

SP MANWEB

Reinforcement to the North Shropshire Electricity Distribution Network



Document Reference: 6.7.10
Environmental Statement Appendix 7.10
Ecology and Biodiversity Scoping Opinion Response

PINS Reference: EN020021
Regulation Reference: 5(2)(a)
November 2018

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Electricity Distribution Network**

APPENDIX 7.10

**ECOLOGY AND BIODIVERSITY
SCOPING OPINION RESPONSE**

Environmental Statement

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The Planning Act 2008**The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009****Regulation 5(2)(a)****Reinforcement to the North Shropshire Electricity Distribution Network****Environmental Statement: Appendix 7.10 – Ecology and Biodiversity Scoping Opinion Response**

Document Reference No.	6.7.10
Regulation No.	Regulation (5)(2)(a)
Author	Avian Ecology
Date	09 November 2018
Version	V1
Planning Inspectorate Reference No.	EN020021

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APPENDIX 7.10: ECOLOGY AND BIODIVERSITY SCOPING OPINION RESPONSE

1.1 INTRODUCTION

1.1.1 This section provides the response to the ecological assessment comments raised by the Secretary of State (SoS) within the Scoping Opinion¹. Table A7.10.1 lists the issues raised by the SoS within the Scoping Opinion and how these have been addressed in the Environmental Statement (ES).

Table A7.10.1: Issues Raised and Responses to the SoS Scoping Opinion		
Paragraph	Issue Raised by SoS	Response
Ecology and Biodiversity		
3.52	While the general approach described within Chapter 9 of the Scoping Report appears to be comprehensive, the SoS has a number of comments as described below.	-
3.53	The SoS notes that desk studies and field surveys will be continued in 2017, following on from work already carried out in 2016. The proposed study areas for each ecological receptor are described in Table 9.2. However it is not always clear what the justification is for the study area, for example, it is not clear how the study area for [REDACTED] relates to the zone of influence of the Proposed Development. The study areas used to gather the baseline data should be clearly explained and justified in the	All study areas agreed with Shropshire Council, clearly defined and presented in Chapter 7 'Ecology and Biodiversity' (DCO Document 6.7) of the ES with further details provided in the relevant appendices.

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020021/EN020021-000012-Scoping%20Opinion.pdf>

Table A7.10.1: Issues Raised and Responses to the SoS Scoping Opinion		
Paragraph	Issue Raised by SoS	Response
	ES. Where the selection of study areas has been determined by a review of the initial ecological data it would be helpful to summarise this data to support the justification.	
3.54	The intention to continue gathering baseline data is welcomed. Surveys should be thorough and up to date. The methods used to gather the data should be explained and it should be clear which professional guidance has been used. Where the methods used to collect baseline data depart from professional guidance the reasons for doing so should be clearly explained and justified. The Applicant is encouraged to agree their approach to gathering data and predicting effects with relevant stakeholders wherever possible.	Ecological assessment methodology, surveys and baseline were agreed with relevant stakeholders and presented in Chapter 7 'Ecology and Biodiversity' (DCO Document 6.7) and associated appendices of the ES.
3.55	Table 9.2 identifies some groups of species for which further survey work is not proposed. While this may be justified for some species, either because they are not likely to be present or would not be affected by the Proposed Development, the SoS notes with some concern that no surveys are proposed for reptiles. Given the legal protection given to reptiles against killing and injury, the	All surveys were agreed with the ecological officer at Shropshire Council based upon the Phase One Habitat Survey. Details are presented within Chapter 7 'Ecology and Biodiversity' (DCO Document 6.7), and associated appendices and Figure 7.11 'Reptile Habitats Suitability' (DCO Document 6.14).

Table A7.10.1: Issues Raised and Responses to the SoS Scoping Opinion

Paragraph	Issue Raised by SoS	Response
	Applicant is advised to consider whether the approach proposed in the Scoping Report will provide an adequate ecological baseline.	
3.56	The use of the Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines to determine the significance of effects is welcomed. However paragraph 9.7.18 of the Scoping Report states that only significant effects will be considered in detail. While it is acknowledged that this approach is in line with the CIEEM guidance, it should be clear in the ES what evidence has been used to decide which effects are likely to be significant.	How significant ecological effects are determined is presented in Chapter 7 'Ecology and Biodiversity' (DCO Document 6.7) and Appendix 7.1 (DCO Document 6.7.1). Section 4.7 of Chapter 4 'Approach and General Methodology' (DCO Document 6.4) of the ES presents how significant effects are determined.
3.57	The statement in paragraph 9.7.27 that there can be effects at a local level which are 'discernible' but not significant, but which will nonetheless be discussed in the mitigation section of the ES. If effects are significant at a local level then they should be assessed as such. If effects are not significant the SoS queries whether the 'mitigation' measures are actually enhancement measures.	Full details on the assessment methodology are presented in Chapter 4 'Approach and General Methodology' (DCO Document 6.4), Chapter 7 'Ecology and Biodiversity' (DCO Document 6.7) and Appendix 7.1 (DCO Document 6.7.1) of the ES.
3.58	The relevance of the Holford Rules to ecological impact assessment is not entirely clear. If it is referred to in the	Noted

Table A7.10.1: Issues Raised and Responses to the SoS Scoping Opinion		
Paragraph	Issue Raised by SoS	Response
	ES then it should be clearly explained why it is relevant and how the guidance has been taken into account.	
3.59	The commitment to continued exploration of opportunities for mitigation is welcomed. It must however be clear in the ES which mitigation measures have been taken into account in the assessment and how delivery of these measures has been secured through the DCO.	Approach to mitigation is set out in Section 4.7 of Chapter 4 'Approach and General Methodology' (DCO Document 6.4) of the ES.
3.60	The approach to assessing cumulative effects is also welcomed, particularly the intention to agree with Shropshire Council which developments should be included. The Applicant may also wish to establish with the Environment Agency whether they have any views on any projects which should be included.	The Cumulative Effects Assessment is presented in Chapter 12 'Cumulative Effects' (DCO Document 6.12) of the ES.
3.61	The Applicant's attention is drawn to the comments of Natural England, contained in Appendix 3 of this Opinion, particularly in relation to designated sites, and habitat and species surveys.	Natural England's comments are noted and have been fully considered within the ecology assessment presented within Chapter 7 'Ecology and Biodiversity' (DCO Document 6.7), and associated appendices.