

Title: Natural England's Written Representations

Examining Authority's submission deadline 11 October 2023.

Summary of Natural England's Advice

Internationally designated sites

- Natural England has asked to be consulted for comment on the hydrogeological risk assessment (detailed as a requirement of the Code of Construction Practice (CoCP) good practice measure GH07) to ensure there will be no impact to the Stour and Orwell Estuaries Special Protection Area (SPA) and Stour and Orwell Estuaries Ramsar site.

Nationally designated sites

- Natural England still considers that there are potential impacts on both Hintlesham Woods SSSI 'lowland mixed deciduous woodland' and 'breeding bird assemblages - mixed: scrub and woodland' interest features. Following the submission of our Relevant Representations and subsequent discussions, the applicant stated on the 7 September 2023 that they will provide two technical notes, which will provide further information for Natural England to review.
- Natural England continue to advise that Arger Fen SSSI should be included in the Groundwater Dependent Terrestrial Ecosystem (GWDTE) assessment.
- It is still unclear what the potential impacts of the scheme are on barbastelle which may be considered part of the feature 'hibernating bat roost' at Little Blakenham Pits SSSI. Natural England Wildlife Licensing Service will review the information provided in the previous draft licence application and provide comment on the conclusions reached in due course.

Protected species

- The Applicant has resubmitted a draft protected species licence application for dormouse. This will be reviewed and a decision on the issue of a letter of no impediment (LONI) will be made in due course.
- Natural England has issued a LONI **with caveats** for bats and badger.

Nationally designated landscapes

- The Applicant has provided further information, allowing for a full assessment of the project's effect on the special qualities of the Dedham Vale Area of Outstanding Natural Beauty (AONB) for both the construction and operational phases. Natural England are satisfied with the information provided.
- The applicant has addressed Natural England's queries around 'the setting' of the AONB and welcome the ongoing discussion of this topic between the Applicant and the AONB Partnership.
- Natural England are satisfied with the further information the Applicant has provided on the Landscape and Visual Impact Assessment (LVIA) Methodology.

Soils and best and most versatile agricultural land

- Natural England considers that there are still outstanding issues which need to be addressed with regards to survey work, which is expected before construction work begins. A detailed ALC and soil survey of the agricultural land should be undertaken across the full study area to inform the EIA. Natural England continues to advise that areas which have not been subject to a detailed Agricultural Land Classification (ALC) survey should be surveyed prior to construction, to inform soil handling and restoration criteria.
- A Soil Management Plan (SMP) should be prepared (which can be included within the Construction Environmental Management Plan (CEMP)), informed by a detailed soil survey.

Ancient woodland and ancient/veteran trees

- We are awaiting a technical note on proposals at each ancient woodland within 15 metres of the Order Limits, which will be reviewed before further comment is made.

Other valuable and sensitive habitats and species, landscapes and access routes

- Natural England acknowledge and accept the Applicant's comments on our Relevant Representation on the issues raised by Natural England regarding the loss and modification/degradation of Habitats of Principle Importance (HPI).