Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Redmere Wind Farm

Case Reference: EN0110042

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

10 November 2026

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APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

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1. INTRODUCTION

1.0.1 On 30 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 Redmere 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/EN0110042

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'

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

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
2.1.1	Table 2.1 and paragraphs 2.2.7 and 11.3.38	Temporary construction compounds	At this stage, no information is provided regarding the location of temporary construction compounds but it is noted that peat depth modelling will be used to optimise site layout and avoid areas of peat. The ES should provide further certainty on these matters by the point of application, to enable a robust assessment of effects to be undertaken. The ES should confirm what is meant by reinstatement to 'an appropriate condition'. This should be ensured through an appropriate commitment within the 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	Offsite highway works	The Scoping Report explains that known offsite third party land will be required to facilitate access for abnormal indivisible loads (AIL). These areas are shown on figures 2.1, 2.3b and 2.3c of the Scoping Report. No further information is provided in the Scoping Report regarding what might be required in order that the land parcels are able to be used by the proposed development. The ES should explain engineering works, vegetation removal, temporary access requirements, land reinstatement, third-party agreement or whether any additional land may be required to enable to access of AIL.

ID	Ref	Description	Inspectorate's comments
			The ES should provide further certainty on these matters by the point of application, to enable a robust assessment of effects to be undertaken. The applicant's attention is drawn to comments from South Cambridgeshire District Council (appendix 2 of this Opinion) in this regard.
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 techniques be relied upon to avoid or minimise impacts on sensitive receptors, the draft Development Consent Order (dDCO) should secure their use in relevant locations.
2.1.5	Paragraphs 2.2.6, 10.2.2, 11.3.37 and table 18.1	Micro-siting	The turbine micro-siting allowance around the turbines is inconsistent across the Scoping Report. Paragraphs 2.2.6, 10.2.2 and table 18.1 state it would be 100m, whereas paragraph 11.3.37 states it would be 50m. 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

ID	Ref	Description	Inspectorate's comments
			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 construction working hours. Any requirements for works outside these hours should be identified.
2.1.10	n/a	Water supply and disposal	The ES should confirm the anticipated water demand and water source(s) for construction and operational phases. It should demonstrate that the supply of water to the proposed development is deliverable and sustainable; the applicant's attention is drawn to the consultation response from Anglian Water (appendix 2 of this Opinion) in this regard which notes the region is classified by the Environment Agency as 'seriously water stressed'. 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	Paragraphs 2.2.6 and 10.2.2	Micro-siting	The Scoping Report identifies a micro-siting allowance of up to 100m for each turbine. The Inspectorate notes that this exceeds the typical 50m allowance noted in NatureScot *Good practice during wind farm construction* guidance. 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.
2.2.2	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, Historic England, Borough Council of Kings Lynn and West Norfolk, South Cambridgeshire District Council and Natural England) 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.
2.2.3	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.

ID	Ref	Description	Inspectorate's comments
2.2.4	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 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.
2.2.5	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.

ID	Ref	Description	Inspectorate's comments
			The above provisions should be agreed, where possible, with relevant stakeholders, and the ES should explain how they would be secured through the dDCO.
2.2.6	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	Throughout	Management plans	The Scoping Report identifies the preparation and implementation of several plans as mitigation, including:

ID	Ref	Description	Inspectorate's comments
			• bird protection plan • habitat management and monitoring plan • construction environmental management plan • construction traffic 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 • 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.
229	Paragraph 2.2.6	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. The ES should also define the term 'temporary' as paragraph 2.2.6 only explains timescales associated with short, medium and long term. The ES should explain the anticipated timescales associated with the duration of temporary impacts. EIA terminology should be aligned across all aspect chapters, while

ID	Ref	Description	Inspectorate's comments
			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.
2.2.10	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.
2.2.11	n/a	Hyperlinks	The ES should check that all hyperlinks, including those in Scoping Report Appendix B, are up to date at the point of submission. It is noted that certain hyperlinks in the Scoping Report do not work, for example - Guidance on Using an Updated Collision Risk Model to Assess Bird Collision Risk at Onshore Wind Farms (updated 16 April 2025).

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Biodiversity and Nature Conservation

(Scoping Report Section 6)

Table 3.1-a: The Inspectorate's comments on matters proposed to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Paragraph 6.3.4	Impacts on Shippea Hill SSSI	The Scoping Report seeks to scope out impacts on this site as it is a site designated for geological reasons and therefore there are no impact pathways. Shippea Hill SSSI is located within the Order Limits and is also designated for its records in peat. There is potential for impacts on this site as a result of changes to drainage, water levels and heat from cables which may have impacts on peat. On this basis, the Inspectorate does not agree to scope this SSSI out, and an assessment should be provided in the ES where significant effects are likely.
3.1.2	Table 6.3	Hazel dormouse and freshwater pearl mussel – construction and decommissioning	The Inspectorate is content that, based on their known local national distributions, these species are unlikely to be present in the application site; they 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.
3.1.3	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.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			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.

Table 3.1-b: The Inspectorate's comments on 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 6.3.12 and table 6.3	Invasive non-native species (INNS)	INNS have not been specifically scoped in, although the Scoping Report does identify that several records of INNS are reported in the study area and proposes that a survey will be undertaken. The ES should report on the survey findings, consider the potential for significant effects to result from their potential disturbance and identify relevant mitigation measures to manage their spread. The applicant's attention is drawn to comments from the Environment Agency (appendix 2 of this Opinion) in this regard.
3.1.6	Table 6.2 and figure 6.1	Non-statutory sites	Table 6.2 identifies eight County Wildlife Sites (CWS) within 2km of the Order Limits. However, only three of these CWS are shown on Figure 6.1. The ES should include a plan which shows the location of all local statutory and non-statutory designated sites within the 2km buffer.
3.1.7	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.

ID	Ref	Description	Inspectorate's comments
3.1.8	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. 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 within the dDCO.
3.1.9	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.
3.1.10	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 justification required as to why significant effects are not likely.
3.1.11	Table 6.3	Disturbance	The assessment of effects from disturbance should consider blasting for the borrow pits, where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
3.1.12	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 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.
3.1.13	Table 6.2 and paragraph 17.4.9	Ancient Woodland	Table 6.2 of the Scoping Report identifies Aspal Close Local Nature Reserve (LNR) as being located 5km from the proposed development and qualifies as an LNR due its grassland, Ancient Woodland and scrub. However, paragraph 17.4.9 states that the nearest area of Ancient Woodland is located approximately 12km north of the proposed development. The Inspectorate considers that all areas of Ancient Woodland should be identified in the ES and shown on supporting figures. An assessment should be undertaken where significant effects are likely.
3.1.14	Table 6.3 and paragraph 6.5.3	Impacts on roosting bats during construction	The Scoping Report scopes in the potential for significant effect on bats from construction activities but seeks to scope out potential impacts resulting from disturbance, damage or destruction of bat roosts in buildings or trees, on the basis that these elements will be retained. The Inspectorate considers that the design of the proposed development has not yet been finalised and it is premature to scope out the potential impacts at this stage. Furthermore, paragraph 6.5.3 states that tree loss will be avoided where reasonably practicable, so there may be trees lost on site. The Scoping Report does not provide details of buildings present on site.

ID	Ref	Description	Inspectorate's comments
			The Inspectorate considers that at this stage, there is potential for impacts on bat roosts in trees and buildings and this should be assessed in the ES where significant effects are likely.
3.1.15	Table 6.4	Bats – operation and maintenance	The Inspectorate notes that collision and barotrauma have been scoped in as there are likely significant effects on bats from these potential impact pathways. 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.
3.1.16	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.
3.1.17	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.
3.1.18	n/a	Indirect effects on prey species	The ES should 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 also 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.

ID	Ref	Description	Inspectorate's comments
3.1.19	n/a	Hydrological impacts	The ES should assess the implications of hydrological impacts on ecological receptors and hydrologically connected designated sites, where significant effects are likely.
3.1.20	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.
3.1.21	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)

ID	Ref	Description	Inspectorate's comments
3.1.22	n/a	White-clawed crayfish	The Scoping Report does not explain if white-clawed crayfish are present within the Order Limits or in watercourses with hydrological connectivity to the site. The ES should explain if white-clawed crayfish are present, and if so, include an assessment where significant effects are likely. Any necessary mitigation measures should be secured in the dDCO.

3.2 Ornithology

(Scoping Report Section 7)

Table 3.2-a: The Inspectorate's comments on matters proposed to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Table 7.2 and paragraph 7.3.14	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.
3.2.2	Table 7.3	Passerines and near passerines: collision, barrier, displacement, habitat and cumulative effects –	The Inspectorate is content this matter can be scoped out for the operational phase, 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.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		operation and maintenance	
3.2.3	Table 7.2 and paragraph 11.3.29	Boughton Fen SSSI, Breckland Rough SSSI, Breckland Forest SSSI, Ely Pits and Meadows SSSI, Foxhole Heath Eriswell SSSI, Hilgay Heronry SSSI, Lakenheath Warren SSSI, and Weeting Heath SSSI - construction	Table 7.2 seeks to scope out an assessment of the SSSI's listed opposite on the basis that they are located at a distance away from the site where there is an absence of credible impact pathways and functional connectivity. The closet of these SSSIs is Ely Pits and Meadows SSSI which is located 4.1km from the proposed development and is designated for its wetland and breeding bird species. The Inspectorate considers there may be potential for effect on qualifying bird species from this SSSI and considers that this should be assessed, or justification provided as to why significant effects are not likely. The Inspectorate notes that the following are component SSSIs which underpin the Breckland SPA: Breckland Rough SSSI, Breckland Forest SSSI, Foxhole Heath, Eriswell SSSI, Lakenheath Warren SSSI, and Weeting Heath SSSI. Of these, the Inspectorate considers that Breckland Farmland SSSI should be scoped in as this is located 530m from the Order limits. The Inspectorate agrees that significant effects are unlikely on the remaining SSSI's and therefore these may be scoped out of the ES. These sites are not specifically identified in table 7.3 in respect of the operational phase. For the avoidance of doubt, the Inspectorate considers that operational effects should also be assessed for Ely Pits and Meadows SSSI and Breckland Farmland SSSI.

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

ID	Ref	Description	Inspectorate's comments
3.2.4	Section 7.3	Data sources	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 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. See comments from Natural England in this regard (appendix 2 of this Opinion).
3.2.5	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.
3.2.6		Vantage Point Surveys	The Scoping Report states that the methodology applied for ornithological surveys is based on guidance by NatureScot. NatureScot guidance for onshore wind farms advises that vantage point surveys should cover the entire development area and where assessing potential collision risk, the breeding and wintering bird survey areas should extend at least 500m beyond the development boundary It is acknowledged that the scope of surveys is being discussed with Natural England and that the design of the proposed development has been subject to design changes. However, the coverage of VP surveys as presented on figure 7.2 does not cover the full extent of the current Order limits and the access corridor is not covered by a VP. The applicant's attention is drawn to the consultation responses from Natural England and East Cambridgeshire District Council (appendix 2 of this Opinion) in this regard.

ID	Ref	Description	Inspectorate's comments
			The applicant should seek to agree the number and location of VP surveys with relevant bodies in order that sufficient data is gathered to ensure a robust assessment. Where the methodology deviates from that set out in NatureScot, this should be explained and justified in the ES. The applicant's attention is also drawn to comments from Natural England (appendix 2 of this Opinion) regarding the need for two years of vantage point surveys in order to understand potential impacts from displacement and collision with turbines. Natural England has provided bespoke advice on the number and scope of vantage point surveys in appendix 2 of this Opinion. 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 number of VP surveys and seasons surveys are adequate.
3.2.7		Flight activity surveys	The timing of surveys should be detailed within the ES. The applicant should ensure that surveys reflect peak activity periods.
3.2.8		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.
3.2.9	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.

ID	Ref	Description	Inspectorate's comments
3.2.10	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.
3.2.11	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.
3.2.12	Figure 7.2	VP numbering	It is noted that the numbering of VP1 and VP2 are used on Figure 7.2 for both Redmere North and Redmere South, which could lead to confusion in the ES and subsequent examination. The Inspectorate suggests that the VP numbers are refined in the ES to avoid confusion between the survey outcomes for the north and south sites.
3.2.13	Paragraph 7.3.13	Breeding bird surveys for Breckland SPA qualifying features.	The Scoping Report explains that as Breckland SPA is located within 10km of the proposed development, surveys for stone curlew (a qualifying feature of Breckland SPA) were undertaken at Redmere North between April to August (year is not provided). No explanation is provided regarding specific surveys for nightjar and woodlark which are also qualifying features of the Breckland SPA. Tables 6.1 and 7.1 show that Breckland SPA is located 529m from the Order Limits. The ES should explain why specific surveys for these species have not been undertaken, given the proximity of the proposed development to the boundary of the SPA. Evidence of agreement of this with relevant bodies should be included, where possible.

ID	Ref	Description	Inspectorate's comments
3.2.14	Paragraph 7.3.18	Nocturnal surveys	The Scoping Report states that monthly nocturnal surveys "are also undertaken between August and February or March." No further information is provided in the Scoping Report or technical appendices regarding timings or location/s of the nocturnal surveys. It is noted that to date, the nocturnal surveys have recorded whooper swans, mallard and lapwing. The ES should provide information regarding the location and timings of nocturnal surveys. Full species counts should be included of all bird species observed during the nocturnal surveys.
3.2.15	Appendix C - paragraph 3.5.2	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.
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 has noted the creation of wetlands from the proposed Fens Reservoir 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 consideration of disturbance impacts. The applicant's attention is drawn to comments from Cambridgeshire County Council (appendix 2 of this Opinion) in this regard.
3.2.18	n/a	Indirect effects on prey species	See ID 3.1.18 above.
3.2.19	n/a	Sensitive environmental information	See ID 3.1.20 above.

3.3 Cultural heritage and archaeology

(Scoping Report Section 8)

Table 3.3-a: The Inspectorate's comments on matters proposed to be scoped 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, see ID 2.2.4 above.

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

ID	Ref	Description	Inspectorate's comments
3.3.2	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.
3.3.3	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.
3.3.4	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

ID	Ref	Description	Inspectorate's comments
3.3.5	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.
3.3.6	n/a	Groundwater levels	The ES should consider the potential impacts for the proposed development to affect groundwater levels and local preservation conditions. Damage to waterlogged archaeological remains should be assessed, where significant effects are likely. The applicant's attention is drawn to the consultation response from Historic England (appendix 2 of this Scoping Opinion) in this regard.
3.3.7	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.
3.3.8	n/a	Visualisations	The assessment should be supported by visualisations such as photomontages where possible 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 and viewpoint location of photomontages with relevant statutory bodies. Cross reference in the ES should be made to the LVIA assessment to avoid duplication. T
3.3.9	n/a	Consideration of the fenland landscape and associated geology	The ES should further consider the fen landscape and associated geology. The applicant's attention is drawn to the consultation responses from Cambridgeshire County Council, Suffolk County Council and Historic England in this regard (appendix 2 of this Scoping Opinion). The scoping report identifies desk-based assessment and walkover survey as the principal archaeological assessment methods but provides only limited very commitment to further evaluation. The ES should incorporate analysis of aerial photography and

ID	Ref	Description	Inspectorate's comments
			LiDAR data, and address the use of further evaluation strategies including geophysical surveys, geoarchaeological assessment and trial trench evaluation.

3.4 Landscape and Visual

(Scoping Report Section 9)

Table 3.4-a: The Inspectorate's comments on matters proposed to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Table 9.3	Impacts on non-host landscape character areas (LCAs) - temporary direct effects from construction activities	This matter is proposed to be scoped out of the assessment 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	Table 9.3 and paragraph 9.4.3	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 ES should explain the approach to ensure that potentially significant decommissioning phase effects are not overlooked.
3.4.3	Table 9.3	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

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		amenity - construction	Inspectorate is not in a position to scope this matter out. The ES should include an 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 9.3	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 9.4	Impacts to landscape character beyond the 10 km study area - operation	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.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.6	Table 9.4	Impacts to visual receptors beyond 30 km of the nearest proposed turbine - 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. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES. The applicant should make efforts to agree the list of potentially affected receptors beyond the study area with the relevant statutory bodies.

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

ID	Ref	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. The Inspectorate considers these study areas to be poorly justified for large structures in an open landscape. 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 – 912) show potential visibility beyond the proposed study areas. 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.
3.4.8	Paragraph 9.3.2	Viewpoints	The Inspectorate acknowledges that viewpoint locations will be refined. The applicant's attention is drawn to comments from the following consultation bodies (see appendix 2 of this Opinion): East Cambridgeshire District Council, Historic England, Isleham Parish

ID	Ref	Description	Inspectorate's comments
			Council, Mildenhall Parish Council, Norfolk County Council, Suffolk County Council, South Cambridgeshire District Council and Huntingdonshire District Council. The applicant should seek to agree representative viewpoints with relevant statutory 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 Norfolk County Council (appendix 2 of this opinion) for further information.
3.4.10	Appendix C, paragraph 5.5.3	Baseline	Paragraph 5.5.3 states that the cumulative assessment will include operational wind farms. The Inspectorate considers that any operational wind farms should be captured within the baseline environment, so far as is reasonably practicable.
3.4.11	Appendix C, paragraph 5.5.4	Cumulative effects	Paragraph 5.5.4 of appendix C 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 only 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 proposed to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 10.1	Shadow flicker: impacts on sensitive receptors, including residential properties, office buildings and tourist accommodation - 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.
3.5.2	Section 10.2	Impacts on receptors beyond 10 times the rotor diameter	The Scoping Report states that impacts on sensitive receptors beyond a distance equal to ten times the rotor diameter (plus 100m micro-siting allowance) from the turbine locations will not be assessed. It is stated that shadow flicker effects will not occur beyond this distance. This is based upon guidance in Department of Energy and Climate Change (DECC) Update of UK Shadow Flicker Evidence Base (2011)5 On this basis, the Inspectorate agrees that impacts beyond a distance equal to ten times the rotor diameter from the turbine locations may be scoped out of the ES.

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

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

3.6 Hydrology, hydrogeology , geology and peat

(Scoping Report Section 11)

Table 3.6-a: The Inspectorate's comments on proposed matters to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	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 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.
3.6.2	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.
3.6.3	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 historic brickworks within the Order Limits (see appendix 2 of this Opinion). The potential for the mobilisation of contaminants and risk of pollution to controlled waters should

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			be assessed within the ES, or further evidenced justification provided as to why such impacts are not likely.
3.6.4	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 comments on proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.6.5	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. 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.

ID	Ref	Description	Inspectorate's comments
3.6.6	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.
3.6.7	Table 11.1	Peat, peat soil and peatland - construction	The Inspectorate acknowledges that available mapping shows that peaty soils are present across the site and 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. The ES should consider the potential for all phases of the proposed development to change habitat presence and composition, for example, as a result of the dewatering of peat. 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.
3.6.8	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. Furthermore, the Inspectorate notes that the commitments register contains two entries for a CEMP (Hyd-02 and Hyd-06); it recommends that these are combined to avoid duplication and minimise the risk of inconsistencies.

ID	Ref	Description	Inspectorate's comments
3.6.9	Tables 11.1 and 11.2	Tidal flood risk	Tables 11.1 and 11.2 states that flood risk will be assessed, however does not confirm the scope of the assessment. The applicant is advised to agree the scope of the assessment with relevant statutory bodies.
3.6.10	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.
3.6.11	Table 11.2	Thermal impacts from buried high-voltage cables	The Scoping Report does not consider potential thermal impacts on groundwater receptors, including Groundwater Dependant Terrestrial Ecosystems (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.
3.6.12	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.
3.6.13	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.
3.6.14	n/a	Alternatives and the mitigation hierarchy	Consideration should be given to the use of peatland in relation to impacts of loss, deterioration and disturbance in the applicant's discussion of alternatives.

ID	Ref	Description	Inspectorate's comments
3.6.15	n/a	Trenchless crossing techniques	Paragraph 2.2.22 notes that watercourse crossings may be undertaken using trenchless techniques, for example horizontal directional drilling. The Inspectorate's comments at ID 3.1.17 above apply equally to hydrological, hydrogeological, geological and peat receptors.
3.6.16	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).
3.6.17	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 proposed to be scoped 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 level rise and sea temperature rise on the proposed development given the absence of marine components, and notes that any inland flood risk effects influenced by sea level rise

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		operation and maintenance	would be considered within the Flood Risk Assessment. On this basis, the Inspectorate is content to scope this matter out of further assessment.

Table 3.7-b: The Inspectorate's comments on 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	CCRA in other assessments	The Scoping Report states that some climate change matters, such as climate-related flood risks, would be addressed in other assessments as a result of applying best practice guidance. The Climate Change and GHG ES Chapter should signpost where each relevant ES aspect chapters has considered climate change, to ensure that there is no duplication or omission of assessment.
3.7.6	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. 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)

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 13.4.3 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	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 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 comments on proposed scope of assessment

ID	Ref	Description	Inspectorate's comments
3.8.5	Paragraph 13.2.3 and figure 3.1	Study area	Figure 13.1 shows the traffic route from port to site used as the study area for the assessment, although paragraph 13.2.3 states that this would be the route for abnormal indivisible load (AIL) deliveries. The ES should confirm the route and study area for non-AIL deliveries, as well as include potential routes on the local road network rather than just the strategic network. The road links considered to experience material changes in traffic flows should be identified on figures within the ES. The applicant's attention is drawn to the consultation response from South Cambridgeshire Council (appendix 2 of this Scoping Opinion).
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 Public Rights of Way (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.
3.8.8	n/a	Soil Affected Road network	The assessment should consider the suitability and resilience of affected transport routes and associated highway assets. This should include potential impacts on Soil Affected Roads, structures and other infrastructure, together with any monitoring, maintenance, protection or mitigation measures required to manage construction-related effects and ensure the continued operation of the highway network. The applicant's attention is drawn to the consultation response from Cambridgeshire County Council (appendix 2 of this Scoping Opinion) in this regard.

3.9 Noise and vibration

(Scoping Report Section 14)

Table 3.9-a: The Inspectorate's comments on matters proposed to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Table 14.3	Infrasound from wind turbines on residential receptors – 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	Low frequency noise on residential receptors 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	Amplitude modulation on residential receptors – 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 14.2	Ground-borne vibration on residential receptors from wind turbines - operation	The Scoping Report proposes to scope out ground-borne vibration from wind turbine operation on the basis that, ARWTN concludes that 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 14.2	Underground noise on residential receptors – 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 14.2	Traffic noise and vibration on residential receptors – 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 13.4.3 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 2.1.1 above.

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

ID	Ref	Description	Inspectorate's comments
3.9.7	Paragraph 14.3.7	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 example,

ID	Ref	Description	Inspectorate's comments
			to educational facilities, healthcare facilities, community facilities and recreational areas (including PRoWs). 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 potential 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.

3.10 Socio-economics, tourism, recreation and land use

(Scoping Report Section 15)

Table 3.10-a: The Inspectorate's comments on matters proposed to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 15.1 and Table 15.2	Effects to local and national labour markets – all phases	The Scoping Report states that direct, indirect and induced employment and GVA effects may be significant at the local level and will be assessed, but that such effects are unlikely to be significant at the national level. 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 15.1 and Table 15.2	Effects to local and national economies – all phases	The Scoping Report proposes to scope this matter out as the proposed development is expected to generate direct, indirect and induced Gross Value Added at all phases, however the applicant considers it to be unlikely for these to result in significant effects at a national level. The Inspectorate agrees that this matter can be scoped out.
3.10.3	Table 15.2	Effects on local businesses and economic sectors – operation	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.
3.10.4	Table 15.2	Effects on local communities during operation linked to the following:	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
		• changes in population • housing demand • demand for local services • community conditions	
3.10.5	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.
3.10.6	Table 15.2	Direct effects on users of PRoW, tourism and recreation assets, and social infrastructure - operation	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.
3.10.7	Table 15.2	Land use effects to agricultural land and farm holdings - operation	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, on the basis that long-term land-use effects arising from the establishment of the proposed development will be assessed within the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			construction assessment. However, the ES should clearly identify the duration of any such impacts arising during construction.

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

ID	Ref	Description	Inspectorate's comments
3.10.8	Section 15.2	Study area - socio-economic impacts such as employment generation, GVA and supply chain effects	The Scoping Report proposes a national study area, and a local study area encompassing the administrative areas of East Cambridgeshire District Council, West Suffolk Council and King's Lynn and West Norfolk Borough Council. 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. The applicant's attention is drawn to the comments from Suffolk County Council (see appendix 2 of this Opinion).
3.10.9	Paragraph 15.3.7	Agricultural Land Classification (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.
3.10.10	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.

ID	Ref	Description	Inspectorate's comments
			The ES should clarify whether agricultural use on BMV land will be able to continue during the operation and maintenance phase. Consideration should also be given to the use of BMV land in the applicant's discussion of alternatives.

3.11 Aviation, radar and telecommunications

(Scoping Report Section 16)

Table 3.11-a: The Inspectorate's comments on matters proposed to be scoped 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 that would be specific to the decommissioning phase, and the construction phase assessment would represent the worst-case scenario for aviation effects in this regard. The Inspectorate is therefore content that a separate decommissioning phase assessment is not required. However, see ID 2.2.4 above.
3.11.2	Tables 16.2 and 16.3	Local minor aerodromes – all phases	The Scoping Report seeks to scope this matter out and states that the proposed development lies outside the applicable consultation distances for local minor aerodromes. The Inspectorate agrees to scope this matter out; however, the ES should clearly identify the basis for consultation distances and evidence why these are relevant when considering the potential for significant effects. It should also evidence that there are no relevant airfields within these areas.
3.11.3	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. On this basis, the Inspectorate agrees that this matter can scoped out of the ES.

3.11.4	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. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.
3.11.5	Table 16.3	Aviation receptors: Cumulative effects - operation and maintenance	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 therefore be determined on a receptor-by-receptors basis. On this basis, the Inspectorate agrees that cumulative effects on aviation receptors can be scoped out of the ES.

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

ID	Ref	Description	Inspectorate's comments
3.11.6	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. 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)

Table 3.12-a: The Inspectorate's comments on matters proposed to be scoped out

ID	Ref	Applicant's proposed maters to scope out	Inspectorate's comments
3.12.1	Paragraphs 17.1.3-17.1.5 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 EM) – see ID 3.12.2 below), the Inspectorate acknowledges that relevant aspect chapters are proposed. 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 comments on proposed scope of assessment

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

3.13 Other environmental topics – air quality

(Scoping Report Section 17)

Table 3.13 a: The Inspectorate's comments on matters proposed to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Table 17.2	Impacts on local human health receptors from dust and particulate matter generated by earthworks, construction activities, vehicle movements and the handling or storage of materials - construction	The Scoping Report proposes to scope this matter out of the assessment on the basis that standard good-practice mitigation would be implemented via the Construction Environmental Management Plan (CEMP). The Inspectorate agrees that this matter can be scoped out for human receptors, on the basis that sufficient information is provided to demonstrate no likely significant effects and the site management controls, and mitigation are secured, to support this conclusion.
3.13.2	Table 17.2	Dust, particulate matter and vehicle emissions arising from the dismantling and removal of infrastructure - decommissioning	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 this approach should be explained in the ES.

Table 3.13 b: The Inspectorate's comments on proposed scope of assessment

ID	Ref	Description	Inspectorate's comments

3.13.3	Table 17.2	Local ecological receptors along traffic routes	Whilst traffic-related air quality effects on human receptors have been identified, it is unclear whether potential effects on ecological receptors, including nearby designated sites and sensitive habitats, have been considered. Clarification should be provided regarding whether ecological receptors have been considered for traffic related air quality impacts and the justification for their inclusion or exclusion from the assessment.
3.13.4	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)

Table 3.14 a: The Inspectorate's comments on matters proposed to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Paragraph 17.3.9	Standalone major accidents and disasters chapter.	The Scoping Report states that a separate major accidents and disasters chapter for the ES has been scoped out as risks relating principally to occupational or public health and safety would be proportionately addressed through embedded mitigation, detailed design, compliance with applicable health and safety legislation and established construction and operational controls. The Inspectorate agrees with this approach.
3.14.2	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.
3.14.3	Paragraph 17.3.7 and table 17.3	People and environmental receptors: battery fault resulting in fire or	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

		thermal runaway - operation	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.
3.14.4	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.
3.14.5	Table 17.3	Proposed development infrastructure and downstream environmental receptors: flooding - construction, operation	Table 17.3 concludes that there is no potential for significant impact and notes that flood risk will be considered in the Hydrology, Hydrogeology, Geology and Peat chapter of the ES. The Inspectorate notes that tables 11.1 and 11.2 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.

		and maintenance or decommissioning	
3.14.6	Table 17.3	People, habitats, soils and proposed development infrastructure: increased heat and dry conditions could contribute to wildfire or increase the likelihood and consequences of a fire – construction and operation	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.
3.14.7	Paragraph 17.3.5 and 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.
3.14.8	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.
3.14.9	Table 17.3	Workforce; nearby residents, workers and recreational users: general occupational or	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

		public safety incidents - construction, operation or decommissioning	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 comments on proposed scope of assessment

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

3.15 Other environmental topics - forestry

(Scoping Report Section 17)

Table 3.15 a: The Inspectorate's comments on matters proposed to be scoped out

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Table 17.4	Ancient woodland – all phases	The Scoping Report states that potential impacts on ancient woodland will be considered within the biodiversity and nature conservation chapter of the ES and not within the forestry chapter. The Inspectorate considers this approach is acceptable. See ID 3.1.13 above regarding ancient woodland.
3.15.2	Table 17.4	Impacts on forestry – operation	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	Impacts on forestry - decommissioning	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 comments on proposed scope of assessment

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

3.16 Other environmental topics - waste

(Scoping Report Section 17)

Table 3.16 a: The Inspectorate's comments on matters proposed to be scoped 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 comments on 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 proposed to be scoped 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 comments on 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 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 projects based on available information on all aspects of the ES. See ID 2.2.2 of this Opinion.
3.17.3	Section 18 and figure 18.1	Cumulative developments	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 which identify projects for inclusion within the cumulative effects assessment, including from: Anglian Water, East

			Cambridgeshire District Council, Natural England, South Cambridgeshire District Council, and Suffolk County Council (see appendix 2 of this Opinion).

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

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

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Beck Row, Holywell Row, and Kenny Hill Parish Council
	Brandon Town Council
	Little Downham parish council
	Elveden Parish Council
	City of Ely Parish Council
	Eriswell Parish Council
	Feltwell Parish Council
	Freckenham Parish Council
	Hilgay Parish Council
	Hockwold cum Wilton Parish Council
	Isleham Parish Council
	Lakenheath Parish Council
	Littleport Town Council
	Methwold Parish Council
	Mildenhall Town Council
	Soham Parish Council
	Southery Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Thetford Town Council
	Weeting Parish Council
	Welney Parish Council
	West Row Parish Council
	Witchford Parish Council
	Worlington Parish Council
	Bradwell Parish Council
	Burgh Castle Parish Council
	Caister-On-Sea Parish Council
	Freethorpe Parish Council
	Haddiscoe Parish Council
	Halvergate Parish Council
	Hopton-on-Sea Parish Council
	Mautby Parish Council
	Reedham Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	East & East Midlands Forestry Commission
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	Southery and District Internal Drainage Board
	Burnt Fen Internal Drainage Board
	Mildenhall Internal Drainage Board

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Middle Fen and Mere Internal Drainage Board
	Broads Internal Drainage Board
	Waveney Lower Yare and Lothingland Internal Drainage Board
	Padnal and Waterden Internal Drainage Board
	Lakenheath Internal Drainage Board
	Littleport and Downham Internal Drainage Board
	Cawdle Fen Internal Drainage Board
	Northwold Internal Drainage Board
	Stoke Ferry Internal Drainage Board
	Swaffam Internal Drainage Board
The Canal and River Trust	The Canal and River Trust
The relevant Highways Authority	East Cambridgeshire District Council
	Kings Lynn and West Norfolk Borough Council
	West Suffolk Council
	Great Yarmouth Borough Council
	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 Crown Estate Commissioners	The Crown Estate
The relevant police authority	Police and Crime Commissioner for Cambridgeshire and Peterborough
	Police and Crime Commissioner for Norfolk
	Police and Crime Commissioner for Suffolk
The relevant ambulance service	East of England Ambulance Service NHS Trust
The relevant fire and rescue authority	Norfolk Fire and Rescue Service
	Suffolk Fire and Rescue Service
	Cambridgeshire Fire and Rescue Service
The relevant Integrated Care Board	NHS Central East Integrated Care Board
	NHS Norfolk and Suffolk Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Cambridgeshire and Peterborough NHS Foundation Trust
	Norfolk and Suffolk NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
	Environment Agency

STATUTORY UNDERTAKER	ORGANISATION
Dock and Harbour authority	Great Yarmouth Port
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
	Northumbrian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	RWE Generation UK Public Limited Company
The relevant electricity distributor with CPO Powers	E.ON UK Network Assets Ltd
	Eastern Power Networks Plc
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Grid Line Power Networks
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Sphere Energy Connect Ltd
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)
	Getlink Projects 2 Ltd

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

LOCAL AUTHORITY
Babergh District Council
Bedford Borough Council
Braintree District Council
Breckland District Council
Cambridgeshire County Council
Central Bedfordshire Council
Peterborough City Council

LOCAL AUTHORITY
East Cambridgeshire District Council
Essex County Council
Fenland District Council
Hertfordshire County Council
Huntingdonshire District Council
Kings Lynn and West Norfolk Borough Council
Lincolnshire County Council
Mid Suffolk District Council
Norfolk County Council
North Norfolk District Council
North Northamptonshire Council
South Cambridgeshire District Council
South Holland District Council
Suffolk County Council
Broads Authority
West Suffolk Council
Broadland District Council
East Suffolk Council
Great Yarmouth Borough Council
South Norfolk District Council
Broads Authority

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
Babergh District Council and Mid Suffolk District Council
Borough Council of Kings Lynn and West Norfolk
Brandon Town Council
Broads Internal Drainage Board and Waveney, Yare and Lothingland Internal Drainage Board
Burnt Fen Internal Drainage Board
Cambridgeshire County Council
Canal and River Trust
Central Bedfordshire Council
City of Ely Parish Council
East Cambridgeshire District Council
East Suffolk Council
Environment Agency
Forestry Commission
Freckenham Parish Council
Great Yarmouth Parish Council
Historic England
Health and Safety Executive
Huntingdon District Council
Isleham Parish Council
Littleport Town Council
Mildenhall Town Council

Ministry of Defence
National Grid Electricity Transmission
National Highways
NATS Safeguarding
Natural England
NHS Central East Integrated Care Board
Norfolk Constabulary
Norfolk County Council
North Northamptonshire Council
South Cambridgeshire District Council
Southery and District Internal Drainage Board
Suffolk County Council
Suffolk Police
UK Health Security Agency
West Suffolk Council
Witchford 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: EN0110042

Our ref: Redmere Wind Farm/Scoping Response

FAO: Karen Wilkinson – Senior Environmental Advisor
By email: redmerewindfarm@planninginspectorate.gov.uk
[redacted]@vattenfall.com

28th October 2026

Dear Karen,

REDMERE WIND FARM – SCOPING CONSULTATION – ANGLIAN WATER RESPONSE

Thank you for the opportunity to comment on the scoping consultation for the Redmere 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 and the borough council of Kings Lynn and West Norfolk. 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 32 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 Chapter 18 of 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 and SPA Pipeline 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, 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 DCO application in Autumn 2028. Subject to consent being granted, works on site would commence in 2030 with water being brought into supply in 2036 at the earliest.

The proposed Redmere wind farm would, at the nearest point, be located approximately 13.6km metres from the Fens Reservoir's and a similar distance from the current boundary of part of its associated water infrastructure.

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 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 been reviewed and 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.

- Heritage

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

There may be opportunities for lessons learned as archaeological investigations and mitigation associated with the wind farm undertaken. These may provide useful information on archaeological survival, preservation conditions and mitigation approaches that could benefit the Fens Reservoir Project.

- Landscape and Visual Impacts

Both the Chatteris 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;
- Cumulative impacts upon impacts upon Public Rights of Way through temporary closures and diversions;
- 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.

Summary

In summary given the national and regional importance of the Fens Reservoir, Anglian Water would welcome early and continued engagement with Vattenfall Wind Power Limited 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.

SPA Pipeline

AWS is currently undertaking construction of a strategic pipeline project; this strategic pipeline includes an Interconnector between (1) Bexwell to Isleham which has been completed.

The Strategic Pipeline Alliance (SPA) is creating a new network of hundreds of kilometres of interconnecting pipelines and associated infrastructure to help to keep fresh, clean water flowing across our region for generations to come. This industry-leading initiative is the largest infrastructure programme Anglian Water has ever seen and is a vital element in our plans to meet future water demands and secure water supplies across our region.

The pipeline will stretch from North Lincolnshire to Essex and will allow water to be moved around the region from areas in the north to areas in the south where it is needed the most. The strategic pipeline will be 320km once complete and with the addition of the 260km of interconnectors in AMP8, it will be 580km in total. The interconnectors will take the pipelines even further into Cambridgeshire, Suffolk, and Norfolk to ensure the East of England remains resilient to drought for generations to come.

The Redmere Wind Farm project will need to take account of the SPA Pipeline between Bexwell and Isleham which will include crossings with the Redmere Wind Farm red line boundary.

The Bexwell to Isleham SPA pipeline dissects the proposed order limit. Given this, we would like to highlight the potential overlap between the Redmere Wind Farm Project and the SPA Pipeline project. We would encourage close co-ordination between the Applicant and AWS, to enable discussions around any potential interfaces between the projects, including how to manage construction, operational and impacts.

In summary, AWS are keen to engage with the applicant as it moves forward in order that the interactions between the projects construction and operation can be understood and managed through appropriate additional Protective Provisions or other legal Agreement, as may be relevant, such that there would be no impediment to the development and implementation of either project.

General Comments

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

A high-level review of the proposed order limits has identified the following interfaces with AWS assets.

- SPA Pipeline running North/ South dissecting the south parcel of the RLB
- Mains Pipe running along Redmere/ Cross Bank
- WTW Prickwillow – Lark Bank (on Lark Bank)
- WTW Shippea Hill Redmere

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 notes the site lies within the Cam and Ely Ouse Management Catchment and sub catchment of the Ely Ouse (South Level). There are a significant number of surface water receptors within the proposed order limits including field drainage channels as part of the Internal Drainage Board (IDB) maintained watercourses and ditches of Burnt Fen and Southery & District 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 field drainage channels Balwin's Lode, Lark Engine Drain, associated with the wider managed drainage network into the Little Ouse River, River Lark, and River Great Ouse (Chapter 11, Paragraph 11.3.22).

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; public water supply; 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 notes the presence of groundwater abstraction points and associated Source Protection Zones to the south of the northern parcel of the site. AWS welcomes the acknowledgement in the scoping report (table 11.1) that identifies the project may affect public water supply either by a change in volume or water quality due to construction and decommissioning activities. Anglian Water welcomes the proposal of further investigation and mitigation measures through drainage management, pollution-prevention measures, and implementation of Sustainable Drainage Systems (SuDS) to reduce 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, Operational and Decommissioning Environmental Management Plans 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]

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

Planning – Place Directorate

National Planning Casework Unit
5 St Philips Place
Colmore Row
Birmingham
B3 2PW

Please ask for : [redacted]
Direct line : [redacted]
Our reference : DC/26/04273
E-mail : planningyellow@baberghmidsuffolk.gov.uk

22nd October 2026

Dear Secretary of State,

EIA NOTIFICATION - APPLICATION FOR OTHER DISTRICTS DEVELOPMENT - DC/26/04273

Proposal: Scoping Consultation - Proposed application by Vattenfall Wind Power Limited (the applicant) for an Order granting Development Consent for the Redmere Wind Farm (the proposed NSIP development)

Location: Redmere Wind Farm, Land To The North And South Of Shippea Hill Railway Station, Shippea Hill, CB7 4SR

In accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, regulation 19 (3)(a) please find links to the ES and associated documents for the EIA applications listed below. This hyperlink will take you direct to our Public Access system.

https://planning.baberghmidsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=TM86Y6SH0A200

As per the regulations the Council must not determine the EIA application until the expiry of 30 days from the last date on which a copy of the statement was served in accordance with this regulation.

Please note that beyond the above date we cannot guarantee that your comments will be taken into account in the determination of this application. Should you wish to extend this deadline please call the Officer named above as soon as possible to establish whether the time period for your response can be extended.

Yours faithfully

Philip Isbell
Chief Planning Officer

Your ref: EN0110042
Our ref: 26/01534/NSIP
Email: Borough.Planning@west-norfolk.gov.uk

Borough Council of
King's Lynn &
West Norfolk

28 October 2026

Via Email: redmerewindfarm@planninginspectorate.gov.uk

RE: REQUEST FOR SCOPING OPINION - Proposed application by Vattenfall Wind Power Limited (the applicant) for an Order granting Development Consent for the Redmere Wind Farm

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Dear Karen Wilkinson,

Further to your Consultation on the above scoping request, the Borough Council of Kings Lynn and West Norfolk (hereafter referred to as "The Council") respond as follows.

Please note that these comments are made without prejudice and this response does not seek to discuss those matters that are within the purview of Norfolk County Council – for example, water/flood risk, archaeology, highway safety/traffic and transport, human health and waste and minerals. The Council will generally defer to the neighbouring district and county councils for the matters within or affecting land within their administrative boundaries.

This response relates solely to the methodologies and issues raised as part of the Scoping Report document and associated appendices and the Borough Council reserves the right to comment on the merits of the scheme at a later date. This response relates to matters of detail which would expect to see come forward as part of the Environmental Statement (ES).

Executive Summary

The Council considers that the key matters requiring detailed assessment are:

- Landscape and visual effects (including cumulative impacts and aviation lighting effects),
- Impacts upon heritage assets and their settings,
- Ecology, ornithological interests and impacts upon designated sites,
- Traffic and abnormal load routing,
- Residential amenity (including noise and shadow flicker),
- Cumulative impacts arising from the concentration of renewable energy and associated infrastructure projects within the wider area.

The Environmental Statement should adopt a precautionary approach and provide sufficient information to allow a full understanding of both individual and cumulative impacts on communities and the environment within the Borough.

KLWN Planning Policies

The Scoping Report, at paragraph 3.5.11 correctly sets out that Policy LP24 of the Local Plan specifically excludes wind energy development from consideration under Paragraph 2 of that policy. Whilst this is noted, the Council disagrees with the wording of Paragraphs 3.5.11-13. Various policies of Local Plan acknowledge and support development proposals which recognise and contribute to supporting Net Zero targets and there are various policies which whilst not relevant to the principle of wind energy, apply in regard to landscape impacts, amenity impacts, transport impacts or economic impacts etc.

Policy support for renewable energy is outlined within Policy LP06 'Climate Change' which supports development proposals which minimise or reduce carbon emissions or adapt and mitigate the impacts of change and by Policy LP18 'Design and Sustainable Development' which supports generation of cleaner energy where appropriate.

Grid Connection

The Council note the Scoping Report's comments on the DCO not including any off-site grid connection infrastructure. The Council are aware of other NSIP schemes which have relied upon the same and would reiterate the concerns over the uncertainty of the true nature and impacts of the scheme in the absence of this information.

The Council would like to see that this element of the Environmental Statement 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.

Location of Electrical Infrastructure

The Council note that the site is in Flood Zone 3. The ES should provide justification for the siting of electrical infrastructure within a high risk flood zone and explain how the risk of electrical failure due to flooding will be managed. The ES should confirm the locations of all electrical infrastructure, including the substation and BESS, with an explanation of how their location has been selected with consideration to these environmental constraints.

Piling

The ES should describe the location and methods applied for piling activities and explain any assumptions made in this regard. Any likely significant effects should be assessed using

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worst-case parameters and any proposed mitigation measures described. The maximum depth to which piling is required for any on site infrastructure should be stated and justified in the ES.

Agricultural Land

The ES should contain a clear understanding of the areas of land in each Best Most Versatile (BMV) classification that are 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. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.

The ES should also assess the impact to agricultural and other businesses. Where relevant, measures should be secured within the DCO to ensure farmers and other landowners' ability to access their land is not unnecessarily hindered.

Peat

The applicant is advised to consider the climate effects of disturbing or damaging peat soil. The emissions relating to disturbance of peat soil should be included in the GHG assessment if these areas are to be included within the works. The applicant's attention is drawn to comments from the EA at appendix 2 of this Opinion regarding the methodology used to characterise and assess peat soil.

Rochdale Envelope Approach

The Council note that the Applicant's appears to rely on a desire to incorporate flexibility into their draft DCO and apply a parameters-based or 'Rochdale Envelope' approach for this purpose, noting that the 'up to' 32 wind turbines are proposed at 'up to' 220m to tip.

The ES should provide the maximum parameters for all elements of the proposed development and ensure that the assessments in the ES are based upon these.

Alternatives

It is expected that the ES will set out an assessment of alternatives and clear reasoning as to why the preferred option has been chosen for each of the key elements of the proposal. The ES should set out the measures that have been taken and will be secured to ensure the development will deliver high standards of design and green infrastructure.

Cumulative Impacts

Section 18.2.2 refers to other existing, consented, under construction and reasonably foreseeable developments. The applicant will therefore need to carry out regular updates of the planning application searches and other publicly available information for emerging

schemes, especially other NSIPs or TCPA applications for large scale infrastructure, to consider for cumulative impacts during construction and operational phases.

The ES should clearly describe the relationship between the proposed development and connected projects, including any known NSIPs, Wind Farms, Solar Farms, Grid Infrastructure, BESS developments and Transmission Projects. This should include the extent to which the proposed development is dependent on the delivery of other projects or the extent to which cumulative impacts may be felt from other schemes in combination. The cumulative assessment should cover development timelines and anticipated consenting routes of the other projects, and an explanation of how these will be coordinated. A key concern is the cumulative transformation of the fen landscape and rural environment.

Landscape Character

The scoping report proposes a 10km landscape study area and a 30km visual study area. Given the openness of the fen landscape which is known for its wide skies and long-distance visibility characteristics, the Council expect that the ES justifies that these areas are sufficient. The LVIA must properly reflect the particular sensitivity of the landscape and the ability of turbines to be visible over very long distances. This must include intervisibility with other schemes.

The Council considers landscape and visual effects, including cumulative impacts and aviation lighting effects, to be a key issue. Particular regard should be had to the highly open character of the Fenland landscape and potential long-distance visibility of turbines beyond conventional study area assumptions and the impacts in both daylight and nighttime settings.

The ES should include a clear explanation of turbine height assumptions and worst-case parameters, and the following matters should be considered and addressed:

- Existing trees, hedgerows, shelterbelts, drainage ditches and characteristic field boundaries should be retained as much as possible, including during access and construction works.
- Opportunities to reduce landscape harm through careful siting and design should be explored from the outset.
- Appropriate landscaping should help integrate the lower-level infrastructure into its surroundings.
- Planting should reflect existing local patterns and retain characteristic open views, rather than introduce extensive screening belts or bunds that would create an uncharacteristic sense of enclosure.
- It should be recognised that planting will not screen the wider effects of turbines of this height.

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As the proposals develop, a landscape strategy should explain what will be retained, how impacts will be reduced, and how planting and other landscape features will be established and managed in the long term. The Council is 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.

Cultural Heritage

In the Fens, heritage setting often is inseparable from landscape assessment (discussed above). Given the scale of the development and the landscape setting, the ES should justify the use of a 10km Study Area in this regard, given the significance of the some of the heritage assets involved. The ES should include a robust assessment of effects beyond the study area where theoretically visible.

The Council defer to Norfolk County Council in regard to archaeological impacts.

Ecology

Ornithology and Designated Sites

The site lies close to internationally and nationally important bird habitats, including:

- Breckland SPA
- Breckland Farmland SSSI
- Stallode Wash, Lakenheath SSSI
- Potential links with Ouse Washes SPA/Ramsar

The Council's main concern with the information submitted is the ornithological survey requirements. The EIA Scoping Report reports preliminary survey finding for the ornithological field surveys currently being undertaken at Redmere. These surveys include:

- Flight activity surveys,
- Breeding raptor surveys.
- Breeding wader and wildfowl surveys
- Passage and winter bird surveys
- Nocturnal bird surveys
- Stone-curlew surveys

The report states that the coverage of the vantage points have been selected to provide cover of the proposed turbine areas and surrounding habitats and to capture bird activity with key ornithological receptors, including nearby designated sites. A key concern is the impact of the wind farm on avian features of the Brecks and Ouse Washes Habitats Sites.

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High numbers of whooper swan have already been reported across the preliminary survey results:

- Flight activity surveys recorded more than 2,500 flights at Redmere North
- Passage and winter bird surveys have recorded foraging flocks of whooper swan
- Monthly nocturnal surveys have recorded peak counts of approximately 1,600 whooper swans

Whooper swans are a Qualifying Feature of the Ouse Washes designated sites. Agricultural reservoirs are present within and adjacent to the site which could be a significant roosting resource for the whooper swans. The locations of the proposed turbines could cause various impacts to both resident and winter populations for the species moving between these roosts and feeding locations. The scale of the development means that this could be significant under the Habitats Regulations if significant numbers of whooper swans are impacted.

It is not clear from the information submitted that the reservoirs have been effectively captured within the survey methodology. Surveys must cover dawn, dusk and night-time activity surveys around these features and account for the variation in site use and movement patterns between winters. To survey effectively, thermal equipment must be utilised. Without such data capture it would not be possible to understand what the significance of such features are to whopper swans or how the proposals will impact the conservation status of the species.

Any impacts from the proposals would need to consider the effects of proposals which may act in combination i.e. Chatteris Windfarm, particularly where the proposals cause displacement, barrier effects and disruption to established commuting routes to features associated with the Ouse Washes.

<u>The Economy</u>

West Norfolk has a wealth of beautiful natural assets, such as the Fens, rural countryside, and coastal offer, which make our borough a fantastic place to live, learn, work, visit, and invest. With the key strategic objective of sustainably and proactively managing our natural resources, the West Norfolk Economic Strategy also highlights supporting businesses to become energy resilient, encouraging circular economy, decarbonisation and the generation / adoption of clean energy.

The Scoping Report focuses on positive economic outcomes. The Council would welcome greater clarity regarding:

- The scale of economic benefits likely to be generated locally and regionally, including potential adverse impacts on tourism, local businesses and agriculture.

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- How the proposal aligns with Norfolk's (regional) and West Norfolk's (local) ambitions for clean energy growth and managing natural resources.
- Opportunities for Norfolk and West Norfolk businesses to participate in the development.
- The extent to which the project could support local employment and skills development.

West Norfolk has historically faced challenges associated with lower wages, lower productivity and lower skills levels than many parts of the country. Understanding how the scheme could contribute towards raising skill levels and supporting access to higher paying jobs within the clean energy sector would help demonstrate its wider economic value to the borough.

To better understand the economic benefits arising from the proposal, the Council would welcome the preparation of a proportionate Economic Impact Assessment. Data and information to substantiate this should include:

- Construction phase employment.
- Operational employment.
- Earnings potential
- Gross Value Added (GVA) generated by the project
- Local and regional supply chain expenditure
- Wider economic impacts
- Expenditure spent and retained in Norfolk and West Norfolk

Such information would enable a more robust assessment of the extent to which the development contributes towards the local economic growth objectives and the ambitions set out in the West Norfolk Economic Strategy and the broader Norfolk Growth Plan.

Social Value Strategy

The Council would welcome commitments that deliver tangible and lasting benefits for West Norfolk residents, businesses and communities in the form of a Social Value Strategy. This should include measurable commitments relating to:

Local West Norfolk Economy

- Use of local suppliers and contractors.
- Support for local SMEs.
- Promotion of local procurement opportunities.

Skills and Employment opportunities

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- Apprenticeships and training opportunities.
- Work experience placements.
- Tackling NEETs and economic inactivity
- Engagement with schools, colleges and training providers.
- Support for local projects and organisations.
- Ongoing engagement with affected communities.

Environment

- Environmental improvements.
- Managing Natural Resources.

Measures that deliver long-term environmental benefits including biodiversity and ecosystems alongside renewable energy generation.

It is clear there are environmental benefits associated with the Redmere Wind Farm proposal, however, there is an opportunity for the applicant to provide greater detail on the economic, social and skills benefits arising from the proposal.

Traffic and Transport

Highway safety and the road network is within the purview of Norfolk County Council as Local Highway Authority, however the Council note that construction traffic has been scoped in as potentially significant. The Council expect the ES to cover the impacts of HGV traffic, construction vehicles and the residual impacts on local communities, including abnormal load routeing, bridge constraints and village impacts.

Residential Amenity

The Applicant has scoped in Turbine Noise, Shadow Flicker and Cumulative Noise impacts. The Councils requests:

- Identification of residential receptors
- Assessment using the latest applicable wind turbine standards
- A clear cumulative noise assessment
- Detailed shadow flicker modelling
- A robust complaint procedure

Particular attention should be given to aviation lighting impacts on residential amenity, as these can become a greater concern than daytime visibility.

Contaminated Land

The Council have reviewed the EIA Scoping Report. Section 11 covers Hydrology, Hydrogeology, Geology and Peat and Appendix B section 7 covers legislation, policy and guidance. The applicant should note that the Environment Agency's Land contamination risk management (LCRM) is the overarching guidance that it is expected to be followed to manage the risks from land contamination.

The Scoping Report indicates a low likelihood of significant pre-existing contamination, due to the predominantly agricultural nature of the site. However, the report indicates that:

- intrusive construction works are proposed;
- the site contains extensive peat deposits;
- sensitive groundwater and surface water receptors are present;
- Principal Aquifers occur beneath parts of the site; and
- any previously unidentified contamination could be mobilised during construction.

Therefore, Contaminated Land is scoped into the Environmental Statement, and further investigation will be required. The Environmental Statement and supporting reports should include a proportionate contaminated land assessment and risk assessment, in line with LCRM.

Air Quality

Air quality is covered as one of the other environmental topics in Chapter 17 along with related Traffic and Transport topic in Chapter 13 and Cumulative Effects in Chapter 18. Appendices cover the legal/policy/guidance context (Appendix B) and the approach to methodologies (Appendix C) used to assess impacts for the ES.

The updated NPPF has introduced important changes which the ES should recognise such as having regard to air quality targets for compliance purposes, including PM2.5, the concept of securing net environmental gains, such as reductions in air pollution and that development should be consistent with the objectives of this Council's Local Air Quality Strategy (LAQS). Air quality targets were already set out with EN-1 for compliance purposes.

The Council's LAQS is currently being developed, and it is expected to take a wider health-based viewpoint with one objective being to ensure development minimises pollution and that exposure is reduced. The LAQS will replace the Council's former Air Quality Action Plan (AQAP) as the last AQMA was revoked in April 2026.

Tables 13.1 (Traffic and Transport) and 17.2 (Air Quality) summarise the activities that are to be scoped in/out of the ES. The Council have the following comments:

Construction traffic (scoped in for air quality topic)

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The Council agree that this is scoped in and screened based on IAQM Planning for Air Quality (2017) guidance. To demonstrate the potential for significant effects, the Council request that the Appendix C methodology (Traffic and Transport) recognises this, such as mapping out road links by 24-hr AADT within the study area including details of any uncertainties with the distribution of traffic to help inform an affected road network (ARN) for the environmental topic(s). This should include inter-project and intra-project cumulative effects. Presenting this data in GIS shape format would help when assessing impacts at local sensitive receptors within the ai quality topic section.

Operational Traffic on Air Quality

The Council are content that operational traffic effects from the air quality topic are scoped out, on the basis that sufficient information will be provided to substantiate this when based on daily traffic movements (as 24-hr AADT).

Construction Dust

Construction dust is also proposed to be scoped out. Whilst this is agreed, adverse impacts should still be avoided wherever possible or else mitigated to an acceptable degree in accord with the NPPF. Appendix C provides the methodology to be used (based on the IAQM guidance on the Assessment of Dust from Demolition and Construction (2024)), which the Council would agree with as a proportionate approach. The construction dust assessment will then be used to identify appropriate mitigation measures incorporated within a CEMP.

Electrical Magnetic Fields

the BESS and grid connection infrastructure will be designed and installed in accordance with relevant statutory requirements and the ICNIRP guidelines for limiting public exposure to electromagnetic fields. Given the regulatory controls governing the design and operation of electrical infrastructure, together with the rapid attenuation of EMFs with distance, the Council agree that EMF is scoped out of the EIA as significant environmental effects associated with EMF are not anticipated.

Other matters requiring consideration

Anglian Water Pipeline – The Order Limits as proposed overlap the path of the Anglian Water Bexwell to Bury St Edmunds pipeline. It is assumed that any impacts on this key infrastructure will be considered as part of the submission.

DIO/MOD Impacts – The Order Limits are in close proximity to key RAF. RAF Feltwell, whilst not an operational flying base is linked to RAF Lakenheath and RAF Mildenhall. The MOD / DIO should be consulted and the impacts of the scheme on aviation and security set out and understood as part of the submission.

Borough Council of
King's Lynn &
West Norfolk

Yours sincerely,

[redacted]

Stuart Ashworth
Assistant Director – Environment and Planning

King's Court, Chapel Street, King's Lynn PE30 1EX
Customer Information Centre: (01553) 616200

BRANDON
TOWN COUNCIL

Chair: Cllr Gary Brocklehurst Town Clerk: Tina Cunnell

27th October 2026

Please find below Brandon Town Councils response to the proposed Redmere Wind Farm Development.

1.1.1 **Principle of the proposal**

While this council fully supports the UK's overarching transition to clean energy, we strongly object to the chosen location for a project of this unprecedented scale. Placing thirty-two 220-metre-tall wind turbines across the low, flat fenland landscape creates a disproportionate visual impact that dwarfs local heritage assets, specifically Ely Cathedral. Furthermore, the selection of this location represents an unacceptable loss of vital Grade 1 agricultural land and places heavy industrial energy infrastructure uncomfortably close to critical military aviation hubs at RAF Mildenhall, RAF Lakenheath and others, posing unmitigated national security and navigational risks

1.1.2 **Site selection and alternatives**

This council is not satisfied that Vattenfall has robustly or transparently evaluated alternative locations. The developer appears to have selected this specific fenland site primarily due to its proximity to grid connection points, failing to properly weight the severe cumulative impact on a region already oversaturated with major low carbon and renewable energy infrastructure, such as the Sunnica Solar Farm, Chatteris and Eaubrink wind farms, the Longmarsh Green Energy project, Keswick, High Grove, The Droves, East Pye and Tasway solar farms, the UK is already paying

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record amounts for shut down orders due to bottlenecks in the Grid, furthermore, the alternatives assessment fails to justify why brownfield land, less productive agricultural areas, or off-shore options were passed over in favour of destroying thousands of acres of Grade 1 agricultural land. The proposed site is within class G designated airspace and RAF Lakenheath and Mildenhall's Combined Military Aerodrome Traffic Zone, this allows fighter planes to travel by site and not Air Traffic Control. The project is also within LFA6 airspace which is a designated low fly zone for military aircraft such as the RAF Typhoon, F35, F22 and visiting international fighter aircraft. These planes travel at speeds of 450 knots at levels of 76 metres. The proposed site has the potential to effect radar and operations around 15 sites, including vital Air Defence Radar that is crucial for protecting the UK.

1.1.3 **Landscape and visual impact**

This council strongly objects to the catastrophic impact this development will have on the unique, low-lying, and highly open character of our constantly moving fenland landscape. At a monumental height of 220 metres, these 32 industrial structures will completely dominate the flat topography and destroy historic, uninterrupted big-sky views that define the region. The sheer vertical scale of the turbines will visually overwhelm nearby residential communities and deeply compromise the setting of key regional heritage assets, most notably the iconic silhouette of Ely Cathedral

4.1.4 Environmental impacts

This council holds grave concerns regarding the multifaceted environmental degradation this project represents. The development threatens to take thousands of acres of Grade 1 agricultural land out of active production, directly undermining domestic food security and jobs. Furthermore, the construction of heavy concrete foundations (likeley in excess of 2000 cubic metres per turbine) and quarry excavations for onsite aggregates,

poses an unmitigated risk to the delicate fenland hydrology and deep peat carbon sinks, threatening both massive carbon release and localised flood risk due to altered drainage dynamics.

Crucially, we object to the developer's minimisation of ecological proximity; while reports state that Brandon is 13km away, this is a mere 8 miles—well within the daily foraging range of protected bird species nesting in Thetford Forest and the Breckland Sites of Special Scientific Interest (SSSI) and Special Protection Area's (SPA). These populations routinely commute these short distances to feed on the rich fenland wetlands. Placing 220-metre structures directly inside this vital cross-regional flight path creates an unacceptable, high-risk collision hazard.

Impact on residents and community

This council strongly objects to the severe, long-term degradation of residential amenity and community health and wellbeing that this project will cause. The immense 220-metre scale of these turbines introduces a continuous threat of intrusive shadow flicker/strobe effect and low-frequency noise pollution, both of which are clinically proven to disrupt sleep patterns and negatively impact mental wellbeing in rural settings. Of the UK population 1 in 100 have epilepsy, in many cases epilepsy seizures can be activated by light flickers and strobing. The turbine operation will cause interference to radio, mobile and TV signals. Furthermore, during the multi-year construction phase, our communities will face relentless disruption from noise, dust, and vibration. It appears that some Turbines will be within 1500m of residential properties despite turbines of this size needing to be a minimum of 3000m away.

Traffic and construction impacts

This council holds severe concerns regarding local road safety, structural highway damage, and prolonged disruption throughout the multi-year construction window. While Vattenfall outlines a defined strategic construction route, it heavily relies on narrow, peat-subsided rural roads that are physically incapable of safely

absorbing standard traffic alongside gargantuan turbine components and heavy goods vehicles (HGVs).
Given that Brandon sits just 13km (8 miles) from the site, this council is highly concerned that drivers will inevitably exploit unsuited, unpoliced local cut-throughs to bypass construction bottlenecks. Without rigorous, physical policing by the developer, this will trigger traffic gridlock, compromise pedestrian safety in nearby villages, and accelerate the structural degradation of council-maintained roads.
Furthermore, this council highlights a major, critical vulnerability concerning construction material sourcing. Brandon hosts a significant aggregate supplier featuring two active railway sidings, processing thousands of tons of material weekly. Given its immediate geographic proximity and direct rail link to the site area via the Brandon-to-Shippea Hill line, it is highly probable that Vattenfall or their sub-contractors will utilise this facility as a primary source for the vast quantities of aggregate required for turbine foundations and access tracks.
While using rail-delivered aggregate reduces national freight movement, dispersing it from Brandon to the construction site will cause a catastrophic spike in local HGV traffic. This completely changes the disruption profile for our town. If HGVs are left unpoliced, they will saturate Brandon's roads, choke our narrow streets, and trigger gridlock.
The aggregate site in Brandon has an HGV restriction put in place by Norfolk County Council by way of a condition as part of the sidings planning permission, it restricts HGV movement through Brandon. The Planning Inspectorate wrote "Even though the A1065 has been designated as a zone distribution lorry route the road is relatively narrow and lined by a mixture of local shops and dwellings, as such large volumes of HGV traffic would cause disturbance to local residents' living conditions, particularly from fumes, dust, noise and vibration.
Brandon also has a rail crossing that suffers regular faults that lead to long tailbacks through the Town, Network Rail have confirmed that these are mostly caused by aggregate, falling from HGV's, that then cause sensor issues.

Tourism and local economy

This council is deeply concerned that the industrialisation of this iconic landscape will severely damage our thriving local visitor economy. The Brecks and the surrounding fenlands attract thousands of tourists annually for walking, cycling, and birdwatching, heavily supporting local hospitality, holiday lets, and independent businesses. Transforming this open landscape into a high-density industrial wind facility directly threatens the tranquil 'escape' value that draws visitors to the area. Furthermore, the disruption caused by years of heavy construction and traffic bottlenecks will actively deter tourists from visiting nearby towns like Brandon and Ely. The Independent Commission on the Future of Brandon was released in December 2025, its findings should be noted by the Planning Inspectorate, it states, for example, “a future prosperous Brandon will likely be one that leverages its location and natural environment. Central to ‘Brandon in the Brecks’ should be the wildlife and landscape of The Brecks and Thetford Forest, and symbiotic sectors like regenerative tourism and ecological research”. It clearly states people avoid the Town due to traffic. The Commission findings (all 134 pages) should be considered.

Consultation process

This council strongly condemns Vattenfall's consultation process as fundamentally flawed, exclusionary, and inadequate. Despite the developer's own reports explicitly highlighting Brandon's proximity to the site, our community has been entirely ignored. As the largest population centre in the immediate area outside of Ely and Littleport, it is a severe procedural failure that Vattenfall has failed to host a single local drop-in public exhibition, presentation, or council visit within Brandon. This oversight has effectively disenfranchised thousands of local residents who will bear the brunt of the construction traffic and environmental impacts. We formally recommend that the Planning Inspectorate halt progress on this application until Vattenfall is legally compelled to extend its consultation window. They must immediately deliver

dedicated, well-publicised public drop-in sessions within Brandon to allow our residents to properly scrutinise these plans

Preferred mitigation

We demand that Vattenfall publish a comprehensive, transparent site-selection matrix proving they thoroughly explored alternative locations that do not compromise national food security or critical military aviation corridors at RAF Mildenhall, RAF Lakenheath RAF Coningsby plus many other defence facilities that use this area and does not affect essential Air Defence Radar. We demand that Vattenfall conduct a comprehensive visual impact assessment from all major local public rights of way and residential boundaries, providing realistic, seasonal 3D wireframes that accurately illustrate the inescapable visual intrusion this project will impose on our rural communities and tourists through road and rail travel. We demand that a comprehensive, independent Environmental Impact Assessment (EIA) thoroughly map, foraging corridors before any further planning phases proceed. We demand that Vattenfall be legally mandated to conduct comprehensive, independent noise baseline monitoring at the closest residential boundaries and provide a legally binding Community Protection Agreement. This must include strict working hour limits, a clear, enforceable complaints procedure, and guaranteed compensation mechanisms for residents whose health and property enjoyment are directly compromised. We demand a legally binding Construction Traffic Management Plan (CTMP) that mandates automatic number-plate recognition (ANPR) monitoring to track HGV compliance, imposes strict physical width and weight restrictions on local lanes and Droves, limits delivery hours to avoid school runs, and establishes a substantial, developer-funded highway bond to fully cover the cost of repairing any sub-base road damage. Therefore, this council demands that the Construction Traffic Management Plan (CTMP) include an explicit, legally binding 'Haulage Routing Agreement' specifically for the Brandon aggregate hub. This

agreement must strictly define the exact, safest outbound route HGVs must take, entirely ban the use of any residential shortcuts or local cut-throughs, and mandate a developer-funded infrastructure levy to compensate Brandon for the severe wear and tear on our immediate road network, it should also keep strict records of tonnage taken from the sidings given the incoming aggregate quantities to the sidings are restricted by Norfolk County Council to a maximum of 189,696 tonnes per calendar year, this information should be made available to Brandon Town Council and Norfolk County Council. We demand that Vattenfall fund an independent Tourism Impact Assessment and establish a dedicated Local Business Indemnity Fund to directly compensate rural tourism and hospitality businesses for any verified loss of trade during the construction and operational phases.

Should the Secretary of State ultimately approve this application over local objections, this council demands the highest tier of legally binding mitigation to protect our community. First, we mandate that all electrical cabling connecting the turbines to the grid must be entirely undergrounded to prevent further visual and environmental degradation. Second, the developer must implement strict seasonal and temporal curtailment of construction traffic, entirely banning heavy goods vehicles (HGVs) from local roads during peak school-run hours and holiday tourism weekends. Third, we require a mandatory automatic acoustic and shadow-flicker shut-down system on any turbine found to breach strict residential noise limits. Finally, all construction compound lighting must be strictly downward-facing 'dark-sky' compliant to minimise light pollution across the fenland skyline

Community benefits

Given that Brandon represents the largest local population hub outside Ely and Littleport, our residents will absorb a disproportionate share of the traffic disruption, environmental damage, and economic strain. We therefore demand a dedicated,

long-term Community Benefit Fund legally ring-fenced specifically for Brandon and its immediate surrounding parishes. This fund must be used to directly subsidise household energy bills for local residents and finance crucial community infrastructure upgrades, including local road repairs, pedestrian safety measures, and environmental conservation projects in Thetford Forest and The Brecks. Furthermore, we demand that Vattenfall guarantee a Local Procurement and Apprenticeship Strategy, ensuring that regional businesses and young people from Brandon are given legal priority for construction contracts and operational jobs created by the project.
Brandon Town and other local Councils should be included in all negotiations.

Comments on proposed changes / mitigation
Please refer to our extensive mitigation demands detailed in Section 9 above

Additional local knowledge
This council wishes to highlight critical, site-specific constraints that Vattenfall's desk-based assessments overlook. First, the road network surrounding Brandon and the fen basin suffers from acute seasonal traffic spikes during spring and summer due to high tourism influxes to Thetford Forest, High Lodge, Center Parcs, Jockey Club and the Brecks, it is also the diversion route when the A11 is closed, when this happens Brandon has to endure long delays due to queueing traffic. Local flint buildings suffer from collapse due to vibration from heavy traffic. Introducing heavy construction haulage during these months will cripple local access. Second, the local rail network features critical level crossings (such as at Brandon and Shippea Hill) which already cause significant daily traffic tailbacks; regular movements of slow, oversized turbine components will cause severe gridlock at these bottlenecks. Finally, the area is prone to severe winter flooding and standing water when the local fen

drainage systems are overwhelmed. Heavy piling and construction footprint risk exacerbating these localised flood zones, threatening surrounding agricultural properties and farm land.

Recommendations / requests

Please refer to the specific evidence, traffic, and consultation demands detailed in Sections above.

Closing statement/ conclusion

In conclusion, Brandon Town Council formally registers its strong objection to the Redmere Wind Farm proposal in its current form due to the lack of local consultation, excessive physical scale, threats to protected Flora and Fauna, risk to defence operations & National Security and unmitigated highway risks. If this proposed windfarm were to go ahead in this airspace and as a result the USAF were to move to a better location in Europe, where they can fly safely, our local economy would be devastated and many jobs would be lost. However, as a proactive and community-focused authority, we remain entirely willing to engage constructively with both the developer and the Planning Inspectorate. We welcome direct, transparent dialogue to address these severe local impacts, evaluate comprehensive Environmental Impact Assessment findings, and ensure that our residents are properly protected and fairly compensated should this national infrastructure project proceed. It is our opinion that all items listed within Vattenfall's scoping document should be addressed thoroughly.

From: Redmere Wind Farm
To: [redacted]
Subject: Fw: EN0110042 Redmere Wind Farm Scoping consultation 26_37044_P
Date: 09 November 2026 12:49:11
Attachments: image002.png
image003.png
image004.png
image005.png
image006.png
image007.png

[redacted]

[redacted]

[redacted]

[redacted]

From: Planning Department <planning@wlma.org.uk>
Sent: 14 October 2026 12:01
To: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Cc: [redacted]@vattenfall.com [redacted]@vattenfall.com>; [redacted]@wlma.org.uk>
Subject: EN0110042 Redmere Wind Farm Scoping consultation 26_37044_P

> You don't often get email from planning@wlma.org.uk. Learn why this is important

Dear Redmere Wind Farm team,

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 Redmere 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 *Broads Internal Drainage Board* and *Waveney, Lower Yare and Lothingland Internal Drainage Board* on the information we consider should be provided in the Environmental Statement. I am responding from Water Management Alliance (WMA), on behalf of these two Boards, which are both Member Boards of WMA.

We have reviewed the outline project proposals and the Figures provided in the EIA Scoping Report Appendix A Part 1, and we note that no part of the indicative order limits lies within the districts of these two Internal Drainage Boards, nor within the districts of any of the other Member Boards of WMA. We therefore have no comments on the scope of the Environmental Statement.

However, we note the proposed wind farm areas lie within the districts of three Internal Drainage Boards that are not Member Boards of WMA: *Southery & District Internal Drainage Board, Burnt Fen Internal Drainage Board* and *Mildenhall Internal Drainage Board*. We therefore recommend that these IDBs be consulted.

Should the proposals change so that any works are proposed within the districts of WMA's Member Boards, we would wish to engage with the Applicant and the Planning Inspectorate to discuss

potential interactions with the Boards' interests, and IDB consenting requirements.

Kind regards,

Judith

Judith Stoutt BSc (Hons), MSc
National Infrastructure Officer
Water Management Alliance
dd: [redacted] | e: [redacted]@wlma.org.uk

Registered office: Pierpoint House, 28 Horsley's Fields, King's Lynn, Norfolk, PE30 5DD
t: 01553 819600 | e: info@wlma.org.uk | www.wlma.org.uk
What3Words: caring.employ.visit

WMA members: Broads Drainage Board, East Suffolk Water Management Board, King's Lynn Drainage Board, Norfolk Rivers Drainage Board, Pevensey and Cuckmere Water Level Management Board, South Holland Drainage Board, Waveney, Lower Yare and Lothingland Drainage Board and in association with Bluntisham IDB, Haddenham Level Drainage Commissioners, Hundred of Wisbech IDB, Over & Willingham IDB, Swavesey IDB, Upper Ouse Water Management Board and Waldersey IDB.

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Defenders of the Lowland Environment

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DPC:76616c646f72



BURNT FEN INTERNAL DRAINAGE BOARD

ENGINEER: ANDREW NEWTON
CLERK: TERESA REED

DRAINAGE OFFICE
MAIN STREET
PRICKWILLOW
CAMBS. CB7 4UN
TEL: ELY (01353) 688296

Sent by email

Our ref: AN/LM Your ref: EN0110042 8th October 2026

Dear Sirs

ENO0110042 – Redmere Wind Farm – EIA Scoping and Consultation and Regulation 11 Notification
Redmere South

The site is within the Burnt Fen Drainage District. I note that there are no references to Internal Drainage Boards, so the applicant will need to make themselves aware of our role.

The Board has Byelaws formed under the Land Drainage Act 1991, to protect the District and our access to our main drains. These byelaws are required for the following:

- Any works or structure in, over, under or within nine meters of a Board's Main Drain.
- Culverting of any watercourses within the Board's District.
- Any surface/foul water discharge into any watercourse within the Board's District. The Boards greenfield run off rate is 1.1 litres/sec/ha.

The following activities listed in the document may require the Board's consent:

- Temporary haul roads & construction area.
- Roadways & bridges.
- Hard standing area.
- Wind turbines.
- Fencing.
- Cable routes.
- CCTV Cables.
- Discharge of water into the Board's system.

The Board's consent will be required for each individual activity and is separate to the planning process.

I would urge the applicant to engage with the Board as soon as possible, so they are aware of our requirements.

Yours faithfully,

[redacted]

A Newton
Engineer

Cambridgeshire County Council

My ref: RWF.EIA.20261028
Your ref: **EN0110042**
Date: 28 October 2026
Contact: Alice Tithecott
Email: NSIPs@cambridgeshire.gov.uk

Graeme Kane, Executive Director
Place and Sustainability
Environment, Planning and Economy

Consents Team
PO Box 761
ALC2660
Huntingdon
Cambridgeshire
PE29 9QR

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

Dear Karen Wilkinson,

Environmental Impact Assessment (EIA) Scoping consultation by Vattenfall Wind Power Limited ("the Applicant") for Redmere Wind Farm EN0110042 Development Consent Order (DCO) proposals

I am writing on behalf of Cambridgeshire County Council (the Council) in response to your request dated 1 October 2026 regarding the Applicant's EIA Scoping Report for the Redmere 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]

Graeme Kane
Executive Director of Place and Sustainability

Our Reference: RWF.EIA.20261026

Redmere 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 EIA Scoping Report for the Redmere 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 systems (BESS) and electrical infrastructure under future heatwave and drought conditions. Likewise, it would be helpful to

Specialism	Comments
	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	The EIA Scoping Report provides detailed methodologies for the environmental topics proposed to be assessed. However, no methodology is provided for assessing Human Health as a standalone topic. The applicant has explicitly stated that Human Health will not be assessed separately, and no Human Health Assessment or Health Impact Assessment methodology is included. The Council considers that the proposed approach does not provide a clear framework for assessing cumulative health and wellbeing impacts, impacts on vulnerable groups, mental wellbeing, quality of life or health inequalities. The Council welcomes the extensive assessment proposed for noise, traffic, recreation, socioeconomics, landscape, shadow flicker and cumulative effects. However, given the scale of residential receptors, the importance of recreational assets, the potential effects on tranquillity and quality of life, and the large number of cumulative developments identified across the wider East Cambridgeshire area, the Council considers that assessment through separate technical chapters alone is insufficient. A Health Impact Assessment (HIA) or dedicated Human Health and Wellbeing Assessment chapter should be undertaken to assess cumulative impacts on health, wellbeing and health inequalities and to demonstrate how the health of East Cambridgeshire residents will be protected. 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 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. 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.

Specialism	Comments
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, King's Lynn and West Norfolk Borough Council, and West Suffolk District Council on this matter. The Council would defer to East Cambridgeshire District Council, King's Lynn and West Norfolk Borough Council, and West Suffolk 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 identifies potential benefits for local employment and the economy; however, it provides limited detail on how local communities will benefit through skills development, training, apprenticeships, and longer-term employment opportunities. It also gives relatively little attention to wider community benefits, social value, inclusion, impacts on local services, and potential effects on the rural economy. While these matters may be explored further as the project progresses, additional information on mitigation and enhancement measures would help demonstrate how the project can deliver lasting benefits beyond economic growth alone. In addition to wider stakeholder engagement, the Council recommends targeted engagement with directly affected residents, businesses, organisations, and local communities. Communities should be actively encouraged to express their views and help identify realistic mitigation measures for potential adverse effects. Engagement should be delivered through a range of accessible methods, including face-to-face, telephone, paper-based and digital approaches, to ensure meaningful participation from all groups and to maximise opportunities for those most affected to contribute to the development of the project. The project should also seek to maximise educational, skills and employment opportunities for local people. This could include commitments to local recruitment, training programmes and apprenticeships, alongside educational initiatives such as site visits and learning opportunities for schools, colleges, and community groups. Such initiatives would help increase understanding of renewable energy technologies, their environmental benefits, and associated career pathways. Active efforts should be made to draw upon local skills, services and supply chains wherever possible, creating economic opportunities within affected communities and helping to establish a positive and lasting local legacy.

Specialism	Comments
	The proposal refers to potential opportunities that could be explored through the project, including discussions around community benefit. It is important that these commitments are developed meaningfully and progressed at an early stage. Consideration should be given to the establishment of a community benefit fund, proportionate to the scale of the development and aligned with comparable projects elsewhere, alongside other measures that support local services, facilities and targeted community investment. Further detail on how community benefits will be identified, delivered and governed 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, King's Lynn and West Norfolk Borough Council, and West Suffolk District Council on this matter. The Council would defer to East Cambridgeshire District Council, King's Lynn and West Norfolk Borough Council, and West Suffolk 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 Site due to the potentially significant impact, cumulatively, that the scheme and the off-site 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 could potentially result in adverse effects to biodiversity. 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 cumulative impact of the

Specialism	Comments
	scheme on the national & international designations may have resulting 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 bird, particularly migratory birds. The methodology set out in Chapters 6 and 7 is considered insufficient to adequately capture impacts to bird species, including statutory sites designated for birds. The Proposed Development site has been identified as functionally linked land for the Ouse Washes Site of Special Scientific Interest (SSSI)/ Special Protection Area (SPA) /Ramsar site, it also supports habitat suitable for nesting marsh harrier. It also forms a connection for bird movement between the Royal Society for the Protection of Birds (RSPB) Lakenheath Fen and the Ouse Washes and 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, Breckland SPA, 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 particularly important for wintering birds and 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 project 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 large-scale wet grassland for ground nesting birds to compliment Ouse Washes. Some land has already been restored, others are under planning permissions. - Biodiversity Net Gain habitat banks delivering habitat for bird species - Fens Reservoir NSIP planning to create a large reservoir and large-scale wetland habitat that will benefit bird species.

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 sites support migratory species. These designations should all be 'scoped in' to the ecological impact assessment. The assessment should take into account the recommendations of the Joint Nature Conservation Committee (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 and 7.3.2 We recommend British Trust for Ornithology (BTO), 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 has 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. Table 7.2 The Council does not support 'scoping out' of potential impacts to Berry Fen SSSI (supports wintering birds of the Ouse Washes), Ely Pit and Meadows SSSI given that there is potential for the wind turbines to disrupt movement of species between these sites and the functionally linked land of the Ouse Washes, which they rely on.

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 Council is concerned that the proposed survey methodology does not meet these standards, and given the potential impact to international sites, we were expecting greater survey effort to understand usage of the landscape by birds. The survey work to date, shows the importance of the Proposed Development Site for birds. However, the methodology does not capture how the birds are utilising the landscape for roosting or migrating across the site (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 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 include 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, RSPB / WWT and other experts. In addition, the Council seeks targeted survey work for Common Cranes (known to breed in nearby RSPB Lakenheath) and Marsh Harriers that could also be impacted by the scheme. 7.3.13 The Council disagrees with the approach of limiting Stone Curlew surveys to Redmere North. Stone Curlews surveys should be expanded to include the entire Redmere site, given that Stone Curlews are

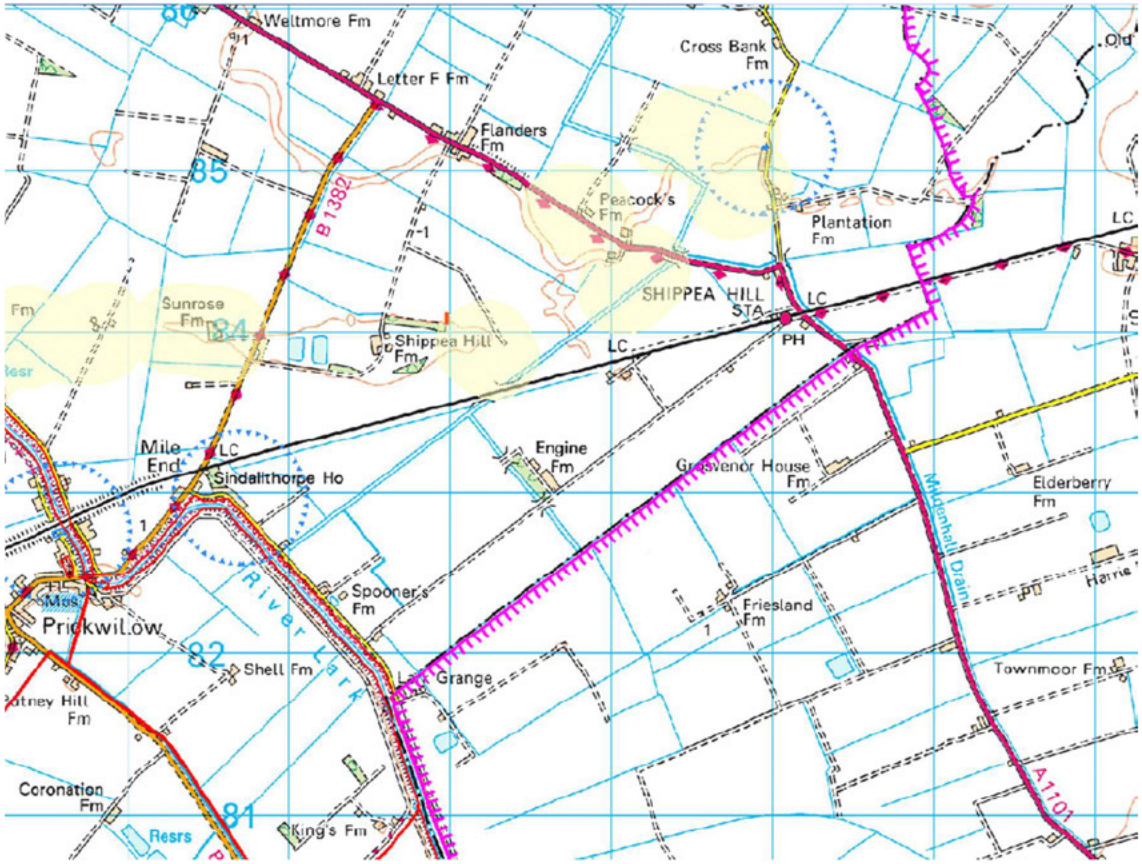
Specialism	Comments
	known to breed in Cambridgeshire. It will be important that survey work provides sufficient level of certainty to demonstrate whether the site supports part of the Breckland SPA Stone Curlew population. 7.3.14 The Council disagrees with the approach to exclude passerines from survey effort. 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 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. Table 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. Common Crane, Whooper / Bewick Swan) and potential impact of loss of habitat, collision risk and displacement. **Notable Flora** 6.3.12 The Council would expect detailed botanical surveys to be completed as part of the ecological surveys due presence of wildlife sites designated for notable aquatic flora (e.g. Black Wing Drains County Wildlife Sites). 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 impact 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, geological interest at Shippea Hill SSSI and watercourses and drains selected as County Wildlife Sites (e.g. Black Wing Drains County Wildlife Site (CWS) and River Lark and Associated Habitats CWS). **Electromagnetic field (EMF) impact** 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, if it unknown whether the impacted watercourses supporting sensitive species, such Spined Loach and European Eel, and potentially 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 County Historic Environment Record, the comprehensive source of information on undesignated heritage assets, archaeological sites and finds in Cambridgeshire.

Specialism	Comments
	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 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 surveys 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. We are 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.

Specialism	Comments
	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. The potential for stepping outside the footprint of construction is acknowledged in the table.
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, King's Lynn and West Norfolk Borough Council, and West Suffolk District Council on this matter. The Council would defer to East Cambridgeshire District Council, King's Lynn and West Norfolk Borough Council, and West Suffolk 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	**Section 17.5 – Waste:** The Council agrees with Scoping in 1. Generation and management of waste during construction, operation and maintenance and decommissioning and 2. Cumulative effects arising from waste generated by the Proposed Development in combination with other relevant developments, including potential pressure on waste-management and disposal facilities. The Council disagrees that "a standalone Waste ES chapter is [should be] scoped out." The topic of waste should retain its own chapter, so it is easily identifiable and assessment clearly set out. **General Comment:** Parts of the site fall within areas designated as Mineral Safeguarding Areas (MSAs) (Sand and Gravel) and within the Consultation Areas (CAs) for Shippea Hill Sewage Treatment Works (STW) and Prickwillow Lark Bank STW (MSAs identified by areas shaded in yellow, CAs identified by a blue dotted circle on the inset map below). These areas are safeguarded under Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP).

Specialism	Comments
	The GIS extents of these constraints are available on the Council's website [Cambridgeshire and Peterborough Minerals and Waste Local Plan | Cambridgeshire County Council]



Mineral Safeguarding Areas – Yellow Shaded; Water Recycling Centres – Blue; Water Recycling Centre Consultation Areas – Blue Dotted Line.

Specialism	Comments
	While not relevant to this Environmental Statement, please ensure the compatibility of the proposed development with the above safeguarded resource and sites are considered in the preparation of any future Planning Statement.
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 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 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

Specialism	Comments
	policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered. Please note, this site falls within the Ely Group of Internal Drainage Boards' (IDB) district. Under the Land Drainage Act 1991, any person carrying out works on an ordinary watercourse in an IDB area requires Land Drainage Consent from the IDB prior to any works taking place. This is applicable to both permanent and temporary works. Note: In some IDB districts, Byelaw consent may also be required. 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.

Specialism	Comments
	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: • 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.

Specialism	Comments
	A Travel Plan for the construction phase should be submitted. Given the potential for overlapping construction periods with both the Chatteris wind farm and the Fens Reservoir, a cumulative traffic assessment needs to be carried out. 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 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

Specialism	Comments
	(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. 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) 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 application. This will inform the mitigation measures that the Council feels are appropriate. The 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

Specialism	Comments
	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. 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 In data sources 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 Redmere wind farm should also include Cambridgeshire County Council highway information.

Specialism	Comments
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(s) 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.

From: Redmere Wind Farm
To: [redacted]
Subject: Fw: EN0110042Redmere Wind Farm - Scoping consultation response
Date: 09 November 2026 12:50:47
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png

From: [redacted]@canalrivertrust.org.uk>
Sent: 12 October 2026 16:50
To: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Subject: EN0110042Redmere Wind Farm - Scoping consultation response

> You don't often get email from [redacted]@canalrivertrust.org.uk. Learn why this is important

Dear Neva Johnson,

Redmere Wind Farm – EIA Scoping and Consultation and Regulation 11 Notification
Planning Inspectorate reference: EN0110042

Thank you for your consultation on the above.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural, and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a consultation body for the purposes of EIA scoping in the NSIP process.

The site area is not within close proximity to our network. The Trust can therefore confirm that we have no comments to make on the proposals. However, pursuant to the charitable objectives of the Trust, we support the preservation, conservation, and protection of inland waterways for the public benefit. We therefore recommend that the proposals identify and consider any waterways, including any restoration projects, that may be affected and that consultation is undertaken with the relevant owners/navigation authorities.

Yours sincerely,

Anne Denby

Anne Denby
MRTPI
Area Planner

M: [redacted]
E [redacted]@canalrivertrust.org.uk

National Waterway Museum,
Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire, England, CH65 4FW
canalrivertrust.org.uk



Help #KeepCanalsAlive **join our campaign. Find out more** www.canalrivertrust.org.uk/keepcanalsalive

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Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.
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Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.
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DPC:76616c646f72

Development Management

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

K Wilkinson
Environmental Services
Planning Inspectorate
69 Buckingham Avenue
Slough
SL1 4PN

Contact Benjamin Kee
Direct Dial [redacted]
Email [redacted]@centralbedfordshire.gov.uk
Your Ref
Date 22 October 2026

Application No: **CB/26/03014/OAC**
Location: **Redmere, Shippea Hill, in East Anglia**
Proposal: **Other Authority Consultation: Redmere Wind Farm**

Dear Karen Wilkinson,

I refer to your letter of 01 October 2026 regarding the pre-planning application as shown above and would confirm that Central Bedfordshire Council has no comments to make.

Yours sincerely,

[redacted]

Anna Bosworth
Service Director Development & Economy

From: Redmere Wind Farm
To: [redacted]
Subject: Fw: Vattenfall Wind Power Ltd Proposed Onshore Wind Farm
Date: 09 November 2026 12:51:43
Attachments: image001.png
image002.png

From: [redacted]@elycity.gov.uk>
Sent: 13 October 2026 12:38
To: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Cc: [redacted]@elycity.gov.uk>; [redacted]@elycity.gov.uk>
Subject: Vattenfall Wind Power Ltd Proposed Onshore Wind Farm

> You don't often get email from [redacted]@elycity.gov.uk. Learn why this is important

The City of Ely Council makes the following observations on the proposed survey and assessment work:-

1)Redmere is in the north ward of the parish of Ely. No drop in event has been arranged in Ely.

2) The proposed site is Grade 1:Excellent Quality Agricultural Land. Land within this grade has little to no limitations to agricultural use. This land can support a very wide range of agricultural and horticultural crops including top fruit, soft fruit salad crops and winter harvested vegetable. Yields are consistently high.

3) The site sits directly underneath a major, vital flight path for thousands of migrating swans. Ever autumn, thousands of Whooper swans (migrating over 800 miles from Iceland) and rare Bewick's swans (migrating 3,500 miles from Arctic Russia) arrive to spend the winter in the adjacent Ouse Washes wetland reserves.

4) The height of Ely Cathedral tower is 217ft (66m); the height of the 32 colossal wind turbines will be 721ft (220 metres). Even without turbines, the Redmere area has historically posed a structural risk to these large waterfowl. Swans have heavy bodies, poor front-facing eyesight and require long landing paths, making it incredibly difficult for them to change direction quickly. Flocks using the Redmere Fen flight lines frequently collide with overhead cables.

5) The Royal Society for the Protection of Birds is in liaison with East Cambridgeshire District Council's ecology team assessing the implications for reserves and local wildlife.

6) These proposals are unprecedented in scale for an onshore wind farm and would add further pressure to communities already facing an extraordinary concentration of major energy infrastructure.

7) According to a Times newspaper report dated 6th October 2026, Britain's electricity grid cannot cope with the wind power currently available and has had to pay wind farmers nearly £1.5bn to switch off because of a lack of cabling capacity.

THE TIMES NEWSPAPER, TUESDAY 6TH OCTOBER 2026 – EMILY GOSDEN, ENERGY EDITOR.

Wind farms paid £1.5bn to switch off – and the bill is rising.

The amount that Britain spends on asking wind farms to power down because the electricity grid cannot cope has already exceeded last year's total.

The cost to consumers of paying wind farms to switch off because Britain's electricity grid cannot cope has already exceeded last year's total of nearly £1.5bn, after September was the costliest month on record. A total of £1.28bn – the majority of the overall amount – has been spent paying gas-fired power plants near urban areas to fire up to replace wind turbines in remote locations that must be turned off because of a lack of cabling capacity. High gas prices resulting from the US war on Iran have pushed up the costs of gas plants and so increased the sums the National Energy System Operator (Neso) has to pay them to help keep the lights on.
The bill has also risen because some existing power lines have been taken out of action for upgrades. This should help to address the issue in the long term but is exacerbating the cabling bottlenecks in the short term. So far this year, Britain has wasted just over £1.51bn switching off wind turbines and paying gas plants to switch on, exceeding the £1.47bn spent in the whole of last year, according to Wasted Wind, a tracker run by Octopus Energy, the household energy supplier. The bill for September alone came to a record £404.3m, with seven of the most expensive days on record. The most expensive day last month was September 30th, when £30m was paid out to energy companies for constraints related to wind farms, Octopus said. Neso has to keep supply and demand balanced across Britain's electricity network in real-time, but this is becoming more challenging as big new wind farms have connected to the grid in remote locations, often in Scotland, without the necessary network upgrades to transmit their power to consumers. The cost Neso incurs in intervening to balance the grid are levied on households and businesses through their energy bills.
Total costs of dealing with all cabling constraints were about £2.2bn in the year to June and Neso has forecast that this will rise to £3.2bn over the 12 months to July next year. The vast majority of this relates to wind farms being switched off, although other power plants are also constrained at times.
A £70bn programme of network upgrades is underway to try to resolve the issue but many of these projects are running late.
The National Audit Office warned last month that the total constraints bill could hit £7.8bn by the end of the decade, equating to about £100 on a typical annual energy bill.
Octopus said that at present some crucial transmission points in Scotland were operating at only 40% of capacity because of temporary outages for grid upgrades.
The company lobbied unsuccessfully for Britain to introduce a system of regional wholesale electricity pricing that would force generators to take account of network constraints and prevent them selling power if the grid couldn't cope. However, this was ruled out by the government last year.
Greg Jackson, founder of Octopus Energy said: "We've already blown past last year's entire bill, and customers are paying every pound of that waste. It's madness. We're spending billions to build more grid, while failing to use our existing infrastructure more efficiently. Instead of paying to throw away homegrown cheap power, we should be using it to bring bills down for households and businesses."
A spokeswoman for the Department of Energy Security and Net Zero said: "Britain's outdated grid is holding the country back. New wind farms, solar projects, and businesses are stuck waiting years for connections, keeping us reliant on global fossil fuels and driving up costs for

households. That's why we're tackling decades of historic underinvestment by reforming the connections queue, launching Great British Grid to unlock billions of pounds of public and private investment and ending the red tape that slows projects down by allowing developers to build their own connections."

The City of Ely Council

Marianne Pickering
Civic and Corporate Services Officer
The City of Ely Council

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DPC:76616c646f72

East Cambridgeshire District Council

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

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

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

This matter is being dealt with by

Victoria Crosby

Email: [redacted]

Phone: [redacted]
My reference: EXT/00016/26
Your reference: EN0110042
Date: 29th October 2026

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

Dear Ms Wilkinson,

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 Redmere Wind Farm (the proposed development)

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

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 as well as the host authorities in Suffolk and Norfolk 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.

General Comments

Firstly, in the interests of clarity, we would ask that at least one of the submitted figures in the future 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 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 EIA Scoping Report, they are not repeated in full here 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 what happens to 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 of the construction, operation, and decommissioning phases, and whether it would be enclosed at all boundaries.

While the turbine locations are indicated with micro-siting allowance, there is no such description of the siting of the BESS, electrical infrastructure, accesses, compounds etc within this large site. The Council notes that the proposed development does not include any off-site export cable route or 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 15km 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 ERM scoping report are couched as "could reasonably inform" and "may include" rather than definitive terms.

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 Environmental Statement (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 assessment work. 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 in this regard.

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.

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 DCO Application, 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, 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 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 mentions 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).

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

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

Biodiversity and Nature Conservation

Overview

The site is within an ecologically important area. Figures 6.1 shows the River Lark which is a County Wildlife Site next to the site, and priority habitats. Figure 6.2 has identified the Special Protection Area, Special Area of Conservation, and the biodiversity-related SSSIs. 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 is an area of the site around Redmere Fen that is within an amber risk zone for Great Crested Newts, and nearby in Prickwillow, 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 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. We think 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 (15km), Nene Washes SPA (approx. 22km). The Ouse Washes SPA (within 50m) and Breckland SPA (30km). The Lakenheath Fens quality also makes the site likely to become a SPA for its Crane and bittern population. Using the precautionary approach the potential SPA must be scoped in as an ‘actual’ SPA. In addition, other national (SSSI) sites would also be appropriately considered if the zone were extended to 15km.

Table 6.1 - Shippea Hill SSSI is not listed, even though the Order Limits run through part of the geological nationally designated site. The Council find this unacceptable and with unknown impacts to the geological feature this should be scoped in for consideration of impacts. We understand it has limited ecological consideration as a SSSI, but the site still sits within the goose and swan IRZ and is likely to be suitable habitat for the migratory birds and this should be considered.

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.

The Ouse washes SPA and functionally linked Goose and Swan IRZ has not been considered and should be scoped in.

Electromagnetic field should be scoped in until such a time that the nature of the impact to aquatic species such as eels (of which Ely is named after), is fully understood which 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 endangered species. Consideration to the existing cable network which is well known to already have a negative ongoing impact on qualifying species of the SPA should also be scoped into the assessment.

Chapter 7

Para 7.2.1 - As referenced in the comments above, and for the same reasons, we 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. and their associated figures.

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. Lakenheath Fen which as previously stated is of SPA quality but not yet designated should be included.

Para 7.3.2 - It is critical that the Wildfowl and Wetlands Trust (WWT), are also contacted for sources of ornithological data, given their research into the migratory patterns of the migratory swans.

Para 7.3.6 & 7.3.7 - the vantage points within the site do not cover the entire Order Limits area, there is also the omission of the importance of the fields adjacent to where the development will be placed. This could also have important bird assemblages that have simply not been recorded. We further note that in Para 7.3.18 the site already shows signs of significant use by significant numbers of waterfowl which will be impacted by the development.

The Council finds this to be unacceptable and potentially undervalues the farmland habitat surrounding the SPAs and the development envelope. In making these comments, we would refer to the following guidance Bird Survey Guidelines | for ecological impact assessment Wild birds: surveys and monitoring for onshore wind farms - GOV.UK.

Para 7.3.11 - as per previous comments, the site has significant links to the Ouse washes SPA, however, nocturnal migratory patterns must also be considered, as most wetland birds migrate at night. Nocturnal birds of prey such as barn owls are likely to utilise the area. Another concern for the council is the links to Lakenheath Fens bittern population and the Ely Pits and Meadows bittern population which is in significant decline already and passage between the two sites must be maintained.

Table 2 - the council finds it unacceptable that multiple SSSIs have been scoped out due to distance. Birds do have the ability to move between nature reserves and often do. All SSSIs where qualifying features are birds should be scoped in. As referred to above, the Ely pits and Meadows bitterns are likely linked to those at Lakenheath.

Para 7.3.9 (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 Goose and Swan IRZ is 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.

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 were not surveyed. In addition, the fields adjacent could be significantly important to a variety of birds which appear not to have been surveyed. As such, we would question the coverage and adequacy of the survey area, which needs to be explained and justified. This principle should apply to all bird surveys.

Figure 7.3 - is missing the goose and swan IRZ showing functionally linked land to the Ouse Washes as mapped by Natural England.

The Council consider that bird displacement should be 'scoped in' as standard sized wind turbines can create a minimum 500m plus displacement (which is within the SPA area and potential SPA area) and cause a significant reduction in bird breeding for small birds such as skylark with subsequent impacts for larger birds being a larger area and this is an essential consideration. This of particular concern in relation to Breeding Marsh harrier already present onsite and skylark which have not been surveyed.

Para 7.3.14 - passerines such as skylark have been shown to be impacted by wind turbines, during the breeding season due to noise and is listed as being negatively impacted by turbines (100% negative response) as reported in Vattenfalls book wildlife conflicts and windfarms Volume 1. We would therefore question the change in methodology to consider a Scottish frame of reference which is not entirely suitable in England.

In combination impacts should also include the Chatteris windfarm for impacts to birds and their related SPAs. The entire Goose and swan IRZ impacts with the combined Redmere and Chatteris Farn with Euabrink (and others) should also be considered.

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

Table 11.1 - should include Shippea hill SSSI and its designated geological features. Currently the redline boundary includes this nationally designated site and it must be assessed as part of any 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.

The wording in section 8.3.6 suggests Ely Cathedral sits beyond the 10km study area, when it sits comfortably within it, at around 6km from the site. Table 8.2 similarly suggests it is a "potentially relevant location." This grade I listed building must be included in the heritage assessment. 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 south and west (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

Paragraphs 9.3.37 and 9.3.41 acknowledge Ely Cathedral as a heritage attraction and recognised viewpoint. 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 1.

The proposed assessment viewpoints do not include any to the west or south of Ely to capture the views 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 west and south of the city suggested by figure 9.7, we ask that at least one further viewpoint be included to show the view looking towards the Cathedral with the proposed turbines behind it, to inform both the landscape and heritage impacts. This should include verified photomontages showing views towards Ely Cathedral from the west and south of Ely, including locations where the turbines could potentially appear within the Cathedral's wider landscape setting.

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 Environmental Statement 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

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.

Hydrology, Hydrogeology, Geology and Peat

A band within the site to the west of Shippea Hill station is an area of groundwater vulnerability and we agree it is appropriate to have groundwater quality scoped in.

At the scale of figures provided it is difficult to be certain whether the site includes or adjoins the SSSI at Shippea Hill, and what development is intended along the road. This needs to be clarified in future discussions. We note that peat depth surveys are on-going, and that an outline Peat Management Plan (OPMP) will be submitted with the application. Chapter 11 does not appear to reference how parts of the site within ECDC are within the minerals and waste safeguarding area, and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021).

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.

Small site areas beyond the main site have been suggested as needing highway works to facilitate the abnormal loads, and we would ask that this be kept under review should further areas be identified, for example for tree works outside the main site within ECDC.

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 River Lark and Little Ouse River (part of the Iceni Way) 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.

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 did 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 lost and how much remain for farming use during the construction, operational and decommissioning stages on this large site is required. 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 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 can 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 harm 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 around the wrong way suggesting most deprived wards for what are likely to be the least deprived.

Aviation, Radar, and Telecommunications

The council would request that, given the height of the proposed turbines and proximity to RAF Mildenhall and RAF Lakenheath (and other similar sensitive receptors) thorough and detailed pre-application engagement is undertaken with the MOD, NATs, and other relevant aviation authorities.

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 by others), the Council considers it is premature to scope out any likely impacts from the grid connection.

The BESS location has not been shown in this scoping opinion 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 Environmental Statement. 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 Reports state 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. As such the Council it important that an integrated cumulative assessment of the Redmere and Chatteris Windfarm schemes be undertaken, given the Applicant is one and the same, including all associated infrastructure that form part of those schemes, alongside other NSIPs and schemes determined by ECDC as LPA.

To provide some examples, figure 18.1c does not appear to refer to Anglian Water's Fen Reservoir project north of Chatteris. Figure 18.1a lists at numbers 1 and 4 the same scoping reference – there is a current application ref. 26/00753/ESO at this site. Location 10 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.

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. The Council also defers to the neighbouring district and county councils for the matters within or affecting land within their administrative boundaries.

Yours sincerely,

Victoria Crosby MRTPI
Major Projects Planning Officer
Planning Department
East Cambridgeshire District Council

cc: David Morren, Strategic Planning & Development Management Manager (ECDC)

Planning Inspectorate
Planning Inspectorate
69 Buckingham Avenue
Slough
SL1 4PN

Dear Planning Inspectorate,

Consultation

Your ref:	
Our reference:	DC/26/3445/CON
Proposal:	Consultation - Onshore wind farm at Redmere
Site:	Redmere Wind Farm , Redmere, Suffolk, .

East Suffolk Council as local planning authority has **no objection** to the above proposal subject to the following comments:

1. No comments to make.

Yours sincerely,

[redacted]

Ben Woolnough MRTPI | Head of Planning and Building Control
East Suffolk Council

Date: 20 October 2026

creating a better place
for people and wildlife

Environment Agency

Planning Inspectorate

Reference: OR-0013310/01

Customer reference: EN0110042

27 October 2026

Dear Sir/Madam

EIA Scoping Opinion Consultation

Redmere 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 Redmere Wind Farm. This consultation was received on 01 October 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,

Morgan Haringman

National Contact Centre: 03708 506 506

Appendix A – Comments on the EIA scope

Biodiversity

Document Reference(s): Redmere 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): Redmere 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): Redmere 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 in for Operation and Maintenance only "subject to confirmation of connectivity".
Impact	Unclear when or how connectivity will be determined or confirmed.
Solution	Scope in public water supply, and include this confirmation in the Environmental Statement (ES).
Additional narrative/explanation:	

It would be beneficial for discussion and confirmation of connectivity to be included in the ES. Given that the applicant has been unable to obtain the information or demonstrate that they can scope it out at this stage, we do not consider it would be appropriate for it to be scoped out at some later point prior to production of the ES.

Public Water Supply is scoped in for the Construction and Decommissioning phase with no caveat (Table 11.1).

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): Redmere Wind Farm EIA Scoping Report, Chapter 11, Tables 11.1 and 11.2, Paragraph 11.3.35	
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 Tables 11.1 and 11.2, 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.

In the BGS GeoIndex Onshore tool, the Mines and Quarries layer has "Feltwell Fens Brick Works" (status "ceased") recorded in the centre of the Redmere North site. We are not satisfied the applicant has reviewed sufficient information to make this scoping decision.

Document Reference(s): Redmere 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): Redmere 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.

Water quality

Document Reference(s): Redmere Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.4.1, Tables 11.1 and 11.2. Redmere Wind Farm EIA Scoping Report, Chapter 17 Other Environmental Topics, 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): Redmere Wind Farm EIA Scoping Report, Chapter 2, Paragraphs 2.2.18 and 2.2.26, and Table 2.1 Redmere 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): Redmere Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.4.1 and Tables 11.1 and 11.2. Redmere Wind Farm EIA Scoping Report, Chapter 17 Other Environmental Topics, section 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): Redmere 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): Redmere 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 Sunnica Energy Farm DCO proposal is situated near Redmere to the south of this proposal's development order limits. The Fens Reservoir is situation near to the North.
Impact	There are likely to be multiple cumulative effects as a result of Sunnica Energy Farm, The Fens Reservoir to the North and this proposal both at construction and operation phases.
Solution	The Cumulative Effects chapter must also include Development Consent Order applications, including the Sunnica Energy Farm and The Fens Reservoir DCOs.

Biodiversity

Document Reference(s): Redmere 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): Redmere 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): Redmere 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): Redmere 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): Redmere Wind Farm EIA Scoping Report, Commitments Register, Paragraph: 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): Redmere Wind Farm EIA Scoping Report, Chapter 6, paragraph 6.3.11	
Issue	Incomplete record of fish species in the desk study.
Impact	Impact-pathways to fish receptors may not be fully or sufficiently considered and assessed.
Solution	According to our records European eel are also present in the Little Ouse River and spined loach in the Twelve Foot Drain upstream. These species should be considered in the assessment.
Additional narrative/explanation: Eel are a critically endangered species and are protected by The Eels (England and Wales) Regulations 2009. It is also highly likely that these waterbodies contain other coarse fish species that form part of the BQE of the WFD classification.	

Document Reference(s): Redmere Wind Farm EIA Scoping Report, Chapter 6, paragraph 6.3.12	
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): Redmere Wind Farm EIA Scoping Report, Chapter 6, paragraph 6.3.13

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.

Groundwater and Contaminated Land

Document Reference(s): Redmere 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): Redmere 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.

Document Reference(s): Redmere 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): Redmere 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): Redmere 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): Redmere 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): Redmere Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.3.18

Issue	We disagree with the characterisation of groundwater flow in peat.
Impact	Model is incorrect and cannot be relied upon.
Solution	Re-characterise this flow.

Additional narrative/explanation:

The site is described as being managed for intensive agriculture in a level controlled drained catchment and is unlikely to have a functional acrotelm. It is likely that the majority of the ground water flow through the peat will occur in the subsurface. It is unclear if the site has had field drains installed as part of its agricultural use, but their presence would increase subsurface flow.

Document Reference(s): Redmere Wind Farm EIA Scoping Report, Chapter 11, Paragraphs 11.3.37 and 11.3.38

Issue	Target depth for further peat probing is less than proposed avoidance thickness. Target depth is insufficient and avoidance thickness is too large.
Impact	Ambiguous avoidance thickness for peat.
Solution	Probe to base of peat. Aim to avoid siting on peat >0.3m where possible.

Additional narrative/explanation:

In 11.3.37, it suggests an intention to avoid peat where possible, where probe depths of >0.3m have been recorded. In 11.3.38 the Applicant appears to give a target thickness of peat greater than 1m to be avoided.

To date, peat probing has only been carried out to 0.3mbgl. Note that SEPA (2017) guidance for further assessment (see Table 2 therein) requires the total depth of peat deposit at each sample point be determined.

Document Reference(s): Redmere Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.5.3

Issue	Probing exercise completed to date may not be 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 narrative/explanation:

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

Document Reference(s): Redmere 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): Redmere Wind Farm EIA Scoping Report, Appendix C Chapter 7, Table 7.1

Issue	WFD status proposed as a measure for Sensitivity Criteria.
Impact	Effects to WFD water bodies may be significantly underestimated.

Solution	It is not appropriate to use WFD water body status to determine the sensitivity of WFD water bodies to adverse effects. 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): Redmere 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): Redmere 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): Redmere Wind Farm EIA Scoping Report, Appendix C Chapter 7, Paragraphs 7.2.6 and 7.2.7 and 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): Redmere 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 & 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): Redmere 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): Redmere 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): Redmere 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): Redmere Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.2.8, and Table 2.1 Redmere 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): Redmere 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): Redmere Wind Farm EIA Scoping Report, Chapter 2, Paragraph 2.2.27	
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): Redmere Wind Farm EIA Scoping Report, Chapter 2, Paragraphs 2.2.28 to 2.2.30	
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): Redmere 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): Redmere 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): Redmere Wind Farm EIA Scoping Report, Chapter 11, Paragraph 11.3.1 Redmere 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): Redmere 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): Redmere 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): Redmere 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): Redmere 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): Redmere 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

Water course 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.

Environment Agency Navigation waterways

We note that both the River Lark and River Little Ouse are in proximity to the proposed development boundary. The Environment Agency has a navigation remit in

relation to these two watercourses. Please contact our navigation teams via WaterwaysAnglian@environment-agency.gov.uk if there any impacts to these watercourses.

From: Redmere Wind Farm
To: [redacted]
Subject: Fw: Redmere Wind Farm EIA Scoping Consultation - EN0110042
Date: 09 November 2026 12:53:20
Attachments: image001.png
image002.png

From: [redacted]@forestrycommission.gov.uk>
Sent: 26 October 2026 16:54
To: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Subject: Redmere Wind Farm EIA Scoping Consultation - EN0110042

> You don't often get email from [redacted]@forestrycommission.gov.uk. Learn why this is important

Thank you for consulting the Forestry Commission on this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

There are no ancient woodlands within the proposed development boundary, although there are several small fragmented areas of mixed deciduous woodland within the site.

Mixed deciduous woodland – Priority Habitat:

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development. Loss of habitat connectivity is a particular concern.

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.

Net Deforestation and Tree Planting:

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.

A scheme that bisects any woodland, will not only result in a significant loss of woodland cover, but will also reduce the ecological value and natural heritage impacts due to habitat fragmentation which will have a negative impact on it's ability to respond to the impacts of climate change.

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.

Where woodland loss is unavoidable, we would expect to see significant compensation and the use of buffer zones to enhance the resilience of neighbouring woodlands. These zones should include further tree planting or a mosaic of semi-natural habitats. There is the opportunity for further tree planting within the project area, in line with the character of the area.

Perhaps with the creation of some additional woodland blocks and hedgerow/hedgerow trees between existing woodland blocks, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole site.

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. However, there are a number of issues that need to be considered when proposing significant 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

Sandra

[redacted]

Local Partnership Advisor
East & East Midlands

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



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DPC:76616c646f72

From: Redmere Wind Farm
To: [redacted]
Subject: Fw: EIA Scoping Consultation
Date: 09 November 2026 12:54:04

From: clerk@freckenham-pc.gov.uk <clerk@freckenham-pc.gov.uk>
Sent: 12 October 2026 22:07
To: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Subject: EIA Scoping Consultation

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Good Evening,

Freckenham Parish Council have no comments.

Kind Regards

Naomi Alecock
Clerk / RFO to the Council
Freckenham Parish Council

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DPC:76616c646f72

From: Redmere Wind Farm
To: [redacted]
Subject: Fw: Consultation Request : EIA Scoping Opinion for proposed development of Redmere Wind Farm, near Shippea Hill
Date: 09 November 2026 12:55:14

From [redacted]@great-yarmouth.gov.uk>
Sent: 13 October 2026 16:16
To: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Subject: Consultation Request : EIA Scoping Opinion for proposed development of Redmere Wind Farm, near Shippea Hill

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Good afternoon,

We have no objections to the proposed development of Redmere Wind Farm, Shippea Hill.

Kind regards,

Ioan

Ioan Cox
Planning Graduate
Development Management
Planning
Great Yarmouth Borough Council

Email: [redacted]@great-yarmouth.gov.uk
www.great-yarmouth.gov.uk
Telephone: [redacted]

GREAT YARMOUTH BOROUGH COUNCIL
LGC Awards 2024 WINNER
LGC Awards 2023 WINNER
Great Yarmouth & East Suffolk England's Cultural Coast
PLACE OUR VALUES • OUR PEOPLE • OUR PLACE

Winners at the LGC Awards 2024 for Council of the Year

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DPC:76616c646f72

Historic England

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: PL00803051
Your ref: [EN0110042]

Telephone: 01223 582729
Date: 29th October 2026

BY EMAIL
redmerewindfarm@planninginspectorate.gov.uk

To the Redmere Wind Farm Casework Team:

Request for a Formal EIA Scoping Opinion for the Redmere Wind Farm Proposed by Vattenfall Wind Power Limited

Historic England has been notified about a scoping request for the proposed Redmere Wind Farm by the Planning Inspectorate via email (dated 1st October 2026). The Redmere Wind Farm is a proposal by Vattenfall Wind Power Ltd to build a wind farm of up to 32 wind turbines, a battery energy storage system (BESS), an on-site substation, and associated infrastructure on two connected parcels of land at the border of Norfolk, Suffolk, and Cambridgeshire.

The Redmere Wind Farm project is considered to be a Nationally Significant Infrastructure Project (NSIP) according to the provisions of the Planning Act 2008 (as amended), and development consent will therefore be required.

The applicant has identified that, because of its nature, size and location, the proposed development would be likely to have significant environmental effects, and should therefore be accounted 'EIA development' according to Schedule 2 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. An environmental impact assessment (EIA) is hence required according to section 4 of these regulations, and the applicant has applied to the Planning Inspectorate for a scoping opinion to determine the required content of the environmental statement.

Historic England, as the government's lead advisor on the historic environment and a consultation body according to schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, would like to offer comments on this

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proposal, taking into consideration the information provided by the applicant. This information includes the Redmere Wind Farm EIA Scoping Report by ERM, and its three appendices.

Historic England Advice

Our primary concern in relation to this proposal is the impact of the development upon the significance of designated and non-designated heritage assets, both from the process of construction and from wider operational effects within the area surrounding the development. Our comments are set out below in sections that correspond to the relevant parts of the report structure.

Chapter 2: Overview

- **Section 2.2: Site Infrastructure and Indicative Design Parameters**

  Paragraph 2.2.3, and associated Figure 2.2: the indicative site layout shown includes only the location of the turbines. As the BESS, on-site substation(s) and other associated infrastructure are likely to contribute to the proposals' environmental impact, these too should be shown. We appreciate that the design of these elements is ongoing (according to paragraphs 2.2.14, 2.2.15, 2.2.17, 2.2.18, and 2.2.19), but some indication of the likely worst-case scenarios could be helpfully included on the indicative site layout to clarify the probable scale and possible configuration of these elements.

- **Section 2.3: Grid Connection**

  Section 2.3 concerns the grid connection for the scheme and the proposed approach to consent and impact assessment. Whilst the applicant acknowledges that a grid connection is a necessary part of the proposals, it is not intended to be included as part of the development for which consent is sought.

  The applicant suggests that the environmental statement (ES) for the present proposals would set out the intended approach to the grid connection and include a consideration of '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' (paragraph 2.3.8). The scoping report goes on (at paragraph 2.3.9) to suggest some possible outline design principles which may be followed in the design of any grid connection.

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We have concerns about the proposed treatment of this element of proposals. As the applicant acknowledges, a grid connection is necessary for the functioning of the proposed development. Whilst it may be contractually and procedurally possible to treat generating station and grid connection as separate elements, they are functionally indivisible; without a viable grid connection the proposed development must remain effectively speculative. We therefore consider that the impacts of the proposed development properly include the impacts of any associated grid connection and that a full assessment of the environmental impact of the proposals should include an assessment of the proposed grid connection.

Whilst the site of the proposed generating station is effectively as far as possible from most heritage assets, any grid connection corridor linking the site to the main substation at Burwell will approach more closely to groups of heritage assets, very likely including designated heritage assets of the highest significance. The potential for impacts on such assets is hence in principle high – likely higher than the potential for impacts caused by the turbines and their associated local infrastructure.

It may be impossible at the present stage to identify with confidence a likely grid connection corridor or transmission method. It should be possible, however, to take a Rochdale Envelope approach and set out a likely worst-case scenario. From the point of view of the impact on cultural heritage, we suggest that such a scenario could include an entirely new line of transmission towers passing close to Soham, or even approaching Ely from the east.

Chapter 4: Site Selection and Alternatives

- **Section 4.6: Applying the Rochdale Envelope**

  The approach set out is in general well-understood and in principle accepted. We recommend, however, that the ‘clear description’ of the developing design parameters and the identification of the worst case scenarios includes their illustration in the appropriate figures (see above).

Chapter 8: Cultural Heritage and Archaeology

Overall, the approach set out in this chapter is acceptable. We note, however, that there is no explicit acknowledgement of the relationship between this chapter and the following chapter,

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which deals with landscape and visual impact. Whilst the assessment of landscape and visual effects is distinct from the assessment of impacts on heritage, there are many points of overlap and there is often value in collaboration. As many (probably most) of the effects of the proposed development on cultural heritage are likely to be visual, considered at large scales, collaboration between the authors of the cultural heritage and archaeology and the landscape and visual chapters would seem particularly sensible. The nature and scope of this collaboration should be determined at this stage, to maximise the benefits.

The landscape and visual chapter includes (in sections 9.3.36–41) a list of viewpoints, many of which relate to heritage assets. We recommend that this list is reviewed by the authors of the cultural heritage chapter of the ES, and revised as necessary; more broadly, we recommend that heritage-specific viewpoints (both photographs and photomontages) that illustrate the ES and support the results of the heritage assessment are included in the landscape and visual impact assessment. Such views should be selected and assessed in full collaboration with the authors of the cultural heritage chapter.

We appreciate that the Zone of Theoretical Visibility (ZTV) is very large, and that a selective approach to the assessment of impacts on cultural heritage is required. This approach is partly set out in section 8.3.6. and in table 8.2. The review of potentially affected sites should be proportionate but rigorous, and should where necessary involve key stakeholders.

In this context we note that Historic England would be very willing to offer advice on potentially sensitive views and assets as part of the design process.

We note that the scoping report has been informed by a preliminary desk-based assessment, and that further desk-based work will be done to inform the developing proposals and the ES. We have not reviewed this assessment, and can therefore offer no opinion about its robustness. The data sources that are proposed to be used in the production of further iterations, as set out in section 8.3.1., are appropriate.

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

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

We would be happy to advise the applicant further on appropriate techniques and approaches to assessment in the fenland environment, developing deposits models and using information gained from sources such as the British Geological Society, as well as maximising information from sharing geotechnical assessment.

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

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

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

Appendix C: Methodologies

The proposed methodology for the cultural heritage and archaeology assessment, as set out in Appendix C, chapter 4, is broadly acceptable. We welcome the explicit move away from a quantitative assessment of impact on heritage significance to a more qualitative, narrative approach, as set out in section 4.3.

Section 4.4.3 gives some more details about the necessary triage of heritage assets to be included in the final impact assessment, and sets out three criteria for inclusion. These criteria are broad; the third in particular ('their location within the ZTV will be used to determine inclusion within assessment') is unclear. In this context we would like to emphasise that triage

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must be undertaken rigorously, and according to expert judgement, rather than according to any bluntly quantitative criteria.

Summary

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

The EIA Scoping Report in places lacks cross-references, particularly between the cultural heritage and landscape and visual chapters. We advise that where relevant, the cultural heritage and archaeology chapter of the ES should be thoroughly cross-referenced to other relevant chapters, and that all supporting technical heritage information should be included as appendices.

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

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

Given the many designated heritage assets within the study area, we would welcome discussions with the applicant in order to refine the approach to the scope of the ES, and to the assessment, enhancement and mitigation.

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Recommendation

Historic England confirms that the historic environment represents a potentially significant issue in EIA terms. We broadly accept the approach to the ES set out in the scoping report, but we have some concerns that need to be addressed, in particular the treatment of any proposed grid connection. We strongly recommend that the environmental effects of the proposed grid connection should be considered in some form as part of this EIA.

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

Yours sincerely,

Tom Taylor

Dr Tom Taylor
Inspector of Historic Buildings and Areas
E-mail: [redacted]@historicengland.org.uk

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Health and Safety Executive

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Email only - redmerewindfarm@planninginspectorate.gov.uk

Dear Ms Neva Johnson

Date: 2 October 2026

PROPOSED REDMERE WIND FARM (the project)
PROPOSAL BY VATTENFALL WIND POWER LTD (the applicant)
INFRASTRUCTURE PLANNING (ENVIROMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) REGULATIONS 10 and 11

Thank you for your letter of 1 October 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

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

According to HSE's records, the proposed **Redmere Wind Farm** project components as specified in the ***EIA Scoping Report Appendix A: Figures, EN0110042, September 2026, Figure 2.1, drawing title 'Site Location '***, do not appear to cross the Consultation Zones of Major Accident Hazard (MAH) sites and MAH pipelines.

Hazardous Substance Consent

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.

If hazardous substances planning consent is required, please consult HSE on the application.

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.

Electrical Safety

No comment from a planning perspective.

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

Yours sincerely

[redacted]

Cathy Williams
CEMHD4 NSIP Consultation Team

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English
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PINS ref: EN0110042
Our ref: 26/70010/SCOP
Date: 27th October 2026
Contact: Lucy Pateman
Email: [redacted]

Huntingdonshire DISTRICT COUNCIL
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

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

Dear Sir/Madam

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

I am writing on behalf of Huntingdonshire District Council (the Council) in response to your request dated 1 October 2026 regarding the Applicant's EIA Scoping Report for the Redmere 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. Having reviewed the information provided, and given the distance between the Proposed Development and the Council's administrative boundary, the Council has limited comments to make on the scope of the proposed ES at this stage.

The Council's primary interests at this stage relate to landscape and visual effects and cumulative effects. Landscape comments provided on behalf of the Council are attached at **Appendix A.**

In relation to cumulative effects, it is noted that the cumulative developments long list will remain under review throughout the EIA process. Figure 18.1c has been reviewed and appears to include planning applications within HDC's administrative area. The Council would welcome the opportunity to review the long list as it is refined. 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.

The Council reserves the right to provide further comments during the DCO process on landscape and visual effects, cumulative effects, and any other matters arising from the Environmental Statement or subsequent consultations that have the potential to affect the District.

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 Lucy Pateman by email: [redacted]

Yours sincerely,

[redacted]

Clara Kerr – Head of Planning, Infrastructure & Public Protection (Chief Planning Officer)
Development Services
Corporate Delivery
Huntingdonshire District Council

HDC Reference: 26/70010/SCOP

Appendix A: 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: 23762
Date: 22 October 2026

For the attention of: Lucy Pateman

Application ref:	26/70010/SCOP
Location:	Redmere Wind Farm
Proposal/Description:	This application is not being determined by Huntingdonshire District Council. Planning Inspectorate Reference EN0110042. 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 Redmere 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 within the administrative areas of East Cambridgeshire, West Suffolk, King's Lynn and West Norfolk District Council. The site is roughly 20km east of the Huntingdonshire District administrative boundary and approximately 6.5km north-east of Ely.

1.2. The site is divided into Redmere North and Redmere South, interconnected by a central route. The site is bounded by agricultural field, farms, villages, highway route A1101 and towns (Ely, Littleport, little Ouse).

1.3. The site is currently an open and rural landscape, formed by existing farmland, agricultural field, watercourses, drainage ditches and deciduous woodland. The RSPB Lakenheath Fen is located next to the site which provided crucial habitats such as lowland fens, reedbeds, coastal and floodplain grazing marsh.

1.4. Natural England (National Character Area Profiles) identifies the site within 46: The Fens National Character Area. The Huntingdonshire Landscape and Townscape Supplementary Planning Document 2022 highlights the key characteristics of The Fens as:

- An expansive landscape, a combination of flat land and sky with long views to distant horizons
- Water management is fundamental, ditches and rivers are prominent in views
- Field boundaries and crops are laid out in regular grids
- Settlement is limited to isolated farms

National Character Area 85: The Brecks and 87: East Anglian Chalk are found within 5km of the site.

1.5. Public rights of way (PRoWs) are scattered in the neighbouring areas. Key public rights of way surrounding the site includes:

- Public Footpath along Brandon Creek which connects to Ely, Littleport, Mile End and Little Ouse (148/15, 148/29, 148/28, 148/23, 148/11, 148/21, 76/15, 76/11)
- Public Bridleway 148/26 next to route A1101

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 from the Huntingdonshire's Local Plan are considered relevant to this application and should be scoped in:

- LP 3: Green Infrastructure
- LP10: The Countryside
- LP 31: Trees, Woodland, Hedges and Hedgerows

2.2. National Planning Policy Framework (August 2026)

This application should also have regard to the policies from the most updated National Planning Policy Framework (August 2026):

- L1-L3: Making Effective Use of Land

- N1-N6: Conserving and Enhancing the Natural Environment

3.0. Review of the proposal/submitted information:

3.1. It is noted that the closest point of Huntingdonshire District to the site area is approximately 25km.

3.2. The site is approximately 20km east of Chatteris Wind Farm NSIP (26/70009/SCOP).

3.3. Section 9.3.47 outlines that a number of visualisations will be included to illustrate the predicted changes in views. This currently includes wirelines; we would welcome confirmation that photomontages will be included where appropriate. We welcome confirmation that the NatureScot guidance for windfarm visualisations is viewed with regard to visual representation of windfarms, as best practice.

3.4. We note that Huntingdon and Ramsey areas are stated as being within the ZTV area, but no viewpoint has been scoped in to assess impacts of these areas.

3.5. 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 B Section 5 Landscape and Visual. We would welcome 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

3.6. We would welcome inclusion of the Ouse Valley Way long distance walking route into People Using Recreational Routes and Open-Access Land section, with a visual receptor included to scope this in.

3.7. Para 9.3 outlines the Landscape and Visual baseline. This does not include the Huntingdonshire Landscape and Townscape SPD alongside national and other local landscape designation. We would welcome the scoping in of 3 Landscape Character Areas (LCAs) within the Huntingdonshire Landscape and Townscape SPD, these include: The Fens; Fen Margin; and Great Ouse Valley.

3.8. Para 9.3.46 states that viewpoints have been chosen to cover [amongst others] short, medium and long-range views. We note that no viewpoints have been included from 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.

3.9. Paragraph 9.3.28 outlines the settlements from where the LVIA will consider visual effects. Two settlements in Huntingdonshire have been considered. A Residential Visual Amenity Assessment (RVAA) will also be included within the LVIA appendix.

3.10. 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.

4.0. Summary

4.1. To summarise, while the proposed Redmere Wind Farm lies outside Huntingdonshire District, it has the potential to generate some limited 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 30km visual effects study area extending into Huntingdonshire.

4.2. We request the assessment of several Huntingdonshire Landscape Character Areas to be scoped in. The proposed use of wirelines is also supported, alongside the inclusion of a Residential Visual Amenity Assessment and we would welcome the confirmation of photomontages to be used. 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 to NatureScot guidance on wind farm visualisations is welcomed.

4.3. No viewpoints within Huntingdonshire are currently proposed to be included within the assessment. Given the potential for effects on receptors within the district as noted in the list of settlement areas, we would welcome the inclusion of representative viewpoints from within Huntingdonshire to ensure the assessment adequately considers views from this area.

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

Place Services – Landscape Team
Email: landscape@essex.gov.uk

Place Services provide landscape 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.

From: Redmere Wind Farm
To: [redacted]
Subject: Fw: EN0110042 - Redmere Windfarm - EIA Scoping and Consultation Response
Date: 09 November 2026 16:56:36

[redacted]

[redacted]

[redacted]

[redacted]

From: clerk@islehamparish.gov.uk <clerk@islehamparish.gov.uk>
Sent: 19 October 2026 11:01
To: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Cc: [redacted]@islehamparish.gov.uk>; [redacted]
[redacted]@islehamparish.gov.uk>
Subject: EN0110042 - Redmere Windfarm - EIA Scoping and Consultation Response

You don't often get email from clerk@islehamparish.gov.uk. Learn why this is important

Good morning,

Isleham Parish Council welcomes the opportunity to respond to the Environmental Impact Assessment scoping consultation for the proposed Redmere Wind Farm.

Members have considered the proposed development and resolved to object to the proposals. The Council recognises that the present consultation relates specifically to the scope and level of detail of the Environmental Statement (ES), rather than determination of the principle of the development. Accordingly, the Council asks that the ES fully assesses the matters set out below so that the potential effects of the development can be properly understood.

1. Landscape and visual effects, including Ely Cathedral

The Council is concerned about the potential effect of a development of this scale on the open landscape character of the area and on long-distance views. The ES should provide a comprehensive Landscape and Visual Impact Assessment covering the full development, including turbines and associated infrastructure.

Particular attention should be given to views towards and from Ely Cathedral, including the contribution the Cathedral makes as a prominent historic landmark within the wider landscape. The Council requests appropriate representative viewpoints from Isleham and the surrounding area and assessment under different weather, seasonal and lighting conditions where relevant. The assessment should also consider the effect of aviation lighting or other turbine lighting where this forms part of the proposed development or is otherwise required.

2. Agricultural land

Members are particularly concerned about the potential loss, disturbance or long-term

sterilisation of Grade 1 agricultural land. The ES should identify the agricultural land classification across all land required for the development and assess both temporary and permanent effects upon the best and most versatile agricultural land.

The assessment should address the land required not only for turbine foundations but also associated infrastructure, construction compounds, access tracks, substations, cabling and the Battery Energy Storage System (BESS), where applicable.

3. Grid connection and associated infrastructure

The Council notes that the grid connection is not currently proposed to form part of the Development Consent Order application. Nevertheless, the ability to connect the development to the electricity network is an integral consequence of a generating project of this scale.

The Council therefore requests that the ES provides sufficient information to understand the likely environmental implications of the anticipated grid connection and related infrastructure, insofar as these are known or can reasonably be assessed, and clearly identifies where separate consenting processes will be required.

4. Cumulative and in-combination effects

The Council considers cumulative impact to be particularly important. The assessment should not consider Redmere Wind Farm in isolation. The Council requests a robust assessment of cumulative and in-combination effects with other consented, proposed and reasonably foreseeable large-scale energy developments and associated infrastructure within the wider area.

This should include, where relevant, the Sunnica Energy Farm and Chatteris Wind Farm proposals, together with other significant solar, wind, battery storage, grid connection, substation and transmission infrastructure. Particular consideration should be given to cumulative landscape and visual effects, agricultural land loss, biodiversity, traffic and transport, construction effects, noise, heritage and community amenity.

Members are concerned that successive large-scale energy schemes could collectively change the character of the wider rural landscape and create the perception of the area becoming an energy generation and infrastructure hub. The ES should therefore assess the combined effect of these developments rather than limiting cumulative assessment to immediately adjacent schemes.

5. Battery Energy Storage System and safety

The proposed development includes a BESS. The Council requests that the ES contains a clear assessment of the potential environmental and community effects associated with the BESS, including fire and other accident or emergency scenarios insofar as these could give rise to significant environmental effects.

The ES should explain the approach to fire prevention, detection and emergency response;

identify relevant receptors; and assess any potential consequences for air, soil, surface water and groundwater arising from a significant incident. Where detailed safety matters fall under other regulatory regimes, the ES should clearly identify this and explain how those regimes interact with the environmental assessment.

6. Construction traffic and local highway effects

Given the scale of the development and associated construction activity, the ES should assess construction vehicle movements, abnormal indivisible loads and proposed access routes. The assessment should consider potential effects on rural roads and settlements within the wider area, including road safety, congestion, noise, vibration, mud and debris, highway condition and effects on pedestrians, cyclists and other vulnerable road users.

The Council asks that potential routes affecting Isleham are identified and assessed where relevant, rather than relying solely on strategic-road impacts.

7. Residential and community amenity

The ES should assess potential effects upon nearby communities arising from construction and operation, including noise, shadow flicker, lighting and visual effects where relevant. The Council also considers it important that the assessment identifies any communities that could experience several different effects simultaneously or sequentially from Redmere and other major infrastructure schemes.

Conclusion

Isleham Parish Council objects to the proposed Redmere Wind Farm on the grounds of its potential landscape and visual effects, particularly in relation to views involving Ely Cathedral; the potential loss of Grade 1 agricultural land; concerns regarding grid connection infrastructure and cumulative impacts alongside other major energy developments; BESS safety considerations; and the wider cumulative transformation of the local rural landscape.

For the purposes of the present scoping consultation, the Council requests that the matters identified above are expressly and comprehensively addressed within the scope of the Environmental Statement. The Council reserves the right to make further representations once more detailed proposals and environmental information become available through the pre-application and Development Consent Order processes.

Best wishes

Rachel

Rachel Nouch - Clerk to Isleham Parish Council

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DPC:76616c646f72

Littleport Town Council

The Barn, Main Street,
Littleport,
Cambridgeshire,
CB6 1PH

To: Planning Inspectorate.

Application: Redmere Windfarm. Your Ref: EN110042

From: Littleport Town Council

Littleport Town Council wishes to formally object to the above proposal. The council has considered the application carefully and has carried out its own research into its likely effects on our town and the surrounding Fenland landscape.

While the council recognises the national need for renewable energy, it does not believe this scheme is suitable for this location. Our concerns relate to the fragile peat soils of the Fens, carbon impact, noise and wildlife, visual impact, transport, food security, defence installations and the absence of any meaningful benefit to the local community. Each is set out below.

Fenland peat soils and the cable route

The council's greatest concern is the effect of the underground cable route on the Fenland peat. Our research indicates that a trench of around 6 metres would in practice disturb a working corridor of up to 20 metres across the land.

Buried high-voltage cables give off heat, and peat acts as an insulating material that holds that heat in. The council is concerned that this will create an 'oven effect' along the route, drying and heating the peat so that it contracts. Fenland peat is already shrinking and wasting year on year, and this scheme would speed up a problem the area is already struggling with.

The consequences go well beyond the cable corridor itself. Ground shrinkage could affect roads as well as the strategic water main that serves the area, and the warmer, drier soil would stunt root development in the crops grown above it. The council asks that the applicant provides full evidence on cable temperature limits and on how the long-term effects on peat will be monitored and put right.

Carbon impact

Peat is one of the country's most important carbon stores. When peat dries and shrinks it releases carbon into the atmosphere. The council is concerned that the disturbance and heating of the peat described above would release a significant amount of stored

carbon. This would undermine the very climate benefits the scheme is intended to deliver.

The council asks that the applicant's carbon assessment fully accounts for the loss of peat along the whole cable route, both during construction and over the lifetime of the scheme.

Noise and impact on nature

There is a clear consensus within the community that noise from the scheme, during both construction and operation, would harm the quiet rural character the people of Littleport value.

The council is also very concerned about the impact on wildlife. Welney Wetland Centre and the Ouse Washes are nationally and internationally important for wintering wildfowl, including the swans that draw visitors to the area each year. The council asks that the effects on these birds, including disturbance to flight paths and feeding grounds, are fully assessed before any decision is made.

Visual impact

The Fens are a low-lying, open landscape with long, uninterrupted views. Any tall structure is visible for many miles. The council believes that no element of the scheme should exceed 65 metres in height, and asks that the applicant's landscape assessment reflects how exposed this landscape is.

Transport

The roads around Littleport are narrow, rural routes, many of them built on unstable fen ground. The council is concerned that construction traffic, including heavy goods vehicles and abnormal loads, would damage these roads and cause disruption to residents, farmers and local businesses. The council asks for a detailed construction traffic management plan, together with a commitment from the applicant to repair any damage to the highway at its own cost.

Food security and fen blow

The Fens contain some of the most productive farmland in the country, and the food market is currently volatile. The council's research suggests that the affected land could see a 45% reduction in yield, equal to a loss of around 176 tonnes of wheat. The council does not believe it is right to take land of this quality out of food production at a time of such uncertainty.

The area is also exposed to high wind speeds and to 'fen blow', when strong winds lift the dry, light peat soil and carry it across the landscape. The council asks how the

scheme's infrastructure would withstand these conditions, and what the risk is that disturbed and dried soil along the cable route would make fen blow worse.

Loss of Agricultural Land

The Council further wishes to draw attention to the cumulative and disproportionate burden this proposal would place upon Littleport. Over recent years, and under successive governments, the parish has already lost a considerable amount of high-quality agricultural land, regarded by many as among the most productive in the country, to housing development promoted through national policy. To use government legislation to force through a further significant loss of land would result in an unfair distribution of that loss onto what has historically been, and remains at heart, a farming community. Moreover, as the population continues to grow, the parish will need corresponding growth in local employment and industrial provision if it is to remain sustainable, and that provision can only realistically be delivered through the release of yet more farmland. Without such employment development by around 2030, the parish's growth could only be supported by substantial investment in commuting infrastructure, which is not currently planned. On that basis, the Council considers that Littleport is being asked to absorb an unreasonable share of development pressure, placing further strain on a community that is already disadvantaged.

Defence installations

Three air bases used by the United States Air Force lie close to the scheme: RAF Lakenheath, RAF Mildenhall and RAF Feltwell. The council asks that the Ministry of Defence is fully consulted, and that any effect on flight operations, radar or the security of these bases is properly assessed.

Community benefit and employment

The council has asked itself who will actually benefit from the electricity this scheme produces. Based on our research, the people living closest to the scheme, who will bear the greatest disruption, will see no benefit from it. The scheme is spread over some 50 kilometres and three counties, and the council questions whether any community benefit would reach the people most affected rather than being spread thinly across a wide area.

Nor does the council's research show any guarantee of local employment. Construction jobs are likely to be short-term and filled by specialist contractors from outside the area, and the scheme would need very few staff once it is running. The council asks the applicant to set out a clear and binding community benefit package, and firm commitments on local jobs and training.

Conclusion

For these reasons, Littleport Town Council objects to this application. The council believes the harm to the Fenland peat, to carbon stores, to wildlife, to food production and to the local community clearly outweighs the benefits being offered. The council respectfully asks that the application is refused. Should it go forward, the council asks to be kept fully involved at every stage.

Yours faithfully,

Diane Lane

Town Clerk, on behalf of Littleport Town Council

MILDENHALL HIGH TOWN COUNCIL

FORMAL OBJECTION – REDMERE WIND FARM

Environmental Impact Assessment Scoping Consultation

Proposed Development: Redmere Wind Farm
Developer: Vattenfall
Proposal: Up to 32 wind turbines, reaching 220 metres in height, together with associated battery storage and infrastructure.

Statement of Objection

Mildenhall High Town Council recognises the importance of renewable energy generation and the United Kingdom's transition towards sustainable energy sources.

However, the Council raises serious concerns regarding the scale, location and potential environmental consequences of the proposed Redmere Wind Farm.

The Council considers that the development, in its current proposed form, presents significant risks and uncertainties that require comprehensive assessment.

The Council therefore **objects to the proposal in its current form**, on the following grounds.

1. Military Aviation Safety and National Security

The proximity of the proposed development to RAF Lakenheath, RAF Mildenhall and associated military aviation operations raises serious concerns regarding flight safety, radar interference, low-level flying activities and potential restrictions on military operations.

The Council requests comprehensive consultation with the Ministry of Defence and relevant aviation authorities and a full assessment of the implications.

2. Ground Stability and Fenland Geology

The Council questions whether the ground conditions of the proposed site are suitable for structures reaching 220 metres in height.

The potential consequences of substantial foundations, excavation, ground settlement and underground infrastructure must be fully assessed.

3. Construction Traffic and Highway Infrastructure

There will be significant transport movements associated with the transportation of turbine components, construction materials and associated infrastructure which will place significant pressure on the surrounding road network, in particular the A14, A11 and A1101. The Council has concerns about severe and prolonged disruption, local road safety and structural highway damage

The Council requests detailed assessments of abnormal-load routes, HGV movements, highway modifications and potential disruption to Mildenhall and neighbouring communities. We seek assurance that construction HGVs and abnormal loads will not be routinely routed through Mildenhall.

4. Landscape and Visual Impact

Turbines reaching 220 metres represent substantial structures within the surrounding countryside which would dominate the landscape.

The Council considers that their visual prominence would significantly alter the character of the Fenland landscape and affect views from nearby settlements. We request that viewpoints and photomontages of the likely appearance from Mildenhall are provided.

5. Residential Amenity, Noise and Shadow Flicker

The Council requests comprehensive assessment of operational noise, and where relevant, shadow flicker and potential impacts on the living conditions of nearby residents.

6. Battery Energy Storage and Fire Safety

The proposed battery storage infrastructure raises questions regarding fire safety and potential environmental contamination.

The Council requests appropriate technical assessments and consultation with the relevant emergency services.

7. Agricultural Land and Food Production

The Council is concerned about the potential loss, fragmentation or degradation of productive fertile agricultural land, taking thousands of acres of Grade 1 agricultural land out of production.

The assessment should examine both temporary construction impacts and long-term restrictions arising from foundations, access roads, cabling and associated infrastructure.

8. Cumulative Impacts

The Council considers it essential that Redmere Wind Farm is assessed alongside other existing, approved and reasonably foreseeable developments.

The combined effects particularly on landscape character, biodiversity, construction traffic and local communities must be considered.

9. Site Selection and Alternative Locations

The Council requests a clear explanation of the environmental and technical considerations informing the selection of the proposed site. A comprehensive site selection matrix must be provided.

Reasonable alternatives, including different turbine heights, layouts and locations, should be examined and explained.

10. Construction Carbon Footprint and Whole-Life Environmental Impact

The Council requests a comprehensive assessment of the carbon emissions associated with manufacturing, transporting, constructing, maintaining and eventually decommissioning the proposed infrastructure.

11. Community Consultation and Cross-Boundary Impacts

The Council considers that a development of this scale requires meaningful consultation with all potentially affected communities. It is disappointing that there were no local drop-in exhibitions by the developer and greater engagement with the local community is essential as the scheme progresses through to the application stage.

Given the geographical extent of the proposal and its potential impacts across administrative boundaries, the Council requests coordinated engagement with relevant local authorities, parish councils, statutory bodies and residents.

12. Community Benefits

The Council is keen to explore opportunities for local community benefit funding and the provision of local jobs. The Council requests early engagement with the developer in this regard.

CONCLUSION

Mildenhall High Town Council considers that the proposed Redmere Wind Farm raises substantial concerns regarding military aviation safety, Fenland ground conditions, infrastructure capacity, landscape character, the loss of agricultural land and the long-term environmental consequences of development on this scale.

The Council considers that these matters must be comprehensively investigated before the environmental acceptability of the proposal can be determined.

Accordingly, **Mildenhall High Town Council objects to the development in its current proposed form** and requests that all matters identified in this representation are expressly considered when determining the scope of the Environmental Impact Assessment / Environmental Statement.

The Council reserves its position pending publication and detailed examination of the Environmental Statement and associated technical evidence.

The Council further requests continued consultation throughout the development consent process.

Wendy Talbot
Assistant Safeguarding Manager
Ministry of Defence
Safeguarding
Defence Infrastructure Organisation
St George's House
DMS Whittington
Lichfield, Staffordshire
WS14 9PY
United Kingdom

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

Application Ref: EN0110042

Our Reference: DIO10072268

Karen Wilkinson
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
SLOUGH
SL1 4PN

29 October 2026

Dear Karen

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 Redmere Wind Farm (the proposed development)

Scoping consultation

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping Opinion request submitted in respect of the Redmere Onshore Wind Farm development. Consultation correspondence was received by this office on 1 October 2026. I write to confirm the safeguarding position of the MOD regarding information that should form part of any Environmental Statement 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, technical sites such as the Military Low Flying System, or maritime defence assets and interests.

The submitted EIA Scoping Report (Ref. 0824465, dated September 2026) and supporting appendices (Appendix A: Figures, Appendix B: Legislation, Policy and Guidance, and Appendix C: EIA Methodologies – all dated September 2026) describe a development comprising up to 32 wind turbines (each with a maximum blade tip height of up to 220m above ground level [agl.] to be achieved using a hub height of up to 134m agl. and a rotor diameter of up to 172m), a battery energy storage system (BESS), a sub-station, and the associated infrastructure. The EIA Scoping Report does refer to the need for a grid connection for the development but does not contain any detail, with the Report stating that the grid connection would form the subject of a separate application and consultation.

The proposed wind turbines would be split between two sites which are shown in the applicant's submitted EIA Scoping Report – Appendix A: Figure 2.2, Site Layout, Project Description, Redmere Wind Farm dated 30/09/2026. The north section containing up to 20 wind turbines is located within an area south of Manorfen Farm, east of the Little Ouse River, west of Cut-Off Channel, and north of RSPB Lakenheath Fen. The south section, which is shown to contain the remaining 12 turbines, is located to the south and west of the A1101, east of the River Lark, and north of Fisher's Drove, Summers Farm, and Alder Farm.

The MOD can confirm that both the north and south sites, and therefore all 32 of the potential wind turbines, are located within statutorily safeguarded areas designed to assure the operation and capability of RAF Mildenhall and RAF Lakenheath. Specifically, the development would trigger:

- statutory consultation zones designed to manage/maintain obstacle free airspace above and surrounding aerodromes where air systems are at critical stages of flight (landing and take-off);

- statutory safeguarding zones drawn to ensure that development does not degrade or compromise the operation or capability of technical (communications, navigation, and surveillance) assets which are crucial to managing air traffic and maintaining aviation safety; and

- statutory safeguarding zones where the potential for development to result in the creation/enhancement of environments that would attract populations of those large and/or flocking bird species hazardous to aviation safety.

Chapter 16 of the submitted EIA Scoping Report provides an overview of the potential effects of the development on Aviation, Radar, and Telecommunications and identifies the MOD as a relevant receptor.

Aerodrome Safeguarding

The proximity of the development to both RAF Mildenhall and RAF Lakenheath, and to the area used operationally by aircraft operating close to those sites, is highlighted at paragraph 16.3.2 which notes that the applications site(s) and to the north and northwest of '*the Lakenheath/Mildenhall Combined Military Aerodrome Traffic Zone (CMATZ). The CMATZ extends to a radius of approximately 5 nautical miles around Royal Air Force (RAF) Lakenheath and RAF Mildenhall and provides protection for military aircraft undertaking take-off, landing and circuit operations. Whilst the CMATZ remains Class G airspace, the proximity of the Site indicates a potentially important interaction with military aviation activities.*' The effect of this proximity is acknowledged, at paragraph 16.3.5 of the EIA Scoping Report, which states that '*military aviation interests are likely to be a particular focus of the assessment.*'

Table 16.1 provides a summary of potential interactions the development might have on a variety of receptors which include military aerodromes, radar, and low flying – it includes specific reference to low flying operations as well as specific procedures being a major consideration for the focus of assessments for the proposed development, and Tables 16.1, 16.2 and 16.3 indicate areas of concern that include military Instrument Flight Procedures (IFPs), safeguarding interests and surveillance.

The proposed wind farm would occupy parts of the statutory safeguarding zone drawn around RAF Lakenheath and RAF Mildenhall within which development with a height of, or greater than, 91.4m agl. would penetrate an obstacle limitation surface and therefore be of particular concern. The purpose of obstacle limitation surfaces is to assure obstacle free airspace where aircraft are approaching, manoeuvring around, or departing from aerodromes. At these times aircraft are at the most critical stages of flight and assured clear airspace is a requirement to preserve aviation safety.

Operational assessment has identified that the development proposed would severely impact on all departure and approach procedures supporting both RAF Mildenhall and RAF Lakenheath which would

include associated radar vectoring airspace. Implementation of the development described by the applicant would result in restrictions which reduce aerodrome accessibility, operational flexibility, and could preclude, delay, or constrain aircraft operations. Operational assessment has also identified that the development would have an adverse effect on 'the availability, resilience, and safe use of instrument flight procedures supporting both RAF Mildenhall and RAF Lakenheath.

The introduction of multiple obstructions to this air space would be considered to result in a significant degradation of aviation safety; as such the impact of the proposed development on operational flying, training activity, the operation of RAF Mildenhall and RAF Lakenheath, and on general aviation should be scoped in.

Given both the scale of the proposed wind turbines and their location relative to both safeguarded aerodromes, as well as there being no known mitigation for the harm caused by their introduction, it is likely that the MOD would respond to consultation on an application for the introduction of wind turbines in the location and of the size described by the applicant with objections.

Technical safeguarding

Chapter 16 of the applicant's EIA Scoping Report also identifies, within Table 16.1, that the proposed wind turbines have the potential to be visible to, and detectable by, to a number of military radars. These radars maintain aviation safety and facilitate air traffic management.

Specifically, the EIA Scoping Report identifies that the wind turbines would be visible to:

- primary surveillance radar and secondary surveillance radar systems at RAF Lakenheath (which also provides air traffic management data used by RAF Mildenhall);
- primary surveillance radar systems at RAF Marham;
- primary surveillance radar systems at Wattisham Station;
- primary surveillance radar systems at RAF Wittering; and
- primary surveillance radar systems at RAF Cranwell;

MOD technical assessment has confirmed that the wind turbines proposed would be visible to these radar systems. Operational assessments indicate that the effect of the development on Primary Surveillance radars at Wattisham Station, RAF Wittering and RAF Cranwell may be scoped out.

In addition, the submitted EIA Scoping Report identifies that the proposed wind turbines would be visible to, and detectable by, Air Defence Radars (ADR) deployed at Remote Radar Head (RRH) Neatishead and RRH Trimingham. MOD technical assessments have confirmed that the proposed wind turbines would be in radar line of sight to both of those sites, however, operational assessments indicate that the effect of the development on the Air Defence Radars at both RRH Neatishead and RRH Trimingham may be scoped out.

For clarity, the effect of the proposed wind turbines on the primary surveillance radar system at RAF Marham, and on both the primary surveillance radar and secondary surveillance radar systems at RAF Lakenheath, must remain scoped in.

Summary

In summary, and on the basis of the information provided, the MOD must communicate significant concerns that the development proposed would:

- penetrate obstacle limitation surfaces drawn to maintain aviation safety above and surrounding aerodromes where aircraft/air systems are at critical stages of flight which would have a significant and detrimental impact on aviation safety, and may degrade or otherwise compromise the operation and capability of two aerodromes by reducing accessibility, operational flexibility, and by precluding, delaying or constraining aircraft operations;

- introduce physical obstructions to aircraft movements resulting in detriment impact on aviation safety; and

- be visible to, and detectable by, radars which facilitate air traffic management which may serve to increase operator workload, increase the complexity of air traffic controller task, and therefore detrimental impact on aviation safety.

In the event that an application were to be submitted for the development as it is proposed in the applicant's EIA Scoping Report, the MOD would likely respond to that consultation with objections.

I trust this adequately explains the MOD position on this Scoping Report and proposed wind farm development.

Yours sincerely,

[redacted]

Wendy Talbot
Assistant Safeguarding Manager

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Gallows Hill, Warwick
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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:
redmerewindfarm@planninginspectorate.gov.uk
29 October 2026

Dear Sir/Madam

RE: APPLICATION BY VATTENFALL WIND POWER LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE REDMERE WIND FARM (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 01ST October 2026 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity substations and overhead transmission lines within close proximity the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Substation
· Burwell Main 400kV Substation
· Burwell Main 132kV Substation

Associated overhead and underground apparatus including cables

Overhead Lines

4ZM ROUTE 400 kV OHL	BURWELL MAIN – WALPOLE 1
	BURWELL MAIN – WALPOLE 2

We enclose a plan showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: https://www.nationalgrid.com/electricity-transmission/network-and-

infrastructure/network-route-maps. You can also check if your works will affect our transmission network by using the Line search website: https://lsbud.co.uk/.

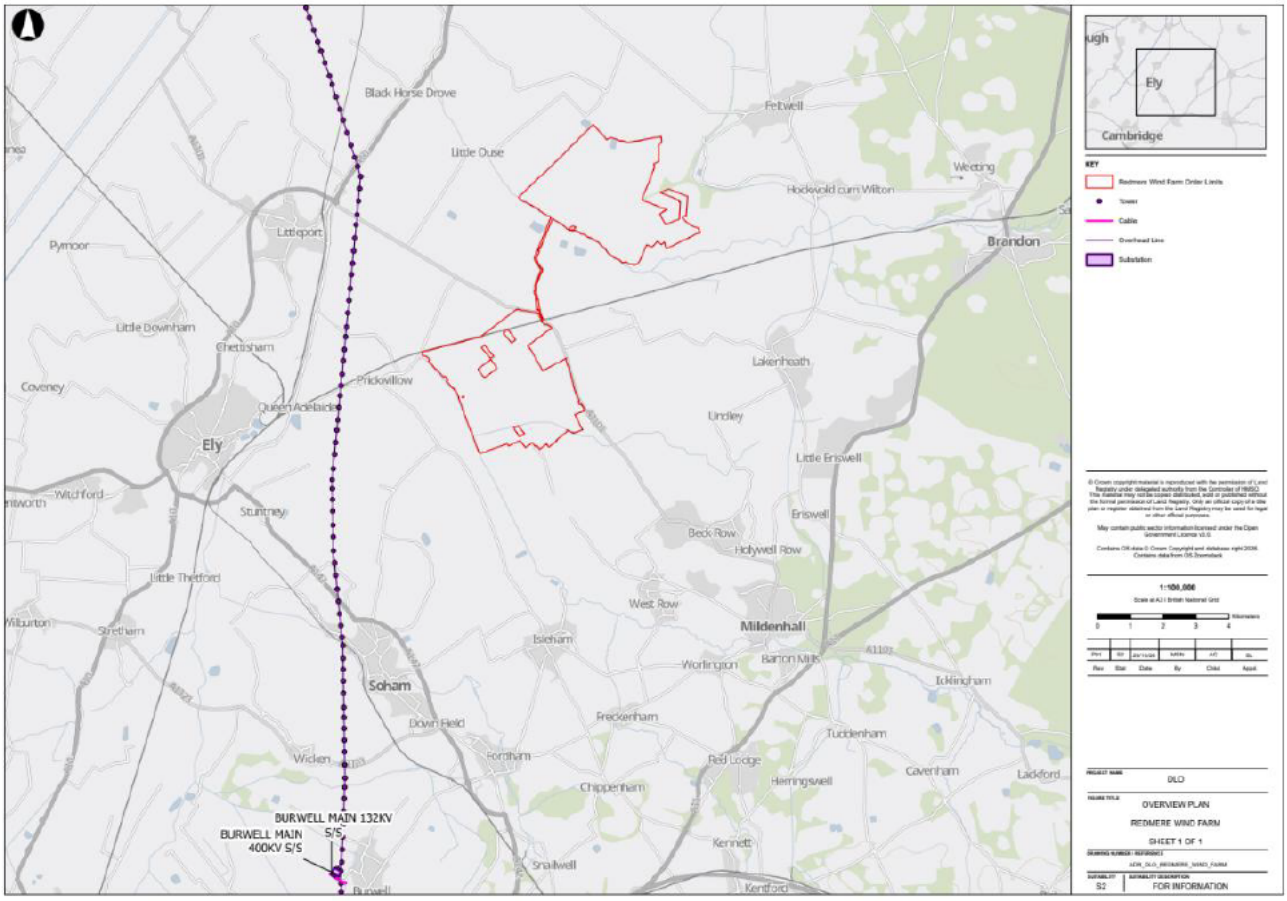

Figure 1: NGET Assets in proposed development area

New infrastructure

The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. Please consult with NESO separately from NGET where further information on the strategic need or capacity is sought.

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network:https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind; and https://www.neso.energy/publications/beyond-2030

Onshore Infrastructure

Redmere Wind Farm is in relatively proximity to several new NGET infrastructure projects. We note that the proposed wind farm is approximately 30 miles west of the Norwich to Tilbury project and around 20 miles south-east of the Eastern Green Link projects (EGL4 and EGL5) and the Grimsby to Walpole project.

These schemes form part of NGET's Accelerated Strategic Transmission Investment (ASTI) programme. A brief overview of the relevant projects is provided below.

Norwich to Tilbury

Norwich to Tilbury is a proposal to build a new 400 kilovolt (kV) electricity transmission connection for approximately 180 kilometres from the Norwich Main substation via Bramford substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation.

The Project includes:

- Approximately 159 km of new overhead line supported on approximately 509 pylons, comprising standard steel lattice pylons (approximately 50 m in height) and low-height steel lattice pylons (approximately 40 m in height). Some structures would comprise gantries, typically up to 15 m in height, within proposed Cable Sealing End (CSE) compounds or existing or proposed substations.
- Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape.

The examination of the Norwich to Tilbury Project ended on 10 August 2026. A recommendation from the Examining Authority is expected by 10 November 2026, with a decision from the Secretary of State anticipated in mid-February 2027.

National Grid Electricity Transmission (NGET) considers that the Norwich to Tilbury Project should be taken into account in the preparation of the Redmere Wind Farm proposals, where relevant to the geographical extent of the projects and their respective construction and operational activities. The potential for spatial and temporal interactions between the projects should be considered as the Redmere Wind Farm proposals are developed, including any implications for construction sequencing, access, environmental mitigation and the management of cumulative effects.

NGET recommends that the Applicant considers the Norwich to Tilbury Project within the Environmental Impact Assessment (EIA) scoping process, where relevant, and identifies any potential for cumulative effects or other interactions between the projects. This should take account of the respective project boundaries, development programmes and the status of the Norwich to Tilbury Project at the time the Redmere Wind Farm application is prepared. NGET welcomes continued engagement with the Applicant to support the identification and, where necessary, management of potential interactions between the projects as the Redmere Wind Farm proposals progress.

Please find out more about these projects on our webpage: ://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/norwich-to-tilbury

Grimsby to Walpole

The Grimsby to Walpole project is critical national infrastructure, it involves the construction of approximately 140 km of new overhead transmission lines extending from Grimsby to Walpole, up to six new substations, and other associated required works. It is an NSIP for planning purposes and therefore a Development Consent Order (DCO) will be required. The project completed Stage 2 statutory consultation in August 2025, and a further statutory targeted consultation between 18th November and 19th December 2025 and is currently scheduled for DCO submission in June 2027.

The Grimsby to Walpole project has been identified as one of several network upgrades that need to be accelerated to help meet increased government targets for renewable energy.

The Grimsby to Walpole Project is a nationally significant infrastructure project (NSIP) and will therefore require development consent under the Planning Act 2008 through a Development Consent Order (DCO). The Project completed Stage 2 statutory consultation in August 2025, followed by a further targeted statutory consultation between 18 November and 19 December 2025. Submission of the DCO application is currently anticipated in June 2027.

The Applicant should engage with NGET to establish whether any potential interactions require further assessment or coordination as the Redmere Wind Farm proposals progress. This should take account of the latest available information on the route, associated infrastructure and programme for the Grimsby to Walpole Project. NGET welcomes continued engagement with the Applicant to discuss potential interactions between the projects and, where necessary, identify appropriate measures to support their coordinated

development and delivery. Please find out more about these projects on our webpage: https://www.nationalgrid.com/the-great-grid-upgrade/grimsby-to-walpole/our-proposals

The EGL Projects

Eastern Green Link 3, 4 and 5 (the "EGL Projects") are a collection of nationally significant infrastructure projects being promoted by National Grid Electricity Transmission (NGET) under the Planning Act 2008. The projects form part of a wider programme of electricity transmission infrastructure connecting the electricity networks of Scotland and England, with each project having a capacity of 2 GW and providing a combined transmission capacity of 6 GW.

EGL3 and EGL4 are classed as Accelerated Strategic Transmission Investment (ASTI) projects, reflecting their strategic importance to the UK's electricity transmission system and the associated funding arrangements through Ofgem. EGL5 has been provisionally identified as a project that will sit within the ASTI funding process.

NGET considers that the EGL Projects should be taken into account in the preparation of the Redmere Wind Farm proposals, where relevant to their geographical extent and respective development programmes. The Applicant should consider the potential for spatial and temporal interactions between the EGL Projects and Redmere Wind Farm, including any implications for construction programming, access, environmental mitigation and the assessment of cumulative effects.

NGET recommends that the EGL Projects are considered as part of the Environmental Impact Assessment (EIA) scoping process, where relevant, and that the Applicant engages with NGET to establish whether any potential interactions require further assessment or coordination as the Redmere Wind Farm proposals progress. This should take account of the latest available information on the routes, land requirements, development programmes and consenting status of the EGL Projects.

NGET welcomes further engagement with the Applicant to discuss the potential for interactions between the EGL Projects and Redmere Wind Farm and to identify any measures that may be required to support the coordinated development and delivery of the respective projects. Please find out more about these projects on our webpage: https://www.nationalgrid.com/the-great-grid-upgrade/eastern-green-link-3-and-4

It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.

NGET requests that all existing and future assets are given due consideration given their criticality to the high-voltage transmission of electricity across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 5 (2019)".

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors. When those conductors are under their worst conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Further Advice

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,



Tiffany Bate
Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)



Rachel Hagan
Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

Technical Guidance Note 287

Third-party guidance for working near National Grid Electricity Transmission equipment



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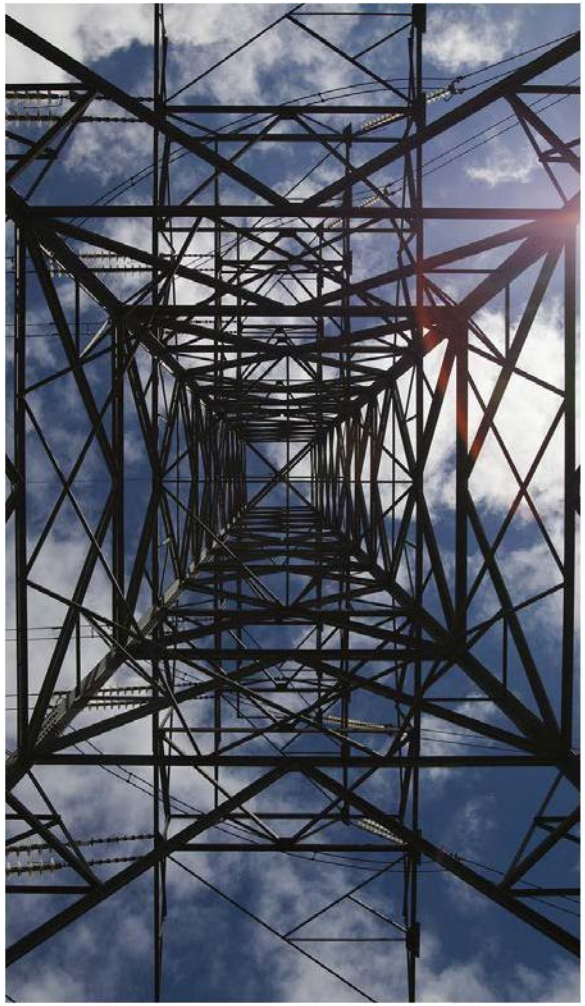


Disclaimer
National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including 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

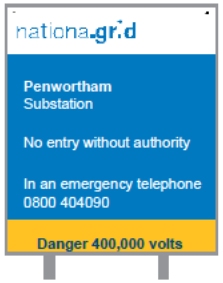
The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

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.

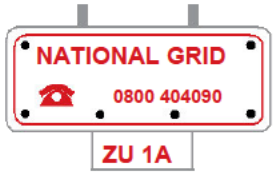
In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National 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: 0800 001 4282

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.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

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.



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: 0800 001 4282

Electrical clearance from overhead lines

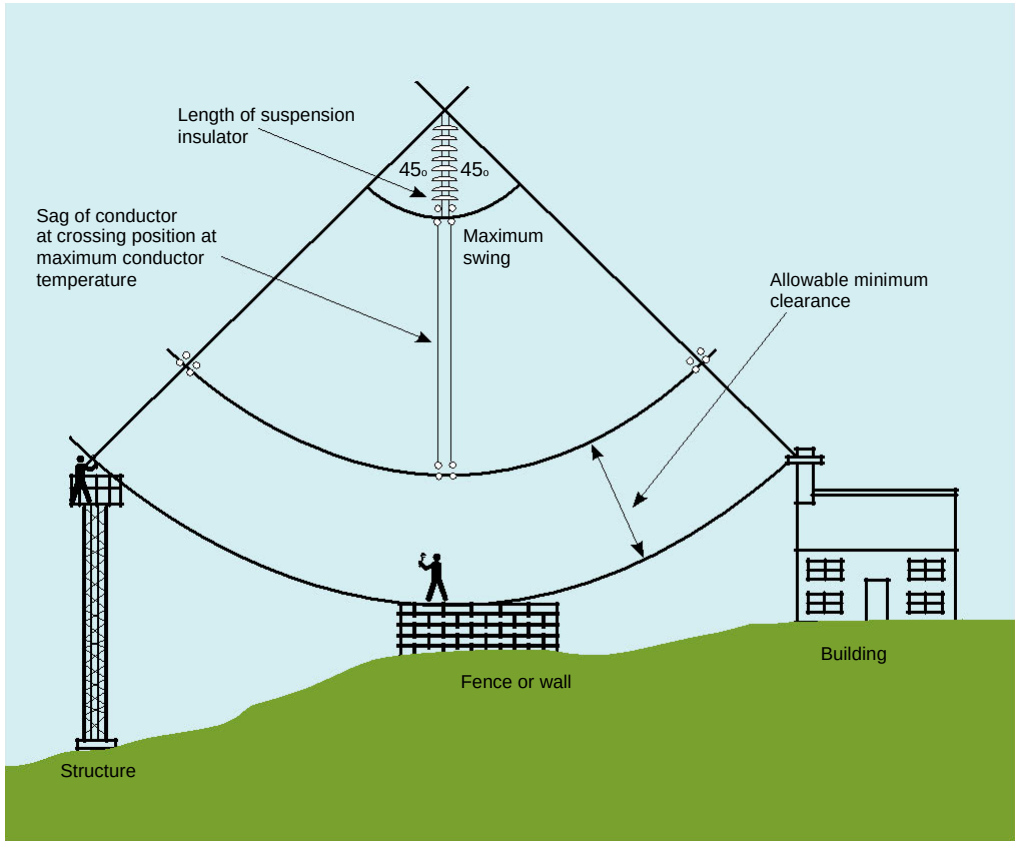
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

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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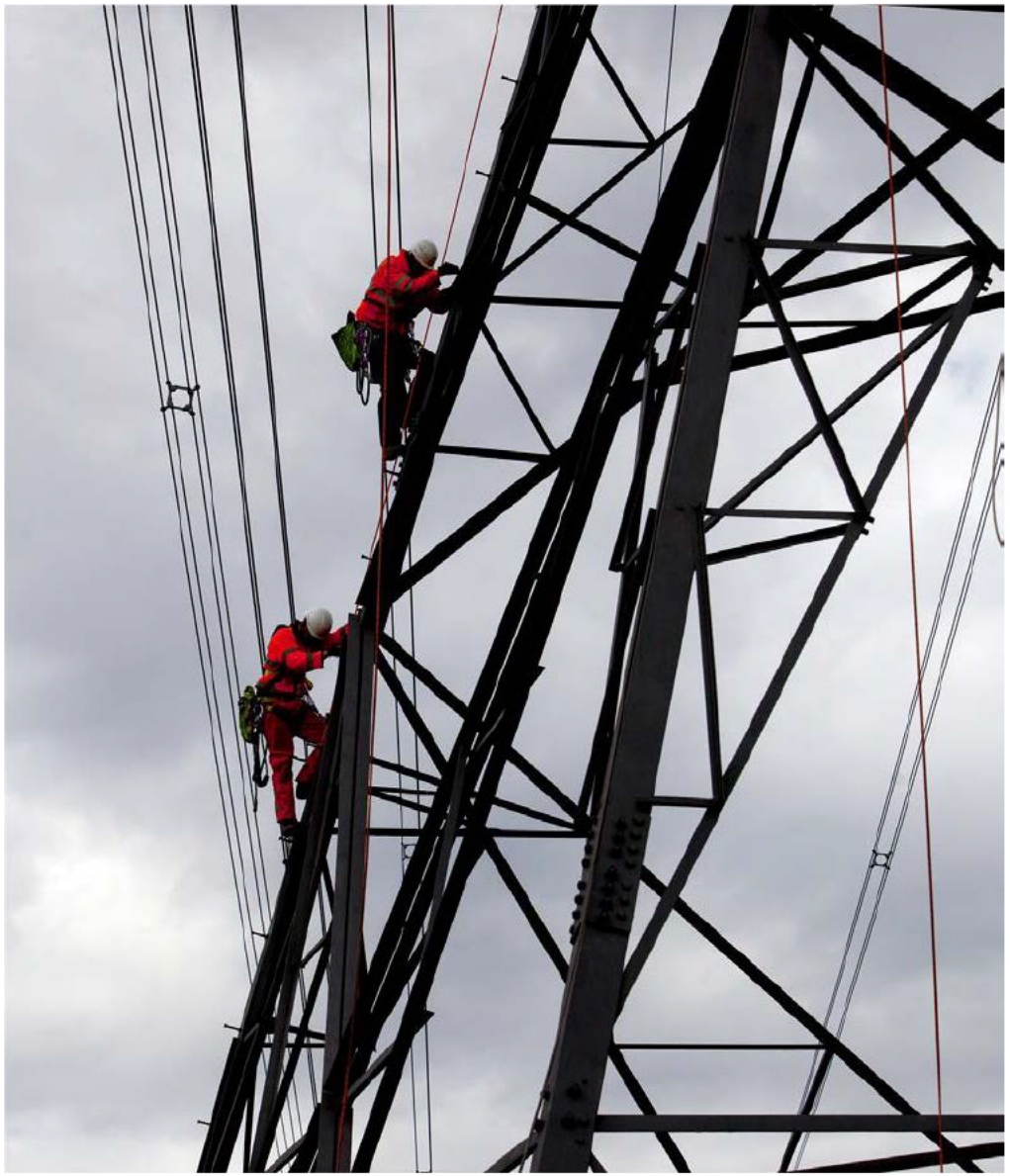

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Fires and firefighting

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.

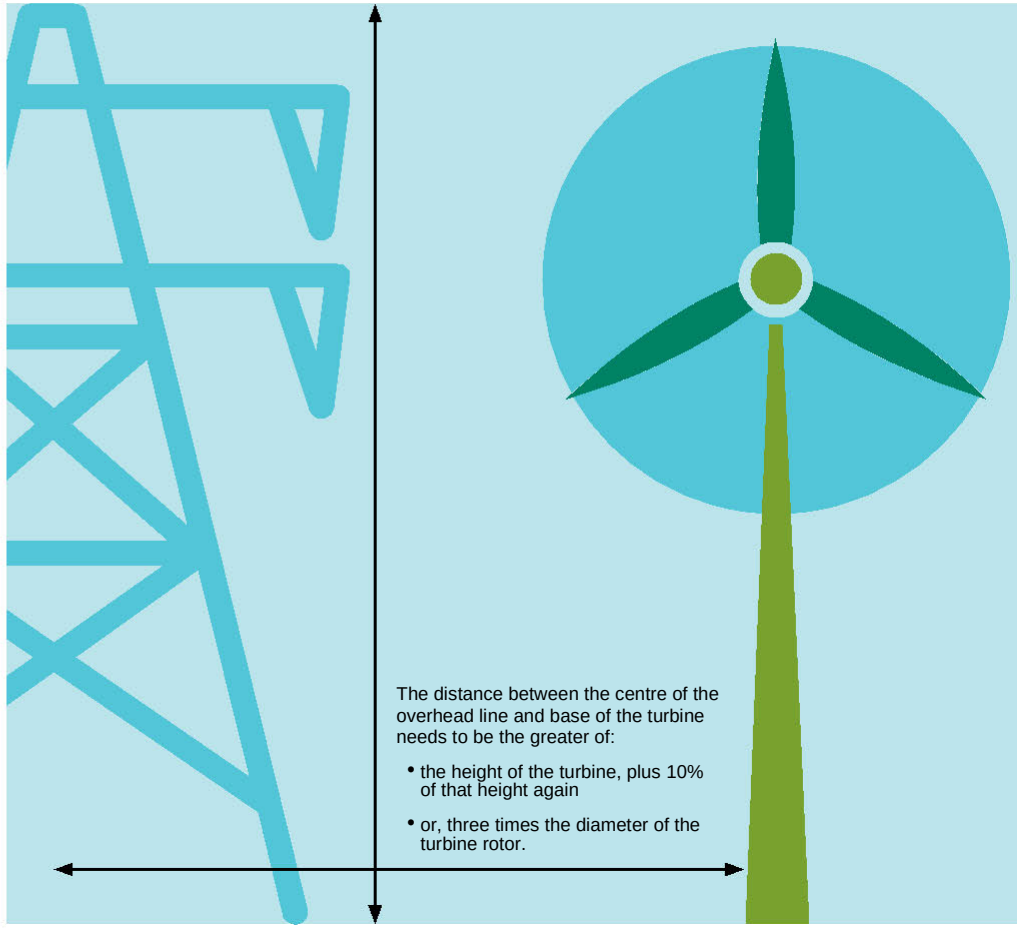
Commercial and housing developments

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.

Section continues on next page »

Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line

« Section continued from previous page

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.

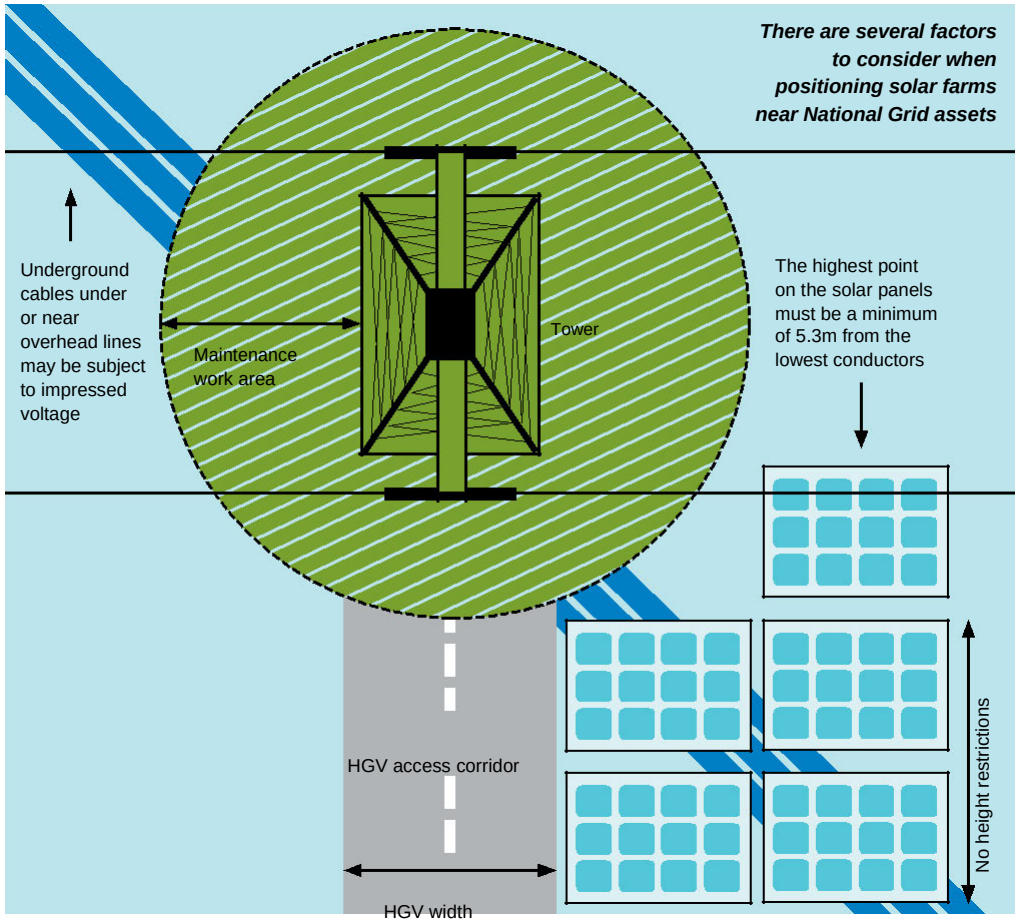
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

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:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

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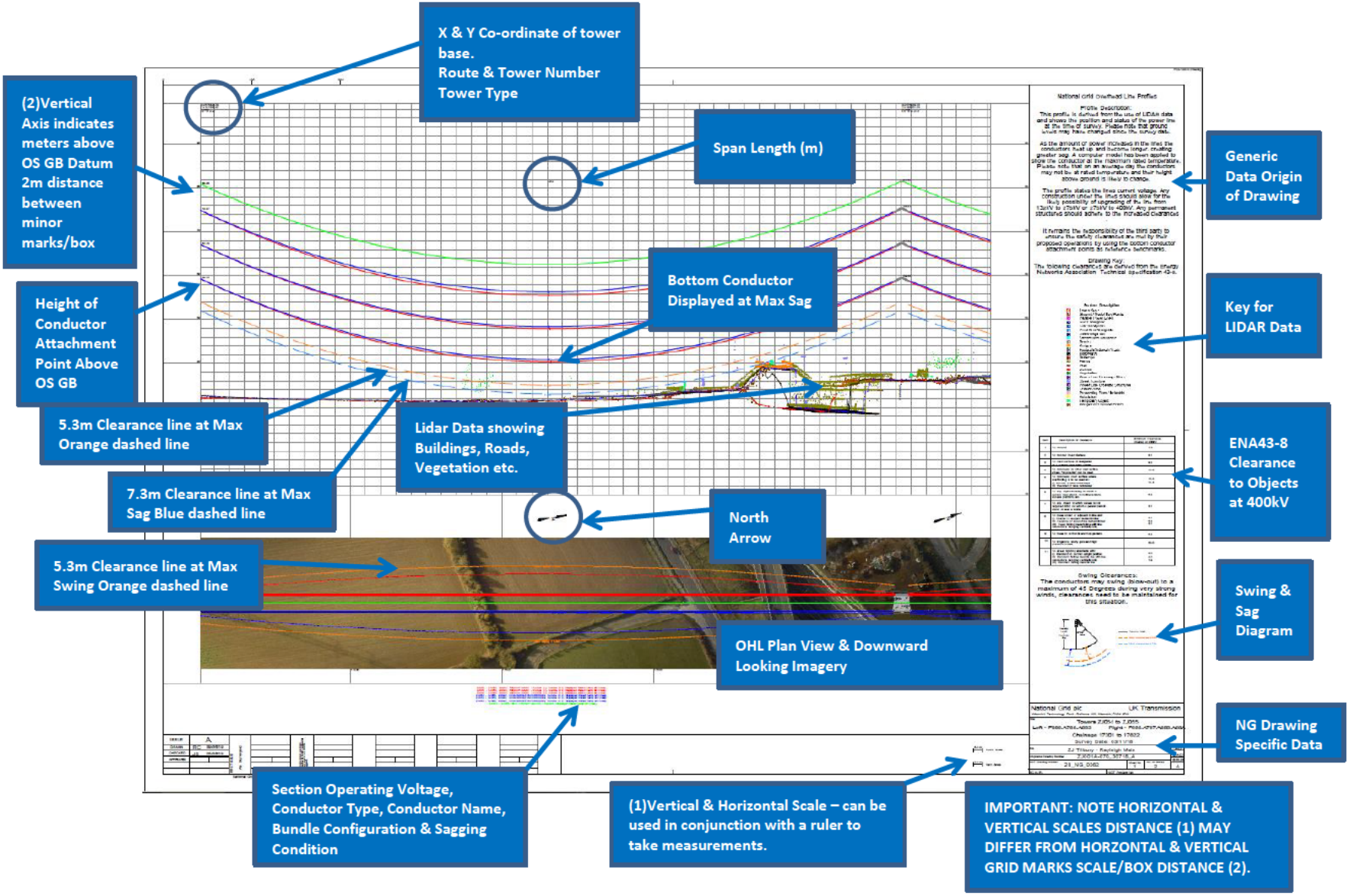
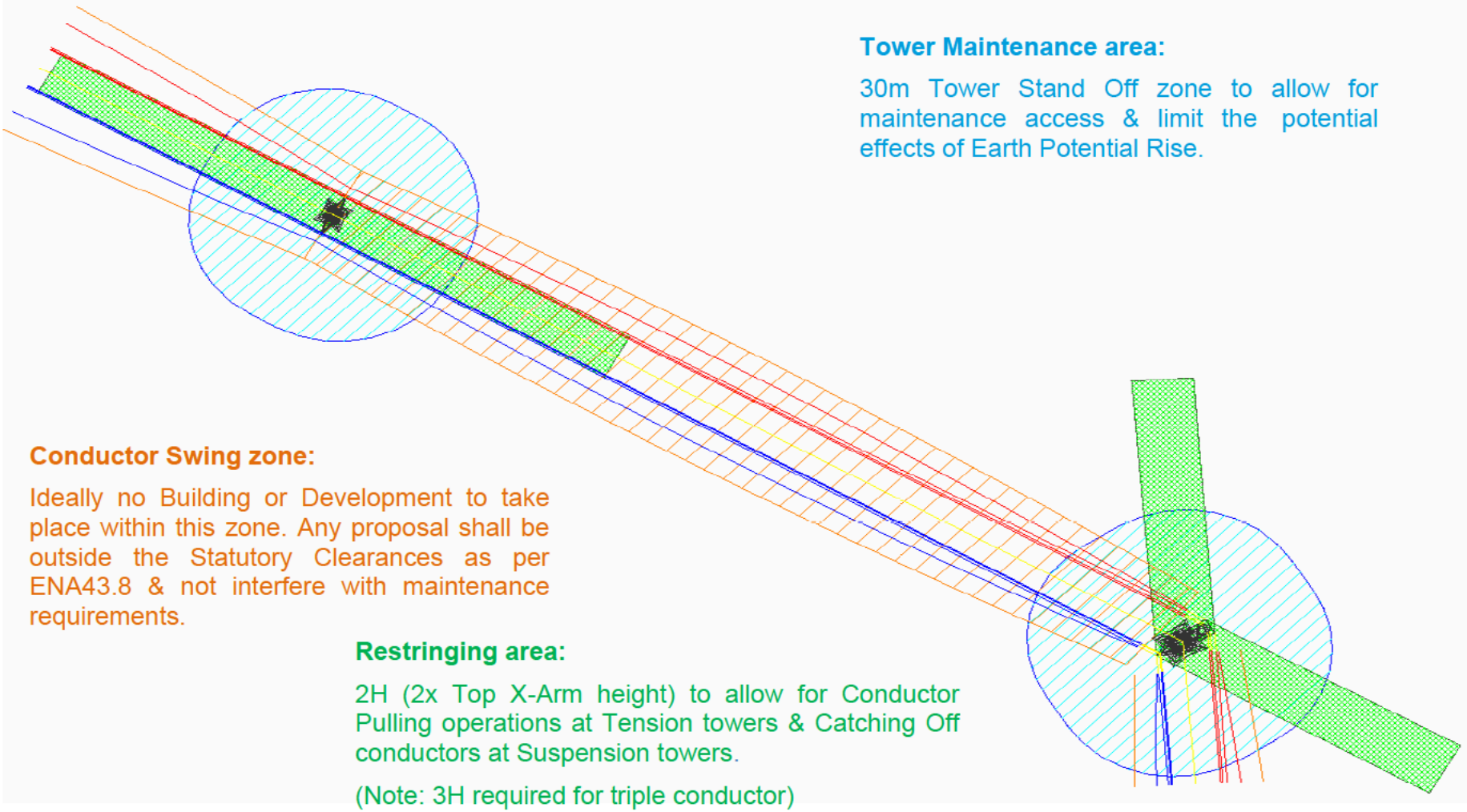
14 APPENDIX A

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/26/18264
Planning Inspectorate Reference: EN0110042

Email:
redmerewindfarm@planninginspectorate.gov.uk

Mark Norman
Spatial Planner
Operations (East)
National Highways
Woodlands
Manton Lane
Bedford MK41 7LW

28 October 2026

Dear Sir/Madam

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

Thank you for consulting National Highways on the EIA Scoping Report for the proposed Redmere 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 focussed its review on Chapter 13 (Traffic and Access) of the EIA Scoping ReportIt is noted that the chapter identifies potential interaction with the SRN, principally the A11 corridor in the vicinity of Mildenhall together with locations on the A14, and A47 where construction traffic may route to elements of the Proposed Development.

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 across

Suffolk, Camridgeshires and Norfolk, 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. The proposed approach to engage with National Highways on the study area, baseline data collection, traffic forecasting and assessment methodology is welcomed as the scheme progresses.

National Highways advises that the ES and supporting Transport Assessment (TA) should include a highway study area agreed with National Highways. The study area should include all SRN 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 SRN links and junctions 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



Mark Norman
Spatial Planner

Operations (East)

Outlook

RE: EN0110042 – Redmere Windfarm – EIA Scoping and Consultation and Regulation 11 Notification [SG42333]

From NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Date Wed 14/10/2026 11:26
To Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>

1 attachment (664 KB)
SG42333 Redmere Wind Farm - TOPA Issue 1.pdf;

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

Our Ref: SG42333

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 SG42333.

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: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Sent: 01 October 2026 10:37
Subject: EN0110042 – Redmere Windfarm – EIA Scoping and Consultation and Regulation 11 Notification

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached correspondence on the proposed Redmere Wind Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, 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 Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **29 October 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

The Planning Inspectorate

Neva Johnson (Nee-va | She/Her)

Associate EIA Advisor

The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

Prepared by:
NATS Safeguarding Office

Technical and Operational Assessment (TOPA)

For SG42333 Redmere Wind Farm Development

NATS ref: SG42333

LPA ref: EN0110042

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

Referenced Documents

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

Planning Inspectorate submitted a request for a NATS technical and operational assessment (TOPA) for the development at Redmere 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	Hub (m)	Tip (m)
1	52.4818	0.4380	565656	289886	134	220
2	52.4783	0.4319	565257	289485	134	220
3	52.4755	0.4386	565721	289190	134	220
4	52.4755	0.4460	566220	289212	134	220
5	52.4740	0.4275	564974	288998	134	220
6	52.4713	0.4334	565386	288713	134	220
7	52.4698	0.4637	567445	288615	134	220
8	52.4698	0.4225	564649	288523	134	220
9	52.4686	0.4145	564111	288372	134	220
10	52.4671	0.4554	566891	288296	134	220
11	52.4654	0.4355	565550	288065	134	220
12	52.4640	0.4244	564800	287883	134	220
13	52.4615	0.4603	567246	287682	134	220
14	52.4631	0.4770	568373	287898	134	220
15	52.4595	0.4678	567763	287478	134	220
16	52.4561	0.4444	566187	287050	134	220
17	52.4569	0.4599	567235	287175	134	220
18	52.4543	0.4665	567699	286903	134	220
19	52.4531	0.4506	566618	286733	134	220
20	52.4504	0.4575	567097	286446	134	220
21	52.4238	0.3819	562057	283313	134	220
22	52.4200	0.3872	562435	282908	134	220
23	52.4192	0.3798	561937	282801	134	220
24	52.4172	0.3961	563053	282607	134	220
25	52.4150	0.3843	562258	282346	134	220
26	52.4096	0.4192	564646	281822	134	220
27	52.4082	0.4023	563506	281621	134	220
28	52.4082	0.4113	564114	281640	134	220
29	52.4022	0.3967	563143	280947	134	220
30	52.4033	0.4047	563688	281091	134	220
31	52.4031	0.4133	564270	281083	134	220
32	52.4038	0.4207	564770	281176	134	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	64.2	118.9	155.8	CMB
Clee Hill Radar	52.3983	-2.5975	109.4	202.6	87.4	CMB
Cromer Radar	52.9104	1.3496	41.7	77.2	230.7	CMB
Debden Radar	51.9902	0.2638	25.2	46.7	12.4	CMB
Bovingdon	51.7090	-0.5411	54.2	100.4	38.7	CMB
Pease Pottage	51.0834	-0.2143	82.4	152.7	16.1	CMB
Stansted Radar	51.8869	0.2301	31.6	58.5	12.2	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

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

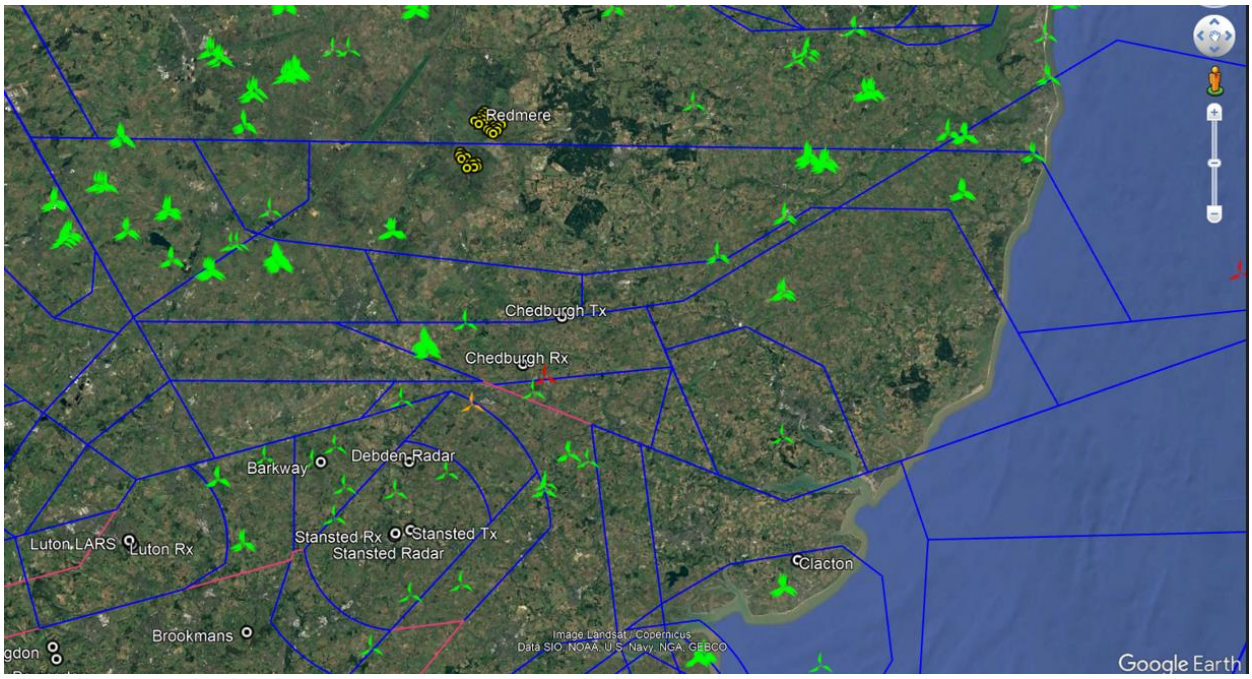

Figure 1: Proposed development location shown on an airways chart

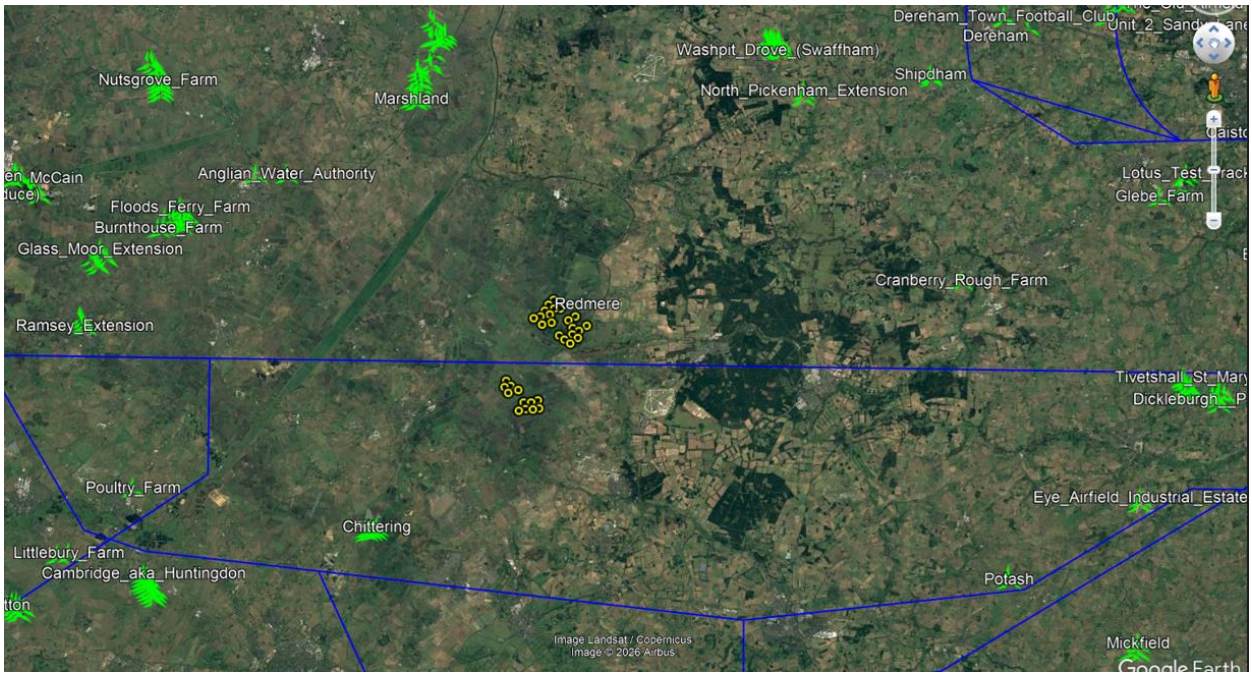

Figure 2: Proposed development shown alongside other recently assessed applications

consented/built | impact –accepted | impact –objection | mitigated
mitigation –proposed | no impact | refused/withdrawn

Date: 22 October 2026
Our ref: 560556
Your ref: EN0110042

Karen Wilkinson
Environmental Services Infrastructure Decisions & Applications Service
Planning Inspectorate
redmerewindfarm@planninginspectorate.gov.uk

BY EMAIL ONLY

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T 0300 060 900

Dear Ms Wilkinson

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 Redmere Wind Farm

Location: Land northeast Of Ely and in the vicinity of Redmere, Feltwell and Lakenheath

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 01 October 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. The site is also likely to be on land functionally linked to nationally important bird populations at RSPB Lakenheath Fen. Robust assessments will be required to be undertaken to determine whether adverse effects on these sites and their bird populations can be ruled out.

Best and Most Versatile (BMV) Agricultural Land and Soils
The proposed development is likely to be entirely located on BMV land. Soil is a finite resource which plays an essential role within sustainable ecosystems, supporting a range of ecosystem services, including storage of carbon, the infiltration and transport of water, nutrient cycling, and provision of food. Natural England would advise that an Agricultural

Land Classification survey is undertaken to best understand the grade of soils across the site.

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 sincerely

[redacted]

Richard Hack
Norfolk & Suffolk team

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.

2. 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):

[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

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 Chatteris Wind Farm and the Fens Reservoir. Results of surveys undertaken for other projects should be considered as far as possible to understand whether there is a cumulative loss of FLL.

We strongly encourage an overall coordinated and holistic approach is adopted for the projects to minimise environmental impacts in this region, and would welcome strategic discussions with the applicant on this.

3. 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 Breckland Farmland Site of Special Scientific Interest (SSSI), a component part of Breckland Special Protection Area (SPA). It is also likely to be located in land that is used by species which are interest features of Ouse Washes SPA and Ramsar, and is also adjacent to RSPB Lakenheath Fen. We recommend the applicant contacts the RSPB (DataUnit@rspb.org.uk) for Stone Curlew records associated with Breckland SPA. The RSPB are also likely to hold records of the bird species using their reserve at Lakenheath Fen.

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.

3.1 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:

3.1.1 Vantage Point surveys

- Natural England's advice for Vantage Point (VP) surveys is that all parts of the survey area should be visible within 1km of the VP except for large birds. Where this is not the case, justification should be provided in the survey report.
- We note that some areas within the red line boundary are not covered by the viewsheds. An explanation and justification for this should also be provided.
- Natural England advises that two years of VP surveys is required to understand potential impacts from displacement and collision with the turbines from flights across the site (see below). The aim of VP watches is to quantify flight activity at the site – providing data to assess displacement impacts and collision risk.

Observations should include estimates of flight height in relation to rotor height, direction and flight behaviour.

Further details on VP methodology is available in the NatureScot guidance Recommended bird survey methods to inform impact assessment of onshore windfarms. Note Natural England's advice differs in that we advocate no longer than two-hour watches whereas NatureScot advocate a three hour maximum. We advise that timed watches should last no longer than two hours – any longer period risks observer fatigue and under-estimation of bird movements.

3.1.2 Displacement

Natural England advises that 600m is a suitable precautionary displacement distance for 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 envelop.

3.1.3 Collision risk

Assessment of the collision risk should use the latest Collision Risk Avoidance Rates. We welcome the reference to the NatureScot guidance within Appendix C (Wind farm impacts on birds - Use of Avoidance Rates in the NatureScot Wind Farm Collision Risk Model). This contains the collision risk avoidance rates for various sensitive species.

4. Biodiversity and geodiversity

4.1. 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). There might also be strategic approaches to take into account.

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 National Planning Statement for Renewable Energy Infrastructure (EN-3) (Department for Energy Security and Net Zero, December 2025), which sets out the biodiversity, ecological, hydrological and environmental considerations for onshore wind proposals.

4.2. 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):

- Breckland SPA
- Ouse Washes SPA
- Ouse Washes Ramsar

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.

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

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**
	• 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.
Breckland SPA (Designated Sites View)	Evidence has shown that Stone Curlews respond to visual disturbance including road traffic, walkers and dog walkers up to 500m away[3]. They could therefore be disturbed by human activities during construction, operation and maintenance. Although we note that nocturnal surveys have been carried out (paragraph 7.3.13 of the EIA Scoping Report) we also recommend that nest surveys should follow the RSPBs Daytime Survey Methodology for Stone Curlew. Stone Curlew nest density has been shown to be negatively impacted by the built environment, with lower nest densities found up to 1.5km from settlements and major roads[4]. Whilst we are unaware of any research in the UK into the impact of wind turbines on Stone Curlew, a precautionary approach should be taken to assessing impacts on them. They have been found to travel up to 13km to forage[5] so collision risk, reduction in the suitability of breeding and foraging habitat, displacement and potential barrier effects should be considered. Further site-specific advice can also be found in Breckland SPA Supplementary advice on conserving and restoring site features.

4.3. Nationally designated sites – Sites of Special Scientific Interest

The development site may impact on the following Sites of Special Scientific Interest (SSSI):

- Breckland Farmland SSSI (SSSI detail)
- Ouse Washes SSSI (SSSI detail)
- Stallode Wash, Lakenheath SSSI (SSSI detail)

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 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

[3] Taylor, E.C., Green, R.E. & Perrins, J. (2007) "Stone-curlews *Burhinus oedicnemus* and recreational disturbance: developing a management tool for access". Ibis, 149, pp.37-44.

[4] Sharp, J., Clarke, R.T., Liley, D. & Green, R.E. (2008). "The effect of housing development and roads on the distribution of stone curlews in the Brecks. Evidence to support the Appropriate Assessment of development plans and projects in Breckland". Footprint Ecology

[5] https://wadertales.wordpress.com/2021/02/26/grassland-management-for-stone-curlew/

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.

Breckland Farmland SSSI 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.

The applicant has not identified any SACs for which bats are a qualifying feature within 30 km of the proposed site (paragraph 6.3.8). We advise however that there are SSSIs within this distance for which bats are a designated feature and these should be scoped in for further assessment.

Shippea Hill SSSI has been excluded as it is stated that it's geological features will not be affected. The site is immediately adjacent to the access route to Redmere North. The SSSI is designated for records in peat, and is more vulnerable than other geological SSSIs where the interest is mineral. There are potential impacts from changes in water table or drainage which could cause the buried peat to dry out, oxygenate, and rot. Therefore, we advise that buried cables close to the SSSI or any work on ditches near the SSSI should be scoped in.

4.4. 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.

As noted in part 3 above, the proposed development is close to RSPB Lakenheath Fen. Although part of the site is designated as Stallode Wash, Lakenheath SSSI, the majority of the site does not have a national or international designation. However, we are aware that it is home to nationally significant populations of several bird species, including Bittern, Common Crane and Marsh Harrier. These may also use the designated habitats at Ouse Washes and are likely to face the same potential impacts as the species which are designated features of national and international sites.

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.

5. 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 Nationally Significant Infrastructure Projects (NSIP): Advice on working with public bodies in the infrastructure planning process, Annex C: Natural England and the Planning Inspectorate - GOV.UK 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.

6. 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.

7. 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

8. 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.

9. 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 a BNG Strategy will be 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.

10. Landscape

10.1. 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.

10.2. 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.

11. Soils and agricultural land quality

The applicant has acknowledged (paragraph 15.3.7) that the entirety of the site is likely to be on best and most versatile (BMV) agricultural land. 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 BMV agricultural land must be considered. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including how much BMV agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see https://magic.defra.gov.uk/.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare (or more detailed for a small site), supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, public open space).
- 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.

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.

Natural England welcomes the reference to the Scottish Government Peatland survey: guidance - gov.scot (paragraph 11.3.37). We support the guidance in this to undertake a peat survey to determine the depth of the peat at a density of 100m x 100m on a regular grid pattern across the whole area proposed for development, which is consistent with the survey frequency of detailed ALC survey. The ES should include details of the method of the preliminary peat depth survey. We also advise that a map showing the actual depth recordings is submitted.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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[6] 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

[6] 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.

NHS
Central East
Integrated Care Board

NHS Central East ICB
Gemini House, Bartholomew's Walk,
Cambridgeshire Business Park, Angel Drove,
Ely, Cambridgeshire, CB7 4EA

Date: 27th October 2026

[redacted]@nhs.net

Sent via email: redmerewindfarm@planninginspectorate.gov.uk

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

Dear Sir/Madam,

Re: 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 Redmere 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 NHS Central East Integrated Care Board (CEICB) on the applicant's proposed scope of the ES relating to the above-mentioned proposed development.

NHS
Central East
Integrated Care Board

The NHS CEICB has produced a five-year Strategy called *'Our Way'*, published on 1st April 2026, which sets out a five-year approach to health commissioning, built on improving quality in terms of access to, experience of, outcomes of, and effectiveness of health services, with *quality* being the mechanism through which the CEICB will deliver a sustainable NHS for the population it serves.

Integral to the NHS CEICB's five-year Strategy is neighbourhood health which focusses on delivering joined up, local, preventative care at a neighbourhood level. Primary and community health services will act as the anchor of neighbourhood delivery, providing continuity, proactive management of long-term conditions, and coordination across the NHS, social care, local authorities and the voluntary sector, integrated around people and places.

The CEICB has reviewed the 'human health' section of the proposed Scoping Report. It is noted that any significant effects on human health will not be assessed within a standalone chapter of the ES, with human health impacts instead spread over other chapters. This approach appears sensible subject to appropriate cross-referencing and explanation, and a summary of the human health impacts within an 'Other Environmental Issues' chapter.

With regards to the intention to 'scope out' a standalone chapter on major accidents or disasters, the CEICB would wish to see all shortlisted accidents or disasters to be fully considered within the ES, rather than considered throughout the design process.

Yours faithfully,

[redacted]

Rachael Donovan
Town Planning Policy Lead
Driven by one question: what best serves our population?
NHS Central East ICB

Redmere Wind Farm Farm Project

Planning Inspectorate Reference EN0110042

Planning Act 2008 & The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

EIA Scoping Consultation

Norfolk Constabulary Response

to

The Planning Inspectorate

October 2026

Duncan Potter

Head of Estates

Norfolk & Suffolk Constabularies

[redacted]@norfolk.police.uk

Proposed Application by Vattenfall Wind Power Ltd for an Order granting Development Consent for The Redmere Wind Farm

Norfolk Constabulary Response to the EIA Scoping Consultation

Introduction

1. Norfolk Constabulary is responding to the Planning Inspectorate (PINS) notification letter dated 1st October 2026 sent to the Police & Crime Commissioner for Norfolk.

2. PINS advise that Vattenfall Wind Power Ltd (the Applicant) has requested its written opinion (Scoping Opinion) as to the scope and level of detail, of the information to be provided in the Environmental Statement (ES) in relation to the proposed wind farm project (the Project).

3. Norfolk Constabulary has reviewed the Applicant's EIA Scoping Report dated September 2026, which sets out the intended scope of the ES, and outlines the information it considers should be provided in the ES below. A concise scheme description is included in **Annex 1**.

4. Norfolk Constabulary (NC) is the relevant Police Authority in respect of the Project Site Area located within Norfolk - and a 'Prescribed Consultee' in this DCO process, pursuant to The Infrastructure Planning (Applications: Prescribed Forms & Procedure) Regulations 2009.

5. It is noted that Suffolk Constabulary (SC) and Cambridgeshire Constabulary (CC) are the relevant police authorities in respect of the Project Site Area(s) located within Suffolk and Cambridgeshire respectively.

6. NC and SC collaborate closely, and have significant experience in assessing the service impacts arising from Nationally Significant Infrastructure Projects (NSIP's) related to renewable energy and electricity network infrastructure. NC outline its information requirements within this context below.

Project Scope & Impacts

Abnormal Indivisible Loads

7. NC consider that the Project is likely to have a **Major Adverse Effect** on police services in terms of impact on the capacity of its Local (Community) Policing and Roads Policing Teams during the construction phase.

8. This principally relates to the requirement for police escorts to accompany (and highway manage) Abnormal Indivisible Load (AIL) deliveries to site compounds from the expected Port of Origin at Great Yarmouth.

9. NC move AIL's through the use of trained Roads Policing Officers on overtime - capacity to do so is limited and needs to be shared in a fair and equitable manner with all parties who require this service.

10. Unless appropriate **Mitigation** is agreed with an Applicant (developer) usually in the form of a 'bespoke solution for AIL resourcing requirements', and in a timely manner allowing for the additional police resources to be stood-up, AIL loads would be moved on a **Business as Usual (BAU)** basis.

11. **BAU** would limit all/ any AIL movements requiring a police escort to an 'as and when availability allows' approach related to NC baseline resources.

12. The information to be incorporated within the ES and/ or in an accompanying technical document to identify the likely **Impact** of AIL's, including the **Cumulative Impact** arising from other NSIP's, and **Mitigation Parameters** is outlined in **Table 1** below.

13. It is recommended that early contact is made with the NC Abnormal Loads Officer, Amy Delacruz, [redacted]@norfolk.police.uk to discuss the information requirements for modelling AIL impacts and related mitigation parameters.

Other Project Impacts

14. The information to be incorporated within the ES, or in an accompanying technical document to identify **Other Impacts**, and the likely **Mitigation Parameters** is outlined in **Table 2** below.

Table 1 - Abnormal Indivisible Loads: ES Information Requirements & Norfolk Local Policing & Roads Policing Mitigation Parameters

AIL Information Requirements	Mitigation/ Management Parameters
Confirmation of Port(s) of origin Confirmation of routes for loads/material for the Project requiring police escorts Confirmation of numbers & dimensions of AIL's Confirmation of likely frequency/ timelines for the programming, commencement & completion of AIL movements Confirmation of the cumulative impact arising from other NSIP's The above information is required to model the demand for police escorted loads & project need for AIL escort trained officers: A necessary period is required to allow for commensurate uplift in recruitment of additional capacity to facilitate demand arising	Recruitment of AIL trained officers to meet project demand over 2-year construction period (dates to be confirmed) A necessary 18-month stand-up & 6-month stand-down period is usually required to allow for commensurate uplift in recruitment of specialist trained officers to facilitate demand & manage officer deployment in line with police regulations and resource planning. ***1 *2**

Footnotes

*1 Officers required for a bespoke AIL solution are costed against the nationally recognised National Police Chief Council (NPCC) rates, which includes a commensurate uplift in the vehicles, equipment & back-office support for the officers

*2 Any necessary mitigation & management measures to be secured via a Development Consent Order (DCO) Requirements(s) & a planning obligation

Table 2: Other Project Impacts – ES/Technical Study Information Requirements

No	Project Impact	Information Requirements & Mitigation/ Management Parameters
1	Population increase related to construction workers & accommodation strategy	A schedule of home - based & non-home - based workers, along with appropriate supporting information Construction worker profile/ identification, communication, reporting, welfare & management information & procedures *1 *2
2	Crime, community safety & policing: construction compounds - crime risk related to the presence of plant/machinery/equipment/materials located in construction compounds	Engagement with Police designing out crime & crime prevention officers is required to ensure effective risk commensurate measures are put in place *1 *2

Footnotes

*1 Engagement is recommended with other Blue Light Services & key community stakeholders to understand the potential impact of the development on their service delivery – e.g. Suffolk Constabulary, Cambridgeshire Constabulary, Suffolk Fire & Rescue Service, Cambridgeshire Fire & Rescue Service & the East of England Ambulance Service NHS Trust (EEAST)

*2 Any necessary mitigation & management measures to be secured via a Development Consent Order (DCO) Requirements(s)

15. We trust this assists the EIA scoping process and look forward to working with the Applicant to satisfactorily address the points raised in NC's response.

ANNEX 1

Redmere Wind Farm – Scheme Description

Vattenfall Wind Power Ltd (the Applicant) has prepared an EIA Scoping Report in support of a request to the Planning Inspectorate for a Scoping Opinion under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

The report relates to the proposed construction, operation, maintenance and decommissioning of Redmere Wind Farm and its associated development (the Proposed Development).

The proposed development is located approximately 6.5 km north east of Ely and in the vicinity of Redmere, Feltwell and Lakenheath which fall within the administrative areas of East Cambridgeshire DC, West Suffolk Council and Kings Lynn & West Norfolk BC within the Counties of Cambridgeshire, Suffolk and Norfolk respectively.

The proposed development (in brief) is comprised of the following key components;

- An installed generating capacity of up to 303 MW;
- 2 x interconnected sites – referred to as Redmere North & Redmere South;
- 32 x wind turbines – each with a maximum hub height of 134 m, tip height of 220 m & rotor diameter of 172m;
- A Battery Energy Storage System (BESS) – with an installed capacity of 50 MW;
- An onsite substation;
- Associated infrastructure including a temporary meteorological mast (134 m in height);
- Access via the A1101;
- Turbine delivery necessitating Abnormal Indivisible Loads (AIL's) - anticipated port of origin (Great Yarmouth) & routing to site(s) via the A47, A11, A14, A10 & A1101;
- Other scheme components generating HGV & LGV movements;
- A range of construction phase requirements, including off-site highway works, borrow pits, construction compounds, haul roads, trenching to bury/ place electrical & communication cabling;

- Earth works & drainage works;
- Worker welfare facilities;
- A construction phase of 2 years, operating phase of 40 years & decommissioning phase of 2 years;

Norfolk County Council

Strategy and Transformation
County Hall
Martineau Lane
Norwich
NR1 2SG
NCC contact number: 0344 800 8020
Text relay no.: 18001 0344 800 8020

Via Email

Date: 29th October 2026

Dear Case Officer,

EIA Scoping Opinion: Redmere Wind Farm

Norfolk County Council (the County Council) welcomes the opportunity to provide comments on the above environmental impact assessment (EIA) scoping report. The comments below are made on a without prejudice basis and the County Council reserves the right to make further comments on the development consent order (DCO) application during consultation periods; and at the public examination stage.

The County Council have initial concerns they would expect to see addressed through the EIA:

Highways and construction traffic
Construction traffic impacts on Norfolk's rural highway network should be fully assessed, including abnormal loads, Public Rights of Way, emergency access and cumulative traffic effects.

Minerals and Waste
The assessment should recognise the Norfolk Minerals and Waste Local Plan and appropriately address waste management. Mineral resource and facility safeguarding can be scoped out.

Fire Safety
Further assessment is required of thermal runaway risks, emergency access, firefighting water and contaminated runoff, wildfire risk and emergency response arrangements.

Water Environment
Significant further assessment is required to address all sources of flood risk, site-specific conditions, drainage, ordinary watercourses and the effects of new impermeable surfaces.

Public Health
A dedicated Human Health chapter and Mental Wellbeing Impact Assessment should be included, with further consideration of landscape and visual effects, construction dust and vulnerable populations.

Historic Environment
Below-ground archaeology, geoarchaeology and paleoenvironmental effects should be scoped in, including potential effects on peat and waterlogged archaeological remains.

Cumulative Effects
A robust and coordinated assessment of cumulative effects with Chatteris Wind Farm is required, particularly for landscape and visual, ecological, ornithological and construction effects.

Aviation
Cumulative effects with Chatteris Wind Farm should be considered.

Ecology
The assessment should establish a robust ecological baseline and fully consider construction and operational effects, including impacts on birds, bats, designated sites and ecological connectivity, with appropriate mitigation, monitoring and buffers.

Landscape
Landscape and visual effects, in particular regard to openness, skyline character, settlement setting, tranquillity, recreational receptors, aviation lighting and cumulative effects need to be carefully considered.

The County Council's detailed comments on the EIA Scoping Report are provided at Appendix 1 to this letter and should be read alongside the summary above.

Yours faithfully,

Megan Sales
Strategic Planner NSIPs
Norfolk County Council

Appendix 1: Norfolk County Council Detailed Scoping Comments

1. Highways

1.1. The Environmental Impact Assessment (EIA) Scoping Report states that the precise alignment of the project and the locations of construction compounds are still under development. Accordingly, there is currently insufficient detail for the Local Highway Authority to undertake a full assessment of the project, and the comments below are therefore of a general nature.

1.2. Within Norfolk, the developer has identified works at Redmere North comprising 20 wind turbines. Although this has not been confirmed, the County Council would expect the following infrastructure to be located within Redmere North: an on-site substation compound, a Battery Energy Storage System (BESS), electrical infrastructure, cables and communications infrastructure, temporary construction compounds, and temporary access tracks.

1.3. The scoping report confirms that the formal DCO application will be accompanied by a Transport Assessment (TA) and an Outline Construction Traffic Management Plan (OCTMP). While the volume of construction traffic is not yet known, the commitment to provide both documents is noted. The TA should assess the effects of anticipated traffic on driver delay, severance, pedestrian delay, pedestrian amenity, accidents, road safety, and the impact of abnormal indivisible loads (AILs). It is also noted that traffic and transport effects during operation, including maintenance, are out of scope, and the Highway Authority is content with this approach.

1.4. More generally, the EIA scope focuses on increases in traffic volumes, represented as percentage changes. However, the Highway Authority wishes to highlight that the public highways serving the proposed infrastructure in Norfolk are predominantly narrow rural lanes. Consequently, even relatively small increases in traffic can have a significant impact where vehicles are unable to pass one another safely. This issue should therefore be considered within the CTMP. There are also Public Rights of Way (PRoW) within the red line boundary, and appropriate mitigation measures should be identified for these routes.

1.5. The Environmental Statement should also consider emergency access for blue light services in relation to any temporary road closures and/or temporary roadworks. Specific regard should be given to the proposed Fens Reservoir, which, if approved, will introduce additional infrastructure and cumulative traffic impacts in the vicinity of the site.

2. Minerals and Waste

2.1. The proposed development is for a wind farm and associated battery storage located on two parcels of land of approximately 2378ha, linked by an access corridor north and south of Shippea Hill Station. The northern parcel is north of the Little Ouse River and within the Borough Council of King's Lynn and West Norfolk administrative area and will cover approximately 1,180 hectares of land.

2.2. Therefore, this northern parcel is covered by the policies of the Norfolk Minerals and Waste Local Plan (NM&WLP) adopted 2025. However, the Scoping report does not mention the NM&WLP, nor the policies within it regarding mineral resource safeguarding; despite mentioning those policies within the Cambridge and Peterborough Minerals and Waste Local Plan in relation to the southern land parcel.

2.3. It is proposed that the wind farm will be subject to an application for a Development Consent Order as an NSIP and the Scoping report is based on the indicative Order Limits which include not only the wind turbine locations but also areas within which enabling infrastructure may be located.

2.4. A map has been included in figure 1 which shows the safeguarded mineral resources within the area covered by the indicative Order Limits.

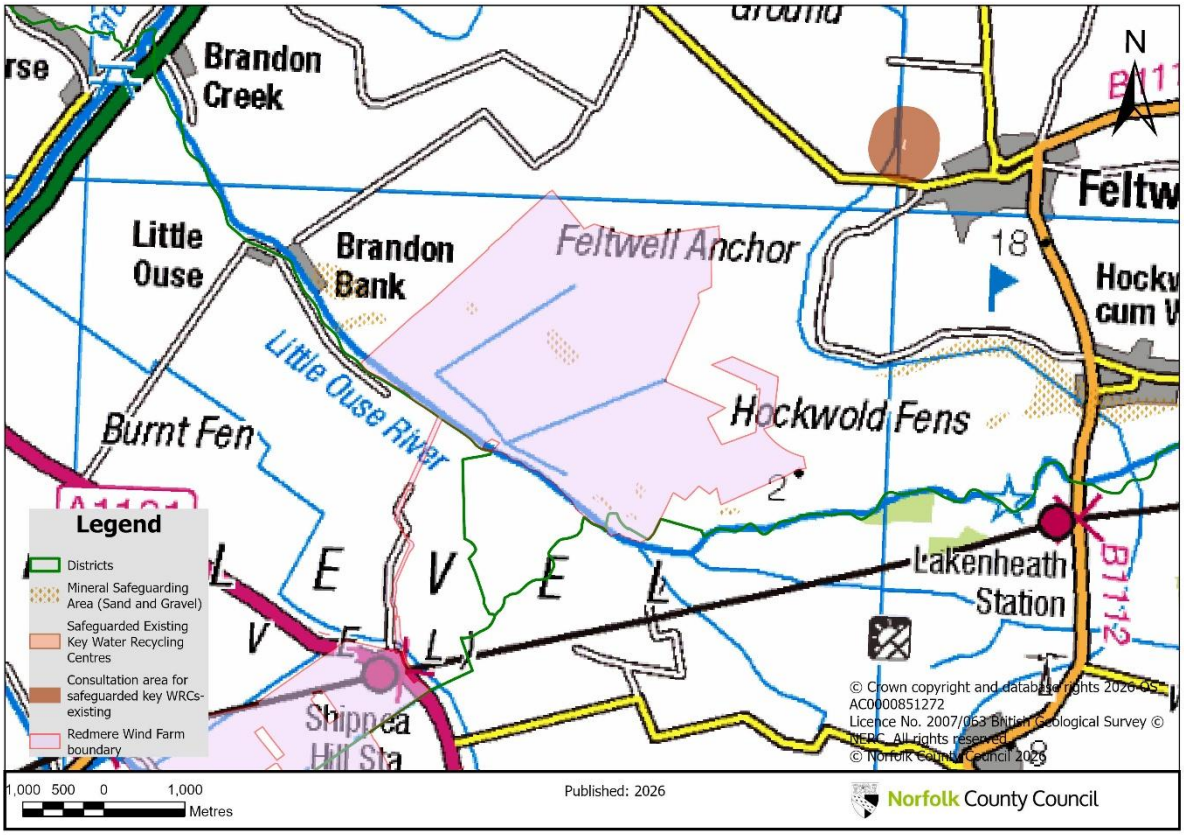

Figure 1. Safeguarded mineral resources within the indicative Order Limits

Minerals resource safeguarding

2.5. Despite the large area covered by the northern land parcel in the indicative order limits, the area underlain by safeguarded mineral resources is comparatively small and limited to the following areas:

- A small area (1.8 hectares) close to the north-western edge of the site
- Three small areas close to the southern edge totalling approximately 4.7 hectares, and;

- An area (9.5 ha) in the centre of the site; within the area surrounding Shrubhill Farm, some of which appears to have been the subject of small-scale historic extraction

2.6. The proposed development is designed with a suggested operational lifetime of 40 years, after which decommissioning would take place to remove the turbines and associated infrastructure. Given that there are only very limited areas of mineral resource within the northern land parcel, it is unlikely that this proposed development would permanently sterilise a significant amount of mineral resource within it. The details of the layout, location or construction methods of the associated infrastructure have not been finalised at this stage of the project. Therefore, it is not currently known to what extent this infrastructure would be located on the northern land parcel.

2.7. It is noted that the Scoping report at paragraphs 2.2.28-2.2.30 mentions the potential for onsite borrow pits to supply construction stone. Given the limited mineral resources available onsite within Norfolk, the Mineral Planning Authority is uncertain as to whether sufficient suitable material could be sourced within the northern land parcel.

2.8. Given the above information, the County Council does not consider that the proposed development would result in the needless sterilisation of safeguarded mineral resources, and although mineral resource safeguarding is not mentioned as a topic within the Scoping Report, mineral resource safeguarding issues can be scoped out of the assessment.

Minerals and Waste Facility Safeguarding

2.9. There are no safeguarded existing mineral or waste facilities within the draft Order Limits, nor does it coincide with any consultation areas surrounding such sites. The Scoping Report does not refer to mineral and waste facility safeguarding and the potential for impacts. However, it is the view of the County Council, in its capacity as the Mineral and Waste Planning Authority for Norfolk, that this topic can be scoped out of the assessment for the northern land parcel located within Norfolk.

Waste Management

2.10. The Scoping Report does refer to the management of waste arising from the construction, operation and decommissioning of the proposed development. The application should assess the potential for impacts on waste management facilities to deal with this waste, with particular reference to the sites within Norfolk and Cambridgeshire. This should be included within the outline Site Waste Management Plan (oSWMP) included in the application.

3. Fire Safety

3.1. Norfolk Fire and Rescue Service (NFRS) has reviewed the Environmental Impact Assessment Scoping Report and provides the following comments for consideration during preparation of the Environmental Statement and the continuing design of the development.

Battery Energy Storage System

3.2. The Scoping Report recognises that battery faults can result in fire or thermal runaway and proposes that these hazards will be managed through design controls and a Battery Safety Management Plan. NFRS considers that the Environmental Statement should provide sufficient detail to demonstrate that credible fire scenarios, their consequences and the proposed response arrangements have been fully considered.

- Appropriate separation distances between BESS units, transformers, substations, turbines, occupied buildings, site boundaries and combustible vegetation;
- Fire detection, continuous monitoring, isolation and emergency shutdown arrangements;
- Measures to prevent fire spread between battery containers and associated infrastructure;
- Arrangements for thermal runaway, toxic and flammable gases, prolonged cooling and possible re-ignition;
- Containment, testing and disposal arrangements for contaminated firefighting water;
- Safe firefighter approach positions, operational exclusion zones and emergency intervention procedures; and
- A site-specific emergency response plan for BESS and electrical infrastructure incidents.

Emergency Access

3.3. The site access strategy must demonstrate that an effective emergency response can be maintained during construction, operation and decommissioning. Access arrangements should be developed in consultation with NFRS and should provide:

- All-weather access suitable for fire and rescue service appliances;
- Adequate road widths, load-bearing capacity, gradients, gateways, turning areas and operating space;
- Safe access to the BESS, substations, transformers and individual turbine locations;
- Secure emergency access arrangements that do not delay attendance;
- Clear site signage, turbine and equipment identification, and grid or what3words references where appropriate; and
- Alternative access arrangements where reasonably practicable, particularly where flooding, smoke or the incident itself could make the principal entrance unavailable.

Firefighting Water and Contaminated Runoff

3.4. The Environmental Statement should demonstrate that suitable firefighting water supplies and firewater containment arrangements will be available for the final technology and site layout. The assessment should address:

- The location, capacity, flow rate and year-round reliability of proposed water supplies;
- Fire appliance access and suitable hardstanding at water supply points;
- Resilience during drought, freezing conditions, flooding, power loss or infrastructure failure;
- The expected duration and scale of water demand for credible BESS fire scenarios;
- Containment of contaminated runoff to prevent discharge to drainage ditches, groundwater, watercourses or environmentally sensitive receptors; and
- Arrangements for the recovery, testing and lawful disposal of contaminated firewater.

Wildfire and Vegetation Management

3.5. The Scoping Report identifies wildfire as a potential climate-related risk but proposes to scope wildfire effects out of the Major Accidents and Disasters assessment. NFRS requests that the Environmental Statement clearly reconciles this position and demonstrates how wildfire prevention, mitigation and response will be secured. A site-specific Wildfire and Vegetation Management Plan should include:

- Management of combustible vegetation around turbines, transformers, substations and BESS infrastructure;
- Appropriate fire-resistant separation zones or firebreaks;
- Controls to minimise ignition from electrical faults, hot works, vehicles and maintenance activities;
- Procedures for periods of very high or exceptional fire severity;
- Arrangements for liaison with neighbouring landowners and land managers; and
- Measures to prevent a fire within the site spreading to the surrounding landscape, and a landscape fire affecting critical site infrastructure.

Emergency Planning and Operational Information

3.6. NFRS requests early and continuing engagement before the fire strategy, Battery Safety Management Plan and emergency arrangements are finalised. Before commissioning, the operator should provide:

- A site-specific Emergency Response Plan developed in consultation with NFRS;
- Details of battery chemistry, maximum stored energy and relevant manufacturer emergency guidance;
- Hazard, safety and environmental information for the BESS and associated electrical infrastructure;
- Isolation, shutdown and emergency control procedures;
- Up-to-date site plans showing hazards, access routes, isolation points, water supplies, drainage and firewater containment arrangements;

- Named 24-hour emergency contacts and escalation arrangements;
- Opportunities for site familiarisation visits, operational pre-planning and proportionate multi-agency exercising; and
- A process for notifying NFRS of material changes to the technology, layout, stored energy or emergency arrangements.

3.7. NFRS requests continued consultation throughout detailed design, construction planning and preparation for operation. The Environmental Statement should provide a clear and auditable account of how BESS fire and thermal runaway, emergency access, firefighting water, contaminated firewater, wildfire and emergency planning have been assessed and how the necessary controls will be secured.

3.8. Subject to satisfactory resolution of these matters, NFRS raises no objection in principle at the EIA scoping stage.

4. **Water Environment**

4.1. The Lead Local Flood Authority (LLFA) have reviewed The Redmere Wind Farm Environmental Impact Assessment (EIA) Scoping Report Documents, dated September 2026 (Document Reference: 0824465) prepared by Vattenfall and wish to make the following comments.

Chapter 11- Hydrology, Hydrogeology, Geology and Peat

4.2. In section 11.3.1, the applicant identifies the Flood Map for Planning as the source of flood risk mapping. While the flood map for planning is used for planning purposes the datasets displayed are limited to one extent at a time. The Environment Agency also provides a long term flood map where all the flood extents and depths are also displayed, providing a better consideration of flood risk from surface water and from rivers and the sea. The LLFA recommend that all the flood risk extents and depth information is included in the review rather than relying on the limited dataset within the flood map for planning. Further work and information are required.

4.3. The LLFA notes section 11.3.2 on Topography does not identify any site specific datasets that are planned to be collected. Therefore, further information will be required to assess flood risk on the site. The LLFA also notes that the applicant has discussed flood risk in a non-relevant section of the Scoping report. Further work is required.

4.4. In section 11.3.3 to 11.3.14, the applicant has focused upon the desk top study information for the study area. However, there is no information about the intended ground investigations for this area in relation to this development. Further work is required.

4.5. The applicant in section 11.3.15 to 11.3.20 discusses the hydrology for the proposed development site. In section 11.3.18, the applicant makes some assumptions based on typical information and national level strategic desk top information. While this information is useful, this information is not site specific and there is no clear information provided to determine the connectivity in the

groundwaters with the watercourse networks within and surrounding the site. Further information is required.

4.6. In section 11.3.21 to 11.3.23, the LLFA notes the applicant has identified the main rivers in the vicinity of the proposed development. However, there has been no consideration or discussion of the ordinary watercourses within and adjacent to the boundaries of the site. On review of subsequent sections, the LLFA notes there should be other considerations for the watercourse networks or the water bodies frequently shown in the figures. There is no consideration of the collection of site specific data through site surveys (such as topographic survey, hydrological monitoring or ground water monitoring) prior to a "design freeze" as confirmed in section 11.3.39. This is not appropriate as the proposed initial design would not be based upon site specific information or relevant data. Further data and information collection is required prior to the preparation of a proposed design to ensure that site constraints are adequately considered from the outset.

4.7. The LLFA notes that in section 11.3.28, the applicant only identifies flood risk from one source; main rivers. This is an incomplete assessment and further consideration to other sources of flood risk should be provided, including surface water, groundwater, ordinary watercourses, reservoirs. On review of the figure 1 Only Flood Zone 2 and 3 were displayed for main rivers, no surface water or other sources of flood risk were shown. Further work is required.

4.8. The LLFA notes the applicant has not considered the various water management authorities involved in managing flood risk in this area, that includes the LLFA, the Environment Agency and various Internal Drainage Boards as well as the Highway Authority. At present, it is not clear where the site is located in relation to the Internal Drainage Board (IDB) areas of jurisdiction and whether suitable consultation with the IDBs, the Environment Agency and the LLFA. Further work is required.

4.9. In Table 11.1, the applicant has listed one receptor as flood risk and tried to consider surface water flood risk. However, the information provided in each of the columns is inconsistent and variable with the definition of the receptor and the Potential Impact Pathway. For example, the generic statement of "flood risk" with the impact pathway identifying surface water flood risk onsite and upstream or downstream of construction areas suggests that only construction is considered rather than decommissioning too. In addition, only one source of flood risk is considered. Furthermore, the LLFA notes in the additional information section, the applicant identifies that the site is located in Flood Zone 3. While in the mitigation section, the applicant proposes to use SuDS, however this may not be viable as an approach as the National Standards for SuDS, in section 3.13 clearly states "Surface water drainage features shall not be located in areas identified at risk of flooding in the 1% AEP event from pluvial or fluvial sources unless designed to be and demonstrated to operate under flood conditions." This whole section is inconsistent, inappropriately considered and potentially mitigated with an unviable solution. The LLFA agrees that surface water flood risk should be scoped in. Further work is required.

4.10. Also, in relation to Table 11.1, the LLFA notes that regarding the watercourses section, there is no consideration of watercourse consenting and that alterations to the flow that could result in the blockages of the watercourse. Furthermore, these watercourses are in an IDB area and there are a number of IDB consents and requirements that will need to be considered in the proposed design. There are similar concerns in the operation phase of the development in Table 11.2. Further work is required.

4.11. In Table 11.1 the LLFA notes that the applicant has identified SuDS as a mitigation solution to a number of potential issues but there has been no consideration on the environmental constraints that could limit the design of SuDS. For example, the prevalent high ground levels may considerably limit the depth and design of SuDS features to manage the various risks identified. However, this could result in additional space being necessary for the SuDS systems if they are possible to facilitate. Further work is required. In relation to Table 11.2, based on the receptor and impact pathway description is not clear at this stage how drainage and SuDS could be used to mitigate the effect on public water supply. This is unclear and potentially unrelated to the impact that has been identified. Further work is required.

4.12. The LLFA notes the understated potential for surface water runoff associated with the increase in the impermeable areas in Table 11.2 and confirms that all increases in impermeable areas will require surface water management to prevent an increase in flood risk from surface water runoff. As previously identified, there may be further limitations to the proposed mitigation due to local site specific constraints, such as existing areas of the site being within the !% AEP flood extents. Further work and assessment is required.

4.13. In section 11.5.1 the applicant indicates the consideration of all sources of flood risk, however, at present, the scoping report has only had limited consideration of two sources of flood risk and only identified the flood extents associated with fluvial flood risk. This is not a suitable level of assessment and a significant amount of work is yet to be undertaken to consider the flood risk to this proposed development adequately. This is not adequately identified in the limitation and assumptions section of the scoping report. Further work is required.

Chapter 2- Project Description

4.14. The LLFA points out that drainage ditches are watercourses as per the legal definition. The LLFA notes the inclusion of BESS, substation and other associated infrastructure. The applicant has indicated the location of the 32 wind turbines in Figure 2.2 but they are unable to indicate the potential location of the BESS, onsite substation and access tracks. It is also not clear from the plan where the proposed development will connect to the grid. However, the applicant is able to confirm that borrow pits would likely be constructed. Further information is required.

4.15. The BESS is assumed to be 180m by 100m (approximately 1.8 hectares) however the applicant is unable to indicate how many BESS units this area

would house or where. However, in relation to the wind turbines, the applicant is able to offer grid reference locations for each of the proposed turbines. This is an inconsistency in the amount of available detail available at this stage. The applicant has identified almost a 2 hectare area of impermeable surface that they have not committed to providing sustainable drainage for or to manage the increase in surface water flood risk associated with this aspect of the development. In contrast the applicant has indicated that the increase in surface water runoff would be managed from the substation. Further information and commitment is required.

4.16. The LLFA notes that in section 2.2.18 the applicant identifies welfare facilities. This is likely to result in the generation of foul water. Further details resulting in the management of these flows and waste is required.

4.17. The LLFA notes that in section 2.2.26 the applicant identifies significant areas of impermeable surfacing where a surface water drainage system is not committed to. This would result in an increase in surface water flood risk and would need to be addressed in a sustainable manner in the construction stage. Further work is required.

4.18. In section 2.3, the applicant identifies that Burwell Main electricity station will be the point of connection. This needs to be marked on the application figures as at present it is not possible to identify within the scoping information. The applicant acknowledges in section 2.3.8 that they have not yet identified a route for connection. The connection route should be identified and within the order limits, otherwise the DCO will need a separate permission to connect the proposed development to the national grid. Further work is required.

4.19. We strongly recommend that any EIA includes, or any planning application for development is accompanied by an FRA and a surface water drainage strategy to address:

- All sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development.
- How surface water drainage from the development will be managed on-site and show compliance with both NPPF and EN-1 by ensuring that Sustainable Drainage Systems (SuDS) are put in place.
- How any phasing of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development.

4.20. This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (NPPF) and the subsequent EN-1 and EN-5.

4.21. This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (NPPF) and the subsequent EN-1 and EN-5.

4.22. In this particular case this would include appropriate information on:

- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including "National standards for sustainable drainage systems (SuDS)" July 2025 by Department for Environment, Food and Rural Affairs.
- Appropriate assessment and mitigation of all sources of surface water flooding onsite/originating from offsite that may affect the development, in addition to risk of groundwater flooding.
- Provision of surface water modelling of overland flow routes and mitigation provided to show how flood risk will not be increased elsewhere. This may include temporary culverts sized for the 1% Annual Exceedance Probability (AEP) plus climate change allowance.
- At least one feasible proposal for the disposal of surface water drainage should be demonstrated and in many cases supported by the inclusion of appropriate information. It is important that the SuDS principles and hierarchies have been followed in terms of:
    - surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration (generally greater than 2m below ground level).
    - the SuDS components used within the management train (source, site and regional control) in relation to water quality and quantity.
    - identifying multifunctional benefits including amenity and biodiversity.
    - Onsite, infiltration testing, in accordance with BRE365 or equivalent should be undertaken to find out if infiltration is viable across the site and at the depth and location of any infiltration drainage feature. Infiltration testing should be undertaken 3 times in quick succession at each location.
- A surface water drainage system must be provided for the construction, operation and decommissioning of the project, including any temporary construction works.
- The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.

4.23. Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse, then the applicant is likely to need the approval of the County Council. In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be

granted except as a means of access. It should be noted that this approval is separate from planning.

5. **Public Health**

5.1. It is noted that approximately half of the proposed development lies outside Norfolk. However, the northern section falls within Norfolk, specifically within the district of King's Lynn and West Norfolk. This Norfolk-based element is located within the Southery, Feltwell and Hockwold Middle Level Super Output Area (MSOA), which, according to Norfolk Local Insight, contains 3,591 households that could be affected by the proposed development.

5.2. We have outlined below the information that the County Council considers should be included within the Environmental Statement (ES).

Section 17.1 Human Health

5.3. The inclusion of a comprehensive Human Health chapter within the Environmental Statement would help ensure that potential health and wellbeing impacts are appropriately assessed, health inequalities are considered, and opportunities to support healthier communities are identified and maximised throughout all phases of the development.

5.4. The Scoping Report states that:

"As these assessments collectively address the principal determinants of health, and no significant health effects are anticipated beyond those already captured within the proposed scope of assessment, a standalone Human Health chapter is not considered necessary or proportionate and is scoped out of the ES."

5.5. Given the potential effects of the development on mental wellbeing, particularly through changes to landscape character and noise exposure (see later sections of this response), the County Council considers that the inclusion of a dedicated Human Health chapter would be proportionate and justified. In particular, the completion of a Mental Wellbeing Impact Assessment (MWIA) would provide a structured approach to identifying potential impacts on mental health and opportunities for mitigation and enhancement.

Section 17.2 Air Quality

5.6. Regarding Section 17.2 (Air Quality), it is noted that impacts from dust and particulate matter generated through earthworks, construction activities, vehicle movements, and the handling or storage of materials on local human health and ecological receptors are proposed to be scoped out.

5.7. While the report states that construction dust emissions would be temporary, localised in nature, and controllable through standard mitigation measures secured through the Construction Environmental Management Plan (CEMP), the County Council considers that further consideration should be given to potential impacts on vulnerable populations.

5.8. In 2024, according to data from the Department of Health and Social Care, the district of King's Lynn and West Norfolk had an estimated fraction of mortality attributable to particulate air pollution of 5.2%. Construction activities have the potential to temporarily increase local particulate concentrations if not effectively managed. Furthermore, Norfolk Local Insight demographic data shows that 22.3% of residents within the Southery, Feltwell and Hockwold MSOA are aged 65 and over, compared with an England average of 18.8%.

5.9. Older adults are disproportionately affected by exposure to particulate air pollution, with increases in particulate matter associated with higher rates of cardiovascular disease, stroke and hospital admissions. Given the demographic profile of the area, the County Council considers that air quality impacts on local residents should be assessed within the Environmental Statement.

Section 14 Noise and Vibration

5.10. With regard to Section 14 (Noise and Vibration), reducing environmental noise exposure can positively influence quality of life, particularly in relation to sleep quality and mental wellbeing.

5.11. The County Council supports the decision to scope in noise arising from construction and decommissioning activities, alongside the implementation of a Construction Noise and Vibration Management Plan. Such measures are anticipated to include the application of Best Practicable Means (BPM), appropriate plant selection, maintenance of equipment, acoustic screening where practicable, and controls over hours of operation.

5.12. In relation to operational noise, it is noted that potential impacts arising from the Battery Energy Storage System (BESS), substation, transformers, inverters, cooling equipment, ancillary infrastructure and wind turbines will be assessed using BS 4142 Initial Assessment methodologies and Total Noise Assessment Criteria (TNAC). The County Council welcomes the inclusion of these assessments and would expect any significant residual impacts on local communities to be clearly identified and mitigated.

Section 9 Landscape and Visual

5.13. The County Council considers that changes to landscape character and visual amenity have the potential to affect mental wellbeing and should therefore be considered within the Environmental Statement.

5.14. Given the expansive and relatively flat landscape character of the Fens, the proposed turbine height of 220m is likely to increase the visibility of the development from nearby residential properties and communities. We note that a Residential Visual Amenity Assessment (RVAA) will be undertaken to assess effects on nearby private properties and that the Landscape and Visual Impact Assessment (LVIA) will consider potential visual effects on settlements within the turbine Zone of Theoretical Visibility.

5.15. However, there appears to be no explicit consideration of mental health and wellbeing within Table 9.4, Landscape and Visual Scoping Determination of Potential Likely Significant Effects During Operation.

5.16. The County Council considers that mental health and wellbeing should be scoped in as a receptor. This should include, as a minimum, residents living within 2km of the proposed turbine locations, alongside wider communities for whom significant landscape and visual effects may arise. This is especially relevant given that the developer has identified the potential for significant impacts.

5.17. Consideration of mental wellbeing is particularly important in this location, where the Southery, Feltwell and Hockwold MSOA experiences higher levels of deprivation than the national average, according to Norfolk Local Insight. This may increase vulnerability to adverse mental health outcomes and highlights the importance of understanding how any significant landscape and visual effects may be experienced by local communities. Evidence indicates that people living in the most deprived communities are significantly more likely to experience common mental health disorders than those living in the least deprived areas (Mental Health Foundation).

5.18. The County Council therefore recommends that mental health impacts are explicitly assessed within this section and that mitigation measures include the completion of a comprehensive Mental Wellbeing Impact Assessment (MWIA).

5.19. Furthermore, in line with the principle of parity of esteem (enshrined in the Health and Social Care Act 2012), which recognises that mental health should be afforded equal importance to physical health, the County Council requests that the Planning Inspectorate directs the Applicant to include Mental Health and Wellbeing as a distinct receptor within a dedicated Human Health chapter and scope this topic into the Environmental Statement.

5.20. In summary, the County Council is content with the inclusion of the proposed Noise and Vibration assessments.

5.21. However, the County Council consider that the Environmental Statement should also include a dedicated Human Health chapter, incorporating a Mental Wellbeing Impact Assessment (MWIA) and assessing the potential health impacts of landscape and visual change, noise and vibration, and construction-phase dust and particulate matter. Particular consideration should be given to vulnerable populations and existing health inequalities.

5.22. Furthermore, Mental Health and Wellbeing should be assessed as a specific receptor within the Landscape and Visual assessment.

5.23. The County Council also recommend that construction-phase dust and particulate matter are scoped into the Environmental Statement rather than scoped out, given the potential impacts on human health.

6. **Historic Environment**

6.1. In relation to below-ground archaeology we concur with the overall conclusions of the scoping report, below-ground archaeology needs to be scoped in.

6.2. The proposed archaeological desk-based should include an aerial imagery (aerial photographs and LIDAR) analysis carried out by recognised specialist.

6.3. A lot of the content of the scoping report and appendices seems quite generic, it is concerning that the scoping report and associated documents fail to locate the proposed scheme within the unique geological/hydrogeological context of the peat fens.

6.4. A geoarchaeological and paleoenvironmental desk-based assessment carried out by a recognised specialist is required. We regard the peat deposits of Norfolk as undesignated heritage assets in their own right due to their potential paleoenvironmental significance.

6.5. Scoping Report 8.3.10 – Pre-determination are archaeological evaluation employing a range of techniques will be required. Specialist advice should be sought in relation to appropriate geophysical survey techniques to be deployed. 'Standard' magnetometer/gradiometer survey is not always suitable as the sole technique to be deployed on some fenland soils and geologies. For reasons outlined below it is highly likely that pre-determination archaeological evaluation by trial trenching will be required.

6.6. We would welcome early engagement with the applicant archaeological and geoarchaeological advisors. There are some data sets within the Norfolk Historic Environment Record that need careful consideration.

6.7. Table 8.1 Micro-siting is only a valid mitigation technique if the archaeological/geoarchaeological/paleoenvironmental resource within the application area has been adequately understood. This might include deeply buried archaeological deposits/structures/artefacts in addition to surface archaeology.

6.8. During the operational life of the scheme impacts on the preservation of waterlogged organic remains, including peats through alteration to the hydrogeology of the application area and its surroundings needs to be scoped in.

6.9. At present there is not enough information to indicate that decommissioning of the scheme will not have impacts beyond those of construction and operation. Impacts of decommissioning need to be scoped in.

7. **Cumulative Effects**

7.1. The County Council welcomes the identification of Chatteris 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.

7.2. 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.

7.3. 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.

8. Aviation

8.1. 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.

9. Ecology

9.1. The ecology, biodiversity and arboriculture assessment should establish a robust baseline and consider the potential effects of the development during both construction and operation. The assessment approach should be proportionate to the nature and scale of the proposals, while ensuring that the survey design is sufficiently comprehensive to inform detailed design, mitigation and future monitoring requirements.

9.2. Key considerations should include:

- Ecological baseline and survey design – surveys should provide an appropriate understanding of habitats, protected and notable species, designated sites and ecological connectivity across the site and relevant surrounding area. The survey programme should be designed not only to inform the impact assessment but, where appropriate, to provide a repeatable baseline against which operational monitoring can subsequently be undertaken.

- Designated sites and potential changes to the National Site Network – consideration should include potential SPA extensions and additional qualifying species or bird assemblages arising from the Third UK SPA Network Review (Phase 2), published in May 2025. Early engagement should inform survey scope, alone and in combination with other plans and projects. Habitats Regulations Assessment implications should also be addressed.

- Operational effects – consideration should extend beyond construction impacts to the potential for effects throughout operation. This should include disturbance, displacement, fragmentation and changes to ecological connectivity, together with indirect effects associated with lighting, noise, activity, access and maintenance.

- Bird collision and displacement risk – the construction and operation of wind turbines represents an aerial collision risk, the assessment should consider potential collision and displacement effects on birds. Survey effort should be capable of identifying important flight activity, regularly used movement corridors and areas of particular importance for sensitive species, where relevant to the nature of the proposals.

- Bat collision and operational risk – the assessment should consider operational collision impact, injury or displacement risks for bats. Bat activity surveys should consider the distribution and intensity of activity, species or species groups present, commuting and foraging routes and the relationship between bat activity and landscape features such as hedgerows, tree lines and watercourses.

- Buffers and stand-off distances – appropriate ecological buffers should be considered around sensitive habitats and features, including designated sites, ancient or important woodland, trees, hedgerows, watercourses, ponds, roosting features and other important habitat corridors. Buffer requirements should be informed by the sensitivity and function of the feature rather than relying solely on standard distances, and should take account of both construction and operational effects.

- Arboriculture – arboricultural assessment should identify trees, groups, woodland and hedgerows that may constrain or influence the development layout. Particular consideration should be given to veteran and ancient trees, root protection areas and the potential for direct and indirect effects arising from construction, access, utilities and operational activities. Opportunities to retain trees and integrate them with ecological buffers and green infrastructure should be explored through design.

- Biodiversity and connectivity – the assessment should consider effects on the wider ecological network as well as individual habitats and species. The layout should seek to retain and strengthen important habitat corridors and avoid creating barriers between feeding, breeding, roosting and resting habitats. Biodiversity enhancement and, where applicable, Biodiversity Net Gain should be integrated with the mitigation strategy rather than considered separately at a later stage.

- Future monitoring – baseline surveys should, where practicable, use methods and survey locations that can be replicated after construction. This is particularly important where there are potential operational collision, displacement or behavioural effects. Monitoring should be capable of testing the assumptions made within the impact assessment and determining whether mitigation is functioning as intended.

- Adaptive mitigation – where operational effects cannot be fully predicted at the assessment stage, consideration should be given to an adaptive management approach. This should establish appropriate monitoring triggers and identify the types of additional mitigation or management response that could be implemented if monitoring demonstrates effects greater than those predicted.

10. Landscape

10.1. The proposed turbines would be amongst the tallest onshore wind turbines currently proposed in England and would introduce substantial new vertical elements into predominantly open rural landscapes.

10.2. The County Council recognises the national importance of renewable energy generation and the strong policy support afforded to onshore wind development through national planning policy. However, the principal issue is not whether landscape and visual effects would occur; effects of that nature are inevitable for a wind farm of this scale. Rather, the key question is whether the receiving landscape has been appropriately valued, whether the degree of change has been fully recognised, whether significance conclusions logically follow from the baseline evidence and whether the proposed mitigation and management measures are capable of delivering the reductions in effects that are assumed.

10.3. The County Council's principal concerns relate to:

- The assessment of landscape value, susceptibility and sensitivity;
- Landscape and visual effects on openness, skyline character and expansive views;
- Impacts on the setting and identity of villages and rural settlements;
- Effects on recreational users and promoted routes;
- Impacts on tranquillity, dark skies and other perceptual qualities;
- Aviation lighting;
- Cumulative effects with other energy infrastructure projects;
- The transparency of professional judgement applied within the LVIA; and
- The certainty, timing and effectiveness of proposed mitigation measures.

10.4. Whilst the County Council broadly agrees with the initial baseline landscape evidence identified within the scoping, it considers that further scrutiny should

be paid to the relationship between baseline evidence, sensitivity assessments and the significance conclusions ultimately reached through the EIA process.

Policy

10.5. At a strategic level, the NPS EN-1 (Paragraph 5.10.5) recognise that ***"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape…".*** However, national policy is equally clear that applicants should apply the mitigation hierarchy and demonstrate that adverse effects have been avoided, reduced and mitigated wherever reasonably practicable.

10.6. Paragraph 5.10.6 of NPS EN-1 requires projects to be carefully designed with the aim of minimising harm to landscape character and visual amenity whilst securing appropriate mitigation where necessary. NPS EN-1 further recognises that major infrastructure projects may deliver wider environmental gains in addition to mitigating adverse effects. These may include landscape enhancement, improvements to green infrastructure, increased access to natural greenspace and the enhancement, expansion and provision of woodlands and other habitats.

10.7. The Proposed Development is not located within a nationally designated landscape, however, Paragraph 5.10.12 of NPS EN-1 makes clear that ***"Outside nationally designated areas, there are landscapes that may be highly valued locally".*** The County Council therefore considers that the absence of statutory designation should not diminish consideration of landscape value. Consistent with the principles set out within Landscape Institute Technical Guidance Note (TGN) 02/21: Assessing Landscape Value Outside National Designations, landscape value may arise from a range of factors including: natural heritage; cultural heritage; landscape condition; associations; distinctiveness; recreational value; perceptual (scenic) value; perceptual (wildness and tranquillity) value; and functional value.

10.8. The County Council notes that many of these characteristics are identified within both the Applicant's baseline evidence and the wider published landscape character evidence for Norfolk and Suffolk. In particular, recurring references are made to openness, expansive views, tranquillity, strong rural character, settlement setting, recreational use and distinctive landscape patterns. It is therefore considered that these attributes should be clearly reflected in subsequent assessments of landscape value, susceptibility, sensitivity and significance of effect. The County Council also notes that these characteristics are recurring themes throughout the published landscape evidence relevant to the receiving landscape and should therefore be afforded appropriate weight within the assessment.

10.9. The County Council has also had regard to:

- The National Planning Policy Framework;
- Planning Practice Guidance (PPG);

- The Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) 2013;
- LITGN-2024-01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)
- TGN 02/21 Assessing Landscape Value Outside National Designations;
- The Norfolk Local Nature Recovery Strategy;
- The Greater Norwich Green Infrastructure Strategy;
- Published National Character Area profiles; and
- Local Landscape Character Assessments prepared by Norfolk and Suffolk authorities.

10.10. Taken together, this evidence establishes a consistent expectation that significant infrastructure proposals should seek not only to minimise adverse landscape and visual effects but also to contribute meaningfully towards wider environmental enhancement, landscape resilience, green infrastructure connectivity, biodiversity enhancement and nature recovery.

Impacts

10.11. The Proposed Development is situated within a landscape that is heavily characterised by extensive agricultural land, open horizons, broad skies, fenland landscapes, tributary river valleys, dispersed settlement patterns and an extensive network of Public Rights of Way (PRoW) and recreational routes.

10.12. Published landscape evidence consistently identifies openness, expansive views, visual connectivity, tranquillity and strong rural character as defining characteristics of the receiving landscape.

10.13. The Sedge Fen Landscape Character Area (LCA) is identified as a ***"vast open landscape, with huge skies and panoramic views"*** which is a defining characteristic of the landscape and notes that expansive skyscapes, long-distance views and a strong sense of remoteness contribute significantly to local landscape character. Similarly, the Elveden Estate Sandlands LCA is identified as containing ***"sweeping views and a huge expansive scale"*** and notes that the scale of the landscape contributes to a strong sense of openness and exposure. These characteristics are not merely visual attributes but fundamental components of landscape character and the sense of place.

10.14. The Lower Little Ouse Valley LCA is noted as being a ***"quiet, rural character"*** and a deeply rural landscape experience, whilst the wider Breckland Landscape and Settlement Character Assessment and West Suffolk Landscape Character Assessment repeatedly identify open farmland, broad

skylines, dark skies, strong rural identity and extensive relationships between settlements and the surrounding countryside as defining characteristics of the area.

10.15. Many of these qualities are also recognised within the relevant National Character Area (NCA) profiles. The Fens NCA identifies ***"large open panoramas and enormous skies"*** as defining characteristics and recognises openness, remoteness, and exposure as integral to landscape character. The profile further notes that such characteristics may be vulnerable to visually prominent energy infrastructure and other large-scale development.

10.16. The County Council considers that these characteristics are particularly relevant to the assessment of a development comprising turbines of up to 220m in blade tip height. Unlike many other forms of development, wind turbines interact directly with skyline character, openness, visual scale, settlement setting and long-distance views and therefore have the potential to influence landscape experience over an extensive geographic area.

10.17. Notwithstanding, the County Council broadly agrees with the baseline descriptions presented within the scoping material. However, it considers that these characteristics should form a integral component of subsequent judgements regarding landscape value, susceptibility, sensitivity and significance.

Landscape Sensitivity and Susceptibility

10.18. The Applicant proposes to derive landscape sensitivity through consideration of both landscape value and susceptibility to change. The County Council recognises that this approach accords with the principles set out within GLVIA3.

10.19. Paragraph 5.40 of GLVIA3 explains that susceptibility concerns the ability of a landscape receptor to accommodate a particular type of development without undue consequences for the maintenance of existing landscape character. Consequently, the relationship between the proposed development and the defining characteristics of the receiving landscape is central to the assessment of sensitivity.

10.20. The County Council notes that the baseline assessment identifies a number of characteristics generally associated with increased susceptibility to large-scale wind energy development, including:

- Openness and expansive views;
- Skyline prominence;
- Visual connectivity;
- Tranquillity and dark skies;
- Remoteness;

- Recreational value;
- Strong rural character; and
- Distinctive settlement-landscape relationships.

10.21. These factors are acknowledged throughout both the NCA profiles and local Landscape Character Assessments. Against the baseline, the County Council considers it important that the assessment clearly demonstrates how landscape characteristics influence final susceptibility conclusions.

10.22. The County Councils concern is not that all affected landscapes should necessarily be assessed as highly sensitive, but that where baseline evidence identifies characteristics commonly associated with increased susceptibility to tall vertical development, it is important that the exercise of professional judgement is transparent and clearly explained.

10.23. Where landscapes are identified as possessing characteristics associated with increased susceptibility but are subsequently assessed as being of only moderate sensitivity, the County Council would expect a clear rationale of how professional judgement has been exercised and where competing factors have been balanced. This is particularly relevant where openness, long-distance views, settlement setting, skyline character and tranquillity are identified as key defining characteristics of the receiving landscape.

10.24. This is considered to be especially important given the proposed turbine height which would become prominent features within the landscape and have the potential to influence not only visibility, but also openness, skyline character, landscape scale, settlement setting and perceptions of tranquillity. Clear justification should therefore be provided where professional judgement moderates sensitivity conclusions that might not otherwise appear to follow directly from the baseline evidence.

Landscape Value

10.25. The County Council also considers that landscape value warrants careful scrutiny.

10.26. GLVIA3 and the Landscape Institute TGN 02/21 make clear that landscape value is not dependent upon statutory designation and may arise from a broad range of natural, cultural, perceptual and experiential characteristics.

10.27. The County Council notes that many of the examples of indicators of landscape value (see Table 1 of TGN 02/21) are physically present and repeatedly identified within both the Applicant's baseline evidence and the wider published landscape evidence.

10.28. There is an overarching concern that landscape value should not become overly influenced by the absence of national or local landscape designation. It is not that undesignated landscapes should be treated as designated landscapes. Rather, it is that these landscapes may derive their value from

the experiential, perceptual, recreational and cultural qualities which are not captured through statutory designation alone.

10.29. The Sedge Fen LCA, for example, identifies huge skies, panoramic views and a strong sense of remoteness as defining characteristics. The Lower Little Ouse Valley LCA identifies a deeply rural landscape experience, whilst the wider Breckland evidence repeatedly emphasises rural identity, settlement setting, countryside character and dark skies as important contributors to landscape character and local distinctiveness. These are qualities capable of contributing significantly to landscape value irrespective of designation status.

10.30. The County Council therefore considers that the ES LVIA should clearly demonstrate how these factors have informed assessments of landscape value and how they have subsequently influenced overall sensitivity conclusions.

10.31. There is a further concern that where experiential, perceptual and recreational qualities are acknowledged in the baseline but are less clearly reflected / described within the subsequent value assessments, there is a risk that landscape value is understated. Where landscape value is understated, there is a consequential risk that sensitivity and ultimately significance of effect may similarly be understated.

Assessment of Magnitude and Significance of Effect

10.32. The County Council recognises that significance of effect is not derived through a purely formulaic process but requires the application of informed professional judgement.

10.33. GLVIA3 also emphasises that such judgements should be transparent, proportionate and clearly linked to the baseline evidence presented. The County Council therefore considers that particular scrutiny should be applied where:

- Substantial landscape change is identified;
- Extensive turbine visibility is predicted;
- Settlement setting is affected;
- Recreational users experience prolonged exposure;
- Effects occur within landscapes characterised by openness, expansive horizons and broad skylines; or
- Reductions in significance rely heavily upon future mitigation.

10.34. This is particularly important because wind turbines differ fundamentally from many other forms of development. Whilst ancillary infrastructure may often be screened or assimilated over time, turbine visibility typically remains a defining characteristic of the operational development.

10.35. Furthermore, the movement of turbine blades, their vertical scale and their interaction with skylines mean that effects are not solely a consequence of visibility but also arise through changes to landscape character, landscape scale, visual balance and wider landscape experience.

10.36. The County Council therefore considers that where significance conclusions are moderated through assumptions regarding future mitigation, landscape integration or adaptation over time, the basis for those conclusions should be clearly narrated, explained and robustly evidenced. This is particularly relevant where significant reductions in effects are predicted despite limited change to the scale, prominence or visibility of the turbines themselves.

Landscape Effects

10.37. The Proposed Development would introduce up to 32 turbines of substantial scale into landscapes characterised by generally low-lying topography, expansive views, open skies and extensive skylines.

10.38. The County Council considers that the principal landscape effects are likely to arise from:

- Alteration of skyline character;
- Introduction of large-scale moving structures into open rural landscapes;
- Effects on perceptions of tranquillity and remoteness;
- Changes to landscape pattern;
- Effects on landscape scale and proportion;
- Cumulative interactions between turbines;
- Effects on settlement setting; and
- Changes to wider countryside character.

10.39. Whilst the turbines themselves occupy a relatively small physical footprint on the ground, their influence on landscape character extends considerably beyond that footprint.

10.40. This is particularly relevant in landscapes where openness, expansive views, broad horizons and visual connectivity form key defining components of local character.

10.41. The County Council therefore considers that the ES LVIA should clearly distinguish between, but not limited to:

- Localised physical effects;

- Wider effects on landscape character;
- Effects on settlement setting; and
- Broader perceptual and experiential effects.

10.42. This distinction is important because the consequences of turbine development may extend well beyond the immediate footprint of the proposed development and may influence the way landscapes are experienced by residents, visitors and recreational users across a much wider area.

10.43. It is also considered that effects on openness / exposure, skyline character, tranquillity (and dark skies) and landscape scale should be recognised as important landscape effects in their own right rather than simply consequences of turbine visibility. There are a number of recurring themes throughout the published evidence base and these all form an important component of the value, character and experience of the receiving landscape.

Effects on the Setting of Settlements

10.44. The County Council considers that effects on settlement setting are likely to represent one of the most important local considerations associated with the proposed development.

10.45. It is noted that published landscape and settlement character evidence consistently identifies the contribution that surrounding agricultural landscapes, landscape gaps, rural roads, open views and undeveloped skylines make to the identity and character of settlements throughout the wider study area. Many settlements derive an important component of their character from the relationship between built form and the surrounding countryside.

10.46. The County Council therefore considers that effects on settlement setting should be assessed as a distinct component of the LVIA rather than being inferred solely through effects on individual residential receptors.

10.47. This is an important distinction because effects on settlement setting may arise even where significant visual effects are not identified at individual properties.

10.48. It is expected that the assessment would consider:

- The experience of approaching and leaving settlements;
- Relationships between settlements and surrounding countryside;
- Settlement separation;
- Changes in perceived rurality;
- Effects on local distinctiveness;

- Effects on settlement skylines; and
- The contribution of surrounding landscapes to settlement identity.

10.49. Particular consideration should be given to those settlements whose identity is strongly influenced by open agricultural landscapes, expansive views and undeveloped rural surroundings.

10.50. The County Council considers that the introduction of turbines of up to 220m in height has the potential to alter the wider landscape context within which settlements are experienced. This may influence perceptions of scale, openness, rural character and visual containment even where direct visual effects on individual properties are not identified as significant.

10.51. Therefore, it is considered that effects on settlement setting should be clearly articulated and distinguished from residential visual amenity effects.

Substations, BESS and Associated Infrastructure

10.52. Whilst the turbines represent the principal source of landscape and visual change, the County Council notes that associated infrastructure including substations, electrical compounds, BESS infrastructure, security fencing, lighting, access tracks and ancillary plant may also give rise to significant localised effects.

10.53. These elements introduce a distinctly engineered and industrial character into landscapes that are currently predominantly agricultural in nature.

10.54. It is noted that the nature of these effects differs from turbine effects and whilst turbine impacts may be experienced across a broad geographic area, effects associated with substations and other built infrastructure are more likely to influence more intimate and local landscape character, settlement setting and visual amenity in the immediate vicinity of the development.

10.55. The County Council therefore considers that the assessment should clearly distinguish between:

- Turbine-related effects;
- Substation effects;
- BESS effects;
- Construction and decommissioning effects; and
- Combined effects arising from the overall development.

10.56. This distinction is important because different components may generate different types of effects and will inevitably require different mitigation responses to those specific effects.

10.57. Furthermore, whilst planting may contribute to the assimilation of some ancillary infrastructure over time, such measures are generally less capable of reducing turbine visibility and prominence. The effectiveness and limitations of mitigation should therefore be clearly articulated.

Alternative Turbine Configurations

10.58. The County Council notes that flexibility remains within the proposed design envelope and that detailed turbine specifications may evolve as the project progresses.

10.59. It is therefore essential for the ES to demonstrate that the reasonable worst-case landscape and visual effects associated with the proposed parameters have been fully assessed.

10.60. This is particularly important in relation to:

- Turbine height;
- Rotor diameter;
- Blade sweep;
- Turbine spacing;
- Substation design;
- BESS infrastructure; and
- Associated lighting requirements.

10.61. Given the relationship between turbine scale and visual prominence, confidence in the assessment conclusions is dependent upon demonstrating that the assessed scenario appropriately reflects the maximum realistic landscape and visual envelope of the Proposed Development.

Visual Effects

10.62. The County Council considers that visual effects are likely to represent one of the defining characteristics of the Proposed Development.

10.63. The combination of turbine height, blade movement, aviation lighting requirements and extensive visibility means that visual effects will inevitably extend across a substantial geographic area. Unlike many other forms of development, wind turbines are likely to remain visible over vast distances and, owing to their scale and movement, frequently become defining components of the view rather than simply additional features within it.

10.64. The County Council notes that visibility itself does not necessarily equate to a significant visual impact, however, the proposed turbines would extend to approximately 220m in blade tip height and would be introduced into landscapes which are characterised by open skylines, expansive views, broad

horizons and strong visual connectivity. The published landscape evidence repeatedly identifies these characteristics as important components of local landscape character and therefore relevant to the assessment of visual effects.

10.65. The County Council considers that particular scrutiny and attention should be given to:

- Representative viewpoint selection;
- Visibility of turbine hubs and blade tips;
- Sequential visibility along transport and recreational routes;
- Long-distance and panoramic views;
- Views from settlements and settlement edges;
- Views from promoted recreational routes (including long distance paths);
- Skyline effects and turbine back-clothing;
- Cumulative visual effects;
- Visual effects associated with substations, the BESS and other ancillary infrastructure; and
- The influence of aviation lighting on night-time views.

10.66. The County Council notes that GLVIA3 distinguishes between visibility and visual effects. It is therefore important that the assessment also explains how the magnitude of visual change identified at individual viewpoints informs the significance conclusions subsequently reported.

10.67. In several of the landscapes affected by the Proposed Development, visual receptors are likely to experience changes not simply through the appearance of additional structures, but through the introduction of large moving elements into views that are currently characterised by open skylines and relatively limited vertical development. The County Council considers that the interaction between turbine movement, scale and landscape context should therefore be clearly articulated within the assessment.

10.68. Where substantial changes in view composition are identified, the exercise of professional judgement should be transparent and clearly evidenced. This is particularly important where significance conclusions are moderated despite the apparent introduction of prominent turbine infrastructure into views that are currently characterised by openness and visual simplicity.

10.69. The County Council also considers that it is important for the assessment to recognise that wind turbines are experienced not only as static structures but also through movement. In many cases visual prominence arises through a combination of scale, movement and contrast within the receiving landscape. These characteristics may materially influence visual amenity even where turbines occupy a relatively small proportion of the field of view.

10.70. Furthermore, where reductions in visual effects are predicted over time through the establishment of mitigation planting, the ES LVIA should clearly explain the extent to which those conclusions rely upon assumptions regarding future vegetation growth. Given the proposed turbine height, the County Council considers that planting may reduce visibility of some ancillary infrastructure but is unlikely to materially reduce visibility of the turbines themselves. Consequently, any reductions in operational visual effects should be clearly justified and supported by evidence.

10.71. Finally, given the scale and the extent of predicted visibility, the County Council considers that particular care should be taken to ensure that the selected viewpoints adequately represent:

- The range of affected receptor types;
- The most sensitive visual receptors;
- Important recreational routes;
- Key settlement approaches;
- Views towards prominent heritage assets; and
- Locations where cumulative visibility may occur.

10.72. This is important because viewpoint selection underpins the assessment of visual significance and therefore directly influences understanding of the likely effects experienced by communities, visitors and recreational users.

Recreational Receptors

10.73. The County Council considers that recreational receptors are likely to be among the most sensitive receptors affected by the Proposed Development.

10.74. The Applicant identifies a substantial number of recreational receptors within the study area, including [but not limited to]: users of the Iceni Way, Fen Rivers Way, Hereward Way, Peddars Way and Norfolk Coast Path National Trail, Icknield Way, Nene Way, Greenwich Meridian Trail, National Cycle Network Routes 11, 13, 30 and 51, together with visitors to destinations including RSPB Lakenheath Fen, Wicken Fen National Nature Reserve, WWT Welney Wetland Centre, Thetford Forest and the wider Ouse Washes.

10.75. It is noted that many of these receptors are not simply passing through the landscape. Rather, the landscape itself forms an important component of the

recreational experience, with openness and skies being a dominant feature, extensive views, tranquillity and the distinctive Fenland and Breckland characteristics contributing directly to the enjoyment of these routes and destinations.

10.76. Whilst the County Council agrees that representative viewpoints can provide useful evidence, it is not persuaded that effects on recreational receptors can be fully understood through consideration of individual viewpoints alone.

10.77. For example, users of long-distance routes such as the Hereward Way and Fen Rivers Way experience the landscape sequentially and continuously over extended distances. The overall effect is therefore influenced not only by visibility at individual locations but also by factors such as:

- Duration of exposure;
- Cumulative visibility of multiple turbines;
- Changing landscape context;
- Route character;
- Perceptions of tranquillity and remoteness;
- Openness and skyline character; and
- The overall quality of the recreational experience.

10.78. This is particularly relevant in the context of the receiving landscape where the Proposed Development which would introduce up to 32 turbines of up to 220m blade tip height has the potential to influence recreational experience over a considerable distance.

10.79. The County Council notes that the Applicant intends to assess both representative static and sequential views. Whilst this approach is welcomed, the County Council considers that the ES should clearly explain:

- How route-wide effects have been assessed;
- How sequential views have informed significance conclusions;
- How cumulative visibility of turbine arrays has been considered;
- How effects on route character have been evaluated;
- How aviation lighting may affect recreational receptors after dark; and lastly
- How the recreational experience of affected routes and destinations may change over time.

10.80. The County Council also notes that mitigation planting may itself alter the experience of recreational users. Whilst planting may reduce visibility of some infrastructure, it may simultaneously reduce openness, alter long-distance views and modify the character of route corridors. Consequently, mitigation should not automatically be assumed to represent an unqualified benefit from a recreational perspective.

10.81. The assessment should therefore clearly distinguish between:

- Reducing visibility of infrastructure; and
- Maintaining the qualities that contribute to recreational enjoyment of the landscape.

10.82. This distinction is particularly important where significant effects on recreational receptors are moderated through assumptions regarding future planting, screening or changes in route character.

Residential Visual Amenity

10.83. The County Council notes that the Applicant proposes to undertake a Residential Visual Amenity Assessment (RVAA).

10.84. Whilst it is accepted that significant visual effects do not necessarily equate to unacceptable effects on residential amenity, nevertheless transparency within the assessment process is particularly important given the scale of the proposed turbines.

10.85. The County Council therefore considers that particular scrutiny should be applied where:

- Substantial changes in outlook occur;
- Turbines become dominant features within views;
- Effects persist over an extended period;
- Turbines occupy a significant proportion of the visible skyline; or
- Conclusions regarding acceptability rely upon future mitigation assumptions.

10.86. The distinction between significant visual effects and effects on residential living conditions should be clearly explained and supported by robust evidence.

Aviation Lighting

10.87. Overall, the County Council considers that the visual assessment has been undertaken using recognised methodology and is supported by a comprehensive suite of technical evidence and visual material.

10.88. Aviation lighting represents one of the more important topics associated with the Proposed Development.

10.89. It is noted that that turbines of the height proposed are likely to require aviation warning lighting. As such, aviation lighting should be viewed as a fundamental component rather than a peripheral design feature.

10.90. The County Council considers it particularly important that aviation lighting is assessed not only as an aviation safety requirement, but also a landscape and visual issue.

10.91. The published landscape evidence identifies tranquillity, remoteness, dark skies and rural character as important characteristics of the receiving landscape. Introduction of aviation lighting therefore has the potential to influence landscape character and visual amenity across a wider area than may be apparent from daytime assessments alone.

10.92. The County Council would therefore expect particular consideration to be given to [inter alia]:

- Effects on dark skies;
- Changes in night-time landscape character;
- Effects on perceptions of tranquillity;
- Cumulative aviation lighting effects;
- Effects on settlements;
- Effects on recreational receptors; and
- Opportunities to minimise lighting impacts through technological solutions where feasible.

10.93. The County Council would also welcome a clear explanation of how aviation lighting assumptions have informed overall conclusions regarding landscape and visual effects.

<u>Overall Commentary on Visual Effects</u>

10.94. Overall, the County Council anticipates that the visual assessment will be supported by a substantial evidence base including photomontages, wirelines, Zone of Theoretical Visibility (ZTV) mapping, visualisations and viewpoint analysis.

10.95. Consistent with Landscape Institute guidance, it is considered that the exercise of professional judgement should be transparent and clearly linked to baseline evidence and assessment findings.

10.96. In particular, further explanation would assist in understanding:

- How openness and skyline character have informed assessment conclusions;
- How settlement setting has been considered;
- How route-wide recreational effects have been evaluated;
- How assumptions regarding mitigation have influenced significance conclusions;
- How aviation lighting effects have informed the assessment; and
- How cumulative effects have been incorporated into overall conclusions.

10.97. Given the scale of the proposed development and the characteristics of the receiving landscape, the County Council considers that these matters warrant careful scrutiny through the Environmental Impact Assessment process.

10.98. As noted above, the County Council notes that the assessment will be supported by an extensive suite of mapping, viewpoints and visual material, which is welcomed. However, it is considered that some of the figures presented within the scoping material become difficult to interpret because of the volume of information displayed simultaneously.

10.99. For example, in certain figures the combination of extensive ZTV shading, multiple route networks, administrative boundaries, study area extents and visibility categories can make it difficult to readily understand the relationships between receptors, turbine visibility and assessment conclusions.

10.100. This is particularly relevant in relation to recreational receptors, where numerous promoted routes and PRoW overlap areas of predicted visibility. In such circumstances, it can become difficult to identify the degree of visibility experienced by individual routes or to understand how the mapped evidence has informed the significance conclusions reported within the assessment.

10.101. The County Council recognises that large-scale wind farm assessments necessarily involve complex datasets. Nevertheless, it is expected that clear presentation of evidence is important because it supports transparency in professional judgement and enables decision-makers, consultees and the public to understand how assessment conclusions have been reached.

10.102. Where figures are relied upon to support conclusions regarding sensitivity, magnitude of change or significance of effects, the County Council would

encourage the use of additional thematic mapping, inset plans, route-specific extracts or simplified figures where this would improve legibility and aid interpretation.

Cumulative Effects

10.103. The County Council considers cumulative effects to be a key issue for the Proposed Development and notes that cumulative effects should not be treated solely as a question of visibility. Rather, cumulative effects may arise through the combined influence of multiple developments on:

- Landscape character;
- Openness;
- Skyline character;
- Settlement setting;
- Recreational experience;
- Tranquillity;
- Visual amenity; and
- Sense of place.

10.104. Published landscape evidence already identifies renewable energy development and other large-scale infrastructure as forces capable of influencing landscape character.

10.105. The County Council therefore considers that cumulative assessment should address not only whether developments can be seen together, but also whether they collectively contribute towards progressive changes in the character and experience of the wider landscape.

10.106. This is particularly relevant where multiple projects may be experienced from the same settlements, along the same transport corridors, from the same recreational routes and / or within the same landscape character areas.

10.107. The County Council would therefore welcome clear explanation regarding how cumulative change to landscape and visual character, settlement setting, recreational experience, skyline character and perceptions of tranquillity have informed the overall assessment conclusions.

Landscape Environmental Management Plan

10.108. The County Council welcomes the commitment to prepare a detailed Landscape Environmental Management Plan and acknowledges its importance as the principal mechanism for securing mitigation and enhancement measures.

10.109. However, many of the reductions in effects that may ultimately be identified within the assessment are likely to be dependent upon mitigation measures that are not yet fully defined.

10.110. It is therefore considered that confidence in the predicted operational outcomes will be intrinsically linked to the quality, deliverability and long-term stewardship of the final management plans.

Reliance on Mitigation Planting

10.111. The County Council notes that future reductions in effects are likely to be influenced by the successful establishment and long-term management of proposed planting and habitat creation measures.

10.112. Whilst such measures may provide benefits in some locations, the County Council considers that their effectiveness should not automatically be assumed.

10.113. This is particularly relevant because many of the qualities identified within the baseline, including openness, expansive views, skyline character and tranquillity, cannot necessarily be recreated through planting measures.

10.114. The County Council therefore considers that reductions in significance reliant upon future mitigation should be clearly justified and supported by evidence.

Monitoring, Establishment and Adaptive Management

10.115. The County Council welcomes the commitment to monitoring and long-term management.

10.116. However, monitoring should assess not only whether planting survives but whether the landscape and visual outcomes assumed within the assessment are being achieved in practice.

10.117. It is therefore considered that future management plans should include:

- Measurable objectives;
- Success criteria;
- Implementation triggers;
- Fixed-point photography;
- Visual monitoring requirements;
- Replacement planting obligations;
- Adaptive management measures; and
- Defined remedial actions where objectives are not achieved.

Recreational Routes and Public Rights of Way

10.118. The County Council considers that future management plans should provide specific consideration of recreational receptors.

10.119. Where significant residual effects are identified, opportunities should be explored to secure route-specific enhancements and wider improvements to recreational infrastructure.

10.120. Such measures may include:

- Access improvements;
- Signage and interpretation;
- Connectivity enhancements;
- Landscape and green infrastructure enhancements; and
- Measures designed to improve the quality of the recreational experience.

Nature Recovery and Green Infrastructure

10.121. The County Council welcomes commitments relating to biodiversity enhancement and environmental improvement.

10.122. The Norfolk Local Nature Recovery Strategy (NLNRS) seeks to establish a connected Nature Recovery Network across Norfolk through habitat restoration, improved ecological connectivity, strengthened landscape resilience and enhanced access to nature. The LNRS emphasises the importance of creating ***"more, bigger, better and more connected"*** habitats and recognises that nature recovery should be pursued at a landscape scale rather than through isolated site-based interventions.

10.123. The County Council therefore considers that future management plans should clearly demonstrate how proposed habitat creation, woodland planting, hedgerow enhancement and green infrastructure measures contribute not only to site mitigation but also to wider ecological connectivity, landscape resilience and nature recovery objectives.

10.124. Given the scale of the Proposed Development, the County Council considers that opportunities should be explored to deliver lasting landscape and environmental benefits which extend beyond the footprints and boundaries and contribute towards wider habitat networks and environmental enhancement initiatives

Additional Requirements and Amendments

10.125. Given the scale of the Proposed Development, the extent of predicted visibility and the reliance placed upon future mitigation and management measures throughout the assessment, the County Council considers that future requirements and associated management plans should clearly demonstrate:

- How mitigation responds to the specific landscape sensitivities identified through the LVIA;
- How effects on settlement setting and rural character have been addressed;
- How recreational receptors and route-wide experiential effects have been considered;
- How aviation lighting effects will be minimised wherever reasonably practicable;
- How cumulative landscape and visual effects have informed mitigation design;
- How mitigation effectiveness will be monitored throughout the operational life of the Scheme;
- How failed or underperforming mitigation will be remedied;
- How adaptive management measures will be implemented where mitigation objectives are not achieved; and
- How long-term management commitments will be secured and funded.

10.126. The County Council also considers that future management plans should include measurable objectives, monitoring indicators and clearly defined intervention thresholds so that the effectiveness of mitigation can be objectively assessed over time.

10.127. These measures are necessary because many of the reductions in significance anticipated within the assessment are dependent upon future mitigation, habitat creation and management measures. Robust requirements are therefore required to provide confidence that the landscape and visual outcomes can be delivered and maintained throughout the operational lifetime of the Proposed Development.

Conclusion

10.128. The County Council recognises the national importance of renewable energy generation and accepts that significant landscape and visual effects are an inherent consequence of a development comprising up to 32 turbines with a maximum blade tip height of 220m.

10.129. The County Council also broadly agrees with the baseline evidence presented in the scoping material and does not take issue with the proposed assessment methodology. Indeed, the published landscape evidence for Norfolk and Suffolk identifies many of the same baseline characteristics described within

the scoping material, including openness, expansive views, tranquillity, settlement setting, recreational value and strong rural character.

10.130. However, the County Council considers that particular scrutiny should be given to [inter alia]:

- Landscape value, susceptibility and sensitivity;
- Openness, skyline character and expansive views;
- Settlement setting and village identity;
- Recreational experience and sequential route effects;
- Aviation lighting and night-time effects;
- Cumulative effects;
- The assessment of very large-scale turbines within open landscapes; and
- The extent to which future mitigation influences significance conclusions

10.131. The County Councils principal concern is not whether effects will occur, rather, moreover it is concerned whether the receiving landscape has been appropriately valued, whether the degree of change has been fully recognised, whether the significance conclusions are clearly supported by the evidence presented and whether the proposed mitigation and management measures are capable of delivering the outcomes upon which the assessment relies.

10.132. Given the scale of the proposed turbines and the characteristics of the receiving landscape, the County Council considers that particular care should be taken to ensure that effects on openness, tranquillity, settlement setting, recreational experience and cumulative landscape change are fully understood and appropriately reflected in the final ES.

10.133. The comments contained within this review focus on the likely local landscape, visual and recreational effects of the Proposed Development and the adequacy of the associated mitigation and management measures. They are primarily directed towards matters where professional judgement has been exercised within the LVIA and should not necessarily be interpreted as methodological objections to the Applicant's assessment.

10.134. Unless otherwise stated, the County Council considers that the matters identified are capable of resolution through further clarification, refinement of mitigation proposals, amendments to management plans and the securing of appropriate requirements through the Development Consent Order (DCO).

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
Ben Parvin	[redacted]	26/02821/COA	EN0110042	27.10.2026

Dear Sir/Madam,

Proposal: Redmere Wind Farm

Site Address: Located near Shippea Hill, in East Anglia.

The application site is located in East Anglia within the administrative areas of East Cambridgeshire District Council, West Suffolk District Council, King's Lynn and West Norfolk Borough Council, Cambridgeshire County Council, Suffolk County Council and Norfolk County Council.

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,

Ben Parvin
Principal Development Management Officer

South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge,
CB23 6EA
www.scambs.gov.uk

South Cambridgeshire District Council

PINS Reference: EN0110042
Contact (DCO Lead): Elisabeth Legierse
[redacted]@greatercambridgeplanning.org

27 October 2026

RedmereWindFarm@planninginspectorate.gov.uk

Electronic submission only

Dear Sir / Madam

Application by Vattenfall Wind Power Ltd for an Order Granting Development Consent for the Redmere Wind Farm (Ref: EN0110042): – 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 1 October 2026 for the Redmere Wind Farm Development Consent Order (DCO).
2. The Site lies approximately 6.5km north-east of Ely and close to the settlements of Redmere, Feltwell and Lakenheath. The Indicative Order Limits extend across the administrative areas of East Cambridgeshire District Council, West Suffolk District Council, Kings Lynne and West Norfolk Borough Council, Cambridgeshire County Council, Suffolk County Council and Norfolk 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 32 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 is anticipated to have an installed generating capacity of up to 303MW, and the BESS would have an installed capacity of up to 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 though Burwell Main Electricity Substation has been identified as the closest connection point.
8. Notwithstanding the above, the Council has reviewed the Environmental Impact Assessment Scoping Report and provided technical comments, as outlined in this letter. Please note, however, that the comments below are made on a without prejudice basis, and the Council reserves the right to make further additional comments on the DCO application, where required.

Principle of Development and Grid Connection

9. SCDC recognises the urgent national need for additional energy capacity and generally supports the principle of renewable and low-carbon energy generation.
10. However, SCDC shares the concerns raised by other local authorities regarding the absence of information on the proposed grid connection and associated transmission infrastructure.
11. 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.
12. 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)

13. 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.

14. 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.

15. 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.

16. 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)

17. 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 and Cambridge City. No part of South Cambridgeshire administrative area falls within the 10km study area.
- Viewpoint 23 has been appropriately located to capture visibility and potential impacts on Wicken Fen.
- Viewpoint 25 has been appropriately located to capture impacts on users of the Fen Rivers Way and nearby villages.

- SCDC notes that Views 23 and 25 may also serve as reasonable proxy locations for understanding the nature and extent of visibility beyond these points.
- Paragraph 9.3.28 identifies Cambridge as a receptor; however, no dedicated viewpoint has been included to assess potential effects on the city. Given that Cambridge is identified as a receptor, the Applicant should consider inclusion of a dedicated viewpoint within or in proximity to the city to enable a robust assessment of potential effects.
- The report proposes that not all receptors will be assessed through the use of dedicated viewpoints and may instead be assessed using proxy viewpoints, wirelines, photomontages or other visualisation techniques, where appropriate.

18. It is considered that other aspects of the scoped in material are generally agreed with but there is an expectation that through iterative testing both additional viewpoints and removal of viewpoints may be expected.
19. Generally, we are satisfied with the scope and methodology presented in the scoping report and the repeated commitment to iterative design approaches.

Cumulative Effects

20. The Council expects the cumulative assessment to include strategic growth proposed across the Greater Cambridge area, including strategic allocations, planned new settlements and other major development proposals. 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

21. 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.
22. Given that the heights of the proposed turbines exceeds 149m, the Scoping Report proposes consultation with Cambridge Airport and other aviation stakeholders as they have the potential to impact on aviation safeguarding, radar or other aviation-related constraints. SCDC welcomes this approach.

23. 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 (ES Scoping Ch. 8)
- 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

24. 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

Elisabeth Legierse MRTPI

Principal Planning Officer, DCO Lead (NSIP/Major Infrastructure Delivery)
Greater Cambridge Shared Planning Service

SOUTHERY & DISTRICT INTERNAL DRAINAGE BOARD

GENERAL MANAGER: ANDREW NEWTON
CLERK: TERESA REED

DRAINAGE OFFICE
MAIN STREET
PRICKWILLOW
CAMBS. CB7 4UN
TEL: ELY (01353) 688296

Sent by email

Our ref: AN/LM Your ref: EN0110042 8th October 2026

Dear Sirs

ENO0110042 – Redmere Wind Farm – EIA Scoping and Consultation and Regulation 11 Notification
Redmere North

The site is within the Southery Drainage District. I note that there are no references to Internal Drainage Boards, so the applicant will need to make themselves aware of our role.

The Board has Byelaws formed under the Land Drainage Act 1991, to protect the District and our access to our main drains. These byelaws are required for the following:

- Any works or structure in, over, under or within nine meters of a Board's Main Drain.
- Culverting of any watercourses within the Board's District.
- Any surface/foul water discharge into any watercourse within the Board's District. The Boards greenfield run off rate is 1.1 litres/sec/ha.

The following activities listed in the document may require the Board's consent:

- Temporary haul roads & construction area.
- Roadways & bridges.
- Hard standing area.
- Wind turbines.
- Fencing.
- Cable routes.
- CCTV Cables.
- Discharge of water into the Board's system.

The Board's consent will be required for each individual activity and is separate to the planning process.

I would urge the applicant to engage with the Board as soon as possible, so they are aware of our requirements.

Yours faithfully,

[redacted]

Engineer

Suffolk County Council

REDMERE ONSHORE WIND FARM

EN0110042

Scoping Consultation Response

Suffolk County Council

29 October 2026

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Glossary of Acronyms

AIL	*Abnormal Indivisible Load*
BESS	*Battery Energy Storage System*
CEMP	*Construction Environment Management Plan*
CTMP	*Construction Traffic Management Plan*
DCO	*Development Consent Order*
EIA	*Environmental Impact Assessment*
ES	*Environmental Statement*
ESDAL	*Electronic Service Delivery for Abnormal Loads*
HE	*Historic England*
HER	*Historic Environment Record*
HGV	*Heavy Goods Vehicle*
HRA	*Habitats Regulations Assessment*
LEMP	*Landscape and Ecology Management Plan*
LHA	*Local Highway Authority*
LLFA	*Lead Local Flood Authority*
LNRS	*Local Nature Recovery Strategy*

MW	*Megawatt*
NSIP	*Nationally Significant Infrastructure Project*
OHIC	*Office for Health Improvement and Disparities*
PINS	*Planning Inspectorate*
PROW	*Public Rights of Way*
REAC	*Register of Environmental Actions and Commitments*
RSPB	*Royal Society for the Protection of Birds*
SBIS	*Suffolk Biodiversity Information Service*
SCCAS	*Suffolk County Council Archaeological Service*
SLCA	*Suffolk Landscape Character Assessment*
SMP	*Soil Management Plan*
SPA	*Special Protection Area*
STGO	*Special Types General Order*
TCPA	*Town and Country Planning Act*
TRO	*Traffic Regulation Order*
VRRP	*Vegetation Retention and Removal Plan*

"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 ("**PINS**") Environmental Impact Assessment ("**EIA**") Scoping Consultation for Redmere Onshore Wind Farm occurring between 1 and 29 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 Redmere (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 32 wind turbines (with 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 303MW. The grid connection will not form part of the Development Consent Order ("**DCO**") application."*

1.3 The Proposed Development will directly affect the following County Electoral Divisions in Suffolk:

i. Row Heath

ii. Mildenhall

iii. Brandon

1.4 Therefore, Suffolk County Council ("**SCC**") maintains an interest as a Host Local Authority for the Proposed Development. SCC responses may therefore include a wide range of expertise, including matters related to: the Suffolk County Council Archaeological Service ("**SCCAS**"), Ecology, Economic Development and Tourism, Landscape, the Lead Local Flood Authority ("**LLFA**"), the Local Education Authority, the Local Highway Authority ("**LHA**"), Local Minerals and Waste Planning Authority, Public Health, Public Rights of Way and Other Green Access, 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

[1] https://www.suffolk.gov.uk/asset-library/scc-energy-water-commercial-transport-and-adaptive-infrastructure-policy-240226-final.pdf

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 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 developments proposing co-located BESS with a significantly lower capacity than its intended generating capacity. The Council has does recognise that the Scheme may wish to 'overplant' for generating capacity relative to BESS capacity, as occurs on solar schemes, however this disparity goes beyond that understanding. Therefore, the Council has raised concerns with the Applicant that the Scheme may wish to increase the BESS capacity in subsequent stages the design of the Proposed Development. The Council holds the position that the public should be provided with a full understanding of the BESS element of the Scheme, including the reason for the disparity in generating and BESS capacity. 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 Chatteris Onshore Wind

[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

Farm (also promoted by the Promoter). This should also include any Town and Country Planning Act 1990 ("**TCPA**") applications, emerging or consented, and if any TCPA or NSIP applications are known prior to submission then the assessment should be updated to reflect these.

2.5 The Council has concerns regarding the proximity of the Proposed Development to RAF Mildenhall and RAF Lakenheath. Further to the commitments made in the Commitments Register with regard to Aviation matters (AVI-01 to AVI-04), the Council would expect these matters to be finalised prior to the determination of the DCO and discussed during the Examination.

2.6 The draft Order Limits for Redmere Onshore Wind Farm interact with Anglian Water's Bexwell to Bury St Edmunds[3] (71km) water pipeline, passing directly through the centre of the southern site and to the west of the northern site. Whilst this scheme was submitted to, and approved by, the relevant District or Borough Councils as separate TCPA applications, this represents a significant strategic water main pipeline. The pipeline is built out and finalising land restoration activities. As a result of this development, the ground conditions will therefore be affected. The Applicant should therefore consider for the potential impact that construction activities will have on waterlogged ground and that de-watering might change the support for the pipeline. SCC therefore proposes that Vattenfall discusses this matter with Anglian Water as an urgent priority.

[3] https://www.anglianwater.co.uk/environment/investing-in-the-future-of-water/strategic-pipeline-alliance/keeping-taps-flowing-for-future-generations/bexwell-to-bury-st-edmunds-pipeline

Impacts by Service Area

3 Archaeological Service

3.1 The Applicant has proposed that cultural heritage, including below ground archaeological remains, is scoped into the Environmental Statement ("**ES**") for the Development Consent Order ("**DCO**") application. Suffolk County Council Archaeological Service ("**SCCAS**") welcomes this approach.

3.2 However, SCCAS notes with concern that there is no apparent consideration of the fenland landscape and associated geology, in terms of archaeological implications, within the scoping report. These factors significantly influence both the archaeological potential of the site and the suite of evaluation techniques required to assess that potential and the likely impacts of the Proposed Development. They will also have implications for the engineering approaches necessary to construct the scheme and, consequently, the nature and extent of archaeological impacts.

3.3 SCCAS is also concerned that the scoping report has relied upon data extracted from Heritage Gateway to inform this initial assessment. This is a static dataset which is neither appropriate, nor endorsed by SCCAS, for commercial development purposes. The Suffolk dataset has not been updated for several years and excludes a number of sensitive records, and additional datasets, held within the Suffolk Historic Environment Record ("**HER**"). Whilst SCCAS welcome the commitment to consult the County HERs during preparation of the ES, SCCAS strongly recommends early engagement with both the Suffolk HER and SCCAS Planning Advice Team to agree the scope of HER searches and discuss appropriate assessment and evaluation methodologies.

3.4 The scoping report identifies desk-based assessment and walkover survey as the principal archaeological assessment methods but provides only limited very commitment to further evaluation.

3.5 Any desk-based assessment should provide a robust assessment of archaeological potential, as indicated by known archaeological remains, but should also explicitly consider the limitations of the available evidence, including the depth, character and extent of Holocene deposits. The assessment should also incorporate analysis of aerial photography and LiDAR data, and address the use of other techniques, such as geophysical survey, geoarchaeological investigation and trial-trenched evaluation to provide an appropriate level of understanding to properly assess the impacts of the development and inform a suitable mitigation strategy.

3.6 SCCAS recommends that Geophysical survey is considered, and that advice should be sought from a suitably qualified geophysical survey specialist with experience of fenland environments.

3.7 Of particular importance will be a programme of geoarchaeological assessment. This should draw on existing datasets but should be augmented by a programme of new borehole and/or test-pitting investigations, alongside hydrological assessment, to develop a thorough understanding of the sedimentary sequences, the potential for the preservation of organic remains and palaeoenvironmental deposits, and the possible impacts of construction and engineering activities. SCCAS advises early engagement with the Historic England ("**HE**") Regional Science Advisor regarding the scope of these investigations and the assessment of impacts upon heritage assets both within and beyond the red-line boundary. A broader selection of HE guidance should be consulted, including guidance for environmental archaeology and wetland archaeology.

3.8 Trial-trench evaluation will also be required to ground-truth geophysical survey results and assess near-surface archaeological potential for areas that will be affected by construction, enabling works and ecological compensation/BNG measures involving ground disturbance. This is particularly important on areas of slightly higher ground within the fenland landscape, which are often focal points for Neolithic and Bronze-Age activity. However, the Applicant should also be aware of the potential archaeological significance of the full depth of fenland deposits.

3.9 SCCAS emphasises the importance of these investigations in informing the Environmental Impact Assessment ("**EIA**"). The ES should also set out a properly informed proposed strategy for avoiding, minimising and mitigating impacts arising from the development and any associated activities.

Table 8.1

3.10 SCCAS welcomes the proposal to micro-site infrastructure where feasible to avoid of minimise harm to heritage assets. However, the extent, significance and sensitivity of heritage assets cannot be adequately established through desk-based assessment and walk-over survey alone.

3.11 The table fails to identify indirect physical impacts, such as wider changes to the hydrological environment, as a Potential Impact Pathway for buried heritage assets with archaeological interest and palaeoenvironmental deposits. It is essential that detailed consideration of hydrological change, both during and post construction, and the potential impacts of dewatering on

preserved organic deposits, organic and metal artefacts, and palaeoenvironmental remains is included.

3.12 Trial trenching is identified within this table as a mitigation measure. Whilst trial-trenching may contribute to mitigation design, it is primarily an evaluation technique used to characterise archaeological remains and inform an appropriate mitigation strategy.

3.13 SCCAS is pleased to see that combined impacts have been scoped into the assessment.

3.14 Decommissioning has been scoped out. SCCAS considers that decommissioning should remain within the scope, as there can be no certainty at this point in the project that future decommissioning activities will be confined within areas previously impacted by construction, and both direct and indirect impacts may arise. The potential for such activities to extend beyond the original construction footprint is acknowledged within the table and should be fully assessed.

4 Ecology

4.1 SCC welcomes the inclusion and general scope of biodiversity and ecology assessment included within the scoping report. The inclusion of separate chapters for both Biodiversity and Nature Conservation, and Ornithology is expected and welcomed.

4.2 The scoping determination based on the information provided appears valid and the inclusion or exclusion of receptors in both chapters 6 and 7, for further assessment, is tentatively agreed.

4.3 SCC remains concerned that the environmental implications of the grid connection remain largely undefined. Whilst it is acknowledged that the connection infrastructure may be subject to a separate consenting process, it is functionally necessary to enable operation of the Proposed Development. The ES should therefore clearly demonstrate how the environmental implications of the grid connection have been considered, including cumulative and in-combination effects where sufficient information is available. Various elements of the Proposed Development remain insufficiently defined at this stage, including cabling, Battery Energy Storage System ("**BESS**"), borrow pits and associated infrastructure. These elements have the potential to result in significant ecological impacts and, in the absence of detailed design information, a robust and clearly defined worst-case assessment approach will be required. The basis for any worst-case assumptions should be clearly explained and demonstrably reasonable in the context of the known and potential baseline conditions.

4.4 Given the preliminary survey results, within the Ornithology chapter (7.3.11), demonstrating substantial use of the Site and surrounding area by Special Protection Area-associated species, SCC would expect a comprehensive assessment of functionally linked land and connectivity with designated sites, supported by appropriate survey data and population-level analysis as indicated within the proposed methodology.

4.5 In regard to Operation and Maintenance, there is no indication that monitoring will take place at any point in the operational phase to ensure collision mortality of birds would remain not significant. Given the potential for bird populations to alter in terms of number, species and possibly seasonal occurrence throughout the operational phase, monitoring would be expected to inform any requirement for adapted mitigation.

4.6 Assessments to be undertaken prior to decommissioning, again stated as being based on worst-case scenario, will need to incorporate the potential for habitat, animal and bird populations to have altered based on: creation and maturation of any proposed enhancements and mitigation (including BNG); altered status and designation criteria of bird populations and designated sites and changes to these bird populations through natural spatial population alterations e.g. colonisation, recolonisation, climate change impacts etc.

4.7 Whilst the methodology for assessment meets standard requirements, SCC would like to ensure that the Applicant will also incorporate within their impact assessment, the implications of the recommendations arising from the Third Network Review of Special Protection Areas ("**SPA**") (Phase 2) in their assessment and the subsequent additions to the SPA areas and qualifying interests within the zone of influence of the Proposed Development, including, as per Royal Society for the Protection of Birds ("**RSPB**") informal comments:

4.8 Lakenheath Fen: Classification as a new SPA site for both breeding and non-breeding crane. The SPA review also considers 18 new sites for breeding bittern and 6 new sites for non-breeding bittern. Given that Lakenheath currently supports 5.5% of the booming male bitterns it is highly likely that Lakenheath Fen is one of those un-named sites.

4.9 Nene Washes SPA: The addition of breeding Bittern, non-breeding Whooper Swan, breeding and non-breeding Common Crane and breeding Redshank as features of the Nene Washes SPA, and boundary extensions to this site for Cranes.

4.10 Breckland SPA: The addition of breeding and non-breeding Kingfisher as features, and boundary extensions to the SPA for breeding Nightjar and breeding Woodlark.

4.11 Ouse Washes SPA: 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.

4.12 Any failure to consider this information within the impact assessment and Habitats Regulations Assessment ("**HRA**") for the proposals could certainly result in inaccurate outcomes of both the overall impact assessment and any HRA.

4.13 SCC have also been contacted by [redacted] of the Iceland Whooper Swan Study who is undertaking detailed research into use of parts of the Proposed Development site and the wider area by SPA qualifying populations, specifically Whooper Swans.

4.14 They have informed us that they have noteworthy research which could significantly inform the understanding of the use of the site by local populations of Whooper Swans. [redacted] has stated in correspondence that they have contacted the Applicant to make them aware of the data collected through the research. SCC would expect this data to be assessed in detail and used wherever relevant in the assessment process. Any decisions to not include all or part of these data within the assessment process will need clear explanation and justification.

4.15 SCC notes that significant elements of both the ecological and ornithological survey effort remain incomplete. Consequently, a number of receptors have been 'scoped in' primarily due to current uncertainty. The ES should clearly demonstrate how completed survey datasets have informed the final scope of assessment and should justify any subsequent scoping decisions based on robust evidence.

4.16 Whilst the use of NatureScot Guidance to inform methodology and assessment remains standard for the UK, given the unprecedented nature of the proposals in terms of size and number of turbines in this particular geographic area, topographical landscape and species assemblages throughout the year, SCC would expect to see a significant literature review in regard to survey effort. Including methodology and outcomes from a variety of sources of potential relevance such as: Fijn, R.C., Krijgsveld, K.L., Tijsen, W., Prinsen, H.A.M. & Dirksen, S. (2012). *Habitat Use, Disturbance and Collision Risks for Bewick's Swans Cygnus columbianus bewickii Wintering Near a Wind Farm in the Netherlands*. Wildfowl, 62, 97-116. and Altenburg & Wymenga. *Windfarms and birds in the Eemshaven, Dutch Wadden Sea*. Research programme investigating collision risk, migration behaviour, bird movements and turbine curtailment in the Eemshaven area etc.

4.17 SCC would like to ensure that all possible mitigation methods are considered wherever required including, in regard to collision risk and possibly impacts of

Barotrauma, curtailment of turbines and painting of blades and/or towers. It is SCC's understanding that the Promoter has dismissed the concept of painting the blades, however, this was included in a list of potential mitigations during the in-person consultation events. This mitigation should therefore continue to be explored.

4.18 SCC notes that the Site is located within an area containing substantial peat deposits and associated water-dependent habitats. The ES should clearly quantify any peat loss, disturbance or hydrological impacts arising from turbines, access tracks, cabling, borrow pits and associated infrastructure, and demonstrate how the iterative design process has sought to avoid and minimise impacts to peat soils and their associated carbon stores wherever possible.

4.19 The scoping document does not provide any information on a likely BNG strategy for the Proposed Development. Limitations of knowledge through lack of detailed design notwithstanding, given the scale of land-take and the extent of agricultural land within the Site, SCC would welcome early confirmation of the BNG delivery strategy, including likely habitat creation proposals, anticipated habitat condition targets, and opportunities to contribute to the Local Nature Recovery Strategy ("**LNRS**")[4] priorities and Associated Biodiversity Areas in order to help demonstrate an achievable and satisfactory BNG outcome is likely.

4.20 SCC welcomes the commitment to undertake a cumulative effects assessment. However, the Scoping Report provides limited detail regarding the developments and infrastructure that will be included within the cumulative assessment, particularly in relation to other renewable energy projects, energy storage facilities, transmission and grid connection infrastructure, and associated habitat change across the wider area. SCC expects the Environmental Statement to clearly justify the cumulative assessment scope and to robustly assess potential cumulative and in-combination effects on ecological and ornithological receptors, including functionally linked land and populations associated with nationally and internationally designated sites.

5 Landscape

The Proposed Scheme

5.1 SCC considers that the information provided by the Applicant is rudimentary, even for the Scoping stage, and therefore encourages the Applicant to engage

[4] https://www.suffolk.gov.uk/planning-waste-and-environment/lnrs/suffolks-lnrs

with the Local Authorities and other relevant stakeholders to improve clarity at the earliest opportunity.

5.2 Figure 2.2 Site Layout shows the DCO limits and indicative turbine locations. However, no information is provided for any of the other elements of the scheme, such as construction compounds and concrete batching plant, the Battery Energy Storage System ("**BESS**"), the proposed on-site substation and associated compound, SuDS, to name but a few.

5.3 It is of great concern that the point of connection to the National Grid, which is integral to the functionality of the scheme, is not part of this application. The connection is proposed at Burwell Substation, which is over 15km to the south-west of the Site of the Proposed Development. No information has been offered on how (overhead or underground) the point of connection would be achieved or via which potential routes this connection would be achieved. The outline design principles at paragraph 2.3.8 are vague and non-committal and offer no re-assurance. SCC considers that the grid connection needs to be scoped into this scheme.

5.4 It is noted Table 2.1 Indicative Design Parameters, states that landscaping and planting would be designed so as not to impede site security. SCC would welcome if the design parameters would include considerations on how appropriate planting schemes would help to integrate and embed those elements of the scheme that might be mitigable.

5.5 With regards to decommissioning, SCC appreciates that the detail will need to be agreed nearer the time. However, certain parameters should be detailed during the Examination and secured within the DCO, to be discharged as a Requirement, such as principles regarding foundation and cable removal and reinstatement of land to former versus any agreed use.

5.6 SCC is concerned that because of the size of the turbines that the landscape and visual effects resulting from this scheme would be of an unprecedented scale and geographical extent in England. Wind turbines of this height have thus far been largely limited to offshore developments. This onshore scheme has the potential to be perceived not as a development within the landscape, but one that transforms and dominates the landscape and transforms it from a predominantly rural/agricultural into an energy landscape, which would visually reach far beyond the Fens it is located in.

Data Sources and Baseline Assessments

5.7 SCC considers that it is acceptable to use the Landscape Character Typology for the East of England as the framework of the landscape assessment, as the scheme straddles three counties. However, more local landscape character

assessments should also be referred to as far as available. This should include the guidance within the Suffolk Landscape Character Assessment (**"SLCA**").

5.8 Where historic landscape characterisation is available, it should also be referred to. It should be noted that the historic evolution of the Fens is complex, as different areas were drained at different times and have different historic backgrounds. It is therefore important, given the geographical extent of the Scheme, to understand the varied development within different parts of the Proposed Development.

5.9 The Suffolk Local Nature Recovery Strategy ("**LNRS**") needs to be included in the data source documents.

5.10 SCC would further point the Applicant to the Suffolk Biodiversity Information Service ("**SBIS**")[5], for example for, but not limited to, information on trees, hedgerows and other vegetation cover.

5.11 The Applicant should also be aware of the Revised Ancient Woodland Inventory.

5.12 In addition, mitigation and landscape restoration proposals should also refer to historic maps.

Tree and Hedgerow Surveys

5.13 It is noted that trees and woodlands are dealt with under Forestry within Chapter 17 Other Environmental Topics. Except for Ancient Woodland, which is to be dealt with in the Biodiversity and Nature Conservation chapter of the ES. SCC considers that this approach is unhelpful as it will be fragmenting the information regarding trees and woodlands and will make it more difficult to understand the totality of impacts.

5.14 For the assessment of Landscape and Visual Amenity effects, a clear understanding of the impacts on vegetation resulting from the scheme is integral. SCC therefore requests that a Detailed Arboricultural Impact Assessment is carried out, including detailed tree and hedgerow surveys in accordance with BS 5837:2012 Trees in relation to design, demolition and construction (UKHab surveys are not considered sufficient). With regards to hedgerows, it will also need to be ascertained whether any would need to be considered as Important Hedgerows under the Hedgerow Regulations 1997.

5.15 In a landscape as sparsely vegetated as the Fens, SCC has the expectation that the Applicant will avoid the loss of any woodland and veteran/ancient trees. The loss of mature trees and Important Hedgerows should also be

[5] https://suffolkbis.org.uk/

avoided wherever possible, and this should be demonstrated by the Applicant and anchored in to the Commitments Register.

5.16 Any vegetation losses that cannot be avoided will need to be fully recorded, including photographic evidence prior to removal, and exact quantifications in schedules as well as spatial identification of drawings of a suitably fine-grained scale.

5.17 SCC would be happy to engage further with the Applicant in this matter.

Design Principles

5.18 SCC welcomes the inclusion of the design principle to minimise effects on landscape character, visual amenity and valued views through careful siting and layout design (section 4.4).

Rochdale Envelope

5.19 Given that the Rochdale Envelope assumes a reasonable worst-case scenario for assessment purposes, SCC would welcome a commitment by the Applicant to reduce landscape and visual amenity impacts and effects during the detailed design phase, effectively pulling back from the reasonable worst-case scenario.

5.20 With regards to flexibility, suitable flexibility should be built into the DCO to avoid the loss vegetation and enable micro-siting to reduce impacts on vegetation post consent. In SCC's experience, the DCO boundary is often drawn without consideration of vegetation impacts; when the boundary is very tight there is then no room for manoeuvre to save vegetation. Whilst not standard practice, SCC promotes that there should be greater flexibility so that if the landowner and the Local Planning Authority agree to avoid landscape features then the DCO boundary should be able to accommodate this. Therefore, the DCO red line boundary should provide sufficient scope for such flexibility.

Proposed Scope for Landscape and Visual Matters

5.21 SCC considers that Construction Phase impacts and effects need to be fully assessed and not scoped out. Not only will there be more movement and noise from construction activities, it is also likely that during winter working there would be additional construction lighting. It is therefore unreasonable to scope this out.

5.22 SCC considers that Operation Phase impacts and effects need to be fully assessed and not scoped out, including for landscape character beyond 10km.

5.23 SCC considers that Decommissioning Phase impacts and effects need to be assessed to a reasonable extent and as far as possible at this stage.

Decommissioning could have adverse effects greater than that of the operational phase and could, for example, affect successful mitigation planting.

Approach to Mitigation

5.24 The mitigation hierarchy presented in Plate 5.1 differs slightly from the usual Avoid - Minimise - Mitigate/Restore - Compensate; however, SCC welcomes the commitment by the Applicant that any remaining unmitigated or residual impacts should be offset and compensated for.

5.25 SCC considers that, given the scale and the nature of the scheme, compensation in form of landscape-scale landscape restoration proposals and community benefits will be essential.

5.26 However, where possible, any planting removed to enable construction will need to be reinstated. It should be noted that, should this reinstatement planting form part of the BNG calculation, its success will affect the BNG outcome. SCC therefore recommends either applying BNG calculations that do not rely on the success of reinstatement planting or allowing adequate and dynamic establishment and aftercare periods for reinstatement planting (well beyond five years), before handing back to landowners. SCC would welcome further engagement with the Applicant in this matter.

5.27 SCC welcomes the staging of mitigation measures and residual effects assessments as outlined in paragraph 5.3.18.

Additional Considerations

5.28 At least one of the additional areas of land (in Great Yarmouth) is well vegetated. It will need to be considered which measures would be least harmful to the existing vegetation, for example coppicing rather than removal, to accommodate over-sailing. SCC advises engagement with the Norfolk LNRS on this matter.[6]

LVIA Methodology

5.29 SCC broadly agrees with the methodology for the LVIA as presented in Redmere Wind Farm EIA Scoping Report - Appendix C: EIA Methodologies, September 2026, except for the following points:

General comments

5.30 The bullet points in tables should not be linked by 'and', as this might be interpreted that both points need to be fulfilled; either there should be no linking word or 'and/or'.

[6] https://www.norfolk.gov.uk/article/39010/What-a-Local-Nature-Recovery-Strategy-is

Landscape assessment

5.31 SCC does not agree with Table 5.7 Definitions of Value attached to Views.

5.32 The absence of evidence of value does not equate with the evidence of absence of value. Views, which are valued by local visual receptors should not be placed in the 'low value' category. This should be reserved for views with considerable detracting features.

5.33 The duration of effects should also define at what point a development would be considered permanent.

5.34 SCC considers that the Applicant will need to define the local character of the affected areas, how well they represent their landscape type and how this will be affected by the development.

Visual assessment

5.35 SCC considers that the standard assessment for visual effects during winter (as proposed in paragraph 5.3.12) is insufficient for the Proposed Development.

5.36 At 220m to tip height, the turbines for Redmere are taller than any other onshore turbines in England to date. This size of windfarms has been reached (and surpassed) almost only by offshore windfarms. The proposals therefore are in uncharted territory in England, and it must be expected that for proposals of this scale, the visual impacts will be so far reaching that they will be influenced by the viewing direction in combination with the prevailing weather conditions and the visual acuity of viewer/visual receptor, and even the curvature of the earth.

5.37 It is expected that the assessment of visual effects for onshore windfarms of this scale will be more complex than for offshore windfarms, as there are 360° views of the development.

5.38 SCC considers that these aspects will need to be fully considered in the ES, in particular with regards to heritage assets, designated landscapes, and promoted recreational Public Rights of Way ("**PROW**") routes.

5.39 It will therefore be necessary to assess the visual effects in different seasons and weather conditions.

5.40 SCC welcomes that any effects of moderate or greater significance will be considered significant. To this should be added that effects that would fall just under the significance threshold (i.e. minor-moderate effects) would be closely assessed in the narrative to establish whether they may need to also be considered significant.

5.41 It should further be noted that SCC considers that an accumulation of non-significant effects can in their accumulation result in significance. Given the nature of this development, this result is highly likely.

5.42 SCC considers that night-time effects of the scheme need to be fully assessed (not only in regard to aviation lighting) and notes that the wind turbines are proposed in an area with the lowest light pollution categories as a baseline (see Scoping Figure 9.5 Night Blight).

5.43 SCC considers that sequential and intra-cumulative effects on PROW, and in particular from promoted routes need to be fully assessed (see Scoping Figures 9.12 and 9.13, Appendix A Part 2).

5.44 When combining various receptor groups for any given viewpoint (as suggested in Table 9.2 of the Landscape and Visual ES Chapter), SCC expects that the highest-rating receptor group in terms of susceptibility and resulting sensitivity will be used to assess the significance of the effect.

Cumulative effects

5.45 Further clarification is required with regards to the assessment of cumulative effects. It is unclear, whether all coinciding development will be considered or whether it is proposed to only consider other windfarms, which would not be acceptable.

5.46 In the LVIA Methodology, there is no mention of, or explanation on, how intra-cumulative effects will be assessed. With regards to the definition of intra-project effects in Scoping Chapter 18, SCC disagrees that such effects would need to be effects from more than one topic area. Intra-project effects could also arise from seeing, for example, more than one array in the same view (with or without turning the head) or in sequential views.

5.47 It should also be noted that effects on other consented but not yet built residential areas will need to be assessed.

5.48 SCC considers that the susceptibility and the value of the landscape may change when considering cumulative effects with other developments. In particular, the susceptibility, i.e. the ability of the landscape to accommodate the Proposed Development without suffering undue harm could change, if there are several similar other schemes in the area.

5.49 SCC considers that the cumulative assessment should also reflect on the effect the layout and resulting pattern of wind turbines in the landscape.

Visualisations

5.50 SCC considers that the proposed 27 viewpoints are insufficient to adequately assess the visual effects of the scheme.

5.51 To give some examples for views within Suffolk, SCC considers that there should be at least additional viewpoint in the following locations:

i. Lark Bank, a raised recreational route along the River Lark, where views of the Suffolk array in close proximity together with the Norfolk and Cambridgeshire arrays (slightly further away) will need to be assessed (intra-cumulative effects).

ii. Towards the southern end of the Suffolk array from Burnt Fen Turnpike, looking east/north-east towards the Suffolk and Cambridgeshire arrays. This should also consider shade flicker and effects on residential visual receptors.

iii. At RSPB Lakenheath Fen, an additional viewpoint is required further west, where views of the Norfolk array would be experienced relatively closely and from where the Cambridgeshire and Suffolk arrays would be expected to also be visible beyond woodlands and other intervening structures (again, intra- cumulative effects will need to be assessed).

5.52 SCC further considers that it should be demonstrated through viewpoints that there would be no significant visual effects from Cambridge, Newmarket and Bury St Edmunds landmarks as well as from other Suffolk settlements and routes, which appear to have been scoped out in Table 9.2 of the ES Chapter Landscape and Visual. It is unclear what is meant by 'lack of clear views'. SCC considers that Table 9.2 requires review and that most identified receptors should be scoped in for representative viewpoint assessment. SCC would welcome further engagement with the Applicant in this matter.

Residential Visual Amenity Assessment (RVAA)

5.53 SCC considers that the Applicant needs to demonstrate that a 2km radius is sufficient as study area, given the scale of the scheme and the height of the turbines. SCC also considers that depending on the evidence provided by the Applicant, there should be flexibility to assess additional properties, should the need arise.

Aviation Lighting Assessment

5.54 It is unclear what baseline assessment is proposed in regard to aviation lighting.

5.55 SCC considers that the aviation lighting will need to be assessed against the existing light pollution/darkness of the night sky and how the required lighting would affect the dark skies of the area. Effects on wildlife and visual receptors will also need to be considered.

5.56 SCC considers that three dusk visualisations will not be sufficient to convey the effects of aviation (and other) lighting across the affected area. A map should be produced modelling the expected light pollution of the affected area resulting from the project.

Proposed approach to assessing implications for landscape designations

5.57 SCC considers that both national and local landscape designations will need to be fully considered. Before any assessments of effects on the National Landscape and its special qualities are scoped out, it would need to be demonstrated that there would be no significant effects.

Approach to Mitigation

5.58 While SCC welcomes the points made in Section 5.10, these appear to be design principles rather than a clear approach to mitigation. It would be welcome if there was a commitment from the Applicant to apply the mitigation hierarchy in full (including compensation) and to set out what is considered embedded mitigation (for example the iterative layout design), standard mitigation and what would be considered further enhancement and compensation.

Control Documents

5.59 SCC advocates for a two-stage approach to control documents, meaning that there should be a suite of outline control documents provided during the Examination, with detailed control documents being developed in accordance with these outline documents post-consent (during the Discharge of Requirements).

5.60 SCC expects that there will be a suite of control documents, including but not limited to a Construction Environmental Management Plan ("**CEMP**") with a Register of Environmental Actions and Commitments ("**REAC**"), Soil Management Plan ("**SMP**"), Landscape and Ecology Management Plan ("**LEMP**") (including appendices), and a Construction Traffic Management Plan ("**CTMP**"), amongst others.

5.61 For Landscape and Visual Matters, the outline LEMP should include, but not be limited to, outlining the responsible parties; a full AIA (including tree protection); Vegetation Retention and Removal Plans ("**VRRP**"); Reinstatement Plans; prescriptions and specifications for reinstatement, aftercare and monitoring. SCC would welcome further engagement with the Applicant on this matter.

Redmere Wind Farm Commitments Register

5.62 While SCC welcomes the two commitments relating to Landscape and Visual matters, regarding the agreement of viewpoints with statutory consultees (LVIA-02) and to use a ZTV to inform the LVIA (LVIA-01), there is a complete lack of commitments with regards to: landscape and visual baseline records; avoidance and minimisation of impacts and effects (application of the mitigation hierarchy) during construction, operation and decommission; reinstatement and landscape and visual mitigation and compensation; implementation; aftercare; monitoring; and long-term management.

5.63 SCC welcomes ECOL-03, the commitment to avoid Ancient Woodland but considers that this should also include veteran and ancient trees. Additional commitments should be included for the protection of Important Hedgerows under the 1997 Hedgerow Regulations.

5.64 ECOL-04 and ECOL-08 are too weak: 'where practicable' should be replaced with 'where possible'.

5.65 ECOL-07: SCC considers that an outline Landscape and Ecology Management Plan will need to be secured within a Requirement in the DCO. This needs to include prescriptions for landscape and visual matters as well as ecological measures.

5.66 Landscape and Visual matters will also need to be considered within and cross-referenced to the CEMP, CTMP, SMP, OEMP, and DEMP.

5.67 ECOL-09: An outline lighting plan and lighting design strategy should be secured during the Examination, and prior to the determination of the DCO.

5.68 SCC considers that an outline Shadow Flicker Protocol should be secured during the Examination, and prior to the determination of the DCO, rather than prior to operation.

Shadow Flicker Methodology

5.69 SCC welcomes the prospect of a Shadow Flicker Protocol and would seek a stronger commitment from the Applicant on this, including clear steps that would be taken, if complaints were received.

5.70 Further clarification is required as to the radius in which shadow flicker is anticipated to occur.

Figures

5.71 SCC welcomes that different scales are used for viewpoint at closer range and those further away. However, SCC considers that the 10km radius viewpoint sheets need to be split up further into manageable and meaningful segments at a more granular scale (such as 1:25,000, with an OS base). While the

overview Figures 9.7 to 9.10 provide is welcome, the scale of the map suggests a coverage with viewpoints that is not experienced in the field.

5.72 Likewise, the scale for Figures 9.11 Residential Properties Within 2km of the Indicative DCO Limits with Turbine Tip ZTV and 10.1 Shadow Flicker Study Area Shadow Flicker should be increased to avoid or reduce the overlap in the depiction of affected properties.

5.73 Figure 9.12 and 9.13 PROW with Turbine Tip ZTV (30km/10km) do not appear to include, or show clearly, all PROW and should therefore be renamed. It is unhelpful to present non-promoted PROW in a grey that is difficult to differentiate from the base map depiction of ditches and drains. Again, the scale is unsuitable to convey the information.

5.74 SCC considers it problematic that the Proposed Development would be located on Best and Most Versatile ("**BMV**") land as shown in Figure 15.3 Provisional Agricultural Land Classification.

5.75 For Figures 18.1a-c Cumulative Developments, it would be helpful if the type of development (housing/minerals and waste/solar/wind) could be identified through colour coding.

6 Lead Local Flood Authority

6.1 The EIA only appears to focus on the flood risk from rivers and does not consider the other flood risk i.e. surface water, reservoir, groundwater and foul. Therefore, a flood risk assessment should be submitted.

6.2 Due to the scale of the Proposed Development, strategies for the disposal of surface water should be developed for each site and type of development. The strategy should be in line with national and local policy/guidance.

7 Local Highway Authority

Grid Connection

7.1 SCC as the Local Highway Authority is concerned that the impacts of the construction of the grid connection in terms of the route and any improvements to existing infrastructure may be excluded from assessment (Scoping 2.4.4). Both generate significant amounts of Heavy Good Vehicles ("**HGV**") and worker vehicles and can involve disruptive road closure and damage to roads through use diversion routes. The scarcity of appropriate roads will result in lengthy diversion routes in this area. Of concern is access to Burwell Substation for large or heavy loads. SCC's understanding is that the is no viable special order movement route in terms of heavy load to Burwell or

north of Mildenhall due to restrictions on national and locally managed structures, nor is a route to Burwell shown in Figure 13.1a.

Data Collection

7.2 Care is advised when professional judgment is used instead of reliance on recently collected data. For a scheme of this significance and geographical scope, data surveys will be needed at specific locations as available data is likely to be scarce or dated. Whilst use of strategic traffic models is helpful on a regional basis, care needs to be taken if used as a proxy for capacity assessment of junctions or links.

Study Area

7.3 The study area is currently only shown as the strategic road network from the port of Great Yarmouth to the site. This should be expanded to include potential routes on the Local Road Network that may be used by construction traffic and workforce.

7.4 The title of Figure 13.1a suggests that the Traffic and Transport study area is restricted to the route between Great Yarmouth and the site via the A10. However, 13.1.3 of the scoping report refers to this as the Abnormal Indivisible Load ("**AIL**") transport route. For clarity, the Applicant should provide or confirm the scope of the Transport study area as presently this would appear to exclude, for example, roads such as the A1101 through Mildenhall. Unless sufficient measures are included within the CTMP to prohibit HGVs and workers using alternative routes, then the Traffic and Transport study area needs to be considerably enlarged.

Assumptions Regarding Construction Traffic

7.5 It is noted that the Applicant is considering use of borrow pits to provide construction material. Figure 11.4 only appears to show a small area of glaciofluvial deposits that could potentially be available for sand and gravel extraction. When HGV estimates are provided, it would also helpful if the assumptions in terms of the sources of aggregates and the possible use of borrow pits for disposal of material are detailed. Until such time as the borrow pit option is demonstrated as deliverable, SCC would assume that import and removal of material is included in HGV estimates as a realistic worst-case scenario. The origin / destination of material may also have a bearing on routing of HGVs.

Construction Traffic

7.6 The scoping report does not contain much information on HGV movements, construction workforce numbers and associated traffic or individual project traffic. Therefore, SCC is limited in providing advice on appropriateness or

otherwise of the local highway network for construction traffic. SCC would like early sight on proposed construction routes, so that officers can offer advice.

7.7 It is reasonable to expect detailed traffic forecasts in order to assess the magnitude of impacts on the highway network, e.g. driver delay, accessibility, road safety and network capacity. Detailed construction traffic forecasts could include:

i. Peak construction flows,
ii. Daily peak vehicle movements,
iii. HGV and Light Goods Vehicle proportions,
iv. Construction phasing,
v. Traffic routing.

7.8 The definition of HGV needs to be clarified. In other NSIPs, HGV has been taken to mean commercial vehicles in excess of 3.5 tonnes.

Abnormal Indivisible Loads

7.9 Reliance should not be placed solely on the Electronic Service Delivery for Abnormal Loads ("**ESDAL**") notification process with regards to AILs as this is 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 the worst-case to repair or replace substandard structures.

7.10 The description in the scoping report (2.1.4) and Figure 13.1a suggests 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.

7.11 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 route used by large and heavy loads.

Construction Workforce

7.12 Information on construction workforce is currently very limited. Workforce movements can represent a significant proportion of construction-related traffic and therefore needs to be properly reflected in the traffic forecasts.

7.13 A clear workforce travel strategy supported by evidence-based assumptions will need to be provided. This should include workforce numbers, shift patterns and the proposed measures to manage workforce travel.

7.14 Where timing of shift patterns is offered as embedded mitigation to avoid network peaks, care needs to be taken that the cumulative impact with other nearby projects such as Sunnica Energy Farm do not create a new network peak.

Transport Assessment and a Construction Traffic Management Plan

7.15 A Transport Assessment, Construction Traffic Management Plan and a Construction Worker Travel Plan will need to accompany the formal stakeholder consultation and must adequately consider the impacts of the additional traffic generated by the development, including any AILs. The Local Highway Authority would need to understand the traffic impacts from this development in isolation and cumulatively with other permitted or developing projects in the surrounding area.

7.16 The Transport Assessment should also consider the following in addition to implications of network peak periods:

i. Suitability of access from the highway, especially impacts such as vegetation removal to provide safe visibility. This will require surveys and site visits to provide sufficient detail to identify the consequential impacts.

ii. Collision Data

iii. Junction and Link Capacity

iv. Identification of feasible AIL routes to identify constraints such as weak bridges or road geometry.

7.17 Clarity will be required on the extent to which pre-commencement works can be undertaken, including the provision and use of temporary accesses, enabling works and associated construction traffic movements. Measures to facilitate project delivery should also be identified, including the scope and timing of any required Permanent Traffic Regulation Orders ("**TRO**"), temporary traffic management arrangements, protective provisions and other mechanisms for working collaboratively with the relevant highway authorities. Early engagement will be essential to establish the necessary consents, approvals, access arrangements and working requirements, manage interfaces with the existing highway network, and minimise potential risks to the project programme and delivery.

Management Plans and Control Measures

7.18 There does not appear to be any reference to controls on construction traffic generated by workers. Whilst acknowledging that the limited public transport options in most locations of this project make this challenging, SCC would expect the Applicant to identify practical measures to reduce worker trips by car and promote sustainable travel wherever possible, such as:

i. Car sharing,

ii. Crew minibuses,

iii. Public transport,

iv. Cycling and walking.

7.19 Control measures and management plans must include pre-commencement works within their scope as experience has shown that these can have significant adverse local impacts if not undertaken. Details on the Management Plans and Controls needs to be discussed and agreed with the LHA.

7.20 There is currently no information on working hours, including HGV delivery times. These should be included in the relevant management plans.

7.21 Management plans should clearly state how construction traffic will be monitored and measures to reduce impacts enforced. These should be the responsibility of the undertaker to deliver and not passed to contractors.

Site Access

7.22 The plans show that the site access point lies within the county of Cambridgeshire, however, it is not clear if this is the only site access proposed. Clarification on any potential additional site access points is required.

Existing Baseline

7.23 No details are provided on the extent or location of traffic surveys. This should be agreed with the LHAs prior to undertaking any surveys to avoid extraneous work.

Future Baseline

7.24 The number of proposed schemes in the north of the county makes undertaking future year assessments particularly complex, and so it is recommended that this is agreed with the local authorities at an early stage and may require numerous scenarios to be tested.

7.25 Regarding the Assessment criteria (Appendix C), some flexibility should be shown when applying the ISEP thresholds (9.2.1), noting that traffic surveys are subject to a level of uncertainty.

Relevant Highway Data

7.26 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.

7.27 When referencing road numbers and street names, these should be those used in the national street gazetteer.[7]

7.28 SCC has produced Highway guidance on NSIPs for Suffolk.[8] This has not been included in Appendix B.

7.29 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.[9]

7.30 Suffolk also has a thriving network of Roadside Nature Reserves[10]. 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.

8 Local Minerals and Waste Planning Authority

Minerals Safeguarding

8.1 Policy MP10 (Minerals consultation and safeguarding areas) of the Suffolk Minerals and Waste Local Plan (July 2020)[11] aims to protect economically important sand and gravel resources from being sterilised by non-mineral development.

8.2 Paragraph 3.5.7 of the Scoping Report identifies Mineral Safeguarding Areas and Consultation Areas under the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036. However, as part of the proposed development falls within Suffolk, reference should also be made to the Suffolk Minerals and Waste Local Plan (July 2020)[11] and its relevant safeguarding policies.

8.3 It is recommended that the Environmental Statement or supporting planning documents identify whether any part of the proposed development within Suffolk falls within a Minerals Consultation Area or Minerals Safeguarding Area. The extent of any overlap should be identified, and where relevant, a

[7] https://www.geoplace.co.uk/addresses-streets/street-data-and-services/national-street-gazetteer
[8] https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters
[9] https://www.quietlanessuffolk.co.uk/
[10] https://www.suffolk.gov.uk/planning-waste-and-environment/suffolks-countryside-and-wildlife/landscape-and-wildlife/suffolks-roadside-nature-reserves-interactive-map
[11] https://www.suffolk.gov.uk/planning-waste-and-environment/suffolk-minerals-and-waste-plan/adopted-suffolk-minerals-and-waste-local-plan

proportionate Minerals Safeguarding Assessment should be provided, taking into account the five-hectare threshold under Policy MP10.

8.4 Any assessment should consider the extent of safeguarded mineral resources affected and whether the proposed development would prevent or restrict their future extraction. This should take account of the proposed infrastructure, including turbine foundations, access tracks, the substation and associated works, distinguishing between temporary and permanent development where appropriate.

8.5 Where mineral resources could be affected, the assessment should consider whether extraction would be economically viable and practically or environmentally feasible, and whether prior extraction or use of minerals within the development would be possible.

Borrow Pits

8.6 Paragraphs 2.2.28 to 2.2.30 of the Scoping Report identify the potential for borrow pits to provide materials for the construction of access tracks, hardstanding and other infrastructure. Paragraph 11.4.3 confirms that a Borrow Pit Assessment will be undertaken and appended to the Environmental Statement.

8.7 Where borrow pits are proposed within Suffolk for the extraction of sand and gravel, these should be considered against Policy MP3 (Borrow pits) of the Suffolk Minerals and Waste Local Plan (July 2020)[11] and other relevant policies.

8.8 The assessment should include, but not be limited to, details of the proposed location and extent of any borrow pits, the anticipated quantities of material to be extracted, how the material would be used within the development and the proposed restoration arrangements.

Waste Safeguarding

8.9 Policy WP18 (Safeguarding of waste management sites) of the Suffolk Minerals and Waste Local Plan (July 2020)[11] aims to protect existing and permitted waste management facilities from development that could affect their continued operation.

8.10 It is recommended that the Environmental Statement or supporting planning documents identify any safeguarded waste management facilities within or near the proposed development in Suffolk, including the relevant safeguarding zones identified in the Suffolk Minerals and Waste Local Plan (July 2020)[11].

8.11 Where relevant, the assessment should consider whether the Proposed Development could affect the operation of these facilities, either directly or by introducing restrictions on their existing activities. The assessment should

demonstrate that the Proposed Development would not prejudice the continued operation of any affected waste management facilities.

9 Public Health

Health and Wellbeing Assessment

9.1 SCC notes that the Scoping Report proposes in paragraph 17.1.3 to scope out a standalone human health and wellbeing assessment. SCC also notes that the report identifies a range of pathways through which the Proposed Development may affect human health and wellbeing, with these matters proposed to be considered through the relevant topic assessments presented in the ES. This includes those set out in paragraph 17.1.1 of Hydrology, Hydrogeology, Geology and Peat, Traffic and Transport, Noise and Vibration, Climate Change and Greenhouse Gases, socio-economic effects, Tourism, Recreation and Land Use.

9.2 SCC does not object in principle to Human Health and Wellbeing being assessed through relevant specialist topic chapters rather than through a standalone Human Health assessment, provided that this approach can demonstrably deliver a comprehensive and integrated assessment of the relevant health pathways and their interactions. However, SCC consider that the Applicant's approach to Scoping as detailed in the Scoping Report and methodology as set out in Appendix C, do not sufficiently demonstrate how population health, including mental health and wellbeing, health inequalities, vulnerable groups and cumulative health effects will be systematically identified, assessed and reported across the ES. In particular, there is limited explanation of how wider determinants of health, mental wellbeing pathways and distributional effects will be considered, or how findings from individual topic assessments will be integrated to provide an overall understanding of the potential implications for health and wellbeing.

9.3 In line with the Rochdale Envelope principle of a cautious 'worst case' approach, SCC's primary recommendation is that PINS direct the Applicant to scope in Human Health and Wellbeing as a standalone assessment topic.

9.4 If, notwithstanding this recommendation, PINS accepts the Applicant's proposed integrated approach and concludes that Human Health and Wellbeing should be scoped out, SCC recommends that the following matters are addressed within the relevant specialist assessments and brought together within the ES. These matters also indicate important areas of scope that SCC would expect to inform a standalone Human Health and Wellbeing assessment should PINS agree with SCC's primary recommendation.

Integration of Health and Wellbeing Outcomes

9.5 The ES should include a dedicated Health and Wellbeing chapter. This is not intended to circumvent any decision PINS may make to scope out a standalone health and wellbeing assessment from the ES, but rather to provide a clear and integrated account of the relevant findings from the specialist topic assessments and their implications for population health and wellbeing.

9.6 The chapter should be supported by an appropriate health and wellbeing baseline. The baseline should identify potentially vulnerable populations, understand existing health inequalities and support consideration of receptor sensitivity across relevant topic chapters. Appropriate sources include Census data, Office for Health Improvement and Disparities ("**OHID**") profiles, the Indices of Multiple Deprivation, Joint Strategic Needs Assessments from authorities across the study areas, and other locally relevant quantitative and qualitative evidence.

9.7 The chapter should identify where key health and wellbeing pathways have been assessed, summarise the implications for population health, vulnerable groups and health inequalities, and cumulative effects, and detail clearly how health considerations have informed the overall conclusions of the ES.

Mental Health

9.8 A key concern for SCC in relation to the Proposed Development is the potential effect on community mental health and wellbeing. SCC considers that the Scoping Report does not sufficiently identifying and assess the potential effects.

9.9 Alongside the effects identified within the Applicant's proposed topic assessments, there are a range of pathways through which the Proposed Development may affect community mental health and psychological wellbeing which are omitted. These include prolonged uncertainty associated with the Proposed Development and perceived loss of control or influence over changes to the local environment. The Scoping Report and methodology appendix do not clearly identify or propose assessment of these or other potentially relevant pathways, nor explain how any differential effects on people who may be more vulnerable to prolonged uncertainty or environmental change will be identified and reported.

9.10 SCC considers that mental health and psychological wellbeing should be considered comprehensively across the relevant topic assessments. This should include consideration of direct and indirect effects, and interactions between different health determinants, such as the combined effects of construction noise, changes to traffic and movement, and reduced access to green space on stress, sleep, physical activity and mental wellbeing.

9.11 For relevant assessments, the baseline should include quantitative evidence of the mental health and wellbeing characteristics of the affected population, together with qualitative evidence capable of identifying community perceptions, concerns, priorities, existing healthcare service pressures and factors that may influence resilience and wellbeing. The baseline should also identify relevant vulnerable groups and consider the potential for existing pressures to interact with, or increase sensitivity to, the effects of the Proposed Development.

Health Inequalities and Vulnerable Groups

9.12 SCC is committed to the reduction of health inequalities. The Scoping Report includes some brief demographic and socio-economic baseline information in paragraphs 15.3.4-5 and identifies some receptors in table 17.1 that may experience effects arising from the Proposed Development, including local communities, recreational users and sensitive receptors. However, it is not currently clear how differential effects across population groups will be identified, assessed and reported consistently across the ES, or how population vulnerability, demographic characteristics and existing inequalities will inform receptor sensitivity, significance judgements and mitigation measures.

9.13 Assessment of population health should extend beyond consideration of average population effects and should examine whether certain groups are disproportionately exposed to, or less able to adapt to, particular impacts. This is particularly important where effects relate to access, mobility, noise, disruption, transport, recreation, community facilities or cumulative development pressures.

9.14 SCC recommends that the Noise and Vibration, Traffic and Transport, Landscape and Visual, and Socio-economics, Tourism, Recreation and Land Use assessments identify relevant vulnerable groups and consider whether the magnitude, duration or significance of effects differs from that experienced by the wider population. This should include, where relevant, children and young people, older people, disabled people, people with existing physical or mental health conditions, deprived communities, people reliant on public or community transport, and neurodivergent people.

9.15 The ES should explain how population vulnerability and health inequalities have informed receptor sensitivity, significance judgements and mitigation measures within each relevant assessment. It should be clear whether groups experiencing existing disadvantage are likely to experience disproportionately greater adverse effects, reduced access to benefits, or reduced ability to adapt to change.

Access to Services, Facilities and Community Infrastructure

9.16 SCC notes table 13.1, confirming that the Traffic and Transport assessment proposes to consider community severance and effects on access to facilities, services and amenities, and paragraph 15.1.2 bullet point 3, that effects on social infrastructure are proposed to be assessed within the Socio-economics, Tourism, Recreation and Land Use assessment. However, an interpretation of facilities, services, amenities and social infrastructure is not provided and thereby the Scoping Report does not clearly identify whether healthcare facilities, social care services and other health related infrastructure form part of that assessment, nor how effects on access to those services would be identified, assessed and reported.

9.17 SCC recommends that the assessments be informed by baseline evidence relating to existing accessibility of health and care services, including factors such as travel times, public transport availability, levels of car dependency and population groups that may already experience barriers to access. This would assist in establishing receptor sensitivity and determining whether particular communities may be more vulnerable to any changes in accessibility arising from the Proposed Development, particularly through construction and decommissioning from effects of any increased journey times, temporary diversions, community severance, reduced connectivity or altered route availability.

9.18 Where such pathways are identified, the Socio-economics, Tourism, Recreation and Land Use assessment should consider the implications for community wellbeing, use of social infrastructure and access to services, particularly for population groups that may already experience barriers to access.

Physical Activity, Recreation and Access to Open Space

9.19 SCC notes table 15.1, confirming that the Scoping will include assessment of tourism, recreation and Public Rights of Way, including potential effects arising from temporary closures, diversions, restrictions and disruption affecting access to social infrastructure. It is not currently clear however how the implications of these changes for physical activity, access to recreational opportunities and associated health and wellbeing outcomes will be assessed and reported.

9.20 SCC recommends that the Socio-economics, Tourism, Recreation and Land Use assessment includes physical activity baseline data, and considers the potential for construction, operation and decommissioning activities to affect the use and enjoyment of Public Rights of Way, recreational routes, green and blue spaces, tourism and recreation assets, and other publicly accessible

recreational environments. Particular consideration should be given to temporary closures, diversions, severance, changes in amenity, perceived safety, landscape change and alterations to the quality or attractiveness of recreational environments.

9.21 Where such pathways are identified, the assessment should explain whether changes in access, connectivity, amenity or recreational quality are likely to influence opportunities for physical activity, recreation and wellbeing amongst affected communities, and how these effects have informed the overall health and wellbeing conclusions.

Perceived Control, Uncertainty and Prolonged Disruption

9.22 SCC welcomes the inclusion of socio-cultural effects within the Socio-economics, Tourism, Recreation and Land Use assessment, including consideration of community identity, way of life, access to social infrastructure and amenity effects as set out in table 15.1.

9.23 It is not clear however whether the assessment will consider the potential implications of prolonged disruption, repeated phases of activity, cumulative infrastructure development and extended periods of environmental change for community wellbeing. Individual phases of construction or environmental change may have limited effects when considered in isolation, but prolonged or repeated disruption, particularly where other major infrastructure projects are occurring concurrently or sequentially, may result in communities experiencing sustained change with limited opportunity for recovery, respite and adaptation.

9.24 SCC therefore recommends that the Socio-economics, Tourism, Recreation and Land Use assessment considers whether prolonged construction activity, changes to community conditions, repeated project phases or interactions with other major infrastructure projects could result in wider effects on community wellbeing. Particular consideration should be given to communities experiencing concurrent or sequential infrastructure development, where the combined experience of disruption may differ from that associated with an individual project considered in isolation.

Community engagement and wellbeing

9.25 SCC recommends that where relevant to the assessment and management of effects on mental health and community wellbeing, the Applicant gives due consideration to SCC's Community Engagement and Wellbeing Supplementary Guidance Document[12]. The guidance identifies effective and collaborative engagement as important to procedural fairness and the

[12] https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf

protection of community wellbeing. These principles should inform the Applicant's approach to engagement and the identification, assessment and mitigation of community wellbeing effects throughout the project.

10 Public Rights of Way and Other Green Access

10.1 Suffolk County Council considers that the Environmental Statement should include a dedicated chapter for public rights of way, green access and recreation assessment, to ensure impacts are captured in a holistic manner, rather than split amongst different chapters.

10.2 The assessment should extend beyond definitive public rights of way to include open access land, permissive routes, promoted routes, informal access opportunities, green lanes and fen droves where these are used, or are likely to be used, for recreation, active travel, access to nature, landscape appreciation, and health and wellbeing purposes.

10.3 Public rights of way and green access infrastructure are not simply transport corridors. They are important public assets which provide opportunities for walking, wheeling, cycling and horse riding; support physical and mental health; facilitate access to nature; contribute to the visitor economy; and enable people to experience and enjoy Suffolk's landscapes. The Suffolk Green Access Strategy identifies these functions as a key part of the county's wider green infrastructure network.

10.4 The EIA scoping must of course include the operational impact of the wind farm as well as construction impact.

10.5 The Environmental Statement should therefore assess not only impacts on the physical access resource but also impacts on the quality of the recreational experience and amenity value available to users. This should include consideration of effects arising from visual intrusion, landscape change, loss of tranquillity, noise, lighting, construction activity, traffic movements, severance, diversion, reduced connectivity and cumulative effects. SCC's established position is that walkers, cyclists, equestrians and wheeled users experience these effects collectively rather than individually, and they should therefore be assessed holistically.

10.6 Particular consideration should be given to the fen drove network within and around the Order Limits. Whilst many of these routes may not be recorded on the definitive map, they may nevertheless form an important component of the area's green access network and recreational offer. The Applicant should assess the droves' use by walkers, cyclists and equestrians and evaluate any direct, indirect or cumulative effects. It is reasonable to assume at least some of the droves:

- Form part of the character and accessibility of the fens;
- Appear likely to support recreational walking, cycling and equestrian use;
- Function as informal green access infrastructure;
- Contribute to landscape appreciation and quiet recreation;

10.7 A particularly relevant point is the affected landscape is relatively remote fen countryside. Whilst it may not contain the concentration of recreational destinations found elsewhere in Suffolk, that increases rather than decreases the value of the green access resource. The ability to walk, wheel, cycle or ride through open fenland landscapes, experience tranquillity, wildlife and expansive views, and access nature close to home is itself an important recreational asset. This is especially relevant where alternative opportunities are limited.

10.8 For operational impacts, these are equally relevant to recreational users because they may persist for decades. The assessment should therefore consider:

- visual dominance of turbines;
- shadow flicker affecting users of routes;
- aviation lighting;
- effects on landscape character experienced from routes;
- changes in perception of tranquillity and remoteness.

10.9 And on cumulative effects, the applicant should assess impacts on recreational users arising from:

- Redmere itself;
- other energy infrastructure;
- transmission projects;
- BESS facilities;
- associated highway works.

10.10 A PRoW and other green access user experiences all infrastructure together, not project by project.

10.11 In accordance with the mitigation hierarchy, the Applicant should first seek to avoid adverse effects on public rights of way, green access opportunities and recreational amenity. Where effects cannot be avoided, appropriate mitigation measures should be provided. Where significant residual adverse effects remain, SCC would expect compensatory measures to be provided that deliver equivalent or enhanced public benefit.

10.12 Such measures could include the creation of new access opportunities, upgrades to existing routes, enhanced connectivity between communities and the countryside, improvements to multi-user routes, increased accessibility for wheeled users, enhancement of the fen drove network, or other green access improvements. Where physical mitigation cannot reasonably offset the harm arising from the development, SCC would expect the applicant to consider

appropriate financial contributions towards the improvement of public rights of way and green access infrastructure in the surrounding area.

10.13 Consistent with national planning policy, the objective should not simply be to minimise harm, but wherever practicable to leave the public rights of way and green access network in a measurably better condition than before development commenced. The applicant should therefore demonstrate how opportunities to enhance access, connectivity, recreation, active travel and access to nature have been identified and incorporated into the design of the project.

11 Socio-economics and Skills

11.1 SCC welcomes the Applicant's decision to scope in the potential effects of construction and decommissioning employment within the Local Study Area. SCC agrees that significant socio-economic effects may arise as a result of construction workforce demand and that these effects warrant detailed assessment within the Environmental Statement ("**ES**"). However, whilst the Scoping Report acknowledges the potential for significant effects, no mitigation measures are currently identified for construction employment. SCC considers that the ES should not rely solely on the assumption that employment creation represents an inherent benefit of the Proposed Development. Instead, the ES should demonstrate how workforce opportunities will be maximised and how adverse effects arising from labour market pressures will be managed, particularly in the context of multiple concurrent NSIPs and major infrastructure projects expected to generate demand for skilled labour across Suffolk and the wider region.

11.2 In accordance with SCC's socio-economic assessment guidance, the ES should provide a comprehensive assessment of workforce requirements across the construction, operational and decommissioning phases. This should include workforce forecasts, occupational and skills profiles, labour demand by discipline, workforce sourcing assumptions and assessment of home-based employment opportunities. SCC expects the ES to identify the anticipated proportion of the workforce sourced from within the Local Study Area, Suffolk, the wider East of England and beyond, together with justification of the assumptions applied. SCC welcomes the inclusion of cumulative effects within the proposed assessment and expects consideration of competition for labour, workforce displacement, skills shortages and impacts on existing employers and key sectors.

11.3 SCC notes that the baseline presented within the Scoping Report focuses principally on employment and economic indicators. SCC also expects the ES to include an appropriately proportionate skills and labour market baseline,

including consideration of workforce qualifications, sectoral employment patterns, occupations in demand, existing skills shortages and the capacity of education and training providers to support forecast workforce requirements. This will provide an important evidence base for assessing likely workforce availability and informing appropriate mitigation measures.

11.4 SCC notes that the only identified skills-related mitigation measure within the Scoping Report is the preparation of a Skills and Employment Strategy during the operational phase. Given that construction employment is expected to represent the most significant employment impact and exceed operational workforce requirements, it is unclear why skills mitigation is proposed solely for operation and maintenance activities. SCC considers that a Skills and Employment Strategy should be developed from the construction phase onwards and assessed as part of the mitigation framework. This should identify opportunities for local workforce participation, apprenticeships, training and wider skills development throughout the project lifecycle and align with SCC's Regional Skills Coordination Function and socio-economic guidance[13].

11.5 The ES should include a detailed assessment of construction and decommissioning workforce characteristics, including workforce numbers by phase and trade, duration of demand, workforce origins, accommodation requirements and any associated need for workforce accommodation strategies. SCC also expects the assessment to consider the capacity of local schools, colleges, universities and training providers to support forecast workforce demand and opportunities to develop local skills pipelines. The assessment should consider cumulative competition for labour and specialist skills, including the potential displacement of labour from existing employers, public services and other sectors already experiencing recruitment challenges.

11.6 SCC notes that the Scoping Report proposes to scope out significant effects on local businesses and economic sectors during operation on the basis that operational employment and expenditure are expected to be limited and dispersed. Whilst SCC acknowledges that operational workforce requirements are likely to be lower than those associated with construction, further justification is required. The Scoping Report identifies potential opportunities for businesses in sectors including engineering, maintenance, transport, accommodation and business services, and SCC therefore expects the ES to assess potential supply-chain opportunities, local business capacity and readiness to participate in project delivery, local procurement opportunities

[13] https://www.suffolk.gov.uk/asset-library/nsip-socioeconomic-effectnsips.v6.pdf

and indirect and induced economic effects across the construction, operational and decommissioning phases.

11.7 Overall, SCC considers that the proposed assessment methodology should be strengthened to provide a more comprehensive understanding of workforce, skills and supply-chain effects throughout the project lifecycle. The ES should clearly define and justify separate workforce and supply-chain study areas, reflecting workforce catchments, labour market geographies and anticipated supply-chain opportunities. SCC expects the assessment to demonstrate how local skills, employment and business opportunities will be maximised, how cumulative labour market impacts will be assessed and how appropriate mitigation measures will be secured to manage potential adverse effects.

From: Redmere Wind Farm
To: [redacted]
Subject: Fw: Police Response: Redmere Wind Farm: EN0110042
Date: 09 November 2026 12:59:22
Attachments: image001.png
image002.png
image003.png
image004.png

From: [redacted]@suffolk.police.uk>
Sent: 16 October 2026 09:39
To: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Cc: [redacted]@suffolk.police.uk>; [redacted]
[redacted]@suffolk.police.uk>
Subject: Police Response: Redmere Wind Farm: EN0110042

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

Redmere Wind Farm: EN0110042

Thank you for engaging with the police during the pre-application stage and through the Environmental Statement scoping process for the proposed Redmere Wind Farm development.

Nationally Significant Infrastructure Projects can place substantial and sustained demands on policing and wider service delivery. It is therefore important that the police are engaged from the outset, enabling us to provide timely advice on potential policing requirements and any mitigation that may be necessary.

The East of England is already hosting a significant number of major infrastructure schemes, including Sizewell C, the Great Grid Upgrade and other energy projects. For this reason the police has considerable experience of working constructively with developers to identify impacts, assess demand and support proportionate solutions. We would therefore ask that, as soon as they are appointed, the leads for traffic, logistics and workforce planning establish direct contact with the police. Early and continuing engagement will help develop a shared understanding of the likely impacts arising from HGV and Abnormal and Indivisible Load (AIL) movements, together with the size, composition and location of the construction workforce throughout the project.

Timely access to the following information is essential if policing impacts are to be properly assessed and addressed. For example, the police do not have a dedicated AIL escort team and so any significant or sustained requirement for police escorts would therefore need to be identified early, modelled carefully and supported by an appropriate, deliverable and funded mitigation package.

SC requires the following information in order to assess and model any potential impacts from the development:

- A breakdown of all forecast AIL movements (cable drums, plant, welfare cabins etc), including loaded and unloaded vehicle dimensions.
- All proposed AIL routes
- Likely port or pick up points

Proposed delivery schedule

We recognise that Redmere Wind Farm remains at an early stage and that some details, such as ports of origin, final AIL routes and construction traffic arrangements, may not yet be available. Nevertheless, it is important that appropriate contacts and engagement arrangements are established now, with information shared progressively as the proposals develop. This will allow the police to contribute effectively, avoid preventable delays and ensure that policing requirements are reflected in the project's planning and delivery.

We look forward to working collaboratively with you to ensure that the safety and security of existing and emerging communities remain central to the project. Early, open and sustained engagement with the police is key to achieving a successful outcome for all parties.

I thank you in advance for confirmation of receipt of this communication.

Regards,

Leigh Jenkins
Business Liaison Manager
FUTURES HUB
INNOVATE & IMPROVE
Suffolk Constabulary
Police Headquarters
Portal Avenue, Martlesham, IP5 3QS
Tel: 01473 613888
Website: www.suffolk.police.uk
Social media:



This e-mail carries a disclaimer
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DPC:76616c646f72

UK Health Security Agency

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www.gov.uk/ukhsa

Your Ref: EN0110042
Our Ref: 96329

Ms Karen Wilkinson
Senior EIA Advisor
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

29 October 2026

Dear Ms Wilkinson

Nationally Significant Infrastructure Project
Redmere Wind Farm - EN0110042
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). The applicant has not proposed a standalone human health chapter, instead stating that the risks will be appropriately assessed within individual chapters. UKHSA would generally agree with this approach considering that the proposed assessment methodology appears appropriate within individual chapters. These sections 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 and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

BESS System

The applicant proposes a Battery Energy Storage System within the submitted documentation; however, location details have not been provided at this stage.

Recommendation:

The risk assessment should be updated to identify and re-evaluate any major accidents, hazards, or failure scenarios relating to the BESS, with consideration to its proximity and potential impacts on previously identified receptors. Given the potential for significant public health effects, these matters should be scoped into the ES and assessed accordingly.

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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

EMF
The applicant has scoped out EMFs on the basis that "underground cabling and industry standard design measures will ensure that EMF levels remain well below applicable exposure limits at publicly accessible locations".

Recommendation:
UKHSA requests that the proposer confirms either that the project does not contain any EMF sources that may have a potential public health impact; or ensure that an appropriate assessment of the possible impact is included in the ES. 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 following advice document produced by Public Health England, a UKHSA predecessor body:
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

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Enquiries to:	Charlotte Waugh (WSC)
	[redacted]
Email:	[redacted]@westsuffolk.gov.uk

Date: 23 October 2026

For the attention of Karen Wilkinson

redmerewindfarm@planninginspectorate.gov.uk

Dear Ms Wilkinson

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 Redmere Wind Farm (the proposed development). Response of West Suffolk Council (WSC) to the Scoping Opinion submitted to the Secretary of State.

Thank you for the opportunity to comment on the Vattenfall Wind Power Limited, Environmental Impact Assessment Scoping Report dated 1 October 2026. This is West Suffolk Councils response to the consultation, including wind turbines and infrastructure within the District boundary.

The following text sets out the specialist consultation responses which form the basis of West Suffolk Council (WSC) comments upon the submitted Scoping Opinion. It is understood that Suffolk County Council will respond separately and cover matters such as highways, public rights of way, flooding and drainage, public health, minerals and waste. As such, this response will cover matters only within the specialisms of the District Council. It is understood that adjoining host district and county councils will be responding separately.

West Suffolk Council Ecology Response

"Chapter 6: Biodiversity and Nature Conservation

We are pleased to note that an Ecological Impact Assessment (EcIA) Report will be included in the EIA, which should be informed by the outcome of the results of all detailed ecological surveys identified in the initial assessment. The scheme should adhere to the ecological mitigation hierarchy and avoid impacts in the first instance. Where impacts cannot be avoided, mitigation measures will need to be identified, and if they are not sufficient compensation provided. All ecological surveys and reports should be produced in accordance with current best practice and be carried out by a suitably qualified and experienced ecologist. The proposed methodologies described in section 2 of Appendix C appear acceptable.

Regarding ecological baseline conditions (section 6.3), the list of ecological data sources appears appropriate, and we are pleased to note includes the relevant environmental record centres. We are satisfied that all relevant national, international and locally designated sites have been identified in tables 6.1 and 6.2.
We note that field surveys are ongoing and include UKHab (BNG) surveys, condition assessments as well as invasive non-native species.

Section 6.4 (Scoping Determination of Potential Likely Significant Effects) and the associated tables 6.3 and 6.4 which present the scoping determination of potential LSE for the Biodiversity and Nature Conservation assessment during the construction, decommissioning and operational phases, appear acceptable.

<u>Biodiversity Net Gain (BNG)</u>

It is important to note that from 02 November 2026, biodiversity net gain (BNG) will be mandatory for nationally significant infrastructure projects (NSIPs) in England. We welcome the applicant's commitment, as set out in section 2.5 of Appendix C (EIA Methodologies) "that all BNG proposals will be developed in consultation with the relevant councils".

<u>Chapter 7: Ornithology</u>

Table 7.1 highlights the close proximity of Breckland SPA to the proposed development location (529 metres) and therefore the potential for adverse impacts to the qualifying species including stone curlew, nightjar and woodlark. However, we welcome the inclusion of breeding stone curlew surveys as set out in section 7.3.13 of the report.

We note the proposed field surveys have already commenced but at different times for Redmere North (April 2025) and Redmere South (Oct 2025); it is important that all necessary bird surveys, including flight activity surveys, are fully completed in accordance with the current best practice and carried out by suitably qualified and experienced ecologists. This is essential to inform the collision risk modelling and assessment of potential displacement and barrier effects.

Section 7.4 (Scoping Determination of Potential Likely Significant Effects) and the associated tables 7.2 and 7.3 which present the ornithology scoping determination of potential LSE during the construction, decommissioning and operational phases, appear acceptable.

The proposed methodologies described in section 3 of Appendix C, including identification of important ornithological features, assessment of likely significant effects and approach to mitigation, appear broadly acceptable, noting that we fully anticipate the need for post-consent monitoring to be required, given the highly sensitive location of the proposed scheme.

We note that the ornithological best practice guidance referred to in Appendix B relies heavily upon that produced by NatureScot rather than Natural England; it will therefore be important that NE is engaged at the earliest opportunity to ensure that they support the use of NatureScot's guidance in this instance.

Habitats Regulations Assessment (HRA)

We note in section 6.1 that an HRA will be undertaken to consider the potential effects of the Proposed Development on the National Site Network and that the HRA will be prepared as a separate assessment from the EclA, although the assessments will be informed by a common evidence base where relevant.

We note in section 2.6 of Appendix C that the European sites selected to be included within the HRA will be agreed in consultation with Natural England. As highlighted in the RSPB's response to this consultation, it is important that the applicant is aware of The Third Network Review of SPAs (Phase 2) published by the JNCC in 2025 which identifies and advises changes to the SPA network which are pertinent to the sites affected by the proposed development."

Suffolk Wildlife Trust, Wildlife Trust for Beds, Cambs & Northants, and Norfolk Wildlife Trust Joint Response

"Given the scale and location, we have shared our concerns with neighbouring Wildlife Trusts, and we submit this as a joint response.

The proposed location, on the border between Suffolk, Norfolk, and Cambridgeshire, is surrounded by areas of significant biodiversity value including internationally, nationally, and locally designated sites as well as priority habitats and a range of protected, priority, and notable flora and fauna. While Suffolk, BCN, and Norfolk Wildlife Trusts support the transition to net zero, it is imperative that the delivery of clean energy positively contributes towards nature recovery, tackling the climate crisis and biodiversity crisis together.

We share our support for the detailed comments made by the RSPB (dated 12th October 2026). These raise concerns for a wide-range of potential impacts including significant effects to internationally and nationally important sites alongside land functionally linked to these sites, protected and notable species, and priority habitats. The need to consider impacts to peat soils, an important carbon store, is also included in the RSPB response. We share these concerns and expect future reporting to consider the matters raised by the RSPB alongside those matters noted in the provided scoping report.

The relevant Local Nature Recovery Strategies (LNRS) (Suffolk, Norfolk, and Cambridgeshire & Peterborough) identify land within the draft order limits as areas where habitat creation and enhancement should be prioritised. Specifically, the areas identified include the creation of lowland fen, lowland wet grassland, and river, riparian and floodplain habitat creation. The LNRSs should form a major part of the design process, and the EIA should consider that land within LNRS potential measures be afforded a level of protection akin to priority habitat (given the potential measures would deliver habitat likely to meet criteria as priority habitat).

Across all three counties, the Redmere Windfarm, and associated Chatteris Windfarm, should seek to deliver the aims of the relevant LNRS; failing this and as a last resort, the proposals must not hinder future delivery of any measures proposed by the LNRS."

RSPB Response

"The EIA should provide sufficient survey evidence and impact assessment to determine effects on designated sites, functionally linked land, legally protected species, priority habitats, peat soils and ecological connectivity. The assessments should consider direct, indirect, cumulative and in-combination effects and identify appropriate avoidance, mitigation and compensation measures where required.
Ornithology and Designated Site Considerations

The Environmental Impact Assessment should:

- *Assess potential effects on the integrity of the Breckland SPA, including both direct and indirect impacts arising from the proximity of turbines to the designated site.*
- *Consider potential impacts on Stone-curlew, including collision risk, displacement, barrier effects and any reduction in the suitability of breeding and foraging habitat. The assessment should take account of the proximity of the development to known nesting locations, other areas suitable for nesting and the species' use of foraging areas at considerable distances from breeding sites. Liaison with RSPB regarding existing Stone-curlew data is recommended.*
- *Identify and assess impacts on areas used by Marsh Harrier, Common Crane and wintering Whooper Swan including habitat loss, displacement and collision risk from the project both alone and in-combination with other projects.*
- *Assess the potential for impacts on Common Crane and wintering swan movements between key sites, including consideration of the apparent flight corridor between RSPB Lakenheath Fen and the Ouse Washes SPA.*
- *Consider whether the development area supports functionally linked land associated with nearby internationally important wetland and bird sites, including the Ouse Washes SPA.*

<u>Nature Conservation and Habitat Considerations</u>
The Environmental Impact Assessment should:

- *Assess impacts on land immediately adjoining RSPB Lakenheath Fen, including any effects on reserve management, ecological connectivity and opportunities for future habitat creation.*
- *Recognise and assess the ornithological importance of the wider Lakenheath area, including habitats known to support Bittern, Common Crane and Marsh Harrier, irrespective of current statutory designation status.*

<u>Soil, Peat and Carbon</u>
The Environmental Impact Assessment should:

- *Include a robust assessment of peat soils present within the development footprint and associated infrastructure corridors.*
- *Assess the potential for long-term damage to peat soils arising from construction, drainage alteration and operational activities, together with the implications for carbon storage and greenhouse-gas emissions.*

<u>UK SPA Review</u>
The Third Network Review of SPAs (Phase 2) 1 published by the JNCC in 2025 identifies advises changes to the SPA network which are pertinent to the sites affected by the proposed developments. Specifically:

- *Lakenheath Fen: Classification as a new SPA site for both breeding and non-breeding crane. The SPA review also considers 18 new sites for breeding bittern and 6 new sites for non-breeding bittern. Given that Lakenheath currently supports 5.5% of the booming male bitterns it is highly likely that Lakenheath Fen is one of those un-named sites.*
- *Breckland SPA: The addition of breeding and non-breeding Kingfisher as features, and boundary extensions to the SPA for breeding Nightjar and breeding Woodlark.*
- *Ouse Washes SPA: 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;*

Therefore, consideration should be given to both these additional features and the potential for boundary extensions. A failure to do so would constitute a failure to adequately consider them in the context of the recognition that they meet the SPA qualification guidelines. Ultimately there would be a risk of future application of Regulation 65 of the Habitats Regulations (Review of existing decisions and consents) to any consenting decision made which failed to factor in these proposed changes.

It should also be noted that Stallode Wash (Lakenheath) was identified in the Natural England Detailed Notification Review of 2013 with extension of the site to include the whole RSPB reserve, the inclusion of new habitat and species features and the identification of the site as supporting Annex 1 species – bittern, marsh harrier and crane in nationally significant numbers as thus qualifying as an SPA."

West Suffolk Council Environment Team Response

"Contaminated Land:

The topic of contaminated land is dealt with in the Hydrology, hydrogeology, geology and peat chapter, noting that this chapter also deals with a number of topics dealt with by other regulatory agencies, such as the Environment Agency.

The EIA Scoping report states that there is limited potential for contaminated land, but confirms that this topic will be scoped into the Environmental Statement for the construction stage. Relevant legislation and methodology are set out in Appendices B and C.

We are in agreement with the Scoping Report that the potential for Contaminated Land in the West Suffolk administrative area is relatively limited, however, we welcome the inclusion of contaminated land in the ES and we are in agreement with the proposed methodology.

Air Quality

The topic of air quality is dealt with in the Other Environmental Topics chapter. Two aspects of air quality are considered, being the additional traffic through the construction phase and the dust generated during construction activities. For the operational phase, air quality is not considered relevant due to the low traffic movements generated and the absence of any direct emissions from the wind farm.

Changes in concentrations of pollutants from vehicle movements has been scoped into the ES. The details of the air quality assessment cannot be finalised until the traffic modelling has been completed, however, broad methodology is provided confirming the assessment will be undertaken in line with appropriate guidance where vehicle movement thresholds are met. I am in agreement with the inclusion within the ES of an air quality assessment from vehicle movements and I am satisfied with the approach outlined.

In terms of impacts from dust from the construction process, the scoping report confirms that this will be scoped out as any impacts will be temporary and localised and can be effectively controlled through the use of standard good practice methods. I am in agreement with this conclusion and satisfied that dust from construction can be scoped out on the basis that best practice will be adopted during the construction process."

West Suffolk Council Private Sector Housing and Environmental Health Response

"I have reviewed the ERM 'EIA Scoping Report' (Planning Inspectorate Reference: EN0110042, Date September 2026, Reference 0824465) and can confirm I am satisfied that this has appropriately scoped out matters within my remit i.e. noise / other potential nuisance e.g. vibration, dust, light pollution etc from inclusion in an Environmental Statement (ES).

These matters can appropriately be scoped out of an ES because these matters will be subject to further specific and separate consideration / assessment as appropriate i.e. by way of a Noise Impact Assessment (NIA), fixed external mechanical plant / equipment noise emission criteria, a Construction Environmental Management Plan (CEMP), an Operation
Environmental Management Plana (OEMP) for operational noise mitigation, including turbine low noise modes, selection of quieter turbines etc, a lighting strategy / plan etc.

In this context, I am satisfied the EIA Scoping Opinion Report is satisfactory subject, of course, to these additional assessments etc being forthcoming for review / comment at the appropriate design / implementation stage(s) of the proposed development in line with the 'Redmere Wind Farm Commitments Register' also submitted with this Scoping Opinion."

West Suffolk Council Landscape Team Response

"I've had a good look through all of the available documents and don't see anything that appears to have been missed or anything that stands out as incorrect in terms of the proposed methodology, which appears to follow relevant guidance.

Welcome the need for further engagement including agreement to viewpoints."

West Suffolk Council Conservation Team Response

"It is not possible to comment on the potential impact of the proposal and the mitigation on Heritage assets at this stage, but it is noted none of the heritage assets whether designated or non-designated identified have been scoped out of the EIA.

We are advised the approach proposed to assess impacts on heritage assets will be in accordance with relevant national policy and current best practice guidance.

The extent of study will involve the identification and assessment of non-designated heritage assets within 1km of the site and designated heritage assets within 10km of the site.

In addition, a number of heritage assets of the highest significance have been identified for consideration on an exceptional basis where the ZTV indicates potential for intervisibility with the proposed development. Finally, a cumulative effects assessment will be undertaken.

Given the height of the proposed structures and the character of the landscape, the visibility and possible impact of the proposed development has the potential to be far reaching. Consequently, in addition to the methods of identification and assessment of impacts indicated, consideration should also be given to using a crane or balloons erected at the height of the proposed turbines to enable a better understanding of the impact of the proposals on setting.

It is not possible to confirm whether the viewpoints identified are sufficient at this stage."

West Suffolk Council general comments

It is generally considered that the submitted Scoping Report and attached Appendices provide an appropriate scope for the Environmental Statement (ES). Specialist consultee comments are enclosed for fullness.

- WSC remains concerned that the grid connection, whilst specified as off-site at Burwell Main sub-station, is not shown, with no details of the cable route provided. Given the length of this route, the reliance of this project on that connection and its resultant impact on many of the matters discussed above, but particularly landscape and ecology, WSC consider it necessary for these details to be submitted and considered at an early stage. Without receipt of this information WSC is unable to understand if the route will cross WSC's boundary, have an impact on it or undertake a full assessment of the project. Officers are aware of other projects with the same connection point and this may also have an impact on its acceptability and cumulative impact.

- The site is intersected by a recently laid Anglian Water pipeline connecting Bexwell to Bury St. Edmunds. This is another constraint on the site which needs to be mapped.

- In relation to Section 2, WSC considers that the Environmental Statement should clearly explain the proposed management and use of the substantial areas of land within the Order Limits that would not be occupied by turbines,

substations, BESS facilities, compounds, access tracks, hardstanding or other associated infrastructure. WSC would particularly welcome clarification on whether agricultural use, including on areas identified as Best and Most Versatile agricultural land, would be retained during the construction, operational and decommissioning phases of the proposed development. Details should also be provided on any proposed fencing, enclosure or boundary treatments, and the extent to which these would be applied across the site.

- The Council notes the requirement under the EIA Regulations for applicants to consider and assess "reasonable alternatives". From a policy perspective, the Council also notes paragraph 4.3.29 of the Overarching National Policy Statement for Energy (EN-1), which 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 the limited engagement with the Applicant to date, ahead of the submission of the DCO application the Council would welcome further information regarding the reasonable alternatives that have been considered. In making these comments, the Council has particular regard to the Government's pre-application advice on Environmental Impact Assessment for Nationally Significant Infrastructure Projects. This guidance identifies, amongst other matters, the inclusion of:

  "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 the preferred option(s) will be selected, taking account of effects on the environment."

  The Council therefore encourages the Applicant to provide a robust explanation of the alternatives assessment undertaken to date, together with the methodology used to identify and discount alternative options.

- WSC notes that the site is in close proximity to RAF Lakenheath and RAF Mildenhall airbases and within their military aerodrome traffic zone. It is understood the DIO is responding separately to this consultation. Given the operational importance of the bases, particularly RAF Mildenhall it will be essential that the ES demonstrates, through MoD consultation, whether turbine height and location could affect military flying activity, radar performance, safeguarding requirements, or future operational flexibility at both.

Yours sincerely,

Charlotte Waugh

Principal Planning Officer
West Suffolk Council

From: Redmere Wind Farm
To: [redacted]
Subject: FW: EN0110042 Redmere Wind Farm Scoping Opinion Witchford Parish Council response
Date: 10 November 2026 08:58:50

From: [redacted] <clerk@witchfordparishcouncil.gov.uk>
Sent: 08 October 2026 10:52
To: Redmere Wind Farm <redmerewindfarm@planninginspectorate.gov.uk>
Subject: EN0110042 Redmere Wind Farm Scoping Opinion Witchford Parish Council response

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Dear Sirs,

Witchford Parish Council discussed your letter dated 1st October 2026 regarding the Redmere Wind Farm Scoping Opinion EN0110042.

Witchford Parish Council advises that the Witchford Neighbourhood Plan includes Policy CC5 'Supporting renewable energy infrastructure' which includes references to wind turbines. A copy of the Witchford Neighbourhood Plan can be found via this link

https://eastcambs.gov.uk/planning-and-building-control/planning-policy-and-guidance/neighbourhood-planning/neighbourhood-8

For and on behalf of Witchford Parish Council
Mrs A Hodges
Clerk to Witchford Parish Council
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