

PINS ref: TR010044

FAO Emre Williams
The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Highways England
Woodlands
Manton Lane
Bedford
MK41 7LW

14 January 2022

Dear Mr Williams

Highways England
Development Consent Order (DCO) application for the A428 Black Cat to Caxton Gibbet Improvements Scheme (Application)
Application Reference: TR010044
Deadline 8

Please find, accompanying this letter, the Applicant's submission to the Planning Inspectorate for Deadline 8 of the Examination for the A428 Black Cat to Caxton Gibbet improvements. This is in accordance with the request set out by the Examining Authority in the Rule 8 letter dated 20 August 2021.

Document Reference	Document Title
TR010044/APP/2.6	Streets, Rights of Way and Access Plans (Tracked) (Rev 3)
TR010044/APP/2.6	Streets, Rights of Way and Access Plans (Clean) (Rev 3)
TR010044/APP/6.13	Biodiversity Pre-Commencement Plan (Rev 2)
TR010044/EXAM/9.4	Compulsory Acquisition Schedule (Rev 4)
TR010044/EXAM/9.6	Guide to the Application (Rev 6)
TR010044/EXAM/9.26	Scheme Design Approach and Design Principles (Rev 2)
TR010044/EXAM/9.48	Pre-Commencement Plan (Rev 3)
TR010044/EXAM/9.54	Barbastelle Bat Surveys and Mitigation Technical Note (Rev 4)
TR010044/EXAM/9.93	Applicant's Comments on Deadline 6 Submissions
TR010044/EXAM/9.94	Applicant's comments on submissions made at Deadline 6 by the British Horse Society
TR010044/EXAM/9.95	Applicant's Comments on the Biodiversity Technical Note [REP6-062]
TR010044/EXAM/9.96	Applicant's Comments on the Brief Feasibility Study for a new NMU link between St Neots and Cambourne
TR010044/EXAM/9.97	Applicant's Response to the Examining Authority's Third Round of Written Questions

Document Reference	Document Title
TR010044/EXAM/9.98	Applicant's Comments on the Report on Implications for European Sites
TR010044/EXAM/9.99	Habitats Regulations Assessment: Report to Inform Appropriate Assessment
TR010044/EXAM/9.100	Joint Position Statement on methodology, practicalities and the value of relocating Brook Cottages
TR010044/EXAM/9.101	Applicant's response to actions arising from ISH 4 on 30 November 2021, ISH 5 on 1 December 2021 and ISH 6 on 2 December 2021 where a response is required at Deadline 8
TR010044/EXAM/9.102	Results of additional VISSIM Modelling at M11 Junction 13
TR010044/EXAM/9.103	Applicant's comments on submissions made at Deadline 6 by Camcycle
TR010044/EXAM/9.104	Brook Cottages Heritage Strategy
TR010044/EXAM/9.105	Applicant's Responses to Issues Raised at Issue Specific Hearing 5 on 1 December 2021
TR010044/EXAM/9.106	Schedule of Changes to the First Iteration Environmental Management Plan

Submissions made at Deadline 7

We will be providing comments on the submissions made at Deadline 7 at Deadline 9 (25 January 2022) in accordance with the Examination Timetable. However, in response to an initial query from the Examining Authority regarding the submission made by Mr and Mrs Chamberlain [REP7-012] the Applicant's response to this is set out in Annex A of this letter.

The query relates to the submission made by Mr and Mrs Chamberlain [REP7-012] which sets out that they have two tenants whereas the Book of Reference [REP4-010] identifies one. The Examining Authority is seeking clarification of the Applicant's position on this matter.

Update on Protected Species Licence

Natural England (NE) provided a Letter of No Impediment (LONI) on the 13 January 2022 based upon the draft European Protected Species Licence (EPSL) (GCN: 2021-55718-EPS-AD1 - A428 Black Cat to Caxton Junction) submitted by the Applicant to NE on 26 November 2021 to mitigate the impacts of the Scheme on Great Crested Newts. The LONI is attached to this letter.

Update on Discussions with Cambridgeshire County Council (CCC) on Departures

We would like to make the Examining Authority aware that as part of detailed design development we are undertaking assessments, in accordance with the methodology agreed with CCC, to provide justification for the proposed geometric departures and provide an objective evaluation that will satisfy all parties.

The outcome will inform the development of the detailed design and form the basis of the technical justification. The outcomes to date have provided sufficient information to CCC that they have recognised the need for the departures. We are currently working together to refine the geometry and supporting information, which is predominantly driven by safety implications.

We trust that the above is clear but if you do have any questions, please do not hesitate to contact me using the details below.

Yours faithfully



Anne-Marie Rogers

Senior Project Manager for A428 Black Cat to Caxton Gibbet improvements scheme

Email: info@a428.co.uk

Tel: 0300 123 5000

ANNEX A – Response to the query from the Examining authority regarding the Deadline 7 submission made by Mr and Mrs Chamberlain [REP7-012]

A submission made by Mr and Mrs Chamberlain [REP7-012] at Deadline 7 sets out that they have two tenants whereas the Book of Reference [REP4-010] identifies one. The Examining Authority is seeking clarification of the Applicant's position on this matter.

Applicant's Position

On 8 March 2017 the Applicant sent Mr and Mrs Chamberlain a letter inviting them to a Preferred Route Announcement consultation, establishing the first contact. The first landowner meeting was on 25 October 2018.

As part of the Applicant's diligent enquiry to identify all land interests impacted by the Scheme, a Request For Information Form (RFI) (which specifically requested information regarding leasehold interests) was sent to Mr and Mrs Chamberlain on 27 February 2019 via post. A returned completed form was not received. There are no other interests noted on the freehold land registry title, or other leasehold titles registered on the land.

On 19 March 2019, the Applicant issued a chaser letter, requesting the RFI be completed and sent back to us. This prompted a response from Mr Chamberlain (confirming they had received the documentation via post), who rang Ardent on 20 March 2019 requesting the RFI form be re-issued. This was posted again and also emailed to Mr Chamberlain on 21 March 2019. This form was never returned to the Applicant.

The Applicant has had landowner meetings with Mr and Mrs Chamberlain on the following dates, where land interests were discussed but the Applicant was not made aware of any current tenants:

1. 29 May 2019
2. 11 June 2019
3. 9 December 2020
4. 26 August 2021

As a completed RFI from Mr and Mrs Chamberlain had not been received, the Applicant undertook desktop and site referencing, where the following interests were identified:

1. Trade Tints
2. Inks, Oils and Razorblades

Both parties were written to as part of the S42 consultation on 31 May 2019. Trade Tints subsequently confirmed they were no longer trading at that location (attached email) on 6 January 2020. Mr Cutter of Inks, Oils and Razorblades got in touch with the Applicant via the info@A428 email address on 12 November 2020 after receiving letters to the business address. The attached email indicates access to the property was made difficult, so Mr Cutter was unable to respond sooner. Mr Cutter also confirms in his email that he is the Chamberlains only long standing tenant.

The Applicant has continued to have ongoing communication with Mr and Mrs Chamberlain via phone and email, and additional tenants have never been mentioned.

The first indication there was a second tenant, was set out in a submission made by Mr and Mrs Chamberlain [REP7-012] at Deadline 7 and also highlighted in an email from The Planning Inspectorate Case Manager on 11 January 2022.

As the Applicant is now aware of this, Mr and Mrs Chamberlain were emailed on 12 January 2022, requesting they provide contact details for Mr Goodwin (email attached).

The Applicant will also update the following application documents: Book of Reference, Statement of Reasons Annex B, Schedule of Change) to include this new interest (with Name and address if provided by Mr and Mrs Chamberlain). These documents will be submitted on 15 February at Deadline 10.

Once we are in receipt of the full name and contact address of Mr Goodwin, we will write to him to advise of his rights to become an interested party and be involved in the examination process.

Naomi Kretschmer (Aecom)

From: Lee @ Trade Tints [REDACTED]
Sent: 06 January 2020 12:10
To: Laura Crumpton
Subject: RE: A428 - Black Cat

Good morning Laura,

No we are no longer at the address, we relocated due to the works that will be happening and didnt want to leave it until the last minute. We didnt want to leave but had no choice.

Kind regards,

Lee Birdsall

Trade Tints Ltd, Unit 7, Shuttleworth Court, Elms Farm Industrial Estate, Bedford. MK41 0EN.

Mob :: [REDACTED]

Email :: [REDACTED]

Web :: [REDACTED]



From: Laura Crumpton [REDACTED]
Sent: 03 January 2020 12:11
To: [REDACTED]
Subject: A428 - Black Cat

Afternoon Lee,

We are instructed on behalf of Highways England to engage with persons who have an interest in the land affected by the A428 improvement works.

Could you confirm for me whether you still have an interest in the unit at the Black Cat roundabout that has your signage on the side?

Many thanks
Laura

Working on behalf of Highways England

Highways England customer contact centre
0300 123 5000



Laura Crumpton BA Hons | Consultant
Ardent | Suite 41, 500 Avebury Boulevard, Milton Keynes,
MK9 2BE
Tel: [REDACTED] | Mobile: [REDACTED]
E: [REDACTED] | W [REDACTED]



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Naomi Kretschmer (Aecom)

From: Laura Crumpton (Aecom)
Sent: 12 January 2022 11:19
To: Antonia Pagonis
Subject: FW: Compulsary Purchase

External e-mail - Please think before clicking any links or opening attachments.

From: [REDACTED]
Sent: 12 November 2020 12:28
To: Info@a428.co.uk
Subject: Compulsary Purchase

Hi
My name is Stephen Cutter i have been the tenant at [REDACTED]
[REDACTED] since the 1st May 2013, my landlord/lady are Pat and Ken Chamberlain of Keen screen windows.
Initially they told us that they would make a claim for us but although this may possibly be the case it would seem they are now trying to force us out the premises so as maybe to avoid paying our compensation as obviously we have invested a lot of time and money creating our business there and will be in a situation of having to relocate.
I can only apologise for the late reply to your letter however they [REDACTED] changed the locks on the entrance/Exit gate so as to deny us entry, again and it may well be coincidence but we have been allowed entry after the date has passed, I would assume they have received the same letter as myself so would know the Date
Whilst speaking to the solicitor he was under the opinion that perhaps they had been made an offer from yourselves as i know they were keen to move but the offer included taking care of their only long standing Tenant myself, again i have no clarification of this.
I am more than willing to discuss have a video call with yourselves on this matter and of course have attached the consent form.
Id be grateful of any response to this matter and of course can provide hard copies for everything said above about no entrance etc should you require them.please could you send any more relevant information to my email above or indeed feel free to contact me on [REDACTED]
Kind regards
Steve Cutter.

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[REDACTED]**

Road Project: [REDACTED]

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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Naomi Kretschmer (Aecom)

From: Laura Crumpton (Aecom)
Sent: 12 January 2022 11:29
To: Antonia Pagonis
Subject: FW: A428 - Tenant details

External e-mail - Please think before clicking any links or opening attachments.

From: Laura Crumpton (Aecom)
Sent: 12 January 2022 10:29
To: Pat Chamberlain <[REDACTED]>
Subject: A428 - Tenant details

Dear Pat,

I hope this finds you well.

Following your response to the planning inspectorate at deadline 7 we have noted that there is a mention of another tenant, Mr M Goodwin. We need to contact them in order to allow them to be part of the DCO process as part of our requirements within this process. We were not aware of this tenant before as never received a completed request for information back from yourselves which were issued by post and via email on 21.03.19.

Would you possibly be able to provide the tenants full name and contact details (mailing address would suffice) so we can make contact with them?

Kind regards

Laura Crumpton
A428 – Black Cat to Caxton Gibbet Improvements
Land & Property | National Highways | Woodlands | Manton Lane | Bedford | MK41 7LW
Mobile: [REDACTED]
E-Mail: [REDACTED]

Working on behalf of National Highways

National Highways Customer Contact Centre - 0300 123 5000

[REDACTED]

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Date: 13 January 2022
Our ref: 2021-55718-EPS-AD1
(NATIONALLY SIGNIFICANT INFRASTRUCTURE
PROJECT)



Anne-Marie Rogers
Senior Project Manager National Highways

Sent by e-mail only

Wildlife licensing
Natural England
Horizon House
Deanery Road
Bristol
BS1 5AH
Email:

Tel: [REDACTED]

Dear Anne-Marie Rogers

DRAFT MITIGATION LICENCE APPLICATION STATUS: INITIAL DRAFT APPLICATION
LEGISLATION: THE CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017
(as amended)
NSIP: A428 Black Cat to Caxton Junctions.
SPECIES: Great Crested Newt

Thank you for your initial draft Great Crested Newt mitigation licence application in association with the above NSIP site, received in this office on the 26th of November 2021. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'letter of no impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

Assessment

Following our assessment of the submitted draft application documents, I can now confirm that, on the basis of the information and proposals provided, Natural England sees no impediment to a licence being issued, should the DCO be granted.

However, please note the following issues have been identified within the current draft of the method statement that will need to be addressed before the licence application is formally submitted. Our wildlife adviser, Jemima Dimpleby, discussed this matter with Stephanie Peay and Mary Maguire via teleconference correspondence on the 12th of January 2022 where it was confirmed that the necessary amendments would be made. Please do ensure that the Method Statement is revised to include these changes prior to formal submission.

A brief summary is included here, but the formal email signature is attached below for clarity.

- Include a Named Ecologist and experience.
- Confirm an update aquatic amphibian survey will take place to inform the formal application.
- Update justification and method statement in line with the discussion around receptor sites, and new pond locations as discussed.
- Provide further justification for Licensing Policy 1 as discussed.
- Provide further clarity and justification on trapping days per pond.

- Provide further justification and detail on monitoring scheme and maintenance as discussed.
- Conduct further minor tweaks to figures, work schedule and structure of method statement as agreed (addition of distances, labels, and features as discussed, plus breakdown of measures by population clusters).
- Confirm a walk over survey is conducted ahead of the formal submission.

Next Steps

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted.

If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.

Full details of Natural England's licensing process with regards to NSIP's can be found at the following link:

[REDACTED]

As stated in the above guidance note, I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely

Jemima Dimbleby

Tel: [REDACTED]

E-mail: [REDACTED]

Annex – List of minor issues

Dear Stephanie Peay and Mary Maguire

CC: Anne-Marie Rogers

Following the discussion with the ecologists associated with this application on 12/01/22, regarding the initial draft NSIP licence application relating to Great Crested Newts and the points outlined below, it has been confirmed that the following information will be included when the formal application for the above licence is submitted. If these issues are not addressed within the formal licence application this is likely to result in delays in Natural England being able to reach a licensing decision and the issuing of a licence, should the DCO be granted. Please note this document relates only to the method statement and supporting documents.

Changes to be made which would form part of the formal licence conditions when all three tests are met:

Application Form

Named Ecologist and their experience

Please ensure that a suitable named ecologist be in place for the formal submission. Please ensure that they demonstrate his/her experience with great crested newts (GCN) and cover the different licensable activities which form part of the licence application, with satisfactory references if required, within the formal submission.

Declarations

Please ensure that the Application form declarations are signed and dated by both the Applicant and the Named Ecologist.

Method Statement

During the formal submission, please ensure that all required information and supporting evidence to inform the assessment is provided in the Method Statement. Where additional information has been provided in separate documents and cannot be transferred directly into the Method Statement due to size, please ensure that this information is suitably signposted within the appropriate sections of the Method Statement.

C3.3 Habitat description – waterbodies or ponds

Please ensure that the distances from the development boundary to each waterbody are provided within the formal submission.

C3.4 Habitat description – terrestrial habitats

Please provide further clarification of the total area of the development site (ha). Within the Method Statement it is stated as 374.48 ha, however it is stated as 666.19 ha in additional supporting documents. Additionally, please ensure that all habitat type area values within the description provided are included and equate to the total area size (ha). Any clarification provided will aid the assessment of whether all habitats have been considered within impact tables.

C4.3 Aquatic amphibian survey

Please ensure that additional surveys are undertaken to inform the application for the formal submission, as stated within this pre-application Method Statement. The survey results from 2018 or 2019 and the updated eDNA surveys undertaken in 2021 provided help inform the application at this stage, however Natural England expects updated surveys, in accordance with the survey guidelines of the Great Crested Newt Mitigation Guidelines (GCNMG), to confirm the extent of GCN presence across the site before development works commence.

Please provide the survey data of any update surveys undertaken within the Method Statement of the formal submission, including date, air temperature, vegetation cover, turbidity conditions data. Please state any comments and constraints for the survey data and provide your ecological justification to support the results of the surveys to be undertaken.

Please ensure that a walkover survey is undertaken within three months before formal submission.

Section D – Impacts

It is noted that all ponds within the county of Bedfordshire are being considered for a separate District Level Licence application (Ponds 1-14, 19, 20, 21, 22, 23 and 85), and have not been included further within plans. These ponds therefore have not been considered further within the assessment of the Impact and Mitigation proposals for this EPS Mitigation licence pre-application. Please ensure that it is confirmed that a District Licence application to cover these has been these ponds has been accepted within the formal submission, particularly for ponds 5, 9, 12,13 and 14 where impacts are expected.

D2 Pre- and mid-development impacts

Please ensure that greater detailed descriptions of the permanent and temporary impacts from the development works are provided in the formal submission. In particular, information of the impacts expected in close proximity to GCN ponds would aid the subsequent assessment of whether the capture and exclusion measures proposed are suitable. As an example, further detail of what permanent impacts surround pond 83, or the temporary impacts immediately surrounding ponds 53 and 55, or pond 81, should be provided.

E2 Receptor sites

Please ensure that all proposed receptor sites and their information are included within the formal submission. Currently two receptor sites are stated within the Method Statement, however as shown in Figure E2-E4a, there are other receptor sites being implemented in the following locations: within existing woodland between ponds 38 and 44, two grassland receptor strips near ponds 53 and 55, one grassland receptor strip by pond 56, and a receptor site for ponds 81, 82 & 83 by a new pond to be created. All receptor sites should be included in this section of the Method Statement, with their grid reference, distances from development, ownership, habitat description, size (ha) and adjacent land use stated.

Please ensure that you provide further reasoning and justification for the choice of location for the following receptor sites:

- Receptor site for ponds 38 & 44 – this receptor site is in an area of woodland that is surrounded by permanent and/or temporary impacts. It is stated that the existing A428 presents a barrier to dispersal to GCN. Therefore, any GCN moved here may be at risk of isolation with no access to breeding ponds during the development works. Please provide

justification as to whether this has been considered within the receptor site selection, with reference the permanent and temporary impacts expected here.

- Receptor site for ponds 81, 82 & 83 – as discussed in our conversation, please provide clarification that this receptor site is not for the purpose of translocating GCN caught near ponds 81, 82 & 83 to. At present, labels on Figure E2-E4a suggest that any GCN caught near these ponds will be translocated over 500m away from ponds 81 and 82, and almost 500m away from pond 83, which could hold implications for the GCN population that already exists within this population cluster. Further information regarding where any GCN found within the areas surrounding these ponds will be translocated to, should be provided.

E3.1 – Habitat creation, restoration and enhancement of aquatic habitats

Please ensure that you provide further reasoning and justification for the choice of location for the following new ponds:

- New pond location by ponds 28 & 29 – please provide justification for the location of this pond in consideration of nearby existing GCN ponds and barriers to dispersal. Natural England would expect new ponds to be put where GCN are likely to find them, usually within 250m of an existing GCN waterbody. As the location of this new pond is over 250m away from an existing GCN population, and the location of the new A428 road is likely to present a barrier to dispersal to GCN accessing this pond from known populations, please provide your justification for the choice of location for this new pond. As discussed in our conversation, further clarification of whether this new pond is being created for existing populations or purely as a separate enhancement measure should be provided.
- New pond location by ponds 81, 82 & 83 – As discussed in our conversation, further clarification of whether this new pond is being created for existing populations or purely as a separate enhancement measure should be provided. Please provide justification for the location of this pond in consideration of nearby existing GCN ponds and barriers to dispersal.

Table E3.2 – Terrestrial habitat measures:

Please ensure that this information is provided within the table for the formal submission, as stated at this pre-application stage.

E3.3 Integration with roads and other hard landscapes

It has been noted and discussed in our conversation that the tunnels and underpasses proposed within this scheme are not specifically designed for great crested newts alone, therefore no further information is required. Please note that if these tunnels or underpasses are being specifically designed for the purpose of providing habitat connectivity for newts, then further design information on their length, width, height and any guide fencing employed should be provided within the formal submission.

Please ensure that further information regarding other integration measures such as dropped kerbs or gully pots are included in the Method Statement within the formal application. The document 'First Iteration of the Environmental Management Plan' Annex D – GCN states that modified kerbs and gully pot ladders will be installed and inspected annually during construction. If this is the approach that will be taken within the formal submission, please confirm whether the gully pots will be offset, and provide clarification of what is meant by modified kerbs. Inclusion of any relevant diagrams of design should be included within the formal submission.

E4 Capture, exclusion and translocation

Please ensure that the length of time for capture and exclusion periods for each GCN population cluster is stated within the Method Statement for the formal submission. The

approach that 30 days of trapping will be conducted for small population clusters, and 60 days for medium sized population clusters, is acceptable as this is in line with the GCNMG, however the different capture periods for each population cluster need to be clearly stated within the Method Statement.

Please ensure that the time length for hand and destructive searches is included within the Method Statement for the formal submission. Please also ensure that this correctly corresponds with the information provided in the Work Schedule.

Please ensure that the following concerns are addressed within the formal submission:

- Ponds 30, 31, 32, 33, 36, 37, 41A, B and C population cluster – please provide comment on whether the area subject to drift fencing could be compartmentalised rather than have open sections of fencing to the north, particularly as there is suitable hedgerow habitat along this area. Please also provide further details or justification as to whether a newt grid or similar will be placed at the gap in the semi-permanent fencing where the road is located.
- Pond 38 and 44 cluster – in relation to earlier comments regarding the location of the receptor site, please ensure that appropriate justification of how the current capture and exclusion proposal for this pond cluster is considered the most suitable within the formal submission.
- Ponds 53, 54, 55 and 58 cluster – Please ensure that further information is provided regarding whether current capture and exclusion proposal takes into account the temporary impacts immediately surrounding ponds 53 and 55 within the formal submission.
- Ponds 62 to 68 - It has been noted within the 'Pond Impact Assessment' document that 'Licensing Policy 1 (LP1) should be applied to these ponds'. At present there is not enough justification from the information provided to fulfil this approach. Please ensure that within the formal submission that greater justification is provided for applying LP1 to these ponds in respect of each of the following:
 - exclusion or relocation measures are not necessary to maintain the conservation status of the local population.
 - the avoid-mitigate-compensate hierarchy is followed.
 - compensation provides greater benefits to the local population than would exclusion and/or relocation.
- Pond 81 – Please ensure that further comment or justification is included within the formal submission as to whether the current extent of semi-permanent fencing is considered adequate to prevent GCN from entering the area of temporary impacts. Provide comment as to whether installing additional fencing on the east and west sides of the field margin has been considered necessary or not to prevent GCN entering the area of temporary impacts. An understanding of what temporary impacts will take place in the field surrounding this pond (see earlier comments) will help inform/justify the extent of fencing here.
- Ponds 82 and 83 – in relation to earlier comments regarding details of the impacts expected around these ponds, please ensure that further justification as to how the current location of the fence line is considered suitable to exclude GCN from impacts, is included.

E5.1 Habitat management and maintenance

Please ensure that information of how waterbodies will be managed and maintained is included within the Method Statement for the formal submission. Specific information has not been provided within the First Iteration Environmental Management Plan, therefore please ensure this is provided and is detailed within this section of the Method Statement.

E5.1 Post development population monitoring

Please ensure that the following is addressed within the Method Statement of the formal submission. It has been noted that the population monitoring proposal includes only the three ponds to be created and does not include the existing ponds subjected to the impacts of the development. Natural England would expect that population monitoring at both the existing and new waterbodies be undertaken unless appropriate justification is provided. Please note, it is particularly important for population monitoring to occur for the waterbodies subject to the higher levels of impacts, such as Ponds 83 and 82, to assess whether the GCN populations have been affected by the impacts of the development. Given the scale of the scheme, Natural England may accept that population monitoring be carried out at a selection of ponds rather than all, such as those with a higher risk of impact or a sample of ponds for each population cluster, as long as reasonable justification is provided within the formal submission.

Work Schedule

With regard to the information provided at this point in the pre-application stage, please ensure that the following are addressed within the formal submission:

- Please include the timing of and details for hand searches, in correspondence with the details provided in Section E4 of the Method Statement.
- Please ensure that Table E6b) Post development works within the Work Schedule is fully completed to show the years when population monitoring, habitat management and site maintenance will occur.

Figures

Figure E2-E4a – Please ensure that you submit these figures separately within the formal submission, as each are standalone licensable figures.

Figure E2 – Please ensure that this figure is submitted as a separate figure in the formal submission to show all receptor sites, with consistent colouring/shading to help their identification (e.g. at present some receptor sites are highlighted in dashed pink, whereas others are green with a text box labelled as ‘grassland receptor strips’).

Figure E3.1 – Please ensure that new ponds are individually labelled as ponds A, B or C, to correspond with the information provided in the Method Statement.

Figure E3.3 – Please ensure that all integration measures proposed are included and appropriately labelled within the formal submission. This includes any areas where dropped kerbs or gully pot measures are proposed.

Figure E4a – Please ensure that this figure is submitted as a separate figure in the formal submission, with an appropriate scale to include all ponds associated with capture and exclusion proposals (at present ponds 61 to 66 are not included within the figure). Please clearly indicate which ponds are subject to Licence Policy 1 where appropriate.

Figure E5.1 – Please ensure that this figure is submitted within the formal submission, as there are plans to manage and maintain habitats detailed within the First Iteration Environmental Management Plan. Please ensure that this figure specifically shows the measures for monitoring and maintenance of the created ponds and the terrestrial habitat measures that will be stated in Section E3.2.

Figure E5.2 – Please ensure that this figure is submitted within the formal submission to clearly show which waterbodies will be subject to post-development population monitoring.

The points raised above must be addressed in the Method Statement for the formal submission. Please read the comments carefully and address all of the issues raised. The formal submission should be presented in its entirety to include all maps, appendices, reports etc. Please ensure to modify figures and the Work Schedule (where necessary) to address any amendments or changes to the information proposed at the time of the pre-application assessment. All changes from the previously submitted documents should be clearly highlighted.

Additional Comments

The comments below are for information/advice only and are not considered mandatory for the formal application to be granted, however they may further aid the assessment of the formal submission, or should be taken into account within future applications:

- **Figure C3.2** - The planned location for the road extension has been included on this Figure, which makes it difficult to distinguish the extent of A428 road that exists currently from what the extension proposes. As this is not a licensable figure, amendment of this figure is not considered mandatory for the full licence application, but removal of the proposed layout may be helpful to understand what the current barriers to dispersal are.
- **Section C3.4** - Photographs of the terrestrial habitats have not been provided, however given the scale of the project, and that aerial shots of the development site have been provided, this is not considered necessary to be able to progress with the assessment. Provision of these may be beneficial for future applications.
- **Figure D** - The colours selected for the permanent and temporary impacts areas are slightly difficult to distinguish from each other and could be amended for the full application to aid assessment, however it is not deemed mandatory for the licence application.
- **Figure E3.1** - At present the inclusion of all radii around each GCN waterbody reduces the ability to see and understand the extent of habitat types to be created as part of the scheme. Although not mandatory, it would be beneficial to remove these radii for the formal application to aid assessment of the figure.

Annex - Guidance for providing further information or formally submitting the licence application.

Important note: when submitting your formal application please mark all correspondence 'FOR THE ATTENTION OF Katia Oddi and Jemima Dimbleby.

Submitting Documents.

Documents must be sent to the Natural England Wildlife Licensing Service (postal and email address at the top of this letter).

Changes to Documents –Reasoned Statement/Method Statement.

Changes must be identified using one or more of the following methods:

- underline new text/strikeout deleted text;
- use different font colour;
- block-coloured text, or all the above.

Method Statement

When submitting a revised Method Statement please send us one copy on CD, or by e-mail if less than 5MB in size, or alternatively three paper copies. The method statement should be submitted in its entirety including all figures, appendices, supporting documents. Sections of this document form part of the licence; please do not send the amended sections in isolation.

Customer Feedback – Wildlife Licensing

To help us improve our service please complete the following questionnaire and return to:

Wildlife Licensing Natural England, Horizon House, Deanery Road, Bristol, BS1 5AH.

or email to [REDACTED]

[REDACTED]



Natural England Reference Number (optional):	Please tick to indicate your role:	Consultant	<input type="checkbox"/>
		Developer (Applicant/Licensee)	<input type="checkbox"/>

1. How easy was it to get in contact with the Wildlife Management & Licensing team of Natural England?

Difficult (1)

 OK (2)

 Easy (3)

 Very Easy (4)

If 1 please specify who you initially contacted in relation to your issue/enquiry?

2. Please tell us how aware you were (BEFORE you contacted us) of wildlife legislation and what it does/does not permit in relation to your enquiry?

Unaware (1)

 Very Limited Awareness (2)

 Partially Aware (3)

 Fully Aware (4)

3. How would you rate the service provided by Natural England?

	<i>Poor</i> 1	<i>Fair</i> 2	<i>Good</i> 3	<i>Excellent</i> 4	<i>Not applicable</i>
Ease of completion of application	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advice provided by telephone (if applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Our web site (if applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Clarity and usefulness of published guidance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Helpfulness and politeness of staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advice and clarity of explanations provided during Method Statement assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Advice and clarity of explanations provided during Reasoned Statement assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Speed of process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overall service	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If 1 or 2 to any of the above please specify why:

4. Was your issue/enquiry resolved by the activity authorised under licence or advice provided by us?

Fully

 Partially

 Unresolved

If not fully resolved please state what you think could have been done instead (note legislation affects which actions can be licensed):

5. Was there a public reaction to any action taken under the licence or as a result of our advice?

Positive support

 No reaction

 Negative reaction

6. Would you use a fully online licensing service if it could be made available in the future?

Definitely

 Possibly

 Unlikely

 No

7. Do you have any further comments to make or suggestions for improving our service, if yes please specify (continue comments on an additional sheet if necessary). If you are happy to be contacted at a later date to explore possible improvement options, please tick this box and ensure your Natural England reference number is at the top of this page.

