Longmarsh Green Energy

EPL Norfolk Limited

Scoping Report

Appendix B: Initial Commitments Register

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1 Initial Commitments Register

1.1.1 This Appendix outlines the initial commitments from the main body of the Scoping Report. The Commitments Register will be updated at the Environmental Statement (ES) stage of the Environmental Impact Assessment (EIA) to reflect the detailed technical assessments and included within the Development Consent Order (DCO) Application.

1.1.2 Please refer to **Table B1-1** below for details of commitments at the Scoping stage, their relevant Proposed Development phase, securing mechanism and responsible party.

Table B1-1: Initial Commitments Register

Design Commitments
The overarching design commitments are as follows: • Maintaining a minimum distance of 30m between residential properties and other amenity sensitive receptors (e.g. parish halls, schools, General Practitioner (GP) surgeries) and the solar panels. • Locating any inverters / transformers at least 100m from residential properties and other amenity sensitive receptors (e.g. parish halls, schools, General Practitioner (GP) surgeries). • Providing a separation distance of at least 300m from major built infrastructure, including the Data Centre Campus / Battery Energy Storage Systems (BESS) Units / Substation in the Western Site and the BESS Units and Substation in the Eastern Site. • Working with residents nearest to the Proposed Development to develop site-specific mitigation measures, including appropriate planting, screening and landscape treatments. • Maintaining a minimum buffer of 100m between the Islington Heronry Site of Special Scientific Interest (SSSI) and any above-ground infrastructure. • Developing opportunities for new and enhanced habitats that support local wildlife and strengthen ecological networks. • Using appropriate separation distances, landscape screening and design measures to limit any visual effects for users of Public Rights of Way (PRoW). • Exploring opportunities to improve connectivity within the wider Rights of Way network, including new permissive path links. • Developing a traffic strategy that specifies routes for construction Heavy Goods Vehicles (HGVs) that avoid local villages, including Tilney St Lawrence, Barton Bendish and Fincham, where possible. Routing operational traffic associated with the Data Centre Campus away from Tilney St Lawrence.

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
Management plans							
1	An Outline Construction Environmental Management Plan (oCEMP) will be produced to implement best practice and mitigation measures to control and minimise environmental effects during construction.	No	Construction	Noise and vibration, air quality, biodiversity, landscape and visual, built heritage, buried heritage, water environment, agricultural land and soils, greenhouse gases and climate change, socio-economics and population, human health, land quality, lighting, major accidents and	DCO Requirement	Applicant / Contractor	Chapter 4: Initial Description of the Proposed Development, Chapter 7: Noise and Vibration, Chapter 8: Air Quality, Chapter 9: Biodiversity, Chapter 10: Landscape and Visual, Chapter 11: Built Heritage, Chapter 12: Buried Heritage, Chapter 14: Agricultural Land and Soils Chapter 13: Water Environment, Chapter 15: Greenhouse

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
				disasters and waste and materials			Gases and Climate Change, Chapter 16: Socio-economics and Population and Chapter 17: Technical Aspects to be 'Scoped Out'
2	An Outline Construction Traffic Management Plan (oCTMP) will be produced, which will include details on construction logistics and worker travel plans.	No	Construction	Transport and access, noise and vibration, air quality, biodiversity, built heritage, buried heritage, agricultural land and soils, greenhouse gases and climate change, socio-economics	DCO Requirement	Applicant / Contractor	Chapter 6: Transport and Access, Chapter 7: Noise and Vibration, Chapter 8: Air Quality, Chapter 9: Biodiversity, Chapter 11: Built Heritage, Chapter 12: Buried Heritage, Chapter 14: Agricultural Land and Soils,

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
				and population and human health			Chapter 15: Greenhouse Gases and Climate Change, Chapter 16: Socio-economics and Population and Chapter 17: Technical Aspects to be 'Scoped Out'
3	An Outline Operational Environmental Management Plan (oOEMP) will be produced, which will set out measures to manage environmental effects during the operation and maintenance phase.	No	Operation and maintenance	Noise and vibration, biodiversity, landscape and visual, built heritage, water environment, agricultural land and soils, greenhouse gases and climate change,	DCO Requirement	Applicant / Operator	Chapter 7: Noise and Vibration, Chapter 9: Biodiversity, Chapter 10: Landscape and Visual, Chapter 11: Built Heritage, Chapter 13: Water Environment, Chapter 14: Agricultural Land

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
				socio-economics and population, EMF, human health, land quality, major accidents and disasters and waste and materials			and Soils, Chapter 15: Greenhouse Gases and Climate Change, Chapter 16: Socio-economics and Population and Chapter 17: Technical Aspects to be 'Scoped Out'
4	An Outline Decommissioning Environmental Management Plan (oDEMP) will be produced, which will set out measures to manage environmental effects during the decommissioning phase.	No	Decommissioning	Noise and vibration, air quality, biodiversity, landscape and visual, built heritage, buried heritage, water environment, agricultural land and soils,	DCO Requirement	Applicant / Contractor	Chapter 7: Noise and Vibration, Chapter 8: Air Quality, Chapter 9: Biodiversity, Chapter 10: Landscape and Visual, Chapter 11: Built Heritage, Chapter 12: Buried Heritage, Chapter 13:

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
				greenhouse gases and climate change, socio-economics and population and human health, land quality, lighting, major accidents and disasters and waste and materials			Water Environment, Chapter 14: Agricultural Land and Soils, Chapter 15: Greenhouse Gases and Climate Change, Chapter 16: Socio-economics and Population and Chapter 17: Technical Aspects to be 'Scoped Out'
5	An Outline Decommissioning Traffic Management Plan (oDTMP) will be produced, which will include details on decommissioning logistics.	No	Decommissioning	Transport and access, noise and vibration, air quality, biodiversity, built heritage, buried heritage, agricultural	DCO Requirement	Applicant / Contractor	Chapter 6: Transport and Access, Chapter 7: Noise and Vibration, Chapter 8: Air Quality, Chapter 9: Biodiversity, Chapter 11: Built

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
				land and soils, greenhouse gases and climate change, socio-economics and population and human health			Heritage, Chapter 12: Buried Heritage, Chapter 14: Agricultural Land and Soils, Chapter 15: Greenhouse Gases and Climate Change, Chapter 16: Socio-economics and Population and Chapter 17: Technical Aspects to be 'Scoped Out'
6	An Outline Landscape and Ecology Management Plan (oLEMP) will be produced, which will set out the short and long-term measures	No	Operation and maintenance	Biodiversity, landscape and visual, agricultural land and soils, greenhouse gases and climate	DCO Requirement	Applicant / Landscape Architect / Project Ecologist	Chapter 9: Biodiversity, Chapter 10: Landscape and Visual, Chapter 14: Agricultural Land and Soils,

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	and practices that will be implemented to establish, monitor, and manage landscape and ecology mitigation and enhancement measures.			change, glint and glare, human health, land quality and major accidents and disasters			Chapter 15: Greenhouse Gases and Climate Change and Chapter 17: Technical Aspects to be 'Scoped Out'
7	Biodiversity Net Gain (BNG) Plan which will demonstrate how the Proposed Development will achieve the required minimum 10% net gain.	Yes	Operation and maintenance	Biodiversity	DCO Requirement	Applicant / Project Ecologist	Chapter 9: Biodiversity
8	An Outline Soils Management Plan (oSMP) will be produced, which will follow the principles of good practice to maintain the physical properties	Yes	Construction / Operation and maintenance / Decommissioning	Water environment, agricultural land and soils and land quality	DCO Requirement	Applicant / Contractor / Operator	Chapter 13: Water Environment, Chapter 14: Agricultural Land and Soils and Chapter 17: Technical

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	of any soil that will be disturbed.						Aspects to be 'Scoped Out'
9	An Archaeological Mitigation Strategy (AMS) will be produced to set out the overarching framework, regulatory context, baseline data, and mitigation strategy for managing archaeology during construction.	Yes	Construction	Buried heritage	DCO Requirement	Applicant / Contractor / Project Archaeologi-st	Chapter 12: Buried Heritage
10	An Outline Battery Safety Management Plan (oBSMP) will be produced to set out the mitigation, management and monitoring measures required to ensure safety risks of the BESS	Yes	Operation and maintenance	Air quality, water environment, human health, land quality and major accidents and disasters	DCO Requirement	Applicant / Project Fire Safety Consultant	Chapter 8: Air Quality, Chapter 13: Water Environment and Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Units are reduced to as low as reasonably practicable.						
11	Outline Travel Plan (oTP) which will set out measures to encourage sustainable means of transport.	Yes	Operation and maintenance	Transport and access, greenhouse gases and climate change and human health	DCO Requirement	Applicant / Operator	Chapter 6: Transport and access, Chapter 15: Greenhouse Gases and Climate Change and Chapter 17: Technical Aspects to be 'Scoped Out'
12	Outline Drainage Strategy (oDS) will be produced to establish the core principles, parameters and framework for managing surface water and foul drainage. This will specify appropriate	No	Operation and maintenance	Water environment and land quality	DCO Requirement	Applicant / Project Flood Risk and Drainage Consultant	Chapter 13: Water Environment and Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	drainage features, designated drainage areas and containment measures, including bunding, where required, to manage, attenuate and, where appropriate, treat surface water run-off and reduce the potential for impacts to underlying soils and groundwater.						
13	An Outline Operational Lighting Strategy (oOLS) will be produced to set out the details of the proposed permanent lighting installations (including location, directionality, type and heights), duration and timing	No	Operation and maintenance	Greenhouse gases and climate change and lighting	DCO Requirement	Applicant	Chapter 15: Greenhouse Gases and Climate Change and Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	and sensitive receptors identified, and ensure that operational lighting will be designed and installed in line with relevant standards and guidance.						
Further specialised technical reporting to be undertaken for the DCO Application for aspects 'scoped out'							
14	An Electric and Magnetic Field (EMF) Report will be produced, detailing the location, routing and voltage of relevant cables and assessing potential effects on receptors (any human and ecologically sensitive receptors within the Zone of Influence).	No	Operation and maintenance	Biodiversity and EMF	-	Applicant	Chapter 9: Biodiversity and Chapter 17: Technical Aspects to be 'Scoped Out'
15	A stand-alone Solar Photovoltaic Glint	No	Operation and maintenance	Glint and glare	-	Applicant / Project Glint	Chapter 17: Technical

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	and Glare Assessment will be prepared and appended to the ES. It will ensure that the residual impact risk on aviation and road receptors is acceptable and that there are no predicted effects on flight paths for RAF Marham.					and Glare Consultant	Aspects to be 'Scoped Out'
Specific commitments identified at scoping							
16	Restriction on times during which deliveries can take place (including start and end times of construction staff shifts and HGV delivery hours to avoid peak traffic, if necessary).	No	Construction / Decommissioning	Transport and access, noise and vibration, air quality, and human health	oCTMP / oDTMP	Applicant / Contractor	Chapter 6: Transport and Access, Chapter 7: Noise and Vibration, Chapter 8: Air Quality and Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Prescribed routes for vehicle movements to / from Site.	No	Construction / Decommissioning	Transport and access, noise and vibration and air quality	oCTMP / oDTMP	Applicant / Contractor	Chapter 6: Transport and Access, Chapter 7: Noise and Vibration and Chapter 8: Air Quality
17	All vehicles to be prohibited from waiting within or in the vicinity of the Site with their engines running.	No	Construction / Decommissioning	Transport and access, noise and vibration, air quality and greenhouse gases and climate change	oCTMP / oDTMP	Applicant / Contractor	Chapter 6: Transport and Access, Chapter 7: Noise and Vibration, Chapter 8: Air Quality and Chapter 15: Greenhouse Gases and Climate Change
18	Design measures comprising: Cycle access to the Data Centre Campus; cycle parking at the Data Centre Campus and	No	Operation and maintenance	Transport and access, noise and vibration, air quality and greenhouse gases and	Design principles	Applicant / Operator	Chapter 6: Transport and Access, Chapter 7: Noise and Vibration, Chapter 8: Air Quality and

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	adequate shower, changing facilities and storage lockers for staff commuting by active travel modes to the Data Centre Campus.			climate change			Chapter 15: Greenhouse Gases and Climate Change
19	Construction works will be carried out following Best Practicable Means (BPM) measures in line with the code of practice in British Standard (BS) 5228-1 and BS5228-2.	No	Construction / Decommissioning	Noise and vibration and human health	oCEMP / oDEMP	Applicant / Contractor	Chapter 7: Noise and Vibration and Technical Aspects to be 'Scoped Out'
20	Selection of quiet / low vibration equipment where activity is close to receptors and where reasonably practicable to do so.	No	Construction / Decommissioning	Noise and vibration	oCEMP / oDEMP	Applicant / Contractor	Chapter 7: Noise and Vibration
21	Location of noise generating plant and	No	Construction / Decommissioning	Noise and vibration	oCEMP / oDEMP	Applicant / Contractor	Chapter 7: Noise and Vibration

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	equipment as far as reasonably practicable from noise and vibration sensitive receptors.						
22	Use of noise reduction measures, such as attenuators / noise screening, if required.	No	Construction / Decommissioning	Noise and vibration	oCEMP / oDEMP	Applicant / Contractor	Chapter 7: Noise and Vibration
23	All plant items to be properly maintained and operated according to manufacturer's recommendations in such a manner as to avoid causing excessive noise.	No	Construction / Decommissioning	Noise and vibration	oCEMP / oDEMP	Applicant / Contractor	Chapter 7: Noise and Vibration
24	All pneumatic tools to be fitted with silencers or mufflers where activity is close to receptors and where	No	Construction / Decommissioning	Noise and vibration	oCEMP / oDEMP	Applicant / Contractor	Chapter 7: Noise and Vibration

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	reasonably practicable to do so.						
25	The 400kV overhead lines within the Western Cable Route are proposed to have a twin-bundle conductor configuration (for example “twin araucaria”) and will be installed in accordance with National Grid Technical Specifications.	No	Operation and maintenance	Noise and vibration	Design principles	Applicant / Designer	Chapter 7: Noise and Vibration
26	The 132kV overhead lines in the Eastern Cable Route are proposed to have a twin-bundle conductor configuration (for example, “twin zebra”) and will be	No	Operation and maintenance	Noise and vibration	Design principles	Applicant / Designer	Chapter 7: Noise and Vibration

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	installed in accordance with National Grid Technical Specifications.						
27	Any plant with moving parts, such as cooling equipment and transformers, would be expected to be mounted on suitable anti-vibration mounts to protect the plant from potential vibration effects and also to attenuate vibration generated by the plant.	No	Operation and maintenance	Noise and vibration	oOEMP	Applicant / Designer / Operator	Chapter 7: Noise and Vibration
28	Operational control measures for noise from operational plant, such as the backup generator testing regime.	No	Operation and maintenance	Noise and vibration	oOEMP	Applicant / Operator	Chapter 7: Noise and Vibration

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
29	Undertaking daily on-site and off-site inspections where receptors (including roads) are nearby to monitor dust.	Yes	Construction / Decommissioning	Air quality and human health	oCEMP / oDEMP	Applicant / Contractor	Chapter 8: Air Quality and Chapter 17: Technical Aspects 'to be' Scoped Out
30	Erecting solid screens or barriers around dusty activities or the boundaries of the working areas that are at least as high as any stockpiles on-site.	No	Construction / Decommissioning	Air quality and human health	oCEMP / oDEMP	Applicant / Contractor	Chapter 8: Air Quality and Chapter 17: Technical Aspects 'to be' Scoped Out
31	Using enclosed chutes, conveyors and covered skips.	No	Construction / Decommissioning	Air quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 8: Air Quality
32	Locating machinery with air emissions as far as practicable from sensitive receptors.	No	Construction / Decommissioning	Air quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 8: Air Quality

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
33	Ensuring high-efficiency plant and equipment are utilised on-site, including hybrid or electric plant where available and feasible.	No	Construction / Decommissioning	Air quality / greenhouse gases and climate change	oCEMP / oDEMP	Applicant / Contractor	Chapter 8: Air Quality and Chapter 15: Greenhouse Gases and Climate Change
34	Control of combustion emissions through adherence to the appropriate emission standards from EU Regulation 2016/1628.	No	Construction / Decommissioning	Air quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 8: Air Quality
35	Identification of 'biodiversity protection zones' and areas.	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity
36	Inclusion of details for the implementation of method statements to achieve ecological	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	and ornithological outcomes and mitigation measures.						
37	Identification of practical measures and sensitive working practices to avoid construction related effects.	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity
38	The location and timing of sensitive works to avoid harm to ecological features.	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity
39	The times during construction when particular specialists are required to be present to oversee works.	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity
40	Responsible persons and lines of communication.	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
41	Defining the role and responsibilities of an Ecological Clerk of Works (ECoW).	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity
42	Use of protective barriers and warning signs to avoid and prevent harm to ornithology and biodiversity.	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity
43	Minimise working areas to avoid unnecessary habitat removal / alteration and species disturbance.	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity
44	Avoidance of unnecessary light pollution on nocturnal species such as bats and otter through sensitively locating lighting installations	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	and using hoods or cowls.						
45	Precautionary Working Method Statement (PWMS) to include measures relating to protected species and habitats. This will be based upon standards set out within the Standards Publication on Biodiversity – code of practice for planning and development (BS 42020:2013).	No	Construction / Decommissioning	Biodiversity	oCEMP / oDEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity
46	Measures to ensure protection of habitats by routeing construction traffic away from sensitive habitats, where practicable.	No	Construction / Decommissioning	Biodiversity	oCTMP / oDTMP	Applicant / Contractor	Chapter 9: Biodiversity

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
47	Minimisation of risk associated with collisions for protected species through controlling vehicle speeds.	No	Construction / Decommissioning	Biodiversity	oCTMP / oDTMP	Applicant / Contractor	Chapter 9: Biodiversity
48	Where necessary, protected species licensing will be obtained (for example, for great crested newts or bats). Licensing requirements will be identified through baseline surveys and assessment work and confirmed as part of the DCO Application.	No	Construction / Decommissioning	Biodiversity	oCEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity
49	Appropriate pre-construction surveys.	No	Construction / Decommissioning	Biodiversity	oCEMP	Applicant / Contractor / Project Ecologist	Chapter 9: Biodiversity

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
50	Maintenance of permanent protective fencing around sensitive ecological areas to prevent vehicle or human encroachment.	No	Operation and maintenance	Biodiversity	oOEMP / oLEMP	Applicant / Operator	Chapter 4: Initial Description of the Proposed Development and Chapter 9: Biodiversity
51	Controlled vegetation maintenance, to avoid nesting / breeding seasons.	No	Operation and maintenance	Biodiversity	oOEMP / oLEMP	Applicant / Operator	Chapter 4: Initial Description of the Proposed Development and Chapter 9: Biodiversity
52	Fencing will contain clearances above ground or use of mammal gates included to permit the passage of wildlife.	No	Operation and maintenance	Biodiversity	oLEMP	Applicant / Operator	Chapter 4: Initial Description of the Proposed Development and Chapter 9: Biodiversity
53	Habitat design will include measures designed to enhance retained habitats for	No	Operation and maintenance	Biodiversity	oLEMP	Applicant / Operator	Chapter 9: Biodiversity

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	notable and protected species such that the operation of the Proposed Development delivers an overall benefit for biodiversity.						
54	A draft Habitat Management and Monitoring Plan (HMMP) will be submitted as part of the BNG Plan and will require ongoing monitoring for 30 years.	Yes	Operation and maintenance	Biodiversity	BNG Plan	Applicant / Operator	Chapter 9: Biodiversity
55	All cabling will be installed in line with relevant design standards, including the International Commission on Non-Ionizing	No	Operation and maintenance	Biodiversity and Electric and Magnetic Fields (EMF)	Design principles	Applicant / Designer	Chapter 4: Initial Description of the Proposed Development, Chapter 9: Biodiversity and Chapter 17:

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Radiation Protection (ICNIRP) Guidelines for Limiting Exposures to Time-Varying Electric, Magnetic and Electromagnetic Fields (up to 300 GHz).						Technical Aspects to be 'Scoped Out'.
56	Using existing access routes, where practicable, to avoid unnecessary removal of vegetation.	No	Construction / Decommissioning	Landscape and visual	oCEMP / oDEMP	Applicant / Contractor	Chapter 10: Landscape and Visual
57	Protective measures such as retaining existing vegetation, including Root Protection Areas (RPAs). Appropriate buffers will also be incorporated in relation to watercourses,	No	Construction / Decommissioning	Landscape and visual	oCEMP / oDEMP	Applicant / Contractor	Chapter 10: Landscape and Visual

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	drainage ditches and ancient woodland.						
58	Restrict compounds and material storage to designated working areas, positioned with consideration for visual prominence and existing landscape features.	No	Construction / Decommissioning	Landscape and visual	oCEMP / oDEMP	Applicant / Contractor	Chapter 10: Landscape and Visual
59	Temporary screening or hoarding around compounds and storage areas.	No	Construction / Decommissioning	Landscape and visual	oCEMP / oDEMP	Applicant / Contractor	Chapter 10: Landscape and Visual
60	Measures to maintain access to the Public Rights of Way (PRoW) network within the Site, including protection and provision of any	No	Construction / Decommissioning	Landscape and visual, socio-economics and population and human health	oCEMP / oDEMP	Applicant / Designer / Operator / Contractor	Chapter 10: Landscape and Visual and Chapter 16: Socio-economics and Population and Chapter 17: Technical

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	necessary diversions.						Aspects to be 'Scoped Out'
61	Design of the layout and siting of the Solar PV Panels, Substations, Data Centre Campus, BESS Units and overhead lines to avoid key sensitive landscape and visual receptors and / or reduce visual prominence, where possible.	No	Operation and maintenance	Landscape and visual	Design principles	Applicant / Designer / Operator	Chapter 10: Landscape and Visual
62	Undergrounding of connection infrastructure in strategic locations to avoid key sensitive landscape, visual and heritage receptors and / or reduce visual prominence, in	No	Operation and maintenance	Landscape and visual and built heritage	Design principles	Applicant / Operator / Designer	Chapter 10: Landscape and Visual and Chapter 11: Built Heritage

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	particular in locations where there is limited existing overhead infrastructure.						
63	Retention of existing hedgerows, trees and field boundaries, including appropriate buffers where practicable. If removal of hedgerows is required for the Cable Routes, these will be translocated or replanted post-construction where possible.	No	Operation and maintenance	Landscape and visual	oLEMP / oOEMP	Applicant / Operator	Chapter 10: Landscape and Visual
64	Provision of new planting and grassland seeding, strengthening of existing vegetation through	No	Operation and maintenance	Landscape and visual	oLEMP / oOEMP	Applicant / Operator	Chapter 10: Landscape and Visual

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	supplementary planting and / or management of existing retained vegetation to contribute to visual screening and / or landscape structure and enhancement.						
65	Temporary compounds and storage areas will be sited, designed and managed to avoid or minimise, to the fullest practicable extent, any visual, auditory, olfactory, dust-related, or other impacts on the setting of heritage assets and any associated key views.	No	Construction / Decommissioning	Built Heritage	oCEMP / oDEMP	Applicant / Contractor	Chapter 11: Built Heritage

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
66	Lighting levels will be minimised, where practicable, informed by any relevant health, safety and security concerns, both in terms of duration and luminosity.	No	Construction / Decommissioning	Built Heritage	oCEMP / oDEMP	Applicant / Contractor	Chapter 11: Built Heritage
67	Construction will be managed, wherever practicable, to avoid or minimise loss of any landscape features such as might contribute to any positive screening effects or the optimal integration of the Proposed Development into the setting of heritage assets.	No	Construction / Decommissioning	Built Heritage	oCEMP / oDEMP	Applicant / Contractor	Chapter 11: Built Heritage

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
68	Access routes will avoid historic settlement cores, wherever possible.	No	Construction / Operation and maintenance / Decommissioning	Built Heritage	oCTMP / oOEMP / oDTMP	Applicant / Contractor / Operator	Chapter 11: Built Heritage
69	Above-ground infrastructure will be sited, designed and managed to avoid or minimise, to the fullest practicable extent, any foreseeable impacts on the setting of heritage assets, including any associated key views.	No	Operation and maintenance	Built heritage	Design principles	Applicant / Operator	Chapter 11: Built Heritage
70	Where practicable, biodiversity areas, green space and new and existing planting will be used to provide screening and / or to better integrate the	No	Operation and maintenance	Built heritage	Design principles	Applicant / Operator	Chapter 11: Built Heritage

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Proposed Development into the setting of relevant heritage assets.						
71	The operational Proposed Development will be monitored, to the fullest extent practicable, to identify any potential degradation or loss of screening, such as hedgerow loss, in order to address any such occurrences, and avoid or minimise any potential resulting impact on the setting of heritage assets.	Yes	Operation and maintenance	Built heritage	oOEMP / oLEMP	Applicant / Operator	Chapter 11: Built Heritage
72	The Moated site and formal garden remains at Alymer	No	Construction	Built heritage and buried heritage	Design principles	Applicant / Designer	Chapter 4: Initial Description of the Proposed

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Hall Scheduled Monument are not within the Site boundary to avoid direct (physical) effects on this designated asset. The undesignated earthworks associated with the Moated site and formal garden remains at Alymer Hall Scheduled Monument that lie within the Site will be left in-situ.						Development, Chapter 11: Built Heritage and Chapter 12: Buried Heritage
73	Non-intrusive geophysical surveys for the underground cabling within the Eastern Cable Route are proposed. Pre-submission geophysical surveys are not proposed for	No	Pre-submission	Buried heritage	- (already being undertaken)	Applicant / Project Archaeologist	Chapter 12: Buried Heritage

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	the overhead line section of the Eastern Cable Route. A programme of pre-submission archaeological evaluation trenches is being undertaken for the Data Centre Campus area within the Western Site to confirm there is no buried heritage restriction on locating this high-impact infrastructure in this location. These trenches will target potential archaeological and geoarchaeological features identified via the geophysical survey and will						

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	include geoarchaeological investigations. The results of these evaluation trenches will help to inform the Archaeological DBA and ES and begin to inform any requirements for further mitigation work in this area. It will potentially enable the avoidance of significant adverse effects upon archaeological assets of high importance where practicable at the design stage. An Archaeological Written Scheme of Investigation (WSI)						

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	for these pre-submission archaeological evaluation trenching was agreed with the Historic Environment Officer at NCC prior to the commencement of the evaluation. They are being kept informed of the progress of works so as to enable appropriate monitoring to be undertaken. With regard to the Archaeology and Solar Farms – Good Practice Guide, additional further pre-commencement trenching is not proposed at any						

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	further location within the Site, though agreement will be sought with NCC to identify any areas of interest from the geophysical survey and an Archaeological WSI will be secured through a DCO Requirement for pre-construction works. The intention of the geophysical surveys across the Main Site is to identify any areas for targeted investigation post-consent (pre-construction).						
74	The removal of existing structures or landscape features will be undertaken	No	Construction	Buried heritage	oCEMP	Applicant / Contractor	Chapter 12: Buried Heritage

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	with due care to minimise unnecessary adverse impacts to potential archaeological horizons outside of or below their footprints.						
75	Worksites, compounds and storage areas will be sited to avoid or reduce as far as possible any impacts on identified archaeological features.	No	Construction	Buried heritage	oCEMP	Applicant / Contractor	Chapter 12: Buried Heritage
76	Where possible, access routes will avoid identified archaeological features.	No	Construction / Decommissioning	Buried heritage	oCTMP / oDTMP	Applicant / Contractor	Chapter 12: Buried Heritage
77	Archaeological evaluation trenching	No	Construction	Buried heritage	Archaeological Mitigation	Applicant / Contractor /	Chapter 12: Buried Heritage

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	will be undertaken post-consent, where appropriate, to assess the archaeological potential of the Site. Where archaeological remains are identified and significant adverse effects are unavoidable, further archaeological mitigation works, such as excavation and preservation by record, will be undertaken. The requirements and scope for any further archaeological mitigation works will be discussed in advance with NCC.				Strategy (via specific work package Written Schemes of Investigation (WSI))	Project Archaeologist	

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	The results of the archaeological investigations will also help to inform potential micrositing changes to the layout of the Proposed Development to enable preservation in-situ should it be deemed appropriate. Specific packages of works will be in accordance with a WSI, which will be in line with the overarching AMS, approved by the Historic Environment Officer at NCC.						
78	Decommissioning works will be carried out with consideration of	No	Decommissioning	Buried heritage	oDEMP	Applicant / Contractor	Chapter 12: Buried Heritage

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	archaeological remains to avoid disturbance of any remains that may still be present and have not been subject to previous archaeological mitigation.						
79	Infrastructure will be designed to minimise the number of watercourse crossings and encroachments. Where feasible, existing crossings will be used and, if necessary, improved.	No	Construction	Water environment	Design principles / oCEMP	Applicant / Designer / Contractor	Chapter 13: Water Environment
80	Suitable offsets will be provided from the top of the bank of all watercourses to all construction /	No	Construction / Decommissioning	Water environment	Design principles / oCEMP / oDEMP	Applicant / Designer / Contractor	Chapter 13: Water Environment

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	decommissioning activities to ensure that access for maintenance is provided.						
81	Wherever practicable, material stockpiles and storage will be located outside of the appropriate flood risk extents.	No	Construction / Decommissioning	Water environment	oCEMP / oDEMP / oSMP	Applicant / Contractor	Chapter 13: Water Environment
82	Temporary drainage measures will be employed if required to ensure the rate and quality of surface water runoff are managed. This will include the management of existing flood flow paths, ensuring that these are maintained or	No	Construction / Decommissioning	Water environment and land quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 13: Water Environment and Chapter 17: Technical Aspects to be 'Scoped Out'.

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	diverted as required, to ensure no increased flood risk to users of the Site or areas off-site.						
83	Water quality monitoring will be undertaken in appropriate locations to ensure polluted discharges are prevented to surrounding waterbodies.	Yes	Construction / Decommissioning	Water environment	oCEMP / oDEMP	Applicant / Contractor	Chapter 13: Water Environment
84	Temporary foul drainage measures will be employed, if required, to ensure foul drainage is contained and managed during construction.	No	Construction / Decommissioning	Water environment	oCEMP / oDEMP	Applicant / Contractor	Chapter 13: Water Environment
85	The construction works will be designed to reduce	No	Construction	Water environment	oCEMP	Applicant / Contractor	Chapter 13: Water Environment

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	on-site water demand as far as possible through the inclusion of prefabricated elements that are constructed off-site (such as the panels and Mounting Structures for the Solar PV Panel Component) and require limited construction activity during installation.						
86	Rainwater harvesting will be utilised, where practicable, and water efficiency measures will be implemented to limit the use of water where required.	No	Construction / Operation and maintenance / Decommissioning	Water environment	oCEMP / oOEMP / oDEMP	Applicant / Contractor / Operator	Chapter 13: Water Environment

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
87	Water is to be sourced from non-potable sources or private supplies wherever possible, to reduce the pressure on demand from the water company. However, the feasibility of this is to be confirmed at the detailed design stage. Discussions will be held with Anglian Water to determine capacity.	No	Construction / Decommissioning	Water environment	oCEMP / oDEMP	Applicant / Contractor / Project Water Consultant	Chapter 13: Water Environment
88	Pollution prevention measures will be employed in accordance with good practice guidelines and included when storing, handling and mixing of polluting substances (such as	No	Construction / Decommissioning	Water environment	oCEMP / oDEMP	Applicant / Contractor	Chapter 13: Water Environment

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	concrete production), to minimise the potential for spills and impact to the environment. Pollution prevention measures will also be employed to ensure water quality of any discharged surface water is maintained for the duration of the construction / decommissioning period. This will include an emergency spill response procedure.						
89	Flood risk to users of the construction and decommissioning site and off-site areas will be managed through	No	Construction / Decommissioning	Water environment	oCEMP / oDEMP	Applicant / Contractor	Chapter 13: Water Environment

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	the following good practice procedures as well as flood evacuation measures. This will include a consideration of off-site flood risk (for fluvial and pluvial flooding), setting out how risk is managed accordingly.						
90	Provision of a drilling fluid breakout plan for where HDD is proposed.	No	Construction	Water environment	oCEMP	Applicant / Contractor	Chapter 13: Water Environment
91	A sequential approach will be taken to siting infrastructure within the Site, with the flood risk vulnerability classification considered in the	No	Operation and maintenance	Water environment	Design principles	Applicant / Designer / Project Flood Risk Consultant	Chapter 13: Water Environment

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	context of the risk of flooding from relevant sources within the Site.						
92	The Surface Water Drainage Strategy will include Sustainable Drainage Systems (SuDS) that are commensurate with the scale and nature of the Proposed Development and designed with regard to national and local planning policy and guidance. Surface water runoff from new impermeable surfaced areas (such as the Data Centre Campus, BESS Units and Substations) will be managed through	No	Operation and maintenance	Water environment, greenhouse gases and climate change and land quality	Design principles / oDS	Applicant / Designer / Project Drainage Consultant	Chapter 13: Water Environment, Chapter 15: Greenhouse Gases and Climate Change and Chapter 17: Technical Aspects to be 'Scoped Out'.

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	the use of SuDS to ensure that there is no increase in flood risk elsewhere, and to ensure that the potential for pollutants is appropriately controlled prior to discharge. For the Solar PV Panels within the Main Site, a quantified surface water runoff strategy will not be provided. This is on the basis that when vegetated cover is provided beneath the panels and within spaces between panel rows (which will be the case for the Proposed Development), runoff from panels is						

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	considered to have a negligible effect when compared to the baseline scenario. However, strategic SuDS such as cut-off drains, swales, filter drains and scrapes / shallow basins will be implemented where appropriate and feasible within the Solar PV Panels.						
93	The Surface Water Drainage Strategy will include measures to ensure sufficient fire water and containment procedures are provided for emergency purposes should a fire occur within the Data Centre	No	Operation and maintenance	Water environment	Design principles / oDS / oBSMP	Applicant / Designer / Operator	Chapter 13: Water Environment

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Campus or BESS Units. This will include pollution control features such as drain closure valves and fire water containment systems such as bunded or kerbed areas.						
94	Development will be suitably offset from watercourses to allow sufficient access for maintenance corridors. The watercourse offsets will be discussed and agreed with the Environment Agency, Lead Local Flood Authority (LLFA), and Internal Drainage Boards (IDBs) as relevant.	No	Operation and maintenance	Water environment	Design principles	Applicant / Designer / Operator	Chapter 13: Water Environment

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Where necessary to cross watercourses for access or cable crossings, the method / form of crossing and associated details will be discussed and agreement will be sought with the relevant stakeholders.						
95	Flood risk will be managed through the following flood evacuation and management plans.	No	Operation and maintenance	Water environment	oOEMP	Applicant / Operator	Chapter 13: Water Environment
96	The raising of infrastructure above flood levels, where required and practicable, will be undertaken to ensure there is no increase in flood risk	No	Operation and maintenance	Water environment	Design principles / oDS	Applicant / Designer	Chapter 13: Water Environment

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	as a result of the Proposed Development and that the Site will remain safe and operational for its lifetime.						
97	Detailed ALC survey information from the site-specific ALC surveys will be used to seek to design the layout and siting of fixed infrastructure to reduce the use of higher quality land, where possible, for works that will disturb the soils and might affect land quality.	No	Construction	Agricultural land and soils	Design principles	Applicant / Designer	Chapter 14: Agricultural Land and Soils
98	All works to be undertaken in general accordance with the	No	Construction	Agricultural land and soils	oCEMP / oSMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.						
99	Soil handling guidelines, including the stripping, segregated storage, and replacement / reinstatement of topsoil and subsoil, with stockpiles managed to prevent erosion and anaerobic conditions.	No	Construction	Agricultural land and soils	oSMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils
100	A traffic management plan establishing dedicated construction routes to minimise soil compaction and sealing, with track	No	Construction	Agricultural land and soils	oCTMP / oSMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	matting where access is required over unstripped soils.						
101	Control of the timing of works to avoid periods when soils are most susceptible to structural damage (e.g. when waterlogged).	No	Construction	Agricultural land and soils	oCEMP / oSMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils
102	Works undertaken and overseen by suitably qualified individuals to minimise impacts on the soil.	No	Construction	Agricultural land and soils	oCEMP / oSMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils
103	Liaison with surrounding landowners / farmers to reduce disruption to access.	No	Construction	Agricultural land and soils	oCEMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
104	A permanent grass sward maintained beneath and between the panel rows to protect soil structure, limit erosion and surface runoff, and maintain soil organic matter.	No	Operation and maintenance	Agricultural land and soils	oLEMP	Applicant / Operator	Chapter 14: Agricultural Land and Soils
105	Use of low-ground-pressure vehicles and designated access tracks for routine maintenance of the Solar PV Panels, with vehicle movements confined to established routes to avoid widespread soil compaction.	No	Operation and maintenance	Agricultural land and soils	oOEMP	Applicant / Operator	Chapter 14: Agricultural Land and Soils
106	Scheduling of maintenance activities and vehicular access for the Solar PV Panels	No	Operation and maintenance	Agricultural land and soils	oOEMP	Applicant / Operator	Chapter 14: Agricultural Land and Soils

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	to avoid periods when soils are wet and most susceptible to compaction and rutting if possible.						
107	Retention of soils in situ beneath the Solar PV Panels, with minimal disturbance during operation and no routine cultivation or soil stripping.	No	Operation and maintenance	Agricultural land and soils	oOEMP / oSMP	Applicant / Operator	Chapter 14: Agricultural Land and Soils
108	Management of the sward by low-intensity grazing or cutting, avoiding overstocking that could cause poaching and localised compaction.	No	Operation and maintenance	Agricultural land and soils	oOEMP / oLEMP / oSMP	Applicant / Operator	Chapter 14: Agricultural Land and Soils

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
109	Removal of above-ground infrastructure associated with the Solar PV Panels across the Main Site, Eastern Site BESS Units and Substations and Eastern Cable Route, using low-ground-pressure plant and designated access routes to limit soil compaction.	No	Decommissioning	Agricultural land and soils	oDEMP / oSMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils
110	Decompaction and loosening of soils affected during decommissioning to restore soil structure and rooting depth.	No	Decommissioning	Agricultural land and soils	oDEMP / oSMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils
111	Reinstatement of soil profiles to pre-development levels, with topsoil and subsoil handled	No	Decommissioning	Agricultural land and soils	oDEMP / oSMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	separately and replaced in the correct sequence in accordance with best-practice soil handling.						
112	Scheduling of decommissioning works to avoid periods when soils are wet and most susceptible to structural damage.	No	Decommissioning	Agricultural land and soils	oDEMP / oSMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils
113	Removal of the operational sward and reinstatement of the land to agricultural use, retaining where practicable the soil-health benefits accrued during the operational and maintenance period.	No	Decommissioning	Agricultural land and soils	oDEMP	Applicant / Contractor	Chapter 14: Agricultural Land and Soils

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
114	Promoting the procurement of low-carbon, responsibly sourced, and recycled construction materials (e.g. low-carbon concrete and recycled steelwork), where feasible. Implementing waste minimisation hierarchies to prioritise reuse and recycling on-site, diverting construction waste from landfill.	No	Construction / Decommissioning	Greenhouse gases and climate change	oCEMP / oDEMP	Applicant / Contractor	Chapter 15: Greenhouse Gases and Climate Change
115	A 'fabric first' approach to building design.	No	Operation and maintenance	Greenhouse gases and climate change	Design principles	Applicant / Designer	Chapter 15: Greenhouse Gases and Climate Change
116	Targeted low fabric air permeability and improvement on	No	Operation and maintenance	Greenhouse gases and	Design principles	Applicant / Designer	Chapter 15: Greenhouse

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	fabric U-values beyond notional building and minimum standards.			climate change			Gases and Climate Change
117	Use of low-energy, efficient light fittings.	No	Operation and maintenance	Greenhouse gases and climate change	Design principles / oOLS	Applicant / Designer	Chapter 15: Greenhouse Gases and Climate Change
118	External lighting will feature daylight sensors and / or presence detectors.	No	Operation and maintenance	Greenhouse gases and climate change	oOEMP / oOLS	Applicant / Designer	Chapter 15: Greenhouse Gases and Climate Change
119	Waste heat recovery apparatus will also be included.	No	Operation and maintenance	Greenhouse gases and climate change	Design principles	Applicant / Designer	Chapter 15: Greenhouse Gases and Climate Change
120	Backup generators to be fully Hydrotreated Vegetable Oil (HVO) compatible.	No	Operation and maintenance	Greenhouse gases and climate change	oOEMP	Applicant / Designer / Operator	Chapter 15: Greenhouse Gases and Climate Change

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
121	Use of a closed-loop cooling system for the Data Centre Campus to reduce water consumption.	No	Operation and maintenance	Greenhouse gases and climate change	Design principles	Applicant / Designer / Operator	Chapter 15: Greenhouse Gases and Climate Change
122	Water systems designed in accordance with applicable standards, with water-efficient fittings and controls specified to minimise potable water consumption.	No	Operation and maintenance	Greenhouse gases and climate change	Design principles	Applicant / Designer / Operator	Chapter 15: Greenhouse Gases and Climate Change
123	Specification of low consumption sanitary fixtures.	No	Operation and maintenance	Greenhouse gases and climate change	Design principles	Applicant / Designer / Operator	Chapter 15: Greenhouse Gases and Climate Change
124	Water meter connected to building management systems to allow	No	Operation and maintenance	Greenhouse gases and climate change	oOEMP	Applicant / Operator	Chapter 15: Greenhouse Gases and Climate Change

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	active consumption monitoring.						
125	Monitoring weather forecasts and relevant weather warnings, with a designated member of the site management team appointed for this purpose.	No	Construction / Decommissioning	Greenhouse gases and climate change	oCEMP / oDEMP	Applicant / Contractor	Chapter 15: Greenhouse Gases and Climate Change
126	Where adverse or extreme weather events are forecast, construction / decommissioning activities will be reviewed and appropriate risk management measures implemented as necessary to reduce potential effects on the workforce,	No	Construction / Decommissioning	Greenhouse gases and climate change	oCEMP / oDEMP	Applicant / Contractor	Chapter 15: Greenhouse Gases and Climate Change

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	construction / decommissioning programme and site infrastructure. For example, during heatwaves adequate potable water supplies for workers will be provided.						
127	The design will include consideration of: • The selection of materials and cooling systems, to be designed to a high tolerance to expected extremes of temperature. • Heights of proposed infrastructure of all Components across the Proposed	No	Operation and maintenance	Greenhouse gases and climate change	Design principles	Applicant / Designer	Chapter 15: Greenhouse Gases and Climate Change

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Development, design of roofs and façades and selection of robust materials, to reduce potential damage from extreme rainfall. • Promotion of thermal comfort and reduce the risk of overheating building users. • Use of water cooling systems, as well as water efficient fixtures and fittings to manage water consumption.						
128	All buildings and structures within the Proposed Development will be	No	Operation and maintenance	Greenhouse gases and climate change	Design principles	Applicant / Designer	Chapter 15: Greenhouse Gases and Climate Change

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	constructed to comply with the latest Building Regulations and Fire Regulations, which will include well sign-posted and clear fire escape and automatic fire detection, alarm and suppression systems.						
129	Backup power supply will be provided to essential systems within the Data Centre Campus, in accordance with Building Regulations, to mitigate against loss of power supply to the buildings during times of high winds and storms.	No	Operation and maintenance	Greenhouse gases and climate change	Design principles	Applicant / Designer	Chapter 15: Greenhouse Gases and Climate Change

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
130	Consideration of alternative sustainable modes of transport to mitigate disruption to travel due to weather events.	No	Operation and maintenance	Greenhouse gases and climate change	oTP	Applicant / Operator	Chapter 15: Greenhouse Gases and Climate Change
131	Mitigation of effects on biodiversity and landscaping from climate change.	No	Operation and maintenance	Greenhouse gases and climate change	oOEMP / oLEMP	Applicant / Operator	Chapter 15: Greenhouse Gases and Climate Change
132	Maintain access to residential dwellings, commercial properties and community facilities.	No	Construction / Operation and maintenance / Decommissioning	Socio-economics and population	oCEMP / oCTMP / oOEMP / oDEMP / oDTMP	Applicant / Contractor	Chapter 16: Socio-economics and population
133	Minimise temporary land take.	No	Construction	Socio-economics and population	oCEMP / oDEMP	Applicant / Contractor	Chapter 16: Socio-economics and population
134	Compliance with required regulations, including The Control of Electromagnetic	No	Operation and maintenance	EMF	oOEMP	Applicant / Designer	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Fields at Work Regulations 2016 and The Electricity Safety, Quality and Continuity Regulations 2002.						
135	For the overhead lines, pylon towers will not be located within 100m of a residential receptor.	No	Operation and maintenance	EMF and microclimate	Design principles	Applicant / Designer / Contractor	Chapter 4: Initial Description of the Proposed Development and Chapter 17: Technical Aspects to be 'Scoped Out'
136	Use of tracker panels in the central fields of the Eastern Site.	No	Operation and maintenance	Glint and glare	Design principles	Applicant / Designer	Chapter 17: Technical Aspects to be 'Scoped Out'
137	Changes to the site configuration. This may involve: • Changes to the orientation angle of the solar panels.	No	Operation and maintenance	Glint and glare	Design principles	Applicant / Designer	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	• Changes to the tilt angle of the solar panels.						
138	Provision of screening (planting or opaque fence) at the Site boundary or elsewhere between the observer and the reflecting panel areas. Site surveys to inform visibility (and landscaping plans) more accurately will be undertaken.	No	Operation and maintenance	Glint and glare	oLEMP	Applicant / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'
139	Clear and transparent mechanisms for communication with the community, including a formal complaints and enquiries procedure.	No	Construction / Operation and maintenance / Decommissioning	Human health	oCEMP / oOEMP / oDEMP	Applicant / Contractor / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
140	Ground investigation works will be undertaken on-site in accordance with relevant guidance and standards to confirm the existing ground conditions, contamination and geotechnical properties, where required and would be targeted on specific parts of the Site.	No	Construction	Land quality	DCO Requirement	Applicant / Contractor	Chapter 4: Initial Description of the Proposed Development and Chapter 17: Technical Aspects to be 'Scoped Out'
141	Where ground investigations identify contamination or unsuitable materials, appropriate measures for their management, treatment, removal or reuse will be implemented. This	No	Construction	Land quality and major accidents and disasters	DCO Requirement	Applicant / Contractor	Chapter 4: Initial Description of the Proposed Development and Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	may include targeted remediation, soil management, segregation and / or testing of excavated materials, and measures to facilitate the appropriate re-use or disposal of site-won soils. These measures would be resolved ahead of the main construction works and the completion and operation of the Proposed Development.						
142	Where the former base RAF Barton Bendish is located, there is the potential for UXO associated with historical military use. Where	No	Construction	Land quality	oCEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	significant excavation or other intrusive works are proposed in this area, an appropriate level of UXO assessment and, where necessary, specialist UXO oversight will be undertaken. The findings will inform the requirements for safe intrusive works and any associated mitigation measures.						
143	Environmental management, emergency response and incident procedures, in line with the Guidance for Pollution Prevention (GPP) 21 Pollution incident response	No	Construction / Decommissioning	Land quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	planning (albeit this has been withdrawn in England but remains industry standard).						
144	Adherence to the CDM Regulations 2015 and other relevant health and safety legislation.	No	Construction / Decommissioning	Land quality and major accidents and disasters	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
145	Use of Personal Protective Equipment (PPE), Respiratory Protective Equipment (RPE), where required.	No	Construction / Decommissioning	Land quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
146	Pollution prevention measures in accordance with relevant guidance and industry good practice, including CIRIA's Control of Water Pollution from	No	Construction / Decommissioning	Land quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Construction Sites and GPP 5: Works and maintenance in or near water (albeit these have been withdrawn in England but remain industry standard).						
147	Piling and Earthworks Risk Assessments, as appropriate, to assess and manage potential risks to controlled waters on-site during construction in accordance with Environment Agency Guidance (CL:AIRE 2025).	No	Construction	Land quality	oCEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'.
148	Waste management and materials handling procedures,	No	Construction / Decommissioning	Land quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Discovery strategy, watching brief and unexpected contamination protocol.						
149	Site inspection, monitoring, auditing and corrective action procedures.	No	Construction / Decommissioning	Land quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
150	Testing of re-used and imported soils in line with Waste Classification technical guidance.	No	Construction / Decommissioning	Land quality	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
151	The design process will principally focus on the protection of the underlying aquifers and will involve the siting of infrastructure, including the BESS Units and Substations within the Main Site,	No	Operation and maintenance	Land quality	Design principles	Applicant / Designer	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	together with the design of piles and foundations, where required for buried and overhead line cables within the Cable Routes. The siting and design of the Data Centre Campus, BESS Units and Substations will, where practicable, seek to minimise ground disturbance and penetration into underlying permeable strata and aquifers						
152	Sealed drainage systems, impermeable surfacing and secondary containment for any transformers,	No	Operation and maintenance	Land quality	oOEMP	Applicant / Designer	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	storage tanks and associated infrastructure, and procedures for the safe storage, handling and disposal of fuels, oils, chemicals and wastes as appropriate.						
153	Spill response procedures, emergency incident management measures and inspection and maintenance requirements.	No	Operation and maintenance	Land quality	oOEMP	Applicant / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'
154	Operational controls for the BESS Units, including leak detection, fire water management and routine inspection and maintenance	Yes	Operation and maintenance	Land quality	oBSMP	Applicant / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	procedures, will also be included where relevant and will comply with the National Fire Chiefs Council guidance for this infrastructure.						
155	Monitoring, reporting and auditing procedures are to be undertaken throughout the lifetime of the Proposed Development to ensure that operational activities do not result in unacceptable risks to human health, controlled waters, the built environment or ecological receptors, and that the Proposed Development is	Yes	Operation and maintenance	Land quality	oOEMP	Applicant / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	operated in accordance with relevant legislation and industry good practice guidance.						
156	Surface water drainage will be appropriately designed and, where practicable, restricted to maintain appropriate discharge rates and minimise the potential for uncontrolled run-off. The design will locate potentially contaminative infrastructure away from sensitive environmental receptors, including groundwater SPZs. Appropriate drainage features,	No	Operation and maintenance	Land quality	Design principles / oDS	Applicant / Designer / Contractor / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	designated drainage areas and containment measures, including bunding, where required, will be incorporated into the design to manage, attenuate and, where appropriate, treat surface water run-off and reduce the potential for impacts to underlying soils and groundwater						
157	The construction / decommissioning works will be carried out following relevant guidance in the Institution for Lighting Professionals GN01: Guidance Notes for	No	Construction / Decommissioning	Lighting	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	the Reduction of Obtrusive Light.						
158	The development of a construction / decommissioning phase lighting strategy, which will set out the details of the proposed temporary lighting installations (including directionality, locations, type and heights), duration and timing and sensitive receptors identified.	No	Construction / Decommissioning	Lighting	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
159	Limiting lighting / perimeter security lighting close to nearby properties, as far as practicable.	No	Construction / Decommissioning	Lighting	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
160	Use of directional lighting and hoods / cowls, where appropriate, to reduce light spill and glare to off-site areas, in particular with regard to light spill into residential properties.	No	Construction / Decommissioning	Lighting	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
161	The reduction of fixed lighting outside working hours.	No	Construction / Decommissioning	Lighting	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
162	Details of the proposed permanent lighting installations (including location, directionality, type and heights), duration and timing and sensitive receptors identified. Operational lighting will be designed and	No	Operation and maintenance	Lighting	oOLS	Applicant / Designer / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	installed with regard to relevant standards and guidance, including BS 5489-1:2020 'Design of road lighting – Part 1: Lighting of roads and public amenity areas – Code of practice', BS 12464-2: 2014 'Light and lighting – Light of workplaces Part 2: Outdoor workplaces' and the Chartered Institute of Building Services Engineers (CIBSE) LG01: The industrial environment, LG06: The exterior environment and LG21: Protecting the night-time environment.						

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
163	Restriction of construction site access to suitably qualified workers only.	No	Construction / Decommissioning	Major accidents and disasters	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
164	Adherence to relevant guidance, including the Health and Safety Executive's (HSE) Avoiding danger from overhead and underground services, Fire Prevention on Construction Sites: Joint Code of Practice and the HSE's Fire Safety in Construction.	No	Construction / Decommissioning	Major accidents and disasters	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
165	Earthworks and foundation design in accordance with national standards and guidance,	No	Construction	Major accidents and disasters	oCEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	including BS 6031:2009: Code of Practice for Earthworks and Building Regulations Approved Document A – Structure.						
166	Appropriate storage, handling and disposal of chemicals following the COSHH Regulations 2002.	No	Construction / Operation and maintenance / Decommissioning	Major accidents and disasters	oCEMP / oOEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
167	Use of appropriate working standoff distances from utilities and adherence to relevant legislation (CDM Regulations 2015) and good practice guidance.	No	Construction / Decommissioning	Major accidents and disasters	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
168	All chemical and fuel stores / tanks will be designed, installed	Yes	Operation and maintenance	Major accidents and disasters	Design principles / oOEMP	Applicant / Designer / Operator	Chapter 17: Technical

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	and maintained in accordance with relevant guidance, including L5 Control of substances hazardous to health ACOP and guidance. Pollution prevention features will be included, such as the use of impermeable surfacing, bunding for tanks, with the bund sized at least 110% of the volume of the tank, and isolation from the surface water drainage network. All fuel stores will be designed, installed and maintained with regard to The Dangerous Substances and						Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	Explosive Atmospheres Regulations 2002 and The Control of Pollution (Oil Storage) (England) Regulations 2001. No bulk fuel storage will be located in sensitive locations (e.g. source protection zones) and not adjacent to watercourses.						
169	The buildings will be fitted with an active fire protection system that will detect flames, heat, gas, and smoke, alert personnel and rescue services and activate fire suppression or extinguishing systems.	No	Operation and maintenance	Major accidents and disasters	Design principles	Applicant / Designer / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
170	All chemical and fuel stores / tanks will be designed, installed and maintained with regard to The Dangerous Substances and Explosive Atmospheres Regulations 2002 and The Control of Pollution (Oil Storage) (England) Regulations 2001. Operational protocols may include fuel transfer systems that feature fire-safe remotely operated shut-off valves. Bulk storage would be within locked, fenced compounds to deter accidental impacts.	No	Operation and maintenance	Major accidents and disasters	Design principles / oOEMP	Applicant / Designer / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
171	All operational plant / infrastructure will be designed, installed and maintained with regard to relevant legislation, standards and guidance, including Electrical Equipment (Safety) Regulations 2016 and Electricity Safety, Quality and Continuity (Amendment) Regulations 2006.	No	Operation and maintenance	Major accidents and disasters	Design principles	Applicant / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'
172	The buildings will have a lightning protection system, with appropriate grounding.	No	Operation and maintenance	Major accidents and disasters	Design principles	Applicant / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'
173	The installation of appropriate fire safety design measures, including	No	Operation and maintenance	Major accidents and disasters	Design principles / oOEMP / oBSMP	Applicant / Designer / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	the provision of firewater tanks.						
174	No structure above 4.5m in height within 4km or any structure above 8m within 9km will be introduced from the runways at RAF Marham.	No	Operation and maintenance	Major accidents and disasters	Design principles	Applicant / Designer / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'
175	The design of any drainage or ecological features will be such as to prevent increases in flocks of birds, thereby increasing the risk of birdstrike.	No	Operation and maintenance	Major accidents and disasters	Design principles	Applicant / Designer / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'
176	Measures to prevent degradation of radar performance at nearby aerodromes (e.g. the removal of infrastructure or the	No	Operation and maintenance	Major accidents and disasters	Design principles / oLEMP	Applicant / Designer / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	use of landscaping bunds).						
177	A pre-fabrication approach will be predominantly used. This approach reduces construction waste, with much less waste produced during unit manufacturing and this is managed by the companies producing the Solar PV Panels, BESS Units, as well as temporary construction site office units, cabling, and, where practicable, Substations.	No	Construction	Waste and materials	Design principles / oCEMP	Applicant / Designer / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'
178	Co-ordination with suppliers enabling them to take / buy	No	Construction	Waste and materials	oCEMP	Applicant / Contractor	Chapter 17: Technical

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	back surplus stock, where practicable.						Aspects to be 'Scoped Out'
179	Purchase of materials pre-cut to length to avoid excess scrap waste generated on-site, where practicable.	No	Construction	Waste and materials	oCEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
180	Request that suppliers use the least amount of packaging possible for materials to be delivered.	No	Construction	Waste and materials	oCEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
181	Ensuring correct storage and handling of goods to avoid unnecessary damage that would result in their disposal.	No	Construction / Decommissioning	Waste and materials	oCEMP / oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'
182	Use of reclaimed materials in the	No	Construction	Waste and materials	oCEMP	Applicant / Contractor	Chapter 17: Technical

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	construction works, where practicable.						Aspects to be 'Scoped Out'
183	Adherence to the waste hierarchy by prioritising waste prevention, followed by the reuse, recycling, and recovery of equipment during the replacement of items. Landfill disposal will be considered only as a last resort.	No	Operation and maintenance	Waste and materials	oOEMP	Applicant / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'
184	All waste management will comply with relevant regulations, and waste will be transported by licensed hauliers to authorised waste management sites with the necessary	No	Operation and maintenance	Waste and materials	oOEMP	Applicant / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	permits for the consigned wastes.						
185	The Proposed Development is expected to generate waste electrical and electronic equipment (WEEE). These items will be recovered and recycled by an authorised reprocessor in compliance with the relevant regulations. To ensure this is done according to 'Best Available Treatment Recovery and Recycling Techniques', a list of up-to-date authorised reprocessors will be established prior to	No	Operation and maintenance	Waste and materials	oOEMP	Applicant / Operator	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	the operation and maintenance phase of the Proposed Development and kept up-to-date.						
186	Batteries must be separated from WEEE streams so they can be recovered, recycled, or disposed of in accordance with the relevant regulations.	No	Operation and maintenance	Waste and materials	oOEMP	Applicant / Operator / (the Battery Manufactur-er or Supplier)	Chapter 17: Technical Aspects to be 'Scoped Out'
187	Components to be decommissioned will be re-used, removed, recycled, recovered, or disposed of in accordance with good practice and market conditions at that time. Where practicable, items will be re-used at the	No	Decommissioning	Waste and materials	oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'

ID	Commitment	Monitoring	Project phase	Relevant aspect(s)	Anticipated commitment securing mechanism	Delivery	Associated supporting documentation
	end of their operational life.						
188	On-site segregation of waste streams to aid with recycling and re-use and the correct storage of materials on-site to avoid damage.	No	Decommissioning	Waste and materials	oDEMP	Applicant / Contractor	Chapter 17: Technical Aspects to be 'Scoped Out'

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Appendix C: Structure and Format of the ES

PINS reference: EN0110048
Revision: 02
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Document control

Revision	Date	Description	Prepared by	Checked by
01	October 2026	Issue	TS	KW
02	October 2026	Issue – updated to reflect minor corrections	TS	KW

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1 Structure and Format of the ES

Table C1-1a: ES Structure – Volume 1

Volume 1: Informative Chapters	
No.	**Chapter title**
1	Introduction
2	EIA Methodology
3	Location and Context of the Order Limits
4	The Proposed Development
5	Alternatives and Design Evolution
6	Planning Policy Context

Table C1-1b: ES Structure – Volume 2

Volume 2: Technical Aspect Chapters	
No.	**Chapter title**
7	Transport and Access
8	Noise and Vibration
9	Air Quality
10	Biodiversity
11	Landscape and Visual
12	Built Heritage
13	Buried Heritage
14	Water Environment
15	Agricultural Land and Soils
16	Greenhouse Gases and Climate Change
17	Socio-economics and Population
18	Cumulative Effects Assessment
19	Summary

Table C1-1c: ES Structure – Volume 3

Volume 3: Supporting Information	
Figures	Figures to support the Chapters in Volumes 1 and 2
Technical Appendices	Technical data and reports to support the Chapters in Volumes 1 and 2

Table C1-1d: ES Structure – Non-Technical Summary

Standalone Document	
Non-Technical Summary (NTS)	Summary of the ES in non-technical language

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Appendix D: Built Heritage Assets

PINS reference: EN0110048
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Revision	Date	Description	Prepared by	Checked by
01	October 2026	Issue	RC / CM	KW
02	October 2026	Issue – updated to reflect minor corrections	RC / CM	KW

Table D1: Grade I and Grade II* Listed Buildings within the 3km study area

Asset name	List entry	Grade	Easting	Northing
Church of St Andrew	1264158	I	550162	317558
Church of St Peter	1264167	I	550212	316879
Church of All Saints	1264202	I	556837	317973
Church of Saint John	1264266	I	553931	315853
Church of SS Peter and Paul	1077890	I	562107	311195
Church of St Germans	1077892	I	559693	314015
Church of St Mary Magdalen	1077896	I	559864	311374
Church of St Mary the Virgin	1342293	I	558264	314404
Church of St Botolph	1077838	I	565302	310904
Church of St Mary	1077301	I	575058	305349
Church of St Martin	1077822	I	568801	306458
Church of St Mary	1077859	I	570976	305439
Church of St Andrew	1077860	I	571217	305687
Church of All Saints	1152173	I	568127	308903
Church of St John the Evangelist	1169766	I	574410	301449
Oxburgh Hall	1342586	I	574256	301227
Church of St Mary	1077676	I	547113	313361
Bell Tower of Church of St Mary	1171875	I	547126	313318
Church of Holy Trinity	1077832	I	570815	309737
Church of St Botolph	1077303	I	576140	305108
Church of St George	1342562	I	576254	302140
Wallington Hall	1342286	I	562723	307588
Church of St Lawrence	1237259	II*	554965	314860
Old Manor Farmhouse	1237330	II*	550217	317041
Church of Saint Mary	1264178	II*	557083	316888
Fitton Oake	1077894	II*	559430	313490
Ruins of Church of St Peter	1152777	II*	560434	313252
The Priory	1152801	II*	559995	311454

Asset name	List entry	Grade	Easting	Northing
St Marys Hall	1304598	II*	558471	314475
St German's Hall	1304623	II*	559619	314164
Barn at College Farm	1077886	II*	563155	308732
Church of St Mary the Virgin	1152535	II*	566117	308009
Church of St Andrew	1342289	II*	563522	308938
Winnold House	1077747	II*	568813	303979
Fincham Hall	1152126	II*	569443	306500
Church of St Mary	1342301	II*	566821	305684
Park Boundary Wall Including Tower and Gateway	1306374	II*	573985	301225
Church of All Saints	1342335	II*	569993	302218
Church of the Immaculate Conception of the Blessed Virgin Mary and St Margaret	1342587	II*	574147	301269
Lovells Hall	1237117	II*	554945	319552
Church of St Michael	1077839	II*	567417	312027
Remains of Abbey of SS Mary Barbara and Edmund	1304912	II*	570721	309810
Stoke Ferry Hall	1077744	II*	570399	299912
Church of St Mary	1077765	II*	565531	303729

Table D2: Scheduled Monuments within the 3km study area

Asset name	Entry	Easting	Northing
Moated site and medieval field system in Church Field 60m north of St John's Church	1009984	553974	315955
Moated site and formal garden remains at Aylmer Hall	1009985	555172	314652
Moated enclosure 230m north-west of Faulkner House	1493528	549717	313992
Moat at the Old Rectory	1464092	561939	310784
Hangour Hill	1003160	575218	308698
Devil's Dyke Beechamwell and Barton Bendish. Section 1km in length West of Smeeth Wood	1003973	574517	308184
Site of St Mary's Church Caldecote	1004034	574455	303480
Moated site of Wormegay Priory fishponds and associated enclosures	1009987	565193	312709
Bowl barrow known as The Mound 700m north-east of Stradsett Hall	1010571	567171	306294
Shouldham Priory with associated water management features a section of a Roman road and a Bronze Age urnfield	1010572	568054	309461
Village cross 50m east of St Mary's Church	1016695	575110	305339
Wayside Cross 550m north-east of St Mary's Church	1016696	575403	305783
Village cross 30m south of Cross Hill Farm	1018107	566400	311815
Moated site 160m north-east of Avenue Farm	1018649	571560	305964
Remains of Barton Bendish medieval settlement immediately west of Abbey Farm	1018650	571815	306168
Motte and Bailey Castle in Wormegay village	1018651	565926	311735
Medieval settlement remains immediately west of All Saints' Church	1020446	567988	308844
Medieval settlement remains north of Kenwick Farm house	1009986	556958	319043
Moated site in Hills and Holes Plantation 30m north-west of Home Farm	1009983	570527	309560

Asset name	Entry	Easting	Northing
Marham Abbey	1016482	570652	309833
Remains of monastic grange with moated site at Grange Farm	1020445	567195	303277

Table D-3: Grade II Listed Buildings within the 2km study area

Asset name	Entry	Grade	Easting	Northing
County Boundary Post	1064545	II	546653	317842
Ingleborough Mill	1077675	II	547382	314986
Footbridge Road Bridge and Sluices	1204893	II	546770	318155
Row of six memorial stones between 7 and 11 metres south of Nave of Church of Saint John	1237212	II	553931	315837
Memorial 7 metres south of Nave of Church of Saint John	1237215	II	553942	315836
Memorial to Robert Scothill 11 metres south of Chancel of St John	1237216	II	553947	315835
Memorial to Martha Hopson 9 metres south of Chancel of St John	1237217	II	553951	315839
Church Farmhouse	1237218	II	554111	315854
Barn Atgrange Farm	1237219	II	553994	315282
Cartshed At Grange Farm	1237220	II	553999	315313
Row of memorial stones between 2 and 12 metres south of Porch of Church of All Saints	1237222	II	556826	317954
Cross base 8 metres south of Porch of Church of All Saints	1237223	II	556832	317953
Barn abutting All Saints House	1237224	II	556787	317943
Memorial 11 metres south of Nave of Church of All Saints	1237242	II	556823	317955
Memorial 13 metres south of Nave of Church of All Saints	1237243	II	556837	317950
All Saints House	1237248	II	556786	317960
Old Vicarage	1237252	II	556842	318031
Barn at Church Farm	1237255	II	556762	318207

Asset name	Entry	Grade	Easting	Northing
Barn adjacent to Ivy House	1237256	II	555450	318292
Islington Hall	1237258	II	557258	316802
Duncans Farmhouse	1237260	II	555419	316115
Sculpture in Churchyard	1237261	II	550127	317590
Princess Victoria Public House	1237262	II	550475	317658
Table tomb 13 metres south of Nave of Church of St Peter	1237263	II	550212	316858
Coach and Horses Inn	1237298	II	555250	315784
Sculpture in churchyard	1237302	II	550132	317592
Memorial 40 metres south of Nave of Church of St Peter	1237323	II	550237	316835
Memorial 19 metres south of Chancel of Church of St Peter	1237324	II	550236	316858
Memorial 20 metres east of north gate of churchyard of St Peter	1237325	II	550183	316896
Dovecot Farmhouse	1237327	II	550141	316905
St Peters Lodge	1237328	II	552491	315814
Windmill	1237329	II	551548	314261
Faulkner House	1237331	II	549892	313777
Townsend House	1237361	II	550196	316664
Memorial 13 metres south of Nave of Church of St Peter	1264171	II	550231	316859
Memorial 1 metre south of Chancel of Church of St Peter	1264172	II	550240	316873
Memorial 21 metres east of north gate of churchyard of St Peter	1264173	II	550184	316897
Forecourt walls of Dovecote Farmhouse	1264174	II	550150	316890
Walled garden at St Peters Lodge including Dovecote	1264175	II	552454	315816
Church Farmhouse	1264176	II	556732	318174
Tilney Hall	1264177	II	556837	317148
Grays Hall	1264179	II	555555	316301

Asset name	Entry	Grade	Easting	Northing
Shepherds Cottage	1264180	II	548595	315904
Daycotts End	1264181	II	550208	317529
memorial to Henry Wright 7 metres south of Nave of Church of Saint John	1264197	II	553933	315838
Memorial 8 metres south of Chancel of Church of St John	1264198	II	553947	315839
Row of memorials 1 to 4 metres south of Nave of Church of St John	1264199	II	553929	315843
The Elms	1264200	II	554033	316046
The Vicarage	1264201	II	553937	315883
Memorial 14 metres south of Nave of Church of All Saints	1264203	II	556843	317948
High House	1264241	II	554114	318430
Walpole St Peter War Memorial	1440076	II	550239	316823
Tilney All Saints War Memorial Cross	1456188	II	556818	317965
Terrington St John War Memorial Cross	1457533	II	553960	315842
Tilney St Lawrence War Memorial	1457896	II	554984	314836
The Gables	1077629	II	563577	313979
Bull Cottage and the alehouse formerly listed as the Bull Inn	1077630	II	563631	313721
Garden wall 35 metres south east of Manor Farmhouse	1077891	II	562009	311133
Gazebo 20 metres south-west of St Germans Hall	1077893	II	559616	314144
1 Surrey Street	1077895	II	559665	314145
Tombstone 6 metres south of Church of St Mary Magdalen Chancel	1077897	II	559882	311363
Stable block 40 metres north-west of St Marys Hall	1077898	II	558434	314527
Bridge House	1152345	II	563630	313421
Toll Bar House	1152779	II	559699	311777
Tombstone 5 metres south-east of Church of St Mary Magdalen	1152796	II	559882	311368

Asset name	Entry	Grade	Easting	Northing
2 Surrey Street	1304588	II	559644	314137
Manor Farmhouse	1304610	II	561979	311144
Bank House	1304615	II	559495	314108
33 Downham Road	1304658	II	561902	310913
garden wall 35 metres south west of manor farmhouse	1342292	II	561955	311129
The Grange	1342303	II	563691	313236
Church cottage including boundary walls railings and beehive shaped stone pillars	1393453	II	559813	311350
Watlington War Memorial	1457162	II	562095	311172
Wiggenhall St Mary Magdalen War Memorial	1457763	II	559852	311351
Wiggenhall St Germans War Memorial	1458450	II	559669	314029
The Old Rectory	1464091	II	561940	310792
Hall House	1077888	II	566168	307961
Castle Road Bridge	1096153	II	565795	311774
Castle Meadow	1152328	II	565832	311773
Village Cross	1152337	II	566394	311813
House 220 metres south-south-east of Hall House	1304703	II	566262	307748
Foremans House	1342290	II	566194	308016
Shouldham Thorpe War Memorial	1456073	II	566103	308014
Wormegay War Memorial	1457765	II	566398	311817
Remains of Church of All Saints	1077299	II	574937	304633
Cross 550 metres north east of Church of St Mary	1077300	II	575400	305780
26 and 27 the Green	1077302	II	575046	305389
Playters Hall	1077821	II	567876	306739
Retaining wall of churchyard of St Martin	1077823	II	568809	306424
Talbots Manor House	1077824	II	568270	306395
Holly House	1077825	II	568876	306406
House 90m west of Australian House	1077826	II	568678	306371

Asset name	Entry	Grade	Easting	Northing
The Old Rectory	1077827	II	568614	306314
Stables at Fincham Hall	1077828	II	569455	306532
Outbuilding to north of entrance to home farm complex including wall to north	1077829	II	570578	309422
Home Farmhouse	1077830	II	570545	309433
Outbuilding to south of entrance to home farm complex	1077831	II	570568	309413
Headstone to allen mills 1.5 m east of porch of Church of All Saints	1077833	II	568115	308895
Colts Hall Barn	1077834	II	567832	308914
House immediately south of Spar including nos 1-3 the Crofts	1077835	II	567700	308875
Barn 50 metres west of Paradise Farmhouse	1077836	II	567116	305812
South lodge to Stradsett Hall	1077837	II	566906	305319
Barton Hall	1077858	II	570916	305586
Avenue House	1077861	II	571452	305802
Dovecote to Old Rectory	1152117	II	568640	306330
The Garden Cottage	1152156	II	570553	309346
Barn at Home Farm 15m east of Home Farmhouse	1152160	II	570568	309438
colts hall	1152184	II	567844	308887
Spar	1152192	II	567707	308887
Alexandra cottages	1152201	II	567453	308858
Paradise Farmhouse	1152268	II	567157	305808
Stradsett Hall	1152283	II	566660	305775
Cattle Gate and bridge over ha-ha 40 metres north-east of Stradsett Hall	1152294	II	566696	305803
k6 telephone kiosk	1277928	II	575110	305352
The old office including Australian House	1304930	II	568771	306395
k6 telephone kiosk	1319465	II	567723	308857
Ivy House	1342298	II	568938	306448

Asset name	Entry	Grade	Easting	Northing
Shrublands	1342299	II	568726	306389
Headstone to Margaret Mills immediately south of that to Allen Mills	1342300	II	568115	308894
Gates to Stradsett Hall including railings	1342302	II	566672	305739
k6 telephone kiosk	1342304	II	571259	305641
Dog kennels 20 metres north-west of Barton Hall	1342313	II	570896	305609
Old post office and adjacent cottage	1342314	II	571254	305677
Barn 100m south-east of playters hall	1342336	II	567926	306707
nelson house pump cottage nelson cottage	1342337	II	568484	306377
28 and 29 the green	1342561	II	575072	305383
Remains of Church of St John	1342599	II	574329	305763
Cross base immediately east of east churchyard wall	1342600	II	575109	305343
White House	1380443	II	568445	306377
Fincham primary school and Old School Fouse	1380533	II	568896	306416
Former National School and boundary wall	1423960	II	567819	308944
Barton Bendish War Memorial	1442368	II	571230	305668
Fincham War Memorial	1447508	II	568825	306434
Shouldham War Memorial	1456811	II	568105	308888
White House	1077268	II	572436	300787
Bridge over River Gadder	1077269	II	574522	301346
Chapel Lodge	1077270	II	574127	301321
Garden wall with towers	1077271	II	574361	301299
The Lodge	1077272	II	574347	301420
Pedestrian gateway approximately 70 metres north east of Oxburgh Hall	1077273	II	574315	301317
Hall Farmhouse	1077274	II	574218	301384
Granary and stables to east of the Poplars	1077820	II	570161	302006
The Poplars	1342315	II	570138	302008

Asset name	Entry	Grade	Easting	Northing
Chantry House	1342585	II	574512	301497
Former stables coach house and attached gate posts	1342588	II	574299	301343
Farmbuildings at White House Farm	1375634	II	572460	300845
Boughton War Memorial	1442166	II	569982	302216

Table D-4: Registered Parks and Gardens within the 2km study area

Asset name	Entry	Grade
Stradsett Hall	1001263	II
Oxburgh Hall	1001010	II

Table D-5: Conservation Areas within the 2km study area

Asset name / Local Authority
Borough Council of King's Lynn and West Norfolk
Tottenhill Row Conservation Area
Shouldham Conservation Area
Shouldham Thorpe Conservation Area
Fincham Conservation Area
Boughton Conservation Area
Stoke ferry Conservation Area
Breckland District Council
Oxborough Conservation Area
Beachamwell Conservation Area

Longmarsh Green Energy

EPL Norfolk Limited

Scoping Report

Appendix E: Desk Studies and Technical Notes

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Contents

Western Cable Route Technical Note

Western Site Desk Study

Eastern Cable Technical Note

Eastern Site Desk Study

Western Cable Route Technical Note

To:	**Logika Consultants Ltd** St. Augustine´s Court, 1 St. Augustine´s Place, Bristol, BS1 4UD	**Date:**	21 October 2026
		Turnkey reference:	0212-TN006i3
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Title: Longmarsh Green Energy Western Cable Route – Land Quality

1 Introduction

This Technical Note has been prepared to consider the potential land contamination risks within the Western Cable Route and to Walpole Substation for the proposed Longmarsh Green Energy (the Proposed Development) as noted in the Scoping Report. A description of the Proposed Development is provided in **Chapter 4** of the Scoping Report.

The primary objective of this Technical Note is to provide a high-level evaluation of the key land quality and potential associated considerations within the Western Cable Route and Walpole Substation and any potential effects. A full Phase 1 Desk Study, also referred to as a Preliminary Risk Assessment (PRA) for the Western Cable Route has not been carried out due to the relatively lower level of ground-related and construction-related risks associated with the Proposed Development, compared with the Western and Eastern Sites. Full Phase 1 Desk Studies have been prepared by Turnkey Regeneration Ltd for the Western and Eastern Sites. These reports should be read in conjunction with this Technical Note:

- Phase 1 Desk Study which was undertaken for the Longmarsh Green Western Site (document reference: 0212-R003i4 dated October 2026).
- Phase 1 Desk Study which was undertaken for the Longmarsh Green Eastern Site (document reference: 0212-R004i4 dated October 2026).

A Technical Note has also been undertaken for the Eastern Cable Route which should be read in conjunction with this Technical Note (document reference: 0212-R005i3 dated October 2026).

2 Proposed Development

The Proposed Development will export and import electricity via a 400kV connection at the Walpole National Grid Electricity Transmission (NGET) Grid Supply Point (GSP).

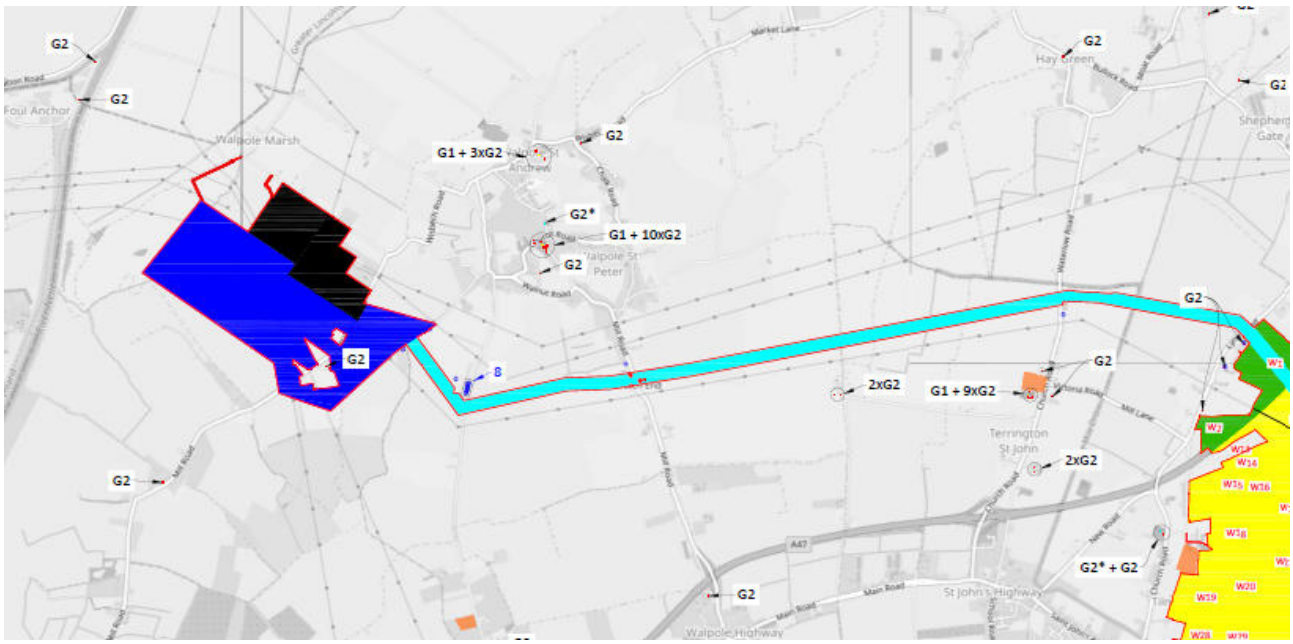
Cabling between Walpole NGET GSP and the Western Site (the Western Cable Route) will predominantly be overhead, with a total length of approximately 8km. Near the Walpole GSP the cabling will be transferred from overhead line to underground cabling at a cable sealing end compound to allow access to the point of connection, as this would be inaccessible with overhead line given the existing infrastructure in this area.

3 Site Setting

The Western Cable Route collectively refers to the area between the Walpole NGET GSP and the Western Site. This area is currently approximately 75m to 100m wide and encompass the approximate possible future footprint of the Western Cable Route. The Western Cable Route will be approximately 1km of buried route and approximately 7km of overhead line. The Western Cable Route extends east from Walpole NGET GSP at Walpole Bank across West Grove North. From here it heads eastwards towards Five Mile Drain, crosses the A47 road. From here it heads south-east towards Moorditch Lane where it meets the Western Site.

A Site Location Plan showing the location of the Western Cable Route of the Proposed Development (plus the Walpole Substation Area) is provided below.

Western Cable Route plus Walpole Substation



Reproduced from Indicative Plan for Western Cable Route dated 24/09/2026 (Document Reference: 192-01-01-H-2-1)

4 Baseline Data Collection

The Study Area for baseline data collection has been defined as extending up to 250m, typically 125m, from the Western Cable Route for land and controlled waters receptors. This Study Area has been adopted for the purposes of this Technical Note and is considered sufficiently conservative to capture off-site receptors with the potential to affect, or be affected by, the Proposed Development.

Given the low sensitivity of the proposed Western Cable Route in relation to land quality, and its use solely for infrastructure purposes, significant effects on land quality receptors are considered unlikely.

To facilitate the production of this Technical Note, the following information sources have been utilised:

- Historical Ordnance Survey Mapping (obtained via the GroundSure® Reports obtained below).
- GroundSure® Reports comprising Enviro Insight and Geo Insight Report (report reference: GS-LSW-9IN-C3F-MUT). The key contents of which are summarised below.
- British Geological Survey (BGS) Mapping and Borehole records.
- Open-Source aerial and street view images including Google Earth®.
- Defra's Open-Source MAGIC website.

It should be noted that the boundaries shown on the historical OS mapping and the Groundsure® Report were based on early design stage boundary plans for the Proposed Development and differ slightly to that shown for the Western Cable Route shown on the location plan above. However, this is not considered to change the findings or data presented in this report due to coverage of the additional areas within the search buffers applied by the Groundsure® Report. Therefore, appropriate baseline data to support this report and conclusion reached is included.

5 Western Cable Route – Baseline Conditions

The National Grid Reference for the centre of the Western Cable Route is 550846 N, 316213 E and occupies an area of approximately 149 hectares. The north-western end of the Western Cable Route comprises the proposed connection, with the existing Walpole NGET GSP lying directly to the north-west.

The substation was originally built in the 1960s and has undergone various phases of upgrade works since its original construction.

The Western Cable Route is predominantly agricultural in nature, largely comprising arable fields and lowland areas. Some residential areas are present close to or adjacent to the Western Cable Route, particularly in proximity to Walpole NGET GSP within the villages of Walpole St Peter and Walpole St Andrew. Some farm buildings and some small pockets of woodland are also present. No significant commercial or industrial development is present on-site. The Western Cable Route is covered by a network of land drains.

Site History

An electricity transformer station is recorded on-site (recorded as dating to the 1980s by GroundSure® but shown on historical mapping to date to the 1960s) and lies directly to the north of the north-western end of the Western Cable Route. Large areas of the Western Cable Route have comprised open, undeveloped land including fields, woodland, allotments and orchards and have remained undeveloped since historical mapping records began. A series of farm buildings and residential properties have also been present on-site, some of which date to the 1880s.

Wider historical unspecified pits, a sewage works and a helicopter landing pad are also recorded within a 125m radius of the Western Cable Route.

Industrial Land Use

Two significant historical pits are recorded by GroundSure® on-site, relating to Fruit Farm Pit for the extraction of clay and shale. Operations at this pit have ceased. The footprint of Fruit Farm Pit extends off-site. Two ponds are recorded on-site by GroundSure® possibly associated with former workings (dating to 1926 and 1950). Various former workings and ponds are also recorded immediately around and adjacent to the Western Cable Route.

Various pylons are present on and around the site relating to existing low overhead lines. Pylons are not considered to present a contamination risk to the Western Cable Route.

There are no records of non-coal mining extraction recorded on-site.

There are no records of historical petrol stations or historical military land recorded on-site or within a 250m radius of the Western Cable Route.

There are historical energy features recorded on-site and approximately 76m to 77m north of the Western Cable Route. All entries relate to Walpole NGET GSP, recorded by GroundSure® as an electricity transformer and electricity substation. At the time of writing, Walpole NGET GSP remained active and was awaiting essential expansion and upgrade works to improve the existing infrastructure.

No further entries of historical energy features are recorded within a 250m radius of the Western Cable Route.

There are no historical garages recorded on-site or within a 200m radius of the Western Cable Route, with the closest off-site record recorded approximately 214m to the north of the Western Cable Route. This entry relates to a garage (dating to 1964 to 1980). There are two records of historical tanks recorded within a 125m radius of the Western Cable Route, recorded approximately 49m and 51m north-east of the Western Cable Route (dating to 1971 to 1992). Four further tanks are recorded between 125m and 250m from the Western Cable Route.

There are twelve waste exemptions recorded by GroundSure® to be located on-site. Eight of these are associated with Ninwood House on Mill Road and relate to the treatment of waste wood and plant matter by chipping, shredding, cutting or pulverising and burning waste in the open. The four remaining exemptions relate to the storage of sludge on-site.

No active, recent or historical landfill sites are recorded by GroundSure® on-site or within 250m of the Western Cable Route. There are no historical or licensed waste sites on-site or within a 250m radius of the Western Cable Route.

There are no sites determined as Contaminated Land under Part 2a of the Environmental Protection Act (EPA) 1990.

Geology and Radon

There are no mapped areas of Made or Worked Ground shown on British Geological Survey (BGS) mapping. Limited Made Ground is potentially present in localised areas associated with the former mineral extraction site, farm and residential buildings, roadways, or tracks, but there is no indication that extensive areas of artificial ground exist. Adjacent Made Ground associated with Walpole Substation is also likely to be present due to the nature of this facility.

The entirety of the Western Cable Route is underlain by Tidal Flat Deposits. The underlying bedrock comprises the Kimmeridge Clay Formation (predominantly Mudstone) within the eastern half of the Western Cable Route and the Ampthill Clay Formation (predominantly Mudstone) within the western half of the Western Cable Route and below Walpole Substation. One rock fault is recorded to cross the site and is recorded as a cementstone bed by GroundSure®.

The adjacent Walpole Substation is also directly underlain by the Tidal Flat Deposits, underlain by the Ampthill Clay Formation (predominantly Mudstone) bedrock.

No natural cavities are recorded on-site. No significant soluble rocks are recorded to be present on-site and dissolution features are unlikely to be present.

No significant risks from radon are recorded on-site by GroundSure®.

The Western Cable Route is recorded as having a moderate risk of running sands and compressible deposits, indicating running sand conditions, compressibility and uneven settlement hazards are probably present. No further ground hazards are recorded.

Hydrogeology

The Western Cable Route is underlain by Unproductive Strata, relating to the Tidal Flat Deposits, the Kimmeridge Clay Formation and the Ampthill Clay Formation. The Western Cable Route is shown as having very low to low groundwater vulnerability.

There are no groundwater Source Protection Zones (SPZs) on-site and no groundwater abstractions recorded on site or within 250m of the Western Cable Route.

Hydrology and Flood Risk

Various land drains are present on-site including Walpole West Drain, Five Mile Drain and Shire Drain, as well as a series of smaller unnamed land drains.

The Western Cable Route lies within three Water Framework Directive (WFD) coastal catchments relating to Lower Nene (2 entries) and North-west Norfolk Rivers Stream.

There are no surface water abstractions recorded on-site or within a 250m radius of the Western Cable Route.

There are no pollution incidents recorded on-site or within a 125m radius of the Western Cable Route.

There are two licensed discharge consents to controlled waters recorded by GroundSure® on-site, both of which relate to historical consents at Walpole St Peter Sewage Treatment Works (STW) for the discharge of sewage discharges (final / treated effluent – not water company) into an internal drainage system. The consents date to 1985 and 1992 and were revoked in 1992 and 2007 respectively. Four further licensed discharge consents are recorded by GroundSure® within a 125m radius of the Western Cable Route. Two of these consents relate to sewage discharges (final / treated effluent – not water company) into a land drain and a tributary of Smeeth Lode. These consents were issued in 2024 and 2007 respectively. Two of these consents are historic and relate to unspecified discharges, with no details on the receiving water specified by GroundSure®.

The Western Cable Route is recorded as being at very low to medium risk of river and coastal flooding, with almost the entirety of the Western Cable Route lying within Flood Zone 2 and Flood Zone 3. No flood defences are recorded on-site. A maximum high risk of surface water flooding and a negligible risk of groundwater flooding are recorded on-site by GroundSure®.

Sensitive Land Uses

No sensitive land uses are recorded on-site or within a 250m radius of the Western Cable Route.

6 Walpole Substation Baseline Conditions

Site Setting

The Walpole Substation includes open agricultural land and the existing Walpole NGET GSP, which was originally built in the 1960s and has undergone various phases of upgrade works since its original construction. There are some residential areas to the east of the site within the villages of Walpole St Peter and Walpole St Andrew and along French Road. Walpole Marsh lies to the north.

Site History

Historically the site is dominated by the electricity transformer station since the 1960s. Prior to this the site comprised undeveloped agricultural land, with Grange Farm and Flower Farm located just to the west and White House and Bank House Farm to the east. There is also a sewage farm to the west and to the north-east with sewage farm settling ponds marked around 500m to the north circa 1975-80.

Geology, Hydrogeology, Hydrology and Ecology

Walpole Substation is underlain by superficial deposits comprising Tidal Flat Deposits and the bedrock is the Ampthill Clay Formation. Both strata are Unproductive Strata.

Walpole Substation does not lie within a groundwater SPZ.

The River Nene (Kindersley's Cut) lies around 750m to the west and north of the Walpole Substation. There are drainage features across the area which link to an unnamed small tributary of the River Nene to the west.

Industrial Land Use

Except for the substation there are no other industrial land uses recorded.

There are no records of historical or active landfills within the boundary of the Walpole Substation within the Groundsure® Report. In addition, there are no active or historical landfills present on-site.

7 UXO Risk

The entire Western Cable Route is identified as being at low risk from Unexploded Ordnance (UXO). In low risk areas, detailed UXO risk assessment is not deemed to be required, and works can proceed with no special precautions.

8 Western Cable Route Risk Profile

The following risk profiles have been deduced from the baseline conditions evaluation carried out for the Western Cable Route. It should be noted that this takes into consideration the nature of the Western Cable Route which will consist of predominantly overhead powerlines, with some underground cabling components including potential HDD below some of the waterways on-site. This assumes minimal excavation works, in terms of both vertical and lateral extent on-site to facilitate the construction of both overhead and below-ground lines.

- The Western Cable Route has some historical industrial land use including the former Fruit Farm Pit. Localised Made Ground and infilling is possible. Walpole Substation has been present directly to the north of the north-western end of the Western Cable Route since the 1960s. Most of the site has remained as open / undeveloped agricultural land since mapping records began, with some residential properties, farm buildings and pockets of woodland, allotments and orchards. The entire Western Cable Route and immediate surrounding area are underlain by Unproductive Strata and has very low to low groundwater vulnerability. The network of land drains is the key controlled waters receptor on-site, providing an important potential pathway / receptor for contaminant mobilisation which would need to be considered. An overall **low** land quality risk has been concluded based on the potential for limited localised contamination to be present on site and risks to the on-site land drains.

- The Substation represents a potential source of contamination due to the ground disturbance during its construction and possible presence of Made Ground of unknown origin. In addition, due to the age of the substation (1960s) there is the potential that transformer oil including PCBs were used in electrical equipment. On this basis a **low to moderate** risk classification for risks to human and controlled waters receptors was concluded.

Any risks associated with excavation and piling operations, including potential impacts on land and groundwater quality, will be managed through the implementation of an outline Construction Environmental Management Plan (oCEMP) and associated piling and foundation works risk assessments. These measures will identify potential environmental risks arising from ground disturbance, excavation and piling activities and establish appropriate mitigation and control measures to prevent or minimise impacts, including the mobilisation of contaminants, soil disturbance and potential pathways to groundwater. All works will be undertaken in accordance with the relevant environmental controls and good practice, and these measures will be secured by a DCO Requirement.

9 Western Cable Route Conclusions

Based on the available baseline information presented within this Technical Note, it is considered unlikely that contaminated materials will be encountered during the groundworks undertaken within the Western Cable Route. It can therefore be concluded that significant land quality risks are not anticipated and that the Western Cable Route is considered to pose an overall low environmental risk. This will be confirmed as part of future ground investigation to support the design of the Proposed Development.

As part of the ground investigation, it is recommended that assessment of topsoil quality on site is carried out and to verify the presence or absence of the identified areas of potential infill indicated by historical mapping, especially where these coincide with any proposed structures. It will be important to confirm specific consideration regarding historical agricultural practices. It may be prudent to verify, through the landowner/farmer and Local Planning Authority (LPA) records, whether treated sewage sludge and pesticides were historically spread on the land within the Western Cable Route. The application of these compounds creates a possible pathway for introducing Per- and Poly-Fluoroalkyl Substances (PFAS), and pesticide compounds into soils. The confirmation of these activities would inform the decision for targeted topsoil sampling topsoil if required. This targeted verification would provide greater certainty in soil quality characterisation whilst ensuring the robust management of materials for possible re-use.

A detailed intrusive ground investigation will be carried out to support the Proposed Development. This is likely to be secured as a Requirement of the Development Consent Order (DCO) to help inform the detailed geotechnical design of proposed structures, foundations, and associated infrastructure. The ground investigation work will inform the design and additional mitigation measures relating to land and groundwater quality, if deemed to be required.

In addition to the above, the implementation of a Discovery Strategy will be considered as part of the oCEMP and should include a procedure for managing unexpected contamination (i.e. a watching brief). If encountered, further mitigation measures such as localised remediation or removal of contamination may be required.

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Phase 1 Desk Study Report

Longmarsh Green Energy (Western Site)

King's Lynn, Norfolk

October 2026

Document Control

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Report prepared for: Logika Group St Augustine's Court 1 St Augustine's Place Bristol BS1 4UD				
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Approved:

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Executive Summary

Site Address and Setting	The Western Site comprises one land parcel of approximately 629 hectares and lies to the west of the River Ouse and north-west of the settlement of Tilney. St Lawrence, in the county of Norfolk, England. The Western Site surrounds consist of agricultural fields, used for arable farming. The A47 runs through the north-western corner of the Western Site, trending north-east to south-west.
Proposed Development	The Proposed Development comprises the construction and installation of solar photovoltaic panels, a data centre campus, Battery Energy Storage Systems (BESS) and associated infrastructure which will allow for the generation of electricity. A full description of the Proposed Development is provided in **Chapter 4** of the Scoping Report.
Site Setting	Based on information published by the British Geological Survey, the Western Site is underlain by superficial geology of Quaternary Tidal flat deposits of clay and silt. The bedrock geology is indicated to comprise Kimmeridge Clay Formation and Ampthill Clay Formation. The former is present in the majority of the Western Site with the latter present in the southernmost section of the Western Site, south of Magdalen Road. The superficial and bedrock geology are designated as unproductive aquifers with low permeability and negligible significance for water supply. There are no groundwater Source Protection Zones (SPZs) noted in, or around, the Western Site.
Site History	The majority of the Western Site is undeveloped and consists predominantly of open fields used for agricultural purposes and isolated woodland. Based on the historical maps, there has not been significant changes to field boundaries or usage since the 1990s. The immediate surrounding land consisted predominantly of open fields. Tilney St Lawrence and farmhouses associated with the Western Site were present at the south-western boundary. Other farmhouses and the village of Islington were present at the eastern boundary. Tilney High End was present to the north of the Western Site, with the A47 running through the north-western corner of the Western Site, trending north-east to south-west.
Environmental Appraisal	Based on the Preliminary Conceptual Site Model and Qualitative Risk Assessment, the potential pollutant linkages have been given a low risk classification for risks to human and controlled waters receptors.
Recommendations	To manage the low risk of contamination, a robust strategy, which includes a Discovery Strategy and an Unexpected Contamination protocol, should be implemented as needed. A limited site investigation is recommended to assess the quality of topsoil present at the Western Site and to verify the presence or absence of the identified areas of potential infill indicated by historical mapping, especially where these coincide with any proposed structures. It is important to confirm historical agricultural practices, particularly the application of treated sewage and pesticides. The confirmation of these activities would inform the decision for targeted sampling and analysis of the topsoil for a suite of Per and Polyfluoroalkyl Substances (PFAS) and other pesticide-related compounds (if

	deemed required). This targeted verification would provide greater certainty in soil quality characterisation whilst ensuring the robust management of materials for possible reuse.

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Introduction

1.1 Background

Longmarsh Green Energy (the 'Proposed Development'), will comprise the construction and installation of solar photovoltaic panels and associated infrastructure which will allow for the generation of electricity across approximately 1,980 hectares (ha), split over two areas (known as the Western Site and Eastern Site), within the Borough of King's Lynn and West Norfolk. This report relates to the Western Site only, a separate report is available for the Eastern Site. A Data Centre Campus, Battery Energy Storage System (BESS) Units and Substations are located within the central part of the Western Site (termed Area B for the purposes of this report), as shown in Figure 2.2 below. A further description of the Proposed Development is provided in Chapter 4: Initial Description of the Proposed Development, of the Scoping Report.

As part of the planning process, a Phase 1 Land Contamination Desk Study (this report) is required to assess the land quality at the Western Site of the Proposed Development.

A location plan is provided as Figure 2.1 below and the Western Site boundary is presented in **Annex A**.

1.2 Purpose of the Report

The purpose of this report is to establish the environmental status of the Western Site and to provide a preliminary assessment of any potential land contamination issues. The assessment will aim to identify potentially significant environmental issues associated with the Western Site, which could result in either statutory liabilities or potential risks associated with the Proposed Development.

This will be achieved through the following scope of works:

- Establish the environmental setting and context of the Western Site.
- Determine the historical land use of the Western Site.
- Review existing reports, where available.
- Develop a preliminary Conceptual Site Model (CSM).
- Conduct a preliminary risk assessment of potential contamination at the Western Site.
- Make recommendations for further works (if necessary).

Depending on the findings of this desk study, ground investigation *could be* required to further define/confirm land quality and assess the need for remediation. Note that the preliminary risk assessment does not assess current use but only the planned future use, which is subject to the Development Consent Order (DCO) application.

Geotechnical assessment is outside the scope of this desk study; however, the factual data/information will be useful for any geotechnical or structural requirements.

1.3 Legislative Context

The information obtained from desk-based information has been used to develop a preliminary CSM and risk assessment which examines the potential for contaminant-pathway-receptor linkages for human and environmental receptors.

Overall, this "precautionary" approach is designed to give confidence to future site users, the developer and the local authority/Planning Inspectorate that the development site, in the words of the National Planning Policy Framework 2026, is:

> *"Sites proposed for development should be suitable for their proposed use taking into account:*

a) *Ground conditions, including any risks arising from land instability or contamination (whether due to natural hazards or current and former activities such as mining or fuel storage); and*

b) *The extent to which any such risks can be mitigated, and the potential impacts on the natural environment arising from remediation."*

It is also our objective to show that the development, at a minimum, will leave the Western Site in a condition where it is not capable of being determined as' Contaminated Land' under Part 2A of the Environmental Protection Act 1990 and to provide sufficient information to satisfy potential planning conditions that would require an assessment of risk in line with 'Land Contamination: Risk Management' (issued October 2020)[1].

This report has been prepared by and reviewed by Competent Persons.

1.4 Information Sources

The following information sources have been utilised in this report:

- Site photographs (presented as **Annex B**).
- Historical Ordnance Survey Mapping obtained via the Groundsure® reporting obtained below.
- Groundsure® Reports comprising Enviro Insight and Geo Insight referenced GS-I5W-ZH6-FR8-JE1 (key contents are summarised below).
- British Geological Survey (BGS) Borehole Records (www.bgs.co.uk).
- BGS mapping sheet 90 'Alford' (1:50,000 scale) 'Solid and Drift' dated 1984.
- Open-Source aerial and street view images including Google Earth®.
- Defra's Open-Source MAGIC website (https://magic.defra.gov.uk/magicmap.aspx).
- Unexploded ordnance survey information (https://zeticauxo.com/guidance/risk-maps/).
- Environment Agency Historic Landfill Data (https://www.data.gov.uk/dataset/17edf94f-6de3-4034-b66b-004ebd0dd010/historic-landfill-sites)

It should be noted that the boundaries shown on the historical OS mapping and the Groundsure® Report were based on early design stage boundary plans for the Proposed Development and differ slightly to that shown for the Eastern Site in **Annex A**. However, this is not considered to change the findings or data presented in this report due to coverage of the additional areas within the search buffers applied by the Groundsure® Report. Therefore, appropriate baseline data to support this report and conclusion reached is included.

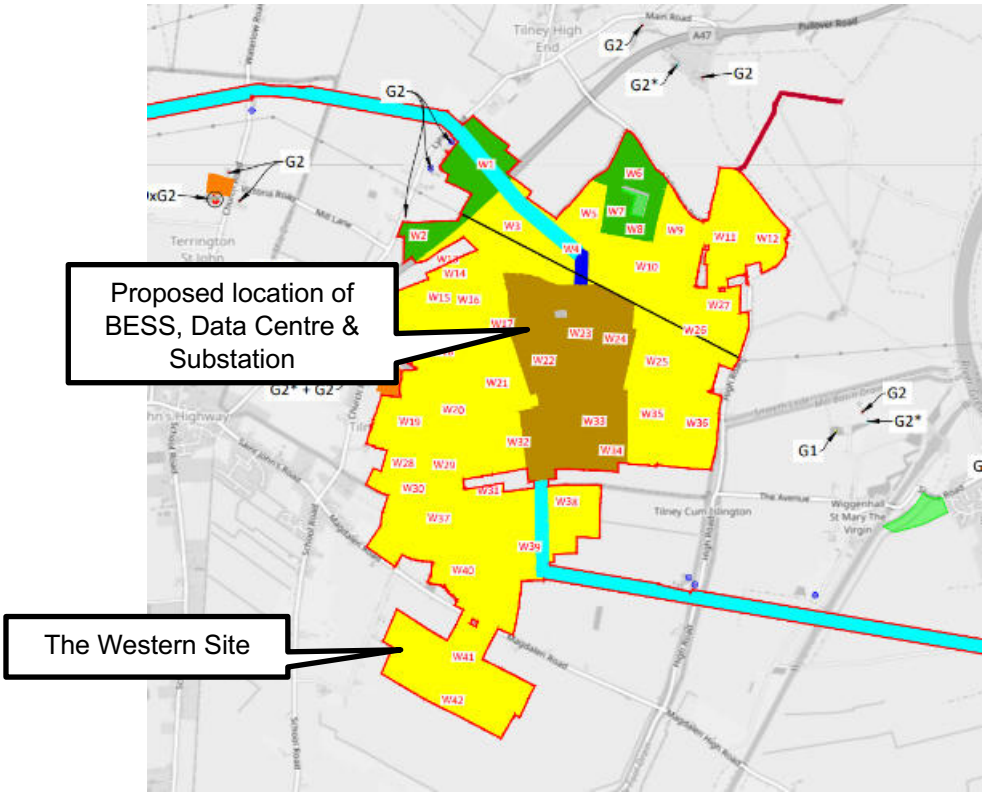
[1] This updated guidance is based on 'The Model Procedures For The Management Of Land – Contaminated Land Report' (CLR11); the scope, framework and purpose remain the same.

2. Site Setting

2.1 Site Status

The Western Site comprises one land parcel and lies to the west of the River Ouse and north-west of the settlement of Tilney. St Lawrence, in the county of Norfolk, England. It is situated approximately 7 miles south-west of King's Lynn. The location of the Western Site is shown in **Figure 2.1**. A Data Centre Campus, Battery Energy Storage System (BESS) Units and Substations are proposed to be located in the brown shaded area as shown in **Figure 2.1**.

Figure 2.1 Site Location Plan



Reproduced from drawing 192-01-01-H-2-2 Longmarsh Green Energy – Indicative Plan - Western Area Dated 24/09/26. Not to Scale.

2.2 Site Description

2.2.1 The Site

The Western Site lies at a ground elevation of approximately 1m to 3m above Ordnance Datum (AOD), appearing mostly level when on-site.

2.2.2 The Surrounding Area

In general, the Western Site is surrounded by roads, open fields and associated farmhouses.

North: Open fields and Tilney High End

South: Open fields

East: Open Fields and the River Great Ouse.

West: Open Fields, Tilney St. Lawrence and Terrington St. John.

2.3 Site History

Historical Ordnance Survey (OS) mapping for the Western Site area has been reviewed. These maps and plans date from 1884 OS County Series to 2025 OS Plans. Open-source aerial images were used to identify details from the past 20 years. The key points of the historical development of the Eastern Site and surrounding area are summarised below in Table 2.1 and this is based on the historic plans received as part of the Groundsure® Report.

Table 2.1 Key Points of Site Development History

Dates	Description
1884 - 1888	On-site: Predominantly open fields with associated farmhouses. A Kiln is noted in the centre of the Western Site, around some farm structures and a small pit (this is marked as a pond in later mapping). Crabb Lane runs through the southern central area of the Western Site, trending east to west. Moorditch Lane runs through the northern central area of the Western Site, trending east to west. Salgate Farm is located on the central eastern boundary of the Western Site. Three Acres woodland is in the northern section of the Western Site. Drains noted within open fields. There are also small pond features across the Western Site (e.g. west of Three Acres Wood), which are not shown on later mapping. Sea Bank (embankments feature) shown running north-west to south-east along the boundary in the north-eastern section of the Western Site. Off-site: Predominantly open fields with associated farmhouses. Roads and isolated houses present.

Dates	Description
	Tilney cum Islington village is beyond the south-eastern boundary of the Site. Tilney High End village to the north of the Site. Smithy shown approx. 150m west of the Site. Similar to the Site itself, there are small pond features shown on early mapping that is not shown on later mapping, including several in the Spice Hills area, along Black Ditch Drain at the southern boundary of the Site.
1888 - 1927	<u>On Site:</u> No significant changes noted, Western Site is predominantly open fields. Allotments are shown in the north-western and south-eastern part of the Western Site circa 1925-27. There are also orchards shown across large areas of the Western Site presumed to be associated with a fruit farm to the north. <u>Off Site:</u> Minor changes in residential developments and layout, but predominantly open fields and associated farmhouses.
1927 - 1974	<u>On-site:</u> The Kiln and structures are present until 1974 and removed thereafter. Pond associated with the Kiln shown until at least 1994 (end of the large-scale mapping available for this area). Structures removed from mapping later. Otherwise, no major changes. The Sea Bank shown previously in the north-eastern corner of the Western Site is now shown as 'the course of' Sea Bank. <u>Off-site:</u> Original expansion and development of houses associated with Tilney St. Lawrence village in the south-west. Smithy not shown on 1927 mapping. Fruit Farm to north becomes Duncan Farm 1971.
1974 - 1993	<u>On-site:</u> Gas valve compound is noted in the north-eastern part of the Western Site. Minor changes in field layout, but no other significant change noted. Allotments no longer marked in north-western or south-eastern section. Orchards also no longer shown to be present (assumed to be associated with the earlier change of use of the Fruit Farm to Duncan Farm). <u>Off-site:</u> On-going development of roads and residential areas. Pumping station (including an electricity sub-station and tanks) shown on 1974 map located off High Road at end of Smeeth Lode (Drain) ad Mill Basin (Drain). Ponds/surface water features at Spice Hill no longer shown in 1974 mapping and later mapping (possibly infilled).

Dates	Description
	Nursery around 30m west.
1993 - 2001	On-site: The A47 road is identified in the northern section of the Western Site, trending north-east to south-west, with removal of some residential properties from the area. The A47 is constructed between 1993 and 2001. Gas valve compound still present, in north-east. Pylons shown trending north-west to south-east across centre of Western Site on mapping from the early to mid-1990's. Off-site: No major changes, predominantly open fields and associated farmhouses, with villages and minor residential development
2015	On-site: Gas valve compound, originally in the north-eastern part of the Western Site is no longer present, with structures also removed. Off-site: No major changes.
2015 - 2025	On-site: No major changes. Off-site: No major changes
2025	On-site: No major changes.
1984 – 2020 Aerial Photos	On-site: As with previous years, the Western Site is shown to consist predominantly of open fields used for agricultural purposes. There are a few isolated woodlands within the northern section of the Western Site and its boundaries. Colouration of fields change from brown to green likely in line with weather and possible agricultural work. Off-site: The area surrounding the Western Site does not appear to change significantly throughout the time range.

2.3.1 Site History Summary

Most of the Western Site is undeveloped comprising open fields used for agricultural purposes and isolated woodlands. Based on the historical maps, there has not been significant changes to field boundaries since the 1880s. There is evidence of small, localised areas of surface workings (pits) or ponds that may have been infilled.

The immediate surrounding land comprises open fields and woodland. The Western Site is abounded by villages in the north, west and south, with the closest being Tilney St. Lawrence in the south-west. Only a small number of potentially historic contaminative uses have been identified from the historical

maps within 250m of the Western Site including a Smithy, Nursery, Unspecified Tanks and Pumping Station with an Electrical Substation and Tank.

2.4 Environmental Setting

The ground conditions for the Western Site and controlled waters vulnerability are summarised within **Table 2.2**.

Table 2.2 Ground Conditions

Geology	Based on information published by the British Geological Survey, the Western Site is underlain by superficial geology of Quaternary Tidal flat deposits of clay and silt. The bedrock geology is indicated to comprise Kimmeridge Clay Formation and Ampthill Clay Formation. The former is present in most of the Western Site with the latter present in the southernmost section of the Site, south of Magdalen Road. According to the Groundsure® report, there are 10 no. historical boreholes recorded on the Western Site, with depths from 3m - 13m. All boreholes confirm the anticipated sequence of Tidal Flat Deposits over Kimmeridge Clay in the north. One borehole is present outside of the Western Site in the south, which confirms Tidal Flat Deposits over Ampthill Clay Formation. Groundwater was recorded in the Tidal Flat Deposits. Another 30 no. boreholes were identified within 250m of the Western Site boundary. Further information is provided in the Groundsure® report.
Hydrogeology, Aquifer Classification and Groundwater Abstractions	According to the Groundsure® report, the superficial and bedrock geology are designated as unproductive aquifers with low permeability and negligible significance for water supply. Both superficial aquifers are classified as being of unproductive vulnerability regarding ability to transmit pollution to groundwater. There are no groundwater Source Protection Zones (SPZs) identified within or around the Western Site. There is no potable water abstraction point within the Western Site, or within 250m of the Western Site There are no groundwater abstraction wells recorded on-site with one recorded over 500m of the Western Site boundary. There are no records of pollution incidents on-site and three incidents reported within 250m of the Western Site boundary. These varied from minor to significant in the water category, with no impact to minor with respect to the land. According to the Groundsure® report, no groundwater body is present on the Site.
Surface Waters	According to the Groundsure® report, there are multiple surface water bodies on the Western Site, but these relate to drainage systems which extend across the Western Site.

	There are no surface water abstraction points recorded within 1km of the Site. The flood maps presented within the Groundsure® Report show that the Western Site is predominantly located within 'Flood Zone 3' and 'Flood Zone 2' areas recorded to be present within the southern central part of the Western Site. 'Flood Zone 2' is described as "*covering land between Flood Zone 3 and the extent of the flooding from rivers or the sea with a 1 in 1000 (0.1%) chance of flooding each year*". 'Flood Zone 3' is described as "*covering land with a 1 in 100 (1%) or greater chance of flooding each year from rivers or a 1 in 200 (0.5%) or greater chance of flooding each year from the sea"*. Localised areas across the Western Site are shown to be at risk from surface water flooding (1 in 30-year event). With respect to groundwater flooding, the Site is indicated to have a low probability of groundwater flooding.
Ground Stability	Groundsure® records suggest low risk from shrinking or swelling clay ground for the Western Site. The Western Site has a moderate risk from running sand conditions. For risk of compressible deposits, the risk is considered moderate. The Western Site is at negligible risk of collapsible deposits and very low risk from landslides. As regards ground dissolution of soluble rocks, it is at a negligible risk.
Mining and Mineral Extraction	The Groundsure® records, however, indicate historical surface ground workings to have been, or be, present on-site as recorded in the BritPits database maintained by the British Geological Survey. These relate to workings of clay and shale. There are 4 no. records for on-site: 2 no. Fruit Farm Pit (ceased), Aylmer Hall Pit (ceased), Salgate Field Pit (ceased) and Aylmer Hall Kiln (ceased). There are also 5 no pond features on-site, recorded from OS mapping, which could indicate surface ground workings, including notably those around the Spice Hills area in the southern part of the Western Site. A desk-based study and site walkover was undertaken to assess these features. It was noted in the site walkover that these extraction sites are not active, and there was no visible surface evidence of their workings being present. There were further surface ground workings noted within 250m of the Western Site boundary.
Sensitive Land Uses	The Western Site is within a Sites of Special Scientific Interest (SSSI) Impact Risk Zone. This zone was developed to allow rapid initial assessment of the potential risks to the SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. One SSSI is present within the northern section of the Western Site, Islington Heronry, a broadleaved and mixed woodland in favourable condition.

Ground Gas Radon	The Western Site is not located within a radon affected area, as less than 1% of properties are above the action level. No radon protection measures are highlighted as being required.
Unexploded Ordnance (UXO) Risk	The Zetica[2] online maps indicate that the Western Site is at low risk from UXO.

2.5 Regulatory Databases

2.5.1 Permits Consents and Authorisations

A summary of pertinent environmental information related to the Western Site is presented in **Table 2.3**. This is based on a full list of permits, consents and authorisations including discharge consents, pollution incidents and other environmental information, included in the Groundsure® Report.

Table 2.3 Factors Affecting the Site's Environmental Status

Feature	No. of entries within 250m of the Site	Status
Historical industrial land uses	28	Four on-site records related to an unspecified tank, unspecified kiln, unspecified level and gas valve compound. The remaining uses relate to various historical uses around the Western Site including unspecified pit, nursery, smithy, pumping station and unspecified heap.
Current Industrial Sites	5	On-site records are related only to the overhead pylons on-site, trending south-east to north-west in the central northern section of the Western Site.

2.5.2 Landfill Sites

There are no records of historical or active landfills within the boundary of the Western Site within the Groundsure® Report or other available information. In addition, there are no historic or active landfills present within 500m of the Western Site.

There is a record of 33 waste exemptions on the Western Site, relating the storage of sludge and other farm activities.

2.6 Site Walkover Summary

An engineer from Turnkey undertook a site walkover between 5th and 7th May 2026. Photographs are presented in **Annex B**, with a photo location drawing.

The Western Site in its entirety currently consists of agricultural fields, isolated woodland and extensive drainage ditches. The Western Site is bisected in the north by the A47, which trends north-east to south-west.

[2] this information is a pre-desk study assessment retrieved from a free online resource https://zeticauxo.com/guidance/risk-maps/

Access is comprehensive across the Western Site with the use of Magdalen Road, Lynn Road, Moorditch Lane and Crabb Lane, to access the fields.

Most of the fields are bounded by drainage ditches with water observed in most drains. The drains vary in depth from 1 to 3m. Water depth ranged from 0 – 0.5m.

There was no observation of contamination recorded during the walkover survey. There was no evidence of historical tanks, surface excavation workings or gas valve compounds.

Overhead powerlines are present in the central northern part of the Western Site.

The historic kiln noted at the centre of the Western Site from mapping and associated pond were not identified on the site walkover.

Desiccation cracking was noted throughout the Western Site, this is likely related to farming activities and cohesive materials not being compacted, rather than movement related. Photos shown within **Annex B**.

Farm buildings were predominantly noted outside of the Western Site boundary, with very few being within the Western Site bounds.

2.7 Previous Site Investigation Information

Turnkey has not been provided with any previous site investigations for the Western Site, either focused on land contamination or geotechnical.

3. Preliminary Environmental Risk Assessment

3.1 Introduction

The risk posed by contaminants in soil or groundwater will depend on the nature of the hazard, the probability of exposure, the pathway by which exposure occurs, and the likely effects on the receptors. A contaminant is defined as a substance that has the potential to cause harm, while a risk is considered to exist if such a substance is present in sufficient concentration to cause or potentially cause significant harm and a pathway exists for a receptor to be exposed to the substance.

The following sections discuss all the identified potential sources, pathways and receptors in the context of the Proposed Development and plausible pollutant linkages which may represent a risk to identified receptors such as human health and/or controlled waters (e.g. surface waters and groundwater) from the data gained from the desk study and site walkover. At this stage the assessment is qualitative and aimed to determine all pollutant linkages, irrespective of significance or allowing for uncertainty.

Three potential contaminant impact scenarios exist for any given site; these are:

- The site impacting upon itself;
- The site impacting on its surroundings; and
- The surroundings impacting on the site.

3.2 Preliminary Conceptual Site Model

A Source – Pathway – Receptor assessment has been undertaken for the Western Site based on the information provided in the preceding sections. Source, pathway and receptors are defined as:

- Sources (S): These are potential or known sources of contamination that may relate to a former land use or present site feature or process (e.g., fuel storage tanks).

- Pathways (P): A pathway is defined as a mechanism or route by which a contaminant comes into contact with, or otherwise affects, a receptor. Pathways by which the identified receptors may be impacted upon in the context of the Proposed Development.

- Receptors (R): Receptors are defined as people, living organisms, ecological systems, controlled waters, atmosphere, structures and utilities that could be adversely affected by contaminant(s).

The preliminary CSM is presented as **Table 3.1**, which provides the site-specific sources, pathways and receptors. Of note is the lack of contaminant sources based on the desk-based information, nevertheless on a conservative basis, some historical and recent uses of the Western Site have been considered as a potential source of contamination.

The desk study research and site walkover indicate that the Western Site was undeveloped and consists predominantly of agricultural fields until the present day.

Table 3.1 Preliminary Conceptual Site Model

Source*	Pathway	Receptors
S1: On-site: historical and current site uses, most notably possible agricultural uses (including possible sludge spreading and fertiliser storage and spreading), ground workings, unspecified tanks, former kiln, orchards and gas valve compound. Made ground was not indicated to be present in the records reviewed, however there is potential for it to be encountered in areas close to farm buildings, areas of historical allotments, localised infrastructure development (e.g. bases of overhead power lines) and backfilled historic surface excavations. The potential for made ground of some types to generate hazardous ground gases. Possible contaminants to include – agrochemicals, fuel oils, heavy metals, asbestos containing materials, pesticides, polyaromatic hydrocarbons (PAH), possible per- and polyfluoroalkyl (PFAS) and hazardous ground gases (carbon dioxide and methane).	**P1:** Direct contact, incidental ingestion and inhalation/respiration of windblown soils/particulates	**R1**: Construction workers / general public
		R2: Future Site users
	P2: Contaminant leaching, vertical and lateral migration into groundwater and surface water drains	**R3**: Unproductive Aquifer – Superficial and Bedrock geology
		R4: Surface waters (drains)
	P3: Migration and accumulation of ground gases in enclosed spaces	**R1**: Construction workers / general public
		R2: Future Site users
		R3: Buildings and structures associated with Area B of the development

Source*	Pathway	Receptors
S2: Off-site: historical and current off-site uses, most notably agricultural land and farm buildings, unspecified tanks, and unspecified pits and ground workings around the Western Site. Possible contaminants to include – agrochemicals, pesticides, heavy metals, fuel oils, PAHs, possible (PFAS) substances and hazardous ground gases (carbon dioxide and methane).	**P4:** Leaching and permeation through soil profile and migration to groundwater and surface water	**R1**: Unproductive Aquifer – Superficial and Bedrock geology
		R2: Surface waters (drains)
	P3: Migration and accumulation of ground gases in enclosed spaces	**R3**: Construction workers / general public
		R4: Future Site users
		R5: Buildings and structures associated with Area B of the development

** The Source – Pathway - Receptor linkage outlined above is currently based on a general overview of the historical and current uses of the Site. If deemed required, it can be expanded and may be redefined following future assessments, as additional information on ground conditions becomes available.*

3.3 Preliminary Qualitative Risk Assessment

At this stage, the method for risk evaluation is qualitative and the risk classification rationale is explained in **Annex C** and the preliminary qualitative risk assessment (QRA) provided in **Annex D**.

3.3.1 Review of Potentially Significant Pollutant Linkages

Based on the preliminary CSM and QRA, the potential pollutant linkages have been given a low risk classification. For clarity, this includes all human and controlled waters receptors, subject to this planning-driven Desk Study.

Significant sources of contamination have not been identified at the Western Site. However, there is potential for low level contamination to be present within the topsoil, associated with spreading of sludges and pesticides on fields – contaminant buildup may occur over time. Although topsoil may be stripped as part of any future development, it is possible this may be reused in landscaping areas; thus, the testing of topsoil is recommended to ensure confidence in its safe reuse.

In line with the above, despite the low risk classification, a limited site investigation is recommended to assess the quality of topsoil present at the Western Site particularly around the location of the redundant agricultural fertilizer tanks.

In addition, a Discovery Strategy protocol should be included in the Outline Construction Environmental Management Plan (oCEMP) to ensure that contamination identified during construction is assessed by a specialist in land contamination. This will include but not be limited to stopping works in the area where any unexpected contamination is identified and ensuring the identified contamination does not pose a risk until an environmental specialist undertakes an assessment and a method is agreed to deal with the identified contamination. Procedures for dealing with unexpected contamination should also be developed and included in the Discovery Strategy.

4. Conclusions and Recommendations

4.1 Conclusions

The Western Site is currently made up of agricultural fields and isolated woodland and is broadly level with a series of drainage channels throughout.

Based on information published by the British Geological Survey, the Western Site is underlain by superficial geology of Quaternary Tidal flat deposits of clay and silt.

The bedrock geology is indicated to comprise Kimmeridge Clay Formation and Ampthill Clay Formation. The former is present in majority of the Western Site with the latter present in the southernmost section of the Western Site, south of Magdalen Road.

There are no groundwater SPZs within the site boundary or surrounding area, with the superficial and bedrock geology designated as an unproductive aquifer.

There is no potable water abstraction point within the Western Site, or in the surrounding area.

Based on the historical maps, majority of the Western Site has been open fields since the late 1880s and likely used for agricultural purposes around the period.

The immediate surrounding land consisted predominantly of open fields and woodland. Villages abound the Western Site, with Tilney St. Lawrence the closest, on the south-western boundary.

Based on the preliminary CSM and QRA, the potential pollutant linkages have been given a low risk classification for risks to human and controlled waters receptors.

4.2 Recommendations

Whilst the risk of encountering significant contamination has been assessed as low, the following recommendations are provided to ensure robust risk management during the development.

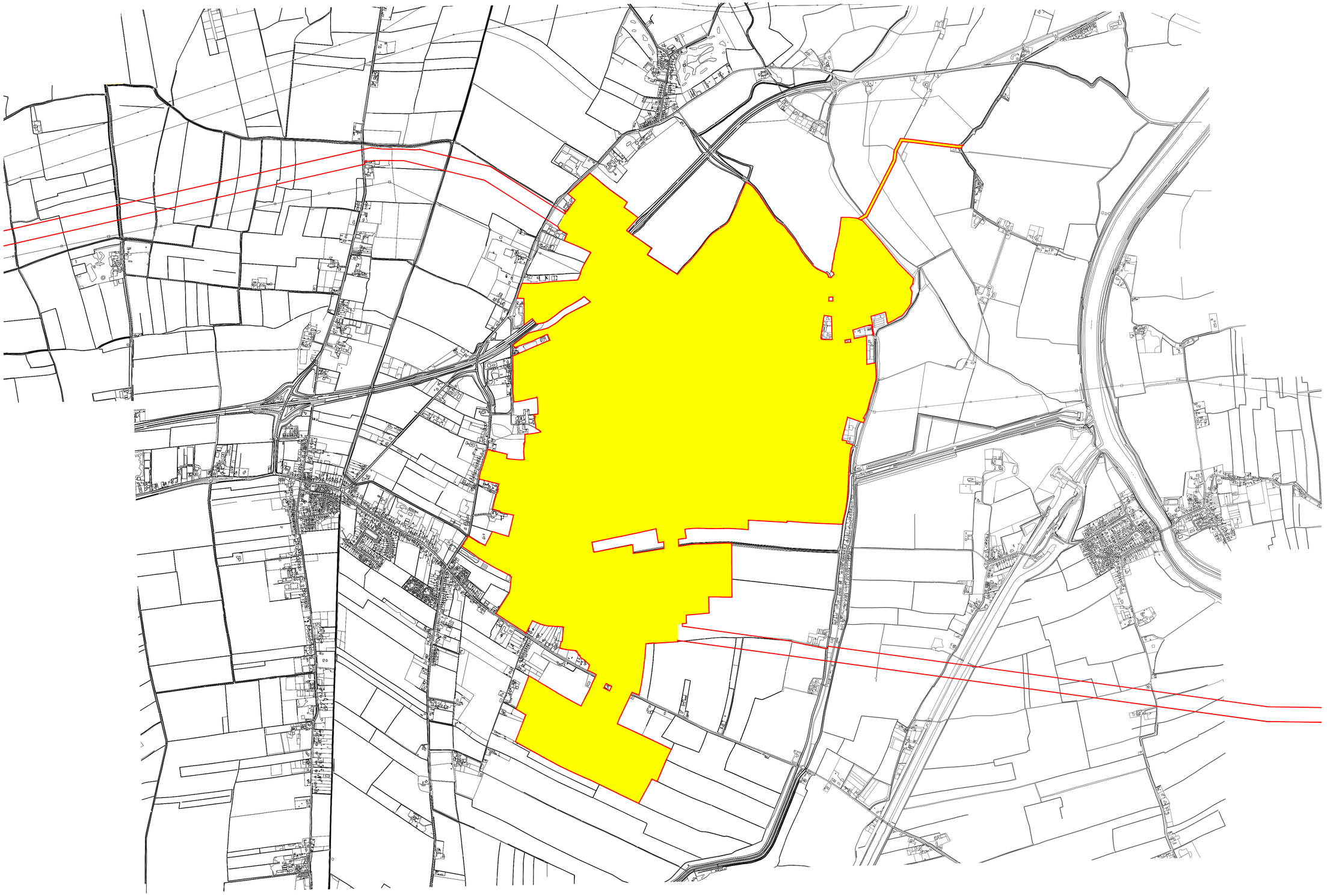
- Despite the low risk classification, a limited site investigation is recommended to assess the quality of topsoil present at the Western Site, particularly around the location of the redundant agricultural fertilizer tanks and also to verify the presence or absence of the identified areas of potential infill indicated by historical mapping, especially where these coincide with any proposed structures.
- Despite the low risk classification for PFAS and pesticide sources on the Western Site, it is important to confirm specific consideration regarding historical agricultural practices. It may be prudent to verify, through the landowner/farmer and local authority records, whether treated sewage sludge and pesticides were historically spread on the land. The application of these compounds creates a possible pathway for introducing PFAS and pesticide compounds into soils. The confirmation of these activities would inform the decision for targeted sampling and analysis of the topsoil for a suite of PFAS and pesticide compounds (if deemed required). This targeted verification would provide greater certainty in soil quality characterisation whilst ensuring the robust management of materials for possible reuse.
- Implementation of a Discovery Strategy (as needed) - this should be included in the oCEMP to ensure that any contamination identified during construction is assessed by a specialist in land contamination. This will include but not be limited to stopping works in the area where any unexpected contamination is identified and ensuring the identified contamination does not pose a risk until an environmental specialist undertakes an assessment and a method is agreed to deal with the identified contamination.
- Unexpected Contamination Protocol – a clear protocol for dealing with unexpected contamination should be established, as needed. Similar to the Discovery Strategy, this will

typically include immediate cessation of works, notification of the Project Manager and engagement of a land contamination specialist and their assessment of the contamination.

- Demolition Plans – for removal of any existing agricultural structures, a specific plan should be developed.

Annex A – Western Site Boundary

North



For information purposes only.
Not for construction

0m 250m 500m 750m 1000m

Notes:

Key:

- Longmarsh Green Order Limits
- Western Site

Evolution Power Holdings Ltd
The Core
Gore Cross Business Park
Bridport
Dorset DT6 3FH
Email: energy@evolutionpower.co.uk
www.evolutionpower.co.uk

©Evolution Power Ltd.

Project Name:
Longmarsh Green

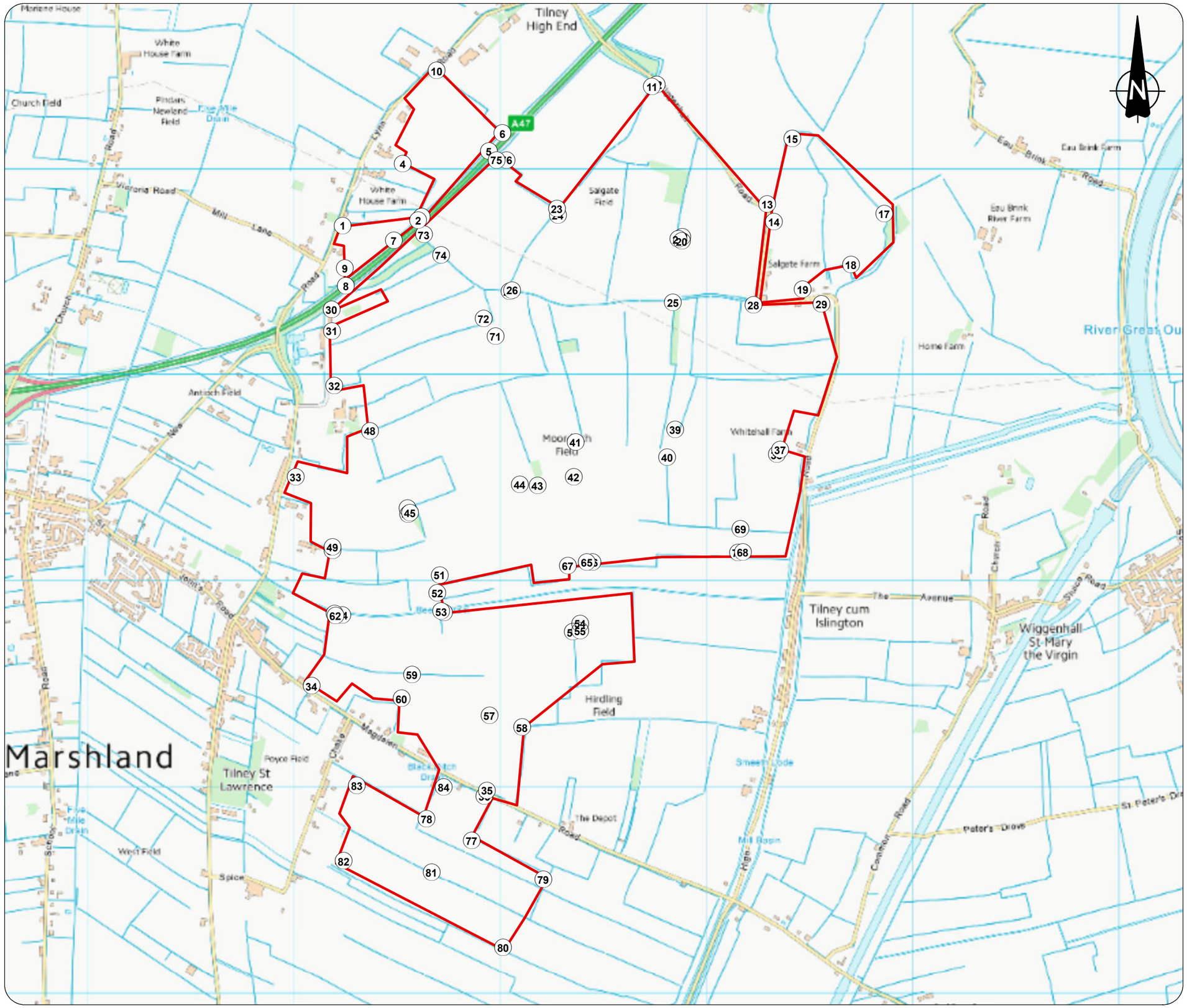
Document Name:
Area Breakdown - Western Site

Document Reference #:
192-01-01-J-4

Scale: 1:12,500@A1 Issue: 01

Produced:	Checked:	Date:
RC	##	08/07/2026

Annex B – Site Photographs



REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	15/05 2026	First Issue	JS	MPS	DR

LEGEND

Site boundary

1 Photograph location

0 250 500 750 1,000 m

Scale at A3: 1:18,500

Client
Logika Consultants Ltd

Project
Longmarsh Green (West Site)

Title
Figure 2
Photo Locations

Turnkey Regeneration
2 Caffyn Place
Broadbridge Heath
Horsham
West Sussex
RH12 3XH
Tel: 07540 295282
dave.rutherford@turnkeyregeneration.com
www.turnkeyregeneration.com

Drawn	Checked	Approved	Revision
JS	JW	DR	00
Date		Scale	Sheet Size
May 2026		1:18,500	A3

Drawing Number
0212-002-00

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ANNEX B - LONGMARSH GREEN (WEST SITE) PHOTOGRAPHS



Picture 1 – facing south east



Picture 2 – facing south west



Picture 3 – facing north east



Picture 4 – facing south east



Picture 5 – culvert, facing south east



Picture 6 – facing south west



Picture 7 – gas main location, facing south east



Picture 8 – facing north east



Picture 9 – dessication cracking noted throughout site, likely related to farmland activities and uncompacted ground



Picture 10 – facing south east



Picture 11 – facing south west



Picture 12 – facing south east



Picture 13 – facing west



Picture 14 – facing north



Picture 15 – facing south east

Picture 16 – Photo corrupted and therefore not included.



Picture 17 – facing south



Picture 18 – facing north



Picture 19 – facing north west



Picture 20 – facing south

ANNEX B - LONGMARSH GREEN (WEST SITE) PHOTOGRAPHS



Picture 21 – facing south west



Picture 22 – gravel stockpile, possibly for re-use



Picture 23 – facing north west



Picture 24 - facing south west



Picture 25 – facing south



Picture 26 – facing north west



Picture 27 – facing south



Picture 28 – facing south



Picture 29 – facing south



Picture 30 – facing north east



Picture 31 – facing east



Picture 32 – facing east



Picture 33 – facing south east



Picture 34 – facing north east



Picture 35 – facing north



Picture 36 – facing south west

Picture 37 – Photo corrupted and therefore not included in report



Picture 38 – facing south



Picture 39 – facing north



Picture 40 – facing south

ANNEX B - LONGMARSH GREEN (WEST SITE) PHOTOGRAPHS



Picture 41 – facing north west



Picture 42 – facing south west



Picture 43 – potential waste stockpile but likely re use.



Picture 44 - facing north



Picture 45 – facing west



Picture 46 – plant storage and hardstanding



Picture 47 – facing north



Picture 48 – facing east



Picture 49 – facing north



Picture 50 – facing south



Picture 51 – facing east



Picture 52 – facing west



Picture 53 – facing west



Picture 54 – facing east



Picture 55 – facing south



Picture 56 – facing west



Picture 57 – facing south west



Picture 58 – facing north east



Picture 59 – facing north



Picture 60 – facing south east

ANNEX B - LONGMARSH GREEN (WEST SITE) PHOTOGRAPHS



Picture 61 – facing east



Picture 62 – facing south east



Picture 63 – facing north west



Picture 64 – facing north east



Picture 65 – facing west



Picture 66 – facing east



Picture 67 – facing south west



Picture 68 – facing north east



Picture 69 – facing north west



Picture 70 – facing west



Picture 71 – facing south



Picture 72 – facing west



Picture 73 – facing east



Picture 74 – facing south west



Picture 75 – facing south west



Picture 76 – facing south



Picture 77 – facing south



Picture 78 – facing south west



Picture 79 – facing south west



Picture 80 – facing north west



Picture 81 – facing south west



Picture 82 – facing east



Picture 83 – facing south east



Picture 84 – facing south west

Annex C – Risk Classification Rationale

Identification of Unacceptable Risk

The method for risk evaluation is qualitative and is developed from the model provided in CIRIA C552 Contaminated Land Risk Assessment – a guide to good practice (DETR 2001). It involves classifying risk in terms of (a) magnitude of the potential consequence (severity) of occurrence and (b) the probability (likelihood) of occurrence. The risk rating derived is used to determine what action, if any, is needed to further investigate that risk and/or remediate to reduce risk to an acceptable level.

Task 1: Classification of Consequence

Classification	Definition	Examples
Severe	• Short-term (acute) risk to human health likely to result in "significant harm" (as defined in EPA90 Part 2a). • Short-term (acute) risk of pollution of sensitive water resource. • Short-term (acute) risk to an ecosystem, or organism forming part of an ecosystem.	• Unusually high concentration of toxic substance on the surface of a garden or recreation area. • Major spillage of contamination from the site into controlled waters. EA Category 1 pollution incident. Closure of an abstraction point. • Explosion, causing building collapse (and death if occupied).
Medium	• Chronic damage to human health likely to result in "significant harm". • Pollution of sensitive water resource. • Significant change in a particular ecosystem, or organism forming part of such ecosystem.	• Concentration of contaminant from site exceeds generic or site-specific assessment criteria for human health or water supply pipes. Presence of asbestos. • Leaching of contaminants from a site to a principal or secondary (A) aquifer. Concentration exceeds DWS or EQS in Inner. Source Protection Zone (SPZ1). EA Category 2 pollution incident. • Death of a species or loss of habitat within an area of national importance.
Mild	• Exposure is unlikely to result in "significant harm" to human health. • Pollution of non-sensitive water resource. • Damage to sensitive buildings, structures and services or the environment.	• Concentration of contaminant from site below generic or site-specific assessment criteria. • Pollution of secondary (B or undifferentiated) aquifer. EA Category 3 pollution incident. • Damage to a building rendering it unsafe to occupy. • Death of a species or loss of habitat within an area of local importance. • Loss of plants in garden or landscape areas (BS3882 limits exceeded).
Minor	• Harm (but not significant harm) resulting in a financial loss or expenditure to resolve. • Non-permanent human health effects. • Easily repairable damage to buildings, structures and services.	• Pollution of unproductive strata.

Task 2: Classification of Probability

Classification	Definition
High Likelihood	There is a pollution linkage and an event appears very likely in the short term and almost inevitable over the long term or there is actual evidence at the receptor of harm or pollution.
Likely	There is a pollution linkage, and all the elements are present and in the right place, which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short term and likely over the long term.
Low Likelihood	There is a pollution linkage, and circumstances are possible under which an event could occur. However, it is by no means certain that even over a longer period such event would take place and is less likely in the shorter term.
Unlikely	There is a pollution linkage, but circumstances are such that it is improbable that an event would occur in the very long term.

Task 3: Risk Estimation

		Potential Consequence			
		Severe	Medium	Mild	Minor
Probability	High Likelihood	**Very high risk**	High risk	Moderate risk	Low risk
	Likely	High risk	Moderate risk	Low risk	Low risk
	Low Likelihood	Moderate risk	Low risk	Low risk	Very low risk
	Unlikely	Low risk	Low risk	Very low risk	Very low risk
	No linkage	No risk			

Task 4: Description of the Estimated Risks and Likely Action Required

Risk	**Action**
Very High Risk	There is a high probability that severe harm could arise or there is evidence that severe harm is currently happening. This risk, if realised, is likely to result in substantial liability. **Urgent investigation and remediation are required for the site in its existing state and for development.**
High Risk	Harm is likely to arise. Realisation of the risk is likely to present a significant liability. **Urgent investigation is required and remedial works may be necessary in the short term and are likely over the long term. Remediation will probably be required for development.**
Moderate Risk	There is a possibility that harm is likely to arise. However, it is either relatively unlikely that any such harm would be severe or if any harm were to occur it is more likely that the harm would be relatively mild. **Investigation is typically required to clarify the risk and to determine the potential liability. Some remedial works may be required in the longer-term.**
Low Risk	It is possible that harm could arise, but it is likely that this harm, if realised, would at worst normally be mild. **Investigation is not normally required but could be useful to confirm a preliminary assessment. Remedial works are unlikely to be required or will be limited.**
Very Low Risk	There is a low possibility that harm could arise. In the event of such harm being realised it is not likely to be severe. **No further action recommended.**

Annex D – Preliminary Contaminant Potential Pollutant Linkage Risk Table

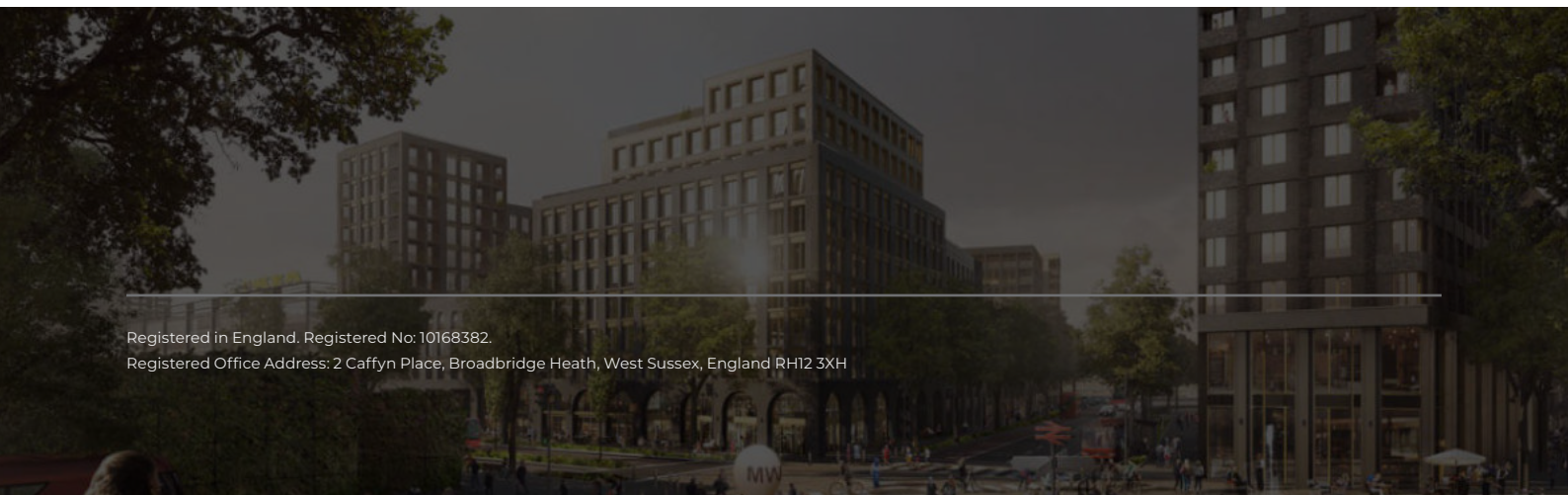
Potent a Po utant L nkages:
Qua tat ve R sk Assessment Tab e

Item No.	Area/ Building	Potential Pollutant (Source)	Potential Receptor	Potential Pathway to Receptor	Associated Hazard	Potential Consequence of S-R Link	Likelihood of S-R Linkage	Significance: Risk Classification	Comment
1	historical and current site uses most notably possible agricultural uses (including possible sludge spreading and fertiliser storage and spreading) ground workings unspecified tanks and gas valve compound Made ground was not indicated to be present in the records reviewed however there is potential for it to be encountered in areas close to farm buildings localised infrastructure development (e g bases of overhead power lines) and backfilled historic surface excavations The potential for made ground of some types to generate hazardous ground gases	agrochemicals fuel oils heavy metals asbestos containing materials pesticides polyaromatic hydrocarbons (PAH) and hazardous ground gases (carbon dioxide and methane)	Human-health (redevelopment workers/services)	Dermal Contact ngestion nhalation	Toxic	Medium	Unlikely	Low	There is a low likellihood for significant contamination at surface associated with agricultural sources to be present f contamination associated with Made Ground is present beneath the site it is likely to be very localised - significant levels of contamination are therefore not anticipated Whilst the risk to construction workers has been assessed as low this is based on the assumption that a construction management and health and safety plan will be produced prior to commmencement of works The above-mentioned documentation will cover the requirement for construction workers to use job specifc Personal Protective Equipment (PPE) during the construction works Construction activities may create dust on and off site which if contaminated could adversely affect operatives end users and neighbours Dust mitigation measures during construction activties should be implemented A 'Discovery Strategy' protocol shall be included in construction phase environmental management plan to ensure that contamination identified during construction is assessed by a specialist in land contamination This will include but not be limited to stopping works in the area and ensuring the identified contamination does not pose a risk until an environmental specialist undertakes an assessment and a method is agreed to deal with the identified contamination
2			Human-health (future users - maintenance workers)	Dermal Contact ngestion nhalation	Toxic	Medium	Unlikely	Low	There is a low likellihood for significant contamination at surface associated with agricultural sources to be present f contamination associated with Made Ground is present beneath the site it is likely to be very localised - significant levels of contamination are therefore not anticipated The potential for direct contact with soil is considered to be low for the nature of the proposed development Significant contamination from these sources is considered unlikely
3			Groundwater (Unproductive Aquifer - Bedrock and superficial deposits)	Leaching Migration	Groundwater pollution	Medium	Unlikely	Low	Unproductive aquifers within bedrock and superficial deposits underlies the site Although contamination from agricultural sources could exist in groundwater it is considered unlikely that this would be present in sufficient quantities to signifcantly affect the groundwater receptors
4			Groundwater (Unproductive Aquifer - Superficial and Bedrock)	Leaching Migration	Water pollution	Mild	Unlikely	Low	Although contamination from agricultural sources could exist in groundwater it is considered unlikely that this would be present in sufficient quantities to signifcantly affect the groundwater receptors
5			Surface Waters (Drains)	Leaching Migration		Mild	Unlikely	Low	Although contamination from agricultural sources could exist in surface waters it is considered unlikely that this would be present in sufficient quantities to signifcantly affect the surface water receptors
6			Human-health (redevelopment workers/services)	Migration Accumulation		Severe	Unlikely	Low	The risk of a severe impact from ground gas accumulation is considered low This assessment is based on the nature of the development and the low probability of the made ground containing significant gas-generating materials
7			Human-health (future users - maintenance workers)			Severe	Unlikely	Low	
8			Buildings and structures associated with Area B of the development			Mild	Unlikely	Low	
9	historical and current off-site uses most notably agricultural land and farm buildings unspecified tanks and unspecified pits and ground workings around the Site	Possible contaminants to include agrochemicals pesticides heavy metals fuel oils and hazardous ground gases (carbon dioxide and methane)	Human-health (development workers/services)	Migration Accumulation	Toxic	Severe	Unlikely	Low	The risk of a severe impact from ground gas accumulation is considered low This assessment is based on the nature of the development and the low probability of the made ground containing significant gas-generating materials There is a low likelihood of risk to on site soils from historic or present day off site sources
10		Hazardous ground gases	Human-health (future users - maintenance workers)	Migration Accumulation	Toxic	Severe	Unlikely	Low	

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Eastern Cable Route Technical Note

To:	**Logika Consultants Ltd** St. Augustine´s Court, 1 St. Augustine´s Place, Bristol, BS1 4UD	**Date:**	21 October 2026
		Turnkey reference:	0212-TN005i3
		Issued: **Reviewed:**	[redacted] [redacted]

Title: Longmarsh Green Energy Eastern Cable Route – Land Quality

1 Introduction

This Technical Note has been prepared to consider the potential land contamination risks within the Eastern Cable Route for the proposed Longmarsh Green Energy development (the Proposed Development). A description of the Proposed Development is provided in **Chapter 4** of the Longmarsh Green Energy Scoping Report.

The primary objective of this Technical Note is to provide a high-level evaluation of the key land quality and potential associated considerations within the Eastern Cable Route and any potential effects. A full Phase 1 Desk Study, also referred to as a Preliminary Risk Assessment (PRA) for the Eastern Cable Route has not been carried out due to the relatively lower level of ground-related and construction-related risks associated with the Eastern Cable Route of the Proposed Development, compared with the Western and Eastern Sites. Full Phase 1 Desk Studies have been prepared by Turnkey Regeneration Ltd for the Western and Eastern Sites. These reports should be read in conjunction with this Technical Note:

- Phase 1 Desk Study which was undertaken for the Longmarsh Green Western Site (document reference: 0212-R003i4 dated October 2026).
- Phase 1 Desk Study which was undertaken for the Longmarsh Green Eastern Site (document reference: 0212-R004i4 dated October 2026).

A Technical Note has also been undertaken for the Western Cable Route, which should be read in conjunction with this Technical Note (document reference: 0212-R006i3 dated October 2026).

2 Proposed Development

The Eastern Cable Route links the Western and the Eastern Sites and includes overhead lines and underground cabling.

The Proposed Development will export and import electricity via a 400kV connection at the Walpole National Grid Electricity Transmission (NGET) Grid Supply Point (GSP). Cabling between the Eastern and Western Sites (the Eastern Cable Route) will be a combination of overhead and underground. Between the Eastern Site and to the west of the A10 road / A134 road junction. Cabling is proposed to be underground for a length of approximately 7.5km. After the A10 road / A134 road junction, cabling will transfer to the overhead line with a length of approximately 7km. Therefore, a total of 14.5km.

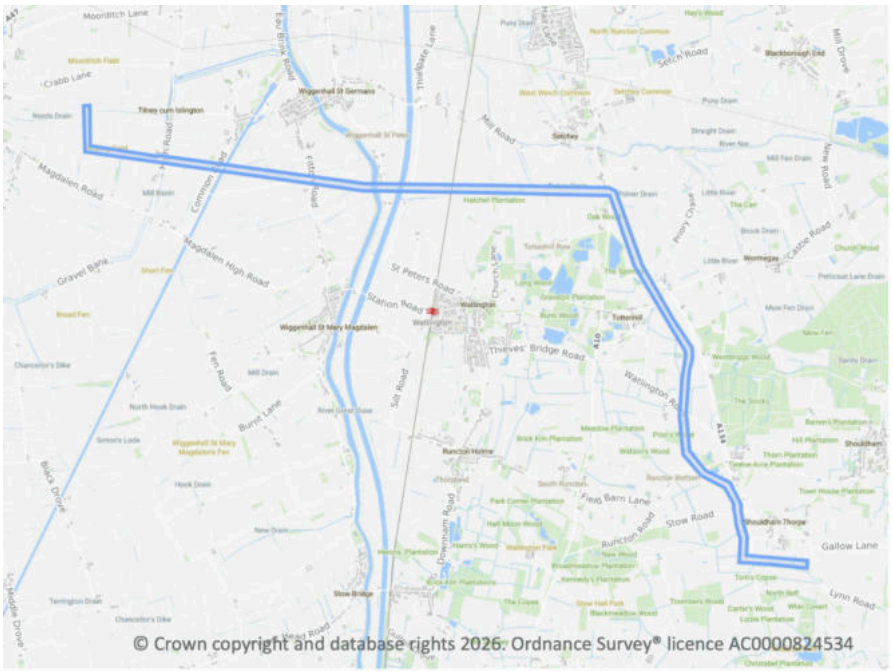
3 Site Setting

The Eastern Cable Route connects the Western and Eastern Sites. There are also three cable route areas that connect the field parcels of the Eastern Site. These interconnecting cable routes are considered within the Eastern Site Desk Study, as they form part of the Eastern Site. This Eastern Cable Route is approximately 75m to 100m wide and encompasses the approximate possible future footprint of the Eastern Cable Route. The Eastern Cable Route will be approximately 7.5km of buried route and

approximately 7km of overhead line. A Plan showing the location of the Eastern Cable Route is provided below.

It extends near to Reeds Drain at the north and heads across Common Road and Fitton Road to Polver Drain, before heading south towards Watlington Road and Stow Road. From here, it heads east towards Gallow Lane. It is noted that the Eastern Cable Route is extended slightly further into the Western Site – this does not materially affect the conclusions.

Eastern Cable Route



Reproduced from the GroundSure® Reports for Eastern Cable Route Part 1 August 2026 (report references: GS-15C-3SW-HOK-VPQ, GS-RLF-OC5-Q14-ONH, GS-ZJ3-JOB-IUE-PVG and GS-DRW-8AS-XT6-1TL)

4 Baseline Data Collection

The Study Area for baseline data collection has been defined as extending up to 250m, typically 125m, from the Eastern Cable Route for land and controlled waters receptors. This Study Area has been adopted for the purposes of this Technical Note and is considered sufficiently conservative to capture off-site receptors with the potential to affect, or be affected by, the Proposed Development.

Given the low sensitivity of the proposed Eastern Cable Route in relation to land quality, and its use solely for infrastructure purposes, significant effects on land quality receptors are considered unlikely.

To facilitate the production of this Technical Note, the following information sources have been utilised:

- Historical Ordnance Survey Mapping (obtained via the GroundSure® Reports obtained below).
- GroundSure® Reports comprising Enviro Insight and Geo Insight Reports (report references: GS-15C-3SW-HOK-VPQ, GS-RLF-OC5-Q14-ONH, GS-ZJ3-JOB-IUE-PVG and GS-DRW-8AS-XT6-1TL). The key contents of which are summarised below.
- British Geological Survey (BGS) Mapping and Borehole records.
- Open-Source aerial and street view images including Google Earth®.
- Defra's Open-Source MAGIC website.

5 Eastern Cable Route – Baseline Conditions

The National Grid Reference for the centre of the Eastern Cable Route is 562221 N, 311544 E. It is predominantly agricultural in nature, largely comprising arable fields and lowland areas. Some residential areas, farm buildings, a public house and pockets of woodland, including the Hatchet Plantation, Oak Wood and Prior´s Wood are present. No significant commercial or industrial development is present on-site. The Fen railway line crosses the Eastern Cable Route, heading south towards the nearby Watlington railway station. The western part of the Eastern Cable Route is covered by an extensive network of land drains and the two channels of the River Great Ouse (which bisect the Eastern Cable Route from north to south).

Site History

A former brick yard (dating to the 1880s), a former brick works (dating to 1904) and two unspecified pits (dating to the 1880s and the 1950, one of which appears to be associated with the former brick yard, and brick works) are recorded to have been present on-site. Large areas of the Eastern Cable Route have comprised open, undeveloped land including fields, woodland and orchards and have remained undeveloped since historical mapping records began.

Wider historical unspecified pits, a brickyard, kilns, ground workings, sand and gravels pits and nurseries are also recorded within a 125m radius of the Eastern Cable Route.

Industrial Land Use

Two significant historical pits are recorded by GroundSure® on-site, relating to Prior´s Lands Farm Pit and Tottenhill Pit for the extraction of clay, shale and sand. Operations at both pits have ceased. Various ponds associated with former workings are also recorded to be present on-site. Records of non-coal mining relating to chalk extraction are also recorded on-site. Wider former pits are present immediately around and adjacent to the Eastern Cable Route.

There are no records of historical petrol stations, historical garages, historical military land or historical energy features recorded on site or within a 250m radius of the site. There is one record of a historical tank recorded within a 250m radius of the site, recorded approximately 38m north of the site (dating to 1992).

There are fifty-two waste exemptions recorded by GroundSure® to be located on-site. However, these are associated with the adjacent farm at 35 High Road, Tilney Cum, Islington. These exemptions relate to internal agricultural operations and include waste storage, treatment, use and disposal (from incineration and burning, the dredging on inland waters and from portable sanitary convenience only).

No active, recent or historical landfill sites are recorded by GroundSure® on-site or within 250m of the Eastern Cable Route. There are no historical or licensed waste sites on-site or within a 250m radius of the Eastern Cable Route.

Two existing railway lines are recorded to cross the Eastern Cable route, relating to branches of the Fen Line. There is no further recent industrial land uses recorded on-site or within a 125m radius of the Eastern Cable Route.

There are no sites determined as Contaminated Land under Part 2a of the Environmental Protection Act (EPA) 1990.

Geology and Radon

There are no mapped areas of Made or Worked Ground shown on British Geological Survey (BGS) mapping. Limited Made Ground is potentially present in localised areas associated with mineral extraction sites, railway lines, farm, public house and residential buildings, roadways, or tracks, but there is no indication that extensive areas of artificial ground exist.

The western half of the Eastern Cable Route is recorded to be directly underlain by Tidal Flat Deposits, with the eastern half of the Eastern Cable Route underlain by the Tottenhill Sand and Gravel Member, Lowestoft Formation, Tidal Flat Deposits and Head Deposits.

The bedrock beneath the Eastern Cable Route comprises the Kimmeridge Clay Formation (predominantly Mudstone) within the western half, with various bedrock units underlying the eastern half

including the Kimmeridge Clay Formation (predominantly Mudstone), West Melbury Marly Chalk Formation (Chalk), Leziate Member (Sand), the Roxham Member and Runcton Member (Undifferentiated Sands), the Carstone Formation (Sandstone), the Mintlyn Member (Sand) and the Gault Formation (Mudstone).

No natural cavities are recorded on-site. Significant soluble rocks are likely to be present on-site though problems are unlikely except with considerable surface or subsurface water flow.

No significant risks from radon are recorded on-site by GroundSure®.

The south-eastern corner of the Eastern Cable Route is recorded as having a moderate risk of shrink swell clays, indicating the ground conditions are of predominantly high plasticity. The western half has a moderate risk of running sands and compressible deposits, indicating running sand conditions, compressibility and uneven settlement hazards are probably present. No further ground hazards are recorded.

Hydrogeology

The western half of the Eastern Cable Route is underlain by Unproductive Strata, relating to the Tidal Flat Deposits and Kimmeridge Clay Formation. The northern part of the eastern half of the Eastern Cable Route is underlain by a Secondary A Aquifer comprising the Tottenhill Sand and Gravel Member and Head Deposits, with the southern part of the eastern half underlain by a Secondary Undifferentiated Aquifer relating to the Lowestoft Formation. The superficial deposits are underlain by a Principal Aquifer and various Unproductive Strata units. The western half of the Eastern Cable Route is shown as having low groundwater vulnerability, while the eastern half is shown as having low to very high groundwater vulnerability.

There are no groundwater Source Protection Zones (SPZs) on-site and no groundwater abstractions recorded on-site or within 125m of the Eastern Cable Route.

Hydrology and Flood Risk

Various land drains are present on-site including Polver Drain, Reeds Drain, Smeeth Lode, Hobb´s Drain, Relief Channel, Mill Basin and Middle Level Main Drain, as well as a series of smaller unnamed land drains. The River Great Ouse also crosses the Eastern Cable Route, forming two channels.

The Eastern Cable Route lies within five Water Framework Directive (WFD) surface waterbody catchments relating to Stringside Stream, Middle Level, Relief Channel, Polver Drain and the Great River Ouse (a transitional water within a coastal catchment). The Eastern Cable Route also lies within the WFD groundwater body catchment relating to North-west Norfolk Sandringham Sands.

There are ten surface water abstractions recorded on-site, seven of which are recorded by GroundSure® as active and relate to direct spray irrigation and surface water source of supply associated with farming operations on-site.

There are no licensed discharges to controlled waters or pollution incidents recorded on-site or within a 125m radius of the Eastern Cable Routes.

The Eastern Cable Route is recorded as being at negligible to high risk of river and coastal flooding, with parts of the Eastern Cable Route lying within Flood Zone 2 and Flood Zone 3. Flood defences are recorded on-site. A maximum high risk of surface water flooding and groundwater flooding is recorded on-site by GroundSure®.

Sensitive Land Uses

There is one Site of Specific Scientific Interest (SSSI) recorded at Setchey which is close to the boundary of the Eastern Cable Route. No further SSSIs are recorded within a 250m radius of the site boundary.

No further sensitive land uses are recorded on site.

6 UXO Risk

The Eastern Cable Route is identified as being at low risk from Unexploded Ordnance (UXO).

7 Eastern Cable Route Risk Profile

The risk profile has been deduced from the baseline conditions evaluation carried out for the Eastern Cable Route. It should be noted that this takes into consideration the nature of the Eastern Cable Route which will consist of both overhead powerlines and underground cabling components. This assumes minimal excavation works, in terms of both vertical and lateral extent on site to facilitate the construction of both overhead and below-ground lines.

The Eastern Cable Route has some historical industrial land use including former brick yards and works, pits and ground workings. Localised Made Ground and infilling is possible. The groundwater setting is highly variable with the western half associated with Unproductive Strata and low groundwater vulnerability, whereas generally the eastern half includes Secondary Aquifers and areas of low to very high groundwater vulnerability, with a Principal Aquifer beneath the superficial deposits. The extensive network of drains and the River Great Ouse also provide important potential pathways / receptors for mobilisation of contaminants which would need to be considered. An overall **low to moderate** land quality risk has been concluded based on the potential for localised contamination to be present on-site and risks to underlying aquifers and land drains on site.

Any risks associated with excavation and piling operations, including potential effects on land and groundwater quality, will be managed through the implementation of an outline Construction Environmental Management Plan (oCEMP) and associated piling and foundation works risk assessments. These measures will identify potential environmental risks arising from ground disturbance, excavation and piling activities and establish appropriate mitigation and control measures to prevent or minimise impacts, including the mobilisation of contaminants, soil disturbance and potential pathways to groundwater. All works will be undertaken in accordance with the relevant environmental controls and good practice and be secured by DCO Requirement.

8 Eastern Cable Route Conclusions

Based on the available baseline information presented within this Technical Note, it is considered unlikely that contaminated materials will be encountered during the groundworks undertaken within The Eastern Cable Route. It can therefore be concluded that significant land quality risks are not anticipated and that the Eastern Cable Route is considered to pose an overall low environmental risk. This will be confirmed as part of future ground investigation to support the design of the Proposed Development.

As part of the ground investigation, it is recommended that assessment of topsoil quality on-site is carried out and to verify the presence or absence of the identified areas of potential infill indicated by historical mapping, especially where these coincide with any proposed structures. It will be important to confirm specific consideration regarding historical agricultural practices. It may be prudent to verify, through the landowners/farmers and Local Planning Authority (LPA) records, whether treated sewage sludge and pesticides were historically spread on the land within the Eastern Cable Route. The application of these compounds creates a possible pathway for introducing Per- and Poly-Fluoroalkyl Substances (PFAS), and pesticide compounds into soils. The confirmation of these activities would inform the decision for targeted topsoil sampling topsoil if required. This targeted verification would provide greater certainty in soil quality characterisation whilst ensuring the robust management of materials for possible re-use.

A detailed intrusive ground investigation will be carried out to support the Proposed Development. This is likely to be secured as a Requirement of the Development Consent Order (DCO) to help inform the detailed geotechnical design of proposed buildings, structures, foundations, and associated infrastructure. The ground investigation work will inform the design and additional mitigation measures relating to land and groundwater quality, if deemed to be required.

In addition to the above, the implementation of a Discovery Strategy will be considered as part of the oCEMP and should include a procedure for managing unexpected contamination (i.e. a watching brief). If encountered, further mitigation measures such as localised remediation or removal of contamination may be required.

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Phase 1 Desk Study Report

Longmarsh Green Energy (Eastern Site)
King's Lynn, Norfolk
October 2026

Job Number/Document Number: 0212 - R004i4

Report prepared for:
Logika Group
St Augustine's Court
1 St Augustine's Place
Bristol
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Version	Description	Author	Reviewed	Date
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3	Final (Update of additional Client Comments)	[redacted]	[redacted]	02/10/26
4	Final (Update to reflect minor corrections)	[redacted]	[redacted]	21/10/2026

Issued:

.....
[redacted]

Approved:

.....
[redacted]

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Executive Summary

Site Address and Setting	The Eastern Site comprises four land parcels (Parcels 1 to 4) of approximately 964 hectares in total with three interconnecting cable routes (Parts 2 to 4) and broadly lies to the south and west of RAF Marham, east of Stradsett, north of Stoke Ferry, and immediately in the vicinity of Fincham, in the county of Norfolk, England. The Eastern Site surrounds predominantly consist of agricultural fields, used for arable farming. RAF Marham is present at the north-eastern boundary of Parcel 3, Part 3 and north of Parcel 2.
Proposed Development	The Proposed Development comprises the construction and installation of solar photovoltaic panels, a datacentre campus, Battery Energy Storage Systems (BESS) and associated infrastructure which will allow for the generation of electricity. A full description of the Proposed Development is provided in Chapter 4 of the Scoping Report.
Site Setting	Based on information published by the British Geological Survey, the Eastern Site is underlain by various superficial geology, depending on parcel location, including Lowestoft Formation, Peat and Alluvium. The bedrock geology is indicated to be Chalk, identified in three formations; West Melbury Marly Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation (undifferentiated) and Melbourn Rock Member The superficial geology is designated as Secondary A (Alluvium), Secondary Undifferentiated (Lowestoft Formation) and Unproductive aquifer (Peat). The bedrock geology is designated as a Principal Aquifer with high intergranular or fracture permeability, providing a high level of water storage and may support water supply/river base flow at a strategic level. There are two groundwater Source Protection Zones (SPZ) noted within the Eastern Site. SPZ1 is located on the eastern most boundary of Parcel 1, with SPZ3 located in the eastern half of Parcel 2. Parcel 3 and Parcel 4 have no SPZ. SPZs around the Eastern Site include SPZ1 and SPZ3.
Site History	The majority of the Eastern Site is undeveloped and consists predominantly of open fields used for agricultural purposes. Based on the historical maps, there has not been significant changes to field boundaries or usage since the 1990s. RAF Barton Bendish was present in the northern section of Parcel 1 and the eastern half of Part 4 from 1939 to 1942 but is not shown in historical mapping. RAF Marham was originally commissioned in 1916, before a brief period of closure until 1937, before re-opening, and continued operation until the present day. This is present around the northern boundary of Parcel 2, Parcel 3 and Part 3 of the Eastern Site. The immediate surrounding land consisted predominantly of open fields. Fincham village and farmhouses associated with the Eastern Site were present at the central section. Other farmhouses and the village of Stradsett were present beyond the western boundary. Barton Bendish village lies centrally within the four land parcels. A disused chalk pit (dating to the 1980s) is recorded on-site (within Part 4 of the connecting routes), with additional chalk pits and workings present in the nearby area (dating between 1884 to 1983). There are also records relating to chalk extraction within Part 2 and 3 of the Eastern Site.

Environmental Appraisal	Based on the preliminary Conceptual Site Model and Qualitative Risk Assessment, the potential pollutant linkages for Eastern Site have predominantly been given a **low-risk** classification for risks to human and controlled waters receptors. The exception is Part 4 of the Eastern Site which has been given an overall **low to moderate** risk classification due to the potential for contamination to be present associated with either the potentially infilled chalk pit and/or RAF Barton Bendish (which occupied the eastern half of this section of the Eastern Site) and the potential for any such contamination to impact the underlying Chalk aquifer and surface waters (land drain).
Recommendations	To manage the low to moderate risk of contamination, a robust strategy, which includes a Discovery Strategy and an Unexpected Contamination protocol, should be implemented as needed. Despite the low-risk classification across the majority of the Eastern Site, a limited site investigation is recommended to assess the quality of topsoil present at the Eastern Site and to investigate the chalk pit and area occupied by RAF Barton Bendish in Part 4 of the Eastern Site. It is important to confirm specific consideration regarding historical agricultural practices, particularly the application of treated sewage and pesticides. The confirmation of these activities would inform the decision for targeted sampling and analysis of the topsoil for a suite of Per and Polyfluoroalkyl Substances (PFAS) and other pesticide-related compounds. This targeted verification would provide greater certainty in soil quality characterisation whilst ensuring the robust management of materials for possible reuse, mindful of the future end use (solar farm, BESS Units and Substation), i.e. typically unmanned, meaning even should these practices be confirmed, the low-risk classification is likely to appropriate regarding human health. A limited site investigation may also be required on the area of the historical RAF Barton Bendish, with UXO oversight, in the north of Parcel 1 and Part 4 depending on whether there will be significant excavation works in this area. Most of the Eastern Site is identified as low risk from UXO. However, due to the close proximity of RAF Marham, parts of the Eastern Site within 0.3km of RAF Marham are flagged as a moderate risk requiring a detailed UXO risk assessment. Locations within 0.3km are in the north of Parcel 2 and the north-east of Parcel 3. This may be required depending on if there will be significant excavation works in the area. The area in the north of Parcel 1 and Part 4, the old site of RAF Barton Bendish is recommended for further research by the UXO Pre Desk Study Assessment (PDSA), Annex E, due to the previous land use and potential for UXO presence.

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1. Introduction

1.1 Background

Longmarsh Green Energy (the 'Proposed Development'), will comprise the construction and installation of solar photovoltaic panels and associated infrastructure which would allow for the generation of electricity across approximately 1,980 hectares (ha), split over two areas (Western Site and Eastern Site), within the Borough of King's Lynn and West Norfolk. This report relates to the Eastern site only (the 'Eastern Site'), a separate report is available for the Western site (Ref: Phase 1 Desk Study Report, Longmarsh Green (Western Site), King's Lynn, Norfolk 0212-R003i3, dated October 2026). An assessment of land quality has also been completed for the Eastern Cable Route and Western Cable Route. These assessments are presented in two separate Technical Notes (Ref: 0212-TN005i2 and 0212-TN006i2 respectively both dated October 2026.

As part of the planning process, a Phase 1 Land Contamination Desk Study (this report) is required to assess the land quality at the Eastern Site of the Proposed Development.

A location plan is provided as Figure 2.1 below and the Eastern Site boundary is presented in **Annex A**.

1.2 Purpose of the Report

The purpose of this report is to establish the environmental status of the Eastern Site and to provide a preliminary assessment of any potential land contamination issues. The assessment will aim to identify potentially significant environmental issues associated with the Eastern Site, which could result in either statutory liabilities or potential risks associated with the Proposed Development.

This will be achieved through the following scope of works:

- Establish the environmental setting and context of the Eastern Site.
- Determine the historical land use of the Eastern Site.
- Review existing reports, where available.
- Develop a preliminary Conceptual Site Model (CSM).
- Conduct a preliminary risk assessment of potential contamination at the Eastern Site.
- Make recommendations for further works (if necessary).

Depending on the findings of this desk study, ground investigation *could be* required to further define/confirm land quality and assess the need for remediation. Note that the preliminary risk assessment does not assess current use but only the planned future use, which is subject to the future Development Consent Order (DCO) application.

Geotechnical assessment is outside the scope of this desk study; however, the factual data/information will be useful for any geotechnical or structural requirements.

1.3 Legislative Context

The information obtained from desk-based information has been used to develop a preliminary CSM and risk assessment which examines the potential for contaminant-pathway-receptor linkages for human and environmental receptors.

Overall, this "precautionary" approach is designed to give confidence to future site users, the developer, the local authority and Planning Inspectorate that the development site, in the words of the National Planning Policy Framework 2026, is:

"Sites proposed for development should be suitable for their proposed use taking into account:

a) Ground conditions, including any risks arising from land instability or contamination (whether due to natural hazards or current and former activities such as mining or fuel storage); and

b) The extent to which any such risks can be mitigated, and the potential impacts on the natural environment arising from remediation."

It is also our objective to show that the development, at a minimum, will leave the Eastern Site in a condition where it is not capable of being determined as' Contaminated Land' under Part 2A of the Environmental Protection Act 1990 and to provide sufficient information to satisfy potential planning conditions that would require an assessment of risk in line with 'Land Contamination: Risk Management' (issued October 2020)1.

This report has been prepared by and reviewed by Competent Persons.

1.4 Information Sources

The following information sources have been utilised in this report:

- Site photographs (presented as **Annex B**).
- Historical Ordnance Survey Mapping obtained via the Groundsure® reporting obtained below.
- Groundsure® Reports comprising Enviro Insight and Geo Insight referenced GS-FYR-ZLQ-8MU-H9K, GS-45I-FFM-BD4-QG7, GS-XZF-8QE-G24-S4D and GS-IYN-BN9-G7L-KXG (key contents are summarised below).
- British Geological Survey (BGS) Borehole Records (www.bgs.co.uk).
- BGS mapping sheet 159 and 160 'Alford' (1:50,000 scale) 'Solid and Drift' dated 1984.
- BGS Hydrogeological Map of Northern East Anglia, Sheet 1 Regional Characteristics and Explanatory Notes, Copyright 1976.
- Open-Source aerial and street view images including Google Earth®.
- Defra's Open-Source MAGIC website (https://magic.defra.gov.uk/magicmap.aspx).
- Unexploded ordnance survey information (https://zeticauxo.com/guidance/risk-maps/).
- Environment Agency Historic Landfill Data (https://www.data.gov.uk/dataset/17edf94f-6de3-4034-b66b-004ebd0dd010/historic-landfill-sites)

It should be noted that the boundaries shown on the historical OS mapping and the Groundsure® Report were based on early design stage boundary plans for the Proposed Development and differ slightly to that shown for the Eastern Site in **Annex A**. However, this is not considered to change the findings or data presented in this report due to coverage of the additional areas within the search buffers applied by the Groundsure® Report. Therefore, appropriate baseline data to support this report and conclusion reached is included.

[1] This updated guidance is based on 'The Model Procedures For The Management Of Land – Contaminated Land Report' (CLR11); the scope, framework and purpose remain the same.

2. Site Setting

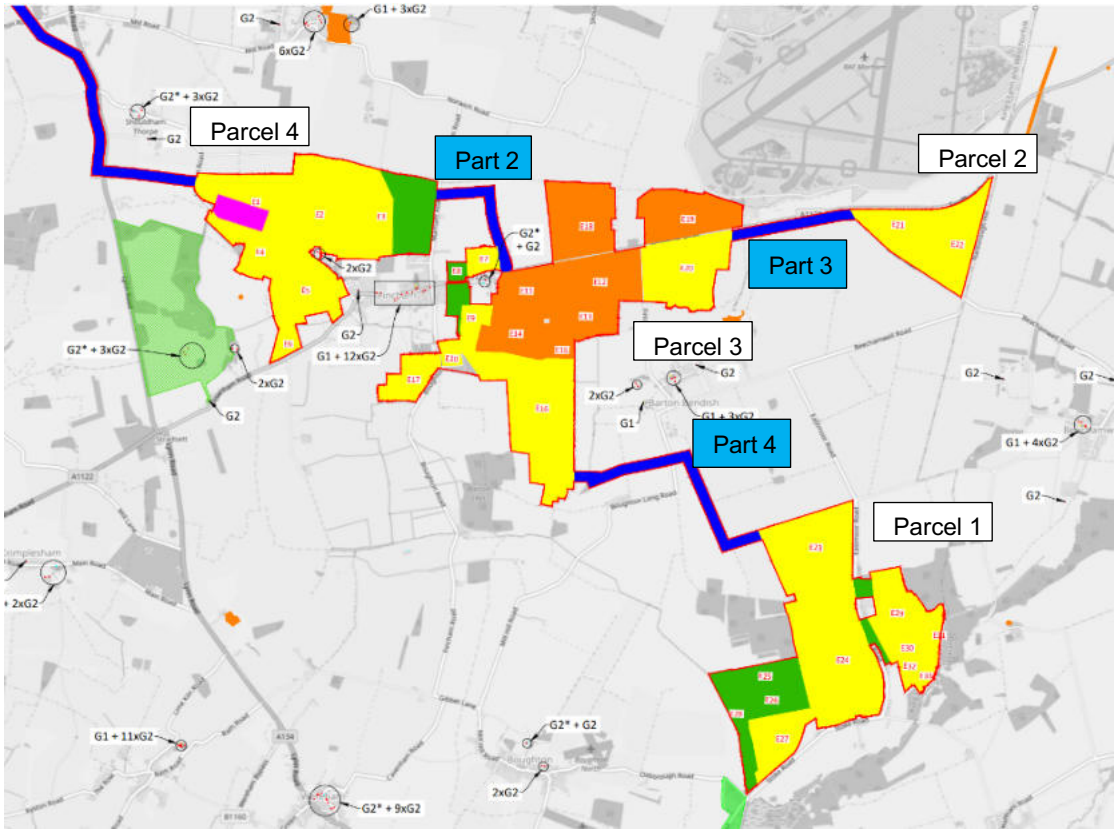
2.1 Site Status

The Eastern Site comprises four land parcels (Parcels 1 to 4) of approximately 964 hectares and three interconnecting cable routes (Parts 2 to 4[1]). The Eastern Site broadly lies to the south and west of RAF Marham, east of Stradsett and north of Stoke Ferry, in the county of Norfolk, England. It is situated approximately 7 miles west of Swaffham. The location of the Eastern Site is shown in **Figure 2.1**. The currently proposed location of the Battery Energy Storage System (BESS) Units and Substation for the Eastern Site is in the north-west of Parcel 4, shown in pink on Figure 2.1.

The Eastern Site surrounds predominantly consist of agricultural fields, used for arable farming. RAF Marham is present at the north-eastern boundary of Parcel 3, north of Parcel 2 and Part 3.

Details of the historical use and environmental setting of the Eastern Site land parcels are contained in Sections 2.2 to 2.7 of this Report. An overview of the historical use and environmental setting of the three interconnecting cable routes is provided in Section 2.8.

Figure 2.1 Eastern Site Location Plan



Reproduced from drawing 192-01-01-H-2-Issue 6 24/9/26 Longmarsh Green Energy – Indicative Plan – Eastern Area. Not to Scale

[1] The Eastern Cable Route links the Western and Eastern Sites and for the purposes of the Groundsure® Reports was originally referenced as Part 1 of the cable route. The assessment of the Eastern Cable Route (Part 1) is presented in a separate Technical Note. Parts 2 to 4 referenced here and in the Groundsure® Reports are cable routes connecting the land parcels of the Eastern Site and form part of this Eastern Site Phase 1 Desk Study.

2.2 Site Description

2.2.1 The Site

The Eastern Site lies at a ground elevation of approximately 5m to 25m above Ordnance Datum (AOD), appearing locally undulating and sloping down from north to south. Approximate levels for each of the parcels is provided below:

- Parcel 1: 5m to 15m AOD
- Parcel 2: 20m to 25m AOD
- Parcel 3: 10m to 25m AOD
- Parcel 4: 15m to 25m AOD

2.2.2 The Surrounding Area

In general, the Eastern Site is surrounded by roads, open fields, villages and associated farmhouses. RAF Marham is present at the north-eastern boundary of Parcel 3, north of Parcel 2 and Part 3.

North: Open fields and RAF Marham

South: Open fields

East: Open Fields

West: Open Fields and Stradsett

Depending on which Parcel is being referred to, can slightly change the surrounding land use, therefore the site history in Table 2.1 is divided into parcels, which all form the Eastern Site of the Proposed Development.

2.3 Site History

Historical Ordnance Survey (OS) mapping for the Eastern Site area has been reviewed. These maps and plans date from 1883 OS County Series to 2025 OS Plans. Open-source aerial images were used to identify details from the past 20 years. The key points of the historical development of the Eastern Site and surrounding area are summarised below in Table 2.1 and this is based on the historic plans received as part of the Groundsure® Report.

Table 2.1 Key Points of Site Development History

Parcel 1	
Dates	**Description**
1884 - 1939	On-site: Open fields and isolated woodland, with a corn windmill noted in the south, not present after 1884. Unlabelled Pit backfilled from 1979. Workings, unknown origin, from 1885 but subsequently backfilled or removed. Off-site: Predominantly open fields with associated farmhouses. Roads and isolated houses present. Barton Bendish village present to the north. Barton Chalk Pit between Parcel 1 and Barton Bendish village. Boughten Fen labelled to south-west. St Mary's Chapel at the south-western boundary.
1939 - 1942	On Site: RAF Barton Bendish was present in the northern section only, not present on historical mapping or aerial imagery[2]. This was a satellite airfield to the nearby RAF Marham, considered too small to develop and abandoned in 1942. Off Site: No significant changes noted.
1942 - 1983	On Site: No significant changes noted, Parcel 1 is predominantly open fields. Off Site: Minor changes in residential developments and layout, but predominantly open fields and associated farmhouses. Barton Chalk Pit shown as disused on 1950 plan.
1983 - 2001	On-site: Drains are labelled on mapping. Off-site: No significant changes noted.
2001 - 2026	On-site: No significant changes noted. Off-site: Peat workings are marked at the south-western boundary until 2025.

[2] Dates obtained from Airfields of Britain Conservation Trust Barton Bendish - Airfields of Britain Conservation Trust

Parcel 2	
Dates	**Description**
1883 - 1916	<u>On Site:</u> South farm is located at the centre of the Parcel, with roads at the south and east boundary. <u>Off Site:</u> Open fields, roads and isolated woodland.
1916	<u>On Site:</u> No significant changes noted. <u>Off Site:</u> RAF Marham is present at the northern boundary of Parcel 2, the full extent is unclear, however, it is not present within the Parcel boundary.
1917 - 1936	<u>On Site:</u> No significant changes noted. <u>Off Site:</u> No significant changes noted.
1937 - 2026	<u>On Site:</u> No significant changes noted. <u>Off Site:</u> RAF Marham is recommissioned from 1937 until present day[3]. Much of the detail of RAF Marham is not present on historical mapping. A new road (A1122) is constructed at the northern boundary.

[3] Information from Royal Air Force Website RAF Marham | Royal Air Force

Parcel 3	
Dates	**Description**
1883 - 1884	<u>On Site:</u> Predominantly open fields with drains, small ponds, farmhouses, isolated woodland. Lode Dike is located to the west of Parcel 3. Osierholt Plantation is located around the centre of the Parcel. <u>Off Site:</u> Open fields, roads, isolated woodland, drains, Fincham village to the west and Barton Bendish in the east. A chalk and marl pit is in the north central section, north of the A1122 road and south of Broadland Farm. Barton chalk pit is located east of the Parcel. Old brick yard.
1884 - 1937	<u>On Site:</u> Ponds become backfilled over time. <u>Off Site:</u> No significant changes noted. RAF Marham is present from 1916, at the north-eastern boundary.
1937 - 1983	<u>On Site:</u> Allotments are noted north of the A1122, adjacent to Fincham Hall. <u>Off Site:</u> No significant changes noted, minor development around Fincham. Chalk and marl pit is replaced by woodland on historical mapping. RAF Marham is recommissioned from 1937 until present day, at the north-eastern boundary.
1983 – 2015	<u>On Site:</u> No significant changes noted. <u>Off Site:</u> No significant changes noted.
2015 - 2026	<u>On Site:</u> No significant changes noted. <u>Off Site:</u> Barton chalk pit no longer present.

Parcel 4	
1884	<u>On Site:</u> Predominantly open fields with drains, isolated woodland, roads and small ponds. Bull Lane runs through the centre of Parcel 4, trending east to west. <u>Off Site:</u> Predominantly open fields with isolated woodland, drains, roads, small and large ponds and farmhouses. Stradsett village is located to the south-west. Fincham village is in the east. A corn windmill is located to the west.
1884 – 1983	<u>On Site:</u> Small ponds are backfilled over time. <u>Off Site:</u> No significant changes noted, minor residential changes. Corn windmill no longer present.
1983 - 2026	<u>On Site:</u> Bull Lane changes name to Lynn Road. No other significant changes to field boundaries or land use. <u>Off Site:</u> No significant changes noted, minor residential changes.

2.3.1 Site History Summary

The majority of the Eastern Site is undeveloped comprising open fields used for agricultural purposes and isolated woodlands. Based on the historical maps, there has not been significant changes to field boundaries within Parcels 1 to 4 since the 1880s.

The most significant historical use recorded on the Eastern Site is RAF Barton Bendish in the northern section of Parcel 1 (and Part 4 – see Section 2.8). This was a satellite airfield of the nearby RAF Marham and was only in operation between 1939 and 1942. Publicly available records suggest there was no significant infrastructure associated with the airfield apart from pill boxes. There is a suggestion in the early part of the war that the Barton Bendish airfield was used as a decoy site by lighting flare paths to steer enemy bombers away from RAF Marham.

The immediate surrounding land comprises open fields, villages and woodland. The Eastern Site is near to villages in the north, west and south, with the closest being Fincham to the south of Parcel 1 and west of Parcel 4. RAF Marham is located immediately to the north of Parcel 2 and north-east of Parcel 3 and has been in operation since circa 1916. There are several chalk and marl pits located in the Eastern Site surrounds shown on historical maps, the closest to the Eastern Site being Barton Chalk Pit to the south of Barton Bendish and on the northern boundary of Parcel 3, south of Broadland Farms.

2.4 Environmental Setting

The ground conditions, controlled waters vulnerability and environmental setting for the Eastern Site are summarised within **Table 2.2.**

Table 2.2 Ground Conditions

Geology	Based on information published by the British Geological Survey, the Eastern Site is underlain by various superficial geology, depending on parcel location, including Lowestoft Formation, Peat and Alluvium. The Lowestoft Formation is comprised of chalky till with outwash sands and gravels, and clay and silt. The superficial geology is present in each parcel as below: • Parcel 1: Lowestoft Formation and Peat. Peat underlies the eastern and western sections of the Eastern Site, with a small section of Lowestoft Formation in the central section, trending north to south. Most of the central section has no superficial cover. • Parcel 2: No superficial deposits • Parcel 3: Lowestoft Formation and Alluvium. The western half of the Eastern Site is underlain by Lowestoft Formation, with a very small portion at the southern boundary underlain by Alluvium. • Parcel 4: Lowestoft Formation underlies the entire Eastern Site. The bedrock geology is indicated to be Chalk, identified in three formations; West Melbury Marly Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation (undifferentiated) and Melbourn Rock Member. The bedrock geology formations are present in each parcel as below: • Parcel 1: West Melbury Marly Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation (undifferentiated) and Melbourn Rock Member. Parcel 1 is generally split into two halves by the Melbourn Rock Member, with the West Melbury Formation in the western half and the Holywell Nodular and New Pit Formation in the eastern half. • Parcel 2: Holywell Nodular Chalk Formation and New Pit Chalk Formation underlies the entire Eastern Site. • Parcel 3: West Melbury Marly Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation (undifferentiated) and Melbourn Rock Member. Parcel 3 is generally split into two halves by the Melbourn Rock Member, with the West Melbury Formation in the south-western half and the Holywell Nodular and New Pit Formation in the north-east half. • Parcel 4: West Melbury Marly Chalk Formation underlies the entire Parcel According to the Groundsure® report, there are 2 no. historical boreholes recorded on the Eastern Site, located in Parcel 1 and Parcel 3, however, these boreholes are either confidential (relating to RAF Marham) or have been decommissioned with no data available. There are five boreholes

	present within 250m of the boundary of Parcel 1 and Parcel 3, again however, there is no data available for these due to confidentiality and poor historic record keeping. Further information is provided in the Groundsure® report.
Hydrogeology, Aquifer Classification and Groundwater Abstractions	According to the Groundsure® report, the superficial geology is designated as Secondary A (Alluvium), Secondary Undifferentiated (Lowestoft Formation) and Unproductive aquifer (Peat). Secondary A Aquifers are permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. Secondary Undifferentiated aquifers are where it is not possible to attribute either category A or B to a rock type, due to the variable characteristics of the rock type, it can be minor or non-aquifer. Unproductive aquifers are deposits with low permeability that have negligible significance for water supply or river base flow. The bedrock geology (Chalk) is designated as a Principal Aquifer with high intergranular or fracture permeability, providing a high level of water storage and may support water supply/river base flow at a strategic level. The Hydrogeological Plans on the BGS website indicate groundwater level in the Chalk to be at around +10m AOD to the east of the Eastern Site and +5m AOD to the south-west, indicating a groundwater flow direction to the south-west. The groundwater vulnerability is high across most of the Eastern Site, due to the underlying chalk bedrock and lack of superficial deposits in some areas (the northern section of Parcel 1). Groundwater vulnerability classifications are shown below. • High - Areas able to easily transmit pollution to groundwater. They are likely to be characterised by high leaching soils and the absence of low permeability superficial deposits. • Medium - Intermediate between high and low vulnerability. • Low - Areas that provide the greatest protection from pollution. They are likely to be characterised by low leaching soils and/or the presence of superficial deposits characterised by a low permeability. There are two groundwater Source Protection Zones (SPZ) noted within the Eastern Site. SPZ1 is located on the easternmost boundary of Parcel 1, encroaching within the Eastern Site boundary slightly. SPZ3 is in the eastern half of Parcel 2. Parcel 3 and Parcel 4 have no SPZ within the Site. SPZ's around the Eastern Site include SPZ1 and SPZ3. There are no potable water abstraction points within the Eastern Site Parcels, or within 250m of any of the Parcels. The closest, and only, potable water extraction points are approximately 500 to 600m from the eastern boundary of Parcel 1, operated by Anglian Water Services Ltd. The SPZ1 noted above will be associated with these abstraction points. There are no groundwater abstraction wells recorded on-site with three recorded within 500m of the eastern boundary of Parcel 1. There are no records of pollution incidents on-site and two incidents

	reported within 250m of the boundary of Parcel 1 and Parcel 4. These varied from minor to significant in the water category and land category. According to the Groundsure® report, there are two groundwater bodies present on-site. The Cam and Ely Ouse Chalk is present at each land parcel, with the North West Norfolk Chalk present in Parcel 3 only.
Surface Waters	According to the Groundsure® report, there are multiple surface water bodies on the Eastern Site which relate to drainage systems which extend across the Eastern Site, streams and inland rivers (Lode Dike). Stringside Stream is present on-site in Parcel 1 and Parcel 3. Old Carr Stream is present on site in Parcel 1. There are no surface water abstraction points recorded within the Eastern Site. There are five surface water abstraction points recorded within 250m of the boundary of Parcel 1, in the south, east and west. There is one abstraction point noted to be on-site, however, analysis of the map shows this is off-site, within 250m of the boundary and is included above. According to the Groundsure® report, parts of the Eastern Site are within an area designated at high risk from flooding from rivers, although this appears to be confined to the main drains, streams and inland rivers found on-site. Most of the land is shown as very low risk with the high risk areas for each parcel identified below. • Parcel 1: High risk in south-western and eastern corners. • Parcel 2: No high risk areas. • Parcel 3: High risk in western extent, around Lode Dike. • Parcel 4: High risk in south-eastern corner. The flood maps presented within the Groundsure® Report show that the Site is predominantly located within no Flood Zone. There are localised areas of 'Flood Zone 3' and 'Flood Zone 2' recorded to be present within Parcel 1, Parcel 3 and Parcel 4. 'Flood Zone 2' is described as "covering land between Flood Zone 3 and the extent of the flooding from rivers or the sea with a 1 in 1000 (0.1%) chance of flooding each year". 'Flood Zone 3' is described as "covering land with a 1 in 100 (1%) or greater chance of flooding each year from rivers or a 1 in 200 (0.5%) or greater chance of flooding each year from the sea". Localised areas across the Site are shown to be at risk from surface water flooding (1 in 30-year event), with depths greater than 1.0m. With respect to groundwater flooding, the Eastern Site is indicated to have a predominantly moderate risk of groundwater emergence, however, there are sections which are high risk, specifically in Parcel 1 and Parcel 3.
Ground Stability	Groundsure® records suggest negligible to low risk from shrinking or swelling clay ground for the Eastern Site. The Eastern Site has a low risk from running sand conditions. For risk of compressible deposits, the risk is considered predominantly negligible, with high risk areas noted in the east and west sections of Parcel 1. The Eastern Site is at negligible to very low risk of collapsible deposits and negligible to very low risk from landslides. As regards ground dissolution of soluble rocks, it is at a negligible to very low risk.
Mining and Mineral Extraction	The Groundsure® records, however, indicate historical surface ground workings to have been, or be, present on-site associated with BritPits and surface ponds.

	A desk-based study and site walkover was undertaken to assess these features. It was noted in the site walkover that these sites are not active, and there was no evidence of their workings being present. There were further surface ground workings noted within 250m of the Eastern Site. There are no incidents reported of natural cavities, mining cavities or recent incidents relating to sinkholes on-site or within 1000m of the site boundary.
Sensitive Land Uses	The Eastern Site is within a Site of Special Scientific Interest (SSSI) Impact Risk Zone. This zone was developed to allow rapid initial assessment of the potential risks to the SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. No SSSI is present on-site. One SSSI is present off-site at the southern boundary of Parcel 1, Boughton Fen, a lowland fen, marsh and swamp.
Ground Gas Radon	The Eastern Site is not located within a radon affected area, with the highest values between 1% and 3% of properties above the action level. No radon protection measures are highlighted as being required.
Unexploded Ordnance (UXO) Risk	The Zetica[4] online maps indicate that most of the Eastern Site is at low risk from UXO. The area in the north of Parcel 1, the old site of RAF Barton Bendish is recommended for further research by the UXO Pre Desk Study Assessment (PDSA), Annex E, due to the previous land use and potential for UXO presence. Any parts of the Eastern Site being within 0.3km of the existing RAF Marham site are flagged as moderate risk and requiring detailed risk assessments due to the proximity to RAF site.

2.5 Regulatory Databases

2.5.1 Permits Consents and Authorisations

A summary of pertinent environmental information related to the Eastern Site is presented in **Table 2.3**. This is based on a full list of permits, consents and authorisations including discharge consents, pollution incidents and other environmental information, included in the Groundsure® Report.

[4] this information is a pre-desk study assessment retrieved from a free online resource https://zeticauxo.com/guidance/risk-maps/

Table 2.3 Factors Affecting the Eastern Site's Environmental Status

Feature	No. of entries within 250m of the Site	Status
Historical industrial land uses	40	Fifteen on-site records related to an unspecified heap, corn windmill, unspecified pit, unspecified tanks and airfield. The remaining uses relate to various historical uses outside the Eastern Site boundaries including unspecified pit, sewage works, filter beds, unspecified heap, quarry and old brick yard.
Current Industrial Sites	26	There are zero on-site records. The off-site uses include substations, storage tank, farms, petrol station and a sewage pumping station.

2.5.2 Landfill Sites

There are no records of historical or active landfills within the boundary of the Eastern Site within the Groundsure® Report. There is one small historical landfill on Environment Agency (EA) records adjacent to the northern boundary of Parcel 3, along Swaffham Road.

There are no active landfills present within 500m of the Eastern Site.

There is a record of eight waste exemptions on the Eastern Site (Parcel 2), relating the disposing or using of waste.

2.6 Site Walkover Summary

An engineer from Turnkey undertook a site walkover between 18th and 21st May 2026. Photographs are presented in **Annex B**, with a photo location drawing for each Parcel.

The Eastern Site in its entirety currently consists of agricultural fields, isolated woodland and extensive drainage ditches.

Access is comprehensive across the Eastern Site with the use of various roads across the Eastern Site to access the fields.

Most of the fields are bounded by drainage ditches with water observed in most drains. The drains vary in depth from 1 to 3m. Water depth ranged from 0 – 0.5m.

There was no observation of contamination recorded during the walkover survey. There was no evidence of historical tanks or surface excavation workings.

There was active use of stockpiles of ash and manure, potentially being mixed, to be used as a fertiliser on-site. This seems to be standard practice and was present locally across all four land parcels.

A small incinerator was noted at the farmhouse in the central part of Parcel 3. It appeared to be more of a domestic incinerator, and no contamination was noted in the vicinity.

Two tall silos were noted at the centre of Parcel 2 which were in use, likely for fertiliser or seed.

There were no significant features identified from a land quality interest in the northern section of Parcel 1, the site of the former RAF Barton Bendish.

2.7 Previous Site Investigation Information

Turnkey has not been provided with any previous site investigations for the Eastern Site, either focused on land contamination or geotechnical.

2.8 Summary of Baseline Conditions for Parts 2 to 4 of the Eastern Site

Parts 2 to 4 of the Eastern Site are the three sections of cable route that connect the four land parcels of the Eastern Site. See **Figure 2.1** for locations.

2.8.1 Part 2 Baseline Conditions

The National Grid Reference for the centre of Part 2 is 569385 N, 307154 E and occupies an area of approximately 13.8 hectares. Part 2 is agricultural in nature and comprises arable fields and lies directly to the south of Mill Farm and to the east of residential properties and allotment gardens on Marham Road. Residential and farm buildings are present in the vicinity of the site. No significant commercial or industrial development is present on-site or nearby. The site lies to the north-east of the rural village of Fincham.

Site History

Part 2 of the Eastern Site has comprised open, undeveloped land since historical mapping records began.

Industrial Land Use

There are no records of historical pits recorded within Part 2. Records on non-coal mining relating to chalk extraction are recorded on site. Wider former pits are present around the site, over 150m from the site.

A former corn windmill (dating to 1883) and a former pumping station (dating to 1983) are recorded by GroundSure® approximately 21m north and approximately 37m north of Part 2 respectively.

There are no records of historical tanks, historical petrol stations, historical garages or historical energy features recorded on-site.

No active, recent or historical landfill sites are recorded by GroundSure® on-site or within 250m of Part 2. There are no historical or licensed waste sites on site or within a 250m radius of Part 2.

There is no recent industrial land uses recorded on-site or within a 125m radius of Part 2.

There are no sites determined as Contaminated Land under Part 2a of the EPA 1990.

Geology and Radon

There are no mapped areas of Made or Worked Ground shown on BGS mapping. Limited Made Ground is potentially present in localised areas associated with the roadways on-site, but there is no indication that extensive areas of artificial ground exist.

Part 2 is recorded to be directly underlain by the Lowestoft Formation superficial deposits. The bedrock beneath the site comprises the West Melbury Marly Chalk Formation (Chalk).

No natural cavities are recorded on-site, and no significant soluble rock risk is recorded on-site.

No significant risks from radon are recorded on-site and no significant ground hazards are recorded by GroundSure®.

Hydrogeology

Part 2 is underlain by a Secondary Undifferentiated Aquifer, relating to the Lowestoft Formation. The underlying bedrock is a Principal Aquifer, relating to the West Melbury Marly Chalk Formation (Chalk). Part 2 is shown as having medium to high groundwater vulnerability.

There are no groundwater SPZs on-site according to the GroundSure® Report and no groundwater abstractions recorded on-site or within 125m of Part 2.

Hydrology and Flood Risk

No surface water features are recorded by GroundSure® to be present on-site.

Part 2 lies within two WFD surface waterbody catchments relating to Polver Drain and Stringside Stream. The site also lies within the WFD groundwater body catchment relating to Cam and Ely Ouse Chalk.

There is no surface water abstractions recorded on-site.

There are no licensed discharges to controlled waters or pollution incidents recorded on-site or within a 125m radius of Part 2.

Part 2 is recorded as being at negligible risk of river and coastal flooding and lies outside of Flood Zone 2 and Flood Zone 3. No flood defences are recorded on-site. A negligible risk of surface water flooding and a low to moderate risk of groundwater flooding is recorded on-site by GroundSure®.

Sensitive Land Uses

No sensitive land uses are recorded on Part 2 or within a 250m radius of the site boundary.

2.8.2 Part 3 Baseline Conditions

The National Grid Reference for the centre of Part 3 is 572302 N, 307167 E and occupies an area of approximately 12.07 hectares. Part 3 is agricultural in nature and comprises part of Swaffham Road (the A1122 road) and arable fields which lie directly to the south of the roadway. Part 3 of the Eastern Site lies to the south of RAF Marham, which is accessed via King Charles III gate on the northern side of Swaffham Road (the A1122 road). This facility is the main UK base for the F-35B Lightning stealth fighter force, which is operated jointly by the RAF and the Royal Navy. Cherry Tree Farm lies directly north of Part 3.

Residential and farm buildings are present in the vicinity of Part 3. Apart from RAF Marham, no significant commercial or industrial development is present on-site, or nearby. The site lies to the north-east of the rural village of Barton Bendish.

Site History

Part 3 of the Eastern Site has comprised open, undeveloped land since historical mapping records began.

The perimeter of RAF Marham has been present adjacent to Part 3 since the 1950s, with historical OS maps showing perimeter fencing potentially encroaching onto Part 3 at the junction of White Road and Swaffham Road (the A1122 road) during this >75-year period. Despite this, Part 3 is known to have never formed part of RAF Marham.

Industrial Land Use

There are no records of historical pits recorded on-site by GroundSure®. Records on non-coal mining relating to chalk extraction are recorded on Part 3.

There are no records of historical tanks, historical petrol stations, historical garages or historical energy features recorded on-site.

No active, recent or historical landfill sites are recorded by GroundSure® on-site or within 250m of Part 3. There are no historical or licensed waste sites on-site or within a 250m radius of Part 3.

Except for RAF Marham which lies adjacent to the site, there are no further recent industrial land uses recorded on-site or within a 125m radius of Part 3 of the Eastern Site.

There are no sites determined as Contaminated Land under Part 2a of the EPA 1990.

Geology and Radon

There are no mapped areas of Made or Worked Ground shown on BGS mapping. Limited Made Ground is potentially present in localised areas associated with tracks, roadways or perimeter fencing, but there is no indication that extensive areas of artificial ground exist.

Part 3 is recorded to be directly underlain by Chalk bedrock, comprising the West Melbury Marly Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation (Undifferentiated) and Melbourn Rock Member. No superficial deposits are recorded to be present on-site.

No natural cavities are recorded on-site, and no significant soluble rock risk is recorded on-site.

No significant risks from radon are recorded on-site and no significant ground hazards are recorded by GroundSure®.

Hydrogeology

Part 3 is underlain by a Principal Aquifer, relating to the West Melbury Marly Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation (Undifferentiated) and Melbourn Rock Member. Part 3 is shown as having high groundwater vulnerability.

There are no groundwater SPZs on-site and no groundwater abstractions recorded on-site or within 125m of the site boundary.

Hydrology and Flood Risk

Four drains are recorded by GroundSure® to be present on-site, one of which is recorded to lie below ground level on-site.

Part 3 lies within a WFD surface waterbody catchment relating to Stringside Stream. Part 3 also lies within a WFD groundwater body catchment relating to the Cam and Ely Ouse Chalk.

There are no surface water abstractions recorded on Part 3 of the Eastern Site.

There are no licensed discharges to controlled waters or pollution incidents recorded on-site or within a 125m radius of Part 3. The closest discharge consents to Part 3 are recorded approximately 95m and 155m north of Part 3 within RAF Marham and relate to the discharge of sewage (final / treated effluent – not water company) and site drainage discharges into a soakage ditch and Polver Drain. No further discharge consents are recorded within a 250m radius of Part 3.

Part 3 is recorded as being at negligible risk of river and coastal flooding and lies outside of Flood Zone 2 and Flood Zone 3. No flood defences are recorded on-site. A negligible to high risk of surface water flooding and a moderate to high risk of groundwater flooding are recorded on-site by GroundSure®.

Sensitive Land Uses

No sensitive land uses are recorded on-site or within a 250m radius of Part 3.

2.8.3 Part 4 Baseline Conditions

The National Grid Reference for the centre of Part 4 is 571285 N, 306254 E and occupies an area of approximately 24.39 hectares. Part 4 is agricultural in nature and comprises arable fields. Part 4 crosses Boughton Long Road and lies directly east of Ash Holt Plantation. Some residential areas, farm buildings and wider pockets of woodland are present nearby. No commercial or industrial development is present on-site. Part 4 lies to the south of the rural village of Barton Bendish.

Site History

Large areas of Part 4 have comprised open, undeveloped land since historical mapping records began. A disused chalk pit (dating to the 1980s) is recorded on site. Further chalk pits are recorded around Part 4, from approximately 16m south of the site (dating to between 1884 to 1983).

The eastern half of Part 4 lies partially within the footprint of the former RAF Barton Bendish airfield, but this not shown on historical mapping. This facility was an unpaved airfield used temporarily during World War II between 1939 and 1942.

Industrial Land Use

A disused chalk pit (dating to the 1980s) is recorded on Part 4 with additional chalk pits and workings present within the nearby area.

There are no records of historical tanks, historical petrol stations, historical garages or historical energy features recorded on-site.

No active, recent or historical landfill sites are recorded by GroundSure® on-site or within 250m of Part

4. There are no historical or licensed waste sites on-site or within a 250m radius of Part 4.

Except for former RAF Barton Bendish airfield, there are no further recent industrial land uses recorded on-site or within a 125m radius of Part 4.

There are no sites determined as Contaminated Land under Part 2a of the EPA 1990.

Geology and Radon

There are no mapped areas of Made or Worked Ground shown on BGS mapping. Limited Made Ground is potentially present in localised areas associated with former chalk extraction on-site, roads and tracks, but there is no indication that extensive areas of artificial ground exist.

Part 4 is recorded to be directly underlain by Chalk bedrock, comprising the West Melbury Marly Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation (Undifferentiated) and Melbourn Rock Member. No superficial deposits are recorded to be present on-site.

No natural cavities are recorded on-site, and no significant soluble rock risk is recorded on-site.

No significant risks from radon are recorded on-site and no significant ground hazards are recorded by GroundSure®.

Hydrogeology

Part 4 is underlain by a Principal Aquifer, relating to the West Melbury Marly Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation (Undifferentiated) and Melbourn Rock Member. Part 4 is shown as having high groundwater vulnerability.

There are no groundwater SPZs on site and no groundwater abstractions recorded on-site or within 125m of Part 4 by GroundSure®.

Hydrology and Flood Risk

One unnamed land drain is recorded by GroundSure® to be present on-site.

Part 4 lies within a WFD surface waterbody catchment relating to Stringside Stream. Part 4 also lies within a WFD groundwater body catchment relating to the Cam and Ely Ouse Chalk.

There is no surface water abstractions recorded on-site. There are no licensed discharges to controlled waters or pollution incidents recorded on-site or within a 125m radius of Part 4.

The western corner of Part 4, adjacent to Ash Holt Plantation has a low to high risk of river and coastal flooding, with the remainder of Part 4 recorded a negligible flood risk. Parts of the western corner of Part 4 lie with Flood Zone 2 and Flood Zone 3. No flood defences are recorded on-site. A maximum high risk of surface water flooding and groundwater flooding is recorded on-site by GroundSure®, with the western corner of Part 4 recorded to be at greater risk of flooding.

Sensitive Land Uses

No sensitive land uses are recorded on-site or within a 250m radius of Part 4.

2.8.4 UXO Risk

Any areas within a 0.3km radius of RAF Marham were flagged by Zetica Ltd as automatically having an increased UXO risk, recorded to be moderate. Part 3 of the Eastern Site is within 0.3km of RAF Marham and hence is classified as a moderate risk area. In moderate risk areas, detailed UXO risk assessment is deemed to be required if there is going to be significant excavation works in an area of proposed development.

Part 4 of the Eastern Cable Route lies partially within the footprint of the former RAF Barton Bendish airfield. This area was recommended for further research by Zetica Ltd as part of the UXO Pre-Desk Study Assessment (PDSA). This was due to the previous land use and potential for UXO presence in this area. A copy of the PDSA is included in Annex E.

3. Preliminary Environmental Risk Assessment

3.1 Introduction

The risk posed by contaminants in soil or groundwater will depend on the nature of the hazard, the probability of exposure, the pathway by which exposure occurs, and the likely effects on the receptors. A contaminant is defined as a substance that has the potential to cause harm, while a risk is considered to exist if such a substance is present in sufficient concentration to cause or potentially cause significant harm and a pathway exists for a receptor to be exposed to the substance.

The following sections discuss all the identified potential sources, pathways and receptors in the context of the Proposed Development and plausible pollutant linkages which may represent a risk to identified receptors such as human health and/or controlled waters (e.g. surface waters and groundwater) from the data gained from the desk study. At this stage the assessment is qualitative and aimed to determine all pollutant linkages, irrespective of significance or allowing for uncertainty.

Three potential contaminant impact scenarios exist for any given site; these are:

- The site impacting upon itself;
- The site impacting on its surroundings; and
- The surroundings impacting on the site.

3.2 Preliminary Conceptual Site Model

A Source – Pathway – Receptor assessment has been undertaken for the Eastern Site based on the information provided in the preceding sections. Source, pathway and receptors are defined as:

- Sources (S): These are potential or known sources of contamination that may relate to a former land use or present site feature or process (e.g., fuel storage tanks).

- Pathways (P): A pathway is defined as a mechanism or route by which a contaminant comes into contact with, or otherwise affects, a receptor. Pathways by which the identified receptors may be impacted upon in the context of the Proposed Development.

- Receptors (R): Receptors are defined as people, living organisms, ecological systems, controlled waters, atmosphere, structures and utilities that could be adversely affected by contaminant(s).

The preliminary CSM is presented as **Table 3.1**, which provides the site-specific sources, pathways and receptors. Of note is the lack of contaminant sources based on the desk-based information, nevertheless on a conservative basis, some historical and recent uses of the Eastern Site have been considered as a potential source of contamination.

The desk study research and site walkover indicate that the Eastern Site was undeveloped and consists predominantly of agricultural fields until present. The only exception to this is the use of the northern section of Parcel 1 for a short period of time as an airfield during the early part of World War 2.

Table 3.1 Preliminary Conceptual Site Model

Source*	Pathway	Receptors
S1: On-site: historical and current site uses, most notably possible agricultural uses (including possible sludge and ash spreading and fertiliser storage and spreading), ground workings and unspecified tanks. Partial use as an airfield WWII (Parcel 1). Made ground was not indicated to be present in the records reviewed, however there is potential for it to be encountered in areas close to farm buildings, localised infrastructure development (e.g. bases of overhead power lines) and backfilled historic surface excavations. The potential for made ground of some types to generate hazardous ground gases. Possible contaminants to include – agrochemicals, fuel oils, heavy metals, asbestos containing materials, pesticides, polyaromatic hydrocarbons (PAH), possible per- and polyfluoroalkyl (PFAS) and hazardous ground gases (carbon dioxide and methane).	**P1:** Direct contact, incidental ingestion and inhalation/respiration of windblown soils/particulates	**R1**: Construction workers / general public
		R2: Future Site users
	P2: Contaminant leaching, vertical and lateral migration into groundwater and surface water drains	**R3**: Principal Aquifer and SPZ1 in Parcel 1 - Bedrock geology; Secondary A and Undifferentiated Aquifer – Superficial geology
		R4: Surface Water features (Stringside Stream and Old Carr Stream)
	P3: Migration and accumulation of ground gases in enclosed spaces	**R1**: Construction workers / general public
		R2: Future Site users
S2: Off-site: historical and current off-site uses, most notably agricultural land and farm buildings, chalk and unspecified pit, sewage works, filter beds, unspecified heap, peat workings, quarry and old brick yard. Possible contaminants to include – agrochemicals, pesticides, heavy metals, fuel oils, PAHs, possible	**P4:** Leaching and permeation through soil profile and migration into groundwater and surface water	**R3**: Principal Aquifer and SPZ1 in Parcel 1 - Bedrock geology; Secondary A and Undifferentiated Aquifer – Superficial geology

Source*	Pathway	Receptors
(PFAS) substances and hazardous ground gases (carbon dioxide and methane).		**R4:** Surface Water features (Stringside Stream and Old Carr Stream)
		R5: Potable water abstractions to the east of Parcel 1
	P3: Migration and accumulation of ground gases in enclosed spaces	**R1**: Construction workers / general public
		R2: Future Site users

** The Source – Pathway - Receptor linkage outlined above is currently based on a general overview on the historical and current uses of the Site. If deemed required, it can be expanded and may be redefined following future assessments, as additional information on ground conditions becomes available.*

3.3 Preliminary Qualitative Risk Assessment

At this stage, the method for risk evaluation is qualitative and the risk classification rationale is explained in **Annex C** and the preliminary qualitative risk assessment (QRA) provided in **Annex D**.

3.3.1 Review of Potentially Significant Pollutant Linkages

Based on the preliminary CSM and QRA, the potential pollutant linkages for the Eastern Site have been given a **low risk** classification, with the exception of Part 4 which has been given a **low-moderate risk** classification due to the possible presence of a disused chalk pit and the fact that the eastern half occupies the footprint of the former RAF Barton Bendish airfield (as does the north of Parcel 1). For clarity, this includes all human and controlled waters receptors, subject to this planning-driven Desk Study.

Localised areas of Made Ground, contamination and infilling are considered possible in Part 4 and the northern part of Parcel 1 due to the disused chalk pit (Part 4) and the former use as an RAF airfield. Part 4 is directly underlain by a Principal Chalk Aquifer and has high groundwater vulnerability and hence there is the potential for any previously unidentified contamination that may be present to impact the underlying Chalk aquifer and land drain present on-site.

Whilst significant sources of contamination have not been identified within the Eastern Site there is potential for low level contamination across the Eastern Site to be present within the topsoil, associated with spreading of sludges, waste ash and pesticides on fields – contaminant buildup may occur over time. Although topsoil may be stripped as part of any future development, it is possible this may be reused in landscaping areas; thus, the testing of topsoil is recommended to ensure confidence in its safe reuse.

In line with the above, despite the generally low risk classification, a limited site investigation is recommended to assess the quality of topsoil present at the Eastern Site. A limited site investigation may also be required on the site of the historical RAF Barton Bendish in the north of Parcel 1 and Part 4 depending on whether there will be significant excavation works in this area.

Most of the Eastern Site is identified as low risk from UXO. However, due to the close proximity of RAF Marham, parts of the Eastern Site within 0.3km of RAF Marham are flagged as a moderate risk requiring a detailed UXO risk assessment. Locations within 0.3km are in the north of Parcel 2 and the north-east of Parcel 3 plus Part 3. This may be required depending on if there will be significant excavation works in the area. The area in the north of Parcel 1, the old site of RAF Barton Bendish is recommended for further research by the UXO Pre Desk Study Assessment (PDSA), found in Annex E, due to the previous land use and potential for UXO presence.

In addition, a Discovery Strategy protocol should be included in the Construction Phase Environmental Management Plan (oCEMP) to ensure that contamination identified during construction is assessed by a specialist in land contamination. This will include but not be limited to stopping works in the area where any unexpected contamination is identified and ensuring the identified contamination does not pose a risk until an environmental specialist undertakes an assessment and a method is agreed to deal with the identified contamination. Procedures for dealing with unexpected contamination should also be developed and included in the Discovery Strategy.

4. Conclusions and Recommendations

4.1 Conclusions

The Eastern Site is currently made up of agricultural fields and isolated woodland and is slightly undulating with an increase in level, from 5m to 25m AOD, increasing from south to north. There are a series of drainage channels throughout the Eastern Site.

Based on information published by the British Geological Survey, the Eastern Site is underlain by various superficial geology, depending on parcel location, including Lowestoft Formation, Peat and Alluvium. The Lowestoft Formation is comprised of chalky till with outwash sands and gravels, and clay and silt.

The bedrock geology is indicated to be Chalk, identified in three formations; West Melbury Marly Chalk Formation, Holywell Nodular Chalk Formation and New Pit Chalk Formation (undifferentiated) and Melbourn Rock Member.

There are two groundwater SPZs noted within the Eastern Site. SPZ1 is located on the eastern most boundary of Parcel 1, encroaching within the Eastern Site slightly. SPZ3 is in the eastern half of Parcel 2. Parcel 3 and Parcel 4 have no groundwater SPZ within the Parcel boundaries.

There are no potable water abstraction points within the Eastern Site, or within 250m of the Eastern Site The closest, and only, potable water extraction points are approximately 600m from the eastern boundary of Parcel 1.

Based on the historical maps, majority of the Eastern Site has been open fields since the late 1880s and likely used for agricultural purposes around the period. Additional historical information indicates the most significant historical use recorded on the Eastern Site is RAF Barton Bendish in the northern section of Parcel 1. This was a satellite airfield of the nearby RAF Marham and was only in operation between 1939 and 1942.

The immediate surrounding land comprises open fields, villages and woodland. The Eastern Site is near to villages in the north, west and south, with the closest being Fincham to the west of Parcel 3 and south of Parcel 4. RAF Marham is present to the north of Parcel 2, Part 3 and east of Parcel 3.

Based on the preliminary CSM and QRA, the potential pollutant linkages associated with the majority of the Eastern Site have been given a low risk classification for risks to human and controlled waters receptors. The exception is Part 4 of the Eastern Site which has been given a low-moderate risk classification due to the possible presence of a disused chalk pit and the fact it occupies (in part) the former footprint of RAF Barton Bendish airfield.

4.2 Recommendations

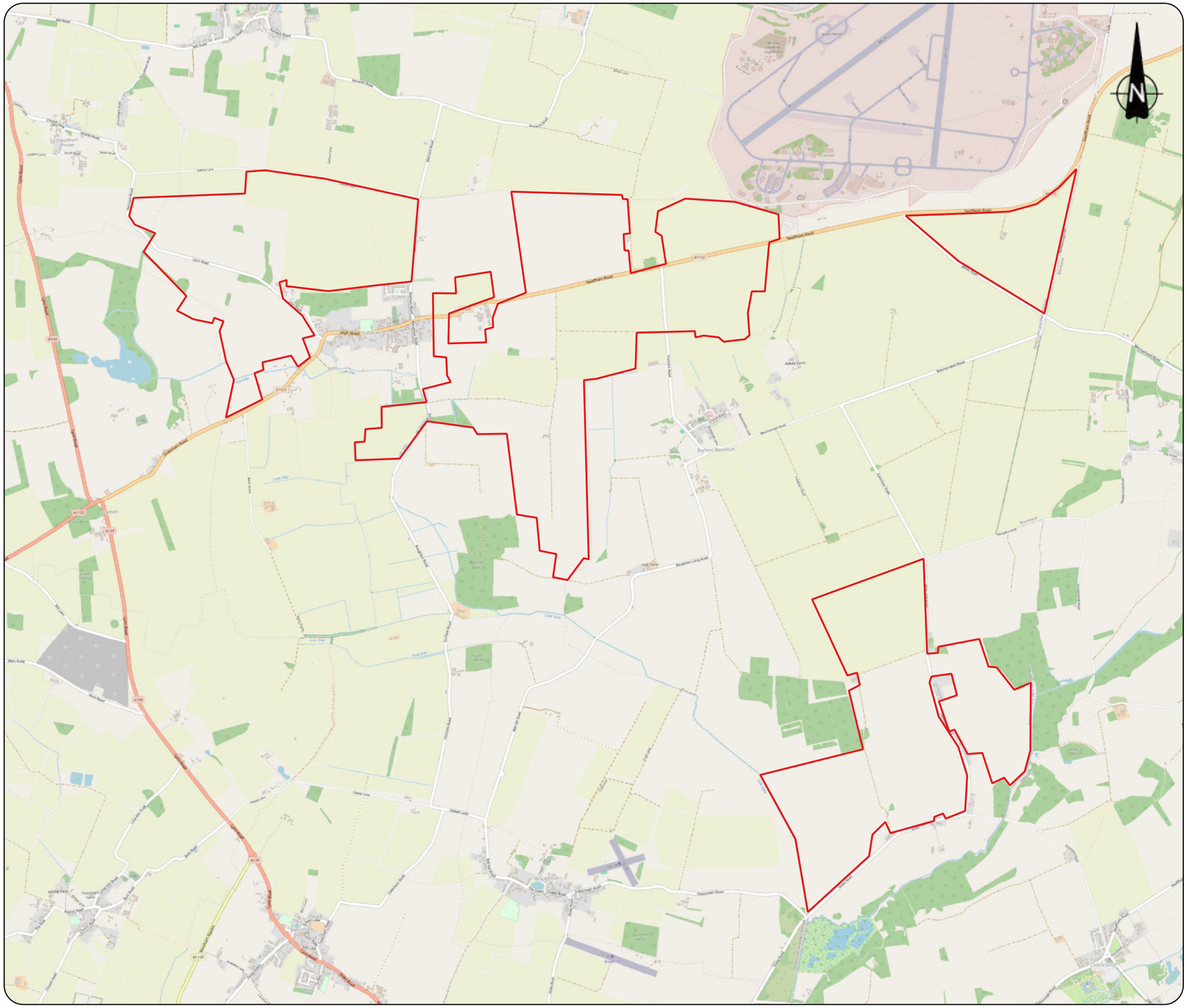
Whilst the risk of encountering significant contamination has been assessed as low, the following recommendations are provided to ensure robust risk management during the development.

- Despite the low risk classification, a limited site investigation is recommended to assess the quality of topsoil present at the Eastern Site. A limited site investigation may also be required on the site of the historical RAF Barton Bendish, with UXO oversight, in the north of Parcel 1 and Part 4 (depending on whether there will be significant excavation works in this area) and to investigate any infill of the disused chalk pit on Part 4. This may include ground gas / vapour monitoring depending upon the nature of any infill material encountered and the proposed works for this area.
- Despite the low risk classification for PFAS and pesticide sources on the Eastern Site, it is important to confirm specific consideration regarding historical agricultural practices. It may be prudent to verify, through the landowner/farmer and local authority records, whether treated sewage sludge and pesticides were historically spread on the land. The application of these compounds creates a possible pathway for introducing PFAS and pesticide compounds into soils. The confirmation of these activities would inform the decision for targeted sampling and

analysis of the topsoil for a suite of PFAS and pesticide compounds. This targeted verification would provide greater certainty in soil quality characterisation whilst ensuring the robust management of materials for possible reuse, being mindful of the future end use (solar farm, BESS Units and Substation), i.e. typically unmanned, meaning even should these practices be confirmed, the low risk classification is likely to appropriate regarding human health.

- Implementation of a Discovery Strategy (as needed) - this should be included in the oCEMP to ensure that any contamination identified during construction is assessed by a specialist in land contamination. This will include but not be limited to stopping works in the area where any unexpected contamination is identified and ensuring the identified contamination does not pose a risk until an environmental specialist undertakes an assessment and a method is agreed to deal with the identified contamination.
- Unexpected Contamination Protocol – a clear protocol for dealing with unexpected contamination should be established, as needed. Similar to the Discovery Strategy, this will typically include immediate cessation of works, notification of the Project Manager and engagement of a suitably qualified land contamination specialist and their assessment of the contamination.
- Demolition Plans – for removal of any existing agricultural structures, a specific plan should be developed.
- The majority of the Eastern Site is identified as low risk from UXO. However, due to the close proximity of RAF Marham, parts of the Eastern Site within 0.3km of RAF Marham are flagged as a moderate risk requiring a detailed UXO risk assessment. Locations within 0.3km are in the north of Parcel 2, north-east of Parcel 3 and Part 3. This may be required depending on if there will be significant excavation works in the area.
- The area in the north of Parcel 1 and eastern section of Part 4, the old site of RAF Barton Bendish is recommended for further research by the UXO Pre Desk Study Assessment (PDSA), found in Annex E, due to the previous land use and potential for UXO presence.

Annex A – Eastern Site Boundary



Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). © https://www.openstreetmap.org and contributors.

REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	31/05/2026	First issue	JS	JW	DR

LEGEND

Site boundary

0 500 1,000 m

Scale at A3: 1:30000

Client
Logika Consultants Ltd

Project
Longmarsh Green (East Site)

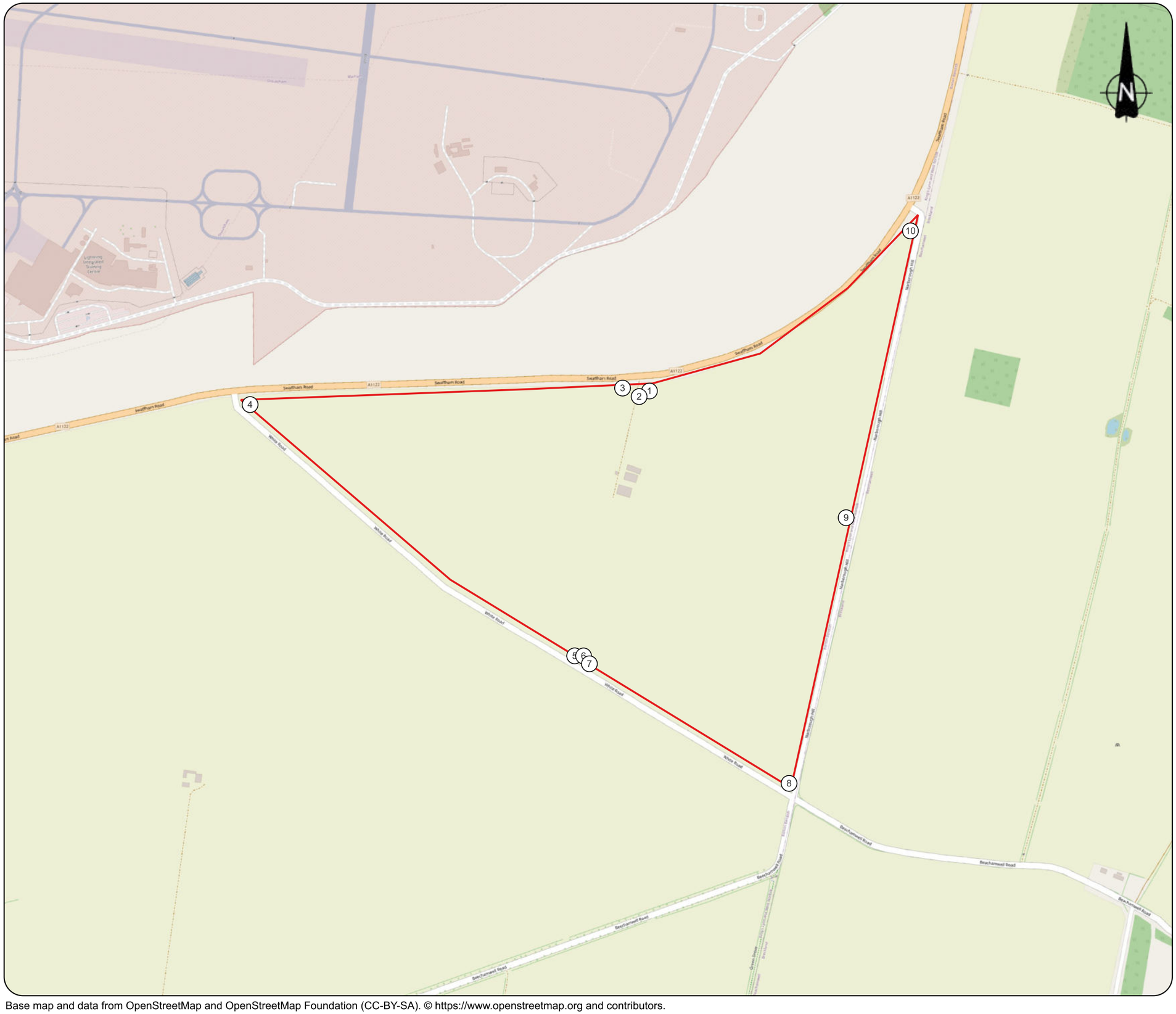
Title
Figure 1
Redline Boundary

Turnkey Regeneration
2 Caffyn Place
Broadbridge Heath
Horsham
West Sussex
RH12 3XH
Tel: 07540 295282
dave.rutherford@turnkeyregeneration.com
www.turnkeyregeneration.com

Drawn	Checked	Approved	Revision
JS	JW	DR	00
Date		Scale	Steet Size
May 2026		1:30000	A3

Drawing Number
0212-003-00

Annex B – Site Photographs



Base map and data from OpenStreetMap and OpenStreetMap Foundation (CC-BY-SA). © https://www.openstreetmap.org and contributors.

REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	31/05/2026	First issue	JS	JW	DR

LEGEND

Site boundary

1 Photograph location

0 200 400 m

Scale at A3: 1:7500

Client
Logika Consultants Ltd

Project
Longmarsh Green (East Site)

Title
Figure 3
Parcel 2 Photograph locations

Turnkey Regeneration
2 Caffyn Place
Broadbridge Heath
Horsham
West Sussex
RH12 3XH
Tel: 07540 295282
dave.rutherford@turnkeyregeneration.com
www.turnkeyregeneration.com

Drawn	Checked	Approved	Revision
JS	JW	DR	00
Date		Scale	Steet Size
May 2026		1:7500	A3

Drawing Number
0212-005-00

ANNEX B - LONGMARSH GREEN (EAST SITE PARCEL 2) PHOTOGRAPHS



Picture 1 – facing east



Picture 2 – facing south



Picture 3 – facing south west



Picture 4 – facing south east



Picture 5 – facing north west



Picture 6 – facing north



Picture 7 – facing east



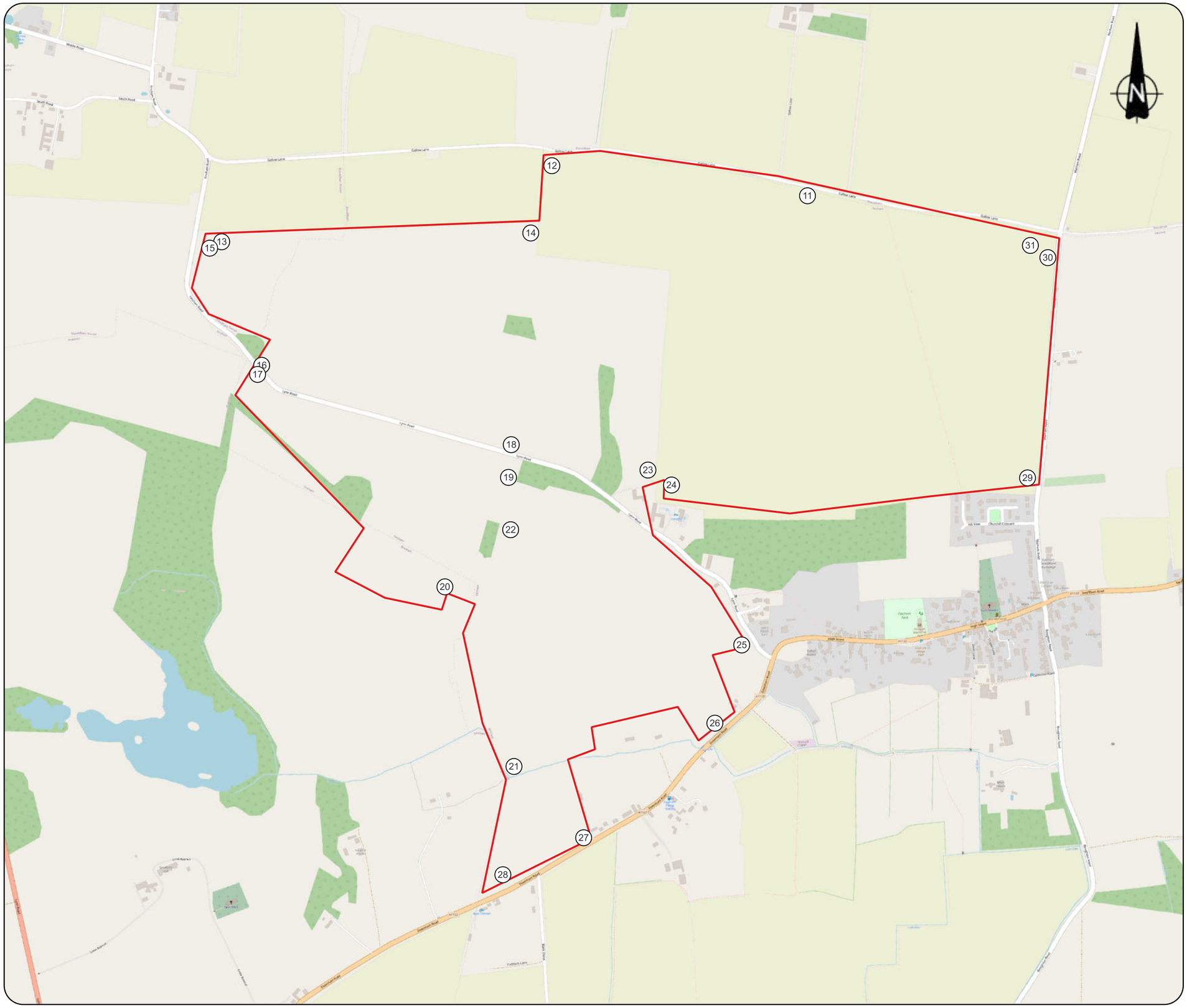
Picture 8 – facing north west



Picture 9 – facing west



Picture 10 – facing south west



REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	31/05/2026	First issue	JS	JW	DR

LEGEND

Site boundary

1 Photograph location

0 250 500 m

Scale at A3: 1:10000

Client
Logika Consultants Ltd

Project
Longmarsh Green (East Site)

Title
Figure 5
Parcel 4 Photograph locations

Turnkey Regeneration
2 Caffyn Place
Broadbridge Heath
Horsham
West Sussex
RH12 3XH

Tel: 07540 295282

dave.rutherford@turnkeyregeneration.com
www.turnkeyregeneration.com

Drawn	Checked	Approved	Revision
JS	JW	DR	00

Date	Scale	Steet Size
May 2026	1:10000	A3

Drawing Number
0212-007-00

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ANNEX B - LONGMARSH GREEN (EAST SITE PARCEL 4) PHOTOGRAPHS



Picture 11 – facing south



Picture 12 – facing south east



Picture 13 – ash and manure/soil stockpile, seemingly for fertilising



Picture 14 – facing south



Picture 15 – facing south east



Picture 16 – facing north east



Picture 17 – facing south



Picture 18 – facing north



Picture 19 – facing south west



Picture 20 – facing north west



Picture 21 – facing north east



Picture 22 – facing south east



Picture 23 – facing north



Picture 24 – facing east



Picture 25 – facing north west



Picture 26 – facing north west



Picture 27 – facing north west



Picture 28 – facing north east



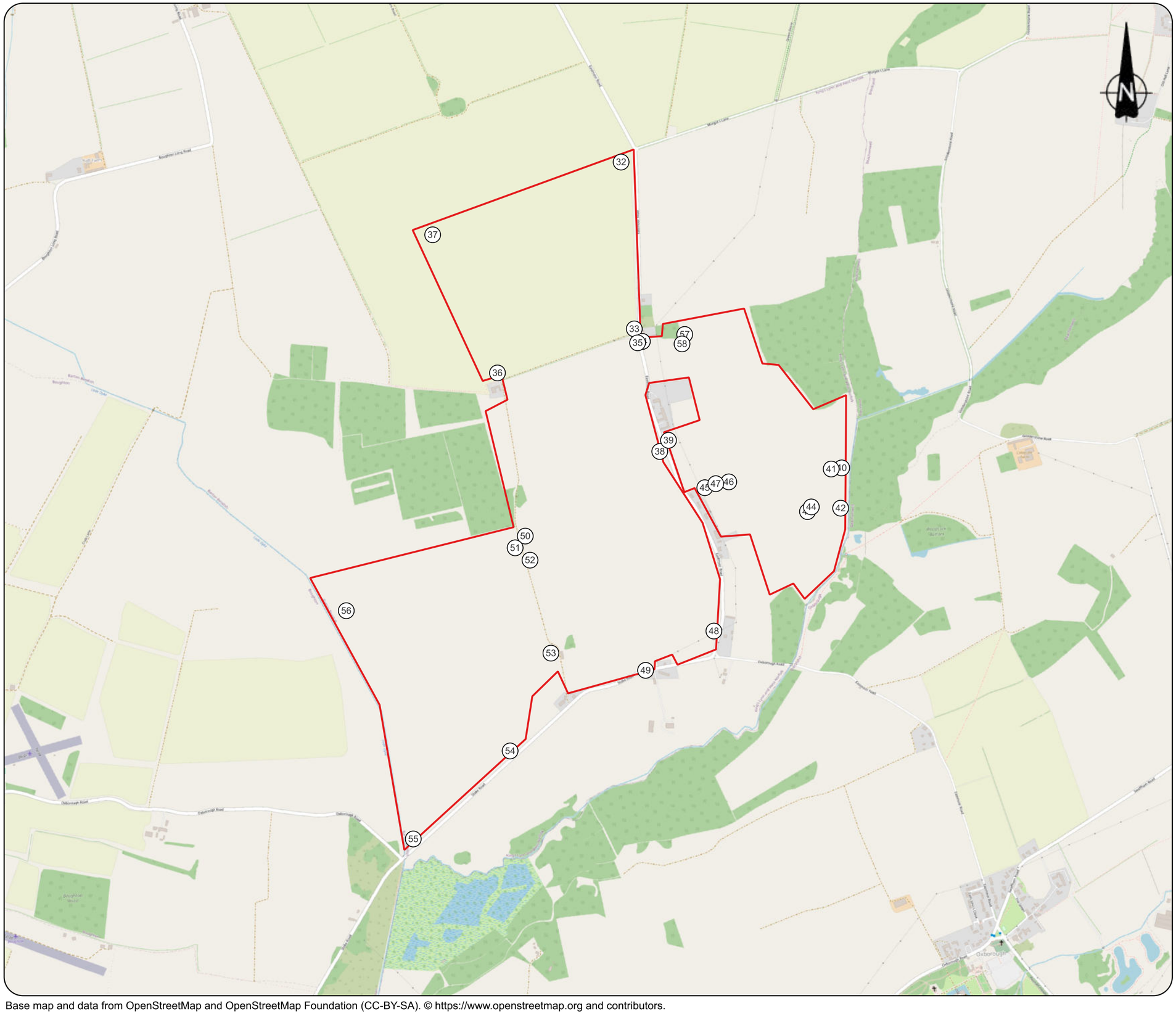
Picture 29 – facing west



Picture 30 – facing south



Picture 31 – facing west



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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	31/05/2026	First issue	JS	JW	DR

LEGEND

- Site boundary
- (1) Photograph location

0 250 500 m

Scale at A3: 1:15000

Client
Logika Consultants Ltd

Project
Longmarsh Green (East Site)

Title
Figure 2
Parcel 1 Photograph locations

Turnkey Regeneration
2 Caffyn Place
Broadbridge Heath
Horsham
West Sussex
RH12 3XH
Tel: 07540 295282
dave.rutherford@turnkeyregeneration.com
www.turnkeyregeneration.com

Drawn	Checked	Approved	Revision
JS	JW	DR	00

Date	Scale	Steet Size
May 2026	1:15000	A3

Drawing Number
0212-004-00

ANNEX B - LONGMARSH GREEN (EAST SITE PARCEL 1) PHOTOGRAPHS



Picture 32 – facing south west



Picture 33 – facing north west



Picture 34 – facing south east



Picture 35 – facing south west



Picture 36 - facing north



Picture 37 – facing south



Picture 38 – facing west



Picture 39 – facing east



Picture 40 – facing north



Picture 41 – facing north west



Picture 42 – facing south west



Picture 43 – facing south west



Picture 44 – facing west



Picture 45 – facing south east



Picture 46 – facing north



Picture 47 – stockpile remnants



Picture 48 – facing west



Picture 49 – facing north



Picture 50 – facing north east



Picture 51 – facing west



Picture 52 – facing east



Picture 53 – facing south west



Picture 54 – facing north



Picture 55 – facing north east



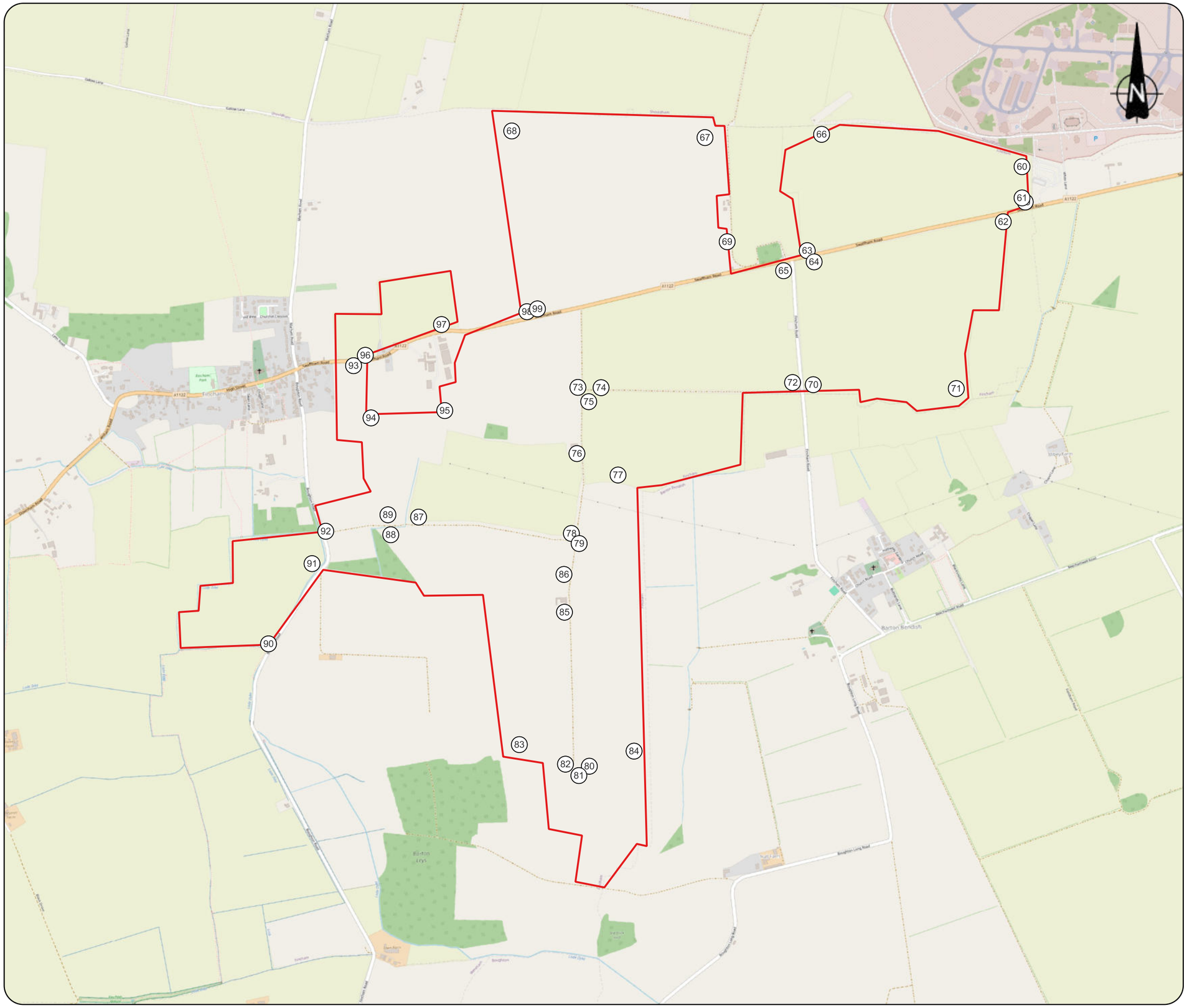
Picture 56 – facing east



Picture 57 – facing south east



Picture 59 – facing south



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REVISIONS

REV	DATE	DESCRIPTION	DWN	CHK	APP
-	31/05/2026	First issue	JS	JW	DR

LEGEND

Site boundary

1 Photograph location

0 250 500 m

Scale at A3: 1:15000

Client
Logika Consultants Ltd

Project
Longmarsh Green (East Site)

Title
Figure 4
Parcel 3 Photograph locations

Turnkey Regeneration
2 Caffyn Place
Broadbridge Heath
Horsham
West Sussex
RH12 3XH
Tel: 07540 295282
dave.rutherford@turnkeyregeneration.com
www.turnkeyregeneration.com

Drawn	Checked	Approved	Revision
JS	JW	DR	00

Date	Scale	Steet Size
May 2026	1:15000	A3

Drawing Number
0212-006-00

ANNEX B - LONGMARSH GREEN (EAST SITE PARCEL 3) PHOTOGRAPHS



Picture 59 – facing west



Picture 60 – facing north west



Picture 61 – ash stockpile



Picture 62 – facing south west



Picture 63 – facing north



Picture 64 – facing south



Picture 65 – facing south west



Picture 66 – facing south east



Picture 67 – facing south



Picture 68 – facing south



Picture 69 – facing west



Picture 70 – facing north east



Picture 71 – facing north



Picture 72 – facing west



Picture 73 – facing north west



Picture 74 – ash stockpile



Picture 75 – facing south east



Picture 76 – facing west and stockpiles



Picture 77 – facing east



Picture 78 – facing north west



Picture 79 – facing south east



Picture 80 – facing south



Picture 81 – facing south west



Picture 82 – facing west



Picture 83 – facing north



Picture 84 – facing north



Picture 85 – small domestic incinerator



Picture 86 – ash stockpile



Picture 87 – facing south east



Picture 88 – facing north



Picture 89 – facing west



Picture 90 – facing north west



Picture 91 – facing north east



Picture 92 – facing south west



Picture 93 – facing south



Picture 94 – facing east



Picture 95 – facing north



Picture 96 – facing north west



Picture 97 – facing north



Picture 98 – facing east



Picture 99 – facing north east

Annex C – Risk Classification Rationale

Identification of Unacceptable Risk

The method for risk evaluation is qualitative and is developed from the model provided in CIRIA C552 Contaminated Land Risk Assessment – a guide to good practice (DETR 2001). It involves classifying risk in terms of (a) magnitude of the potential consequence (severity) of occurrence and (b) the probability (likelihood) of occurrence. The risk rating derived is used to determine what action, if any, is needed to further investigate that risk and/or remediate to reduce risk to an acceptable level.

Task 1: Classification of Consequence

Classification	Definition	Examples
Severe	• Short-term (acute) risk to human health likely to result in "significant harm" (as defined in EPA90 Part 2a). • Short-term (acute) risk of pollution of sensitive water resource. • Short-term (acute) risk to an ecosystem, or organism forming part of an ecosystem.	• Unusually high concentration of toxic substance on the surface of a garden or recreation area. • Major spillage of contamination from the site into controlled waters. EA Category 1 pollution incident. Closure of an abstraction point. • Explosion, causing building collapse (and death if occupied).
Medium	• Chronic damage to human health likely to result in "significant harm". • Pollution of sensitive water resource. • Significant change in a particular ecosystem, or organism forming part of such ecosystem.	• Concentration of contaminant from site exceeds generic or site-specific assessment criteria for human health or water supply pipes. Presence of asbestos. • Leaching of contaminants from a site to a principal or secondary (A) aquifer. Concentration exceeds DWS or EQS in Inner. Source Protection Zone (SPZ1). EA Category 2 pollution incident. • Death of a species or loss of habitat within an area of national importance.
Mild	• Exposure is unlikely to result in "significant harm" to human health. • Pollution of non-sensitive water resource. • Damage to sensitive buildings, structures and services or the environment.	• Concentration of contaminant from site below generic or site-specific assessment criteria. • Pollution of secondary (B or undifferentiated) aquifer. EA Category 3 pollution incident. • Damage to a building rendering it unsafe to occupy. • Death of a species or loss of habitat within an area of local importance. • Loss of plants in garden or landscape areas (BS3882 limits exceeded).
Minor	• Harm (but not significant harm) resulting in a financial loss or expenditure to resolve. • Non-permanent human health effects. • Easily repairable damage to buildings, structures and services.	• Pollution of unproductive strata.

Task 2: Classification of Probability

Classification	Definition
High Likelihood	There is a pollution linkage, and an event appears very likely in the short term and almost inevitable over the long term or there is actual evidence at the receptor of harm or pollution.
Likely	There is a pollution linkage, and all the elements are present and in the right place, which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short term and likely over the long term.
Low Likelihood	There is a pollution linkage, and circumstances are possible under which an event could occur. However, it is by no means certain that even over a longer period such event would take place and is less likely in the shorter term.
Unlikely	There is a pollution linkage, but circumstances are such that it is improbable that an event would occur in the very long term.

Task 3: Risk Estimation

		Potential Consequence			
		Severe	Medium	Mild	Minor
Probability	High Likelihood	**Very high risk**	High risk	Moderate risk	Low risk
	Likely	High risk	Moderate risk	Low risk	Low risk
	Low Likelihood	Moderate risk	Low risk	Low risk	Very low risk
	Unlikely	Low risk	Low risk	Very low risk	Very low risk
	No linkage	No risk			

Task 4: Description of the Estimated Risks and Likely Action Required

Risk	Action
Very High Risk	There is a high probability that severe harm could arise or there is evidence that severe harm is currently happening. This risk, if realised, is likely to result in substantial liability. **Urgent investigation and remediation are required for the site in its existing state and for development.**
High Risk	Harm is likely to arise. Realisation of the risk is likely to present a significant liability. **Urgent investigation is required and remedial works may be necessary in the short term and are likely over the long term. Remediation will probably be required for development.**
Moderate Risk	There is a possibility that harm is likely to arise. However, it is either relatively unlikely that any such harm would be severe or if any harm were to occur it is more likely that the harm would be relatively mild. **Investigation is typically required to clarify the risk and to determine the potential liability. Some remedial works may be required in the longer-term.**
Low Risk	It is possible that harm could arise, but it is likely that this harm, if realised, would at worst normally be mild. **Investigation is not normally required but could be useful to confirm a preliminary assessment. Remedial works are unlikely to be required or will be limited.**
Very Low Risk	There is a low possibility that harm could arise. In the event of such harm being realised it is not likely to be severe. **No further action recommended.**

Annex D – Preliminary Contaminant Potential Pollutant Linkage Risk Table

Potential Pollutant Linkages:
Qualitative Risk Assessment Table

Item No.	Area/ Building	Potential Pollutant (Source)	Potential Receptor	Potential Pathway to Receptor	Associated Hazard	Potential Consequence of S-R Link	Likelihood of S-R Linkage	Significance: Risk Classification	Comment
1	: h stor ca and current s te uses, most notab y poss b e agr cu tura uses (nc ud ng poss b e s udge spread ng and fert ser storage and spread ng), ground work ngs, unspec f ed tanks. Made ground was not nd cated to be present n the records rev ewed, however there s potent a for t to be encountered n areas c ose to farm bu d ngs, oca sed nfrastructure deve opment (e.g. bases of overhead power nes) and backf ed h stor c surface excavat ons. The potent a for made ground of some types to generate hazardous ground gases.	agrochem ca s, fue o s, heavy meta s, asbestos conta n ng mater a s, pest c des, po yaromat c hydrocarbons (PAH) and hazardous ground gases (carbon d ox de and methane)	Human-hea th (redeve opment workers/serv ces)	Derma Contact Ingest on Inha at on	Tox c	Med um	Un ke y	Low	There s a ow ke hood for s gn f cant contam nat on at surface assoc ated w th agr cu tura sources to be present. If contam nat on assoc ated w th Made Ground s present beneath the s te, t s ke y to be very oca sed - s gn f cant eve s of contam nat on are therefore not ant c pated. Wh st the r sk to construct on workers has been assessed as ow, th s s based on the assumpt on that a construct on management and hea th and safety p an w be produced pr or to commmencement of works The above-ment oned documentat on w cover the requ rement for construct on workers to use job spec fc Persona Protect ve Equ pment (PPE) dur ng the construct on works. Construct on act v t es may create dust on and off s te, wh ch, f contam nated, cou d adverse y affect operat ves, end users and ne ghbours. Dust m t gat on measures dur ng construct on act vt es shou d be mp emented. A D scovery Strategy protoco sha be nc uded n construct on phase env ronmenta management p an to ensure that contam nat on dent f ed dur ng construct on s assessed by a spec a st n and contam nat on. Th s w nc ude but not be m ted to stopp ng works n the area and ensur ng the dent f ed contam nat on does not pose a r sk unt an env ronmenta spec a st undertakes an assessment and a method s agreed to dea w th the dent f ed contam nat on.
2			Human-hea th (future users - ma ntenance workers)	Derma Contact Ingest on Inha at on	Tox c	Med um	Un ke y	Low	There s a ow ke hood for s gn f cant contam nat on at surface assoc ated w th agr cu tura sources to be present. If contam nat on assoc ated w th Made Ground s present beneath the s te, t s ke y to be very oca sed - s gn f cant eve s of contam nat on are therefore not ant c pated. The potent a for d rect contact w th so s cons dered to be ow for the nature of the proposed deve opment. S gn f cant contam nat on from these sources s cons dered un ke y.
4		agrochem ca s, fue o s, heavy meta s, pest c des, po yaromat c hydrocarbons (PAH) and hazardous ground gases (carbon d ox de and methane)	Groundwater (Pr nc pa Aqu fer - Bedrock; Secondary A Aqu fer - Superf c a)	Leach ng M grat on	Water po ut on	Med um	Un ke y	Low	A though contam nat on from agr cu tura sources cou d ex st n groundwater, t s cons dered un ke y that th s wou d be present n suff c ent quant t es to s gn fcant y affect the groundwater receptors.
5			Surface Water features (Str ngs de Stream and O d Carr Stream)	Leach ng M grat on	Water po ut on	Med um	Un ke y	Low	A though contam nat on from agr cu tura sources cou d ex st n surface waters, t s cons dered un ke y that th s wou d be present n suff c ent quant t es to s gn fcant y affect the surface water receptors.
6			Human-hea th (redeve opment workers/serv ces)	M grat on Accumu at on		Severe	Un ke y	Low	The r sk of a severe mpact from ground gas accumu at on s cons dered ow. Th s assessment s based on the nature of the deve opment and the ow probab ty of the made ground conta n ng s gn f cant gas-generat ng mater a s.
7			Human-hea th (future users - ma ntenance workers)			Severe	Un ke y	Low	
8	h stor ca and current off-s te uses, most notab y agr cu tura and and farm bu d ngs, unspec f ed tanks, and unspec f ed p ts and ground work ngs around the S te.	Poss b e contam nants to nc ude – agrochem ca s, pest c des, heavy meta s, fue o s and hazardous ground gases (carbon d ox de and methane).	Human-hea th (deve opment workers/serv ces)	M grat on Accumu at on	Tox c	Severe	Un ke y	Low	The r sk of a severe mpact from ground gas accumu at on s cons dered ow. Th s assessment s based on the nature of the deve opment and the ow probab ty of the made ground conta n ng s gn f cant gas-generat ng mater a s.
9		Hazardous ground gases	Human-hea th (future users - ma ntenance workers)	M grat on Accumu at on	Tox c	Severe	Un ke y	Low	

Annex E – UXO Pre Desk Study Assessment for old RAF Barton Bendish (North of Parcel 1)

PA027838 — LONGMARSH SOLAR FARM (EASTMOOR)

DOCUMENT DETAILS

Site name:	Longmarsh Solar Farm (Eastmoor)		
Reference:	PA027838	**Client:**	Turnkey Regeneration
Date:	19th June 2026	**Contact:**	Jason Webb

RECOMMENDATION

A detailed desk study is recommended to assess, and potentially zone, the Unexploded Ordnance (UXO) hazard level on the Site.

SUMMARY OF FINDINGS

Military Activity	During WWII, RAF Barton Bendish was established in the vicinity of the Site as a satellite station of RAF Marham. In 1942, the airfield was closed. Several anti-invasion defences, including pillboxes, were established at RAF Barton Bendish, approximately 0.4km north of the Site. Several aircraft crashed on and near RAF Barton Bendish, in the vicinity of the Site.
WWI Bombing	Potential targets within approximately 5km of the Site: ▪ Transport infrastructure and public utilities. ▪ Engineering works. ▪ Royal Flying Corps (RFC) Marham. ▪ Military establishments. No readily available records have been found indicating that the Site was bombed.
WWII Bombing	The Site was located in Downham Rural District (RD), which officially recorded 656No. High Explosive (HE) bombs, with a density of 5.3 bombs per 405 hectares (ha). These statistics typically exclude bombs that fell on military establishments, such as RAF Barton Bendish. Potential targets within approximately 5km of the Site: ▪ Transport infrastructure and public utilities. ▪ Engineering works. ▪ Royal Air Force (RAF) Barton Bendish and RAF Marham. ▪ Military establishments. ▪ Anti-invasion defences. No readily available records have been found indicating that the Site was bombed.
Bombing Decoys	None identified within 5km of the Site.

FURTHER INFORMATION

These findings are based on a cursory review of readily available records; caution is advised if you plan to action work based on this PDSA.

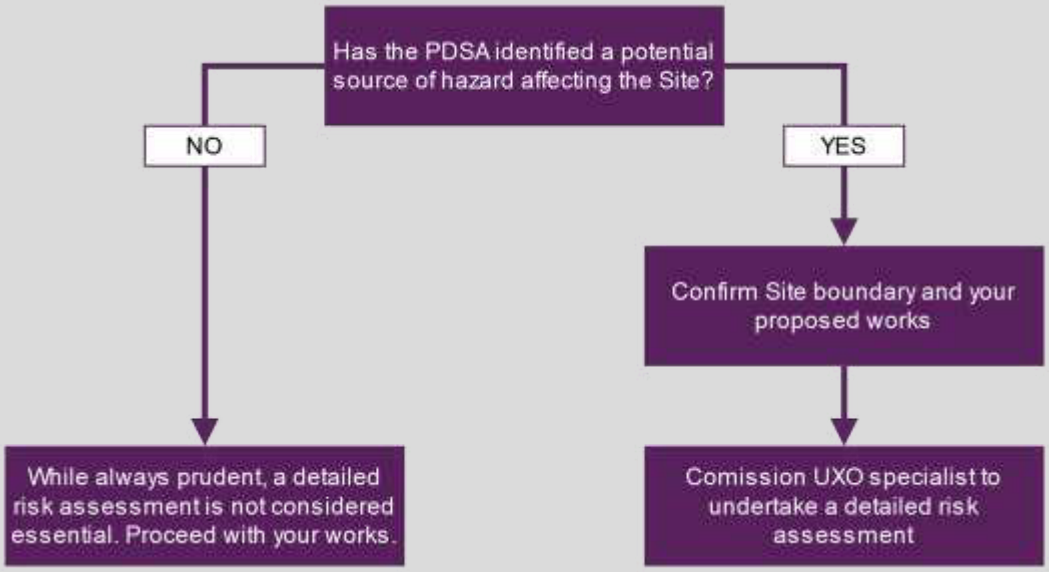
Where a potentially significant UXO hazard source has been identified on the Site, no further research has been undertaken. A detailed UXO desk study and risk assessment may identify other potential UXO hazard sources on the Site.

Visit www.zeticauxo.com to learn more about Zetica's detailed UXO desk studies and other UXO services. Click here for more information about the most common UXO hazard sources in the UK.

If you have any further queries, please don't hesitate to contact us at uxo@zetica.com or 01993 886 682.

NEXT STEPS

Follow the steps below to determine the appropriate course of action:



Potential UXO hazard identified? If the PDSA has identified a potential source of UXO hazard affecting your site, then a detailed UXO risk assessment is recommended.

No obvious source of UXO hazard? If the PDSA has not identified any obvious source of potential UXO, works can proceed.

It is good practice to raise awareness of the background UXO risk in the UK as part of a standard site induction. This will ensure that appropriate action is taken in the unlikely event that UXO is discovered.

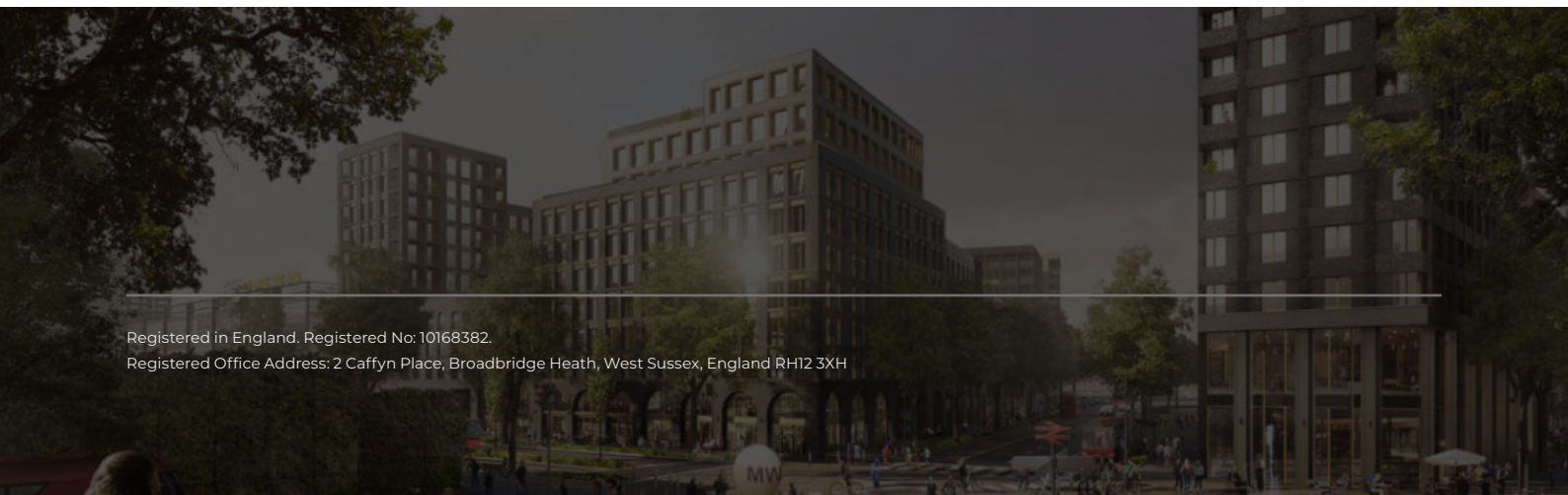
Don't skip a stage: If you skip the detailed risk assessment stage, you could end up undertaking unnecessary work (e.g. trying to detect a UXO hazard that has already been removed).

Similarly, a detailed risk assessment might find that the UXO hazard is worse than expected and has a greater potential to cause harm, requiring a different mitigation approach than would otherwise be undertaken.

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