put forward by its owner to be considered for mineral or waste development in the Scoping Consultation of the Cambridgeshire and Peterborough Minerals and Waste Local Plan Review, the Council questions whether this be compatible and deliverable with the proposed wind farm. The Council is considering a planning application for a waste-fed anaerobic digestion plant on land within the Site (reference CCC/26/083/FUL) and includes the northernmost turbine. Borrow pits – the Council agree that if some of the mineral necessary for construction is sourced from borrow pits this is covered in the ES, including their appropriate restoration. MWLP Policy 7 applies. Waste – the Council agree with the proposed scope of the waste assessment. Ornithology – MWLP Appendix 2 – Block Fen / Langwood Fen Master Plan. This shows part of the MDA, all of allocation M035 and part of allocation M036 being restored to complementary Ouse Washes habitat which is suitable for ground nesting and wintering birds. Hydrology – The Block Fen / Langwood Fen Master Plan shows part of the MDA and most of allocation M036 being restored as water storage bodies. These could form part of the Environment Agency's Cranbrook / Counter Drain Flood Risk Management Strategy. Traffic and access – The proposed principal point of access on the A142 would be close to the roundabout which serves an anaerobic digestion plant and also forms the junction with Block Fen Drove which is the sole access to three quarries and a large waste management site.
Water Resources and Flooding	**Comments from the Lead Local Flood Authority (LLFA)** The Scoping Report submitted includes information on surface water flood risk, and demonstrates consideration for water quality, climate change, access for maintenance, as well as protection of

Specialism	Comments
	surface water during the construction and decommissioning phases. At present there are no details as to how surface water will be managed onsite. As the LLFA we expect a full flood risk assessment and/or surface water drainage strategy to be submitted to support any planning application, including DCOs, which must include: 1. How the proposed surface water drainage scheme has been determined following the drainage hierarchy 2. Pre-development run-off rates 3. Post development run-off rates with associated storm water calculations 4. Discharge location(s) 5. Drainage calculations to support the design of the system 6. Drawings of the proposed surface water drainage scheme including sub-catchment breakdowns where applicable 7. Maintenance and management plan of the surface water drainage system (for the lifetime of the development) including details of future adoption To provide additional support, we offer a pre-application advice service. The applicant should, as part of the surface water strategy, demonstrate that the requirements of any local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered. Part or all of the proposed development area falls within the Middle Level Commissioners (MLC) catchment. All increased discharges proposed to enter watercourses directly or indirectly or any works affecting watercourses or access to or along them for maintenance if the site is within the Board's district will require MLC/Internal Drainage Board (IDB) consent. It is therefore recommended that the Applicant contacts the IDB/MLC to discuss their requirements. Further information is available at: https://middlelevel.gov.uk/

Specialism	Comments
	In relation to the Battery Energy Storage System (BESS), surface water runoff generated by the proposed development should be managed appropriately and restricted to greenfield runoff rates. The development should not increase flood risk on-site or elsewhere during construction or operation, including consideration of climate change allowances and exceedance events. Particular consideration should be given to the management of runoff from operational and emergency scenarios, including potential contaminated firewater resulting from thermal runaway incidents. Water quality should be a key consideration, and the applicant should demonstrate that appropriate firewater containment and pollution control measures are provided to prevent contamination of groundwater, surface waters and ordinary watercourses, particularly in the event of a BESS fire or thermal runaway incident.
Traffic and Transport	**Transport Assessment** Any transport assessment submitted to support the proposals needs to be in accordance with the Council's Transport Assessment (TA) Requirements. The Council's TA guidelines can be found here Developing new communities | Cambridgeshire County Council https://www.cambridgeshire.gov.uk/business/planning-and-development/developing-new-communities. Pre-application advice is available, and details can be found at the following link Developing new communities | Cambridgeshire County Council https://www.cambridgeshire.gov.uk/business/planning-and-development/developing-new-communities Cambridgeshire's Active Travel Toolkit can be found at the following link Cambridgeshire's Active Travel Strategy | Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy The applicant should ensure that the transport data used in the EIA and the TA are from the same source to ensure consistency between the two documents. The Transport Assessment should give details of the following:

Specialism	Comments
	• A profile of the likely daily (2-way) traffic associated with the construction phase over the 24-month construction period and decommissioning periods. Also, daily and peak hour all mode trips generated over various phases. • This should be further broken down into vehicle classifications with particular emphasis of the type of Heavy Goods Vehicles (HGVs) that will be used and any 'abnormal' or oversized vehicle movements. • The proposed routing of vehicles to and from the Strategic Road Network with pinch points such as congested links and or junctions being identified. • The applicant should refer to the Council's 'Transport Assessment Requirements 2024', which sets out the trigger points for further link or junction analysis to be undertaken. Non-Motorised User (NMU) and Road Safety Audits must be carried out where the proposal could result in increased conflict between vehicles and Non-Motorised Users and where the nature of the highway infrastructure changes such that there may be consequential Road Safety issues across all user groups. There is likely to be a requirement for enhanced NMU infrastructure to mitigate the impact of the large volumes of HGVs associated with construction and decommissioning phases. Mitigation measures will be required to mitigate the impact of the development and enhance connections by sustainable modes. A Travel Plan for the construction phase should be submitted. Given the potential for overlapping construction periods with the Redmere wind farm and the Fens Reservoir, a cumulative traffic assessment needs to be carried out. Whilst the Council has not undertaken a detailed validation of all developments included within the cumulative development long list (Figure 18.1a), and notes that the final list of developments to be assessed as part of any future Transport Assessment should be agreed with the Local Highway Authority, it is apparent that a number of developments within the Chatteris area have been omitted from the cumulative assessment. These developments are likely to have a material influence on future

Specialism	Comments
	traffic conditions and should therefore be included within the assessment. They include, but are not limited to: • F/YR23/0697/FDL - Residential development of 152 dwellings on land south of The Elms, Chatteris. • F/YR23/0349/VOC - Strategic mixed-use development comprising up to 1,000 dwellings, commercial development, a local centre, and a primary school. As the application progresses, the council would expect further engagement with construction traffic routing and abnormal loads. It is unlikely that the site will require operational modelling, but this will be confirmed as part of the scoping for the Transport Assessment. **Highway Development Management** Whilst the identification of impacts in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines is broadly supported, the Scoping Report correctly acknowledges that a more nuanced assessment of certain traffic and transport impacts will be required on some parts of the highway network. The Local Highway Authority emphasises the importance of this point, as some traffic and transport related effects, for example NMU amenity road safety, highway capacity and highway asset condition cannot be assessed using changes in traffic movements associated with the proposed development. The Local Highway Authority notes that elements of the anticipated construction traffic route are located on roads identified within the Authority's Soil Affected Roads network. Such roads can be more susceptible to deformation and deterioration as a consequence of sustained heavy vehicle loading. The Authority therefore recommends that the Environmental Statement and any subsequent Transport Assessment consider the suitability and resilience of the local highway network to accommodate

Specialism	Comments
	construction traffic and abnormal load movements, including the potential effects on Soil Affected Roads. Consideration should also be given to the suitability and resilience of structures and other highway assets located on proposed construction traffic and abnormal load routes, together with any monitoring, protection, maintenance or mitigation measures that may be required. This is in addition to any requirements within a future Construction Traffic Management Plan (CTMP) for pre- and post-construction highway condition surveys and appropriate mechanisms for identifying and addressing damage attributable to construction traffic. The Local Highway Authority notes that Section 9 of Appendix B does not currently identify several relevant Cambridgeshire County Council transport and highway documents. Further to the above the assessment of traffic and transport impacts within a future Transport Assessment should have regard, where relevant, to Local Highway Authority policies and guidance, including: • *Transport Assessment Requirements* (January 2024); • *General Principles for Development* (January 2023); • *Housing Estate Road Construction Specification (HERCS)* (January 2023); and • *Public Rights of Way Improvement Plan* (April 2016).
Public Rights of Way (PROW)	The Council notes that there are Public Rights of Way (PROWs) that are directly and indirectly affected by the proposals. At this stage it is not possible to accurately gauge the impact of the development on each PROW, and it is not known which PROW might be subject to temporary or permanent closures or diversions. Therefore, the Council reserves the right to comment further on the impact the development would have on PROW, and potential mitigations the authority might seek, until further details are available. Understanding the potential visual impact of the development on receptors who use the Council's PROW and rural road network forms an important part of the Council's consideration of the proposed development. This will inform the mitigation measures that the Council feels are appropriate. The

Specialism	Comments
	Council would welcome the opportunity to contribute to the selection of representative viewpoints on its PROW network. National Planning Policy Framework section TR8 Public Rights of Way states: 1. Development proposals should: a. Protect and enhance the network of public rights of way, including through suitable diversions agreed with the highway authority; and b. Take opportunities to extend, link or improve the quality of existing routes where this enables one or more of the following: i. Improved access to green spaces and the countryside; ii. New direct and circular routes and connections between local and long-distance footpaths, bridleways and cycle routes; iii. The provision of accessible, safe and convenient links to services and facilities; and iv. Improved connections with public transport stops and interchanges. Accordingly, the Council wishes to understand how the Applicant intends to maximise this opportunity to deliver mitigations and enhancements to the PROW network in the affected area and its hinterland, to reduce the negative impacts of the development and support achievement of a positive legacy. Mitigation options for the impact that the development will have on PROW users should not be confined to the development boundary. The development will have a lasting impact on the landscape throughout the lifespan of the wind farm. Where effects of the development cannot be avoided, appropriate mitigation measures should be provided, and where significant effects remain the Council would expect compensatory measures to be provided that deliver equivalent or enhanced public benefit. Cambridgeshire's Rights of Way Improvement Plan (ROWIP) should be considered by the applicant when proposing temporary and permanent alterations to the PROW network affected by the wind farm.

Specialism	Comments
	The Council will challenge the imposition of any changes that are contrary to the ambitions of the ROWIP or the NPPF. In section 13.3.1 it states: “Norfolk County Council and Suffolk County Council highway information, as available, including details of the local road network, traffic regulation orders and public rights of way;” The data sources for Chatteris wind farm should also include Cambridgeshire County Council highway information.
Active Travel	The Council’s Active Travel team reiterates the need for mitigation of the impact of the development on NMUs to extend beyond the development boundary. Several byways connecting Chatteris, Somersham, and Sutton fall within and outside of the boundary and are well used by NMUs. The scale of development in the area, including the Fens Reservoir and large housing developments, means desire for improved access to the countryside, for leisure and utility trips, will increase.
Emergency Planning	Given the inclusion of the battery energy storage system (BESS) within the proposal, the Council expects the Environmental Statement to include an assessment of major accident and disaster risks, including thermal runaway events and fire. The applicant should outline proposed fire prevention, detection, suppression and emergency response measure, including a battery safety and fire management plan. The applicant should also consult with the relevant Fire and Rescue Service.
Grid Connection	The grid connection(s), consisting of the pylons and a substation, are key to the scheme without which the project is undeliverable. The understanding is that these elements are to be delivered separately by National Grid. The route of the pylons is unknown, and the exact location of the connection at Burwell is yet to be confirmed. The council would wish to see as a minimum an indicative pylon route and connection at Burwell against which the cumulative impact of such infrastructure can be assessed. This would form part of the Cumulative Impact Assessment.

Further to the officer response we have received comments made by the Chair and Vice-chair of the County Council's Environment and Green Investment Committee. These are set out below:

Battery Energy Storage System (BESS)

Battery energy storage remains a recurring issue in local political and community discussions regarding renewable energy developments. Concerns relating to lithium-ion battery technology, particularly in relation to fire safety and emergency response, are frequently raised by residents and stakeholders and should be recognised as legitimate matters of public concern. The Environmental Impact Assessment should therefore consider a range of battery storage technologies, rather than focusing solely on lithium-ion systems, and assess whether alternative technologies could reduce these concerns whilst delivering the required operational performance. This would help demonstrate whether local concerns can be mitigated through the adoption of alternative battery storage solutions.

I would be grateful if you could register these comments in addition to the above representations made by the County Council.

Development Management

Central Bedfordshire Council
Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ
www.centralbedfordshire.gov.uk

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

Contact [redacted]
Direct Dial
Email [redacted]@centralbedfordshire.gov.uk
Your Ref
Date 23 October 2026

Dear Planning Inspectorate,

Your Ref:	**EN0110041**
Council Ref:	**CB/26/02983/OAC**
Location:	**South of Chatteris, East Anglia**
Proposal:	**EIA Scoping consultation for: Proposed application by Vattenfall Wind Power Limited (the applicant) for an Order granting Development Consent for the Chatteris Wind Farm (the proposed development)**

I refer to your letter of 29 September 2026 regarding the planning application as shown above and would confirm that Central Bedfordshire Council do not have any comments.

Yours sincerely,

[redacted]

Service Director Development & Economy

-----Original Message-----
From: [redacted]@chatteristowncouncil.gov.uk>
Sent: 19 October 2026 11:16
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Subject: Chatteris Wind Farm Scoping Opinion

[You don't often get email from [redacted]

Dear Sir/Madam

Chatteris Town Council has been asked to comment on the scoping consultation for the Chatteris Wind Farm proposed development.
The Council has agreed to make the following comments:
"The scoping opinion should ensure that the Wind Farm is not constructed on a flight path for migratory birds; looks at concerns about the positioning of the turbines which could result in smells from the nearby anaerobic digester being directed towards Chatteris and should also make provisions for the protection of wildlife."

Yours sincerely,

[redacted]
Town Clerk
E-mail:-[redacted]@chatteristowncouncil.gov.uk
Telephone:-[redacted]

Disclaimer
This email is confidential, and may be legally privileged. If you are not the intended recipient, do not copy, use or disclose its content, but contact the sender immediately. Whilst we run anti-virus software on all internet emails, we are not liable for any loss or damage sustained as a result of software viruses. The recipient is advised to run their own anti-virus software. If you have received this email in error, please immediately notify us at [redacted]@chatteristowncouncil.gov.uk or telephone [redacted]

East Cambridgeshire District Council

www.eastcambs.gov.uk
ContactUs@eastcambs.gov.uk
01353 665555

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

Via email only to:
ChatterisWindFarm@planninginspectorate.gov.uk

This matter is being dealt with by

[redacted]

Email: [redacted]@eastcambs.gov.uk

Phone: [redacted]
My reference: EXT/00015/26
Your reference: EN0110041
Date: 27th October 2026

If you require this letter in large format, please email ContactUs@eastcambs.gov.uk.

Dear [redacted],

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

Proposed application by Vattenfall Wind Power Limited (the applicant) for an Order granting Development Consent for the Chatteris Wind Farm (the proposed development)

I write in relation to the consultation on the EIA Scoping Opinion for the above development on behalf of East Cambridgeshire District Council (ECDC).

The Council has reviewed the applicant's EIA Scoping Report and appendices (prepared by ERM on behalf of Vattenfall, dated September 2026). Our comments relate to the proposed wind turbines, on-site Battery Energy Storage System (BESS), on-site substation and associated infrastructure and their wider study areas within the Council's administrative boundary.

Comments from the Council's internal departments and specialist officers have been sought to inform this response. It is understood that Cambridgeshire County Council and Fenland District Council will respond separately to this consultation, along with other consultees, and this response therefore seeks to comment on only those matters within the jurisdiction and specialisms of this Council and its functions.

As such, we set out below our general observations relating to the EIA Scoping Report, followed by specific comments and observations on the topic specific chapters.

General Comments

Firstly, in the interests of clarity, we would ask that at least one of the submitted figures in the proposed application clearly shows the district and county boundaries on the site plan to help consultees and the public understand how the proposal crosses the different administrative areas of the organisations involved.

In general, it is considered that the EIA Scoping Report and Appendices mostly set out an appropriate scope within each topic area for inclusion within the Environmental Statement (ES). Where comments from specialist officers within the Council concur with the conclusions in the Applicant's Scoping Report, they are not repeated for conciseness. A short summary is provided where matters of difference arise.

For section 2, when describing the proposed development in the ES it would be useful to have clarity of the status of the majority of the land within the Order Limits where no turbine, substation, BESS, compound, access track, hardstanding etc is due to be located. For example, to confirm whether agricultural use (particularly where that impacts on Best and Most Versatile Land) would continue or cease during all the construction, operation, and decommissioning phases, and whether the site would be enclosed at all boundaries.

Whist the turbine locations are indicated with a micro-siting allowance, there is no such description of the siting of the BESS, electrical infrastructure, accesses, compounds, which form a significant component of the proposed development. The Council notes that the proposed development does not include any off-site export cable route nor other off-site grid connection infrastructure beyond the site, despite identifying Burwell Main Electricity Substation (within the ECDC district) as the development's point of connection and acknowledging that the development would be dependent on that connection. Such a connection would be approximately 20km long, across the ECDC district. Other than the comments in section 2.3, the EIA Scoping Report makes little reference to the grid connection being included for consideration in the assessment topics, cumulative effects, nor does it appear in the Appendix A Figures, for example for the LVIA viewpoints. The outline design principles for the off-site cable connection infrastructure set out in section 2.3.8 of the EIA Scoping Report are couched as "could reasonably inform" and "may include" rather than definitive terms.

With reference to Sections 2.4.6 - 2.4.12, there is a failure to recognise that the BESS is unlikely to have a lifespan of 40 years (the life of the project) and are likely to be replaced or significantly upgraded at least once, but potentially up to 3 times, during the life of the project. This should be recognised and implications considered in the subsequent ES.

It is of particular concern that the site is immediately adjacent to an internationally designated habitat, namely Ouse Washes RAMSAR, SPA, SAC, SSSI, with any connection route likely to need to cross this designated habitat. Further specific comments on this are provided later in this correspondence. As such, the Council have strong concerns that in the absence of considering the grid connection route, the EIA Scoping exercise does not define the full extent of the assessment that needs to be captured within the resulting ES. As such, this leaves the Council in a position where they cannot comment on how the grid connection aspect will be considered in the resulting ES in respect of all topic areas. Other NSIPs in the ECDC district are intending to connect to Burwell, and this information is presented in a clearer manner. The Council are concerned about

the issue of 'salami slicing' and as the grid connection is a critical part of delivery of the project, the development envelope should be properly defined and assessed in this regard.

In respect of alternatives, the Council note the legal responsibilities under the EIA Regulations to consider 'reasonable alternatives. From the policy perspective, the Council further note Paragraph 4.3.29 of the Overarching National Policy Statement (EN-1) states that "*potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant).*"

Given that the Council have had limited discussions with the Applicant to date, prior to the submission of the EIA Scoping Opinion, we would welcome further details from the Applicant on the reasonable alternatives considered. In this regard, it would be helpful for the Applicant to present such information in a coherent and transparent manner, (ideally through spatial presentation), in order to provide confirmation that those alternate areas of land that have been considered, areas that may bring about lesser and/or reduced environmental effects.

In making these comments, we particularly refer to the Governments Pre-Application Advice on EIA for NSIPs[1] which sets out the 'useful' information for an EIA Scoping Report to consider, which includes (amongst other matters) '*an outline of the reasonable alternatives studied and the reasons for selecting the preferred option including any views sought through consultation and/ or engagement and how these have informed decision-making – or, where alternatives remain under consideration, a description of how it proposes to select the preferred option(s) taking into effects on the environment.'*

Finally, in respect of study areas, the Council would confirm that for certain topic areas, it would be helpful to provide a greater explanation of the study areas chosen. For example, whilst Table 18.1 within the EIA Scoping Report sets out the Zones of Influence, this is a factual description of, rather than a justification of the study areas, noting that, the Order Limits are also described as 'indicative' and therefore this must be treated with a degree of caution on this basis. Whilst some topics are more specific, some topics such as landscape and visual and cultural heritage refer to the more generic '*Study Areas have been defined with regard to the scale and nature of the Proposed Development and relevant best practice'* It appears to the Council that such best practice guidance has not been qualified. Accordingly, the Council would welcome further discussion on this issue, such that study areas are appropriately defined and justified.

Policy

The EIA Scoping Report refers to the Development Plan for the Council, without listing all the relevant policies (for example, GROWTH 2 Locational strategy, ENV 1 Landscape and settlement character, ENV 2 Design, ENV 7 Biodiversity and geology, ENV 8 Flood risk, ENV 9 Pollution). The Scoping Report does mention the Climate Change SPD and Renewable Energy Development (Commercial Scale) SPD. The following will be relevant also:

- East Cambridgeshire District Council's Natural Environment SPD (2020).
- East Cambridgeshire District Council County Wildlife Sites SPD (2010).
- Cambridgeshire Flood and Water SPD (2016).

[1] Nationally Significant Infrastructure Projects: Pre-Application Advice on Environmental Impact Assessment - GOV.UK

- Sutton Replacement Neighbourhood Plan (made July 2024).

The Cambridgeshire and Peterborough Local Nature Recovery Strategy was published in December 2025 and will be also relevant to the proposed development.

Biodiversity and Nature Conservation

Overview

The site is within an ecologically important area. Figures 6.1 identifies the County Wildlife Sites next to and inside the site, and priority habitats. Figure 6.2 identifies the nearby Ouse Washes Ramsar, Special Protection Area and SSSI, and overlapping Special Area of Conservation site. The proposed site is within the SSSI consultation zone and impact risk zone.

As noted earlier, without a suggested grid connection corridor included in the EIA Scoping Report, the Council cannot comment on the surveying required to fully inform this chapter of the ES, noting that it if the connection is to Burwell that it would be a long corridor crossing a range of habitats and protected sites. We would welcome further discussions on this with the Applicant. Further to this, on the basis that the proposed site is immediately adjacent to an internationally designated habitat, within the functionally linked land of another, and that the Proposed Development is identified by the Applicant as connecting to Burwell sub-station, and that the only feasible way to connect the site with Burwell is over (or under) the internationally designated habitat (or at the very least under the precautionary principle, a 'worst case option' as a minimum exists to cross the designated habitat), it is considered that the EIA Scoping Report fails to adequately consider the issues of such a grid connection associated with, at the very least, the internationally designated habitat. Simply dismissing the grid connection to the ES stage (with very little commentary on how the ES will consider grid connection issues, if at all) is not considered adequate in the circumstance of this proposed site (i.e. it being immediately adjacent to an internationally designated habitat, and grid connection highly likely to traverse over/under it). If the grid connection was given more appropriate consideration, it is possible that additional matters may have been brought 'in scope' for the purpose of the ES to follow.

There are areas of the site that are within an amber risk zone for Great Crested Newts, so seeing amphibians scoped in is welcomed.

Reference to irreplaceable habitats, such as lowland fens, is not immediately apparent within the Scoping Report. The Council also wishes to draw attention to The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, which provides a broader but equally important definition of irreplaceable habitats for the purposes of assessment and net gain.

Section 1.1.2 of the Scoping Report states the development will include "biodiversity enhancement and amenity works" and section 4.4.2 notes the design principle to "deliver measurable biodiversity enhancements," with Tables 6.3, 6.4 and 7.3 similarly referring to enhancements. The Council welcomes further discussions with the Applicant on opportunities for these enhancements. The following specific comments are made on relevant EIA Scoping Chapters, relative to Biodiversity and Nature Conservation.

Chapter 6

Para 6.1.2 – whilst accepting the paragraph refers to "including" (rather than limited to), it is disappointing considering the context of the site immediately adjacent to an international designated SPA site, that birds are not referenced. The significance of effects on bird species is a

critical requirement of the EIA process and ES and should have been acknowledged in this paragraph.

There is a wider issue that birds are being treated separately (under section 7), though this is not explained in section 6, leading to confusion.

Para 6.2.1 - The "desk top search" is stated as being limited to 5km for nationally designated sites and 10km for internationally designated sites. We disagree with such limitations. Many of the national and international designations within the Fenland / East Cambridgeshire area are bird related, and consequently development proposals some distance away can have significant effects on such bird species. Such bird species are known to 'commute' between these numerous designated sites. It is considered it is critical that national sites within 15km and international sites within 30km are considered within the search, to reflect a best practice approach for NSIPs. Table 18.1 should also be updated.

Para 6.3.2 - BTO, WWT and RSPB should be asked for bird survey information relating to the sites. Consequently, Para 6.3.4 fails to consider, for example, Fenland SAC (16km), Nene Washes SPA (approx. 22km), The Ouse Washes SPA (within 50m), and Breckland SPA (30km). In addition, numerous national (SSSI) sites would also be appropriately considered if the zone were extended to 15km, including Ely Pitts and SSSIs along the River Ouse.

Tables 6.3 – 6.4 - These tables identify a large quantity of 'scoped in' matters, which are agreed, and a limited number of 'scoped out' (also agreed). However, the receptors in Table 6.3 should be updated to reflect the matters raised under Para 6.21 above.

Electromagnetic field should be scoped in until such a time the nature of the impact can be determined so as to avoid or minimise any resulting effects on aquatic species such as eels (of which Ely is named after), which will likely still use the watercourses and fields in the district to migrate. The electric cable routes and BESS storage sites, especially those near waterbodies, have the potential for significant harm to a critically endangered species. Separately, with no known impacts due to lack of scientific data, it cannot be ruled out that no harm will result from electromagnetic fields to spined loach (a SAC qualifying feature species) which have a reasonable prospect of residing in the site's drainage network, particularly given the proximity (less than 500m) to the SAC.

Consideration to the existing cable network which is well known to already have a negative ongoing impact on qualifying species of the SPA should be scoped into the assessment.

Chapter 7

Table 7.1 - The goose and swan IRZ (linked to the Ouse Washes designation) has not been considered. In addition, this functionally linked land connects the Redmere farm to the Ouse washes SPA adding to in combination and cumulative impacts to the Ouse washes SPA qualifying species.

Para 7.2.1 -As referenced in the earlier comments, and for the same reasons, the Council consider the study area should be extended to 15km for national sites and 30km for international designated sites, primarily because of the qualifying species associated with designated sites in the broad region of Cambridgeshire / Norfolk, and the high degree of commute between such sites. By doing so, additional designated sites should be listed in Table 7.1.

Para 7.3.2 -It is critical that the Wildfowl and Wetlands Trust (WWT), RSPB and BTO are also contacted for sources of ornithological data, bearing in mind that the Welney WWT is in close

proximity to the site. WWT is presently not listed in Para 7.3.2 and given their research into the migratory patterns of the migratory swans, this is essential.

Para 7.4.3 – Whilst noting the comments referring to Scottish Guidance, in England relevant guidance includes Bird Survey Guidelines | for ecological impact assessment which regards the species and site designations in regard to survey methodology. The government also has provided guidance for onshore wind *farms* *Wild birds: surveys and monitoring for onshore wind farms - GOV.UK*.

Other Matters – The Council consider Bird displacement should be scoped in. Wind turbines can create a minimum 500m plus displacement (which is within the SPA area) and a significant reduction in bird breeding for small birds such as skylark. Equivalent impacts exist for larger birds, and this is an essential consideration.

In combination impacts – Taking into account all the windfarms in fenland already and the proposed Eaubrink (Kings Lynn) wind farm will require careful consideration of the suitability of the site's location on the Ouse washes as part of the HRA if not also within the ES. The entire Goose and swan IRZ impacts with the combined Redmere and Chatteris with Eaubrink (and others) should be considered.

Para 7.44 (Flight Activity Surveys) – Whilst such surveys are noted there appears a lack of surveying in the period dusk to dawn, which would reflect the peak period for wetland birds, such as Swans and Geese (for which the Washes are renowned for). Vague reference to nocturnal surveys is given at Para 7.4.11. It will be critical that any ES has robust data and analysis for flight activities across 24-hour periods, not just daylight hours. Many of the qualifying SPA birds migrate at night. This will also apply to any grid connection power lines that are erected.

Para 7.4.13 - demonstrates this is already likely to include functionally linked land to the Ouse washes SPA for species other than geese and swan. Given that in February 2026 there was significant flooding on the Ouse Washes displacing many birds, a locally significant number of birds were using this land.

Figure 7.2 - flight activity survey vantage points have little context to draw any opinion on at this time, it suggests that areas within the Order Limits area were not surveyed.

Figure 9.4 - is missing the goose and swan IRZ showing functionally linked land to the Ouse Washes as mapped by Natural England.

Table 7.2 – this is stated as being 'scoped out' because of "Due to distance and lack of connectivity for designated features, potential effects on Berry Fen SSSI are scoped out." This is not agreed. The SSSI citation for Berry Fen includes the following:

"[Berry Fen] is located close to the internationally important Ouse Washes, and this factor influences the use of Berry Fen by wintering wildfowl, especially when the Washes are too deeply flooded. In particular, the Bewick's swan numbers reach nationally significant levels."

On the basis that such swan's would, when traversing from the Washes to Berry Fen, quite possibly (even likely) fly directly over the site, it is not possible to scope out any harm at this stage. The ES (and HRA) needs to fully consider what impact the application might have on species which commute between the Washes and Berry fen, and the impact on Berry Fen (and its qualifying species).

Table 7.3 - Aside from the minor issue of table 7.3 headings being wrong, it is not clear why the 'receptors' in table 7.2 are not equally relevant in 7.3. For example, the Ouse Washes SPA could be impacted (and hence scoped in) during operation (table 7.3), not just during construction (table 7.2).

Chapter 10
Ecological receptors have not been considered within this section given the high number of protected and priority species onsite and nearby this is an essential consideration. The SAC RAMSAR SSSI is functionally linked by the water systems in this site. In addition, CWSs are present within the development and adjoining the development, notable for their aquatic species. Dust (which also have not been included in the Air quality section) could pollute the watercourses. A pollution event could have in combination impacts with other facilities in the development area and wider catchment and should be considered.

Chapter 11
It is considered that water quality issues should also be scoped into the ecological assessment chapters of any subsequent ES.

References
The Council note that the EIA Scoping Report fails to consider the useful guidance set out in Wildlife and Windfarms – conflicts and solutions, Volume 1: Onshore: Potential Effects (978-1-78427-119-0) and Volume 2: Onshore: Monitoring and Mitigation (978-1-78427-123-7) (ed. Martin Perrow). This is particularly surprising because the Applicant co-authored and sponsored the books.

Cultural Heritage and Archaeology

These responses only apply to above-ground built heritage assets within East Cambridgeshire, with the County Council to respond on below-ground archaeology – particularly the Scheduled Monument of the Round barrow off Stocking Drove, and the two Scheduled Monuments within the site inside Fenland District.

We are pleased to see the acknowledgement in section 8.3.6 of the Scoping Report that while Ely Cathedral is located outside the 10km study area, it has been identified for consideration. We would welcome discussions with the Applicant to demonstrate the visibility of the proposal from within the Cathedral grounds, and in views of the Cathedral from the east (see the landscape and visual chapter comments below).

We question why the wording is different in table 8.2 for the "mitigation" column for grade I and II* buildings with two bullet points, compared with grade II buildings with three bullet points.

With no details on the intended grid connection route and form, the Council cannot comment on the heritage topic scoping of this aspect. Please note, that there may be further specific heritage comments the Council would have wished to make, but our Conservation Officer is currently unavailable to do so. We would therefore encourage the Applicant to engage with the Council outside of the formal EIA Scoping process.

Landscape and Visual

Paragraph 9.3.42 refers to Ely Cathedral as a heritage attraction and promoted viewpoint, and views of the Cathedral from the surrounding area form a key element of the landscape's character

and appreciation of this heritage asset. We would welcome discussions with the Applicant on the precise spot for viewpoint location 15.

The proposed assessment viewpoints do not include any to the east of Ely to capture the view of the Cathedral with the proposed turbines behind. With the importance of Ely Cathedral to the character of the Fen landscape, and the theoretical visibility of the turbines from the east of the city suggested by figure 9.7, we ask that a further viewpoint be included to show the view looking west towards the Cathedral with the proposed turbines behind it, to inform both the landscape and heritage impacts.

No grid connection corridor, information on any overhead lines, nor ZTVs are provided to allow the Council to comment on the scoping of its landscape and visual impacts. The Council would like to see that this element of the ES is fully considered and not treated as a secondary matter to the main development itself. This is noting that if there are to be overhead lines, the corridor is likely to have long-lasting visual impacts, with limited options for successful mitigation. Finally, the Council is also intending to seek specialist further inputs on landscape and visual matters and would again encourage the Applicant to engage with the Council outside of the EIA Scoping process.

Shadow Flicker

We ask that the newly opened Lake View Bereavement Centre on Chatteris Road is considered for inclusion (depending on the orientation of its windows relative to the proposed turbines) as a sensitive receptor.

Hydrology, Hydrogeology, Geology and Peat

Parts of the site are within areas of groundwater vulnerability (such as around North Fen, and Sutton Fen) and we agree it is appropriate to have groundwater quality scoped in. Chapter 11 does not appear to reference how much of the site within ECDC is within the Mineral Safeguarding Area and allocated in the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021). We note that an outline Peat Management Plan (OPMP) will be submitted with the application.

Climate Change and Greenhouse Gases

In respect of the issue of ‘Peat’ as presented within Chapter 11, the Council agree that this should be ‘scoped in’ to the estimate, although we do not presently agree with the ‘potential impact pathway’ description of ‘limited impact during operation’. The operation of the turbines has the potential for excess drying of the land, causing degradation of the peat (should peat be present). Nevertheless, it is noted that peat is ‘scoped in,’ which is agreed. The Council note the potential scope for the climate release of GHG from drying of peat soil, the microclimatic changes that occur in wind farms areas, and the possible increase in night temperature caused by wind turbines in a drought sensitive and peat sensitive soils. This should be considered in the ES Chapter, alongside the potential for accelerated moisture loss on soil and any associated impacts that can have on agricultural crops water supply for such crops during operation.

Finally, we would also clarify that peat soils can also ‘carry’ noise and vibrations much further than other soils, and we would recommend that this be appropriately considered within the Noise and Vibration assessment.

Traffic and Transport

The Council defers to the County Council as local highway authority, but notes that section 13.3.1 does not refer to Cambridge County Council highway information.

We ask that the DCO application and assessment detail whether the abnormal loads crossing the district require works to the roads and roundabouts, or further tree removal outside the application site within the ECDC area. Vattenfall's Scoping Report for the Redmere project includes such highway works diagrams in its Appendix A, but the Chatteris report does not, suggesting no off-site works are needed.

The ES needs to be clear on the likely impacts to the public rights of way which either run through the site or alongside the site on the north side of Long North Fen Drove (e.g. at Short North Drove and Blockmoor Drove), and scoping in the impacts on PRoW uses in tables 13.1 and 13.2 is welcomed.

Noise and Vibration

We note that the EIA will include a Noise and Vibration Assessment to identify and evaluate the likely significant effects of the proposed development on noise sensitive receptors during the construction, operation, maintenance, and decommissioning phases. The newly opened Lake View Bereavement Centre is not listed as a noise sensitive receptor for figure 14.1 but is a place of work and forms a public outdoor facility.

There is an existing BESS site within the district and others which have passed through the planning system in recent years. A key component of these applications has been a noise management plan which sets out routine monitoring of the site (such as once a year) and a robust complaints procedure which may involve acoustic measurements. We would ask this to be incorporated as the proposal progresses. From reading the methodology of assessing operational noise from the BESS it does not appear to reference low frequency noise, which would need to be included.

The Council's Environmental Health Officer welcomes the provision of a Construction Environmental Management Plan and Operational Environmental Management Plans.

We will expect the core working hours to comply with the Council's guidance for noise and noise nuisance, which generally seeks the following:

- Monday to Friday: 7:30am to 6pm
- Saturday: 7:30am to 1pm
- Sunday: No noisy work at all.

Socioeconomics, Tourism, Recreation and Land Use

At this stage we cannot agree with Table 15.2 scoping out "Agricultural land and farm holdings" during operation, as further information is needed. Clarification of how much agricultural land is to be impacted and how much would remain in agricultural use during the construction; operational

and decommissioning stages of the project is needed. We would suggest the Land Use Framework for England (March 2026) be referenced in Appendix B chapter 11's legislation, policy, and guidance section.

This chapter does not mention the number of construction workers, nor their likely demand for accommodation in the local area. Further information on these aspects would be welcomed. The Council's Economic Development Officer also offers the following comments.

Regional Labour Market Competition and Recruitment Risk

The East of England is currently an infrastructure hotspot, creating a highly competitive landscape for construction recruitment. Developing the two schemes and associated grid connections could face severe delivery risks due to overlapping workforces.

According to Skills England and CITB data, based on those leaving the profession versus those entering the profession by 2035, the UK construction sector faces more than 140,000 unfilled vacancies and needs roughly 47,000 additional workers annually, heavily driven by energy and net-zero commitments. The ES will need to demonstrate as to how these challenges will be met and mitigated.

Potential Impact on Tourism and LVEP Status

The Cambridgeshire and Peterborough region was officially awarded Local Visitor Economy Partnership (LVEP) status by VisitEngland. This accreditation gives the region a unified national voice and access to targeted government backing, with a strategic goal to triple the size of the visitor economy by driving multi-day tourism into rural assets. Large-scale energy infrastructure along the Chatteris-to-Burwell corridor intersects directly with the LVEP's brand strategy and local tourism assets across four key areas:

Potential Conflict with the Emerging Regional Brand

The LVEP is actively rolling out a new regional identity: 'Visit Cambridgeshire – Wonder Further'. This brand heavily promotes the distinct, unspoiled, and expansive flat landscapes of the Fens. Introducing prominent overhead grid lines or expansive substation extensions could visibly industrialize rural vistas, directly conflicting with marketing campaigns designed to draw visitors into tranquil, open scenery.

Disruptions to Key Tourism Assets & Landscape Pacing

The LVEP's Destination Management Plan (DMP) emphasizes a joined-up approach to moving visitors smoothly between regional hubs. Major civil works crossing rural arterial roads (like the A10 or A142) could cause prolonged traffic delays, deterring day-trippers traveling between Cambridge and Ely Cathedral ('The Ship of the Fens').

Impact Upon Active Travel and Eco-Tourism Initiatives

Local authorities have prioritised substantial active travel infrastructure, including the Greater Cambridge Greenways and the Lodes Way eco-tourism trails around Burwell. Underground cabling along these narrow corridors could lead to long-term closures or diversions of cycling and walking networks, directly undermining the LVEP's core strategic pillars of accessibility and sustainable tourism.

Impact Upon the Business Event Economy

Through groups like Meet Cambridge, LVEP status is actively being used to attract lucrative international corporate conferences and business events to the region. A major goal is to encourage business delegates to extend their stays by exploring rural Cambridgeshire. Visible industrialisation along the Fenland periphery could have the potential to negatively impact the region's appeal as a high-end leisure add-on.

As such, based on the above factors, the Council would ask that the Applicant consider the following:

- *Prioritise Underground Cabling*: Avoiding overhead lines entirely along the corridor to preserve the visual integrity of the 'Wonder Further' landscape.
- *Ensure Zero-Impact Buffer Zones*: Implementing strict Horizontal Directional Drilling (HDD) parameters around eco-tourism assets like Wicken Fen and the active Lodes Way trails.
- *Offer Tourism Offsets*: Providing community gains that enhance LVEP goals, such as funding new local walking/cycling paths alongside the cable easement to support the regional Destination Management Plan.

Finally, the key to Appendix A figure 15.2 appears to be wrong way around suggesting most deprived wards for what are likely to be the least deprived and vice versa.

Aviation, Radar, and Telecommunications

No comments.

Other Environmental Topics (human health, air quality, major accidents, forestry, waste, transboundary effects)

The Council has published its Air Quality Strategy for East Cambridgeshire 2024-2029, and annual status reports which could usefully be considered and referenced in the Appendix B chapter 13 legislation and policy section.

The Council notes that table 17.1 refers to underground cabling for the BESS and grid connection. As no information on the grid connection has been provided and the undergrounding of cabling does not appear to be guaranteed (being a project delivered by others), the Council considers it is premature to scope out any likely impacts from the grid connection.

The BESS location within the site has not been shown in the Scoping Report and paragraph 17.3.7 does not state when the Battery Safety Management Plan would be provided (we would ask for it with the DCO submission itself). The Council welcomes this as a detailed technical document but questions the proposed scoping out of major accidents and hazards in general from the ES.

Turning to specific matters in relation to major accidents and hazards, we would refer to Table 17.37 BESS/Turbine fires and the impact on highly flammable peat and proximity to agricultural crops such as cereals should be scoped in. This is not only a fast burning fast spreading fire risk to human health, internationally important wildlife and significant release of carbon storage issue, peat burns underground and can remain active for years undetected. Fires can and do remerge anywhere sometimes a considerable distance from the fire's starting point. There remains the increasing likelihood of wildfires due to climate change which are a risk to the site.

Furthermore, wildfires in peatlands are very difficult to extinguish and there has been an increase in the frequency and scale of such fires in recent years. A recent fire at Holme Fen Nature Reserve near Peterborough burned for 31 days. Ground gases from underlying peat strata, including methane, can accumulate in buildings and other structures posing a risk of fire or explosion. The EIA Scoping Report states that risks of potential BESS battery fires due to thermal runaway are low and can be mitigated by management plans. However, these risks need to be considered in the context of the added risk of peatland fires. Peatland fires and BESS battery fires were they to break out have the potential to impact air quality and cause land and water contamination. Furthermore, Table 11.1 identifies Peat as a receptor and the potential impacts from excavation, compaction, degradation, or loss. Loss and damage from fire could be added to this list. Consideration needs to be given to these risks.

Cumulative Effects

Section 18.2.2 refers to other existing, consented, under construction and reasonably foreseeable developments. The Applicant will therefore need to conduct regular updates of the planning application searches and other publicly available information for emerging schemes, especially other NSIPs, to consider for cumulative impacts during construction and operational phases.

To provide some examples, Figure 18.1a does not appear to refer to Anglian Water's Fen Reservoir project north of Chatteris. Figure 18.1b lists at numbers 98 and 99 the same scoping reference – there is a current application ref. 26/00753/ESO at this site. Location 105 has its current planning application under consideration, ref. 26/00011/FUM at Wisbech Road, Littleport. Major schemes at The Shade Soham ref. 26/00367/FUM, Snoots Bridge ref. CC/26/091/FUL and Lancaster Business Park ref. 26/00237/ESO (which Planning Committee resolved to approve on 7/10/26) should also be considered for the cumulative long list. The permission for the Lake View Bereavement Centre adjacent to the site is not listed, presumably as it is considered a completed development for the baseline assessment.

Other Matters

The Council defers to Cambridgeshire County Council regarding specialist advice on water/flood risk, archaeology, traffic and transport, human health, and waste and minerals, and defers to Fenland District Council for any matters within or affecting land within its administrative boundary.

Yours sincerely,

[redacted]

Major Projects Planning Officer
Planning Department
East Cambridgeshire District Council

cc: [redacted], Strategic Planning & Development Management Manager (ECDC)

creating a better place
for people and wildlife

Environment Agency

Planning Inspectorate

Reference: OR-0013103/01
Your reference: EN0110041

26 October 2026

Dear Sir/Madam

EIA Scoping Opinion Consultation

Chatteris Wind Farm

Dear Planning Inspectorate

Thank you for your consultation on the Scoping Report, submitted under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in support of the Application by Vattenfall Wind Power Limited for an Order granting Development Consent (DCO) for the Chatteris Wind Farm. This consultation was received on 29 September 2026.

We have reviewed the main text, accompanying figures and appendices, and can provide the following advice in relation to matters within our remit.

We must 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. These are as follows:

- Biodiversity:
    - Invasive Non-Native Species (INNS) are not listed as a receptor to be scoped in.
- Fisheries:
    - Construction noise impacts on fish are not listed as an impact pathway.
- Groundwater and contaminated land:
    - Public water supply: all phases.
    - Quarries: all phases.
    - Land contamination: operation and maintenance.
    - Groundwater Dependent Terrestrial Ecosystems: operation and maintenance.

    - Thermal impacts from buried high-voltage cables on groundwater receptors, Groundwater Dependent Terrestrial Ecosystems and peat: operation and maintenance.
- Water quality:
    - Fire risk is not clearly scoped in, and Major Accidents and Disasters Assessment scopes out a battery fault during operation: operation and maintenance.
    - Foul water and the risk from sewage discharges are not clearly scoped in: all phases.
    - Leakage or spills of oils, fuels and chemicals are scoped out of the Major Accidents and Disasters assessment: all phases.
- Water resources:
    - Water availability (public water supply): construction and decommissioning.

Please note this review is on the EIA process only. Other assessments required such as Flood Risk Assessment (FRA), Habit Regulations Assessment (HRA) and Water Framework Directive (WFD) have not been included. We would recommend the Applicant consult us on the scopes of these studies in due course.

The structure of our response is as follows:

Appendix A - Detailed Comments on the EIA Scope
Appendix B - Additional advice to the Applicant
Appendix C - Informatives

We have provided our commentary on issues that have been scoped in or scoped out for assessment under Appendix A. Under Appendix B, we have sought to identify key issues early and provide proactive advice on the mitigation measures and commitments we would expect to see later in the process. We recognise that the level of detail available at this stage is limited.

Please note this response does not represent our final view in relation to any future Development Consent Order (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.

If you have any questions regarding our response, please contact NIteam@environment-agency.gov.uk.

Yours sincerely,

[redacted]
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2 Marsham Street, London, SW1P 4DF

Appendix A – Comments on the EIA scope

Biodiversity

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 6, Table 6.3	
Issue	INNS are not listed as a receptor to be scoped in.
Impact	The Applicant may risk breaching the WCA if measures aren't enacted to control and manage any INNS on-site, or to prevent the accidental spread of INNS.
Solution	List invasive species under table 6.3 and scope in for assessment for all phases. An invasive non-native species management plan will be required as part of the Environment Statement, along with proposed measures for biosecurity. A pathway specific risk assessment should be considered, identifying any pathways for spread during construction, operation and decommissioning. Amend the Commitments Register to commit to the production of an INNS management plan or biosecurity plan. As Water Voles are recorded on-site, we would recommend that American mink are controlled as part of INNS management.
Additional advice: It is an offence under Section 14(1) of the WCA to release, or allow to escape from captivity, any animal (listed in Part I of Schedule 9 of the Act) to a place outside its native range; or otherwise cause any animal beyond the control of any person to be at a place outside of its native range. It is an offence under Section 14(2) of the WCA to plant or otherwise cause to grow in the wild any plant listed in Part II of Schedule 9 to the Act.	

Fisheries

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 6, Table 6.3	
Issue	Construction noise impacts on fish are not listed as an impact pathway.
Impact	Certain construction noise, such as piling, can cause impacts to fish, such as permanent injury or mortality as well as behavioural impacts.
Solution	Further justification is required if this impact-pathway is to be scoped out.

Additional narrative/explanation:
Mitigation may include avoiding percussive piling methods and/or avoiding sensitive times of year for fish such as spawning and key periods of migration.

Where this impact-pathway does exist, then it should be included in the assessment and assessed according to the sound exposure guideline set out in Popper *et al* (2014) Sound Exposure Guidelines for Fishes and Sea Turtles: A Technical Report prepared by ANSI-Accredited Standards Committee S3/SC1 and registered with ANSI.

The Overarching National Policy Statement for Energy (EN-1) states the following:

- 5.4.18 – "Where the development is subject to EIA, the Applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England and Wales), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats."
- 5.4.23 - "The design of energy NSIP proposals will need to consider the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure."

Groundwater and contaminated land

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Tables 11.1 and 11.2, Paragraphs 11.3.26 and 11.5.2	
Issue	Public water supply is scoped out for construction and decommissioning, and for operation and maintenance. The Applicant has not yet obtained information about public or private water supply abstractions.
Impact	Without information about the presence or absence of existing water supply abstractions, it is not possible to say there is no risk.
Solution	Scope in public water supply, or present further information to demonstrate appropriate searches have been made to support this conclusion.

Additional narrative/explanation:
The statement in Table 11.1 "The Site does not drain into a public water supply catchment" is not supported by information given in the report.

In paragraph 11.3.26, the Applicant identifies relevant Information Requests which are yet to be submitted. We expect this information to be obtained and reviewed prior to such scoping decisions being made.

The Overarching National Policy Statement for Energy (EN-1) states:

- 5.16.7 – "The Environmental statement should in particular describe existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance."

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Tables 11.1 and 11.2, Figures 1.2 to 11.5	
Issue	Mines and quarries are scoped out for construction and decommissioning, and for operation and maintenance. However, historical and active quarries are present within and immediately adjacent to the Order Limits.
Impact	Risks and interactions would not be appropriately considered. Therefore, mobilisation of contaminants may occur, which may risk pollution of controlled waters.
Solution	Scope in quarries.
Additional narrative/explanation: In Table 11.1, the Applicant states: "No historic or active mines or quarries have been identified within the Site based on the information reviewed at this stage." We are not satisfied the Applicant has reviewed sufficient information to make this scoping decision. "Sand & Gravel Pit" is clearly shown on the site drawings in this location (see Appendix A, for example, Figures 11.2 to 11.5). See also BGS GeoIndex, where data about mines and quarries can be viewed.	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Tables 11.1 and 11.2	
Issue	Land contamination is scoped out for Operation and Maintenance.
Impact	The potential need for penetrative works during the Operation and Maintenance Phase can't be ruled out; for example, repairs to, or emergency re-routeing of, cables or drainage. There's potential for encountering land contamination with no strategy in place for actions to take.
Solution	Scope in for both phases. Complete suitable land contamination risk assessments.
Additional narrative/explanation:	

Land contamination is scoped out of the Operation and Maintenance phase (Table 11.2). No relevant information about current or historical land use, or the potential for encountering contamination, has been presented to date. The justification is that suitable measures would be secured in the Operational Environmental Management Plan (OEMP). This might be acceptable in principle, but risks cannot be appropriately mitigated without further investigation into their likelihood and distribution. We consider that unplanned penetrative works during maintenance might involve excavation in areas not previously accessed.

The potential need for penetrative works during the Operation and Maintenance Phase can't be ruled out; for example, repairs to, or emergency re-routeing of, cables or drainage. We consider that unplanned penetrative works during maintenance might involve excavation in areas not previously accessed.

No land contamination assessment has been provided with the scoping report, and we have not identified any proposal to complete one. We expect land contamination assessments to follow the tiered approach laid out in our Land Contamination Risk Management (LCRM) guidance. The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas), an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks. Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with BS 5930: Code of practice for ground investigations and BS 10175: Investigation of potentially contaminated sites – code of practice. Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.

None of these guidance documents are referenced in Appendix B Chapter 7. We would expect to see them listed here. There does not appear to be anything directly relating to hydrogeology in this list.

The scope of the desk study outlined in Appendix C Chapter 7, paragraph 7.1.3 does not include current and historical potentially contaminative land uses. We would expect to see these included. Additionally, there is no indication that the conceptual site model noted in Appendix C Chapter 7, paragraph 7.1.4 would be in accordance with our LCRM guidance. We consider that it should be.

The Overarching National Policy Statement for Energy (EN-1) states:

- 5.11.17 – "Applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination."
- 5.11.18 – "For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination, and where contamination is present, applicants should consider opportunities for remediation where possible. It is important to do this as early as possible as part of engagement with the relevant bodies before the official pre-application stage."

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Table 11.2	
Issue	Impacts on Groundwater Dependent Terrestrial Ecosystems (GWDTE) are not scoped in for the operation and maintenance phase.
Impact	Operational impacts on the designated GWDTE will not be adequately assessed. Fires at the Battery Energy Storage System (BESS) during the operation and maintenance phase could pose a risk to controlled water, if appropriate drainage and fire water containment measures aren't in place. Therefore, GWDTEs can be affected by contamination of linked groundwater.
Solution	Scope in GWDTE for the operation and maintenance phase.
Additional narrative/explanation: The scoping conclusion contradicts statements made elsewhere. A designated GWDTE (Ouse Washes SSSI) is present within the study area. The justification given in Table 11.2 is: "Due to the low hydrological potential of the bedrock, it is unlikely that GWDTEs are present on Site." This contradicts the assessment in Table 11.1, where GWDTEs are scoped in for construction and decommissioning ("The presence of permeable bedrock and superficial deposits indicates that GWDTEs may be present within the Site").	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Tables 11.1 and 11.2	
Issue	The report does not consider potential thermal impacts on groundwater receptors, including GWDTEs and peat, from buried high-voltage cables.
Impact	Impacts on sensitive groundwater receptors, including hydraulically connected surface water bodies, GWDTEs and abstractions, may not be identified and mitigated. Thermal emissions could also affect peat stability and release peat-bound pollutants to groundwater and surface water. This will cause a deterioration in water quality.
Solution	The Applicant should scope in thermal impacts on groundwater receptors,

	GWDTEs and peat deposits.

Additional narrative/explanation:

Heat was introduced as a groundwater pollutant in 2023 through the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 (SI 2023/651):

““pollutant”, in relation to England, means any—

a) substance,

b) heat, or

c) biological entity or micro-organism,

which is liable to cause pollution;”

Work is being undertaken on groundwater heating from ground source heating and cooling systems, but there is currently no guidance specifically addressing the potential thermal implications of buried high-voltage electricity cables.

The Environment Agency Chief Scientist’s Group report for Ground Source Heating and Colling (GSHC) systems, *Environmental Impacts of Temperature Changes from Ground Source Heating and Cooling Systems*, defines a thermal plume as the area around a GSHC system experiencing a temperature change of 1°C or more. Although that study is not directly applicable to underground cables, an equivalent benchmark could be considered when assessing heat pollution from buried high-voltage cables.

The Chief Scientist’s Group identifies groundwater flow and bulk thermal conductivity as key influences on thermal plume development. Impacts may arise directly through temperature changes and indirectly through effects such as changes in water chemistry.

Thermal emissions from buried high-voltage cables in contact with peat deposits may cause local heating and degradation. This could result in ground stability issues and the release of previously peat-bound pollutants, affecting groundwater and surface water quality.

Water temperature is a physico-chemical quality element used to assess ecological status under the Water Framework Directive (WFD). The WFD assessment should therefore consider whether heat from buried cables could alter the thermal regime of hydraulically connected groundwater (and surface water bodies), and therefore causing deterioration, or the prevent achievement of improved water quality.

The potential thermal implications of buried cables for groundwater, GWDTEs and peat deposits therefore require further consideration.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraphs 2.4.9 to 2.4.12	
Issue	The decommissioning proposals as set out in paragraph 2.4.10 include the potential retention of buried cables.
Impact	Buried cables left in-situ following decommissioning pose an ongoing pollution risk to peat soils and controlled waters.
Solution	If buried cables are to be retained in-situ, the Applicant should demonstrate that they would not pose a significant risk to peat soils or controlled waters via degradation, or damage from future agricultural and other activities.
Additional narrative/explanation: Following decommissioning, any electrical cables present within potential ploughing depth on future agricultural land would be at risk of mechanical damage. This could result in the accelerated release of pollutants including microplastics into the environment from these cables. It may also cause damage to agricultural equipment. While sealing and securely burying underground cables can minimise the risk of contamination over short- to medium-timescales, if left in-situ indefinitely these will ultimately deteriorate and release contaminants into the subsurface environment. It would be prudent to design with decommissioning in mind, as the most practical method of construction could mean the most effective decommissioning technique becomes less viable.	

Water quality

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.4.1, Tables 11.1 and 11.2. Chatteris Wind Farm EIA Scoping Report, Chapter 17, Paragraph 17.3.7, and Table 17.3	
Issue	Fire risk is not clearly scoped into Chapter 11 as it is not listed as a potential impact in section 11.4.1. Table 17.3 Major Accidents and Disasters Assessment scopes out a battery fault during operation, which could result in fire or thermal runaway, on the basis that there will be a Battery Safety Management Plan (BSMP). However the proposed mitigation measures have not yet been reviewed, and the fire risk associated with turbines and substation have not been identified.

Impact	Firewater could pose an unacceptable risk to the water environment receptors during operation, and will deteriorate water quality unless it is contained and removed sufficiently.
Solution	The Applicant should specifically scope in the risk from firewater from turbine fire (associated with lightning strike or electrical equipment failure), and electrical equipment at BESS and substations.

Additional narrative/ explanation:
Whilst we see Table 11.1 and 11.2 scopes in Watercourses receptors for all phases, the 'Potential Impact Pathway' does not clearly identify risk from fires.

It says that there will be a Battery Safety Management Plan (BSMP), however any measures detailed have not yet been seen, so we lack confidence that certain risks of deteriorating the water quality of the water environment will be sufficiently mitigated.

The drainage system should be set up in such a way that allows for them to be closed off from the environment in the case of fire, using an automatic penstock valve. A manual override system should also be included as part of the automated penstock valve. Sufficient storage for fire water should also be provided.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.2.18 and 2.2.26, and Table 2.1
Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.4.1, and Tables 11.1 and 11.2

Issue	Foul water risk is not clearly scoped into Chapter 11 as it is not listed as a potential impact in section 11.4.1. Temporary construction compounds and On-site substation compound will have welfare facilities, but there is no discussion of where sewage derived from the compounds will be discharged, i.e. if will they go to sewer, discharge to ground or surface or be tankered away.
Impact	Foul water could pose a risk to the water environment receptors during all phases. If the discharge cannot be made to a sewer, it could pollute controlled waters if released to the ground or a watercourse without suitable treatment and a proper assessment of its potential impacts.
Solution	Foul drainage should be scoped in for all phases until containment and disposal method is finalised.

Additional narrative/ explanation:
The Applicant should be aware they may need a water discharge activity permit: Discharges to surface water and groundwater: environmental permits - GOV.UK

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.4.1 and Tables 11.1 and 11.2. Scoping Report, Chapter 17 Other Environmental Topics, Paragraph 17.3.10 and Table 17.3	
Issue	Leakage or spills from oils, fuels and chemicals will be scoped out for Major Accidents and Disasters Assessment given that there will be a Pollution Prevention Plan, CEMP and DEMP, however mitigation measures have not been able to be reviewed.
Impact	Any measures detailed have not yet been seen so we lack confidence that certain risks of deteriorating the water quality of the water environment will be sufficiently mitigated.
Solution	This needs to be scoped in for Major Accidents and Disasters Assessment until mitigation plans can be reviewed.
Additional narrative/ explanation: We acknowledge that "accidental spills and leaks of oils, fuels and other chemicals" is included in section 11.4.1, and that Table 11.1 and 11.2 scopes in Watercourses receptors for all phases, with the 'Potential Impact Pathway' including Changes to surface water quality.	

Water resources

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Table 11.1	
Issue	Water availability (public water supply) has not been scoped in for further assessment, despite the consumptive water demands of the proposal not being identified.
Impact	The sources of supply available to the project have not been appraised. Water may not be available to supply aspects specifically during the construction phase which include (but are not limited to): • Potable supply for welfare/domestic use; • Dust suppression; • Concrete batching; • Wheel/plant machinery washing; • Horizontal Direction Drilling (HDD) fluids if employed for cable laying
Solution	The ES should include a water supply strategy which quantifies consumptive water demands, and provides an options appraisal of sources of supply available to the project. This should identify opportunities and acknowledge limitations which need to be evaluated ahead of detailed design.

Additional narrative/ explanation (if necessary)

The Overarching National Policy Statement for Energy (EN-1) states:

- 5.16.7 - "The Environmental statement should in particular describe existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance."

The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification (https://www.gov.uk/government/publications/water-stressed-areas-2021-classification). Developments have the potential to increase demand for supply and result in increased abstraction from water company groundwater sources.

Anglian Water Servies (AWS) who supply the region the project is within, has adopted a "Non-Domestic Water Requests Policy" for which it asks of applicants who require non-domestic water supply to complete a Water Resource Assessment to understand water demands, water efficiency measures and to effectively forecast water supply requirements. We advise that the applicant engage with AWS to ensure that supply can be achieved for the development's needs.

Water resource availability in the fenland areas of East Anglia is finely balanced. Operational retention levels in drains and high-level carriers are maintained to serve ecology, navigation, and irrigation demand. These demands mean that water is not available for new licensing in the summer, and existing abstraction is frequently restricted during peak summer temperatures, prolonged dry weather and drought.

The Environment Agency seeks assurance that a practical and sustainable water supply can meet the project's consumptive demands throughout its lifetime. This will help precent post-consent problems that could cause costly delays, or compromise the scheme's viability.

Appendix B - Additional advice to the Applicant

General

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 18, Figure 18.1a and Appendix A	
Issue	The application numbers listed on this figure only seem to be those of Town and Country Planning Act applications. The Fens Reservoir DCO proposal is situated near Chatteris directly to the north of this proposal's development order limits.
Impact	There are likely to be multiple cumulative effects as a result of Fens Reservoir and this proposal both at construction and operation phases.
Solution	The Cumulative Effects chapter must also include Development Consent Order applications, including The Fens Reservoir DCO.

Biodiversity

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.2.22	
Issue	Proposed options for watercourse crossings include culverting.
Impact	Culverting results in the loss of aquatic and riparian habitat, contributes to fragmentation of the remaining habitat network and impacts on fish migration.
Solution	Clear-span bridges should be considered if crossings are required across wet (i.e. non-ephemeral) watercourses, as these maintain habitat connectivity, allow species (such as otters) to commute freely and allows free fish passage. We strongly encourage removal of any existing culverts to further enhance watercourses.

Additional narrative/explanation:

If culverting is necessary, then we would recommend a culvert that is as short as possible. Their design should avoid and mitigate impacts to biodiversity, for example, 3-sided and arched culverts. The culvert should have a mammal ledge with ramps incorporated into the design, to ensure connectivity of riparian habitat by allowing otter to pass watercourse crossings.

Reinstatement of bankside habitats along watercourses and ditches should be considered after completion of works. This could include sowing the bankside habitats with a species rich locally appropriate sward, and erecting fencing to prevent livestock access.

The developer must share details of where any watercourse crossing will take place and how they will be designed to ensure impacts on aquatic and riparian habitats is negligible.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraphs 2.4.3 and 2.4.4	
Issue	Construction is estimated to take 24 months. The Applicant states that pre-construction checks will be conducted, but does not provide detail on how far in advance of construction these will take place.
Impact	Changes in the baseline of species presence and distribution could be missed without adequately timed pre-construction checks.
Solution	A pre-construction otter and Water Vole survey should be conducted at least 3 months prior to the start of works. If new holts/burrows are identified, suitable mitigation should be put in place to mitigate for the feature.

Additional narrative/explanation:

Pre-construction checks/surveys should be conducted prior to construction, to determine any changes in presence or distribution of species. Pre-construction checks should especially be undertaken at watercourse crossing points, even if no places of shelter (e.g. otter holts or Water Vole burrows) have been found.

For example, Otters are highly transitory species, therefore an otter could construct a holt prior to or during construction. This may result in damage or destruction of holts or disturbance during construction, which are offences under the Conservation of Habitats and Species Regulations 2017 (as amended).

CIEEM's Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey.

The National Policy Statement for Renewable Energy Infrastructure (EN-3) states:

- 2.12.46 - "Applicants should set out environmental monitoring plans (e.g., bird and bat surveys) for the site prior to and during construction and operation."

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.4.4	
Issue	Construction activities include excavating trenches to lay cables and other infrastructure.
Impact	Compounds and trenches associated with installation present a risk of entrapment of mammals such as otter.
Solution	Cover-over open trenches to prevent wildlife from falling in and place a ramp to enable wildlife to escape. Where possible, trenches should be

	excavated and closed in the same day to prevent any wildlife becoming trapped. All open trenches should be inspected at the start of each working day to ensure no animal is trapped. Securely fence compounds and trenches during construction. Use otter-proof fences to stop otters getting into the development site during and after works. Fences must be designed and erected with extreme care and attention to detail to ensure they are effective and to avoid harming otters (e.g. by leaving them trapped in a development area). Any fencing should not obstruct otters from accessing important habitat (e.g. woodland and scrub adjacent to watercourses).
Additional narrative/explanation: Otters are a protected species under the Conservation of Habitats and Species Regulations 2017 (as amended). The Overarching National Policy Statement for Energy (EN-1) states: • 5.4.36 – "during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements"	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 6, Table 6.3	
Issue	Under the 'Habitats' receptor, the mitigation states that there will be an establishment of "appropriate construction buffer zones around important habitats" but does not mention the width.
Impact	The Applicant should ensure there is a sufficient buffer between the development, any fences and any watercourse or ditch. This will allow for a natural river corridor to be maintained and free movement of riparian mammals up and down the system.
Solution	Provide a minimum buffer of 10m for main watercourses (measured from the bank-top). Amend the Commitments Register (Commitment Reference Ecol-02) to commit to a minimum buffer of 10m, from the bank-top of main watercourses.
Additional narrative/explanation: The 10m buffer includes any permanent or temporary fencing installed as part of this development as well as any permanent or temporary lighting, as this can interrupt free movement, feeding and resting. As Water Voles have been recorded on-site, we recommend that that a buffer of 5m from the toe of the bank for ditches is provided, to protect and avoid impacts on Water Vole burrows. Water Voles are protected under the Wildlife and Countryside	

(WCA) Act 1981 (as amended). The Overarching National Policy Statement for Energy (EN-1) states the following: • 5.4.36 - “during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements”

Document Reference(s): Chatteris Wind Farm Commitments Register Section: Commitment Reference Ecol-01	
Issue	Watercourse cable crossings design does not consider impacts of cable-crossing installation on riparian species such as Water Voles and Otter.
Impact	Construction works associated with installation of cabling or pipelines under watercourses can impact Water Vole burrows through noise, vibration and compaction.
Solution	Cables should be buried a minimum distance of 5m from the top of the riverbank and sufficiently deep below the riverbed to avoid impacts on Water Vole.
Additional narrative/explanation: Water Voles are protected under the Wildlife and Countryside (WCA) Act 1981 (as amended).	

Fisheries

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.3.17 and 11.3.18	
Issue	The assumption that watercourses that do not have a WFD classification are not expected to be of high quality.
Impact	The sensitivity of the receptor waterbody may be downplayed leading to more significant impacts than the assessment results in.
Solution	Assumptions made in 11.3.17 on watercourses/drains on the site should be backed up with survey data.
Additional narrative/explanation: Given the ‘good’ and ‘high’ fish status of the Counter Drain and Middle Level, the associated waterbodies and including smaller waterbodies, may also contain fish assemblages that align with these WFD statuses.	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 6, Paragraph 6.3.11	
Issue	Methodology of fish habitat assessments not detailed.
Impact	Baselines may not be sufficiently understood, which may mean impacts

	aren't sufficiently mitigated for.
Solution	The Applicant should include a method statement for this fish habitat assessment, so as to ensure a sufficient level of detail is captured providing an accurate depiction of the baseline. Furthermore, it allows the reader to understand how habitat quality has been assessed.

Additional narrative/explanation:
We are pleased to see that fish habitat assessments are ongoing/completed.

The Overarching National Policy Statement for Energy (EN-1) states the following:

- 5.4.18 – "Where the development is subject to EIA, the Applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England and Wales), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats."
- 5.4.23 - "The design of energy NSIP proposals will need to consider the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure."

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 6, Paragraph 6.3.12

Advice:
The use of eDNA to determine the presence or absence of fish can be a highly effective surveillance tool when it is applied in accordance with established best practice. To ensure robustness, eDNA sampling must be undertaken at an appropriate time of year, and with a sufficient number of replicates, to provide confidence in detection probabilities.

However, we note that there are inherent methodological limitations when eDNA is deployed watercourses, particularly where fish densities are low, populations are spatially restricted, or habitat features constrain DNA distribution. Under these conditions, the probability of false non detects increases, and sampling at sub optimal locations or collecting insufficient water volumes may further reduce the likelihood of detecting species that are present.

In view of these limitations, we request that the Applicant provides a comprehensive and justified sampling strategy. This should include:

- Clear methodology describing sampling protocols, laboratory methods, contamination controls, and QA/QC procedures.
- Proposed sampling locations, with rationale demonstrating that site selection

reflects habitat variability, and the known or expected distribution of target species.
- Water volumes and number of replicates, with justification referencing detection probabilities and relevant guidance.
- Temporal considerations, including seasonality and flow conditions.

We further request explicit detail on how uncertainty will be assessed and reported. In particular, the methodology should set out the interpretive framework for non-detect results. A “no detect” outcome must not, in isolation, be treated as conclusive evidence of species absence. Instead, uncertainty should be considered and integrated into the assessment, with clear thresholds for when additional survey effort or complementary methods (e.g., conventional fish surveys) would be required.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 6, Table 6.4
Advice: PINs advice is that where proposed electrical cables are over 132kV, an Electro Magnetic Field (EMF) assessment should be provided in an appendix to the Environmental Statement. We note that the connection to grid cable corridor is a separate application, but this may need to be considered. Where cables greater than 132kV are proposed to cross under main rivers, then a risk assessment on the impact to fish should be included in this appendix. See PINS guidance here - Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development - GOV.UK

Groundwater and contaminated land

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapters 2, 11, 17 and Commitments Register	
Issue	The Applicant proposes to site a substation and a BESS compound within the Turbine Area. Currently, no drainage strategy is proposed for the scheme.
Impact	If there is insufficient mitigation, BESS compounds and substations may pose a significant risk of impact to controlled waters in the event of a fire.
Solution	The Applicant should commit to a drainage strategy for the BESS and substation compounds, incorporating measures to prevent release of contaminants via runoff in the event of a fire.
Additional narrative/explanation:	

Some risks relating to the BESS are mentioned in the scoping decision for Land Contamination in Table 11.2. See our comments relating to this scoping decision in appendix A.

Production of a Battery Safety Management Plan is confirmed in 17.3.7 and the Commitments Register (Oth-07). However, these sections do not specifically mention drainage and capture of fire-impacted runoff as a method of control.

We request that any proposed BESS in this development should have a sealed drainage system in place, to adequately contain and manage any fire-fighting effluent or contaminated surface waters generated by a fire at the site. This will ensure that there is no discharge of polluted water to ground or surface water bodies. The adoption of an infiltration solution for surface water drainage at any BESS would not be acceptable.

Receptors in the vicinity of the BESS are scoped out of the Major Accident and Disaster (MAD) assessment (Chapter 17.3). This is only acceptable providing risks are assessed and mitigation is detailed elsewhere.

Any BESS compound and substation compounds should be preferentially sited away from sensitive, controlled water receptors. We request that these features are not sited in areas of bedrock principal aquifer.

Any mitigation proposed to be implemented at the BESS should also be sufficient to prevent impacts on groundwater, and surface water quality, in the reasonable worst-case event of a combined flood event and catastrophic BESS fire.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.2.1

Issue	Inadequate proposed search area for land contamination.
Impact	Off-site sources and receptors may be missed.
Solution	Include an appropriate off-site search radius.

Additional narrative/explanation:

The Applicant proposes to only consider land within the Indicative Order Limits for the assessment of contaminated land. We disagree with this as off-site sources and receptors could be in connectivity with the site, especially through surface water and groundwater.

We would be satisfied with a 2km search radius from the Indicative Order Limits. This is proposed as the Hydrology, Hydrogeology, Geology and Peat Study Area. Any lesser distance should be clearly explained and justified.

See also our comments on Land Contamination scoping regarding the operation and maintenance phase.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraphs 11.2.1 and 11.3.1; Appendix C, Chapter 7, Paragraphs 7.1.2 to 7.1.4	
Issue	Insufficient discussion of geological and hydrogeological setting.
Impact	Risks may be insufficiently understood, characterised, or mitigated.
Solution	Complete a detailed review of the geological and hydrogeological setting as part of the ES.
Additional narrative/explanation: For example, the data sources listed as 11.3.1 includes Environment Agency: Drinking Water Safeguard Zones and Source Protection Zones. We have identified no discussion of the review of these data sources in the report. Paragraphs 11.3.8 to 11.3.13 are an overview of the geological and hydrogeological setting, but they do not include comment on findings from all data sources listed.	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraphs 11.3.1 and 11.3.6; Appendix A, Figure 11.3	
Issue	Map in Figure 11.3 is not the England Peat Map 2025 as cited in the data sources for the chapter and discussed in the text.
Impact	Figure does not represent the cited data and cannot be verified.
Solution	Correct Figure 11.3 and the text referring to it.
Additional narrative/explanation: The England Peat Map 2025 (reference 67, document page 268) does not categorise peaty soils as deep or shallow.	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.5.3	
Issue	Probing exercise completed to date was not sufficient to estimate peat volume on site.
Impact	Impacts on carbon assessments and peat management plans.
Solution	Explorative coring to confirm the results of the peat probing. This should not seek to replicate the 100x100m grid but should target areas where excavation works are likely to take place.
Additional Comments: As the Applicant notes in 11.5.3, a history of intensive agriculture on the site could make probing unreliable and lead to an incorrect estimate of peat depths. We request that the data and results from peat probing exercise be shared with the	

Environment Agency when complete. This should include, if available, the loss on ignition data for the surface layers.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Appendix C, Chapter 7, Paragraphs 7.1.2 to 7.1.11, Table 7.1, and Plate 7.1	
Issue	Approach to assessing the sensitivity of the peatland does not adequately represent the English policy context and is flawed in understanding.
Impact	Sensitivity of peat inadequately recognised leading to underestimation of impacts and required mitigation.
Solution	Redraft sensitivity assessment considering English policy context and the ecohydrology of lowland peatlands.
Additional narrative/explanation: For example, peaty soils are defined as having an organic matter content >20% and not by depth. Recent changes to peat protection policy in England has extended protections to peat of >0.3m. Even by the older definition of 'Deep Peaty Soils' being greater than 0.4m, Plate 7.1 would not define these areas as peat. In addition, we do not agree that peat depth can be used as a proxy for understanding the hydrological functioning or integrity of a peatland or that it is part of the flood regulation benefits that peatlands provide as described in paragraph 7.1.7.	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Appendix C, Chapter 7, Table 7.1	
Issue	WFD status proposed as a measure for Sensitivity Criteria. It is not appropriate to use WFD water body status to determine the sensitivity of WFD water bodies to adverse effects.
Impact	Effects to WFD water bodies may be significantly underestimated.
Solution	Propose another measure for Sensitivity Criteria.
Additional narrative/explanation: The Applicant proposes to use WFD classification status to determine sensitivity, with 'Good' water bodies deemed High sensitivity and 'Poor' waterbodies deemed of negligible sensitivity. This is inappropriate and current status is not a measure of sensitivity. As set out in 13(1) and 13(5) of The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 the environmental objectives for WFD water bodies are to prevent further deterioration in status of the water bodies, and to protect, enhance and restore water bodies. It cannot be presumed that water bodies not achieving Good status are not sensitive to pollutants and other impacts. Preventing the deterioration of WFD water bodies and restoring WFD water bodies to 'good' status are both critical aspects.	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Appendix C, Chapter 7, Table 7.1	
Issue	Groundwater aquifers and source protection zones have not been assigned sensitivity criteria.
Impact	Applicant cannot determine an anticipated level of effect for these receptors if criteria are not defined.
Solution	Include these receptors in future revisions of this table or provide justification for their omission.
Additional narrative/explanation:	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Appendix C, Chapter 7, Table 7.1	
Issue	Use of pollution classes not recognised by the Environment Agency and not defined elsewhere in this scoping report.
Impact	Sensitivity of groundwater vulnerability cannot be independently assessed for something which is not defined.
Solution	Suggest an alternative measure for groundwater vulnerability or provide reference for the Class 1 to Class 5 system proposed.
Additional narrative/explanation: The Applicant proposes “Groundwater vulnerability to pollution Class 5” is a high sensitivity environment. Lower classes are attributed to lower sensitivities, with “Groundwater vulnerability to pollution Class 1” being a negligible sensitivity environment. We do not recognise this classification system and cannot provide comment unless a suitable reference is given.	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Appendix C, Chapter 7, Paragraphs 7.2.6 and 7.2.7; Commitments Register	
Issue	No commitment to produce a Decommissioning Strategy, a Decommissioning Environmental Management Plan, or similar document, which includes matters relating to Hydrology, Hydrogeology & Geology.
Impact	Matters covered under this topic (including groundwater and surface water) may not be suitably managed at decommissioning.
Solution	Include a commitment for these to be included in a DEMP (or equivalent).
Additional narrative/explanation: There is commitment to produce a DEMP in relation to other topics (see Commitments Register), and a decommissioning strategy is discussed in the main report Chapter 2 paragraph 2.4.10. Impacts of decommissioning on Hydrology, Hydrogeology & Geology cannot be overlooked. While a detailed methodology will not be produced until nearer the time (main report	

Chapter 2 paragraph 2.4.12), an outline and options appraisal should be considered pre-construction. It might be that the preferred method of construction prevents the method of decommissioning that would cause least harm, based on current knowledge and best practice, if this is not identified beforehand.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Commitments Register, Oth-06	
Issue	The commitment for a Pollution Prevention Plan (PPP) has not been linked to the Hydrology, Hydrogeology and Geology topic.
Impact	Potential for prevention of pollution of Hydrology, Hydrogeology & Geology to be omitted from the plan.
Solution	Ensure Hydrology, Hydrogeology & Geology are covered by the PPP.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.1	
Issue	HDD will be employed, without a commitment to develop and implement a drilling fluid breakout plan and hydrogeological risk assessment.
Impact	HDD or other trenchless installation methods could impact groundwater, surface water and peat if not suitably managed.
Solution	HDD crossings should be supported by the development and implementation of a drilling fluid breakout plan and hydrogeological risk assessment.
Additional narrative/explanation: Due to the risks both from pollution and disruption of sub surface flows in shallow groundwater and to surface controlled water, the following should be carried out for areas of the development where HDD is proposed to be used: • a hydrogeological risk assessment; • drilling fluid breakout plan; • water feature survey	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.3.32	
Issue	It is stated that no peat has been found in cores taken from the site. This is in contradiction to mapping sources. The coring results have not been shared.
Impact	Without site of the coring results, it is not possible to have confidence in the statement.
Solution	We request that the results of the coring be shared including, if available, the loss on ignition data for the surface layers.
Additional narrative/explanation:	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11
Advice: Paragraph 11.3.32 discusses the results of cores taken from site. It states that no peat has been found. This is in contradiction to mapping sources. We request that the results of the coring be shared, including if available, the loss on ignition data for the surface layers.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapters 2 and 11
Advice: The proposed foundation type for the turbines and other infrastructure is yet to be determined. As such, the use of piled foundations cannot be ruled out. Piled foundation structures may introduce preferential pathways for contaminant migration, or could connect hydraulically separate groundwater bodies. Should a piled foundation solution be required in or within influencing distance of sensitive receptors, such as GWDTEs or abstractions, a Piling Risk Assessment or Foundation Works Risk Assessment to mitigate possible impacts.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 17, Paragraph 17.5.9
Advice: The Applicant discusses the proposed fate of battery modules and associated potentially hazardous waste to be removed from site. We are satisfied with this as an initial overview, but would like to see a commitment for this to be detailed in the OEMP, Battery Safety Management Plan, Site Waste Management Plan, or a similar relevant document.

Water quality

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.2.8, and Table 2.1 Chatteris Wind Farm EIA Scoping Report, Chapter 17, Paragraph 17.5.7	
Issue	Turbines will be installed on a suitable foundation, and BESS and substations are likely to need foundations too, however, the type of material used is unspecified in Chapter 2. Section 17.5.7 says that during construction there may surplus concrete associated with turbine, BESS, substation and ancillary infrastructure foundations, but concrete management is unclear.
Impact	There is a risk to deteriorating water quality if hazardous substances during construction get into surface runoff and is subsequently

	discharged. Leachate from concrete can carry chemicals, including heavy metals, and affect the pH level.
Solution	The Applicant must confirm if there will be a concrete washout facility associated with concrete batching, and how concrete will be managed to protect water quality.

Additional explanation:

The Applicant should ensure the CEMP includes following concrete mitigation:

- Concrete/cement works should be minimised during heavy precipitation events and carried out during dry months.
- When concrete is curing, covering should be used where possible, and pre-cast units could be used where possible.
- Concrete washout facilities must be on impermeable lining, and water must be collected and not allowed to be discharged to surface waters.

We note the temporary construction compounds will have concrete batching.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraphs 2.2.18 and 2.2.22

Issue	The measures to control of surface run-off during and post construction are unclear, other than some use of SuDS at the onsite substation compound and access tracks.
Impact	Inadequately managed surface-water runoff could carry sediment, hydrocarbons and other hazardous substances into receiving watercourses, causing pollution and a deterioration in water quality. If SuDS are unmaintained debris and/or sediment could accumulate and prevent them from effectively managing drainage.
Solution	The type of SuDS and any proposed water quality treatment should be confirmed. Applicant must commit to producing a SuDS maintenance schedule, based on the CIRIA SuDS Manual.

Additional explanation:

Surface water management strategy must be suitably designed to manage the risks from sediment, hydrocarbons, and other hazardous substances which could decrease water quality if these contaminants reach receiving surface watercourses.

Surface water runoff management is essential for all phases, so a Surface Water Management Plan should be written and submitted with the DCO application, possibly appended to the CEMP.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.2.28

Issue	There is no discussion of where sewage derived from the compounds will be discharged, will they go to sewer, discharge to ground or surface, or be tankered away.
Impact	If the discharge cannot be made to sewer, and if discharged to ground or watercourse without a suitable treatment system and proper assessment as to the impact of any sewage discharge is made, then it could lead to the pollution of controlled waters.
Solution	Plan effectively where the potential discharge of sewage effluent could be required. If the discharge is not to sewer, then a sewage treatment plant and permit may be required before any discharge can take place. Consider the space required for the treatment system and discharge route. Please note that any such discharge could require a permit under Environmental Permitting Regulations (EPR).
Additional narrative/ explanation: The Overarching National Policy Statement for Energy (EN-1) states the following: • 5.16.4 – "The Applicant should make early contact with the relevant regulators, including the local authority, the EA and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements."	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraphs 2.2.29 to 2.2.31	
Issue	If borrow pits are below the water table, and therefore require abstraction and dewatering of groundwater to allow construction, then the quality of the discharge will need to be evaluated.
Impact	Groundwater even of naturally occurring quality can have a potentially detrimental effect on surface waters and can be liable to cause pollution.
Solution	The Applicant should conduct monitoring to understand the potential water quality to discharge, and carry out risk assessment. Furthermore, they should consult with the Environment Agency to see if a permit application for discharge is required.
Additional narrative/ explanation: The Overarching National Policy Statement for Energy (EN-1) states the following: • 5.16.4 – "The Applicant should make early contact with the relevant regulators, including the local authority, the EA and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements."	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.4.4	
Issue	"Site preparation and enabling works" does not include installation of

	temporary drainage and silt fencing.
Impact	If temporary drainage is not set up, but the site is cleared and vegetation is stripped, then there is a risk of silt laden water being discharged to nearby watercourses. This could result in a pollution incident.
Solution	The Applicant should include temporary drainage and silt management in site preparation and enabling works.
Additional narrative/ explanation: This is of particular importance given the number of existing drains and watercourses in the vicinity.	

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraphs 2.2.13, 2.2.18, 2.2.19 and Table 2.1	
Issue	BESS and substations will have transformers, and transformers may be externally located adjacent to the turbines. However, associated transformer bunding is unclear.
Impact	Without bunding, transformers (if they are oil insulated) could leak or spill, and hydrocarbons could all pose an unacceptable risk to the water environment receptors.
Solution	All transformers should be bunded for all phases of development. They will need to be suitable sized to contain 110% of the volume. Where they are exposed to rainwater, the Applicant must have a mechanism to remove accumulated rainwater regularly.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Appendix C, Chapter 7	
Issue	There is no mention of water quality monitoring.
Impact	If water quality monitoring is not included, then a suitable baseline of water quality data may not be captured, and any trends in water quality deterioration or improvement because of the project may not be understood.
Solution	The Applicant should commit to producing a water quality monitoring plan with pre-construction, during construction and post-construction phases. They should confirm how they intend to secure this existing monitoring commitment i.e. through the CEMP.
Additional narrative/ explanation (if necessary) We acknowledge that there will be a hydrological walkover survey of the site following design freeze. The Overarching National Policy Statement for Energy (EN-1) states the following: • 5.16.3 – "Where the project is likely to have effects on the water environment,	

	the Applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent"

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.3.1 Chatteris Wind Farm EIA Scoping Report, Appendix B, Chapter 7, Paragraphs 7.1.10 to 7.1.12	
Issue	Key sources of data for the baseline and useful guidance are missing.
Impact	If all relevant guidance is not used, assessment about the water environment may not be based on complete information.
Solution	The Applicant should use Water Quality Explorer for available data for the baseline: Map Explorer | Water Quality Explorer Section 7.1.10 could also list the CIRIA Containment systems for the prevention of pollution (C736F). Section 7.1.11 should also include this guidance: Pollution prevention for businesses - GOV.UK Section 7.1.12 should include Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK and National standards for sustainable drainage systems (SuDS) - GOV.UK

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.4.4	
Issue	The construction activities will be undertaken in a phased sequence, however the order of chronological construction is unknown. Furthermore, the establishment of site drainage is not clearly stated in the construction approach.
Impact	Without installing relevant impermeable lining, SuDS and shutoff valves prior to constructing the BESS and substation, there is a risk that in the event of a fire or pollution event any contaminated water will not be adequately isolated.
Solution	The Applicant should commit to installing suitable drainage prior to other installations.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Appendix C,

Chapter 7, Table 7.1	
Issue	We disagree with how the Receptor Sensitivity categories are defined.
Impact	If watercourses are not given a high enough receptor importance, then mitigation measures to provide protection may be inadequate. Impacts on smaller watercourses can still be non-compliance to WFD and protection should be secured.
Solution	The Applicant should increase the receptor importance, as suggested below: - Surface water classified under the WFD as 'good' is currently Medium sensitivity, but this should be High - Surface water classified under the WFD as 'moderate' is currently Low sensitivity, but this should be Medium - Surface water classified under the WFD as 'poor or bad' should not be Negligible, a watercourse with WFD status is still important and deserves adequate protection. The Applicant must also explain how they are assessing sensitivity to watercourses with no WFD designation. Even if they are unclassified, watercourses may be tributaries of WFD classified watercourses and there could be downstream effects.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Appendix C, Chapter 7, Table 7.2	
Issue	It is uncertain how the Applicant is defining the following terms in Table 7.2: - Fundamental - Long-term - Substantial but non-fundamental - Short to medium term changes
Impact	Without being able to quantify these terms, we have uncertainty that magnitude of impact criteria is correctly applied.
Solution	The Applicant must quantify how these terms are defined so that there is a clear distinction between substantial and fundamental, and medium and long term.

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Appendix C, Chapter 7	
Issue	There is no acknowledgement that discharges of construction-site drainage or groundwater may require a permit under the EPR, and would be assessed against separate criteria.
Impact	Without appropriate assessment and control:

	• silty or contaminated surface-water runoff could pollute controlled waters; • discharged groundwater could adversely affect surface-water quality, even where its composition is naturally occurring; and • sewage discharges could cause pollution. Failure to establish permitting requirements early could also delay the project.
Solution	Engage promptly with the Environment Agency to see if a permit application for any discharge from the site is required. Be clear that a discharge to a watercourse whether it is a main river, ordinary watercourse or canal, can require a permit for a discharge.
Additional narrative/ explanation: Unless exempt, a permit may be required irrespective of whether the environmental risk is classified as high or negligible. The Overarching National Policy Statement for Energy (EN-1) states the following: • 5.16.3 – "Where the project is likely to have effects on the water environment, the Applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent" • 5.16.4 – "The Applicant should make early contact with the relevant regulators, including the local authority, the EA and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements."	

Flood risk

Document Reference(s): Chatteris Wind Farm EIA Scoping Report, Chapter 11, Tables 11.1 and 11.2
Advice: It Is noted that flood risk during construction and decommissioning, and operation and maintenance is scoped into the EIA due to the potential for significant impacts. Tables 11.1 and 11.2 confirm that a Flood Risk Assessment (FRA) will be prepared for the proposed development. Until this information is available, we are unable to comment on the acceptability of the flood risk assessment, mitigation measures or residual risks associated with the proposed development.

The FRA should demonstrate that the development will be safe throughout its lifetime, taking account of climate change, without increasing flood risk elsewhere. We would welcome early engagement on the scope of the FRA as it is developed.

Sequential test

In accordance with the relevant National Policy Statements and National Planning Policy Framework, a sequential, risk-based approach should be applied to the location and design of the development, taking account of all sources of flood risk and climate change. Opportunities to locate development outside of Flood Zone 2 and 3 should be prioritised where practicable, particularly for more vulnerable components. The Applicant should demonstrate how the relevant Sequential Test and, where required, Exception Test provisions have been addressed.

Flood zones

The FRA should clearly define the extent of the functional floodplain (Flood Zone 3b), using appropriate hydraulic evidence and available Strategic Flood Risk Assessment information. It should establish the design flood extent, accounting for climate change of the development lifetime. Infrastructure should be set back from watercourses where practicable, allowing for future maintenance and flood risk management activities.

Proposed development lifetime

The anticipated development lifetime, including construction, operation and decommissioning, should be confirmed and justified. The FRA should adopt an appropriate assessment lifetime in accordance with current planning guidance, including consideration of future climate change impacts.

The National Policy Statement for Renewable Energy Infrastructure (EN-3) states:

- 2.12.34 – “Applicants should consider the design life of wind turbines when determining the period for which consent is required. Modern onshore wind turbines are now considered to have a significantly longer design life than the expected 25 years of early generation models. Therefore, it is expected that applicants may seek consent for at least 35 years, although applicants may seek consent without a time-period or for differing time-periods of operation.”

Climate change

The FRA should apply the relevant Environment Agency climate change allowances, informed by the flood risk vulnerability classification of the proposed infrastructure. Where essential infrastructure is proposed:

- The design event in the context of fluvial flood risk would be the 1% (1 in 100) annual exceedance probability scenario (AEP) plus higher central climate

change. An upper climate change allowance should also be assessed as a proxy for the fluvial credible maximum scenario.
- Where tidal flood risk is identified as relevant, the FRA should consider the 0.5% (1 in 100) AEP flood event, incorporating the higher central and upper end allowances over the relevant development lifetime. Where appropriate, a credible maximum (H++) scenario should also be assessed, in accordance with Environment Agency climate change guidance.

The assessment should demonstrate that essential infrastructure remains safe and operational during the relevant design event.

Hydraulic modelling and flood mechanisms

The FRA should be informed by appropriate hydraulic evidence and consider all relevant sources of flooding, including the potential for residual risk associated with the existing managed drainage network and flood risk management assets. Available hydraulic modelling should be reviewed to establish its suitability, with additional modelling or sensitivity testing undertaken where necessary. The assessment should account for potential changes to flood levels, extents, flow routes and storage resulting from the development. This should include consideration of any potential influence of downstream tidal conditions on the existing drainage network, where applicable.

Smaller watercourses and Drainage Networks

Flood risk associated with smaller watercourses and artificial drainage channels should be considered, including those not represented within the Environment Agency's Flood Map for Planning. The FRA should assess potential interactions with the existing drainage network, including watercourse crossings, drainage modifications and any relevant pumping or water level management assets.

Construction phase flood risk

The FRA should consider risks associated with temporary construction compounds, access tracks, working areas and watercourse crossings. Safe access and egress should be demonstrated for relevant scenarios in consultation with the local authorities' emergency planning teams. The Applicant should consider flood warnings and appropriate emergency arrangements.

Watercourse Crossings and Flood Risk Management Assets

Crossings should be designed to maintain flood conveyance and avoid increasing flood risk elsewhere. Clear-span bridges should be prioritised where practicable, with appropriate freeboard demonstrated, e.g., +600mm above the design flood level where applicable. Access to existing flood risk management assets should be

maintained for inspection, maintenance, repair and necessary works. The Applicant should engage with the relevant risk management authorities for works affecting watercourses and drainage infrastructure.

Floodplain Compensation

Where above ground construction, including raised access tracks, foundations, compounds or other infrastructure, results in a loss of floodplain storage, the FRA should consider the need for level-for-level, volume-for-volume floodplain compensation. This should account for the relevant design flood event with an appropriate climate change allowance. The assessment should demonstrate that flood flow routes are not inhibited and that the proposed development does not increase flood risk elsewhere.

Study Area and Hydrological Surveys

The extent of the FRA study area should be informed by the relevant flood mechanisms and hydraulic connectivity, rather than solely relying upon a fixed study area which is defined prior to site investigation. Hydrological surveys and available flood risk evidence should inform the iterative design process, allowing flood risk constraints to be addressed before the proposed layout is finalised.

Geomorphology

General advice:

Watercourse crossings

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, we encourage the use of trenchless techniques, such as 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.
- Position of HDD/trenchless crossing should also take into consideration lateral movement of the watercourse. Ideally trenchless crossings should be launched/received outside of the floodplain.
- 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 river movement, becoming an impediment to natural processes. Decommissioning plans should therefore take these factors into consideration and consider removal of such infrastructure at

decommissioning or at any time after.
- Consider opportunities to deliver WFD mitigation measures, including Nature based Solutions (NbS), as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables/pipelines to surface level in floodplains earmarked for future river restoration (see note above re. launch/reception locations).

Water Framework Directive:
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 Environment Agency.

WFD applies to all surface waterbodies, not just those designated for monitoring purposes.

Small watercourses and WFD - watercourses with a catchment less than 10km/2 connected to a downstream WFD waterbody take the classification of that d/s waterbody.

Biodiversity Net Gain and encroachment
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.

Protection of natural river processes
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.

Future geomorphological change and climate resilience
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).

Crossing design

If river crossings (bridges, culverts, and buried cables) are required as part of the development, we 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
Further guidance in regard to river crossings can be found in 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.

There is an assumption made that watercourses that feed into WFD waterbodies are not high quality. Whilst this is a legitimate assumption based on the predominantly artificial nature of this mainly agricultural environment; it still may not be a correct assumption. Surveys may be required to confirm the desk study data. As watercourses/ditches are within the red-line boundary, ditch condition and river condition surveys may need to be completed, and buffers established due to Biodiversity Net Gain considerations (minimum 5m buffer for ditches).

Appendix C - Informatives

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.

We recommend that developers should refer to:

- Position statement on the Definition of Waste: Development Industry Code of Practice;
- Our website at https://www.gov.uk/government/organisations/environment-agency.

Waste to be taken off site

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.
If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.

Environmental permits
If dewatering is required, the Applicant may require an abstraction licence if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works.

If the Applicant does not meet the exemption and requires a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on our website: Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk) and Apply for a water abstraction or impounding licence - GOV.UK (www.gov.uk)

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: https://www.gov.uk/government/publications/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 - GOV.UK (www.gov.uk)

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

Fenland District Council response to the Vattenfall Chatteris Wind Farm - EIA Scoping Report (Sept 2026)

PINS reference: EN0110041

Fenland District Council (FDC) welcomes the opportunity to comment on the EIA Scoping Report prepared for the Vattenfall Chatteris Windfarm by ERM which are set out below.

Approach to EIA Scoping and Consultation

Paragraph 5.2.6 and Table 5.1 describes the Scoping Report content required under Regulation 10 and suggested inclusions from PINS Advice Note 7 and Pre-Application Advice on EIA.

In Table 5.1 the criterion 'An outline of reasonable alternatives considered and the reasons for selecting the preferred option' is supposed to be included in Chapter 4. However, Chapter 4 only includes the criteria to be considered and not the alternatives considered and the reasons for the preferred option. This is an omission within the report which should be addressed.

Similarly, the final criterion in Table 5.1 provides for 'Evidence of agreements reached with consultation bodies (for example the statutory nature conservation bodies or local authorities)' in Chapter 5. However, there is no reference to any agreements reached with Fenland District Council in Chapter 5. As one of the host authorities FDC can confirm that other than an initial introduction to the proposal in a Teams meeting on the 24th July no other discussions have been held or agreements reached with the applicant.

Ecology and Bird Impacts

Impacts on the Ouse Washes designated sites and Functionally Linked Land

The wind turbine array and associated infrastructure will be within 500m of the Ouse Washes Special Protection Area, Special Area of Conservation, Site of Special Scientific Interest and Ramsar. The Ouse Washes have been designated for nature conservation primarily because they support internationally important populations of water and wading birds, including geese and swans, species known to be vulnerable to bird strike.

The proposals could have harmful impacts on the special interest of the Ouse Washes by –

- Causing direct bird mortality through birds striking turbine blades,
- Causing direct and indirect loss of functionally linked land,

- Interrupting established flight lines for birds moving between different foraging areas and roosting areas, including areas as far away as The Wash. Flocks of important bird species are frequently in motion across this area, particularly during the winter months.

Functionally linked land are areas of land outside a designated nature site, but which nevertheless are considered critical to the ecological or behavioural needs of mobile species associated with the protected site during specific seasons or life stages. These areas are not formally protected but serve as extensions of habitats, providing foraging, breeding, roosting, or movement corridors that maintain the integrity and functionality of the designated sites. In relation to wading and water birds, functionally linked land has been further defined by Natural England as areas of land occurring within 20 km of an SPA that are regularly used by significant numbers of qualifying bird species. What constitutes a significant number of birds is variable depending on the species concerned and the value of the designated site, while 'regularly' is taken to mean a period of several years. Areas of land which will be directly affected by the wind turbine array have been identified as likely to be functionally linked to the Ouse Washes. Direct and indirect loss of functionally linked land should be avoided.

The applicants should be aware that Natural England have advised that the citation for the Ouse Washes SPA should be extended to include the addition of breeding Cormorant, breeding Avocet and breeding Redshank to the SPA, and extension of the boundaries for non-breeding Hen Harrier, breeding Avocet and breeding Redshank. This should be borne in mind when assessing the impact of the scheme on the SPA and when providing information for a Habitats Regulations Assessment.

Bird survey work should therefore be sufficient to be able to assess direct, indirect, cumulative and in-combination effects of the proposals on designated sites, functionally linked land and established bird flyways. Currently it would appear that planned ornithological survey effort represents close to the minimum standards required, rather than reflecting the very important international value of the area. This high value justifies maximum survey effort, to include areas wider than just within the application boundary so that the impacts of the proposal on the ecological functionality of the wider area can be comprehensively assessed.

Informed by the survey effort, the EIA must identify comprehensive and appropriate avoidance, mitigation and compensation measures where required.

FDC is concerned that currently the Scoping Report provided by the applicant states that *'each turbine would have a micro-siting allowance of up to 100 m'*. 100m is not micro-siting. Siting of turbines should be closely informed by ecological considerations.

Although it is recognised that future grid connection will not form part of the DCO application, it should be noted at this stage that ornithological considerations and the

proximity of the Ouse Washes should be an important part of any design process for grid connection.

Furthermore, the Scoping Report fails to address the movement of bird species between other internationally designated nature sites. For instance, there is significant movement between the Ouse Washes and the Nene Washes to the north which is within 20km of the site. The proposed wind farm will fall in-between potential flight routes, and this therefore needs to be 'scoped in' to the Environmental Statement.

Similarly, movement between the Ouse Washes and other designated nature sites also needs to be 'scoped in' to the ES.

Impacts on Local Nature Recovery Efforts

The applicant should be aware that in this area future nature conservation efforts will prioritise the creation and establishment of wetland, and particularly of wetlands which support important water and wading bird populations. The creation of the nearby new Fens Reservoir to the north of Chatteris aims to provide very large areas of new wetland habitats of value to breeding and wintering birds, and the large area of open water which the Reservoir will provide will inevitably attract large numbers of waterbirds.

The Cambridgeshire and Peterborough Local Nature Recovery Strategy also recommends the creation of a range of wetland habitats in the area.

It would be expected that the wind farm array will not compromise these future local nature conservation initiatives, and that any habitat creation and enhancement efforts associated with the scheme would prioritise the creation of wetland areas of value to wading and water birds associated with the Ouse Washes, including re-wetting land, enhancing waterways and improving feeding and loafing opportunities for birds.

If on-site habitat creation and enhancement opportunities are found to be likely to compromise future efforts for nature recovery, consideration should be given to providing off-site compensation measures.

Biodiversity Net Gain

The proposals must achieve at least a 10% net gain in biodiversity. Any future application must be informed by an up-to-date habitat survey undertaken to UKHab standards, habitat condition assessments and a baseline biodiversity metric. Any priority habitats present must be identified and mapped. A Biodiversity Gain Plan should be provided, describing how required biodiversity gains are to be achieved. If gains cannot be achieved on site, details of off-site provision should be given.

Other species

Dedicated surveys for the following species should be undertaken to recognised standards –

- Badgers
- Bats
- Otters
- Water Voles
- Amphibians
- Reptiles
- Brown hares

If impacts on any of the above species are anticipated, comprehensive mitigation and compensation measures must be proposed.

Landscape Impacts

These comments are provided solely in relation to the proposed scope of the Landscape and Visual Impact Assessment (LVIA) set out in Chapter 9 of the submitted EIA Scoping Report. They identify those matters which should be included within the Environmental Statement chapter and where additional information, refinement or clarification is required.

The proposed inclusion of a Landscape and Visual Impact Assessment (LVIA) within the EIA is welcomed and considered necessary given the scale of development, the sensitivity of the receiving landscape, and the role the site plays within the wider open Fens landscape. FDC considers the wind farm will very likely give rise to significant landscape and visual effects.

The proposed development comprises up to 15 wind turbines with a maximum tip height of 220m set within an expansive, open Fenland landscape, together with a BESS, on-site substation and associated infrastructure. The Scoping Report correctly identifies landscape and visual effects as a principal environmental issue and confirms that a full LVIA will be undertaken in accordance with GLVIA3.

The overall proposed scope of the LVIA is broadly accepted. However, the Environmental Statement should adopt a precautionary and comprehensive approach to landscape and visual assessment with the following of particular importance:

- The exceptionally large scale of the proposed turbines (220m tip height);
- The openness and extensive visibility characteristics of the Fenland landscape;
- The potential influence on long-distance views including views associated with local landmarks;
- The likely requirement for aviation lighting; and
- The emerging cumulative wind energy context across Fenland and wider Cambridgeshire.

Landscape Character and Visual Assessment

The proposed 10km landscape character study area is generally appropriate for identifying potentially significant landscape effects. However, the ES should clearly justify whether significant indirect landscape effects may extend beyond 10km due to the extensive openness of the Fenland landscape, the unusually large turbine scale, long distance visibility across low lying terrain, and potential effects on landscape perception and skyline character.

The Applicant should retain flexibility to assess additional Landscape Character Types or Areas beyond the 10km radius where fieldwork and ZTV analysis indicate potential significant effects.

With regards to visual effects, the proposed 30km visual study area is considered appropriate and is welcomed.

The Scoping Report is correct to identify a current lack of local landscape character assessments within the study area. Although FDC welcomes the highlighting of The Landscape Character Typology for the East of England (2010) as an important baseline document, we do not agree that this provides the "most consistent framework for assessing landscape character across the study area" (Para 9.5.3). Due to the scale of the development and lack of existing fine-grained character assessments, it would be proportionate for the Applicant to provide their own characterisation as part of the baseline study. Relying on the East of England Typology would not be sufficient.

There appears to be limited information relating to specific elements of the proposed LVIA methodology. For example, the method for considering landscape value is not specified. We would request the Applicant provides a proposed detailed methodology for agreement in advance of any assessment.

The proposed viewpoint selection appears to be sparse. Considering the scale of the proposed turbines and the extensive visibility within the Fens, we expect to see a considerably greater number of representative viewpoints.

Although the Scoping Report identifies a range of appropriate visual receptors, which is welcomed, it is our opinion that views from non-promoted public rights of way are incorrectly omitted. We would expect an updated viewpoint plan to include views from non-promoted PRoWs before any agreement on representative viewpoints is made.

We are generally satisfied with the proposed elements scoped in and out of the LVIA chapter within Tables 9.2 and 9.3. However, we do not agree with the proposal to scope out some construction effects. The Scoping Report attempts to justify this by stating operational effects are likely to represent the worst-case scenario and therefore further assessment of construction effects is not required. This is not agreed and detailed consideration of construction effects is required.

Heritage Impacts

The proposed 15 x turbines will be very tall. Whilst there are already a large number of wind farms within or close to the district there are no others of this height and scale in the area.

The proposed heritage assessment is broadly appropriate in principle, but there are several important matters that should be clarified or strengthened before accepting the proposed scope as sufficient.

The report identifies the principal heritage risks, including direct impacts on two Scheduled Monuments within the site, a substantial archaeological resource, and the potential effects of very tall turbines on the settings of heritage assets across the Fenland landscape. However, this is a scoping report rather than a completed heritage assessment. The archaeological baseline remains incomplete, and the extent to which the assessment will properly address setting, long-distance views and the significance of individual assets will depend on work still to be undertaken.

The most important considerations from a heritage standpoint, are:

- The treatment of the two Scheduled Monuments within the site, including their protection from construction and the implications of the final infrastructure layout. – This will largely be considered by then County Archaeology team.
- The adequacy of the 10 km study area for designated heritage assets, given the scale of the turbines and the open, low-lying Fenland landscape.
- The need for a robust assessment of heritage significance and the contribution made by setting, rather than relying on visibility alone.
- The extent of archaeological investigation needed, given the preliminary identification of 235 heritage records within the site and its 1 km surroundings. To be considered by County Archaeology
- The need to consider cumulative effects and the relationship between the heritage assessment and the landscape and visual assessment.

The 10 km study area and the setting of heritage assets:

This is one of the most significant failings raised in the report.

The proposal comprises up to 15 turbines, each with a maximum tip height of 220 metres. The report also identifies Ely Cathedral beyond the 10 km study area, for exceptional consideration where the initial ZTV indicates potential intervisibility.

However, FDC considers that the 10 km radius should be treated as an initial study area, not an automatic limit on heritage assessment.

The report does at least recognise this by allowing consideration of assets beyond the study area. That is welcome. However, its approach to the wider area should be sufficiently systematic to avoid overlooking other assets whose significance may be affected by the development further afield. This is especially relevant in a flat Fenland landscape, where the scale of the turbines will certainly make them prominent over considerable distances.

The visual assessment is to be over a 30km radius and therefore it is not unreasonable to provide a greater distance for assessment on the settings of heritage assets.

Transport Considerations

Chapter 2 – Project Description

The description of the local roads surrounding the site are noted along with the need for a new access from the A142 during construction, operation, and maintenance. It is also noted that Public Rights of Way (PRoW) are close to the site. FDC's comments below on Chapter 12 Traffic and Transport set out some key issues and concerns and points to note in respect of the local road network, A142 and PRoW.

The need for new access points onsite and to the highway network is noted, along with localised widening, as set out in Table 2.1. Further consideration of these matters and specific details will need to be shared and agreed with Cambridgeshire County Council as the Local Highway Authority.

The initial route being proposed for AILs in 2.2.21 requires detailed assessment and appropriate mitigation as is required. The note that this is expected to be informed by further work and the transport assessment is acknowledged.

It is also noted that temporary access tracks are expected to be needed during construction to facilitate various movements. Further details about this including specific locations and possible impacts on the wider transport network will need to be provided about this in due course.

Chapter 3 – Policy and Context

In Chapter 3 there is no reference to the Cambridgeshire and Peterborough Combined Authority (CPCA). As the Transport Authority for Cambridgeshire, we would have expected them to be mentioned in this chapter and other places throughout the EIA Scoping Report. We would specifically direct you to their website with a need to review the current Local Transport and Connectivity Plan and the Local Growth Plan. A link to their website is here: Cambridgeshire & Peterborough Combined Authority

There is no mention of the Fenland Rail Development Strategy 2011 – 2031 (adopted 2012) or the Fenland Walking. Cycling and Mobility Aid Strategy (2022), both of which are relevant to this proposal. Please see the links below:

Fenland Rail Development Strategy - Fenland District Council

Fenland Cycling, Walking and Mobility Aid Improvement Strategy - Fenland District Council

We would also have expected to see links to the County Council Rights of Way Improvement Plan. This can be found from the following link:

Rights of Way Improvement Plan | Cambridgeshire County Council

Chapter 9 – Landscape and visual

In Chapter 9 there are a range of comments and acknowledgements of the road, railway and active travel networks that are likely to need screening from a landscape and visual perspective. These comments and locations are noted. We await further detail about the proposals for the screening. We would welcome an opportunity to discuss this with you in more detail when there are proposals for consideration and comments.

In Table 9.2 the comment about the operational cumulative effects and these impacts representing a reasonable worst-case scenario is noted when compared with proposed construction impacts. However, clarity is needed around when such mitigation will be implemented. As construction begins to gather pace there will clearly be impacts that start to be cumulative.

Chapter 13 – Traffic and Transport

The earliest opportunity should be taken to seek further advice and information from the Transport Assessment Team and Highways Development Control Team at Cambridgeshire County Council in their role as the Local Highway Authority. We would recommend using their pre-application advice service so that you can fully establish all their requirements for the Transport Assessment that will be needed as part of the DCO application. An early indication of the Highway Authority comments and requirements for the Transport Assessment can assist and reduce time being wasted on requirements that are not necessary for their review.

We would also suggest that you seek early advice from the County Council Public Rights of Way team in respect of various routes that are close to or are within the study area. It is essential that access by foot or bike on the PRoW network is always maintained and where necessary mitigation proposals offer alternative access if this is needed.

It is noted in paragraph 13.2.3 that access from Great Yarmouth Port will include a route using the A47. The A47 is a strategic national route that is extremely busy and prone to congestion. There are also high levels of accidents on this road. FDC is working with

partners and other Local Authorities along the route to campaign for improvements through the A47 Alliance. Norfolk County Council administer the Alliance. It is suggested that the applicant contacts them in respect of becoming a business supporter of the alliance helping to support and secure much needed improvements.

It is noted in paragraph 13.2.4 that the A141, A142 and B1050 are considered local roads that may see a material change in flows because of this proposal. The A141 and A142 are both busy roads with various congestion points. There are also expected to be cumulative impacts on these roads due to proposed developments to be specified in the emerging Fenland Local Plan – Fenland 50 and other NSIP projects in the district, most specifically Anglian Water's proposed Fens Reservoir project which is located relatively close to the proposed windfarm site. It is essential that the traffic and transport effects of the proposed development on these roads is fully understood along with the cumulative impacts.

In paragraph 13.3.1 reference is made to Norfolk and Suffolk highway records as data sources. Given that the location of the proposed development is in Cambridgeshire, it is disappointing that no records from this county formed part of the review, especially as this was used to prepare the Traffic and Transport Chapter. Further work and updates are therefore needed to ensure that Cambridgeshire and its transport network are adequately assessed and considered in respect of this proposed development.

In paragraph 13.3.13 it is noted that traffic, transport and active travel surveys will be undertaken as required to inform the assessment, including traffic counts, routeing studies, and junction observations. Additional information will be needed about the proposed surveys and their locations. It is also suggested that these need to be formally confirmed and agreed with all the Local Highway Authorities affected.

In Table 13.2 regarding the operational phase and PRoW, the reference to design considerations maintenance and access arrangements is noted. Any proposals must be confirmed with Cambridgeshire County Council Public Rights or Way Team. It is expected that full access will always be maintained or appropriate mitigation arrangements.

Paragraph 13.5.8 about baseline surveys having not been completed is noted. It is essential that some of these surveys are undertaken within Cambridgeshire and that discussions take place with Cambridgeshire County Council prior to this work commencing.

In paragraph 13.5.9 there is reference to the scoping opinion have been sent to the appropriate authorities for comment. Whilst the development is not within Huntingdonshire District it is to be very close to its boundary, and they should also have an opportunity to comment on the scoping report.

Climate Change

Fenland district has been subject to three tidal surge events in the last 15 years or so. These were caused by a combination of factors including low pressure weather systems, high river levels, a rise in global temperatures and a rise in sea levels.

The proposed site is situated within Flood Zone 3 (High risk) and would be at a lower level than the tops of the flood defence embankments of the nearby Ouse Washes. The washes are a complex flood drainage and storage system which allows for sea water ingress in certain circumstances. They are therefore subject to sea water influence and in times of a major flood event, should the defences fail, the site would be at risk of flooding.

Whilst it is noted that this issue might be addressed in the Flood Risk Assessment, FDC considered that it should be 'scoped in' to the EIA.

Impact on FDC Engineering Assets

Given the rural locations of the proposed assets, there is unlikely to be impact on any FDC owned engineering assets.

Noise and Air Quality Impacts

FDC's Environmental Health team acknowledges the submitted information and have no adverse comments to make in principle at this stage.

This stance is taken on the information submitted to date, having particular regard to the proposed use of the recently adopted Department for Energy Security and Net Zero "Assessment and Rating of Wind Turbine Noise" which replaces the more widely nationally recognised methodology "ETSU-R-97: The Assessment and Rating of Noise from Wind Farms".

Whilst no further comments are considered necessary at the present time, the Environmental Health service will provide responses on relevant aspects of the proposed scheme when more detailed information is available and submitted going forward.

From: [redacted]forestrycommission.gov.uk>
Sent: 23 October 2026 10:28
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Subject: Chatteris Wind Farm EIA Scoping Consultation - EN0110041

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Thank you for consulting the Forestry Commission on this proposal.

There are no ancient woodlands or mixed deciduous priority habitat woodlands within the project area. Canopy cover is very low within the site, although there are a few isolated copses and tree belts.

Scoping documents state that tree and woodlands affected by the proposals will be assessed and compensated for as necessary.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

It is expected that there will be thorough assessment of all trees within the project boundary to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. There is the opportunity for further tree planting within the project area, in line with the character of the area.

However, there are a number of issues that need to be considered when proposing planting schemes:

Woodlands or scrub should not be used as screening for any BESS without the use of fire or fuel breaks to reduce the risk of possible wildfire should a battery fire occur.

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases.

Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience.

The Climate Matching Tool - Forest Research also provides a visualisation of regions with a similar climate to the climate projection for any location in Europe. It gives an indication of the climate that trees are likely to experience in the future. This can help to consider the selection of better suited material from environments that England may experience in the future.

Plans should also be in place to ensure the long term management and maintenance of new and existing trees and woodland within the site.

If you require any further information, please do not hesitate to contact me.

Best wishes

[redacted]

[redacted]

Local Partnership Advisor
East & East Midlands

Tel: [redacted]
[redacted]@forestrycommission.gov.uk



Subscribe to our newsletter to be the first to hear about the latest information, advice, and news from the Forestry Commission

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This email has been scanned for viruses and malware.

From: FPL - Conx Request <ConnectionRequest@fulcrum.co.uk>
Sent: 29 September 2026 16:18
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Subject: RE: EN0110041 Chatteris Wind Farm EIA Notification

You don't often get email from connectionrequest@fulcrum.co.uk. Learn why this is important

Good Afternoon

We can confirm Fulcrum Pipelines Limited do not have any existing pipes or equipment on or around the above site address.

Please note that other gas transporters may have plant in the area which could be affected by your proposed works.

We will always make every effort to help you where we can, but Fulcrum Pipelines Limited will not be held responsible for any incident or accident arising from the use of the information associated with this search. The details provided are given in good faith, but no liability whatsoever can be accepted in respect thereof.

If you need any help or information simply contact Fulcrum on [redacted].

In case of an emergency please phone [redacted]

Kind regards,

FULCRUM

FPL - Conx Request
e: ConnectionRequest@fulcrum.co.uk | w: www.fulcrum.co.uk
a Fulcrum : ,4 Europa Court ,Sheffield Business Park ,Sheffield ,S9 1XE ,T: 03330 146466

Tell us how we're doing:

We'd really appreciate feedback on your experience with us today. So, please tell us how we're doing by emailing feedback@fulcrum.co.uk

Our Ref: 26/03871/SCOP

14 October 2026

GREATER CAMBRIDGE
SHARED PLANNING

[redacted]
Infrastructure Decisions and Applications Service
Environmental Services
Planning Inspectorate
C/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

www.scambs.gov.uk | www.cambridge.gov.uk

Dear Sir/Madam

Cambridge City Council
Request for a formal Scoping Opinion

Proposal: PINS DCO - EIA Scoping Opinion request pursuant to Regulations 10 and 11 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). The proposed application by Vattenfall Wind Power Limited for an Order granting Development Consent for the Chatteris Wind Farm for up to 15 turbines (max tip height 220m).

Site address: Chatteris Wind Farm

Your client: [redacted]

Thank you for your request received 13 October 2026 for a formal Scoping Opinion under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (as amended).

I have been assigned as Case Officer and will endeavour to provide a response within 5 weeks of receipt of your request.

Should you need any further help, please find my contact details above.

Yours faithfully

[redacted]
Strategic Sites Team Leader

Email: [redacted]@greatercambridgeplanning.org
Direct dial: [redacted]

From: [redacted]
Sent: 15 October 2026 14:29
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Subject: Chatteris Wind Farm - EIA Scoping Consultation Response

You don't often get email from [redacted]. Learn why this is important

Dear Sir/Madam,

On behalf of Haddenham Parish Council, I am writing in response to the consultation on the Environmental Impact Assessment (EIA) Scoping Report for the proposed Chatteris Wind Farm.

The Council wishes to express its concern regarding the potential loss of high-quality agricultural land, particularly Grade 1 land, which is an important resource for food production.

The Council requests that the Environmental Impact Assessment fully assesses the impact of the proposed development on agricultural land and soil resources, including:

- The extent of Grade 1 agricultural land that would be permanently or temporarily lost to the development and its associated infrastructure.
- The implications for local and national food production arising from the loss of productive agricultural land.
- The potential impacts on soil quality, soil structure and long-term agricultural productivity during construction, operation, and decommissioning.
- Whether alternative site layouts or locations could reduce the loss of the highest-quality agricultural land.

The Council considers that the protection of productive agricultural land must be given due consideration alongside the benefits of renewable energy generation. Grade 1 agricultural land is a finite and valuable resource, and its loss should not be treated as an unavoidable consequence without a thorough assessment of alternatives and potential mitigation.

The Council therefore requests that agricultural land quality, soil resources and food production are appropriately addressed within the scope of the Environmental Impact Assessment, with clear evidence provided to support the assessment of any potential impacts.

Kind Regards,

[redacted]
CiLCA | PSLCC | Cert HE
Clerk & RFO

Haddenham Parish Council
serving the villages of Haddenham and Aldreth

LOCAL COUNCIL AWARD SCHEME GOLD

A Civility & Respect Pledge Council

www.haddenham-pc.gov.uk
[redacted]

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By email only:
ChatterisWindFarm@planninginspectorate.gov.uk

CEMHD - Land Use Planning,
NSIP Consultations,
Building 1.2, Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS.
NSIP.applications@hse.gov.uk

Date: 21/10/2026

Dear Sir/Madam,

PROPOSED CHATTERIS WIND FARM PROJECT
PROPOSAL BY VATTENFALL WIND POWER LIMITED
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) REGULATIONS 10 AND 11

Thank you for your e-mail of dated 29/09/2026 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:

Area of interest was provided by Vattenfall Wind Power defined in the following files (no detail of the activity was provided):

GBCTF01WN_BDSB_SiBdry_v05_260605lhop27700.zip:

GBCTF01WN_BDSB_SiBdry_v05_260605lhop27700.dbf	DBF File	1 KB	No	1 KB	50%	18/06/2026 12:46
GBCTF01WN_BDSB_SiBdry_v05_260605lhop27700.prj	Text Docume...	1 KB	No	1 KB	35%	18/06/2026 12:46
GBCTF01WN_BDSB_SiBdry_v05_260605lhop27700.shp	SHP File	29 KB	No	55 KB	47%	18/06/2026 12:46
GBCTF01WN_BDSB_SiBdry_v05_260605lhop27700.shx	SHX File	1 KB	No	1 KB	46%	18/06/2026 12:46

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

Reviewing the outline of the area of interest given in the files above the proposed development did not fall inside any of HSE's consultation distances. However, no cable route was provided, and this should be the subject of a further consolation.

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.

Explosives Sites:

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

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 sincerely

CEMHD NSIP Consultation Team

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:

n/a

PINS ref: EN0110041
Our ref: [redacted]
Date: 27th October 2026
Contact: [redacted]
Email: [redacted]

Huntingdonshire DISTRICT COUNCIL
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN
www.huntingdonshire.gov.uk

Sent via email to: ChatterisWindFarm@planninginspectorate.gov.uk

Dear Sir/Madam

Environmental Impact Assessment (EIA) Scoping consultation by Vattenfall Wind Power Limited ("the Applicant") for Chatteris Wind Farm Development Consent Order (DCO) proposals

I am writing on behalf of Huntingdonshire District Council (the Council) in response to your request dated 29 September 2026 regarding the Applicant's EIA Scoping Report for the Chatteris Wind Farm proposals. The Council understands that the Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008 (as amended), and that the Applicant has sought a Scoping Opinion from the Planning Inspectorate (PINS), on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement (ES) that will accompany its future application.

The Council acknowledges that it has been identified by PINS as a consultation body for the purposes of informing the Scoping Opinion. Whilst the Chatteris Wind Farm proposal does not fall within the Council's administrative boundary, the western extent of the Indicative Order Limits lies directly adjacent to the district boundary. The Council's comments are set out in the attached table. The comments provided are made on a without prejudice basis and having regard to the material provided. The Council reserves the right to offer further comments on the scope of the EIA in future submissions.

The comments set out in this response are a technical officer response to the EIA Scoping Report on matters for which Huntingdonshire District Council has responsibility, expertise or a statutory function. They should not be interpreted as expressing a view on the merits or acceptability of the Proposed Development. As the DCO process progresses, the Council will have further opportunities to comment on the merits and impacts of the scheme, and reserves the right to provide additional representations as appropriate. The Council also recognises that the DCO process enables members of the public, businesses, community groups and other interested parties to make their own representations directly to the Applicant and Planning Inspectorate, and encourages participation in the process.

If you have any queries regarding this submission or require any further information, please contact [redacted] by email: [redacted]

Yours sincerely,



[redacted] **Head of Planning, Infrastructure & Public Protection (Chief Planning Officer)**
Development Services
Corporate Delivery
Huntingdonshire District Council

Appendix A: Comments on the Applicant's EIA Scoping Report

This document sets out the comments by Huntingdonshire District Council (**the Council**) regarding Vattenfall Wind Power Limited's EIA Scoping Report for the Chatteris Wind Farm proposals (PINS ref: EN0110041).

The following table contains comments across a number of technical specialisms where HDC has a statutory function or holds technical expertise relevant to the topic area.

Topic	Reference	Comments
Air Quality	Chapter 17.2 Scoping Report	The proposed 250m study area for construction dust effects is considered appropriate and should include all potentially sensitive receptors within Huntingdonshire. The proposal to follow the guidance from the Institute of Air Quality Management is considered acceptable. Furthermore, a CEMP is proposed which should include air quality mitigation methods. We appreciate that no detailed air quality modelling will be required for construction traffic.
Construction Environmental Management Plan (CEMP)	N/A	It is proposed that a Construction Environmental Management Plan (CEMP) will be submitted with the Environmental Statement. The CEMP should be designed to protect the local residents from any unacceptable noise, dust, odour and fumes. The CEMP should address the following matters: • Construction programme. • Contractors' access arrangements for vehicles, plant and personnel including the location of construction traffic routes, details of their signing, monitoring and enforcement measures, along with location of parking for contractors and construction workers. • Construction hours. • Delivery times for construction purposes. • Noise mitigation methods in accordance with the provisions of BS 5228-1:2009+A1:2014 Code of Practice for noise and vibration control on construction and open sites (or its subsequent revision). • Dust management and wheel washing measures to prevent the deposition of debris on the highway. • Screening and hoarding details. • Access and protection arrangements around the site for pedestrians, cyclists and other road users. • Procedures for interference with public highways, (including public rights of way), permanent and temporary realignment, diversions and road closures.

Topic	Reference	Comments
		• External safety and information signing and notices including who to contact in the event of a complaint. • Liaison, consultation and publicity arrangements including dedicated points of contact. • Consideration of sensitive receptors. • Prior notice and agreement procedures for works outside agreed limits. • Location of Contractors compound and method of moving materials, plant and equipment around the site.
Temporary Construction Compounds	Table 2.1 Indicative Design Parameters	The Scoping Report states that the Proposed Development would require temporary construction compound(s) and storage areas within the site, however, the exact location is yet to be determined. To ensure a robust assessment of likely significant effects (LSE), the ES should provide details regarding the number, location and dimensions of construction compounds.
Cumulative Effects	Chapter 18 Scoping Report	It is noted that the cumulative development long list will remain under review during the EIA. Figures 18.1a-c have been reviewed and there appears to be some applications missing from the list which would have been expected in the initial long list e.g. 25/01922/OUT for a substantial industrial and logistics development on a 126-hectare site north-west of Huntingdon which appears to be within 30km of the Indicative Order Limits. The Council would welcome the opportunity to review the long list as it is developed. Clarification would also be welcomed on the types of development being considered for inclusion, for example residential, employment, energy and infrastructure schemes, and the thresholds or criteria applied for inclusion within the cumulative assessment. It is also not clear if the current list includes other Nationally Significant Infrastructure Projects in the vicinity, including the Fens Reservoir project.
Operation and Maintenance	Paragraph 2.4.6 – 2.4.8	It is noted that the detailed operation and maintenance regime would be refined as the design of the Proposed Development evolves and would be described further in the ES. The ES should include the indicative operational lifespan of scheme components, recognising that individual components may have a shorter lifespan than the anticipated 40-year operational life of the project. The ES should also assess a major replacement campaign on the basis of a worst-case scenario involving the replacement of 100% of the Proposed Development. This is necessary to provide a robust assessment of potential effects, recognising that components may require replacement at the end of their operational life or as a result of technological advances in wind turbine technology over the lifetime of the project.

Topic	Reference	Comments
		The Applicant may wish to have regard to the approach taken in the East Park Energy DCO application (which has not yet been determined), where a worst-case replacement scenario was assessed as part of the Environmental Statement.
Noise and Vibration	Chapter 14 Scoping Report and associated tables/appendices	The identified noise-sensitive residential receptors within Huntingdonshire, as listed in Table 14.1 and Figure 14.1, appear appropriate for the purposes of the assessment. Based on the information provided, no residential receptors within Huntingdonshire appear to be located within 500m of a proposed turbine. The proposed study area for construction noise and vibration, extending 300m from construction activities, is considered acceptable. The proposed assessment methodologies, including BS 5228-1, BS 5228-2, DMRB LA111, BS 4142 and the Assessment and Rating of Wind Turbine Noise (DESNZ, 2026), are considered appropriate. It is accepted that separate assessments of infrasound, low-frequency noise, amplitude modulation and ground-borne vibration are unlikely to be required within the Environmental Statement, provided the operational noise assessment is undertaken in accordance with the Assessment and Rating of Wind Turbine Noise (DESNZ, 2026) and any relevant supporting guidance. It is noted that construction traffic is proposed to approach the site from the north and therefore is not expected to pass through Huntingdonshire.
Human Health	Chapter 17.1 Scoping Report	Defer to Cambridgeshire County Council as the relevant public health authority.
Biodiversity and Nature Conservation	Chapter 6 Scoping Report	Please refer to **Appendix B** of this response for comments provided by Place Services on behalf of Huntingdonshire District Council.
Ornithology	Chapter 7 Scoping Report	Please refer to **Appendix B** of this response for comments provided by Place Services on behalf of Huntingdonshire District Council.
Cultural Heritage and Archaeology	Chapter 8 Scoping Report	Please refer to **Appendix D** of this response for comments from HDC's Conservation Officer on above ground heritage assets. The Council defers to Cambridgeshire County Council on archaeology matters.

Topic	Reference	Comments
Landscape and Visual	Chapter 9 Scoping Report	Please refer to **Appendix C** of this response for comments provided by Place Services on behalf of Huntingdonshire District Council.
Shadow Flicker	Chapter 10 Scoping Report	Figure 10.1 identifies a number of residential receptors within the Council's administrative area that fall within the proposed Shadow Flicker Study Area. Of the 94 potential receptors identified, a significant proportion appear to be located within the Council's administrative boundary. The following property should also be included, as it appears to be located within or on the edge of the Shadow Flicker Study Area: • Ashmire Meadow Drove, Earith, Huntingdon, PE28 3SA The Council would welcome further engagement on this matter and requests the opportunity to review and comment on the receptor/property list as it is developed further, noting that Figure 10.1 appears to only show residential properties. The Council agrees that shadow flicker should be scoped in during the operational phase, as set out in Table 10.2. The proposed scoping out of shadow flicker effects during construction, as set out in Table 10.1, is acknowledged. However, clarification is sought as to whether the wind turbines would become operational simultaneously or be commissioned incrementally. This should be confirmed within the ES.
Hydrology, Hydrogeology, Geology and Peat	Chapter 11 Scoping Report	The Council defers to the host authorities and Cambridgeshire County Council in respect of hydrology, hydrogeology, geology and peat matters.
Traffic and Transport	Chapter 13 Scoping Report	The Council defers to Cambridgeshire County Council as Local Highway Authority on traffic and transport matters.
Socio-Economics, Tourism, Recreation and Land Use	Chapter 15 Scoping Report	No comments have been received from relevant internal consultees at this stage. The Council would, however, welcome further engagement as the assessment progresses, noting that HDC lies within the study area.

HDC Reference: 26/70009/SCOP

Appendix B: Ecology comments on the Applicant's EIA Scoping Report by Place Services on behalf of Huntingdonshire District Council

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
www.placeservices.co.uk

Date: 20 October 2026
Our ref: 23085

[redacted]
Huntingdonshire District Council
Pathfinder House
St Mary's Street
Huntingdon
Cambridgeshire
PE29 3TN

By email only: developmentcontrol@huntingdonshire.gov.uk

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Huntingdonshire District Council planning decisions with regard to potential ecological impacts from development.

Application: 26/70009/SCOP
Location: Land At Chatteris Fen Chatteris Road Somersham
Proposal: This application is not being determined by Huntingdonshire District Council - Planning Inspectorate Reference EN0110041 Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) Regulations 10 and 11 Proposed application by Vattenfall Wind Power Limited (the applicant) for an Order granting Development Consent for the Chatteris 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 Place Services on the above EIA scoping application.

Scope of the Environment Statement agreed	☒
Scope of the Environment Statement not agreed	☐

Summary

We have reviewed the submitted documents for this application. This includes the EIA Scoping Report (Environmental Resources Management Ltd, September 2026) and associates appendices. As a result, we have the following comments:

Baseline Information:

We welcome that the desktop assessment will assess ecological data which will be obtained through engagement with the following organisations and data providers:

- Natural England;
- Cambridgeshire and Peterborough Environmental Records Centre (CPERC);
- Environment Agency;
- Local Wildlife Trusts; and
- Other relevant local species recording groups and conservation organisations, where appropriate.

It is recommended that biological data from surveys undertaken should be shared with the CPERC or other relevant local records centres.

Methodology:

The submitted ecological reports should be prepared in accordance with relevant CIEEM guidance, which is consistent with the principles of BS 42020:2013 Biodiversity - Code of Practice for Planning and Development. This should include, as applicable, the Guidelines for Preliminary Ecological Appraisal, Guidelines for Ecological Impact Assessment, Guidelines for Ecological Report Writing, and Lifespan of Ecological Reports and Surveys. Ecological surveys should be undertaken in accordance with current best-practice methodologies, and surveys and assessments for protected species should accord with relevant Government Standing Advice.

We support the proposal to undertake bird surveys in accordance with current NatureScot guidance for onshore wind farm developments[1], recognising that there is no single industry-standard methodology for assessing impacts on breeding and wintering birds associated with wind energy proposals as no detailed methodology has been issued on how to appropriately assess impacts upon breeding and wintering birds from windfarms. However, survey methodologies should also have regard to Bird Survey Guidelines[2] and clearly justify any departures from established best practice where professional judgement has been applied.

In accordance with Regulation 14 of the EIA Regulations, the Environmental Statement should include a statement outlining the relevant expertise and qualifications of the competent experts responsible for its preparation.

[1] NatureScot guidance for onshore wind farms, 2025. Available at: https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impact-assessmentonshore-windfarms.
[2] https://birdsurveyguidelines.org/

Any badger survey information should be submitted as a separate confidential appendix and clearly marked as containing sensitive ecological information to avoid inappropriate disclosure of sett locations.

EIA Scope:
On review of the proposed scope for biodiversity and nature conservation, we have the following comments:

Receptor	Scope Justification	Comment
Construction and decommissioning phase:		
International statutory designated sites (The Ouse Washes SPA, SAC and Ramsar site)	Disturbance, habitat degradation, pollution and other indirect effects arising from construction activities. Potential for significant impact, scoped in.	The Ouse Washes SPA, SAC, Ramsar site is approximately 0.5 km southeast of the Site. We welcome that all potential impact pathways will be assessed as part of the finalised Ecological Impact Assessment (EcIA) and Habitats Regulation Assessment (HRA). As a result, we support the recommendation to scope in international statutory designated sites into the EIA during the construction phase of the development.
National statutory designated sites	Disturbance, habitat degradation, pollution and other indirect effects arising from construction activities. Potential for significant impact, scoped in.	The Ouse Washes SSSI is approximately 0.5 km southeast of the Site. As a result, we welcome that all potential impact pathways will be assessed as part of the finalised EcIA. As a result, we support the recommendation to scope in national statutory designated sites into the EIA during the construction phase of the development.

Receptor	Scope Justification	Comment
Local statutory designated sites	Disturbance, habitat degradation, pollution and other indirect effects arising from construction activities. Potential for significant impact, scoped in.	Somersham Local Nature Reserve (LNR) is located approximately 1.2 km west of the Site. As a result, we welcome that all potential impact pathways will be assessed as part of the finalised EcIA. As a result, we support the recommendation to scope in local statutory designated sites into the EIA during the construction phase of the development.
Local non-statutory designated sites	Disturbance, habitat degradation, pollution and other indirect effects arising from construction activities. Potential for significant impact, scoped in.	Multiple local non-statutory designated sites are present within the immediate vicinity of the development. As a result, we support the recommendation to scope in local statutory designated sites into the EIA during the construction phase of the development.
Habitats	Temporary and permanent habitat loss disturbance and indirect impacts such as pollution. Potential for significant impact, scoped in.	We support the recommendation to scope in habitats (including Priority habitats) into the EIA during the construction phase of the development.
Amphibians (including great crested newt)	Potential effects include loss of habitat, displacement, disturbance, and killing and injuring. Potential for significant impact, scoped in.	We support the recommendation to scope in amphibians into the EIA during the construction phase of the development.
Badger	Loss of habitat, displacement and disturbance. Potential for significant impact, scoped in.	We support the recommendation to scope in Badger into the EIA during the construction phase of the development.

Receptor	Scope Justification	Comment
Bats (foraging and commuting)	Loss of habitat, habitat fragmentation, displacement and disturbance. Potential for significant impact, scoped in.	We support the recommendation to scope in bats (foraging and commuting) into the EIA during the construction phase of the development.
Bats (roosting)	Disturbance, damage or destruction of bat roosts. Potential for significant impact, scoped in.	We support the recommendation to scope in bats (roosting) into the EIA during the construction phase of the development.
Hazel dormouse (*Muscardinus avellanarius*) and freshwater pearl mussel (Margaritifera margaritifera)	No credible impact pathway identified. Potential for significant impact, scoped out.	We support the recommendation to scope out Hazel Dormouse and Freshwater Pearl Mussel, as we agree that these species are unlikely to be present within, or affected by, the proposed development based on the habitats present and their known local and national distributions.
Fish	Loss of habitat, habitat fragmentation, displacement and habitat disturbance through indirect impacts. Potential for significant impact, scoped in.	We support the recommendation to scope in fish into the EIA during the construction phase of the development.
Otter	Loss of habitat, habitat fragmentation, displacement and disturbance. Potential for significant impact, scoped in.	We support the recommendation to scope in Otter into the EIA during the construction phase of the development.
Water Vole	Loss of habitat, habitat fragmentation, displacement and disturbance. Potential for significant impact, scoped in.	We support the recommendation to scope in Water Vole into the EIA during the construction phase of the development.

Receptor	Scope Justification	Comment
Invertebrates	Loss of habitat, displacement and disturbance. Potential for significant impact, scoped in.	We support the recommendation to scope in Invertebrates into the EIA during the construction phase of the development.
Reptiles	Loss of habitat, displacement and disturbance.	We support the recommendation to scope in reptiles into the EIA during the construction phase of the development.
Other mammals (including hedgehog and brown hare), invertebrates	Loss of habitat, displacement and disturbance. Potential for significant impact, scoped in.	We support the recommendation to scope in other mammals into the EIA during the construction phase of the development.
Biodiversity receptors and designated sites (cumulative)	Combined effects arising from the Proposed Development together with other developments and from multiple impact pathways. Potential for significant impact, scoped in.	We support the recommendation to scope in cumulative impacts upon biodiversity receptors into the EIA during the construction phase of the development.
Operation and maintenance phase:		
International, National and Local Designated Sites	Indirect impacts arising from pollution. Potential for significant impact, scoped in.	We welcome that all potential impact pathways will be assessed as part of the finalised EcIA and HRA. We support the recommendation to scope in International, National and Local Designated Sites into the EIA during the operation phase of the development.
Habitats	Habitat enhancement associated with biodiversity enhancement and habitat management measures. Potential for significant impact, scoped in.	We support the recommendation to scope in habitats into the EIA during both the operation phase of the development.

Receptor	Scope Justification	Comment
Bats	Collision with operational turbines, resulting in mortality or injury. Potential barotrauma associated with turbine operation. Potential for significant impact, scoped in.	We support the recommendation to scope in foraging and commuting bats into the EIA during the operation phase of the development. This will require particular consideration, with reference to up to date research and guidance.
All ecological receptors	Habitat enhancement associated with biodiversity enhancement and habitat management measures. Potential for significant impact, scoped in.	We support the recommendation to scope in all ecological receptors into the EIA during the operation phase of the development.
All other protected and notable species which have scoped in, in Table 6.3	Disturbance from new lighting, maintenance and habitat management. Potential for significant impact, scoped in.	We support the recommendation to scope in all other protected and notable species into the EIA during the operation phase of the development.
Electromagnetic field (EMF) sensitive aquatic species	Operational EMF generated by buried electrical cables could extend into watercourses at cable-crossing locations, potentially affecting the behaviour, navigation or movement of sensitive aquatic species. However, industry-standard design measures will limit EMF exposure. Potential for significant impact, scoped out.	We support the recommendation to scope out EMF sensitive aquatic species during the operation phase of the development.

Receptor	Scope Justification	Comment
Biodiversity receptors and designated sites (cumulative)	Combined effects arising from the Proposed Development together with other developments and from multiple impact pathways. Potential for significant impact, scoped in.	We support the recommendation to scope in all other potential cumulative impacts upon biodiversity receptors into the EIA during the operation phase of the development.
Ornithology, during construction and decommissioning:		
Schedule 1-listed breeding species	Potential disturbance of breeding territories and nesting activity from construction traffic, personnel, noise and vegetation clearance. Potential for significant impact, scoped in.	We support the recommendation to scope in Schedule 1-listed breeding species upon biodiversity receptors into the EIA during the construction and decommissioning phase of the development.
All Breeding Birds	Potential harm to nesting birds from construction activities. Potential for significant impact, scoped in.	We support the recommendation to scope in all breeding bird species upon biodiversity receptors into the EIA during the construction and decommissioning phase of the development.
Other breeding wildfowl and waders	Potential damage to active nests, disturbance during the breeding season and temporary habitat loss. Potential for significant impact, scoped in.	We support the recommendation to scope in Other breeding wildfowl and waders into the EIA during the construction and decommissioning phase of the development, particularly with the close proximity to Ouse Washes SPA, SAC, Ramsar site.

Receptor	Scope Justification	Comment
Passerines and Near-Passerines	Potential damage to active nests, disturbance during the breeding season and temporary habitat loss. However, impacts any impacts are considered temporary and not significant at a population level wider than the site Potential for significant impact, scoped out.	We support the recommendation to scope out passerines and near-passerine bird species into the EIA during the construction and decommissioning phase of the development.
Passage/ Wintering birds	Potential for disturbance, habitat change or degradation affecting wintering populations of regional importance. Potential for significant impact, scoped in.	We support the recommendation to scope in Passage/ Wintering birds into the EIA during the construction and decommissioning phase of the development.
Ouse Washes SPA, Ramsar and SSSI	Potential for disturbance, habitat change or degradation of functionally linked land affecting qualifying bird species. Potential for significant impact, scoped in.	We support the recommendation to scope in the into the Ouse Washes SPA, Ramsar and SSSI, in relation to impacts upon functionally linked land and associated qualifying birds species, during the construction and decommissioning phase of the development.
Somersham Lake LNR	Potential for disturbance and loss of supporting habitat affecting bird species. However, lack of connectivity to the designated feature. Potential for significant impact, scoped out.	We support the recommendation to scope out Somersham Lake LNR into the EIA during the construction and decommissioning phase of the development, as we agree that the local statutory designated sites is a sufficient distance away from the proposed site.

Receptor	Scope Justification	Comment
Berry Fen SSSI	Disturbance and loss of habitat function for notified bird features. However, lack of connectivity to the designated feature. Potential for significant impact, scoped out.	We support the recommendation to scope out Berry Fen SSSI into the EIA during the construction and decommissioning phase of the development, as we agree that the national statutory designated sites is a sufficient distance away from the proposed site.
Ornithological receptors and designated sites (cumulative)	Combined effects arising from the proposed development together with other developments and from multiple impact pathways. Potential for significant impact, scoped in.	We support the recommendation to scope in ornithological cumulative impacts into the EIA during the construction and decommissioning phase of the development.
Ornithology, during operation and maintenance phase:		
All non-passerine Ornithology receptors	Potential collision with operational turbine blades. Potential for significant impact, scoped in.	We support the recommendation to scope in all non-passerine ornithology receptors into the EIA during the operation and maintenance phase of the development.
Passerines and Near-Passerines	Based on relevant guidance, passerine species are not predicted to be significantly impacted. Potential for significant impact, scoped out.	We support the recommendation to scope out all passerine and near-passerine receptors during the operation and maintenance phase of the development.

Receptor	Scope Justification	Comment
All Ornithology Receptors	Potential for barrier effects arising from avoidance of turbines and associated infrastructure. Displacement from foraging, roosting or breeding habitat. Habitat enhancement associated with biodiversity enhancement and habitat management measures. Potential for significant impact, scoped in.	We support the recommendation to scope in the specific ornithology receptors into the EIA during the operation and maintenance phase of the development.
Ornithological receptors and designated sites (cumulative)	Potential combined effects arising from the Proposed Development together with other developments and from multiple impact pathways. Potential for significant impact, scoped in.	We support the recommendation to scope in ornithological cumulative impacts into the EIA during the operation and maintenance phase of the development.

Conclusion:
We agree that biodiversity and nature conservation should be scoped into the Environmental Impact Assessment and support the proposed scope of assessment.

If the Development Consent Order is submitted after 2 November 2026, the development will be subject to the statutory requirement to deliver a minimum 10% Biodiversity Net Gain (BNG). However, regardless of whether the mandatory BNG requirement applies, opportunities to deliver measurable biodiversity gains should be sought and embedded within the scheme wherever practicable.

In addition, the development should secure appropriate avoidance, mitigation, compensation and enhancement measures for protected species, as well as Priority and other threatened species. The assessment should clearly demonstrate how biodiversity considerations and ecological enhancements have been incorporated into the design

process, and how opportunities to secure meaningful and measurable gains for biodiversity have been maximised throughout the lifetime of the development.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Yours sincerely,

[redacted] **ACIEEM BSc (Hons)**
Senior Ecological Consultant
Place Services at Essex County Council

Place Services provide ecological advice on behalf of Huntingdonshire District Council.

Please note:

This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

We are unable to respond directly to applicants/agents or other interested parties. Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.

Place Services have a policy relating to the use of AI. Unless otherwise stipulated, any AI use will be limited to basic proof-reading, grammar, and spelling correction. This response has been reviewed by the author(s). If you have any queries, please contact us for information about our AI guidance.

HDC Reference: 26/70009/SCOP

Appendix C: Landscape comments on the Applicant's EIA Scoping Report by Place Services on behalf of Huntingdonshire District Council

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
www.placeservices.co.uk

Huntingdonshire District Council
Pathfinder House
St Mary's Street
Huntingdon
Cambridgeshire
PE29 3TN

Our ref: 23164
Date: 16 October 2026

For the attention of: [redacted]

Application ref:	26/70009/SCOP
Location:	Land At Chatteris Fen Chatteris Road Somersham
Proposal/Description:	This application is not being determined by Huntingdonshire District Council - Planning Inspectorate Reference EN0110041 Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) Regulations 10 and 11 Proposed application by Vattenfall Wind Power Limited (the applicant) for an Order granting Development Consent for the Chatteris 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 with Place Services on the above Scoping Opinion. This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

This review is based on a desktop study of the above-referenced application and its submitted documents. Our Landscape comments are as follows:

1.0. Site Context

1.1. The site is located directly adjacent to the Huntingdonshire District administrative boundary and comprises a wide landscape of arable farmland extending across both East Cambridgeshire District Council and Fenland District Council to the east of Huntingdonshire.

1.2. The site comprises several areas of Fen intersected by a network of watercourses. There are several Public Rights of Way within and adjacent to the site.

2.0. Planning Policy Context

2.1. Huntingdonshire's Local Plan to 2036 (May 2019)
Whilst located outside of the Huntingdonshire District Boundary, the following policies are of landscape relevance [among others]: LP3: Green Infrastructure, LP10: The Countryside.

3.0. Review of the proposal/submitted information:

3.1. We have reviewed the submitted Chatteris Wind Farm EIA Scoping Report and various appendices. Whilst the site lies outside of the Huntingdonshire District, the proposed turbines may give rise to adverse landscape and visual effects.

3.2. Landscape and Visual is outlined within section 9 of the EIA Scoping Report. The methodology that will be used to undertake the Landscape and Visual Impact Assessment (LVIA) is outlined in Appendix C Section 5 Landscape and Visual. We note that the value of the landscape receptor is based upon designation as a starting point. We would instead advise that TGN 02/21 Assessing Landscapes Outside of National Designations is used with regards to assessing value to avoid any possible underassessments for areas outside of designations.

3.3. Section 5.6 of Appendix C outlines that a number of visualisations will be included to illustrate the predicted changes in views. These include wirelines and photomontages which is welcomed. We would advise that the NatureScot guidance for windfarm visualisations is reviewed with regard to visual representation of windfarms, as best practice.

3.4. Para 5.6.2 of Appendix C outlines that wirelines will include existing and proposed windfarms that will be identified within the cumulative LVIA. We would advise that cumulative photomontages are also considered within the assessment.

3.5. The proposed LVIA study areas are outlined in Figure 9.1. This shows a Study Area of up to 10km from the outermost turbines and includes areas within Huntingdonshire which is welcomed. The figure also outlines a 30km visual effects Study Area which also extends into the Huntingdonshire District. This is welcomed.

3.6. Para 9.3.1 outlines the Landscape and Visual baseline, this includes the Huntingdonshire Landscape and Townscape SPD alongside national and local landscape designation information where available and applicable. Para 9.3.16 outlines that 5 Landscape Character Areas (LCAs) within the Huntingdonshire Landscape and Townscape SPD are relevant, these include: The Fens; Fen Margin; Central Claylands; Great Ouse Valley; and South East Claylands.

3.7. Para 9.3.25 outlines that Local Landscape Designations and Landscape-Related Designations will be assessed under the appropriate ES Chapter. These are noted as including Registered Parks and Gardens, Local Wildlife Sites, SSSI, SPA, SAC, Listed Buildings, Scheduled Monuments and Conservation Areas. However, para 9.3.26 states

that Huntingdonshire District has no current Local Landscape Designations. The only Local Landscape Designations identified as Ouse Washes Special Protection Area and Site of Special Scientific Interest (SSSI). This is incorrect. Upon review of the Huntingdonshire interactive map the following landscape related designations are of relevance [among others]: Holme Fen National Nature Reserve and SSSI; Monks Wood National Nature Reserve and SSSI; Woodwalton Fen National Nature Reserve and SSSI; Abbots Ripton Hall Grade II Listed Park and Garden; Hilton Maze Grade II Listed Park and Garden.

3.8. Paragraph 9.3.32 outlines the settlements from where the LVIA will consider visual effects. We welcome that a number of settlements in Huntingdonshire have been considered. A Residential Visual Amenity Assessment (RVAA) will also be included within the LVIA appendix.

3.9. The EIA scoping report outlines a number of receptors to be considered which includes users of open access land, promoted routes, National Cycle Networks and various attractions and promoted viewpoints.

3.10. Para 9.3.47 states that viewpoints have been chosen to cover [amongst others] short, medium and long-range views. Within Huntingdonshire the following viewpoints have been chosen VP2, VP3, VP7, VP8, VP10, VP11, VP14. We note that no viewpoints have been included from any further than 10km within the Huntingdonshire district. The ZTV clearly shows that there are likely to be views from up to 30km away and therefore we would welcome some further distance viewpoints to be considered.

3.11. Furthermore, no viewpoints have been included from the landscape designations highlighted in paragraph 3.4 of this response, we would expect these receptors to be scoped in to the assessment. There are several locally valued green spaces and other designations however we note the large range of views and appreciate that the assessment should be proportionate. However, all National Nature Reserves and Registered Parks and Gardens in the Huntingdonshire District that could have views towards the proposals should be scoped in.

3.12. The proposals include a BESS, whilst we note this is iterative at this stage it would be helpful to see an outline of where this is proposed to be located to ensure that landscape and visual harm is appropriately assessed.

3.13. The site is located within a dark skies area, and therefore if lighting is to be proposed night-time effects should be assessed.

4.0. Summary

4.1. To summarise, while the proposed Chatteris Wind Farm lies outside Huntingdonshire District, it has the potential to generate landscape and visual effects within the district. Overall, the scope of the proposed Landscape and Visual Impact Assessment (LVIA) is welcomed, particularly the inclusion of a 10km landscape study area, a 30km visual effects

study area extending into Huntingdonshire, and the assessment of several Huntingdonshire Landscape Character Areas. The proposed use of wirelines and photomontages is also supported, alongside the inclusion of a Residential Visual Amenity Assessment. However, the assessment methodology should make use of Landscape Institute Technical Guidance Note 02/21 when considering landscape value outside of designated landscapes, and cumulative photomontages should be included in addition to cumulative wirelines. Reference should also be made to NatureScot guidance on wind farm visualisations.

4.2. Several aspects of the baseline information and viewpoint selection require further consideration. The scoping report incorrectly states that there are no local landscape designations within Huntingdonshire, overlooking nationally important landscape-related assets such as Holme Fen, Monks Wood and Woodwalton Fen National Nature Reserves and SSSIs, together with Registered Parks and Gardens including Abbots Ripton Hall and Hilton Maze. These receptors should be included within the LVIA and viewpoints should be selected to represent them. No Huntingdonshire viewpoints beyond 10km have currently been proposed despite the Zone of Theoretical Visibility indicating potential visibility out to 30km. In addition, the location of the proposed Battery Energy Storage System (BESS) should be identified to allow its landscape and visual effects to be properly assessed, and a night-time assessment should be undertaken if lighting is proposed, given the site's location within a dark skies area.

Please contact us if you have any queries in relation to this advice.

Place Services – Landscape Team

Email: landscape@essex.gov.uk

This advice has been provided by Place Services on behalf of Huntingdonshire District Council.

Please note:

This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

We are unable to respond directly to applicants/agents or other interested parties. Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.

Place Services have a policy relating to the use of AI. Unless otherwise stipulated, any AI use will be limited to basic proof-reading, grammar, and spelling correction. This response has been reviewed by the author(s). If you have any queries, please contact us for information about our AI guidance.

Appendix D: HDC Conservation Officer's comments on the Applicant's EIA Scoping Report

HDC Conservation Consultation

Proposal:		**Location:**
Erection of up to 15 wind turbines and associated infrastructure.		Chatteris Wind Farm
Case Officer:	**Conservation Officer:**	**HDC Application Ref. No:**
LP	NA	26/70009/SCOP

Introduction:

The proposed development is likely to consist of 15 turbines, each with a tip height of up to 220 m, a battery energy storage system (BESS), an on site substation, and other associated infrastructure. The wind farm is anticipated to have an installed generating capacity of up to 126 MW. The proposed site is south of Chatteris and lies just to the east of the Huntingdonshire District boundary.

Historic Context:

The proposed wind farm will be located in an area of Fen drained by the Merchant Adventurers and Dutch engineer Cornelius Vermuyden in the 1650s. Earith is a settlement of primary importance in this period as it marks the interception of the River Great Ouse by the 'Washes' dug by Vermuyden's labourers to direct the fen waters to The Wash. Prior to this work the fens had been wetlands occupied since at least the Bronze Age and used for seasonal grazing, hunting, fishing, fowling and the collection of wetland vegetation for fuel, craftwork, food and building materials. Medieval and later habitation generally occurred on 'islands' of higher land located along the fen edge, often connected by causeways and lodes.

Since the draining of the Fens, and subsequent enclosure, arable and grazing have been the principal forms of agriculture leading to a flat rural landscape interspersed with drains and droves. The Fen setting to Huntingdonshire fen edge villages and towns is therefore a key component of their historic and architectural significance.

This context is more fully explored in the Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022.

Impact:

Within Huntingdonshire the principal impact of the proposed scheme is likely to be on the settings of designated heritage assets associated with Somersham, Colne and Earith. The size of the proposed turbines is such that they may also impact the settings of heritage assets in Pidley, Bluntisham, Woodhurst and Warboys. The submitted ZTVs suggest that the turbines may be visible



A Mapp of ye Great Levell of ye Fenns by [redacted], 1658. Higher land is demarked by a thick green line. Subdivision of fen land is in lots; elsewhere enclosure is ascribed to the new owners. Approximate location of proposed site boundary and turbine locations in white.

as far as St Ives and Ramsey and therefore it may be possible that the settings of heritage assets within these towns could be affected.

Review of submitted information:

EIA Scoping Report

The Chatteris Wind Farm EIA Scoping Report and various appendices have been reviewed. Although the site lies outside of the boundary of Huntingdonshire District, the proposed turbines may give rise to an adverse impact on the significance of designated and non-designated heritage assets within the district. This impact will be confined to changes within the settings of heritage assets.

8.3.6 Considers the impact of the development on the significance of heritage assets beyond the 10km Study Area. “These assets will be considered, where relevant, in relation to the contribution that setting makes to their significance, informed by the Zone of Theoretical Visibility, Site visits and the Landscape and Visual assessment”. This level of assessment is welcomed. However, I do not see a written commitment to this level of assessment for heritage assets within the 10km Study Area. The methodologies shown in Table 8.2 do not appear to include the use of Landscape study tools in the assessment of impact to the settings of heritage assets. These would include the use of wireframe models and photomontages from specifically chosen viewpoints within or adjacent to heritage assets to allow an accurate assessment of this impact to be fully understood. Figures 9.8 and 9.10 of Appendix A show proposed viewpoints for assessment of landscape impact and while some are close to heritage assets this is unlikely to be sufficient to assess the impact to the settings of some heritage assets.

In general there is a need to integrate the landscape and heritage assessments to inform the impacts on the Fen edge settlements as an historic landscape in totality.

Table 8.2. The applicants’ approach to assessing those heritage assets likely to be impacted and the scale of harm to their significance during operation and maintenance follows national policies and professional guidelines. The impact assessment of the proposed windfarm on heritage assets up to 10km from the site is acceptable. The acknowledgement that this process is iterative and that the 10km study area should be increased for specific heritage assets where longer views of the turbines may impact their significance is welcomed. The intention to assess cumulative impact on heritage assets is welcomed.

Appendix A: Figures

Figure 8.1h (1); Figure 8.1h (2); Figure 8.1i (1); Figure 8.1i (3); Figure 8.1k (1); Figure 8.1k (2); Figure 8.1k (3); Figure 8.1l (1)

It is unclear why the Grade II listed buildings have been subdivided from Grade II* and Grade I listed buildings on these maps. The approach is not consistent. Some figures offer keys for Grade II listed

buildings but these do not appear on the map. A more logical approach to presentation is called for going forward.

Appendix B

4 Cultural Heritage and Archaeology

4.1 Legislation, Policy and Guidance

I have reviewed the Legislation, Policy and Guidance. At a national level these are complete however I do not see reference to Policy LP34 of the Huntingdonshire Local Plan to 2036 or to the Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022. Both documents cover impact to settings of heritage assets and landscapes.

Appendix C

4.3.1 The proposed move away from the more traditional 'scalar', matrix-led approach to assessing impact is welcomed. Experience of this approach elsewhere has underlined its limitations and the proposed descriptive, qualitative presentation of the changes to heritage significance is supported.

4.4.3 In reference to the sieving exercise for heritage assets: "They must share intervisibility or a material non-visual association with the Proposed Development". There is a danger that this approach misses or underplays impacts upon the settings of heritage assets. "Material non-visual association" is a phrase that requires clarification. I note that the PPG states that "*The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places*". Experience of previous wind farm developments underlines the significant impact of movement and noise in the settings of heritage assets. A clarification of the methodology for the sieving exercise in light of the Historic Environment Good Practice Advice in Planning Note 3 is necessary.

Conclusion:

The impact of the proposed Chatteris windfarm will be to the settings of heritage assets within Huntingdonshire. In general the approach considered in the scoping report is acceptable but the following aspects should be reconsidered or clarified:

1) Use of wireframe modelling and photomontages specifically tailored to heritage receptors.
2) An integrated approach to the impact on landscape and heritage assets.
3) A consistent and logical approach to presenting heritage datapoints in mapping.
4) Reference to the Huntingdonshire Local Plan to 2036 and the Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022.
5) A clarification of the methodology to be used in the sieving exercise.

Ministry of Defence

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

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

www.mod.uk/DIO

Your reference: EN0110041

Our reference: [redacted]

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

27 October 2026

By email only

Dear [redacted],

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

Proposed application by Vattenfall Wind Power Limited (the applicant) for an Order granting Development Consent for the Chatteris 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) on the above Scoping Opinion request in respect of the Chatteris Wind Farm development. The consultation was received by this office on 29 September 2026. I write to confirm the safeguarding position of the MOD regarding information that should form part of any Environmental Impact Assessment submitted in support of an application.

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.

The Chatteris Wind Farm Environmental Impact Assessment (EIA) Scoping Report dated September 2026 (the Scoping Report) covers all aspects of the project.

The proposed development is located approximately 2.5 kilometres (km) south of Chatteris, in the vicinity of Mepal, Somersham and Sutton in the county of Cambridgeshire. The 15 turbines forming the subject of this application each have a maximum height to blade tip of 220 metres (m) above ground level (agl). In addition to the wind turbines, the application proposes an on-site substation, transformers, switchgear, buried cabling, and a Battery Energy Storage System (BESS), along with temporary construction compounds, access, highways work, landscaping, habitat management and other ancillary infrastructure works. The proposal does not address in detail the Grid Connection related to this application; this will be subject to a separate application and consultation.

Through the Scoping Report, the applicant highlights various relevant stakeholders, and the MOD is identified as a relevant receptor in Chapter 16 Aviation, Radar and Telecommunications.

The Scoping Report relates to the wind turbines and on-site electrical infrastructure and recognizes some of the principal defence issues relevant to MOD consideration of the proposed development.

At Chapter 16, Table 16.1, it is identified that the proposed wind turbines have the potential to affect and be detected by a number of military radars, both Primary Surveillance Radars (PSR) and Secondary Surveillance Radars (SSR) used for Air Traffic Control purposes.

The PSRs at RAF Lakenheath, RAF Marham, RAF Wittering, RAF Honington and RAF Cranwell have been acknowledged and identified as within range, along with the SSR at RAF Lakenheath. Technical assessments completed by the MOD have identified that the wind turbines are radar line of sight for the PSRs at RAF Lakenheath, RAF Marham, RAF Wittering and RAF Cranwell.

Following operational assessments, the MOD can advise that the PSR at RAF Cranwell can be scoped out, as can the PSR at RAF Honington and the SSR at RAF Lakenheath. The PSRs at RAF Lakenheath, RAF Marham and RAF Wittering must, however, remain scoped in; the MOD acknowledges the applicant's position to scope these impacts into any Environmental Impact Assessment as stated at Chapter 16 (Table 16.3), and MOD supports this approach.

The potential for the development to create physical obstacles, during both the implementation and operational stages of the development, to low flying aircraft has been acknowledged by the applicant within Chapter 16. Specific reference is made in Table 16.1 and Table 16.2, to scope in the effects on military low flying aircraft into the assessment of Military and Civil Aviation. It is also acknowledged by the applicant in their Scoping Report at Chapter 2 Project Description (Paragraph 2.2.10) that, due to the height of the proposed wind turbines, an aviation lighting scheme would be required in accordance with the Air Navigation Order 2016. The MOD would support the applicant's approach to these matters.

I trust this adequately explains our position on the proposed development as laid out in the Chatteris Wind Farm EIA Scoping Report submitted in support of the application.

Yours sincerely,

[redacted]

[redacted]
Assistant Safeguarding Manager

From: box.assetprotection <box.assetprotection@nationalgas.com>
Sent: 30 September 2026 15:35
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Subject: RE: EN0110041 Chatteris Wind Farm EIA Notification

You don't often get email from box.assetprotection@nationalgas.com. Learn why this is important

[redacted]

Thank you for your email.

Regarding EN0110041, there are no National Gas Transmission assets in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

[redacted]
Asset Protection, National Gas Transmission

[redacted]
[redacted]@nationalgas.com

National Gas Transmission, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA
nationalgas.com I **Twitter** I **LinkedIn**

Please consider the environment before printing this email.

National Gas | Business Use

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Warwick Technology Park
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Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
ChatterisWindFarm@planninginspectorate.gov.uk

26 October 2026

Dear Sir/Madam

RE: APPLICATION BY Vattenfall Wind Power Limited (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE Chatteris Wind Farm (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 29th September 2026 regarding the above Proposed Development.

This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

NGET has no existing apparatus within or in close proximity to the proposed site boundary but would like to be kept informed as the proposal progresses.

We enclose a plan showing our nearest infrastructure.

If you require any further information, please do not hesitate to contact the Land Development Liaison team.

Yours faithfully,

[redacted]

[redacted]
Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

[redacted]
Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

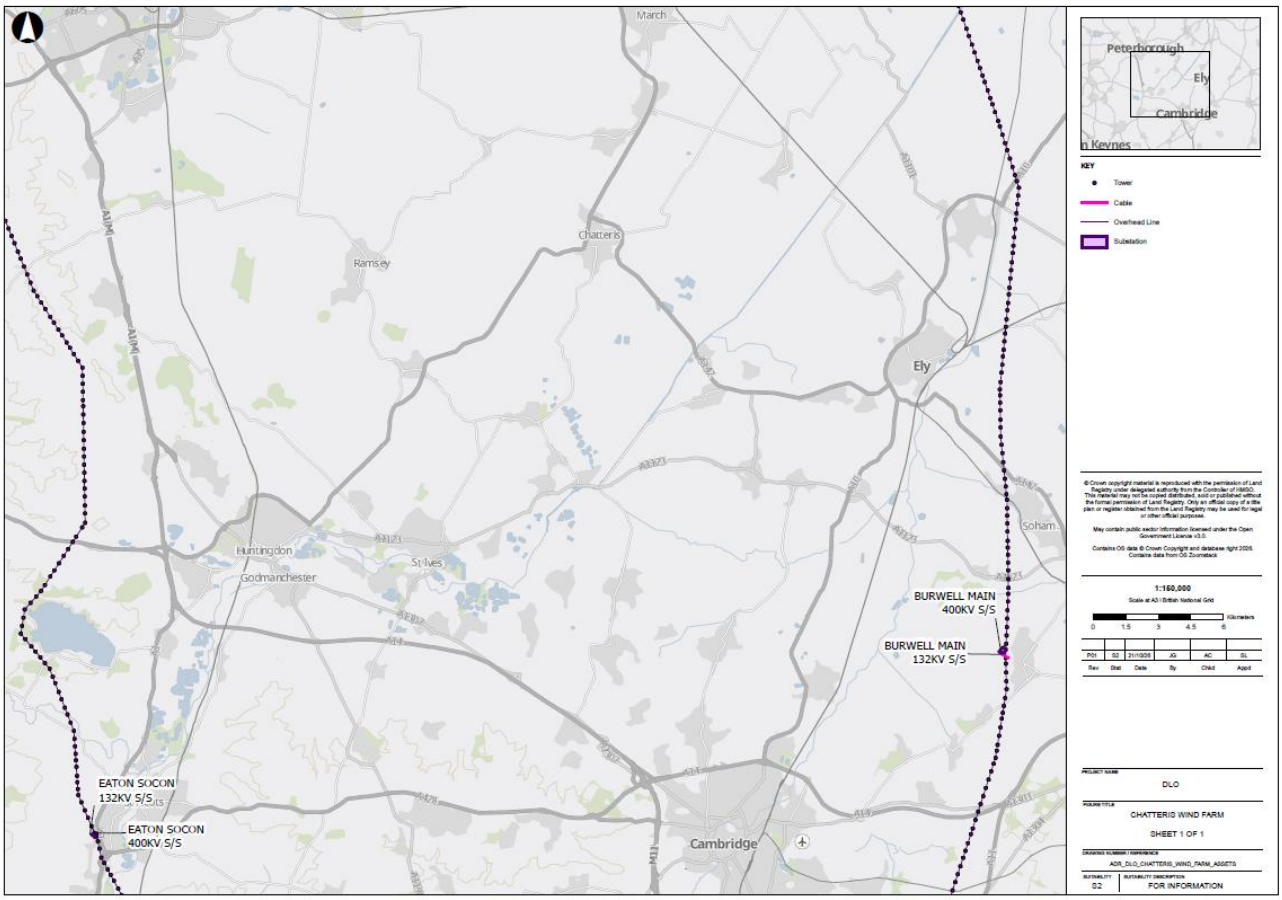

Figure 1: NGET Assets

Technical Guidance Note 287

Third-party guidance for working near National Grid Electricity Transmission equipment



Purpose and scope **3**
Contact National Grid 3
How to identify specific National Grid sites 3
Plant protection 3
Emergencies 3

Part 1 – Electricity Transmission infrastructure **4**
Overhead lines 4
Underground cables 4
Substations 4

Part 2 – Statutory requirements for working near high-voltage electricity **4**
Electrical safety clearances 4
Your Responsibilities – Overhead Lines 5

Part 3 – What National Grid will do for you and your development **6**
Provision of information **6**
Drawings 6
Risk of impact identification 6
Risks or hazards to be aware of **7**
Land and access 7
Electrical clearance from overhead lines 7
Underground cables 8
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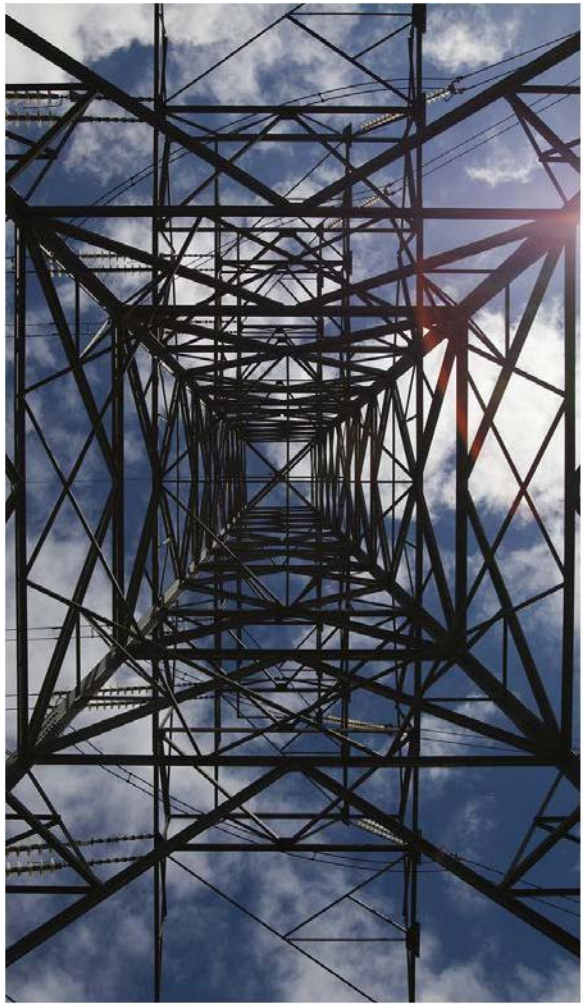


Disclaimer
National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.

Purpose and scope

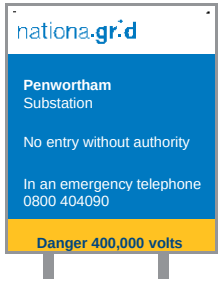
The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations
The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines
The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: [redacted]

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment

Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.

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Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could ‘flashover’ and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, ‘avoiding danger from overhead power lines’, and any legislation which is relevant to the work you are completing.

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What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.

400kV

The maximum nominal voltage of the underground cables in National Grid's network



Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: [redacted]

Electrical clearance from overhead lines

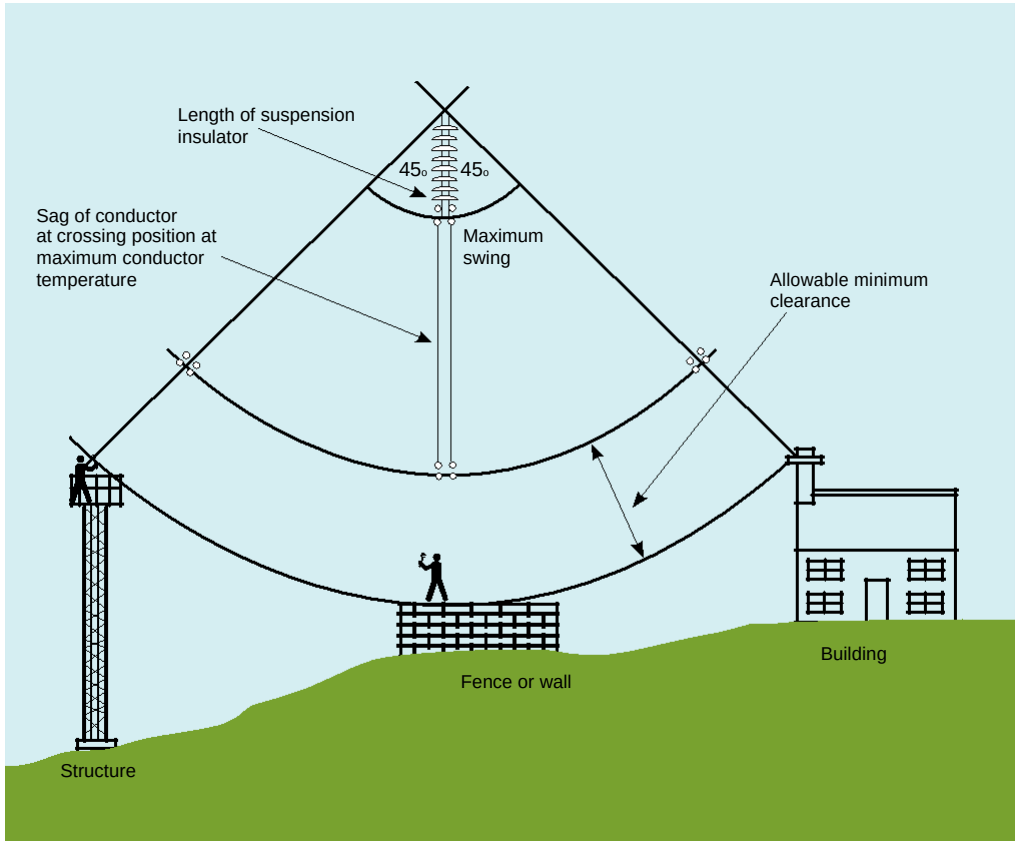
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

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The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be layed in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum seperation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed.
In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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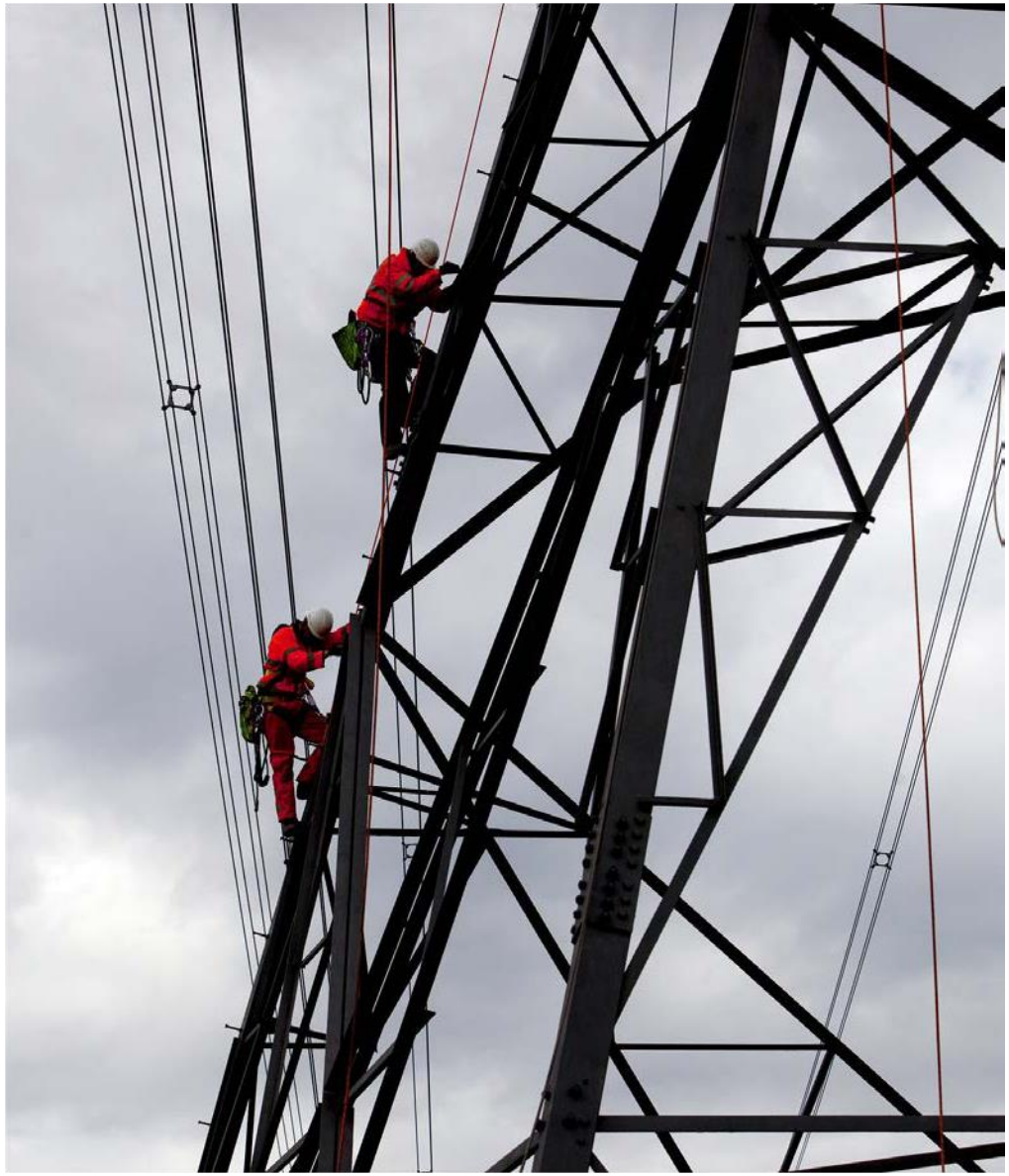

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Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire *(as outlined in ENA TS 43-8)*.

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit **www.emfs.info.**



200m

The minimum distance that should be maintained from National Grid assets when quarry blasting

Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice.* The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

(i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line

(ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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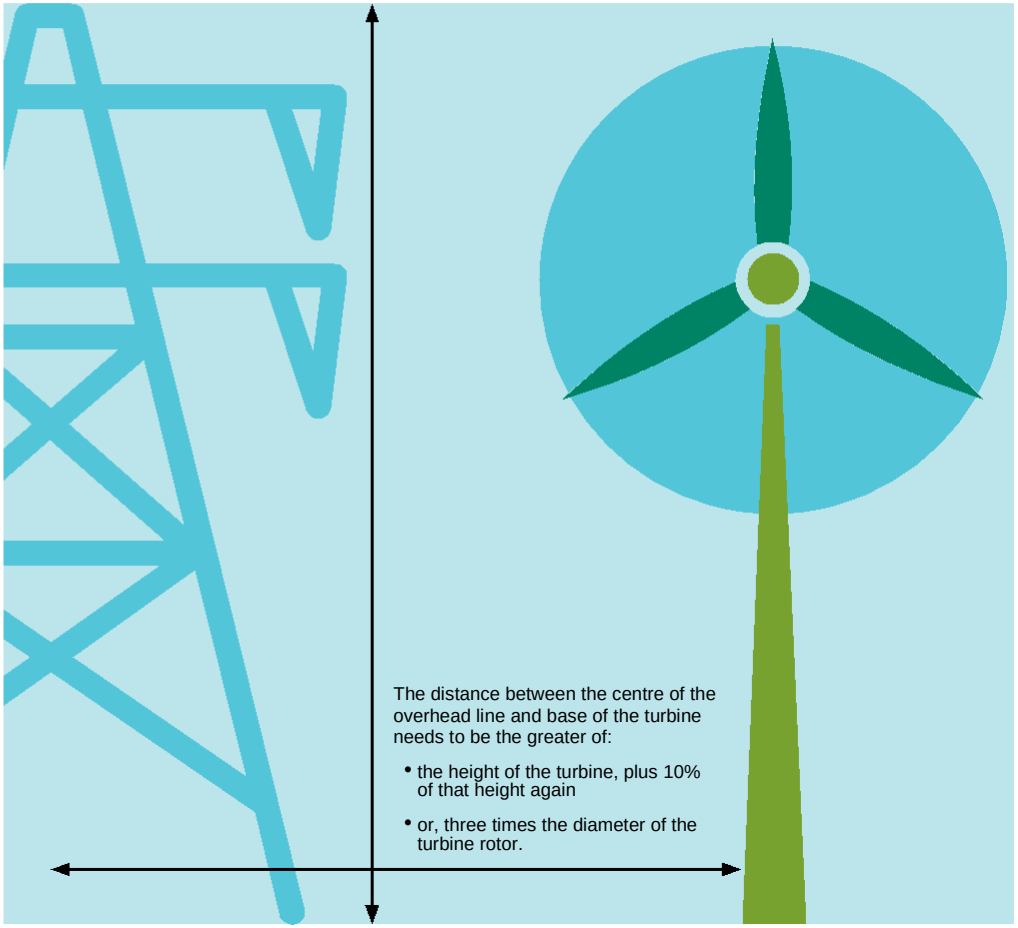
Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line

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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

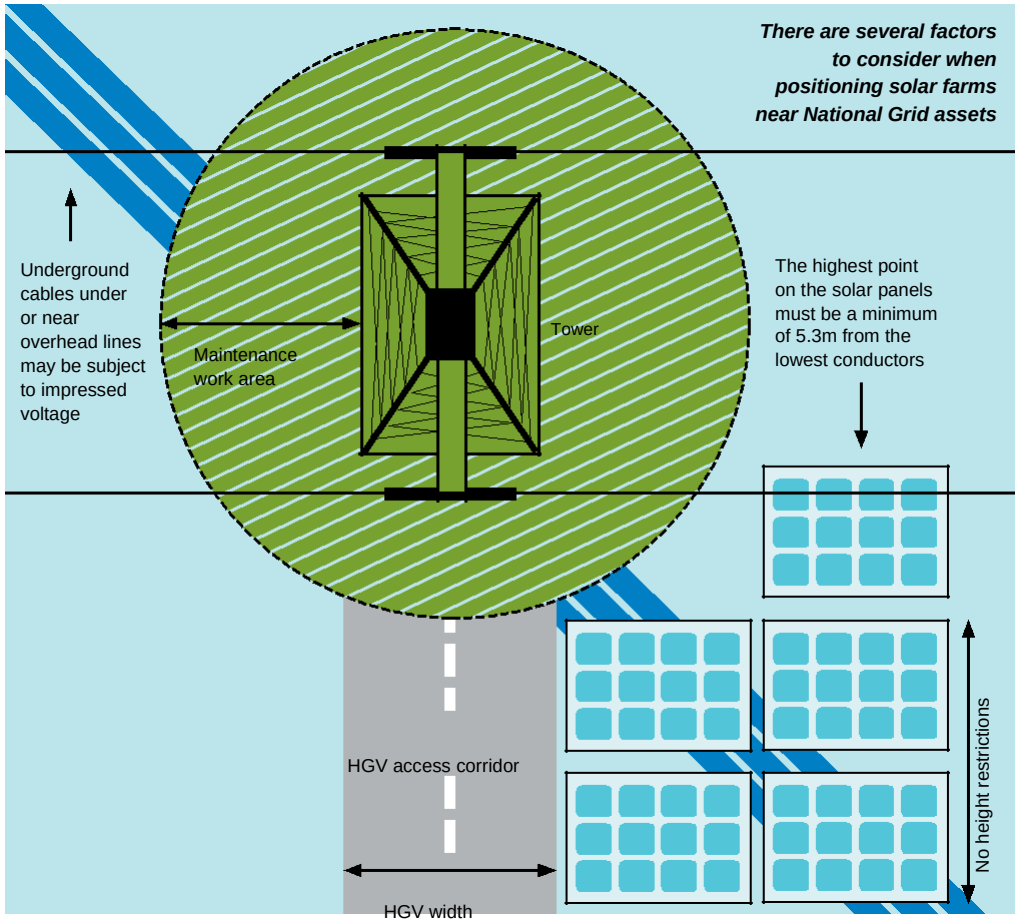
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles, including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.

Diagram not to scale



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)[1]
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

[1] It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
[redacted]

Opening hours:
Monday to Friday 08:00-16:00

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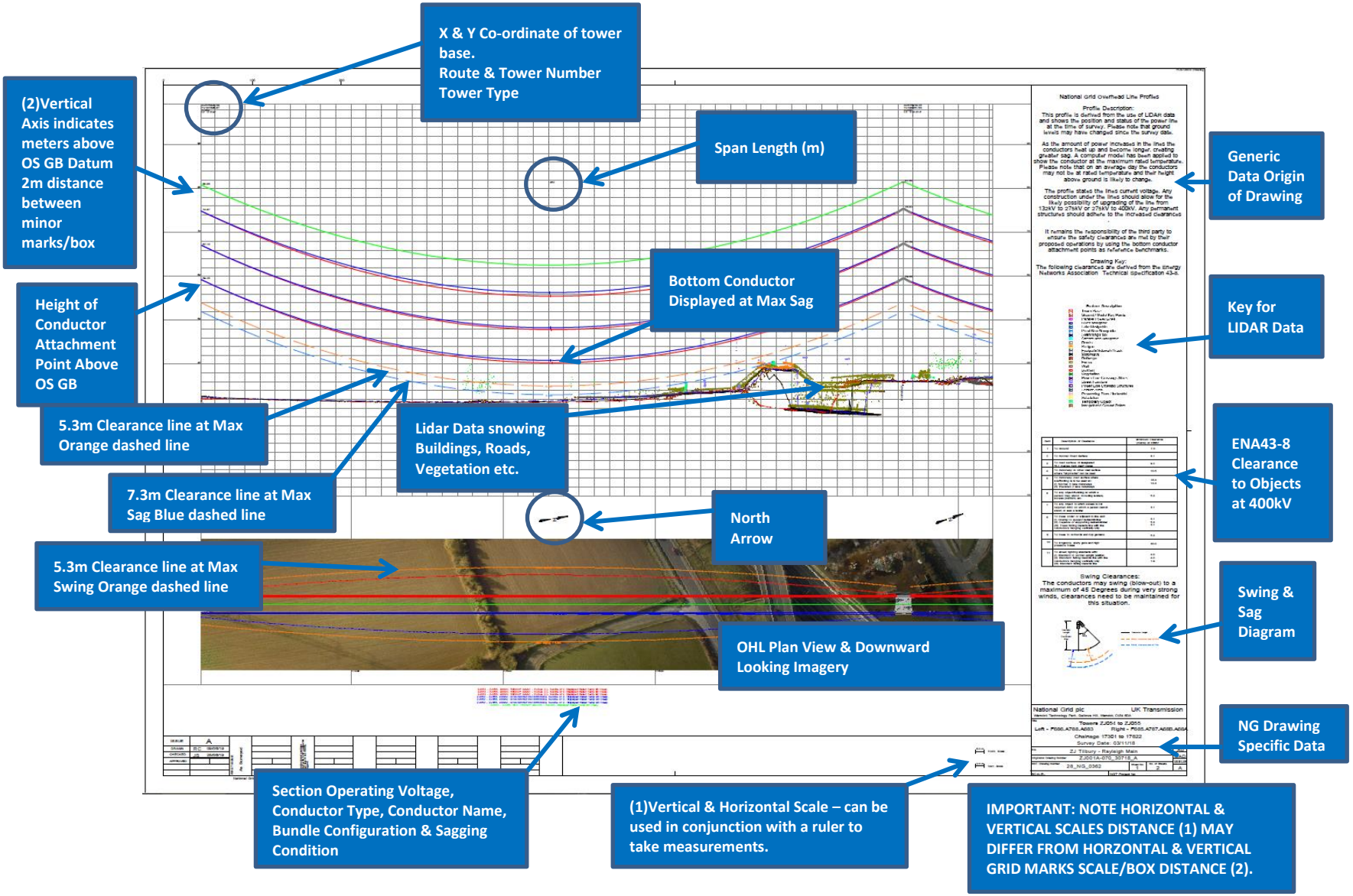
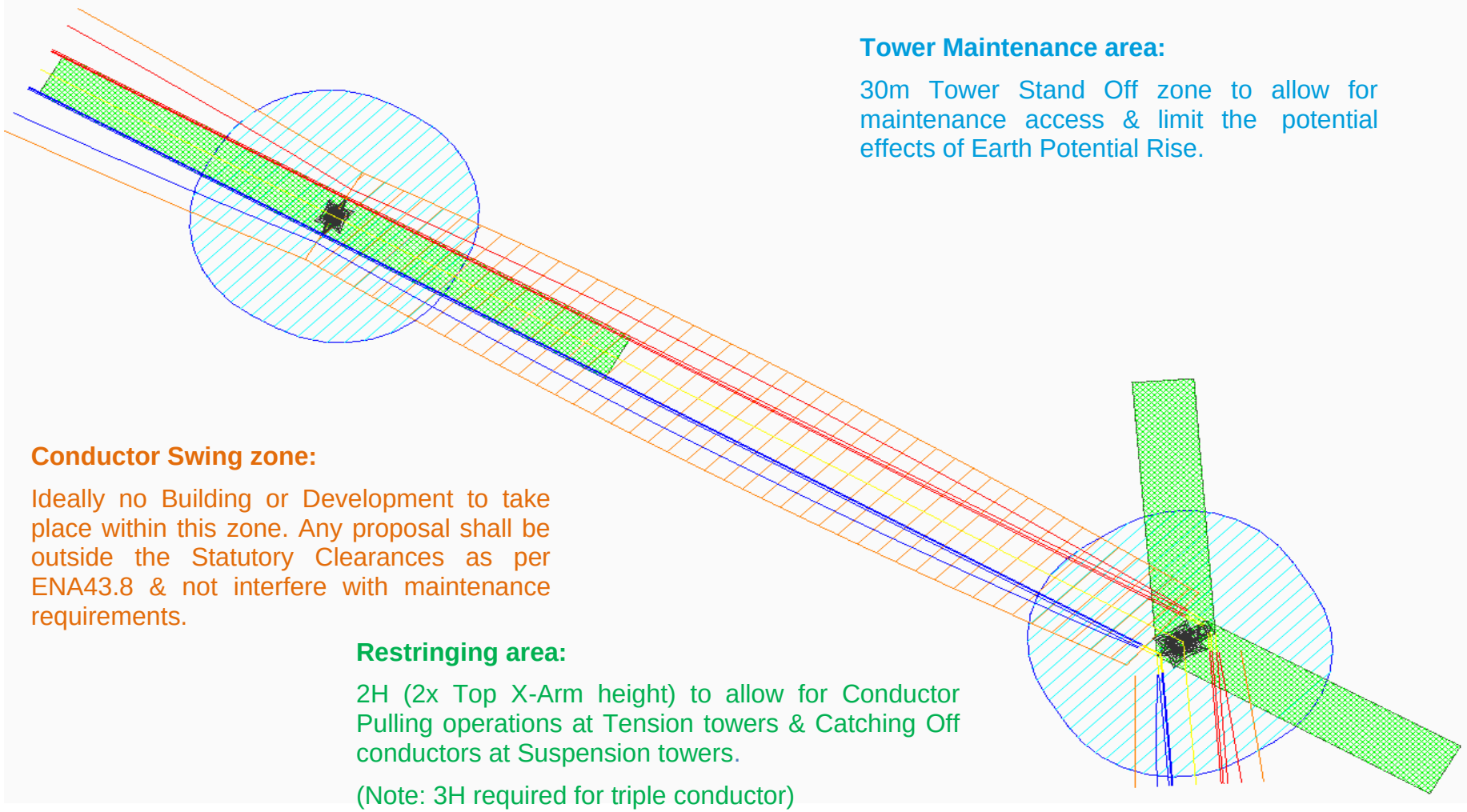
14 APPENDIX A

OHL Profile Drawing Guide



15 APPENDIX B

OHL Tower Stand Off & Reconductoring Area



Tower Maintenance area:

30m Tower Stand Off zone to allow for maintenance access & limit the potential effects of Earth Potential Rise.

Conductor Swing zone:

Ideally no Building or Development to take place within this zone. Any proposal shall be outside the Statutory Clearances as per ENA43.8 & not interfere with maintenance requirements.

Restringing area:

2H (2x Top X-Arm height) to allow for Conductor Pulling operations at Tension towers & Catching Off conductors at Suspension towers.

(Note: 3H required for triple conductor)

NH Ref: NH/26/18205
Planning Inspectorate Reference: EN0110041

Email:
chatteriswindfarm@planninginspectorate.gov.uk

Operations (East)
National Highways
Woodlands
Manton Lane
Bedford MK41 7LW

27 October 2026

National Highways formal response to Chatteris Wind Farm DCO EIA Scoping Report

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

Dear Sir/Madam

Thank you for consulting National Highways on the EIA Scoping Report for the proposed Chatteris Wind Farm, submitted by Vattenfall Wind Power Limited, as part of the scoping process under the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

National Highways is responsible for operating, maintaining and improving England's Strategic Road Network (SRN). Having reviewed the information available at this stage, we provide the following comments to inform the scope of the Environmental Statement (ES).

National Highways has reviewed Chapter 13 (Traffic and Access) of the EIA Scoping Report, and it is noted that the chapter identifies potential interaction with the local road network and primary routes within the local area. We recommend that consideration is made towards strategic routes including the SRN with regard to construction / decommissioning phase trips.

Based on the information reviewed to date, National Highways agrees that Traffic and Access should remain scoped into the Environmental Impact Assessment (EIA) given the scale, geographical extent and duration of construction activities proposed, together with the potential for construction traffic, workforce travel and abnormal load movements to affect the operation, capacity and safety of the SRN.

National Highways notes that the assessment methodology is currently high level and that further refinement of the study area, traffic forecasting assumptions, construction routing strategy and assessment scenarios will be undertaken as the design progresses through the Environmental Statement (ES) stage. We would appreciate ongoing engagement with regard to traffic forecasting and assessment methodology is welcomed as the scheme progresses, even if the SRN is not included within the study area.

National Highways advises that the ES and supporting Transport Assessment (TA) should include a highway study area agreed with the Local Highways Authority and National Highways. The study area should include all links and junctions where traffic associated with the Proposed Development could result in a material impact on safety, capacity or operation. This should include consideration of:

- Identification and assessment of links and junctions, which may include the SRN, where construction traffic associated with the Proposed Development is forecast to result in a material increase in traffic demand or operational impacts; and
- Any other SRN locations identified through traffic assignment modelling.

National Highways welcomes the Applicant's intention to identify a robust worst-case construction scenario. The TA should clearly define:

- Peak construction year;
- Peak daily two-way HGV movements;
- Peak workforce numbers;
- Peak daily staff vehicle trips;
- Temporal overlap of multiple construction work fronts;
- Construction material sourcing assumptions; and

Particular attention should be given to cumulative construction activities occurring simultaneously across multiple project components, as these may represent the realistic worst-case impact on the SRN.

National Highways notes the intention to use empirical traffic counts, TEMPro growth forecasts and, where appropriate, outputs from the Suffolk County Transport Model. The Applicant should agree with National Highways:

- Baseline year;
- Assessment years;
- Committed development assumptions;
- Forecast growth assumptions;
- Junction assessment requirements; and
- Any strategic modelling requirements necessary to understand cumulative impacts on the SRN.

The proposed HGV routing strategy should be developed in consultation with National Highways and the relevant Local Highway Authorities. The Construction Traffic Management Plan (CTMP) should demonstrate:

- Appropriate use of the SRN for longer-distance HGV movements;
- Minimisation of impacts on local communities where practicable;
- Suitable routing between the SRN and all principal compounds and access points;
- Management of any temporary traffic management affecting SRN operation;
- Details of any proposed temporary traffic management measures in proximity to the SRN and demonstration that such measures would not adversely affect the safe and efficient operation of the network;
- Mitigation measures to reduce the number of construction-related trips on the SRN during peak periods, including both workforce and freight movements; and
- Measures to reduce single-occupancy vehicle trips by construction workers, including workforce travel planning measures, opportunities for shared transport, shuttle bus provision where appropriate, car sharing initiatives and suitable staff parking management arrangements.

The Scoping Report identifies the potential requirement for Abnormal Indivisible Loads (AILs) associated with construction plant and equipment. National Highways advises that the following should be set out within the CTMP/ supporting documents:

- The likely nature, scale and frequency of abnormal loads;
- An outline Abnormal Indivisible Load Strategy, including identification of likely ports of entry, indicative routes to construction compounds, route constraints and any anticipated mitigation requirements;
- Any required mitigation works on the SRN should be identified at an early stage; and
- Engagement should continue with National Highways regarding route approvals and movement management arrangements.

National Highways supports the proposed review of Personal Injury Collision (PIC) data. The assessment should specifically consider:

- Existing collision clusters on affected SRN links and junctions within the most recent five-year period;
- Potential effects arising from increased construction traffic associated with peak construction activities;
- Temporary construction accesses and crossings, where applicable; and
- Any requirement for Road Safety Audits associated with alterations to SRN infrastructure, where applicable.

Where construction activities interfere with SRN facilities used by pedestrians, cyclists and equestrians, the Applicant should demonstrate that safe and convenient movement is maintained throughout the construction period and that any required diversions are appropriately designed, signed and managed.

National Highways welcomes the proposed cumulative assessment approach. The ES should include cumulative assessment with committed and reasonably foreseeable developments which may affect the same sections of the SRN, including other Nationally Significant Infrastructure Projects (NSIPs), major energy infrastructure projects, Sizewell-related development and strategic housing and employment growth proposals within Cambridgeshire, Suffolk and Norfolk.

National Highways notes the Applicant's proposal to scope out most operational traffic effects associated with the windfarm assets and several decommissioning effects on the basis that traffic generation would be negligible. National Highways has no in-principle objection to this approach, subject to the TA demonstrating through forecast traffic data that operational traffic associated with the AWRP, CSR and WSR would not result in material effects on the SRN and that maintenance activities would remain de minimis.

Based on the information currently available, National Highways agrees that Traffic and Access should be scoped into the EIA. National Highways generally agrees with the proposed assessment methodology, the identification of receptors and the approach to considering construction traffic effects. However, further engagement with National Highways will be required as the design develops to agree the final study area, traffic forecasting assumptions, traffic assignment methodology, construction scenarios, cumulative developments, modelling requirements and the extent of SRN junction assessment.

National Highways therefore offers no objection to the proposed scope of the Traffic and Access assessment. The matters identified within this response should be considered during the preparation of the ES, TA, CTMP and associated application documents to ensure that the impacts of the Proposed Development on the safe and efficient operation of the SRN are appropriately assessed and, where necessary, mitigated.

Subject to the above, National Highways has no further comments at this stage but requests ongoing engagement as the application progresses.

Please note, this response should not be interpreted as confirming the acceptability of the development proposal or its impacts on the SRN. These matters will be considered once the supporting information have been submitted and reviewed.

Yours sincerely

[redacted]

[redacted]
Spatial Planner
National Highways
Operations (East)

Prepared by:
NATS Safeguarding Office

Technical and Operational Assessment (TOPA)

For Chatteris Wind Farm

Wind Farm Development

NATS ref: SG42302

Scottish Government ref: EN0110041

Issue 1

NATS Public

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Publication History

Issue	Month/Year	Change Requests and summary
1	October 2026	Scoping Request

Document Use

External use: Yes

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1. Background

1.1. En-route Consultation

NATS en-route plc is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of RADAR's, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and as such assesses the potential impact of every proposed development in the UK.

The technical assessment sections of this document define the assessments carried out against the development proposed in section 3.

2. Scope

This report provides NATS En-Route plc's view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS RADAR used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS' statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

3. Application Details

Scottish Government submitted a request for a NATS technical and operational assessment (TOPA) for the development at Chatteris Wind Farm. It will comprise turbines as detailed in Table 1 and contained within an area as shown in the diagrams contained in Appendix B.

Turbine	Lat	Long	East	North	Tip (m)
1	52.3828	0.0415	539047	278043	220
2	52.4224	0.0753	541218	282518	220
3	52.3940	0.0420	539043	279287	220
4	52.4122	0.0378	538699	281305	220
5	52.4033	0.0473	539375	280340	220
6	52.4109	0.0446	539171	281173	220
7	52.3963	0.0581	540134	279575	220
8	52.4009	0.0595	540214	280096	220
9	52.4149	0.0770	541359	281683	220
10	52.3909	0.0555	539971	278976	220
11	52.4185	0.0685	540770	282071	220
12	52.3950	0.0497	539565	279418	220
13	52.3882	0.0395	538889	278642	220
14	52.4000	0.0519	539701	279983	220
15	52.4026	0.0399	538875	280241	220

Table 1 – Turbine Details

4. Assessments Required

The proposed development falls within the assessment area of the following systems:

En-route Surv	Lat	Long	nm	km	Az (deg)	Type
Claxby Radar	53.4501	-0.3083	63.3	117.2	168.1	CMB
Clee Hill Radar	52.3983	-2.5975	96.8	179.3	88.8	CMB
Cromer Radar	52.9104	1.3496	55.0	101.9	237.7	CMB
Debden Radar	51.9902	0.2638	25.0	46.2	342.6	CMB
Heathrow Radar	51.4604	-0.4396	58.2	107.8	17.7	CMB
Bovingdon	51.7090	-0.5411	45.9	85.0	27.6	CMB
Pease Pottage	51.0834	-0.2143	78.6	145.6	7.1	CMB
Stansted Radar	51.8869	0.2301	30.6	56.7	348.1	CMB
En-route Nav	**Lat**	**Long**	**nm**	**km**	**Az (deg)**	**Type**
None						
En-route AGA	**Lat**	**Long**	**nm**	**km**	**Az (deg)**	**Type**
None						

Table 2 – Impacted Infrastructure

4.1. En-route RADAR Technical Assessment

4.1.1. Predicted Impact on Debden RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

4.1.2. En-route operational assessment of RADAR impact

Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

Unit or role	Comment
Swanwick Centre ATC	Unacceptable
Military ATC	Acceptable

Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected RADAR, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.

4.2. En-route Navigational Aid Assessment

4.2.1. Predicted Impact on Navigation Aids

No impact is anticipated on NATS' navigation aids.

4.3. En-route Radio Communication Assessment

4.3.1. Predicted Impact on the Radio Communications Infrastructure

No impact is anticipated on NATS' radio communications infrastructure.

5. Conclusions

5.1. En-route Consultation

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable.

Appendix A – Background RADAR Theory

Primary RADAR False Plots

When RADAR transmits a pulse of energy with a power of P_t the power density, P, at a range of r is given by the equation:

$$P = \frac{G_t P_t}{4\pi r^2}$$

Where G_t is the gain of the RADAR's antenna in the direction in question.

If an object at this point in space has a RADAR cross section of σ, this can be treated as if the object re-radiates the pulse with a gain of σ and therefore the power density of the reflected signal at the RADAR is given by the equation:

$$P_a = \frac{\sigma P}{4\pi r^2} = \frac{\sigma G_t P_t}{(4\pi)^2 r^4}$$

The RADAR's ability to collect this power and feed it to its receiver is a function of its antenna's effective area, A_e, and is given by the equation:

$$P_r = P_a A_e = \frac{P_a G_r \lambda^2}{4\pi} = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4}$$

Where G_t is the RADAR antenna's receive gain in the direction of the object and λ is the RADAR's wavelength.

In a real world environment this equation must be augmented to include losses due to a variety of factors both internal to the RADAR system as well as external losses due to terrain and atmospheric absorption.

For simplicity these losses are generally combined in a single variable L.

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4 L}$$

Secondary RADAR Reflections

When modelling the impact on SSR the probability that an indirect signal reflected from a wind turbine has the signal strength to be confused for a real interrogation or reply can determined from a similar equation:

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r_t^2 r_r^2 L}$$

Where r_t and r_r are the range from RADAR-to-turbine and turbine-to-aircraft respectively. This equation can be rearranged to give the radius from the turbine within which an aircraft must be for reflections to become a problem.

$$r_r = \sqrt{\frac{\lambda^2}{(4\pi)^3}} \sqrt{\frac{\sigma G_t G_r P_t}{r_t^2 P_r L}}$$

Shadowing

When turbines lie directly between a RADAR and an aircraft not only do they have the potential to absorb or deflect, enough power such that the signal is of insufficient level to be detected on arrival.

It is also possible that azimuth determination, whether this done via sliding window or monopulse, can be distorted giving rise to inaccurate position reporting.

Terrain and Propagation Modelling

All terrain and propagation modelling is carried out by a software tool called ICS Telecom (version 11.1.7). All calculations of propagation losses are carried out with ICS Telecom configured to use the ITU-R 526 propagation model.

Appendix B – Diagrams

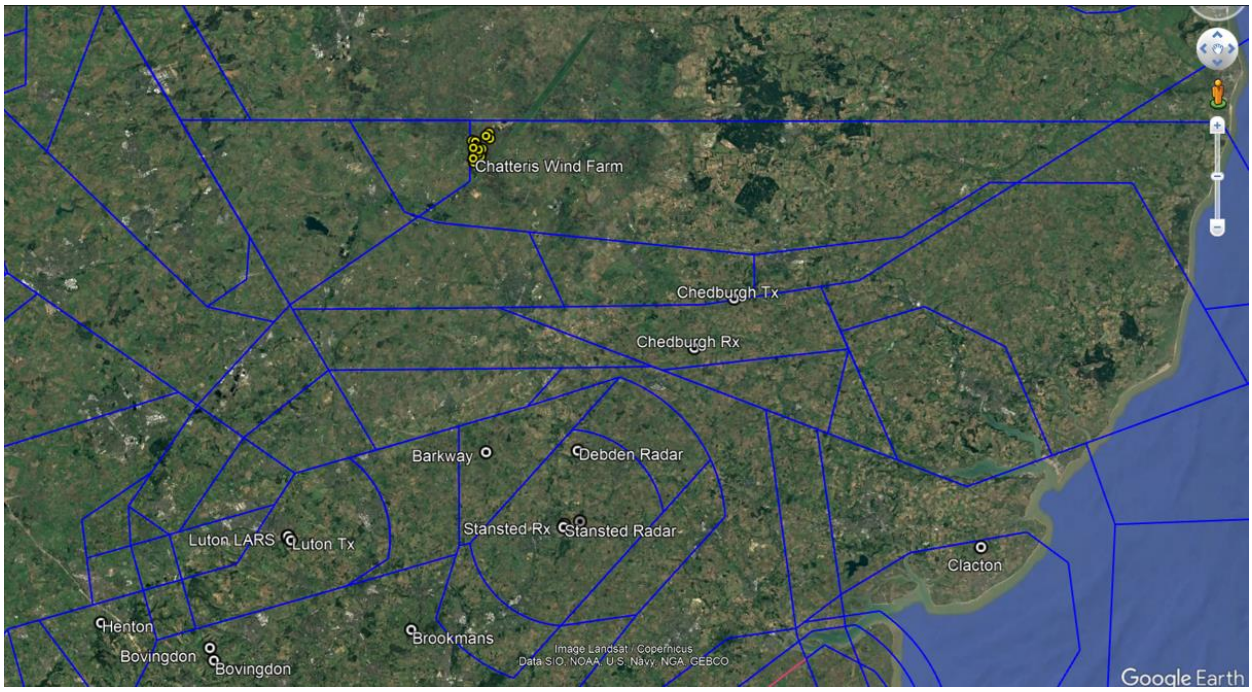

Figure 1: Proposed development location shown on an airways chart

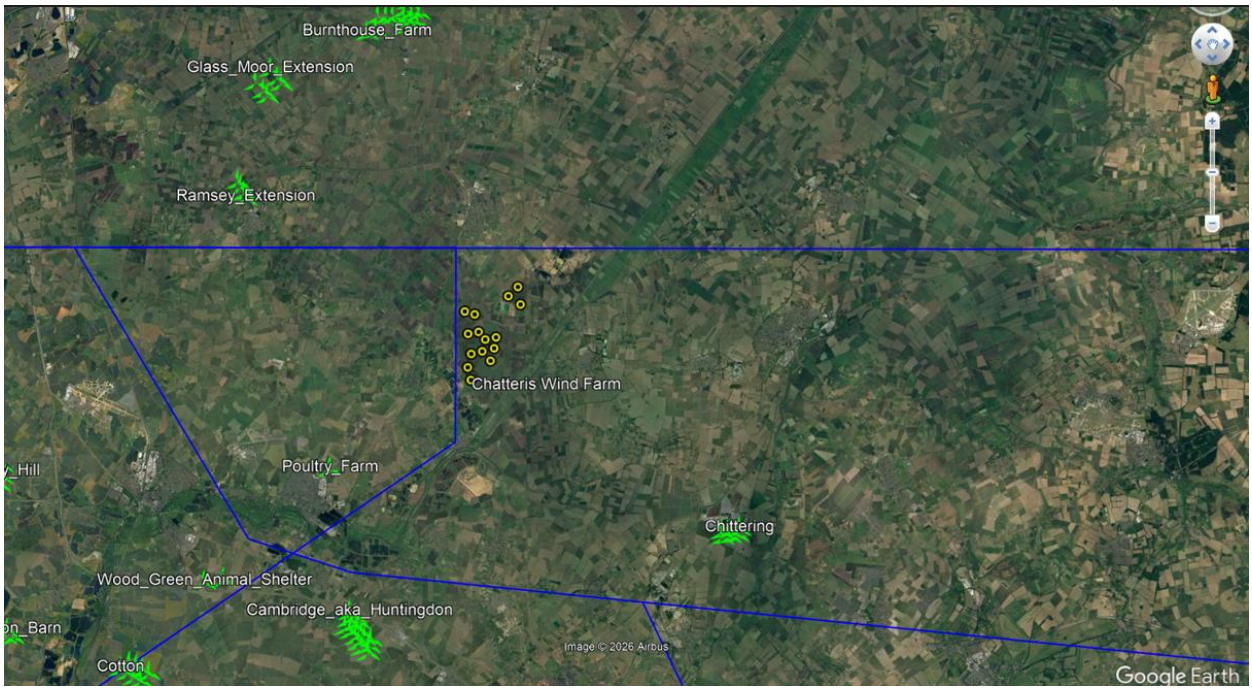

Figure 2: Proposed development shown alongside other recently assessed applications

consented/built
impact –accepted
impact –objection
mitigated
mitigation –proposed
no impact
refused/withdrawn

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 13 October 2026 14:52
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Subject: RE: EN0110041 Chatteris Wind Farm EIA Notification [SG42302]

You don't often get email from natssafeguarding@nats.co.uk. Learn why this is important

Our Ref: [redacted]

Dear Sir/Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA SG42302.

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. 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 obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries, please contact us using the details below.

Yours faithfully

NATS

NATS Safeguarding
E: natssafeguarding@nats.co.uk
4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Sent: 29 September 2026 13:16
Subject: EN0110041 Chatteris Wind Farm EIA Notification

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Date: 27 October 2026
Our ref: 560237
Your ref: EN0110041

Environmental Services Infrastructure Decisions & Applications Service
Planning Inspectorate
ChattersisWindFarm@planninginspectorate.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T [redacted]

Dear Sir/Madam,

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

Proposal: Proposed application by Vattenfall Wind Power Limited for an Order granting Development Consent for the Chatteris Wind Farm**.**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 29 September 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). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development but we would like to highlight the following to further clarify the recommended scope of the assessment.

Functionally Linked Land
The location of the site is likely to be within land functionally linked to the Ouse Washes Special Protection Area (SPA) and Ramsar site. We have provided significant bespoke advice in Annex A. Robust assessments will be required to be undertaken to determine whether adverse effects on these sites and their bird populations can be ruled out. Fundamentally, this is a proposal within a highly sensitive bird area and is situated extremely close to an internationally protected area for many at-risk species.

Detailed advice on scoping the Environmental Statement is available in the attached Annex A.

For any further advice on this consultation please contact consultations@naturalengland.org.uk.

Yours faithfully,

[redacted]
NSIP Senior Officer West Anglia

Annex A – Natural England's Advice on EIA Scoping

1 General principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (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 provided[1].
- 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

Overall, we would expect the ES to set out how the proposals have followed the 'avoid, mitigate, compensate' hierarchy as set out in the National Planning Policy Framework (NPPF) and the government's Overarching National Policy Statement for Energy (EN-1)[2]. Focus should be given to avoiding sensitive sites, with alternatives robustly considered. Natural England do not currently think this has been adhered to due to concerns over location of the site and scale of development.

[1] Nationally Significant Infrastructure Projects: Pre-Application Advice on Environmental Impact Assessment - GOV.UK
[2] Overarching National Policy Statement for Energy (EN-1) – December 2025

2 International and European designated nature conservation sites

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.

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.

The development site is within or may impact on the following European/internationally designated nature conservation site(s):

- Ouse Washes SPA
- Ouse Washes Ramsar
- Ouse Washes SAC

European site conservation objectives are available at http://publications.naturalengland.org.uk/category/6490068894089216.

SPAs are classified for rare and vulnerable birds. These sites are designated for mobile species that may also rely on areas outside of the site boundary. These supporting habitats may be used by SPA populations or some individuals of the population for nocturnal and diurnal foraging and roosting. These supporting habitats can play an essential role in maintaining SPA species populations. Such areas are considered to be 'functionally linked' to the SPA; proposals affecting functionally linked land may therefore have the potential to adversely affect the integrity of the European site.

Ornithological receptors and relevant species must include not just the breeding and wetland assemblages (Table 7.1, Scoping Report) but all individual qualifying species/features of interest for the Ouse Washes SPA & Ramsar. These have not been set out explicitly. Furthermore, the renewed desk study will clearly identify many species identified within, for example, the WeBS count data, which will also need to be included in all surveys and any analysis of the impacts of displacement, barrier effects, disturbance and collision etc.Table 1 provides further detail on the potential risks to these sites that should be assessed.

Table 1: Potential risk to international designated sites: the development may impact on the following sites	
Site name and link to conservation objective	**Potential impact pathways where further information/assessment is required**
Ouse Washes SPA (Designated Sites View) **Ouse Washes Ramsar (Designated Sites View)**	Natural England advises that the assessment of potential impacts to land functionally linked to Ouse Washes SPA and Ramsar should include: • Determination of areas functionally linked to the sites • Loss, deterioration and disturbance to habitat functionally linked to the sites – construction, operation and decommissioning • Indirect habitat loss through disturbance and/ or displacement (including disruption to flight lines resulting from avoidance action) – construction, operation and decommissioning • Mortality resulting from collisions with turbines or ancillary infrastructure – construction, operation and decommissioning • Potential barrier effect impacting access to important feeding and roosting areas – all phases • Any other potential impacts identified during the assessment. Further site-specific advice can also be found in Ouse Washes SPA Supplementary advice on conserving and restoring site features

2.1. Survey methodology

Guidance on assessing the impacts of windfarms on wild birds is available online at gov.uk. In addition, Natural England has the following additional advice on the survey programme:

2.2 Vantage Point surveys

- Three Vantage Point (VP) locations is insufficient in this case. The distribution across the area and turbine layout also need to be justified. VP! Viewshed includes only one potential turbine location. VP2 three, and VP3 includes twelve. Only one VP viewshed (VP1) covers any part of the SPA.
- Given the importance of the SPA and Ramsar interests nearby, the VP effort should be throughout the year and should exceed the minimum 72 hours per VP location per year divide between seasons.
- Directionally, there is no coverage of the area behind VP2 and VP1 looking towards the SPA/Ramser area and North East, and VP1 and VP2 are located close to each other, and could potentially impact bird behavious moving from the SPA to – or over – the PDS.Current guidance states "*care also needs to be taken not to locate observation points in locations that may lie directly between the site and a roost or nest site of a key target species, as this can seriously influence the behaviour of birds to be surveyed*".[3] The Scoping Report states that the VPs have been chosen to

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

include "*recording bird activity associated with key ornithological receptors, including the Ouse Washes SPA…".*

- Therefore, the advice regarding VP surveys is as follows:
    - Additional VP locations should be added to ensure that viewsheds looking North East and towards the SPA are included for the minimum of two years of survey effort;
    - VP locations VP1 and VP2 are close to each other – care must be taken to ensure the observer presence at any VP does not influence bird behaviour, e.g. by staggering dates in which VP1 and VP2 are used;
    - VP effort – if at 9 hours per month (7.4.4 Scoping Report), this should continue throughout the year (baseline 108 hours per year) but with consideration to additional hours in the breeding, non-breeding and migration/passage periods for all relevant species (periods and species to be determined through the revised desk study exercise). Hours should be spread across times of day and different weather and water table conditions and levels.
    - VP effort must include dusk and nocturnal monitoring using appropriate technology depending on the site, i.e. thermal imaging, night vision and acoustic recording. This monitoring must span breeding, non-breeding and migration/passage periods. Clear survey design with explanation will be necessary. This is critical given the swan, wader, waterbird and wildfowl SPA species.
    - VP survey effort should be complete for at least two years (i.e. a full 2 years for each VP location spread across all months, and at the same effort each year to enable proper comparison and understanding of inter-annual change). The effort each year should include that set out in (c) and (d) above.

2.1 Displacement

Natural England advises that 600m is a suitable precautionary displacement distance to use when assessing the impact of displacement of non-breeding birds from onshore wind turbines. Displacing birds on a continuing basis from areas used for all necessary stages of the non-breeding period equates to effective habitat loss, as such habitat is no longer available. Therefore, we advise that the surveys ensure that birds can be surveyed to a minimum of this distance from the site. This must also encompass access roads and other infrastructure as well as the turbine envelope.

2.2 Collision risk

When collision risk modelling is undertaken, two of the key elements are how the developers determine areal bird density and the proportion of birds flying at risk height. These calculations (with appropriate data) should be clearly set out and explained. Further, given the unequal number of proposed turbines within each VP area, a turbine-weighted bird density should also be calculated.

2.3 Non-breeding (wintering) surveys (August to March)

- 2 full years of surveys will be required covering the full 1km buffer around the PDS (at present, one year uses a 600m buffer and one year, a 1km buffer). Therefore, an additional full year with a 1km buffer will be needed.
- The surveys should cover a variety of times and water table variations to provide a decent representative dataset for the area.
- Walked transects should cover all areas to within 50m[4]. Maps of the transects will be required.
- It appears that the survey effort proposed for wintering waterfowl, geese and swans requires some additional effort, given the relevant SPA species and the potential sensitivity of the area and its surrounds:
    - Following the NatureScot guidance, feeding distribution surveys are likely required alongside roost surveys. Such surveys should be undertaken fortnightly as a minimum (or weekly if migratory only). Blind areas need to be physically checked. Droppings-searches should be conducted. All known roost sites within 1km should be surveyed fortnightly and, given that significant numbers of flights of whooper swan (286) and greylag goose (209) have already been observed, surveys of roost sites beyond 1km from the PDS may be necessary (and, if not undertaken, clear reasoning should be given). See the guidance set out below in Fig 3.
- Given the potential importance of nocturnal activity for waders, waterfowl, swans and geese, and the roosting sites nearby, nocturnal surveys should be undertaken fortnightly. The scoping work should include identification of all relevant functionally linked land with a full analysis covering definitions, data and information used, and the identification of such areas relevant to the PDS and its buffer zone.
- We advise that off-site grid connection should be considered as part of the overall package and Environmental Statement / Appropriate Assessment (as it could include overhead power lines). The turbine development is dependent on the grid connection (para 2.3.1 – 2.3.9 scoping report). These should not be separated from the turbine construction and operation in terms of assessment.

3 Nationally designated sites – Sites of Special Scientific Interest

The development site may impact on the following Sites of Special Scientific Interest (SSSI):

- Berry Fen SSSI

Sites of Special Scientific Interest 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 https://magic.defra.gov.uk/.

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

[4] See birdsurveyguidelines.org

Natural England Open Data Geoportal.

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. The consideration of significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

Berry Fen SSSI is a washland habitat of ornithological value, holding neutral grassland communities of a type now scarce in Britain. It is located close to the internationally important Ouse Washes and this factor influences the use of Berry Fen by overwintering wildfowl, especially when the Washes are too deeply flooded for them. In addition, most of the site floods irregularly during winter and wildfowl, other than Bewick's swan, may reach numbers of county significance.is a component part of Breckland SPA and is designated for Stone Curlew. Ouse Washes SSSI is a component part of Ouse Washes SPA and Ramsar but has additional designated features which are not interest features of the SPA / Ramsar. Potential impacts to these will require consideration, either as part of the HRA or as a separate assessment.

4 Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

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
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.

Natural England is aware that the proposed development is near other plans or projects which will need to be assessed in combination, particularly for impacts on designated sites, functionally linked land (FLL) and landscape-scale impacts on habitat severance. These include (but are not limited to) the Redmere Wind Farm, Fens Reservoir and Eaubrink Wind Farm. Results of surveys undertaken for other projects should be considered as far as

possible to understand whether there is a cumulative loss of FLL.

FLL is defined as land which is significantly used by SPA species (including qualifying features and assemblage species). It supports the functionality and integrity of the designated sites for these features. This land will contribute to the achievement of the SPAs' conservation objectives and is therefore protected in this context. This land supports the ecological network by providing alternative roosting and foraging sites.

We strongly encourage an overall coordinated and holistic assessment approach is adopted for the projects to minimise environmental impacts in this region, and would welcome discussions with the applicant on this.

5 Environmental data

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.

Detailed information on the natural environment is available at https://magic.defra.gov.uk/.

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.

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, the local Wildlife Trust, local geo-conservation group or other recording society.

The proposed site is located within 500m of Ouse Washes Special Protection Area (SPA). It is also likely to be located in land that used by species which are interest features of Ouse Washes SPA and Ramsar.

The desk study is not currently adequate to inform a robust assessment. It should be re-visited and must include detailed enquiry and assessment of:

- Local bird ringing groups, the British Trust for Ornithology, Royal Society for the Protection of Birds (RSPB), Wildlife Trusts, Wildfowl & Wetlands Trust (WWT) and any other conservation, ringing or tagging groups within 10km of the PDS boundary, and any data they hold on bird movements and survey records including, but not limited to, colour ringing projects, satellite tagging projects, data about movement and migration, feeding, roosting and loafing areas;
- A full peer-reviewed and grey literature search for all data, analyses and reports relating to the movement, migratory, roosting, feeding and nesting behaviour of all relevant bird species that may be relevant to the PDS and within at least a 10km boundary, with a particular emphasis on the SPA species;
- Detailed extraction and analysis of all relevant Wetland Bird Survey Data (WeBS) site data for the PDS and an appropriate buffer, which must include all WeBS data

covering core counts, roost counts and any relevant other counts. This is critical due to the importance of the roosting and feeding areas in and around the PDS. For example,

- Sutton North Fen Gravel Pit appears to sit within the PDS itself. This count area is an important site with high [max monthly counts] of Greylag geese (1,542), Lapwing (1,600), Whooper swan (1,244), Black-headed gull (347), Sand martin (120) and Starlin (100).
- Earith to Mepal (location 32356), which is just to the south of the PDS, has [max monthly counts] for Black-tailed godwit (1,984), Gadwall (296), Lapwing (976), Mallard (608), Shoveler (336) and Wigeon (5,620) in the last 4 years.
- Mepal Gravel Pits, which lies just outside the boundary of the PDS was an active count site until 2014/15.
- Colne Fen Gravel Pits (location 32203), which is just to the east of the PDS, has [max monthly counts] for Coot (247), Canada goose (162), Golden plover (200), Greylag goose (1,417), Lapwing (1,000), Pochard (125), Whooper swan (487), Linnet (300) and Reed bunting (81) in the last 4 years.
- Earith gravel pits (location 32269), which is just to the southeast of the PDS.

There are many other relevant WeBS count areas that cover both core counts, monthly counts and roost counts above and beyond those sampled above. They are all within a 2 – 5km buffer around the PDS and they all need to be analysed in terms of location avoidance, general risk to bird species, identifying appropriate survey areas and identifying correct ornithological receptors for impacts such as displacement and collision.

The Cambridgeshire Local Nature Recovery Strategy (LNRS) and identifying all areas for biodiversity improvement or of biodiversity importance in the area of and surrounding the PDS (10km for SPAs);

- The Ouse Washes Landscape Recovery project (RSPB), which is a 30-year habitat creation project in the Fens;
- The Wildfowl & Wetlands Trust (WWT) including, but not limited to, full data, information and research enquiries of the WWT covering movement, migration and relevant behaviours of all qualifying SPA species;
- The Goose & Swan Monitoring Programme (GSMP);
- Any post-construction collision and displacement monitoring for other wind farms within 20km of the PDS;
- Identification of all compensation and/or mitigation habitat relating to other developments in the area of the PDS and within the 5km buffer alongside identifying (a) the relevant agency and (b) the type and reason for the compensation;
- The numerous sources of information on The Ouse Washes and its increasing importance for birds, for example, but not limited to:
    - https://www.britishbirds.co.uk/journal/article/ouse-washes-and-its-increasing-importance-whooper-swans
    - All ringing studies and reports on the relevant movement and behaviours of Whooper and Bewick's Swans and any other SPA species (contact the WWT

in the first instance to obtain movement data and enquire about analysis to inform the surveys related to this development) https://www.wwt.org.uk/wetland-centres/welney/news/bewicks-swans-at-welney-winter-2023

- Contact Project Godwit for information on bird movement and ecology related to the Ouse Washes SPA https://projectgodwit.org.uk/wp-content/uploads/2023/12/BB-2022-AUG-ouse-washes.pdf

All results from, and analysis of, this extended desk study must be presented in any report and used to inform both the appropriateness of the PDS, the scoping exercise, the appropriate survey design, the relevant species for survey and any initial conclusions as to likely significant effects (LSE).

The mitigation hierarchy must be revisited after a more detailed desk study analysis with a clear and analytical focus on location and avoidance. This may prevent future expenditure on surveys and reports and enable the developers to select a site of significantly less ornithological sensitivity for this development.

Both the RSPB and the Wildfowl and Wetlands Trust (WWT) have reserves on the Ouse Washes so we would encourage the applicant to engage with them. They are likely to hold data on the use of land by species outside of the site boundaries, on and around the proposed development site. For instance, we are aware of this scientific paper on swan roost sites Using satellite tracking to assess the use of protected areas and alternative roosts by Whooper and Bewick's Swans - Wilson - 2025 - Ibis - Wiley Online Library. The Ouse Washes Landscape Recovery Scheme (Landscape Recovery: sharing the successful second round projects – Farming) should also inform the applicant's desk study.

6 General Principles

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).

Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines and an EcIA checklist have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

We refer the applicant to section 2.12 of the draft National Planning Statement for Renewable Energy Infrastructure (Defra, April 2025), which sets out the biodiversity, ecological, hydrological and environmental considerations for onshore wind proposals.

7 Regionally and Locally Important Sites

Natural England welcome the inclusion of Locally designated Sites identified in Table 6.2 and advise the Applicant contacts the local wildlife trusts, geoconservation groups or local

sites bodies in this area for further information and to ensure the list is comprehensive.

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. 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.

8 Protected species

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.

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.

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 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.

9 District Level Licensing for great crested newts

Natural England is not aware if the Applicant has considered applying to use the District Level Licencing scheme for great crested newts (GCN).

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.

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).

If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will 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 IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

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.

10 Priority Habitats and Species

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. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

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.

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.

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

11 Ancient Woodland, ancient and veteran trees

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.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Section N6 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.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory on Magic map sets out information on wood pasture and parkland.

The Ancient Tree Inventory - Woodland Trust provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

12 Biodiversity net gain (BNG)

From 2 November 2026, BNG will be mandatory for Nationally Significant Infrastructure Projects (NSIPs) in England. NSIP developers who apply for a development consent order (DCO) on or after this date need to deliver at least 10% net gain in biodiversity.

Natural England notes that the applicant has stated that the ES will include an Ecological Impact Assessment (EcIA) and that habitat condition assessments for BNG assessment will be undertaken (paragraph 6.1.2), and that there will be a BNG Strategy produced (Table 6.3).

BNG outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery

Strategies.

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 is poses for enhancement.

13 Landscape

13.1 Landscape and visual impacts

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

The 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.

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

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

13.2 Heritage landscapes

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 HM Revenue & Customs: Land, buildings and their contents - search.

14 Soils and agricultural land quality

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. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with the Overarching National Policy Statement for Energy (EN-1) and the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

The soil and peat information is currently presented in the Hydrology, Hydrogeology, Geology and Peat section; whilst the Agricultural Land Classification (ALC) data is currently in the Socio-Economics, Tourism, Recreation and Land Use Chapter. It is recommended that soils, including peat, and ALC are assessed in a single chapter.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils, including peat, 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.
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- 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.

A detailed ALC and soil survey of the land is required. This should normally be at a detailed level, e.g., one auger boring per hectare, 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 the suitable soil handling methods and appropriate reuse of the soil resource (e.g., agricultural reinstatement, habitat creation, landscaping, allotments and public open space), where required, as well as the EIA and micrositing.

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 Science Guidance Note Benefitting from Soil Management in Development and Construction.

14.1 EIA Scoping Report

14.1.1 Chapter 4 'Site Selection and Alternatives'

Whilst it is welcomed that soils, peat and agricultural land use are recognised as site selection considerations, and that the Proposed Development seeks to avoid or minimise impacts on BMV agricultural land (Paragraphs 4.2.2 and 4.3.1), there is insufficient information to demonstrate that these factors have been given appropriate weight within the site selection process. Based on the evidence presented, it appears that the entirety of the Order Limits comprises BMV agricultural land, raising questions as to how the stated objective of avoiding or minimising development on such land has been applied in practice.

Whilst Paragraph 4.5.2 indicates that "*The ES will describe the alternatives considered during the development of the Proposed Development and explain the rationale for the selected design*", it would be beneficial for the Scoping Report to provide greater transparency at this stage regarding how agricultural land and soil resources have influenced the evolution of the Proposed Development, the extent to which alternative options have been considered, and the justification for any proposed development on BMV land.

14.1.2 Chapter 11 Hydrology, Hydrogeology, Geology and Peat

Natural England welcome that initial site surveys, including peat depth surveys, have been undertaken (Para 11.1.3). Natural England would also request that detailed soil and Agricultural Land Classification (ALC) surveys are undertaken within the Order Limits. The soil survey will establish the soil properties across the Site to inform soil management during construction and operation, as well as inform the EIA and micro-siting. Furthermore, the ALC can be accurately determined across the Site to inform the EIA, micro-siting, as well as the restoration criteria.

Paragraphs 11.3.3 to 11.3.5 described the soils based on the SoilScapes broad descriptions. More detailed soil mapping is available and should be used to describe the likely soil properties at the site. These soil properties, extent and boundaries should then be confirmed through a detailed soil survey. This soil survey can be undertaken in conjunction with the ALC survey. This provides further reasoning to present the soils, peat and ALC information together in one chapter.

Natural England welcome that peat depths have been determined on a 100 m grid, with results suggesting only 2 probe depths of peat depths greater than 30 cm; and that further peat surveys are proposed within the footprints of the proposed infrastructure (Para 11.3.31). Natural England would also request that detailed soil/ALC surveys are undertaken within the Order Limits. The survey will establish the soil properties across the Site to robustly identify the extent and condition of the peat resource and the range of soil types present. This information could then inform site layout, including restoration or reinstatement criteria, demonstrating the sustainable re-use of the soil resource, in accordance with best practice guidance.

Furthermore, a detailed ALC survey is required to assess the land use implications of the development in line with National Policy Statements where a significant amount of agricultural land is likely to be affected.

This is particularly important given that it has been acknowledged in the chapter that "*As the Site has been extensively worked for agriculture it is possible that probing will not be able to penetrate this layer to ascertain peat depths and alternative methods may also be required in places*." (Paragraph 11.5.3), suggesting there is not much confidence in the peat depths presented.

Laboratory testing of the topsoil to establish the amount of soil organic matter would provide further evidence to differentiate between peat and soil.

Natural England welcome the scoping in of the potential significant effect "*Loss or disturbance of peat and carbon-rich soils through excavation, erosion or dewatering, including associated risks to peat stability*" (Para 11.4.1).

Natural England welcome that "An outline Peat Management Plan (OPMP) will be developed and submitted in support of the Application, presenting the estimated volumes of peat to be excavated, the methodologies for excavation and management, and the strategy for storage, reuse and restoration, in accordance with relevant guidance." (Para 11.4.2). This should be extended to include soil management (i.e. peat and soil management plan), informed through a detailed site-specific soil survey.

Whilst reference to Scottish peat handling best practice is welcomed, consideration should also be made to the Broad's Authority 2021 Guide to understanding and addressing the impact of new developments on peat soil.

Natural England welcome that monitoring will be used to "*confirm that peat reinstatement and restoration measures are successful or if additional measures are required*" (Table 11.2). Monitoring methodologies should be included in the ES.

14.1.3 Chapter 15 Socio-Economics, Tourism, Recreation and Land Use

Paragraph 15.3.10 describes the land within the Order Limits as "*Best and Most Versatile (BMV) agricultural land, comprising land within Grades 1, 2 and 3"*. It should be noted that BMV is defined as Grades 1, 2 and Subgrade 3a. The reference provided in Para 15.3.10 states 'predictive mapping', however the Provisional mapping is used in Figure 15.3. Please use the most up to date mapping, and ensure consistency throughout.

Paragraph 15.3.10 "*The Applicant will seek to undertake targeted ALC surveys within the Indicative Order Limits, subject to land access and other relevant constraints, to confirm the BMV status of the land*". It would be expected that a detailed ALC survey is undertaken across the full Order Limits, undertaken in line with current ALC Guidelines (2025) Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land - JP069.

Natural England welcomes the consideration of temporary and permanent agricultural land take, and potential soil disturbance (Table 15.1). These should be considered together with the potential impacts on peat as set out in Chapter 11.
Given the current mapping of BMV across the full order limits, the proposed mitigation to use design considerations to "*minimise the loss of, or access to, BMV agricultural land",* does not seem feasible.

14.1.4 EIA Scoping Report Appendix A Part 2. Figure 11.2 'National Soil Map' and 11.3 'Natural England Peaty Soils Location'

The soil mapping presented is high level soil mapping (SoilScapes). Since April 2026, the National Soil Map for England and Wales (NATMAP),
alongside a range of additional LandIS (Land Information System) datasets, are now openly accessible to all through a new public portal LandIS Portal.
The most detailed, available soil mapping should be used to identify the expected soil types across the Order Limits. For example, a 1:63,000 scale map (Sheet 135) for Cambridge and Ely as well as more detailed soil mapping such as the 1:25,000 Chatteris District map (Sheet TL38) extending across part of the site.

14.1.5 EIA Scoping Report Appendix A Part 3. Figure 15.3 'Provisional Agricultural Land Classification'.

The Provisional ALC map has been withdrawn and replaced by the new Predictive ALC Map for England.

A new strategic scale Predictive ALC map for England has been published which provides Nationwide coverage of ALC grades, including the distinguishment between Subgrades 3a and 3b.

The Predictive ALC Map for England is based on the principles of the recently updated 2025 Agricultural Land Classification of England and Wales Guidelines for grading the quality of agricultural land.
The map presented in Appendix 20 was drawn on the 18th September 2026, therefore it is expected that the most up to date mapping is used.

Detailed Post-1988 ALC data has not been identified, nor included in the desk-based baseline assessment in either Chapter 11 or 15. The information within the ALC reports can be used to inform the soil and ALC baseline.

Agricultural Land Classification detailed Post 1988 ALC survey, Sutton Gault, North Fen - ALCC02097
Agricultural Land Classification detailed Post 1988 ALC survey, Chatteris, Iretons Way - ALCC02791

15 Air quality

Natural England has produced Standard Advice for Air Quality Impacts in NSIPs, which can be found in Annex B. The standard advice is Natural England's formal statutory advice and

is a material consideration. 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 during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority.

16 Water quality

NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

The Ouse Washes SAC is in unfavourable condition due to, but not limited to, poor water quality and flooding. The Supplementary Advice for Conversation Objectives provides more details on site targets and requirements and should form the basis of any assessments made.

Section 11.2.1 states a 5km study area is being used – this is usually in relation to groundwater only. Impact pathways in relation to hydrology, especially water, should not be discounted by distance alone.

17 Climate change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

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

The Natural England and RSPB Climate Change Adaptation Manual (2020) provides

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

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

18 Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021. The Norfolk LNRS and Suffolk LNRS were both published in October 2025. The Cambridgeshire and Peterborough LNRS was published in December 2025. They identify strategic priorities for nature protection, recovery, and enhancement. Given the size and scale of the project, there are opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience.

19 Connecting people with nature

The ES should consider potential impacts on access land, common land and public rights of way in the vicinity of the development, in line with NPPF section TR8. 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.

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.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Annex B: 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. This standard advice may also be used for Hybrid Bills.

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 (NH_3)
- nitrogen oxides (NO, NO_2 or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO_2)

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/srcl 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.
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 **annual averages**. 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 alone irrespective of the background

			levels.
	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 **in-combination** 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.
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.	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.

		Note: If an AA has been undertaken of the proposals **alone** 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	

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 Monitoring[5] 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 NOx – using one of three sets of emission factors available). However, the User Guide to

[5] https://jncc.gov.uk/our-work/common-standards-monitoring

the EFT highlights that calculation tools only support assessment years up to a certain date (2040 in the current version), reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after this date 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 2040 are used for HRAs– which would mean percentages of EVs are at predicted 2040 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 (NH_3) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NOx in exhaust gases. Please note that the current EFT should be used and the noted date may change over time.

Motorways within the affected road network
Please note the following paragraph relates to NSIP proposals where air quality impacts are being considered as a result of increased traffic only. This approach is not appropriate for proposals that would alter the strategic 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: [redacted]
Sent: 13 October 2026 15:18
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Cc: [redacted]
Subject: Chatteris Wind Farm EIA

OFFICIAL

The EIA Scoping Report has been prepared by Chatteris
EN0110041 Chatteris Wind Farm EIA Notification

To whom it may confirm

I refer to your letter dated 29th September 2026 copy attached

NR do not offer a view on the scope of an EIA as this is for the Local Planning Authority to determine. However, NR will need to review the proposals to assess the impact on the railway infrastructure and assets. For example , NRs Signal and Sighting Engineers will need to review whether glint and glare will have any adverse impacts on the railway . This can originate from features located at considerably long distances from the railway

. NR's position is, therefore ,that Glint and Glare assessments should be carried out and so should not be scoped out of the EIA unless and until a site-specific analysis has been carried out with an NR signal and sighting engineer. It should also be noted that mitigation in relation to Glint and Glare should be confirmed to be maintained for the lifetime of the project (construction and operation).?

NR also wish to be included in further discussions with the applicant to explore the impacts of the proposed development on the railway in more detail and any appropriate mitigation within a Transport Assessment, which should consider the site's proximity to the operational railway and any railway assets such as overbridges and level crossings.

Please continue to consult us as this proposal develops via our planning inbox: "TownPlanningAnglia" <TownPlanningAnglia@networkrail.co.uk> copying [redacted]@networkrail.co.uk

Yours faithfully

[redacted]

[redacted]
4th Floor South,
1 Puddle Dock
London, EC4V 3DS
Surveyor, Property
M: [redacted]
E: [redacted]
W: www.networkrail.co.uk/property

****
****
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****
****

Norfolk County Council

Strategy and Transformation
County Hall
Martineau Lane
Norwich
NR1 2SG

Via Email

Date: 27th October 2026

Dear case officer,

EIA Scoping Opinion: Chatteris Wind Farm

Norfolk County Council (the County Council) welcomes the opportunity to comment on the EIA Scoping Report for Chatteris Wind Farm.

As the proposed development is located wholly within Cambridgeshire, the County Council defers to the relevant host authorities in respect of the detailed scope of the Environmental Impact Assessment. The County Council's principal interest relates to the potential cumulative effects of Chatteris Wind Farm with Redmere Wind Farm, which is being promoted concurrently by the same applicant and extends into Norfolk.

Cumulative effects

The County Council welcomes the identification of Redmere Wind Farm within the proposed cumulative effects assessment. Given the scale, proximity and concurrent development of the two proposals, there is considerable potential for cumulative effects. The County Council therefore expects the Environmental Statements for both projects to provide a robust and coordinated assessment of their combined effects, using consistent baseline information, assumptions, assessment methodologies and cumulative assessment cut-off dates where appropriate.

Particular attention should be given to cumulative landscape and visual effects across the wider Fenland landscape, including simultaneous, successive and sequential views and effects on landscape character. The County Council considers that the assessment should reflect the landscape as a whole rather than being constrained by administrative boundaries. Appropriate shared or complementary cumulative viewpoints should be agreed between the assessments for the two projects.

The County Council also considers that coordinated assessment will be important where the projects have the potential to affect common ecological or ornithological receptors, including bird populations, designated sites and flight routes, and where construction programmes or transport routes may overlap.

Highways and abnormal loads

The Scoping Report indicates that abnormal indivisible loads are currently anticipated to reach Chatteris from the Port of East Anglia (Great Yarmouth) via the A47 and A11 before travelling onwards towards the site. The County Council should therefore be consulted as the abnormal-load strategy is developed, including in relation to any works, traffic management measures or other effects upon the Norfolk highway network. The assessment should also consider cumulative effects where Chatteris and Redmere construction or abnormal-load traffic would use common sections of the highway network.

Aviation

Where Chatteris and Redmere have the potential to affect the same aviation, radar or airspace receptors, the County Council considers that the assessment of those receptors should have regard to the presence and effects of both developments.

Subject to the above, the County Council has no further comments on the proposed scope of the EIA at this stage. Please do not hesitate to get in touch if you have any questions about our submission.

Yours faithfully,

[redacted]
NSIP Team Leader
Norfolk County Council

North Northamptonshire Council

Development Management Service
Cedar Drive
Thrapston
NN14 4LZ
Tel: 0300 126 3000
www.northnorthants.gov.uk

Chatteris Wind Farm
ChatterisWindFarm@planninginspectorate.gov.uk

Please ask for	Direct Dial	Our Reference	Your Reference	Date
[redacted]	[redacted]	26/02807/COA	EN0110041	20.10.2026

Planning Services

Dear Sir/Madam

Proposal: Chatteris Wind Farm

Site Address: Land to the south of Chatteris, and west of Sutton and Mepal

The application site is located within the administrative area of East Cambridgeshire District Council, to the east of North Northamptonshire. North Northamptonshire Council has been consulted as part of the Environmental Impact Assessment process for the proposed wind farm development.

Having regard to the separation distance between the proposed development and the North Northamptonshire administrative area, North Northamptonshire Council has no comment to make in response to this consultation at this stage.

Yours faithfully,

[redacted]
Assistant Planning Officer

Telephone: [redacted]
Facsimile: [redacted]
E-mail: planningcontrol@peterborough.gov.uk
Case Officer: [redacted]
Our Ref: 26/002975/CONSUL
Your Ref:

PETERBOROUGH CITY COUNCIL

Planning Services
City Of Peterborough
Sand Martin House
Bittern Way
Fletton Quays
Peterborough
PE2 8TY
DX 12310 Peterborough 1
Telephone: 01733 747474

The Planning Inspectorate,
[redacted]
Planning Inspectorate
69, Buckingham Avenue
Slough
SL1 4PN

23-Oct-2026

Dear The Planning Inspectorate

Consultation
Development Consent for the Chatteris Wind Farm - Environmental Statement (ES) and the scoping process
Chatteris Wind Farm

Further to your enquiry received on 29-Sep-2026, in respect of the above, the Local Planning Authority makes the following comments:

1. Thank you for the opportunity to comment on the Scoping Request regarding the proposed 15 turbine 126MW proposal to the south of Chatteris.

   It is noted that the proposal site is approximately 25km from the Peterborough City Council (PCC) boundary. As such, consideration should be given by the relevant bodies as to whether the Nene Washes SSSI, SPA, SAC and Ramsar should be scoped in given its omission from the Scoping Report.

   It is also noted and agreed that potentially significant impacts in association with RAF Wittering, located at the western extent of the PCC local authority area are scoped in.

Yours faithfully

[redacted]
Head of Service - Planning
Place & Economy

South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge,
CB23 6EA
www.scambs.gov.uk

South Cambridgeshire District Council

PINS Reference: EN0110041
Contact (DCO Lead): [redacted]

27 October 2026

ChatterisWindFarm@planninginspectorate.gov.uk

Electronic submission only

Dear Sir / Madam

Application by Vattenfall Wind Power Ltd for an Order Granting Development Consent for the Chatteris Wind Farm (Ref: EN0110041): – EIA Scoping Report Response

Introduction

1. I am writing on behalf of South Cambridgeshire District Council in response to the EIA Scoping consultation request issued by the Planning Inspectorate (PINS) on the 29 September 2026 for the Chatteris Wind Farm Development Consent Order (DCO).
2. The Site lies between the villages of Mepal, Somersham and Sutton, south of Chatteris. The Indicative Order Limits extend across the administrative areas of East Cambridgeshire District Council, Fenland District Council and Cambridgeshire County Council.
3. South Cambridgeshire District Council (hereafter 'SCDC' or 'the Council') has been consulted by the Planning Inspectorate because the proposed development's Zone of Theoretical Visibility (ZTV) and Zone of Influence (ZOI) extend into, or lie in close proximity to, the South Cambridgeshire and may give rise to effects within the district.
4. SCDC does not fall within the definition of a local authority for the purposes of Sections 56 and 60 of the Planning Act 2008 (as amended). The Council is therefore responding to matters affecting those within the SCDC boundary only.
5. The Applicant, Vattenfall Wind Power Ltd (hereafter referred to as 'The Applicant'), has commissioned an Environmental Impact Assessment (EIA) Scoping Report, dated September 2026, in accordance with Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the 'EIA Regulations').

6. The Proposed Development would comprise up to 15 wind turbines with a maximum tip height of 220m, together with an on-site Battery Energy Storage System, on-site substation and associated infrastructure, including access tracks, landscaping, habitat management, biodiversity enhancement and amenity works. The Proposed Development would have a generation capacity of up to 126MW, and the BESS would have an installed capacity of 50MW.
7. The proposed development for the purpose of the DCO does not currently include any infrastructure associated with off-site cabling or a grid Connection.
8. Notwithstanding the above, the Council has reviewed the Environmental Impact Assessment Scoping Report and appendices and provide technical comments, as outlined in this letter.
9. This feedback is given without prejudice, and the Council reserves the right to make further additional comments on the DCO application, where required.

Principle of Development - Grid Connection

10. SCDC recognises the urgent national need for additional energy capacity and generally supports the principle of renewable and low-carbon energy generation.
11. However, SCDC shares the concerns raised by other local authorities regarding the absence of information on the proposed grid connection and associated transmission infrastructure.
12. Several NSIP-scale renewable energy projects in the region are proposing new transmission infrastructure and pylon corridors connecting to the network at Burwell. Potential cumulative and in-combination effects associated with these projects should therefore be identified and considered at the Scoping Stage, notwithstanding that some DCO applications have yet to be determined. Failure to assess these effects at an early stage risks creating significant evidence gaps within the Environmental Impact Assessment.
13. The decision to exclude grid connection infrastructure from the DCO application should be reconsidered. If it is to remain outside the Order limits, clear justification should be provided, together with sufficient information on the proposed connection strategy to demonstrate the scheme's deliverability and enable a proportionate assessment of its likely environmental effects. Given that operational viability of the scheme is inherently dependent on securing a grid connection, SCDC considers the potential impacts of this scheme should not be assessed in isolation.

Biodiversity and Nature Conservation, & Ornithology (EIA Scoping Ch. 6 & 7)

14. The Council's Ecology Officer supports and endorses the concerns raised by Cambridgeshire County Council, Fenland District Council, East Cambridgeshire Council and the RSPB regarding potential impacts on protected and priority habitats and species.

15. Direct ecological impacts within the Greater Cambridge area are likely to be primarily associated with the transportation of turbine components and ancillary construction equipment and the EIA should consider the ecological effects of these. Given the scale of the Proposed Development, abnormal load movements are likely to require highway modifications, temporary access arrangements and associated engineering works. The likely ecological effects of such works, including impacts on roadside habitats, hedgerows, field margins, protected species and priority species assemblages, should be identified and assessed.
16. Particular regard should be had to any works required along the transport route, including crossings of the A10 corridor, and to the provision of site access for abnormal loads. Such works may result in the temporary or permanent loss of habitats that support farmland birds and other species of ecological importance. Appropriate mitigation and, where necessary, compensation measures should be identified.
17. SCDC Ecology Officers therefore support the concerns raised by other consultees regarding the scope of ecological assessment required and consider that a comprehensive evaluation of direct, indirect, cumulative and transport-related ecological effects should be undertaken.

Landscape and Visual (ES Scoping Ch.9)

18. SCDC has reviewed Chapter 9 of the EIA Scoping Report and the proposed scope of assessment as it relates to Landscape and Visual Impacts and offers the following observations:

- The ZTV is based on a bare earth model and, in our view, is not well suited for the purposes of assessing likely visibility. Turbines of up to 220m to tip height have the potential to be visible from extensive distances. Ground-truthing of potential distant views will therefore be required.
- The assessment appropriately scopes in potential effects within 5km and 10km of the Proposed Development, together with consideration of longer-distance effects out to 30km including areas within South Cambridgeshire.
- Within the 5km to 10km buffer zone, lie the villages of Willingham, Over and Swavesey, and close proximity to the settlements of Northstowe and Cottenham. Viewpoints 8, 11 and 18 are the nearest to these settlements and located roughly at the district boundaries of South Cambridgeshire, East Cambridgeshire and Huntingdonshire.
- SCDC considers that Bridleway No. 178/24, which runs along the northern edge of Over and Willingham, should be included within the baseline visibility assessment and may represent an appropriate additional viewpoint location. Such a viewpoint would enable assessment of effects on residents of both villages, users of the bridleway and associated public rights of way network, and those using routes extending around the northern edge of the RSPB Ouse Fen Reserve.

- The City of Cambridge lies approximately within the 20km study area and significant adverse effects arising from turbine visibility are considered unlikely.

19. Other aspects of the scoped in material are generally agreed with, although there is an expectation that through iterative testing both additional viewpoints and removal of viewpoints may be expected.

20. Generally, we are satisfied with the scope and methodology presented in the scoping report. We have suggested additional scoping of visibility south of the RSPB Reserve to ensure residents and recreational users of routes in Over, Willingham and beyond are considered within the study.

Cumulative Effects

21. The Council expects the cumulative effects assessment to include strategic growth proposed across the Greater Cambridge area, including strategic allocations, planned new settlements and other major development proposals, and emerging growth sites in the Greater Cambridge Local Plan.

22. SCDC is engaged in a number of DCO projects at various stages of the consenting process. In addition, significant regional infrastructure projects, including East West Rail and the Fens Reservoir, have the potential to give rise to cumulative effects when considered alongside the Proposed Development. South Cambridgeshire is also delivering an ambitious programme of strategic and economic growth. Development sites within the district may fall within the relevant Zone of Influence (ZOI) for particular environmental topics and should therefore be included within the cumulative effects assessment.

23. Failure to consider such developments may result in an incomplete understanding of cumulative impacts, particularly in relation to landscape and visual character, transport networks, ecological resources and the combined effects of growth and infrastructure delivery across the region.

Other Environmental Topics

24. Other than landscape and visual effects, biodiversity impacts and cumulative effects, the Scoping Report identifies limited potential pathways for impacts within the administrative areas of South Cambridgeshire and Cambridge City. The principal pathway appears to relate to construction traffic and abnormal load movements on the strategic highway network. The applicant should confirm whether any part of the construction traffic route, abnormal load route or associated traffic management measures would affect receptors within South Cambridgeshire and, if so, these effects should be appropriately assessed within the Environmental Statement.

25. Based on the current information provided South Cambridgeshire District Council do not wish to make any comments or observations on the following EIA Scoping topics:

    - Cultural Heritage and Archaeology

- Shadow Flicker
- Hydrology, Hydrogeology, Geology and Peat
- Climate Change and Greenhouse Gases
- Traffic and Transport
- Noise and Vibration
- Socioeconomics, Tourism, Recreation and Land Use
- Aviation, Radar and Telecommunications
- Other Environmental Topics including Human Health, Air Quality, Major Accidents and Disasters, Forestry, Waste or Transboundary Effects

Conclusion

26. Notwithstanding the above, the Council has reviewed the Environmental Impact Assessment Scoping Report and provided technical comments as outlined in this letter. This feedback is given without prejudice, and the Council reserves the right to make further additional comments on the DCO application, where required.

Yours faithfully

[redacted] **MRTPI**

Principal Planning Officer, DCO Lead (NSIP/Major Infrastructure Delivery)
Greater Cambridge Shared Planning Service

From: Sphere Enquiries <enquiries@sphere-connections.co.uk>
Sent: 19 October 2026 16:59
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Subject: Re: EN0110041 Chatteris Wind Farm EIA Notification

[redacted]

Hi [redacted],

Thank you for taking the time to share these details with us.

I can confirm that Sphere Energy Connect has no assets in the vicinity of these works and have no comments to make at this time. We are a new IDNO business just entering the market.

Good luck with the project.

Thanks

[redacted]

[redacted] | Head of Asset Management & Operations | Sphere Energy Connect
E: [redacted]

Internal Use

Suffolk County Council

CHATTERIS ONSHORE WIND FARM

EN0110041

Scoping Consultation Response

Suffolk County Council

27 October 2026

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Glossary of Acronyms

AIL	*Abnormal Indivisible Load*
BESS	*Battery Energy Storage System*
DCO	*Development Consent Order*
EIA	*Environmental Impact Assessment*
ES	*Environmental Statement*
ESDAL	*Electronic Service Delivery for Abnormal Loads*
LHA	*Local Highway Authority*
MW	*Megawatt*
NH	*National Highways*
NSIP	*Nationally Significant Infrastructure Project*
STGO	*Special Types General Order*

"The Council" / "SCC" refers to Suffolk County Council.

Purpose of this Document

The document has been prepared by Suffolk County Council to respond to the Planning Inspectorate's Environmental Impact Assessment ("**EIA**") Scoping Consultation for Chatteris Onshore Wind Farm occurring between 29 September and 27 October 2026.

1 Introduction

1.1 The Proposed Development is a Nationally Significant Infrastructure Project ("**NSIP**"), as defined in the Planning Act 2008 (as amended), named Chatteris (Onshore) Wind Farm and promoted by Vattenfall Wind Power Ltd.

1.2 The Planning Inspectorate states that the Proposed Development is to build *"an onshore wind farm comprising of up to 15 wind turbines (of a height of 220m to blade tip), electrical infrastructure including an on-site substation, transformers, switchgear, buried cabling and a Battery Energy Storage System ("**BESS**"), together with site access and highway works, temporary construction infrastructure, and landscaping, habitat management and biodiversity enhancement. The proposed development is anticipated to have an installed generating capacity of approximately 126 MW. The grid connection will not form part of the DCO application."*

1.3 The Proposed Development does not directly impact any County Electoral Divisions in Suffolk.

1.4 Therefore, Suffolk County Council ("**SCC**") maintains an interest as a Neighbouring Authority for the Proposed Development. SCC responses may therefore include matters related to Economic Development and Tourism, the Local Highway Authorities ("**LHA**"), and Socio-economics and Skills.

1.5 SCC's position on the merits of the Proposed Development will be informed by Suffolk County Council's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy (2026) and its subsequent revisions.[1]

2 General Comments

2.1 SCC finds concern that the point of connection is not intended to be presented to form part of the Proposed Development when submitted. Although the Council does note that the Applicant has outlined that Burwell Main Substation has been identified as the grid connection location. The Council's position is that the generating station and point of connection are functionally interdependent and therefore should be considered as one project for the purposes of a robust examination of the Proposed Development. Whilst the Applicant's approach is acceptable in planning terms, communities and local authorities should be given the opportunity to scrutinise the impact of the totality of the Proposed Development during the extent of the NSIP process. Communities should be provided with certainty whether the point of connection will be offered as an

[1] https://www.suffolk.gov.uk/asset-library/scc-energy-water-commercial-transport-and-adaptive-infrastructure-policy-240226-final.pdf

overhead line or underground cabling system, and the route corridor options should further be presented.

2.2 With regard to Battery Energy Storage Systems, the Council understands that the Applicant proposes a capacity of up to 50 megawatts ("**MW**"). This is despite the generating capacity of the Proposed Development totalling approximately 126MW. In its experience, SCC has rarely seen NSIP development proposing co-located BESS with a lower capacity than its intended generating capacity and therefore has raised concerns with the Applicant regarding upscaling of assumptions in latter stages of the NSIP process. Further, the Applicant has yet to define its intended technology or cell chemistry. The Council awaits detail on these matters, including matters expected to be covered in the Battery Fire Safety Management Plan.

2.3 The Council would expect that any impacts of the Proposed Development should follow the Mitigation Hierarchy, as defined in the glossary of National Policy Statement EN-1,[2] as the process to first Avoid, then Reduce, then Mitigate, and then Compensate significant harm to the environment and biodiversity.

2.4 The Proposed Development must fully consider the cumulative impacts. This should include assessment of inter-project and intra-project cumulative effects. Should the point of connection be promoted as a separate, though interdependent, application then cumulative effects of the construction and operation of that element must be considered in the assessment. Further, SCC would recommend early engagement with emerging NSIPs in the locality, such as further onshore wind projects, in addition to the consideration of known proposed NSIPs such as Sunnica Energy Farm and Redmere Onshore Wind Farm (also promoted by the Promoter).

[2] https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1-2025/overarching-national-policy-statement-for-energy-en-1-2025-accessible-webpage

Impacts by Service Area

3 Local Highway Authority

3.1 Whilst SCC is not the Local Highway Authority directly affected by the Proposed Development; the Council would wish to make the following comments:

i. The scoping of the study should remain flexible so that as more detailed information is made available, for example the sources of aggregates, the assessments limits can then be expanded or contracted as appropriate.

ii. SCC would reserve the right to comment if the transport scope were to be extended into Suffolk.

iii. The cumulative impacts should include other regional NSIPs where it is likely that they will have an impact within the study area.

iv. In terms of further consideration SCC would defer to Cambridgeshire County Council and National Highways ("**NH**").

Abnormal Indivisible Loads

v. Reliance should not be placed solely on the Electronic Service Delivery for Abnormal Loads ("**ESDAL**") notification process with regards to Abnormal Indivisible Loads ("**AIL**") as this is a binary process, with movements either being accepted or rejected due to the restrictions placed on highway structures including Special Types General Orders ("**STGO**"). Early engagement with the LHAs is necessary to understand such restrictions to enable further assessment if necessary to review the capacity or in worse case to repair or replace substandard structures.

vi. The description in the scoping report (paragraph 2.1.4) and Figure 13.1a suggest that AILs will route from Great Yarmouth entering the site from the north via Littleport. It is not clear if National Highways, Norfolk County Council and Cambridgeshire County Council have confirmed this route is feasible. The alternative access from the south through Mildenhall with wide or long loads will be a challenge with the evolved, historic nature of the highway network.

vii. During the operational phase, it is the LHA's opinion that the movement of large loads to main site compounds or substations should be scoped into the assessment. This is to ensure long term resilience of routes used by large and heavy loads.

viii. The proposed AIL routing from Great Yarmouth port uses the A11 and A14 through Suffolk, both of which are owned and maintained by National Highways. Therefore, SCC would defer to NH regarding this route.

ix. However, if any abnormal loads use SCC maintained roads the authority would require structural assessments in addition to swept path analysis.

Relevant Highway Data

3.2 The highway boundary information can be obtained from the highway boundary team at HighwayRecords@suffolkhighways.org. Failure to do so has been found to leave gaps between the land controlled by the applicant and the highway boundary, challenging delivery of highway works.

3.3 When referenced, road numbers and street names should be those used in the national street gazetteer https://www.geoplace.co.uk/addresses-streets/street-data-and-services/national-street-gazetteer

3.4 Highway guidance on NSIPs for Suffolk can be found at https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters

3.5 The walking and cycling routes do not acknowledge the presence of quiet lanes that, while having no legal protection, do form an important part of the non-motorised network in the county. https://www.quietlanessuffolk.co.uk/

3.6 Suffolk also has a thriving network of Roadside Nature Reserves. Care needs to be taken to avoid and protect these during construction works, including avoiding damage by construction traffic using minor roads to access the site. Details can be found at https://www.suffolk.gov.uk/planning-waste-and-environment/suffolks-countryside-and-wildlife/landscape-and-wildlife/suffolks-roadside-nature-reserves-interactive-map

4 Socio-economics and Skills

4.1 SCC notes that the socio-economic assessment proposes a Local Study Area comprising East Cambridgeshire, Fenland and Huntingdonshire, with employment and economic effects considered at local and national scales. SCC does not consider that this approach adequately reflects the functional labour market and supply-chain geography associated with the delivery of Nationally Significant Infrastructure Projects. Whilst the Proposed Development is not located within Suffolk, the Environmental Statement ("**ES**") should demonstrate that the study areas selected for workforce, skills, education, employment and

supply-chain assessment reflect the geographical extent over which impacts may reasonably occur. In accordance with SCC's supplementary guidance on the socio-economic effects of NSIPs, SCC considers that a regional study area is likely to be required for these topics, given the increasingly interconnected labour market across the East of England and the potential for workforce and supply-chain interactions extending beyond the host authorities.

4.2 SCC considers that a regional approach is particularly important given the substantial pipeline of Nationally Significant Infrastructure Projects currently under construction, consented or proposed across Suffolk and the wider East of England. The ES should therefore assess cumulative workforce, skills and supply-chain effects arising from overlapping infrastructure programmes and demonstrate how the Proposed Development's labour and procurement requirements have been considered within this wider context. The assessment should identify workforce demand by occupation, skill level and project phase, estimate the likely geographical sources of labour, and assess the potential for labour market displacement, recruitment pressures, skills shortages and competition for specialist workers. Consideration should also be given to cumulative effects on regional supply chains, including demand for specialist contractors, professional services and construction-related businesses.

4.3 SCC notes that employment and economic effects during construction and decommissioning are proposed to be scoped into the assessment. However, whilst the Scoping Report identifies the potential for workforce-related effects during these phases, it does not identify any corresponding mitigation measures. SCC considers this to be a notable omission. Where potentially significant effects have not been excluded, the ES should clearly identify the measures proposed to avoid, reduce or manage adverse effects on labour markets, skills availability and supply chains, together with an explanation of how residual effects will be assessed. This should include a clear framework for workforce planning, engagement with local authorities, education and training providers, employers and skills bodies, and arrangements for monitoring and responding to workforce pressures throughout the construction and decommissioning periods.

4.4 The Scoping Report identifies a Skills and Employment Strategy as a potential project commitment. SCC supports the inclusion of such a measure but considers that the ES should provide further detail regarding its scope, objectives and implementation. In line with SCC's Socio-economic supplementary guidance[3], the assessment should consider workforce development and skills legacy opportunities associated with the Proposed Development, including apprenticeships, vocational training, engagement with further education

[3] https://www.suffolk.gov.uk/asset-library/nsip-socioeconomic-effectnsips.v6.pdf

providers and measures to support the development of skills required by the energy and infrastructure sectors. The ES should also assess whether existing education and training provision has sufficient capacity to support forecast workforce demand and identify any additional interventions required to address identified skills gaps.

4.5 SCC notes the intention to scope out wider operational socio-economic effects. Whilst recognising that operational workforce requirements are likely to be substantially lower than those associated with construction, SCC considers that the ES should provide robust evidence to justify the proposed scoping approach. This should include information on the anticipated operational workforce, relevant occupational requirements, labour sourcing assumptions and any ongoing skills or training requirements. Such information is necessary to demonstrate that potentially significant operational effects have been appropriately considered and can be reasonably excluded from detailed assessment.

4.6 Overall, SCC expects the ES to provide a robust and proportionate assessment of workforce, skills, education, employment and supply-chain effects, including cumulative effects with other major infrastructure projects across the region. The assessment should accord with the principles set out in SCC's Socio-economic supplementary guidance[3] and the socio-economic requirements of National Policy Statement EN-1[4], providing clear evidence on workforce requirements, labour market interactions, education and training capacity, supply-chain effects and mitigation measures. This will ensure that the likely effects of the Proposed Development on the wider regional workforce and skills landscape are fully understood and appropriately addressed.

[4] https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1-2025/overarching-national-policy-statement-for-energy-en-1-2025-accessible-webpage

Our Ref: NJO/350/PL/424
(Please quote this reference on any correspondence)

27 October 2026

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

ChatterisWindFarm@planninginspectorate.gov.uk

Dear Sir/Madam

Sutton and Mepal Internal Drainage Board ('the Board')

Your Ref EN0110041

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

Proposed application by Vattenfall Wind Power Limited (the applicant) for an Order granting Development Consent for the Chatteris 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

We are writing to you on behalf of the Sutton & Mepal Internal Drainage Board (IDB). Middle Level Commissioners (MLC) provide administrative and technical services for the Board. The proposed site falls with the Sutton & Mepal drainage district in the Middle Level of the Fens. Both the IDB and MLC are statutory bodies.

The land identified for this project forms a critical part of the network of artificial drainage serving the wider Board area. This is protected under specific legislation, and we strongly advise the Applicant to contact us at the earliest opportunity to engage with us and discuss these proposals.

Under normal circumstances, consent is required from the Board for any works affecting their drainage assets or operations under the Land Drainage Act 1991 and the Board's Byelaws. Because this application relates to a Nationally Significant Infrastructure Project, statutory consent under the Land Drainage Act and Board's Byelaws will need to be incorporated as protected provisions within any Development Consent Order.

It should be noted that ahead of any DCO being granted, separate consents under the Land Drainage Act and Board's Byelaws are likely to be required for any preliminary works including access provisions and site investigations. This includes temporary works. By entering into a pre-application agreement, we can work with the Applicant to ensure all their works are consented as required and remain compliant with our governing legislation.

IDBs have separate and specific statutory environmental duties and in order to discharge those duties, the IDB may require the Applicant to undertake and submit environmental assessments and mitigations that are over and above those required by other Authorities. We note that the environmental impact assessments that the Applicant has submitted relating to "in-combination effects" of other proposed and approved developments in the area do not include, for example, a 1000+ housing estate currently under construction in south Chatteris and the proposed Fens Reservoir (NSIP). The proposed windfarm could significantly impact the ariel connectivity of the designated Ouse Washes site for protected birds to the new Fens Reservoir and to the proposed, restored wetland habitats following the closure of nearby mineral extraction sites. In this regard, we would require the applicant to revise and re-submit an EIA Scoping Report along with a Habitats Regulations Assessment (HRA) for the project, with the full and proper consideration of the in-combination effects of numerous significant infrastructure developments in this environmentally sensitive area.

The Applicant has highlighted in section 4.3.1 of the EIA Scoping Report that site selection has been guided by the principles of national and local planning and environmental policy which includes: avoiding or minimising development on best and most versatile (BMV) agricultural land, comprising agricultural land classification (ALC) Grades 1, 2 and 3a, avoiding encroachment on nationally and internationally designated biodiversity and geodiversity sites and avoiding areas at high risk of flooding, where practicable. However, we note that the proposed development appears to be located entirely upon the highest classification of agricultural land as indicted in Figure 15.3, close to the internationally designated Ouse Washes and within Flood Zone 3, an area with the highest probability of flood.

The Ouse Washes is also a flood storage reservoir registered under the Reservoirs Act 1975. The Environment Agency is the undertaker for this reservoir, and the Applicant is advised to engage with them to understand any potential impacts or considerations.

A further consideration is the uncertain future of the Mepal Pumping Station, an aging asset that serves the district and is the only means of evacuating excess water to manage flood risk. The receiving system is Environment Agency main river, itself a designated site, and the impacts of these developments on these assets must also be properly assessed.

The Government's programme and opportunities for lowland peat re-wetting/restoration should also be taken into consideration.

We are disappointed that although the Board is a key stakeholder and consultee we have not yet been approached by the Applicant for early non-statutory engagement (ref paragraph 5.4.2 of the Scoping Report).

We strongly advise the Applicant to contact us as soon as possible and enter into a bespoke pre-application agreement with us as part of the DCO process to enable the proper consideration of the impact a project of this scale will have on the drainage district. More information about this can be found on our website Pre- & Post-Application Consultation/Detailed Consultation Processes – Middle Level.

More information can be found on the page for Developers and Planners on our website. We also draw your attention to the Standing Advice that applies across the Middle Level and associated Internal Drainage Boards Standing Advice – Middle Level

We strongly advise that the Applicant enters into a bespoke pre-application consultation agreement with us as soon as possible so that drainage, flood risk management and environmental issues impacting the Board's district can be dealt with at the earliest stage to inform the DCO.

Please be aware that we are a small organisation with limited capacity to deal with numerous large-scale developments and DCOs. We urge the applicant to engage with us as soon as possible so that we can manage workloads accordingly.

Yours faithfully

[redacted]

Chief Engineer

planningmatters@middlelevel.gov.uk

Middle Level Commissioners: Managing Water Enabling Life

cc:

[redacted]

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: EN0110041
Our Ref: CIRIS 96311

Ms [redacted]
Senior Environmental Adviser
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

26th October 2026

Dear [redacted]

Nationally Significant Infrastructure Project
Chatteris Wind Farm EN0110041
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 wish to make the following specific comments and recommendations:

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*', setting out aspects to be addressed within the Environmental Statement[1]. 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. Reducing public exposure to non-threshold pollutants below air quality standards will have potential public health benefits. Therefore, 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.

Battery Energy Storage System (BESS)

The proposed development will include a BESS and electrical infrastructure. The scoping report recognises the potential for fire or thermal runaway to occur, noting that hazards will be considered and mitigated within a Battery Safety Management Plan. However, given that the location of the BESS is not currently given in the documentation, an assessment of the potential impact of emissions from a fire or thermal event involving a BESS unit may be required to fully assess the risk to any residential or other sensitive receptors off-site.

Recommendation

We recommend that the applicant considers potential impacts from a fire incident involving the BESS, including potential public health risks from any plume and water run-off, having regard to National Fire Chief Council (NFCC) guidance.

[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

Electric and Magnetic Fields (EMF)

It is noted that the proposed development does not include any off-site export cable route or other off-site grid connection infrastructure beyond the order limits. However, according to Figure 9.11, there are some residential properties at, and even within, the border of the order limits. UKHSA thus requests that the promoter ensures that an appropriate assessment of the possible public health impact on receptors such as these is included in the ES.

Recommendation

We request that the ES includes consideration of the potential impact on receptors from sources of EMF. For information on carrying out an assessment, 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
More information is available in the referenced document produced by Public Health England, a UKHSA predecessor body[1].

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

From: [redacted]
Sent: 27 October 2026 14:55
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Subject: EN0110041 Chatteris Wind Farm

[redacted]

Dear [redacted]

West Suffolk Council will not be responding in detail to the scoping request consultation and will rely on the host authorities to submit comments.

Many thanks

[redacted]
Principal Planning Officer
Planning
Direct Dial: [redacted]
Email: [redacted]
www.westsuffolk.gov.uk
West Suffolk Council
#TeamWestSuffolk

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From: [redacted]
Sent: 21 October 2026 21:10
To: Chatteris Wind Farm <ChatterisWindFarm@planninginspectorate.gov.uk>
Subject: RE: EN0110041 Chatteris Wind Farm EIA Notification

[redacted]

Dear Sirs

Thank you for your email dated 29 September, 2026, inviting Witcham Parish Council to comment on proposals for the Scoping Opinion. This was considered at our meeting last week. The Council considers that the following must be included in your Scoping Opinion and thus included in the Environmental Statement accompanying a future application:

- Migrating birds and access to fens for feeding. The site is close to the Ouse Washes, designated a Special Protection Area (SPA) and Ramsar Site, a Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) to safeguard natural habitats and wild species, and supported by World Wildlife.
- Loss of prime agricultural land, fen/peat soils.
- Impact on the local Public Rights of Way network.

Yours sincerely

[redacted]

[redacted]
Clerk/RFO - Witcham Parish Council
[redacted]
All Parish Council correspondence must be addressed to the Parish Clerk - Email
Clerk@witchamparishcouncil.gov.uk

I work part time, usually 3-4 hours on a Monday or a Tuesday, so there may be a delay in my responding to both email and telephone calls.
All items for the agenda, including payments must be placed with the Clerk by the Monday of the week preceding the date of the meeting.

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