Suffolk County Council

REDMERE ONSHORE WIND FARM

EN0110042

Scoping Consultation Response

Suffolk County Council

29 October 2026

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Glossary of Acronyms

AIL	*Abnormal Indivisible Load*
BESS	*Battery Energy Storage System*
CEMP	*Construction Environment Management Plan*
CTMP	*Construction Traffic Management Plan*
DCO	*Development Consent Order*
EIA	*Environmental Impact Assessment*
ES	*Environmental Statement*
ESDAL	*Electronic Service Delivery for Abnormal Loads*
HE	*Historic England*
HER	*Historic Environment Record*
HGV	*Heavy Goods Vehicle*
HRA	*Habitats Regulations Assessment*
LEMP	*Landscape and Ecology Management Plan*
LHA	*Local Highway Authority*
LLFA	*Lead Local Flood Authority*
LNRS	*Local Nature Recovery Strategy*

MW	*Megawatt*
NSIP	*Nationally Significant Infrastructure Project*
OHIC	*Office for Health Improvement and Disparities*
PINS	*Planning Inspectorate*
PROW	*Public Rights of Way*
REAC	*Register of Environmental Actions and Commitments*
RSPB	*Royal Society for the Protection of Birds*
SBIS	*Suffolk Biodiversity Information Service*
SCCAS	*Suffolk County Council Archaeological Service*
SLCA	*Suffolk Landscape Character Assessment*
SMP	*Soil Management Plan*
SPA	*Special Protection Area*
STGO	*Special Types General Order*
TCPA	*Town and Country Planning Act*
TRO	*Traffic Regulation Order*
VRRP	*Vegetation Retention and Removal Plan*

"The Council" / "SCC" refers to Suffolk County Council.

Purpose of this Document

The document has been prepared by Suffolk County Council to respond to the Planning Inspectorate's ("**PINS**") Environmental Impact Assessment ("**EIA**") Scoping Consultation for Redmere Onshore Wind Farm occurring between 1 and 29 October 2026.

1 Introduction

1.1 The Proposed Development is a Nationally Significant Infrastructure Project ("**NSIP**"), as defined in the Planning Act 2008 (as amended), named Redmere (Onshore) Wind Farm and promoted by Vattenfall Wind Power Ltd.

1.2 The Planning Inspectorate states that the Proposed Development is to build *"an onshore wind farm comprising of up to 32 wind turbines (with a height of 220m to blade tip), electrical infrastructure including an on-site substation, transformers, switchgear, buried cabling and a Battery Energy Storage System ("**BESS**"), together with site access and highway works, temporary construction infrastructure, and landscaping, habitat management and biodiversity enhancement. The proposed development is anticipated to have an installed generating capacity of approximately 303MW. The grid connection will not form part of the Development Consent Order ("**DCO**") application."*

1.3 The Proposed Development will directly affect the following County Electoral Divisions in Suffolk:

i. Row Heath

ii. Mildenhall

iii. Brandon

1.4 Therefore, Suffolk County Council ("**SCC**") maintains an interest as a Host Local Authority for the Proposed Development. SCC responses may therefore include a wide range of expertise, including matters related to: the Suffolk County Council Archaeological Service ("**SCCAS**"), Ecology, Economic Development and Tourism, Landscape, the Lead Local Flood Authority ("**LLFA**"), the Local Education Authority, the Local Highway Authority ("**LHA**"), Local Minerals and Waste Planning Authority, Public Health, Public Rights of Way and Other Green Access, Socio-economics and Skills.

1.5 SCC's position on the merits of the Proposed Development will be informed by Suffolk County Council's Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy (2026) and its subsequent revisions.[1]

2 General Comments

2.1 SCC finds concern that the point of connection is not intended to be presented to form part of the Proposed Development when submitted. Although the Council does note that the Applicant has outlined that Burwell Main Substation has been identified as the grid connection location. The Council's

[1] https://www.suffolk.gov.uk/asset-library/scc-energy-water-commercial-transport-and-adaptive-infrastructure-policy-240226-final.pdf

position is that the generating station and point of connection are functionally interdependent and therefore should be considered as one project for the purposes of a robust examination of the Proposed Development. Whilst the Applicant's approach is acceptable in planning terms, communities and local authorities should be given the opportunity to scrutinise the impact of the totality of the Proposed Development during the extent of the NSIP process. Communities should be provided with certainty whether the point of connection will be offered as an overhead line or underground cabling system, and the route corridor options should further be presented.

2.2 With regard to Battery Energy Storage Systems, the Council understands that the Applicant proposes a capacity of up to 50 megawatts ("**MW**"). This is despite the generating capacity of the Proposed Development totalling approximately 126MW. In its experience, SCC has rarely seen NSIP developments proposing co-located BESS with a significantly lower capacity than its intended generating capacity. The Council has does recognise that the Scheme may wish to 'overplant' for generating capacity relative to BESS capacity, as occurs on solar schemes, however this disparity goes beyond that understanding. Therefore, the Council has raised concerns with the Applicant that the Scheme may wish to increase the BESS capacity in subsequent stages the design of the Proposed Development. The Council holds the position that the public should be provided with a full understanding of the BESS element of the Scheme, including the reason for the disparity in generating and BESS capacity. Further, the Applicant has yet to define its intended technology or cell chemistry. The Council awaits detail on these matters, including matters expected to be covered in the Battery Fire Safety Management Plan.

2.3 The Council would expect that any impacts of the Proposed Development should follow the Mitigation Hierarchy, as defined in the glossary of National Policy Statement EN-1,[2] as the process to first Avoid, then Reduce, then Mitigate, and then Compensate significant harm to the environment and biodiversity.

2.4 The Proposed Development must fully consider the cumulative impacts. This should include assessment of inter-project and intra-project cumulative effects. Should the point of connection be promoted as a separate, though interdependent, application then cumulative effects of the construction and operation of that element must be considered in the assessment. Further, SCC would recommend early engagement with emerging NSIPs in the locality, such as further onshore wind projects, in addition to the consideration of known proposed NSIPs such as Sunnica Energy Farm and Chatteris Onshore Wind

[2] https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1-2025/overarching-national-policy-statement-for-energy-en-1-2025-accessible-webpage

Farm (also promoted by the Promoter). This should also include any Town and Country Planning Act 1990 ("**TCPA**") applications, emerging or consented, and if any TCPA or NSIP applications are known prior to submission then the assessment should be updated to reflect these.

2.5 The Council has concerns regarding the proximity of the Proposed Development to RAF Mildenhall and RAF Lakenheath. Further to the commitments made in the Commitments Register with regard to Aviation matters (AVI-01 to AVI-04), the Council would expect these matters to be finalised prior to the determination of the DCO and discussed during the Examination.

2.6 The draft Order Limits for Redmere Onshore Wind Farm interact with Anglian Water's Bexwell to Bury St Edmunds[3] (71km) water pipeline, passing directly through the centre of the southern site and to the west of the northern site. Whilst this scheme was submitted to, and approved by, the relevant District or Borough Councils as separate TCPA applications, this represents a significant strategic water main pipeline. The pipeline is built out and finalising land restoration activities. As a result of this development, the ground conditions will therefore be affected. The Applicant should therefore consider for the potential impact that construction activities will have on waterlogged ground and that de-watering might change the support for the pipeline. SCC therefore proposes that Vattenfall discusses this matter with Anglian Water as an urgent priority.

[3] https://www.anglianwater.co.uk/environment/investing-in-the-future-of-water/strategic-pipeline-alliance/keeping-taps-flowing-for-future-generations/bexwell-to-bury-st-edmunds-pipeline

Impacts by Service Area

3 Archaeological Service

3.1 The Applicant has proposed that cultural heritage, including below ground archaeological remains, is scoped into the Environmental Statement ("**ES**") for the Development Consent Order ("**DCO**") application. Suffolk County Council Archaeological Service ("**SCCAS**") welcomes this approach.

3.2 However, SCCAS notes with concern that there is no apparent consideration of the fenland landscape and associated geology, in terms of archaeological implications, within the scoping report. These factors significantly influence both the archaeological potential of the site and the suite of evaluation techniques required to assess that potential and the likely impacts of the Proposed Development. They will also have implications for the engineering approaches necessary to construct the scheme and, consequently, the nature and extent of archaeological impacts.

3.3 SCCAS is also concerned that the scoping report has relied upon data extracted from Heritage Gateway to inform this initial assessment. This is a static dataset which is neither appropriate, nor endorsed by SCCAS, for commercial development purposes. The Suffolk dataset has not been updated for several years and excludes a number of sensitive records, and additional datasets, held within the Suffolk Historic Environment Record ("**HER**"). Whilst SCCAS welcome the commitment to consult the County HERs during preparation of the ES, SCCAS strongly recommends early engagement with both the Suffolk HER and SCCAS Planning Advice Team to agree the scope of HER searches and discuss appropriate assessment and evaluation methodologies.

3.4 The scoping report identifies desk-based assessment and walkover survey as the principal archaeological assessment methods but provides only limited very commitment to further evaluation.

3.5 Any desk-based assessment should provide a robust assessment of archaeological potential, as indicated by known archaeological remains, but should also explicitly consider the limitations of the available evidence, including the depth, character and extent of Holocene deposits. The assessment should also incorporate analysis of aerial photography and LiDAR data, and address the use of other techniques, such as geophysical survey, geoarchaeological investigation and trial-trenched evaluation to provide an appropriate level of understanding to properly assess the impacts of the development and inform a suitable mitigation strategy.

3.6 SCCAS recommends that Geophysical survey is considered, and that advice should be sought from a suitably qualified geophysical survey specialist with experience of fenland environments.

3.7 Of particular importance will be a programme of geoarchaeological assessment. This should draw on existing datasets but should be augmented by a programme of new borehole and/or test-pitting investigations, alongside hydrological assessment, to develop a thorough understanding of the sedimentary sequences, the potential for the preservation of organic remains and palaeoenvironmental deposits, and the possible impacts of construction and engineering activities. SCCAS advises early engagement with the Historic England ("**HE**") Regional Science Advisor regarding the scope of these investigations and the assessment of impacts upon heritage assets both within and beyond the red-line boundary. A broader selection of HE guidance should be consulted, including guidance for environmental archaeology and wetland archaeology.

3.8 Trial-trench evaluation will also be required to ground-truth geophysical survey results and assess near-surface archaeological potential for areas that will be affected by construction, enabling works and ecological compensation/BNG measures involving ground disturbance. This is particularly important on areas of slightly higher ground within the fenland landscape, which are often focal points for Neolithic and Bronze-Age activity. However, the Applicant should also be aware of the potential archaeological significance of the full depth of fenland deposits.

3.9 SCCAS emphasises the importance of these investigations in informing the Environmental Impact Assessment ("**EIA**"). The ES should also set out a properly informed proposed strategy for avoiding, minimising and mitigating impacts arising from the development and any associated activities.

Table 8.1

3.10 SCCAS welcomes the proposal to micro-site infrastructure where feasible to avoid of minimise harm to heritage assets. However, the extent, significance and sensitivity of heritage assets cannot be adequately established through desk-based assessment and walk-over survey alone.

3.11 The table fails to identify indirect physical impacts, such as wider changes to the hydrological environment, as a Potential Impact Pathway for buried heritage assets with archaeological interest and palaeoenvironmental deposits. It is essential that detailed consideration of hydrological change, both during and post construction, and the potential impacts of dewatering on

preserved organic deposits, organic and metal artefacts, and palaeoenvironmental remains is included.

3.12 Trial trenching is identified within this table as a mitigation measure. Whilst trial-trenching may contribute to mitigation design, it is primarily an evaluation technique used to characterise archaeological remains and inform an appropriate mitigation strategy.

3.13 SCCAS is pleased to see that combined impacts have been scoped into the assessment.

3.14 Decommissioning has been scoped out. SCCAS considers that decommissioning should remain within the scope, as there can be no certainty at this point in the project that future decommissioning activities will be confined within areas previously impacted by construction, and both direct and indirect impacts may arise. The potential for such activities to extend beyond the original construction footprint is acknowledged within the table and should be fully assessed.

4 Ecology

4.1 SCC welcomes the inclusion and general scope of biodiversity and ecology assessment included within the scoping report. The inclusion of separate chapters for both Biodiversity and Nature Conservation, and Ornithology is expected and welcomed.

4.2 The scoping determination based on the information provided appears valid and the inclusion or exclusion of receptors in both chapters 6 and 7, for further assessment, is tentatively agreed.

4.3 SCC remains concerned that the environmental implications of the grid connection remain largely undefined. Whilst it is acknowledged that the connection infrastructure may be subject to a separate consenting process, it is functionally necessary to enable operation of the Proposed Development. The ES should therefore clearly demonstrate how the environmental implications of the grid connection have been considered, including cumulative and in-combination effects where sufficient information is available. Various elements of the Proposed Development remain insufficiently defined at this stage, including cabling, Battery Energy Storage System ("**BESS**"), borrow pits and associated infrastructure. These elements have the potential to result in significant ecological impacts and, in the absence of detailed design information, a robust and clearly defined worst-case assessment approach will be required. The basis for any worst-case assumptions should be clearly explained and demonstrably reasonable in the context of the known and potential baseline conditions.

4.4 Given the preliminary survey results, within the Ornithology chapter (7.3.11), demonstrating substantial use of the Site and surrounding area by Special Protection Area-associated species, SCC would expect a comprehensive assessment of functionally linked land and connectivity with designated sites, supported by appropriate survey data and population-level analysis as indicated within the proposed methodology.

4.5 In regard to Operation and Maintenance, there is no indication that monitoring will take place at any point in the operational phase to ensure collision mortality of birds would remain not significant. Given the potential for bird populations to alter in terms of number, species and possibly seasonal occurrence throughout the operational phase, monitoring would be expected to inform any requirement for adapted mitigation.

4.6 Assessments to be undertaken prior to decommissioning, again stated as being based on worst-case scenario, will need to incorporate the potential for habitat, animal and bird populations to have altered based on: creation and maturation of any proposed enhancements and mitigation (including BNG); altered status and designation criteria of bird populations and designated sites and changes to these bird populations through natural spatial population alterations e.g. colonisation, recolonisation, climate change impacts etc.

4.7 Whilst the methodology for assessment meets standard requirements, SCC would like to ensure that the Applicant will also incorporate within their impact assessment, the implications of the recommendations arising from the Third Network Review of Special Protection Areas ("**SPA**") (Phase 2) in their assessment and the subsequent additions to the SPA areas and qualifying interests within the zone of influence of the Proposed Development, including, as per Royal Society for the Protection of Birds ("**RSPB**") informal comments:

4.8 Lakenheath Fen: Classification as a new SPA site for both breeding and non-breeding crane. The SPA review also considers 18 new sites for breeding bittern and 6 new sites for non-breeding bittern. Given that Lakenheath currently supports 5.5% of the booming male bitterns it is highly likely that Lakenheath Fen is one of those un-named sites.

4.9 Nene Washes SPA: The addition of breeding Bittern, non-breeding Whooper Swan, breeding and non-breeding Common Crane and breeding Redshank as features of the Nene Washes SPA, and boundary extensions to this site for Cranes.

4.10 Breckland SPA: The addition of breeding and non-breeding Kingfisher as features, and boundary extensions to the SPA for breeding Nightjar and breeding Woodlark.

4.11 Ouse Washes SPA: The addition of breeding Cormorant, breeding Avocet and breeding Redshank to the SPA, and extension of the boundaries for non-breeding Hen Harrier, breeding Avocet and breeding Redshank.

4.12 Any failure to consider this information within the impact assessment and Habitats Regulations Assessment ("**HRA**") for the proposals could certainly result in inaccurate outcomes of both the overall impact assessment and any HRA.

4.13 SCC have also been contacted by [redacted] of the Iceland Whooper Swan Study who is undertaking detailed research into use of parts of the Proposed Development site and the wider area by SPA qualifying populations, specifically Whooper Swans.

4.14 They have informed us that they have noteworthy research which could significantly inform the understanding of the use of the site by local populations of Whooper Swans. [redacted] has stated in correspondence that they have contacted the Applicant to make them aware of the data collected through the research. SCC would expect this data to be assessed in detail and used wherever relevant in the assessment process. Any decisions to not include all or part of these data within the assessment process will need clear explanation and justification.

4.15 SCC notes that significant elements of both the ecological and ornithological survey effort remain incomplete. Consequently, a number of receptors have been 'scoped in' primarily due to current uncertainty. The ES should clearly demonstrate how completed survey datasets have informed the final scope of assessment and should justify any subsequent scoping decisions based on robust evidence.

4.16 Whilst the use of NatureScot Guidance to inform methodology and assessment remains standard for the UK, given the unprecedented nature of the proposals in terms of size and number of turbines in this particular geographic area, topographical landscape and species assemblages throughout the year, SCC would expect to see a significant literature review in regard to survey effort. Including methodology and outcomes from a variety of sources of potential relevance such as: Fijn, R.C., Krijgsveld, K.L., Tijsen, W., Prinsen, H.A.M. & Dirksen, S. (2012). *Habitat Use, Disturbance and Collision Risks for Bewick's Swans Cygnus columbianus bewickii Wintering Near a Wind Farm in the Netherlands*. Wildfowl, 62, 97-116. and Altenburg & Wymenga. *Windfarms and birds in the Eemshaven, Dutch Wadden Sea*. Research programme investigating collision risk, migration behaviour, bird movements and turbine curtailment in the Eemshaven area etc.

4.17 SCC would like to ensure that all possible mitigation methods are considered wherever required including, in regard to collision risk and possibly impacts of

Barotrauma, curtailment of turbines and painting of blades and/or towers. It is SCC's understanding that the Promoter has dismissed the concept of painting the blades, however, this was included in a list of potential mitigations during the in-person consultation events. This mitigation should therefore continue to be explored.

4.18 SCC notes that the Site is located within an area containing substantial peat deposits and associated water-dependent habitats. The ES should clearly quantify any peat loss, disturbance or hydrological impacts arising from turbines, access tracks, cabling, borrow pits and associated infrastructure, and demonstrate how the iterative design process has sought to avoid and minimise impacts to peat soils and their associated carbon stores wherever possible.

4.19 The scoping document does not provide any information on a likely BNG strategy for the Proposed Development. Limitations of knowledge through lack of detailed design notwithstanding, given the scale of land-take and the extent of agricultural land within the Site, SCC would welcome early confirmation of the BNG delivery strategy, including likely habitat creation proposals, anticipated habitat condition targets, and opportunities to contribute to the Local Nature Recovery Strategy ("**LNRS**")[4] priorities and Associated Biodiversity Areas in order to help demonstrate an achievable and satisfactory BNG outcome is likely.

4.20 SCC welcomes the commitment to undertake a cumulative effects assessment. However, the Scoping Report provides limited detail regarding the developments and infrastructure that will be included within the cumulative assessment, particularly in relation to other renewable energy projects, energy storage facilities, transmission and grid connection infrastructure, and associated habitat change across the wider area. SCC expects the Environmental Statement to clearly justify the cumulative assessment scope and to robustly assess potential cumulative and in-combination effects on ecological and ornithological receptors, including functionally linked land and populations associated with nationally and internationally designated sites.

5 Landscape

The Proposed Scheme

5.1 SCC considers that the information provided by the Applicant is rudimentary, even for the Scoping stage, and therefore encourages the Applicant to engage

[4] https://www.suffolk.gov.uk/planning-waste-and-environment/lnrs/suffolks-lnrs

with the Local Authorities and other relevant stakeholders to improve clarity at the earliest opportunity.

5.2 Figure 2.2 Site Layout shows the DCO limits and indicative turbine locations. However, no information is provided for any of the other elements of the scheme, such as construction compounds and concrete batching plant, the Battery Energy Storage System ("**BESS**"), the proposed on-site substation and associated compound, SuDS, to name but a few.

5.3 It is of great concern that the point of connection to the National Grid, which is integral to the functionality of the scheme, is not part of this application. The connection is proposed at Burwell Substation, which is over 15km to the south-west of the Site of the Proposed Development. No information has been offered on how (overhead or underground) the point of connection would be achieved or via which potential routes this connection would be achieved. The outline design principles at paragraph 2.3.8 are vague and non-committal and offer no re-assurance. SCC considers that the grid connection needs to be scoped into this scheme.

5.4 It is noted Table 2.1 Indicative Design Parameters, states that landscaping and planting would be designed so as not to impede site security. SCC would welcome if the design parameters would include considerations on how appropriate planting schemes would help to integrate and embed those elements of the scheme that might be mitigable.

5.5 With regards to decommissioning, SCC appreciates that the detail will need to be agreed nearer the time. However, certain parameters should be detailed during the Examination and secured within the DCO, to be discharged as a Requirement, such as principles regarding foundation and cable removal and reinstatement of land to former versus any agreed use.

5.6 SCC is concerned that because of the size of the turbines that the landscape and visual effects resulting from this scheme would be of an unprecedented scale and geographical extent in England. Wind turbines of this height have thus far been largely limited to offshore developments. This onshore scheme has the potential to be perceived not as a development within the landscape, but one that transforms and dominates the landscape and transforms it from a predominantly rural/agricultural into an energy landscape, which would visually reach far beyond the Fens it is located in.

Data Sources and Baseline Assessments

5.7 SCC considers that it is acceptable to use the Landscape Character Typology for the East of England as the framework of the landscape assessment, as the scheme straddles three counties. However, more local landscape character

assessments should also be referred to as far as available. This should include the guidance within the Suffolk Landscape Character Assessment (**"SLCA**").

5.8 Where historic landscape characterisation is available, it should also be referred to. It should be noted that the historic evolution of the Fens is complex, as different areas were drained at different times and have different historic backgrounds. It is therefore important, given the geographical extent of the Scheme, to understand the varied development within different parts of the Proposed Development.

5.9 The Suffolk Local Nature Recovery Strategy ("**LNRS**") needs to be included in the data source documents.

5.10 SCC would further point the Applicant to the Suffolk Biodiversity Information Service ("**SBIS**")[5], for example for, but not limited to, information on trees, hedgerows and other vegetation cover.

5.11 The Applicant should also be aware of the Revised Ancient Woodland Inventory.

5.12 In addition, mitigation and landscape restoration proposals should also refer to historic maps.

Tree and Hedgerow Surveys

5.13 It is noted that trees and woodlands are dealt with under Forestry within Chapter 17 Other Environmental Topics. Except for Ancient Woodland, which is to be dealt with in the Biodiversity and Nature Conservation chapter of the ES. SCC considers that this approach is unhelpful as it will be fragmenting the information regarding trees and woodlands and will make it more difficult to understand the totality of impacts.

5.14 For the assessment of Landscape and Visual Amenity effects, a clear understanding of the impacts on vegetation resulting from the scheme is integral. SCC therefore requests that a Detailed Arboricultural Impact Assessment is carried out, including detailed tree and hedgerow surveys in accordance with BS 5837:2012 Trees in relation to design, demolition and construction (UKHab surveys are not considered sufficient). With regards to hedgerows, it will also need to be ascertained whether any would need to be considered as Important Hedgerows under the Hedgerow Regulations 1997.

5.15 In a landscape as sparsely vegetated as the Fens, SCC has the expectation that the Applicant will avoid the loss of any woodland and veteran/ancient trees. The loss of mature trees and Important Hedgerows should also be

[5] https://suffolkbis.org.uk/

avoided wherever possible, and this should be demonstrated by the Applicant and anchored in to the Commitments Register.

5.16 Any vegetation losses that cannot be avoided will need to be fully recorded, including photographic evidence prior to removal, and exact quantifications in schedules as well as spatial identification of drawings of a suitably fine-grained scale.

5.17 SCC would be happy to engage further with the Applicant in this matter.

Design Principles

5.18 SCC welcomes the inclusion of the design principle to minimise effects on landscape character, visual amenity and valued views through careful siting and layout design (section 4.4).

Rochdale Envelope

5.19 Given that the Rochdale Envelope assumes a reasonable worst-case scenario for assessment purposes, SCC would welcome a commitment by the Applicant to reduce landscape and visual amenity impacts and effects during the detailed design phase, effectively pulling back from the reasonable worst-case scenario.

5.20 With regards to flexibility, suitable flexibility should be built into the DCO to avoid the loss vegetation and enable micro-siting to reduce impacts on vegetation post consent. In SCC's experience, the DCO boundary is often drawn without consideration of vegetation impacts; when the boundary is very tight there is then no room for manoeuvre to save vegetation. Whilst not standard practice, SCC promotes that there should be greater flexibility so that if the landowner and the Local Planning Authority agree to avoid landscape features then the DCO boundary should be able to accommodate this. Therefore, the DCO red line boundary should provide sufficient scope for such flexibility.

Proposed Scope for Landscape and Visual Matters

5.21 SCC considers that Construction Phase impacts and effects need to be fully assessed and not scoped out. Not only will there be more movement and noise from construction activities, it is also likely that during winter working there would be additional construction lighting. It is therefore unreasonable to scope this out.

5.22 SCC considers that Operation Phase impacts and effects need to be fully assessed and not scoped out, including for landscape character beyond 10km.

5.23 SCC considers that Decommissioning Phase impacts and effects need to be assessed to a reasonable extent and as far as possible at this stage.

Decommissioning could have adverse effects greater than that of the operational phase and could, for example, affect successful mitigation planting.

Approach to Mitigation

5.24 The mitigation hierarchy presented in Plate 5.1 differs slightly from the usual Avoid - Minimise - Mitigate/Restore - Compensate; however, SCC welcomes the commitment by the Applicant that any remaining unmitigated or residual impacts should be offset and compensated for.

5.25 SCC considers that, given the scale and the nature of the scheme, compensation in form of landscape-scale landscape restoration proposals and community benefits will be essential.

5.26 However, where possible, any planting removed to enable construction will need to be reinstated. It should be noted that, should this reinstatement planting form part of the BNG calculation, its success will affect the BNG outcome. SCC therefore recommends either applying BNG calculations that do not rely on the success of reinstatement planting or allowing adequate and dynamic establishment and aftercare periods for reinstatement planting (well beyond five years), before handing back to landowners. SCC would welcome further engagement with the Applicant in this matter.

5.27 SCC welcomes the staging of mitigation measures and residual effects assessments as outlined in paragraph 5.3.18.

Additional Considerations

5.28 At least one of the additional areas of land (in Great Yarmouth) is well vegetated. It will need to be considered which measures would be least harmful to the existing vegetation, for example coppicing rather than removal, to accommodate over-sailing. SCC advises engagement with the Norfolk LNRS on this matter.[6]

LVIA Methodology

5.29 SCC broadly agrees with the methodology for the LVIA as presented in Redmere Wind Farm EIA Scoping Report - Appendix C: EIA Methodologies, September 2026, except for the following points:

General comments

5.30 The bullet points in tables should not be linked by 'and', as this might be interpreted that both points need to be fulfilled; either there should be no linking word or 'and/or'.

[6] https://www.norfolk.gov.uk/article/39010/What-a-Local-Nature-Recovery-Strategy-is

Landscape assessment

5.31 SCC does not agree with Table 5.7 Definitions of Value attached to Views.

5.32 The absence of evidence of value does not equate with the evidence of absence of value. Views, which are valued by local visual receptors should not be placed in the 'low value' category. This should be reserved for views with considerable detracting features.

5.33 The duration of effects should also define at what point a development would be considered permanent.

5.34 SCC considers that the Applicant will need to define the local character of the affected areas, how well they represent their landscape type and how this will be affected by the development.

Visual assessment

5.35 SCC considers that the standard assessment for visual effects during winter (as proposed in paragraph 5.3.12) is insufficient for the Proposed Development.

5.36 At 220m to tip height, the turbines for Redmere are taller than any other onshore turbines in England to date. This size of windfarms has been reached (and surpassed) almost only by offshore windfarms. The proposals therefore are in uncharted territory in England, and it must be expected that for proposals of this scale, the visual impacts will be so far reaching that they will be influenced by the viewing direction in combination with the prevailing weather conditions and the visual acuity of viewer/visual receptor, and even the curvature of the earth.

5.37 It is expected that the assessment of visual effects for onshore windfarms of this scale will be more complex than for offshore windfarms, as there are 360° views of the development.

5.38 SCC considers that these aspects will need to be fully considered in the ES, in particular with regards to heritage assets, designated landscapes, and promoted recreational Public Rights of Way ("**PROW**") routes.

5.39 It will therefore be necessary to assess the visual effects in different seasons and weather conditions.

5.40 SCC welcomes that any effects of moderate or greater significance will be considered significant. To this should be added that effects that would fall just under the significance threshold (i.e. minor-moderate effects) would be closely assessed in the narrative to establish whether they may need to also be considered significant.

5.41 It should further be noted that SCC considers that an accumulation of non-significant effects can in their accumulation result in significance. Given the nature of this development, this result is highly likely.

5.42 SCC considers that night-time effects of the scheme need to be fully assessed (not only in regard to aviation lighting) and notes that the wind turbines are proposed in an area with the lowest light pollution categories as a baseline (see Scoping Figure 9.5 Night Blight).

5.43 SCC considers that sequential and intra-cumulative effects on PROW, and in particular from promoted routes need to be fully assessed (see Scoping Figures 9.12 and 9.13, Appendix A Part 2).

5.44 When combining various receptor groups for any given viewpoint (as suggested in Table 9.2 of the Landscape and Visual ES Chapter), SCC expects that the highest-rating receptor group in terms of susceptibility and resulting sensitivity will be used to assess the significance of the effect.

Cumulative effects

5.45 Further clarification is required with regards to the assessment of cumulative effects. It is unclear, whether all coinciding development will be considered or whether it is proposed to only consider other windfarms, which would not be acceptable.

5.46 In the LVIA Methodology, there is no mention of, or explanation on, how intra-cumulative effects will be assessed. With regards to the definition of intra-project effects in Scoping Chapter 18, SCC disagrees that such effects would need to be effects from more than one topic area. Intra-project effects could also arise from seeing, for example, more than one array in the same view (with or without turning the head) or in sequential views.

5.47 It should also be noted that effects on other consented but not yet built residential areas will need to be assessed.

5.48 SCC considers that the susceptibility and the value of the landscape may change when considering cumulative effects with other developments. In particular, the susceptibility, i.e. the ability of the landscape to accommodate the Proposed Development without suffering undue harm could change, if there are several similar other schemes in the area.

5.49 SCC considers that the cumulative assessment should also reflect on the effect the layout and resulting pattern of wind turbines in the landscape.

Visualisations

5.50 SCC considers that the proposed 27 viewpoints are insufficient to adequately assess the visual effects of the scheme.

5.51 To give some examples for views within Suffolk, SCC considers that there should be at least additional viewpoint in the following locations:

i. Lark Bank, a raised recreational route along the River Lark, where views of the Suffolk array in close proximity together with the Norfolk and Cambridgeshire arrays (slightly further away) will need to be assessed (intra-cumulative effects).

ii. Towards the southern end of the Suffolk array from Burnt Fen Turnpike, looking east/north-east towards the Suffolk and Cambridgeshire arrays. This should also consider shade flicker and effects on residential visual receptors.

iii. At RSPB Lakenheath Fen, an additional viewpoint is required further west, where views of the Norfolk array would be experienced relatively closely and from where the Cambridgeshire and Suffolk arrays would be expected to also be visible beyond woodlands and other intervening structures (again, intra- cumulative effects will need to be assessed).

5.52 SCC further considers that it should be demonstrated through viewpoints that there would be no significant visual effects from Cambridge, Newmarket and Bury St Edmunds landmarks as well as from other Suffolk settlements and routes, which appear to have been scoped out in Table 9.2 of the ES Chapter Landscape and Visual. It is unclear what is meant by 'lack of clear views'. SCC considers that Table 9.2 requires review and that most identified receptors should be scoped in for representative viewpoint assessment. SCC would welcome further engagement with the Applicant in this matter.

Residential Visual Amenity Assessment (RVAA)

5.53 SCC considers that the Applicant needs to demonstrate that a 2km radius is sufficient as study area, given the scale of the scheme and the height of the turbines. SCC also considers that depending on the evidence provided by the Applicant, there should be flexibility to assess additional properties, should the need arise.

Aviation Lighting Assessment

5.54 It is unclear what baseline assessment is proposed in regard to aviation lighting.

5.55 SCC considers that the aviation lighting will need to be assessed against the existing light pollution/darkness of the night sky and how the required lighting would affect the dark skies of the area. Effects on wildlife and visual receptors will also need to be considered.

5.56 SCC considers that three dusk visualisations will not be sufficient to convey the effects of aviation (and other) lighting across the affected area. A map should be produced modelling the expected light pollution of the affected area resulting from the project.

Proposed approach to assessing implications for landscape designations

5.57 SCC considers that both national and local landscape designations will need to be fully considered. Before any assessments of effects on the National Landscape and its special qualities are scoped out, it would need to be demonstrated that there would be no significant effects.

Approach to Mitigation

5.58 While SCC welcomes the points made in Section 5.10, these appear to be design principles rather than a clear approach to mitigation. It would be welcome if there was a commitment from the Applicant to apply the mitigation hierarchy in full (including compensation) and to set out what is considered embedded mitigation (for example the iterative layout design), standard mitigation and what would be considered further enhancement and compensation.

Control Documents

5.59 SCC advocates for a two-stage approach to control documents, meaning that there should be a suite of outline control documents provided during the Examination, with detailed control documents being developed in accordance with these outline documents post-consent (during the Discharge of Requirements).

5.60 SCC expects that there will be a suite of control documents, including but not limited to a Construction Environmental Management Plan ("**CEMP**") with a Register of Environmental Actions and Commitments ("**REAC**"), Soil Management Plan ("**SMP**"), Landscape and Ecology Management Plan ("**LEMP**") (including appendices), and a Construction Traffic Management Plan ("**CTMP**"), amongst others.

5.61 For Landscape and Visual Matters, the outline LEMP should include, but not be limited to, outlining the responsible parties; a full AIA (including tree protection); Vegetation Retention and Removal Plans ("**VRRP**"); Reinstatement Plans; prescriptions and specifications for reinstatement, aftercare and monitoring. SCC would welcome further engagement with the Applicant on this matter.

Redmere Wind Farm Commitments Register

5.62 While SCC welcomes the two commitments relating to Landscape and Visual matters, regarding the agreement of viewpoints with statutory consultees (LVIA-02) and to use a ZTV to inform the LVIA (LVIA-01), there is a complete lack of commitments with regards to: landscape and visual baseline records; avoidance and minimisation of impacts and effects (application of the mitigation hierarchy) during construction, operation and decommission; reinstatement and landscape and visual mitigation and compensation; implementation; aftercare; monitoring; and long-term management.

5.63 SCC welcomes ECOL-03, the commitment to avoid Ancient Woodland but considers that this should also include veteran and ancient trees. Additional commitments should be included for the protection of Important Hedgerows under the 1997 Hedgerow Regulations.

5.64 ECOL-04 and ECOL-08 are too weak: 'where practicable' should be replaced with 'where possible'.

5.65 ECOL-07: SCC considers that an outline Landscape and Ecology Management Plan will need to be secured within a Requirement in the DCO. This needs to include prescriptions for landscape and visual matters as well as ecological measures.

5.66 Landscape and Visual matters will also need to be considered within and cross-referenced to the CEMP, CTMP, SMP, OEMP, and DEMP.

5.67 ECOL-09: An outline lighting plan and lighting design strategy should be secured during the Examination, and prior to the determination of the DCO.

5.68 SCC considers that an outline Shadow Flicker Protocol should be secured during the Examination, and prior to the determination of the DCO, rather than prior to operation.

Shadow Flicker Methodology

5.69 SCC welcomes the prospect of a Shadow Flicker Protocol and would seek a stronger commitment from the Applicant on this, including clear steps that would be taken, if complaints were received.

5.70 Further clarification is required as to the radius in which shadow flicker is anticipated to occur.

Figures

5.71 SCC welcomes that different scales are used for viewpoint at closer range and those further away. However, SCC considers that the 10km radius viewpoint sheets need to be split up further into manageable and meaningful segments at a more granular scale (such as 1:25,000, with an OS base). While the

overview Figures 9.7 to 9.10 provide is welcome, the scale of the map suggests a coverage with viewpoints that is not experienced in the field.

5.72 Likewise, the scale for Figures 9.11 Residential Properties Within 2km of the Indicative DCO Limits with Turbine Tip ZTV and 10.1 Shadow Flicker Study Area Shadow Flicker should be increased to avoid or reduce the overlap in the depiction of affected properties.

5.73 Figure 9.12 and 9.13 PROW with Turbine Tip ZTV (30km/10km) do not appear to include, or show clearly, all PROW and should therefore be renamed. It is unhelpful to present non-promoted PROW in a grey that is difficult to differentiate from the base map depiction of ditches and drains. Again, the scale is unsuitable to convey the information.

5.74 SCC considers it problematic that the Proposed Development would be located on Best and Most Versatile ("**BMV**") land as shown in Figure 15.3 Provisional Agricultural Land Classification.

5.75 For Figures 18.1a-c Cumulative Developments, it would be helpful if the type of development (housing/minerals and waste/solar/wind) could be identified through colour coding.

6 Lead Local Flood Authority

6.1 The EIA only appears to focus on the flood risk from rivers and does not consider the other flood risk i.e. surface water, reservoir, groundwater and foul. Therefore, a flood risk assessment should be submitted.

6.2 Due to the scale of the Proposed Development, strategies for the disposal of surface water should be developed for each site and type of development. The strategy should be in line with national and local policy/guidance.

7 Local Highway Authority

Grid Connection

7.1 SCC as the Local Highway Authority is concerned that the impacts of the construction of the grid connection in terms of the route and any improvements to existing infrastructure may be excluded from assessment (Scoping 2.4.4). Both generate significant amounts of Heavy Good Vehicles ("**HGV**") and worker vehicles and can involve disruptive road closure and damage to roads through use diversion routes. The scarcity of appropriate roads will result in lengthy diversion routes in this area. Of concern is access to Burwell Substation for large or heavy loads. SCC's understanding is that the is no viable special order movement route in terms of heavy load to Burwell or

north of Mildenhall due to restrictions on national and locally managed structures, nor is a route to Burwell shown in Figure 13.1a.

Data Collection

7.2 Care is advised when professional judgment is used instead of reliance on recently collected data. For a scheme of this significance and geographical scope, data surveys will be needed at specific locations as available data is likely to be scarce or dated. Whilst use of strategic traffic models is helpful on a regional basis, care needs to be taken if used as a proxy for capacity assessment of junctions or links.

Study Area

7.3 The study area is currently only shown as the strategic road network from the port of Great Yarmouth to the site. This should be expanded to include potential routes on the Local Road Network that may be used by construction traffic and workforce.

7.4 The title of Figure 13.1a suggests that the Traffic and Transport study area is restricted to the route between Great Yarmouth and the site via the A10. However, 13.1.3 of the scoping report refers to this as the Abnormal Indivisible Load ("**AIL**") transport route. For clarity, the Applicant should provide or confirm the scope of the Transport study area as presently this would appear to exclude, for example, roads such as the A1101 through Mildenhall. Unless sufficient measures are included within the CTMP to prohibit HGVs and workers using alternative routes, then the Traffic and Transport study area needs to be considerably enlarged.

Assumptions Regarding Construction Traffic

7.5 It is noted that the Applicant is considering use of borrow pits to provide construction material. Figure 11.4 only appears to show a small area of glaciofluvial deposits that could potentially be available for sand and gravel extraction. When HGV estimates are provided, it would also helpful if the assumptions in terms of the sources of aggregates and the possible use of borrow pits for disposal of material are detailed. Until such time as the borrow pit option is demonstrated as deliverable, SCC would assume that import and removal of material is included in HGV estimates as a realistic worst-case scenario. The origin / destination of material may also have a bearing on routing of HGVs.

Construction Traffic

7.6 The scoping report does not contain much information on HGV movements, construction workforce numbers and associated traffic or individual project traffic. Therefore, SCC is limited in providing advice on appropriateness or

otherwise of the local highway network for construction traffic. SCC would like early sight on proposed construction routes, so that officers can offer advice.

7.7 It is reasonable to expect detailed traffic forecasts in order to assess the magnitude of impacts on the highway network, e.g. driver delay, accessibility, road safety and network capacity. Detailed construction traffic forecasts could include:

i. Peak construction flows,
ii. Daily peak vehicle movements,
iii. HGV and Light Goods Vehicle proportions,
iv. Construction phasing,
v. Traffic routing.

7.8 The definition of HGV needs to be clarified. In other NSIPs, HGV has been taken to mean commercial vehicles in excess of 3.5 tonnes.

Abnormal Indivisible Loads

7.9 Reliance should not be placed solely on the Electronic Service Delivery for Abnormal Loads ("**ESDAL**") notification process with regards to AILs as this is binary process, with movements either being accepted or rejected due to the restrictions placed on highway structures including Special Types General Orders ("**STGO**"). Early engagement with the LHAs is necessary to understand such restrictions to enable further assessment if necessary to review the capacity or in the worst-case to repair or replace substandard structures.

7.10 The description in the scoping report (2.1.4) and Figure 13.1a suggests that AILs will route from Great Yarmouth entering the site from the north via Littleport. It is not clear if National Highways, Norfolk County Council and Cambridgeshire County Council have confirmed this route is feasible. The alternative access from the south through Mildenhall with wide or long loads will be a challenge with the evolved, historic nature of the highway network.

7.11 During the operational phase, it is the LHA's opinion that the movement of large loads to main site compounds or substations should be scoped into the assessment. This is to ensure long term resilience of route used by large and heavy loads.

Construction Workforce

7.12 Information on construction workforce is currently very limited. Workforce movements can represent a significant proportion of construction-related traffic and therefore needs to be properly reflected in the traffic forecasts.

7.13 A clear workforce travel strategy supported by evidence-based assumptions will need to be provided. This should include workforce numbers, shift patterns and the proposed measures to manage workforce travel.

7.14 Where timing of shift patterns is offered as embedded mitigation to avoid network peaks, care needs to be taken that the cumulative impact with other nearby projects such as Sunnica Energy Farm do not create a new network peak.

Transport Assessment and a Construction Traffic Management Plan

7.15 A Transport Assessment, Construction Traffic Management Plan and a Construction Worker Travel Plan will need to accompany the formal stakeholder consultation and must adequately consider the impacts of the additional traffic generated by the development, including any AILs. The Local Highway Authority would need to understand the traffic impacts from this development in isolation and cumulatively with other permitted or developing projects in the surrounding area.

7.16 The Transport Assessment should also consider the following in addition to implications of network peak periods:

i. Suitability of access from the highway, especially impacts such as vegetation removal to provide safe visibility. This will require surveys and site visits to provide sufficient detail to identify the consequential impacts.

ii. Collision Data

iii. Junction and Link Capacity

iv. Identification of feasible AIL routes to identify constraints such as weak bridges or road geometry.

7.17 Clarity will be required on the extent to which pre-commencement works can be undertaken, including the provision and use of temporary accesses, enabling works and associated construction traffic movements. Measures to facilitate project delivery should also be identified, including the scope and timing of any required Permanent Traffic Regulation Orders ("**TRO**"), temporary traffic management arrangements, protective provisions and other mechanisms for working collaboratively with the relevant highway authorities. Early engagement will be essential to establish the necessary consents, approvals, access arrangements and working requirements, manage interfaces with the existing highway network, and minimise potential risks to the project programme and delivery.

Management Plans and Control Measures

7.18 There does not appear to be any reference to controls on construction traffic generated by workers. Whilst acknowledging that the limited public transport options in most locations of this project make this challenging, SCC would expect the Applicant to identify practical measures to reduce worker trips by car and promote sustainable travel wherever possible, such as:

i. Car sharing,

ii. Crew minibuses,

iii. Public transport,

iv. Cycling and walking.

7.19 Control measures and management plans must include pre-commencement works within their scope as experience has shown that these can have significant adverse local impacts if not undertaken. Details on the Management Plans and Controls needs to be discussed and agreed with the LHA.

7.20 There is currently no information on working hours, including HGV delivery times. These should be included in the relevant management plans.

7.21 Management plans should clearly state how construction traffic will be monitored and measures to reduce impacts enforced. These should be the responsibility of the undertaker to deliver and not passed to contractors.

Site Access

7.22 The plans show that the site access point lies within the county of Cambridgeshire, however, it is not clear if this is the only site access proposed. Clarification on any potential additional site access points is required.

Existing Baseline

7.23 No details are provided on the extent or location of traffic surveys. This should be agreed with the LHAs prior to undertaking any surveys to avoid extraneous work.

Future Baseline

7.24 The number of proposed schemes in the north of the county makes undertaking future year assessments particularly complex, and so it is recommended that this is agreed with the local authorities at an early stage and may require numerous scenarios to be tested.

7.25 Regarding the Assessment criteria (Appendix C), some flexibility should be shown when applying the ISEP thresholds (9.2.1), noting that traffic surveys are subject to a level of uncertainty.

Relevant Highway Data

7.26 The highway boundary information can be obtained from the highway boundary team at HighwayRecords@suffolkhighways.org. Failure to do so has been found to leave gaps between the land controlled by the Applicant and the highway boundary, challenging delivery of highway works.

7.27 When referencing road numbers and street names, these should be those used in the national street gazetteer.[7]

7.28 SCC has produced Highway guidance on NSIPs for Suffolk.[8] This has not been included in Appendix B.

7.29 The walking and cycling routes do not acknowledge the presence of quiet lanes that, while having no legal protection, do form an important part of the non-motorised network in the county.[9]

7.30 Suffolk also has a thriving network of Roadside Nature Reserves[10]. Care needs to be taken to avoid and protect these during construction works, including avoiding damage by construction traffic using minor roads to access the site.

8 Local Minerals and Waste Planning Authority

Minerals Safeguarding

8.1 Policy MP10 (Minerals consultation and safeguarding areas) of the Suffolk Minerals and Waste Local Plan (July 2020)[11] aims to protect economically important sand and gravel resources from being sterilised by non-mineral development.

8.2 Paragraph 3.5.7 of the Scoping Report identifies Mineral Safeguarding Areas and Consultation Areas under the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036. However, as part of the proposed development falls within Suffolk, reference should also be made to the Suffolk Minerals and Waste Local Plan (July 2020)[11] and its relevant safeguarding policies.

8.3 It is recommended that the Environmental Statement or supporting planning documents identify whether any part of the proposed development within Suffolk falls within a Minerals Consultation Area or Minerals Safeguarding Area. The extent of any overlap should be identified, and where relevant, a

[7] https://www.geoplace.co.uk/addresses-streets/street-data-and-services/national-street-gazetteer
[8] https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information/nsip-information-for-developers-and-project-promoters
[9] https://www.quietlanessuffolk.co.uk/
[10] https://www.suffolk.gov.uk/planning-waste-and-environment/suffolks-countryside-and-wildlife/landscape-and-wildlife/suffolks-roadside-nature-reserves-interactive-map
[11] https://www.suffolk.gov.uk/planning-waste-and-environment/suffolk-minerals-and-waste-plan/adopted-suffolk-minerals-and-waste-local-plan

proportionate Minerals Safeguarding Assessment should be provided, taking into account the five-hectare threshold under Policy MP10.

8.4 Any assessment should consider the extent of safeguarded mineral resources affected and whether the proposed development would prevent or restrict their future extraction. This should take account of the proposed infrastructure, including turbine foundations, access tracks, the substation and associated works, distinguishing between temporary and permanent development where appropriate.

8.5 Where mineral resources could be affected, the assessment should consider whether extraction would be economically viable and practically or environmentally feasible, and whether prior extraction or use of minerals within the development would be possible.

Borrow Pits

8.6 Paragraphs 2.2.28 to 2.2.30 of the Scoping Report identify the potential for borrow pits to provide materials for the construction of access tracks, hardstanding and other infrastructure. Paragraph 11.4.3 confirms that a Borrow Pit Assessment will be undertaken and appended to the Environmental Statement.

8.7 Where borrow pits are proposed within Suffolk for the extraction of sand and gravel, these should be considered against Policy MP3 (Borrow pits) of the Suffolk Minerals and Waste Local Plan (July 2020)[11] and other relevant policies.

8.8 The assessment should include, but not be limited to, details of the proposed location and extent of any borrow pits, the anticipated quantities of material to be extracted, how the material would be used within the development and the proposed restoration arrangements.

Waste Safeguarding

8.9 Policy WP18 (Safeguarding of waste management sites) of the Suffolk Minerals and Waste Local Plan (July 2020)[11] aims to protect existing and permitted waste management facilities from development that could affect their continued operation.

8.10 It is recommended that the Environmental Statement or supporting planning documents identify any safeguarded waste management facilities within or near the proposed development in Suffolk, including the relevant safeguarding zones identified in the Suffolk Minerals and Waste Local Plan (July 2020)[11].

8.11 Where relevant, the assessment should consider whether the Proposed Development could affect the operation of these facilities, either directly or by introducing restrictions on their existing activities. The assessment should

demonstrate that the Proposed Development would not prejudice the continued operation of any affected waste management facilities.

9 Public Health

Health and Wellbeing Assessment

9.1 SCC notes that the Scoping Report proposes in paragraph 17.1.3 to scope out a standalone human health and wellbeing assessment. SCC also notes that the report identifies a range of pathways through which the Proposed Development may affect human health and wellbeing, with these matters proposed to be considered through the relevant topic assessments presented in the ES. This includes those set out in paragraph 17.1.1 of Hydrology, Hydrogeology, Geology and Peat, Traffic and Transport, Noise and Vibration, Climate Change and Greenhouse Gases, socio-economic effects, Tourism, Recreation and Land Use.

9.2 SCC does not object in principle to Human Health and Wellbeing being assessed through relevant specialist topic chapters rather than through a standalone Human Health assessment, provided that this approach can demonstrably deliver a comprehensive and integrated assessment of the relevant health pathways and their interactions. However, SCC consider that the Applicant's approach to Scoping as detailed in the Scoping Report and methodology as set out in Appendix C, do not sufficiently demonstrate how population health, including mental health and wellbeing, health inequalities, vulnerable groups and cumulative health effects will be systematically identified, assessed and reported across the ES. In particular, there is limited explanation of how wider determinants of health, mental wellbeing pathways and distributional effects will be considered, or how findings from individual topic assessments will be integrated to provide an overall understanding of the potential implications for health and wellbeing.

9.3 In line with the Rochdale Envelope principle of a cautious 'worst case' approach, SCC's primary recommendation is that PINS direct the Applicant to scope in Human Health and Wellbeing as a standalone assessment topic.

9.4 If, notwithstanding this recommendation, PINS accepts the Applicant's proposed integrated approach and concludes that Human Health and Wellbeing should be scoped out, SCC recommends that the following matters are addressed within the relevant specialist assessments and brought together within the ES. These matters also indicate important areas of scope that SCC would expect to inform a standalone Human Health and Wellbeing assessment should PINS agree with SCC's primary recommendation.

Integration of Health and Wellbeing Outcomes

9.5 The ES should include a dedicated Health and Wellbeing chapter. This is not intended to circumvent any decision PINS may make to scope out a standalone health and wellbeing assessment from the ES, but rather to provide a clear and integrated account of the relevant findings from the specialist topic assessments and their implications for population health and wellbeing.

9.6 The chapter should be supported by an appropriate health and wellbeing baseline. The baseline should identify potentially vulnerable populations, understand existing health inequalities and support consideration of receptor sensitivity across relevant topic chapters. Appropriate sources include Census data, Office for Health Improvement and Disparities ("**OHID**") profiles, the Indices of Multiple Deprivation, Joint Strategic Needs Assessments from authorities across the study areas, and other locally relevant quantitative and qualitative evidence.

9.7 The chapter should identify where key health and wellbeing pathways have been assessed, summarise the implications for population health, vulnerable groups and health inequalities, and cumulative effects, and detail clearly how health considerations have informed the overall conclusions of the ES.

Mental Health

9.8 A key concern for SCC in relation to the Proposed Development is the potential effect on community mental health and wellbeing. SCC considers that the Scoping Report does not sufficiently identifying and assess the potential effects.

9.9 Alongside the effects identified within the Applicant's proposed topic assessments, there are a range of pathways through which the Proposed Development may affect community mental health and psychological wellbeing which are omitted. These include prolonged uncertainty associated with the Proposed Development and perceived loss of control or influence over changes to the local environment. The Scoping Report and methodology appendix do not clearly identify or propose assessment of these or other potentially relevant pathways, nor explain how any differential effects on people who may be more vulnerable to prolonged uncertainty or environmental change will be identified and reported.

9.10 SCC considers that mental health and psychological wellbeing should be considered comprehensively across the relevant topic assessments. This should include consideration of direct and indirect effects, and interactions between different health determinants, such as the combined effects of construction noise, changes to traffic and movement, and reduced access to green space on stress, sleep, physical activity and mental wellbeing.

9.11 For relevant assessments, the baseline should include quantitative evidence of the mental health and wellbeing characteristics of the affected population, together with qualitative evidence capable of identifying community perceptions, concerns, priorities, existing healthcare service pressures and factors that may influence resilience and wellbeing. The baseline should also identify relevant vulnerable groups and consider the potential for existing pressures to interact with, or increase sensitivity to, the effects of the Proposed Development.

Health Inequalities and Vulnerable Groups

9.12 SCC is committed to the reduction of health inequalities. The Scoping Report includes some brief demographic and socio-economic baseline information in paragraphs 15.3.4-5 and identifies some receptors in table 17.1 that may experience effects arising from the Proposed Development, including local communities, recreational users and sensitive receptors. However, it is not currently clear how differential effects across population groups will be identified, assessed and reported consistently across the ES, or how population vulnerability, demographic characteristics and existing inequalities will inform receptor sensitivity, significance judgements and mitigation measures.

9.13 Assessment of population health should extend beyond consideration of average population effects and should examine whether certain groups are disproportionately exposed to, or less able to adapt to, particular impacts. This is particularly important where effects relate to access, mobility, noise, disruption, transport, recreation, community facilities or cumulative development pressures.

9.14 SCC recommends that the Noise and Vibration, Traffic and Transport, Landscape and Visual, and Socio-economics, Tourism, Recreation and Land Use assessments identify relevant vulnerable groups and consider whether the magnitude, duration or significance of effects differs from that experienced by the wider population. This should include, where relevant, children and young people, older people, disabled people, people with existing physical or mental health conditions, deprived communities, people reliant on public or community transport, and neurodivergent people.

9.15 The ES should explain how population vulnerability and health inequalities have informed receptor sensitivity, significance judgements and mitigation measures within each relevant assessment. It should be clear whether groups experiencing existing disadvantage are likely to experience disproportionately greater adverse effects, reduced access to benefits, or reduced ability to adapt to change.

Access to Services, Facilities and Community Infrastructure

9.16 SCC notes table 13.1, confirming that the Traffic and Transport assessment proposes to consider community severance and effects on access to facilities, services and amenities, and paragraph 15.1.2 bullet point 3, that effects on social infrastructure are proposed to be assessed within the Socio-economics, Tourism, Recreation and Land Use assessment. However, an interpretation of facilities, services, amenities and social infrastructure is not provided and thereby the Scoping Report does not clearly identify whether healthcare facilities, social care services and other health related infrastructure form part of that assessment, nor how effects on access to those services would be identified, assessed and reported.

9.17 SCC recommends that the assessments be informed by baseline evidence relating to existing accessibility of health and care services, including factors such as travel times, public transport availability, levels of car dependency and population groups that may already experience barriers to access. This would assist in establishing receptor sensitivity and determining whether particular communities may be more vulnerable to any changes in accessibility arising from the Proposed Development, particularly through construction and decommissioning from effects of any increased journey times, temporary diversions, community severance, reduced connectivity or altered route availability.

9.18 Where such pathways are identified, the Socio-economics, Tourism, Recreation and Land Use assessment should consider the implications for community wellbeing, use of social infrastructure and access to services, particularly for population groups that may already experience barriers to access.

Physical Activity, Recreation and Access to Open Space

9.19 SCC notes table 15.1, confirming that the Scoping will include assessment of tourism, recreation and Public Rights of Way, including potential effects arising from temporary closures, diversions, restrictions and disruption affecting access to social infrastructure. It is not currently clear however how the implications of these changes for physical activity, access to recreational opportunities and associated health and wellbeing outcomes will be assessed and reported.

9.20 SCC recommends that the Socio-economics, Tourism, Recreation and Land Use assessment includes physical activity baseline data, and considers the potential for construction, operation and decommissioning activities to affect the use and enjoyment of Public Rights of Way, recreational routes, green and blue spaces, tourism and recreation assets, and other publicly accessible

recreational environments. Particular consideration should be given to temporary closures, diversions, severance, changes in amenity, perceived safety, landscape change and alterations to the quality or attractiveness of recreational environments.

9.21 Where such pathways are identified, the assessment should explain whether changes in access, connectivity, amenity or recreational quality are likely to influence opportunities for physical activity, recreation and wellbeing amongst affected communities, and how these effects have informed the overall health and wellbeing conclusions.

Perceived Control, Uncertainty and Prolonged Disruption

9.22 SCC welcomes the inclusion of socio-cultural effects within the Socio-economics, Tourism, Recreation and Land Use assessment, including consideration of community identity, way of life, access to social infrastructure and amenity effects as set out in table 15.1.

9.23 It is not clear however whether the assessment will consider the potential implications of prolonged disruption, repeated phases of activity, cumulative infrastructure development and extended periods of environmental change for community wellbeing. Individual phases of construction or environmental change may have limited effects when considered in isolation, but prolonged or repeated disruption, particularly where other major infrastructure projects are occurring concurrently or sequentially, may result in communities experiencing sustained change with limited opportunity for recovery, respite and adaptation.

9.24 SCC therefore recommends that the Socio-economics, Tourism, Recreation and Land Use assessment considers whether prolonged construction activity, changes to community conditions, repeated project phases or interactions with other major infrastructure projects could result in wider effects on community wellbeing. Particular consideration should be given to communities experiencing concurrent or sequential infrastructure development, where the combined experience of disruption may differ from that associated with an individual project considered in isolation.

Community engagement and wellbeing

9.25 SCC recommends that where relevant to the assessment and management of effects on mental health and community wellbeing, the Applicant gives due consideration to SCC's Community Engagement and Wellbeing Supplementary Guidance Document[12]. The guidance identifies effective and collaborative engagement as important to procedural fairness and the

[12] https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf

protection of community wellbeing. These principles should inform the Applicant's approach to engagement and the identification, assessment and mitigation of community wellbeing effects throughout the project.

10 Public Rights of Way and Other Green Access

10.1 Suffolk County Council considers that the Environmental Statement should include a dedicated chapter for public rights of way, green access and recreation assessment, to ensure impacts are captured in a holistic manner, rather than split amongst different chapters.

10.2 The assessment should extend beyond definitive public rights of way to include open access land, permissive routes, promoted routes, informal access opportunities, green lanes and fen droves where these are used, or are likely to be used, for recreation, active travel, access to nature, landscape appreciation, and health and wellbeing purposes.

10.3 Public rights of way and green access infrastructure are not simply transport corridors. They are important public assets which provide opportunities for walking, wheeling, cycling and horse riding; support physical and mental health; facilitate access to nature; contribute to the visitor economy; and enable people to experience and enjoy Suffolk's landscapes. The Suffolk Green Access Strategy identifies these functions as a key part of the county's wider green infrastructure network.

10.4 The EIA scoping must of course include the operational impact of the wind farm as well as construction impact.

10.5 The Environmental Statement should therefore assess not only impacts on the physical access resource but also impacts on the quality of the recreational experience and amenity value available to users. This should include consideration of effects arising from visual intrusion, landscape change, loss of tranquillity, noise, lighting, construction activity, traffic movements, severance, diversion, reduced connectivity and cumulative effects. SCC's established position is that walkers, cyclists, equestrians and wheeled users experience these effects collectively rather than individually, and they should therefore be assessed holistically.

10.6 Particular consideration should be given to the fen drove network within and around the Order Limits. Whilst many of these routes may not be recorded on the definitive map, they may nevertheless form an important component of the area's green access network and recreational offer. The Applicant should assess the droves' use by walkers, cyclists and equestrians and evaluate any direct, indirect or cumulative effects. It is reasonable to assume at least some of the droves:

- Form part of the character and accessibility of the fens;
- Appear likely to support recreational walking, cycling and equestrian use;
- Function as informal green access infrastructure;
- Contribute to landscape appreciation and quiet recreation;

10.7 A particularly relevant point is the affected landscape is relatively remote fen countryside. Whilst it may not contain the concentration of recreational destinations found elsewhere in Suffolk, that increases rather than decreases the value of the green access resource. The ability to walk, wheel, cycle or ride through open fenland landscapes, experience tranquillity, wildlife and expansive views, and access nature close to home is itself an important recreational asset. This is especially relevant where alternative opportunities are limited.

10.8 For operational impacts, these are equally relevant to recreational users because they may persist for decades. The assessment should therefore consider:

- visual dominance of turbines;
- shadow flicker affecting users of routes;
- aviation lighting;
- effects on landscape character experienced from routes;
- changes in perception of tranquillity and remoteness.

10.9 And on cumulative effects, the applicant should assess impacts on recreational users arising from:

- Redmere itself;
- other energy infrastructure;
- transmission projects;
- BESS facilities;
- associated highway works.

10.10 A PRoW and other green access user experiences all infrastructure together, not project by project.

10.11 In accordance with the mitigation hierarchy, the Applicant should first seek to avoid adverse effects on public rights of way, green access opportunities and recreational amenity. Where effects cannot be avoided, appropriate mitigation measures should be provided. Where significant residual adverse effects remain, SCC would expect compensatory measures to be provided that deliver equivalent or enhanced public benefit.

10.12 Such measures could include the creation of new access opportunities, upgrades to existing routes, enhanced connectivity between communities and the countryside, improvements to multi-user routes, increased accessibility for wheeled users, enhancement of the fen drove network, or other green access improvements. Where physical mitigation cannot reasonably offset the harm arising from the development, SCC would expect the applicant to consider

appropriate financial contributions towards the improvement of public rights of way and green access infrastructure in the surrounding area.

10.13 Consistent with national planning policy, the objective should not simply be to minimise harm, but wherever practicable to leave the public rights of way and green access network in a measurably better condition than before development commenced. The applicant should therefore demonstrate how opportunities to enhance access, connectivity, recreation, active travel and access to nature have been identified and incorporated into the design of the project.

11 Socio-economics and Skills

11.1 SCC welcomes the Applicant's decision to scope in the potential effects of construction and decommissioning employment within the Local Study Area. SCC agrees that significant socio-economic effects may arise as a result of construction workforce demand and that these effects warrant detailed assessment within the Environmental Statement ("**ES**"). However, whilst the Scoping Report acknowledges the potential for significant effects, no mitigation measures are currently identified for construction employment. SCC considers that the ES should not rely solely on the assumption that employment creation represents an inherent benefit of the Proposed Development. Instead, the ES should demonstrate how workforce opportunities will be maximised and how adverse effects arising from labour market pressures will be managed, particularly in the context of multiple concurrent NSIPs and major infrastructure projects expected to generate demand for skilled labour across Suffolk and the wider region.

11.2 In accordance with SCC's socio-economic assessment guidance, the ES should provide a comprehensive assessment of workforce requirements across the construction, operational and decommissioning phases. This should include workforce forecasts, occupational and skills profiles, labour demand by discipline, workforce sourcing assumptions and assessment of home-based employment opportunities. SCC expects the ES to identify the anticipated proportion of the workforce sourced from within the Local Study Area, Suffolk, the wider East of England and beyond, together with justification of the assumptions applied. SCC welcomes the inclusion of cumulative effects within the proposed assessment and expects consideration of competition for labour, workforce displacement, skills shortages and impacts on existing employers and key sectors.

11.3 SCC notes that the baseline presented within the Scoping Report focuses principally on employment and economic indicators. SCC also expects the ES to include an appropriately proportionate skills and labour market baseline,

including consideration of workforce qualifications, sectoral employment patterns, occupations in demand, existing skills shortages and the capacity of education and training providers to support forecast workforce requirements. This will provide an important evidence base for assessing likely workforce availability and informing appropriate mitigation measures.

11.4 SCC notes that the only identified skills-related mitigation measure within the Scoping Report is the preparation of a Skills and Employment Strategy during the operational phase. Given that construction employment is expected to represent the most significant employment impact and exceed operational workforce requirements, it is unclear why skills mitigation is proposed solely for operation and maintenance activities. SCC considers that a Skills and Employment Strategy should be developed from the construction phase onwards and assessed as part of the mitigation framework. This should identify opportunities for local workforce participation, apprenticeships, training and wider skills development throughout the project lifecycle and align with SCC's Regional Skills Coordination Function and socio-economic guidance[13].

11.5 The ES should include a detailed assessment of construction and decommissioning workforce characteristics, including workforce numbers by phase and trade, duration of demand, workforce origins, accommodation requirements and any associated need for workforce accommodation strategies. SCC also expects the assessment to consider the capacity of local schools, colleges, universities and training providers to support forecast workforce demand and opportunities to develop local skills pipelines. The assessment should consider cumulative competition for labour and specialist skills, including the potential displacement of labour from existing employers, public services and other sectors already experiencing recruitment challenges.

11.6 SCC notes that the Scoping Report proposes to scope out significant effects on local businesses and economic sectors during operation on the basis that operational employment and expenditure are expected to be limited and dispersed. Whilst SCC acknowledges that operational workforce requirements are likely to be lower than those associated with construction, further justification is required. The Scoping Report identifies potential opportunities for businesses in sectors including engineering, maintenance, transport, accommodation and business services, and SCC therefore expects the ES to assess potential supply-chain opportunities, local business capacity and readiness to participate in project delivery, local procurement opportunities

[13] https://www.suffolk.gov.uk/asset-library/nsip-socioeconomic-effectnsips.v6.pdf

and indirect and induced economic effects across the construction, operational and decommissioning phases.

11.7 Overall, SCC considers that the proposed assessment methodology should be strengthened to provide a more comprehensive understanding of workforce, skills and supply-chain effects throughout the project lifecycle. The ES should clearly define and justify separate workforce and supply-chain study areas, reflecting workforce catchments, labour market geographies and anticipated supply-chain opportunities. SCC expects the assessment to demonstrate how local skills, employment and business opportunities will be maximised, how cumulative labour market impacts will be assessed and how appropriate mitigation measures will be secured to manage potential adverse effects.