

**SIZEWELL C PROJECT: TWO VILLAGE BYPASS – BIOSCAN UK LTD COMMENTS ON ECOLOGY (27 JULY 2021)**

On behalf of Farnham Environment Residents and Neighbours (FERN) – PART A

<b>9.28 Comments on Written Representations [REP3-042] pertaining to ecology</b>		
<a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-005469-D3%20-%20The%20Sizewell%20C%20Project%20-%20Comments%20on%20WRs.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-005469-D3%20-%20The%20Sizewell%20C%20Project%20-%20Comments%20on%20WRs.pdf</a>		
<b>FERN comments</b> [as reproduced at <b>REP3-042</b> ]	<b>SZC comments</b> [ <b>REP3-042</b> ]	<b>Bioscan UK Ltd response</b>
<p>Part 1 of FERN response – Para 17: There has been no proper examination of Nuttery Belt (and therefore ignorance as to whether it is AW and of ecological value) and the failure to look at the Farnham Hall area habitats.</p>	<p><i>The two village bypass site has been subject to a Phase 1 Habitat survey [APP-426], including external views of Nuttery Belt, which enabled it to be mapped as broadleaf woodland. However, despite some misnumbering of the Target Notes for the Phase 1 survey in Table 5.1 [APP-426] and Figure 7.3 [APP-427], Nuttery Belt was not directly visited. It is not unusual to have some areas of a route corridor which are not visited directly, and this does not undermine the baseline. SZC Co. considers that the assessments presented in the ES and ES Addendum are robust.</i></p> <p><i>Natural England are responsible for designating and updating the ancient woodland inventory, based on documentary evidence and attributes and characteristics of the woodland. It is not within SZC Co.'s jurisdiction to designate a woodland as ancient woodland.</i></p> <p><i>Whilst there are two listed ancient woodlands in close proximity to the two village bypass site (Pond Wood and Foxburrow Wood), Nuttery Belt is not designated as ancient woodland.</i></p>	<p>The Applicant admits to not having directly surveyed the woodland except for a cursory check during the Phase 1 survey in 2019 which simply verified that the block was in fact broadleaved woodland and not another habitat entirely [<b>REP3-042</b>, page 73].</p> <p>It is the duty of the Applicant to present an evidence-base to define the baseline interest. It is alarming to read SZC's statement that '<i>It is not unusual to have some areas of a route corridor which are not visited directly, and this does not undermine the baseline</i>'. The admission that surveys were simply omitted in parts of the site, but with the assumption that the baseline would not be undermined as a result, speaks volumes about the Applicant's cavalier approach to assessment.</p> <p>An assessment which is based on absent field survey information for features that would be subject to impacts (including direct removal of established woodland by reference to Clearance Plan Rev3 reference SZC-SZ0701-XX-000-DRW-100168 and -100169 [<b>REP4-003</b>]), cannot be considered robust; and it is clear that despite any</p>

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<b>FERN comments</b> [as reproduced at REP3-042]	<b>SZC comments</b> [REP3-042]	<b>Bioscan UK Ltd response</b>
	<p><i>Pond Wood was recently added to the AWI and the boundary of Foxburrow Wood was amended, however there was no change to the status of Nuttery Belt.</i></p> <p><i>A detailed tree survey for the two village bypass site is currently being undertaken and the report will be shared with the examination at the earliest opportunity. In addition to this, further ecological surveys are being undertaken for the two village bypass site, where access is possible, to inform the examination, as requested in the Examining Authority's Rule 8(3) letter published on 18 June 2021 [PD-027]. These additional surveys will be provided to the examination at Deadline 4 on 1 July 2021.</i></p>	<p>possible attempts to now retro-fit a survey, the design of the scheme, and the assessment, has been based upon previous incomplete survey information.</p> <p>It is widely understood that Natural England's (NE's) ancient woodland inventory excludes by default any woodland smaller than 2ha, and as such NE's inventory is irrelevant in this context, noting that Nuttery Belt is 0.6ha and would therefore never have been subject to assessment by Natural England. The Applicant cannot therefore claim that the authority on whether a woodland &lt;2ha in size should be classified as ancient woodland lies with Natural England: this block will simply never have been considered by SNCO previously.</p> <p>SZC should also not seek to rely upon the absence of a County Wildlife Site (CWS) designation, as we understand that to date Nuttery Belt has not to date been subject to a specific survey by the Suffolk's CWS officers, and as such the lack of a CWS designation does not mean that the site would not qualify as a CWS. However, we understand from correspondence with the Suffolk Biodiversity Information Service (SBIS) that SBIS is about to embark upon an ancient woodland inventory mapping contract on behalf of Natural England, and</p>

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		<p>as such Nuttery Belt will be considered for inclusion on the inventory as part of that project.</p> <p>In any event, as SZC has itself stated [REP3-042, page 74]: <i>“The designation of CWS status is independent from the designation of Ancient Woodland. They are sites of local importance designated by the Suffolk County Wildlife Sites panel in line with Natural England guidelines. The Suffolk CWS panel has a specific and closely defined remit, and follows a specific procedure, made up of expertise from SCC, Suffolk Biodiversity Information Service (SBIS), Suffolk Wildlife Trust and Natural England. The Panel meets to assess and designate potential CWSs based on information submitted to them and the boundaries of sites may also be reviewed and amended in the light of new information following the CWS Review Procedure. The Suffolk register of CWSs includes their location, boundaries and key features, and a map of CWSs is maintained and updated by SBIS.”</i> Therefore, it cannot be assumed that Nuttery Belt would not be designated a CWS, if it were subject to an assessment under the relevant review procedure.</p>

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<b>FERN comments</b> [as reproduced at REP3-042]	<b>SZC comments</b> [REP3-042]	<b>Bioscan UK Ltd response</b>
<p><b>Part 3</b> of FERN Response – Para 4.4.2: The removal of the ‘Link-Strip’ between Foxburrow Wood and Palant’s Grove from Natural England’s ancient woodland inventory could potentially diminish the justification for its inclusion within the Foxburrow Wood CWS boundary.</p> <p><b>Part 9</b> of FERN Response – page 4 The link between Foxburrow Wood and Palant’s Grove is now not designated as AW, and it should also be assumed that it is also now not CWS.</p>	<p><b>Part 3.</b> <i>Please refer to SZC Co.'s Comments on the Councils’ the LIR (Chapter 8) (Doc Ref. 9.29)).</i></p> <p><b>Part 9.</b> <i>The designation of CWS status is independent from the designation of Ancient Woodland. They are sites of local importance designated by the Suffolk County Wildlife Sites panel in line with Natural England guidelines. The Suffolk CWS panel has a specific and closely defined remit, and follows a specific procedure, made up of expertise from SCC, Suffolk Biodiversity Information Service (SBIS), Suffolk Wildlife Trust and Natural England. The Panel meets to assess and designate potential CWSs based on information submitted to them and the boundaries of sites may also be reviewed and amended in the light of new information following the CWS Review Procedure. The Suffolk register of CWSs includes their location, boundaries and key features, and a map of CWSs is maintained and updated by SBIS. Therefore, it cannot be assumed that the CWS status of the central neck between the Ancient Woodlands was wrongly applied, or indeed wrongly maintained. It remains an interconnecting area of woodland which provides ecological connectivity between the Two Ancient Woodlands. Its designation is not surprising and its removal would be detrimental to the purposes of the CWS and to the Ancient</i></p>	<p><b>Part 3.</b> The Local Impact Report (LIR) [REP1-045] was written prior to FERN’s submissions on ecology [REP2-265] and therefore the assessments made in that report cannot fully apply to this matter as they were based upon an incomplete dataset.</p> <p><b>Part 9.</b> SZC should clarify whether they have sought advice on the status of this designation from the CWS Panel.</p>

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FERN comments [as reproduced at REP3-042]	SZC comments [REP3-042]	Bioscan UK Ltd response
	<p><i>Woodlands. For more information, please refer to SZC Co.'s response to the Responses to the Examining Authority's First Written Questions at AI.1.22 [REP2- 100], including the Two Village Bypass Summary Paper (Appendix 5C of the SZC Co. responses to ExQ1) [REP2-108].</i></p>	
<p>Part 3 of FERN Response – Para 4.6.1: The alternative route alignment proposed by Farnham with Stratford St Andrew Parish Council is considered to minimise impacts on ancient hedgerows, veteran trees and wildlife. The disbenefit of this alignment would be the resulting direct land-take from the 'link-strip' woodland between Foxburrow Wood and Palant's Grove. However, there is scope to restore connectivity between Foxburrow Wood and Palant's Grove by embanking the road slightly in this location and installing an underpass for wildlife beneath it, to reduce potential impacts on wildlife.</p>	<p><i>SZC Co. has worked closely with the local stakeholders as part of the evolution of the design and preferred alignment of the two village bypass. Chapter 16 of the Local Impact Report (LIR) [REP1-045] sets out Suffolk County Council and East Suffolk Council's position on the two village bypass. At paragraph 16.54 of the LIR [REP1-045] it states that "the Councils consider that the route proposed by the Applicant is the least worst option when considering impacts on Foxburrow Wood and its position is subject to satisfactory detailed design of the bypass."</i></p>	<p>The Local Impact Report (LIR) [REP1-045] was written prior to FERN's submissions on ecology [REP2-265] and therefore the assessments made in that report were based upon an incomplete dataset. The Applicant should not seek to hide behind now outdated statements made by a third party, which has so far been provided with inadequate baseline survey information on which to base a decision.</p>

**SIZEWELL C PROJECT: TWO VILLAGE BYPASS – BIOSCAN UK LTD POST-HEARING SUBMISSION ON ECOLOGY (27 JULY 2021)**

On behalf of Farnham Environment Residents and Neighbours (FERN) – PART B

<p><b>9.39 Response to the ExA's Request for Further Information at Deadline 4 [REP4-006] pertaining to ecology</b></p> <p><a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-005596-The%20Sizewell%20C%20Project%20-%20Responses%20to%20any%20further%20information%20requested%20by%20the%20ExA%20for%20this%20Deadline.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-005596-The%20Sizewell%20C%20Project%20-%20Responses%20to%20any%20further%20information%20requested%20by%20the%20ExA%20for%20this%20Deadline.pdf</a></p>		
The ExA's Request as set out within: PD-027 Rule 8 (3) and 17 Letter [PD-027]	The Applicant's Response as set out in: Response to the ExA's Request for Further Information at Deadline 4 [REP4-006]	Bioscan UK Ltd response to <b>REP4-006</b> with additional post-hearing comments
<p>Please will the Applicant direct the ExA to the exact parts of the ES and other application documentation which set out:</p> <p>(i) exactly where the veteran trees are located in relation to the Two Village Bypass (TVB) order limits, and alignment, showing precisely which such trees will or may be felled.</p>	<p><i>2.2.1 In response to the Examining Authority's request, SZC Co. has prepared Figure 1 which shows that two veteran trees, one ancient tree and one notable tree are proposed to be felled. Figure 1 shows the locations of these trees, and also the location of the one ancient tree, the two veteran trees and the one notable tree that are proposed to be retained.</i></p> <p><i>2.2.2 In response to the Examining Authority's request, SZC Co. also submits an Updated Clearance Plan (SZC-SZ0701-XX-000-DRW-100169 Rev 3) as part of the Two Village Bypass Plans for Approval (Doc Ref. 2.8(B)) at Deadline 4. This Updated Clearance Plan replaces plan SZC-SZ0701-XX-000-DRW-100169 Rev 2 [AS-128]. The updated clearance plan results in the retention of an 8m hedgerow to the south of the existing path at Farnham Hall.</i></p>	<p>By reference to the Updated Clearance Plan reference SZC-SZ0701-XX-000-DRW-100168 and -100169) Rev 3 [REP4-003] the Applicant now acknowledges that their proposals would require the removal of a number of veteran, ancient and notable trees from the Farnham Hall environs.</p> <p>It is not clear whether or not veteran, ancient and notable trees may also be present within other impacted features such as Nuttery Belt and The Belt, particularly in view of the Applicant confirming that "Nuttery Belt was not directly visited" [REP3-042] until June 2021 [REP4-006], and in light of the Applicant's apparent reluctance to classify any tree as veteran, ancient and notable, until the evidence is put directly to them by third parties such as FERN.</p> <p>The Applicant had previously only given consideration to the presence of mature trees in the context of potential bat roosting sites, and the ES [APP-425] apparently omits any consideration of the intrinsic value of veteran, ancient and notable trees, and the direct impacts resulting from their loss. The</p>

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Applicant had the opportunity to update its ES assessment within its recent response [REP4-006] but remarkably has chosen at the relevant section (para 3.1.2 – 3.1.3) to make no reference at all to the impacts generated by the identified removal of these veteran, ancient and notable trees (consideration is given only to woodland and hedgerows).

This is in spite of the NPPF's<sup>1</sup> clear policy stance that *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”*, and as the Applicant now acknowledges that such trees will be lost to their proposals, it is unclear how their assessment has remained unchanged by this new information.

The Applicant should therefore:

1. Provide clear and unambiguous documentation confirming whether all features within the Order Limits have been subject to specific surveys to identify the presence of veteran, ancient and notable trees; and

<sup>1</sup> MHCLG (July 2021) National Planning Policy Framework. Available from: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

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		2. Clarify how this information changes (a) its assessment of alternatives and how this has been factored into the process of route selection (e.g. in relation to trees 207278 and 207279), and (b) the ecological impact assessment, which to date contains no reference to the significance of these trees.
(ii) the relationship between the order limits and alignment of the TVB in relation to both Foxburrow Wood, and Farnham Hall, Farnham Hall Farm House and (if different) Farnham Manor (showing and labelling the component parts using the dwelling names of those building complexes) and any trees in the ancient woodland which will or may be felled;	<p><i>3.2.1 The Applicant's response to this request is presented in Figure 2 and Appendix A. Figure 2 shows the relationship between the order limits and alignment of the Two village bypass in relation to Foxburrow Wood, Farnham Hall, Farnham Hall Farm House and Farnham Manor. Appendix A is a table setting out the distances between the Two village bypass and the properties at Farnham and Foxburrow Wood.</i></p> <p><i>3.2.2 Section 1.4 of Appendix B confirms that Foxburrow Wood CWS ancient woodland would be retained in its entirety. A buffer distance of 15m from earthworks is proposed to prevent impacts to the trees on the edge of the woodland. The retention of this ancient woodland is also clearly shown Figure 1.</i></p>	We note that the scheme continues to allow for the retention of Foxburrow Wood. However, the Applicant has still not fully engaged with the questions of indirect impacts, particularly in respect of potential hydrological impacts and the negative effects of drying on the condition of this ancient woodland habitat.



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(iii) the same in relation to Pond Wood and Nuttery Belt, and	<p><i>4.2.1 The Applicant's response to this request is presented in Figure 3 and Appendix B. Figure 3 shows the relationship between the order limits and alignment of the Two village bypass in relation to both Pond Wood and Nuttery Belt. Appendix B sets out the distances between the Two village bypass and Pond Wood and Nuttery Belt.</i></p> <p><i>4.2.2 Nuttery Belt is not ancient woodland. The eastern component of Pond Wood is ancient woodland, and Section 1.4 of Appendix B confirms that there would be no landtake or direct impacts to Pond Wood as it would be retained in its entirety. The retention of this ancient woodland is also clearly shown Figure 1.</i></p>	<p>Figure 3 illustrates that the proposals would result in direct land-take from both ends of the Nuttery Belt woodland block.</p> <p>We note by reference to the Applicant's recent submission <b>[REP4-006]</b> that a formal survey visit to Nuttery Belt was only finally undertaken (at the ExA's request) on 28 June 2021. This date is (i) 2no years after the main survey work to inform the scheme was undertaken, and (ii) in any event, outside of the optimal spring period for woodland survey, and also in sub-optimal wet weather conditions.</p> <p>The Applicant's findings were documented via a single paragraph <b>[REP4-006]</b> as follows:</p> <p><i>"3.1.5 Nuttery Belt is a small patch of woodland consisting of predominately mature and semi-mature ash and oak. A dense groundflora is present, dominated by cow parsley (<i>Anthriscus sylvestris</i>), nettle and ground ivy (<i>Glechoma hederacea</i>)."</i></p> <p>The survey has self-evidently overlooked vernal ancient woodland indicator (AWI) such as bluebell, primrose and dog's mercury, and no reference has been made to the presence of the various other AWI species that are present within the woodland (e.g.</p>

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field maple, Midland hawthorn, crab apple, and wild cherry). Furthermore, no attempt had been made to refer to historical maps that could reveal the age of the woodland, despite the readily-accessible first series Ordnance Survey mapping showing both Nuttery Belt and The Belt as pre-existing woodland features in 1883.

SZC's original assessment (which remains unchanged) therefore appears to have been formed on the basis of incomplete third-party desk study data, without direct survey or rigorous interpretation of the findings. There is no documentation of site-specific evidence, nor is there any indication that an independent assessment has been undertaken in considering whether or not Nuttery Belt (and other woodlands) could be ancient in origin. In this respect the baseline survey and assessment information should be considered deficient.

(iv) assessment of **bats and any other protected species** which use any parts, fly-lines, commuting routes, roosting, nesting or foraging areas related to those places.

*5.2.1 The Applicant's response to this request is presented in two parts within this paper, as detailed below:*

**BATS: tree roosts.** The Applicant has now updated survey information in relation to the assessment of trees for bat roost potential [REP2-121 and REP2-121], which included climbed inspections of the relevant trees in January/February 2021 and/or ground-based assessment. However, given that

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	<ul style="list-style-type: none"> <li>• <i>Part 1 – Appendix B: Summary of Information Included within the Application to present a summary of:</i> <ul style="list-style-type: none"> <li>– <i>Information on the baseline conditions and assessment findings presented with within Volume 5, Chapter 7 of the Environmental Statement [APP-425], Volume 1, Chapter 5 of the ES Addendum [AS-184] and supporting technical appendices and annexes in Appendix 7A [APP-426].</i></li> </ul> </li> <li>• <i>Part 2 – Appendix C: Two Village Bypass: Additional Ecology Surveys to present two additional short surveys undertaken on 28th June 2021 of Foxburrow Wood, Farnham Hall Farm House, Farnham Manor, Ancient and Veteran trees, Pond Wood and Nuttery Belt (which supplements the information provided in Part 1 – Appendix B):</i> <ul style="list-style-type: none"> <li>– <i>Extended Phase 1 Habitat Survey of these habitat features; and</i></li> </ul> </li> </ul>	<p>standard best practice guidance<sup>2</sup> prescribes for trees with high potential to support bat roosts, that further surveys are required (e.g. a combination of 2no further dusk/dawn surveys and/or a climbed tree inspection survey), it would appear that at least some of the survey work undertaken to date falls short of best practice, especially given that much evidence of summer bat use is likely to have deteriorated to the point of being undetectable by January/February. <u>We understand that more survey work is to follow and would welcome clarification as to whether the 28 trees identified as having moderate or high potential for bats (as Table 2 [REP2-121]) will be subject to roost identification surveys in full accordance with best practice guidance.</u> This includes in particular the trees where climbed surveys were constrained and have not been surveyed by any other means.</p> <p>Without such information, the Applicant's statement at para 2.3.9 [RE4-006] that "<i>No confirmed roosts were identified</i>" risks being extremely misleading.</p>

<sup>2</sup> Collins, J. (ed) (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines (3<sup>rd</sup> edn). Bat Conservation Trust, London. Available from: <https://www.bats.org.uk/resources/guidance-for-professionals/bat-surveys-for-professional-ecologists-good-practice-guidelines-3rd-edition>

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	<p><i>– Bat Emergence and Re-entry Survey of trees east of Farnham Hall</i></p> <p><i>– Note that the results of the additional surveys do not change the conclusions reached within Volume 5, Chapter 7 of the Environmental Statement [APP-425], Volume 1, Chapter 5 of the ES Addendum [AS-184]</i></p> <p><i>5.2.2 Whilst a substantial ecological baseline is in place for these habitat features (see Appendix C) and is sufficient for EIA purposes, SZC Co. will undertake additional surveys, given the concerns of stakeholders and to provide additional information to support Request 4. Subject to appropriate access being granted, the following surveys will be undertaken and the results submitted to examination at Deadline 7:</i></p> <ul style="list-style-type: none"> <li><i>• Further emergence and/or re-entry surveys or an internal endoscope survey undertaken by a suitably qualified ecologist (with a bat and barn owl licence), to confirm the presence/absence of roosts in any trees which would be felled, prior to felling (see also Appendix C).</i></li> </ul>	<p>Notwithstanding the above, we note that the results of the Applicant's sole documented dusk survey of the trees with potential for bats are recorded in two scant paragraphs [REP4-006] as follows:</p> <p><i>"3.2.1 During a daytime assessment of ancient and veteran trees 207278 and 207279, large cracks and crevices and broken limbs were identified (as shown in the photographs below) and, therefore, both trees were assessed as having a high potential to support roosting bats (in 2020 [REP2-121] and reconfirmed in June 2021).</i></p> <p><i>3.2.2 During the dusk survey both common pipistrelle Pipistrellus [sic] and soprano pipistrelle Pipistrellus pygmaeus were observed in and around both trees."</i></p> <p>Further information that would allow these findings to be independently scrutinised (such as the experience/qualification of both surveyors, their position/location during the survey, the earliest time at which bats were first detected, and a plan mapping the movements of the bats) is not provided. That notwithstanding, given the difficulties associated with surveying trees with a full summertime leaf canopy, in low light levels, and using the naked eye, and in the absence of thermal imaging camera footage to afford more clarity, <u>it is</u></p>

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- *Walkover survey of the habitat features including hedgerows/boundaries to further assess for field signs of badger.*
- *Habitat assessment of Pond Wood, Nuttery Belt and Foxburrow Wood for roosting bats, with particular focus on identifying trees in the periphery of the woodland (which are most likely to be impacted) and trees with suitability for supporting roosting barbastelle.*
- *Back-tracking survey for bats.*
- *Preliminary Bat Roost Assessment of buildings within the Farnham Hall/Manor complex and Farnham Hall Farmhouse complex, with follow-up presence/absence surveys of buildings likely to be indirectly impacted.*

reasonable to assume that these trees (identified variously as '207278 and 207279' OR '97 and 98' by the Applicant) may well support a bat roost/s, and the Applicant should provide an assessment on that basis.

**BATS: building roosts.** The ExA has specifically requested [PD-027] an “assessment of bats ... which use any parts, fly-lines, commuting routes, roosting, nesting or foraging areas related to” ... “Farnham Hall, Farnham Hall Farm House and (if different) Farnham Manor”. By reference to para 2.3.17 of the Applicant’s response [REP4-006] no such information has been provided. Please refer to FERN’s submissions on ecology [REP2-265] at section 3.3, where reasons are provided as to why the Applicant’s assessment should be considered deficient if absent of such information.

**BATS: activity surveys.** We note that the latest surveys have only now identified the presence of a barbastelle foraging area in the vicinity of Nuttery Belt, i.e. one of the woodlands that would be subject to direct habitat loss [REP4-006, page 27]. To date this impact on the Annex II species barbastelle does not appear to have been specifically addressed in

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SZC's submissions, despite the direct landtake from this woodland.

**DORMOUSE.** The ExA has also requested information in relation to "assessment of ... **any other protected species** which use any parts... related to those places [the Farnham Hall environs]".

However, the Applicant has until this point failed to have any regard to the potential presence of dormouse, despite it being highlighted within FERN's submissions on ecology [REP2-265] at section 3.1, which highlighted the presence of a PTES-verified record of a dormouse nest found just north of Benhall Green in October 2017, potentially within 1-2km of the DCO boundary. Indeed, the potential for impacts on this species appear to have been entirely overlooked throughout the process of design and assessment, despite the potential for significant impacts on habitat for a protected species which is already at the edge of its range in this part of Suffolk and therefore subject to particular sensitivities.

Indeed, the Applicant has only finally now offered to undertake a survey at this late stage, having been put

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on the spot during the Issue Specific Hearing on 16 July 2021.

We would like to highlight that it is now too late for the Applicant to undertake a robust survey for dormouse by conventional means<sup>3</sup>, and any issues arising as a result of the Applicant failing to tackle this sooner are entirely of their own making. A separate 'Note on survey for dormouse *Muscardinus avellanarius*' (dated 15 July 2021) has been issued by FERN, clarifying this in detail.

**GREAT CRESTED NEWT.** We note that further survey information is currently pending, but we nonetheless highlight that some ponds still appear to be missing from the Applicant's assessment. Despite the provision of a map within FERN's submissions on ecology [REP2-265] at Figure 3, clearly showing the location of ponds within the Farnham Hall environs, it would appear by reference to the Applicant's submission [REP4-006] at Figure 7 that some ponds have still escaped the attention of the Applicant (i.e.

<sup>3</sup> Natural England (2015) Standing advice for local planning authorities to assess the impacts of development on hazel dormice. Available from: <https://www.gov.uk/guidance/hazel-or-common-dormice-surveys-and-mitigation-for-development-projects#survey-methods>

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		<p>further ponds have not been included on the map and lack HSI &amp; eDNA data).</p> <p><b>BIRDS: Barn owl.</b> We note that a barn owl roost has been identified by the Applicant within a tree proposed for removal. This is additional to the barn owl roosts identified within FERN's submissions on ecology <b>[REP2-265]</b> at para 3.6.1. However, no assessment has been made of potential impacts on this species, including in relation to loss of roost sites, or on road collision impacts arising from the A12 being re-routed immediately adjacent to a regularly used tree-roost (and potential breeding site).</p> <p><b>SUMMARY.</b> As a final point, we note the Applicant's intention to submit all further survey information by deadline 7. However, given that the design of the scheme is now more-or-less fixed, it is difficult to see how further constraints information submitted at this late stage in the Examination could possibly be used to inform a redesign of the scheme that would avoid generating ecological impacts: it is simply too late in the process to be submitting further information.</p>