

Appendix 13-PD-1: Consultation

Table of Contents

Appendix 13-PD-1: Consultation	1
1. Introduction	1
2. Scoping Opinion	1
3. References	17

Tables

Table 1: Scoping Opinion Responses	2
--	---

Appendix 13-PD-1: Consultation

1. Introduction

- 1.1.1 This Preliminary Environmental Information (PEI) Report appendix consolidates key comments raised in the Environmental Impact Assessment (EIA) Scoping Opinion (**Appendix 5-PD-2** in PEI Report **Volume 4**) from the Planning Inspectorate (PINS) and other consultees, such as Environment Agency, Natural England, Historic England, local planning authorities, in relation to terrestrial ecology.

2. Scoping Opinion

- 2.1.1 A scoping exercise was undertaken in March 2025 to establish the content of the assessment and the approach and methods to be followed.
- 2.1.2 The Scoping Report (**Appendix 5-PD-1**, in PEI Report **Volume 4**) was issued on (25 March 2025) and records the findings of the scoping exercise and details the technical guidance, standards, best practice and criteria to be applied in the assessment to identify and evaluate the likely significant effects of the Proposed Development on terrestrial ecology.
- 2.1.3 Following receipt of the Scoping Opinion on 08 May 2025 (see **Appendix 5-PD-2** in PEI Report **Volume 4**), the requirements summarised in **Table 1** have been identified by consultees in relation to terrestrial ecology.
- 2.1.4 **Table 1** outlines how and where these issues have been addressed within the PEI Report or will be addressed within the Environmental Statement (ES) to ensure they are taken account of as part of the ongoing assessment of effects on terrestrial ecology.

Table 1: Scoping Opinion Responses

Consultee	Topic	Summary of comment	How and where addressed
Planning Inspectorate	Indirect impacts to statutory designated nature conservation sites of international importance potential within zone of influence (Ensor's Pool and Chiltern Beechwood)	ID 3.6.1: The scoping report seeks to scope out effects on Ensor's Pool SAC/SSSI and Chilterns Beechwood SAC/SSSI during construction, on the basis that these sites are not hydrologically connected. On this basis the Inspectorate agrees to scope out effects on Ensor's Pool SAC/SSSI and Chilterns Beechwood SAC/SSSI, during construction and operation. The Inspectorate notes that the scoping report seeks to scope out Parts 2, 4a and 4b during construction but only Parts 2 and 4b in operation, therefore the ES should confirm that Part 4a is also to be scoped out for operation.	Indirect effects on Ensor's Pool and Chilterns Beechwood SAC/SSSI are Scoped out for Part 4a and 4b for the Proposed Development's operation, see Chapter 13: Ecology – Terrestrial in Volume 2 of this PEI report, sections 13.4, 13.11 and 13.12 for further details.
	Indirect effects on designated nature conservation sites due to disturbance of qualifying species during operation and maintenance. (All parts)	PINS ID 3.6.2: The scoping report seeks to scope out this matter on the basis that disturbance to qualifying features of statutory sites would be limited and unlikely to be significant. The scoping report also states that there are no statutory designated sites in close vicinity to Part 1a, 1b, 2 (pumping stations) and Part 4a. Whilst the Inspectorate notes that indirect during operation of the proposed development are not likely to have significant effects on designated sites, the	Given that the maintenance requirements of the pipelines and pumping stations are likely to be limited, the Scoping request sought to scope out indirect effects. Likely operational impacts, including disturbance from maintenance activities, on designated nature conservation sites and their qualifying ecological features have been assessed in Chapter 13: Ecology – Terrestrial in Volume 2 of this PEI report, sections 13.6, 13.7, 13.8, 13.9, 13.10 and 13.11 and will be fully assessed in the ES where likely significant effects may arise.

Consultee	Topic	Summary of comment	How and where addressed
		scoping report does not provide details of location, duration and type of maintenance activities. The Inspectorate therefore considers there is potential for disturbance during maintenance activities, and these should be assessed in the ES where likely significant effects may occur.	
	Indirect effects on non-statutory designated nature conservation sites due to disturbance of qualifying species during operation. (Parts 1b (pipeline) Part 3 and Part 4b)	ID 3.6.3: The scoping report seeks to scope this matter out on the basis that maintenance works would be ad hoc and limited. The scoping report states that there is no permanent operational noise or lighting associated with Parts 1b pipeline, 3 and 4b of the proposed development. Any maintenance works would be ad hoc and limited. As such, this impact pathway (and thus potential effect) has been scoped out for these parts of the proposed development. Whilst the Inspectorate notes that indirect during operation of the proposed development are not likely to have significant effects on designated sites, the scoping report does not provide details of location, duration and type of maintenance activities. The Inspectorate therefore considers there is potential for disturbance during maintenance activities, and	Given that the maintenance requirements are likely to be limited, the Scoping Opinion sought to scope out indirect effects. However, an assessment of indirect effects of these activities have been assessed in Chapter 13: Ecology – Terrestrial in Volume 2 of this PEI report and will be fully assessed in the ES. In this Chapter 13: Ecology – Terrestrial in Volume 2 of this PEI report, likely operational impacts are outlined in sections 13.6, 13.7, 13.8, 13.10 and 13.11 accordingly.

Consultee	Topic	Summary of comment	How and where addressed
		these should be assessed in the ES where likely significant effects may occur.	
	Permanent impacts to ancient woodlands during operation. (All parts)	ID 3.6.4: The scoping report seeks to scope out impacts on ancient woodland due to the nature of the operational and maintenance works of the proposed development. At this stage, with no information regarding the location, type or duration of operational or maintenance activities, the Inspectorate does not agree to scope this matter out. The scoping report identifies a number of areas of ancient woodlands close to or directly adjacent to the Order limits which may be affected by operational and maintenance activities. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.	Impacts on Ancient Woodland during operational and maintenance have been assessed in the PEI Report and will be fully assessed in the ES. This will focus on Ancient Woodland located close to the Preliminary Order Limits. In Chapter 13: Ecology – Terrestrial in Volume 2 of this PEI report, likely operational impacts are outlined in sections 13.8 and 13.21 of this chapter.
	Disturbance/ displacement of protected and notable species during operation (Parts 1b, 3 and 4b)	ID 3.6.5: The scoping report seeks to scope this matter out on the basis that there is no permanent operational noise or lighting associated with Parts 1b pipeline, 3 or 4b, and any maintenance activities will be ad hoc at limited. Paragraph 3.7.2 of the scoping report states that operational and	Impacts as a result of disturbance/ displacement of protected and notable species during operation has been assessed in Chapter 13: Ecology – Terrestrial in Volume 2 of this PEI report, in sections 13.7, 13.8, 13.9, 13.13, 13.17, 13.21 accordingly.

Consultee	Topic	Summary of comment	How and where addressed
		maintenance activities will be set out in the ES. At this stage, with no information regarding the location, type or duration of operational or maintenance activities, the Inspectorate does not agree to scope this matter out. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.	
	Identification of priority habitats and species	ID 3.6.6: The scoping report states that desk studies have included a review of the conservation status of habitats and species identified using local lists of priority species and habitats, however the scoping report does not identify the priority habitats and species relevant to the proposed development. The ES should ensure this detail is provided.	Surveys are ongoing for ecological receptors, including priority habitats and species, and the results will be presented within the ES.
	Study area	ID 3.6.7: The scoping report states that a study area of 2km for internationally and nationally designated conservation sites has been used for the terrestrial ecology assessment. This is extended to 30km for European sites designated for bats, 20km for birds and 10km downstream where a site has hydrological connectivity. The ES should	The ES will clearly define and justify the final extent of the study area with reference to the potential Zol, taking account of receptor/ impact pathways. Chapter 13: Ecology – Terrestrial in Volume 2 of this PEI report, set out Zol's in section 13.5.

Consultee	Topic	Summary of comment	How and where addressed
		clearly define and justify the final extent of the study area with reference to the potential Zol, taking into account any receptors where there is potential for hydraulic connectivity with the proposed site. Any use of professional judgement should be fully justified in the ES. Effort should also be made to agree the final study areas with relevant consultation bodies.	
	Air quality impacts on Chilterns Beechwood SAC/SSSI	ID 3.6.8: The scoping report considers impacts on Chilterns Beechwood SAC/SSSI through hydrological connectivity, however, emissions from air are not considered. The Inspectorate considers that potential impacts on Chiltern Beechwoods SAC/SSSI should be considered in relation to air quality as set out in ID ref 3.2.9 of this opinion.	Chapter 8: Air Quality and Odour in PEI Report Volume 2 considers the potential impacts of emissions to air on designated ecological sites. Chapter 13: Ecology – Terrestrial in Volume 2 includes an assessment of potential air quality impacts on designated sites, based on the information presented in the air quality assessment. Chilterns Beechwood SAC/SSSI has been scoped out for the Proposed Development's construction and operation effects, see Chapter 13: Ecology – Terrestrial in Volume 2 , section 13.4.
	Veteran trees	ID 3.6.9: The Inspectorate considers that in addition to identifying the location of ancient woodland, the ES should also identify the locations of veteran trees through appropriate desk and, where necessary, field based survey. The ES should assess the effects of the Proposed Development on	Ancient and Veteran trees will be identified, where access is possible, through Arboricultural survey. Results of these surveys will be included in the Arboricultural Impact Assessment and will be fully assessed in the ES.

Consultee	Topic	Summary of comment	How and where addressed
		veteran trees where significant effects are likely to occur.	
	Confidential annexes	ID 3.6.10: Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.	All confidential species information will be included in a confidential appendix to the ES and submitted alongside the DCO application.
	Avoidance of Ancient woodland direct impacts	ID 3.6.11: It is noted that the scoping report relies on the Ancient Woodland Inventory to identify ancient and veteran trees within the study area. Ancient woodlands smaller than 2 hectares are unlikely to appear on these inventories. The scoping report identifies loss of ancient trees or habitat degradation as impacts of	Natural England updated inventory of ancient woodland has been provided within Appendix 13-PD-2: Designated Sites in Volume 4 of the PEI Report and Figure 13-PD-3: Ancient Woodland in Volume 3 (data downloaded November 2025). A complete list of ancient woodland sites, including smaller sites between 0.25 ha and 2 ha, should be updated by Natural England in 2026 and will be included in the ES

Consultee	Topic	Summary of comment	How and where addressed
		the proposed development. The ES should assess likely significant effects on all relevant ancient woodland receptors; seek to avoid direct impacts on ancient woodland and veteran trees; and ensure that there is no increase in fragmentation of these habitats.	baseline data. Data will also be identified through Arboricultural survey. Results of these surveys and measures to avoided direct impacts or increased habitat fragmentation at Ancient Woodland and Veteran trees will be included in the Arboricultural Impact Assessment and will be fully assessed in the ES.
	Habitat Reinstatement	ID 3.6.12: The scoping report states that once the pipe is installed, the backfilled area will be reinstated to previous use with vegetation reinstatement taking place over the next planting season. The ES should explain what monitoring will be undertaken to ensure reinstatement of vegetation is successful.	A summary of management and monitoring plans are provided in the Preliminary Outline Construction Environmental Management Plan (OCEMP). Management and monitoring plans will be detailed in the Outline Construction Environmental Management Plan (CEMP) and the Outline Landscape Environmental Management Plan (LEMP) and submitted with the DCO application.
Environment Agency	American Mink	ID EA-77: American mink, a key threat to water voles, were recorded along the canal network. To protect water vole populations during construction, the applicant should include mink management within the INNS Management Plan.	An Outline INNS Management Plan will be developed to ensure that the construction of the Proposed Development does not aid the spread of protected species and incorporates proportionate mitigation. The content of the Outline INNS management plan will be developed as the EIA progresses and will be discussed with the EA as part of ongoing engagement. The Outline INNS management plan will be submitted with the DCO application. In addition, American mink trapping is being developed as part of a Project-wide water vole mitigation strategy.

Consultee	Topic	Summary of comment	How and where addressed
Environment Agency	BNG Opportunities	ID EA-78: The applicant has completed a BNG baseline assessment but has not committed to delivering BNG or specifying a target. While not yet mandatory for NSIPs, delivering at least 10% BNG is emerging best practice. The ES should consider committing to this and explore opportunities via the Water Framework Directive and Local Nature Recovery Strategies.	Appendix 13-PD-6: Biodiversity Net Gain Statement provided in Volume 4 sets out that the Applicant is aiming to achieve 10% net gain.
Chilterns Conservation Board	Chalk grassland and chalk streams	ID CCB-2: Error! Reference source not found. references statutory sites and Part 4(b) including the Chilterns National Landscape but omits Chilterns Chalk Streams and Chalk Grassland habitats. CCB requests that the Chilterns National Landscape's ecology be explicitly included in the baseline assessment.	Chapter 13: Ecology – Terrestrial in Volume 2 considers specific impacts on the Chalk Grassland habitat, and other notable habitats within the Chilterns National Landscape. Chapter 12: Ecology - Aquatic in PEI Report Volume 2 considers impacts on Chilterns Chalk Streams, such as the River Ouzel, section 13.6.
Forestry Commission	Ancient woodland	ID FC-1: Ancient woodlands are irreplaceable habitats with high biodiversity value, protected under national policy which requires avoiding or mitigating negative effects, including through buffer zones (typically 15 m or more) to prevent damage. The ES should assess all direct and indirect impacts, including pollution and hydrological changes, and detail measures to minimize harm during construction.	An Arboricultural Impact Assessment will be included in the ES, to outline the expected impact on trees likely to be affected by the Proposed Development. In addition, the assessment of effects on ecology within Chapter 13: Ecology – Terrestrial in Volume 2 and the ES will consider impacts on Ancient Woodland and Ancient and Veteran trees, as irreplaceable habitats. Chapter 13: Ecology – Terrestrial in Volume 2 , section 13.6 includes reference to the tree buffer zone.

Consultee	Topic	Summary of comment	How and where addressed
Forestry Commission	Priority Habitat Inventory: mixed deciduous woodland	ID FC-2: Mixed deciduous woodlands within the scoping area are Priority Habitats under the NERC Act 2006 [Ref. 1] and remain a conservation focus due to their vulnerability. They face major threats from habitat fragmentation and nearby development, which can damage soils, roots, and drainage, and increase pollution, especially during construction.	Impact on priority habitats have been scoped in and therefore considered as part of the assessment of effects on terrestrial ecology, please see Table 13-4 in Chapter 13: Ecology – Terrestrial in Volume 2 . Priority Habitats have been considered as appropriate through the ongoing development and design of the Proposed Development, and where possible woodlands have been avoided see Chapter 13: Ecology – Terrestrial in Volume 2 section 13.6.
Forestry Commission	Net Loss of Woodland	ID FC-3: The Scoping Report identifies likely permanent loss and degradation of priority woodlands, and impacts on wet woodland from water changes. National policy requires retaining trees where possible, assessing all impacts, and using buffers, mitigation, and compensation to avoid net deforestation and protect habitat connectivity.	Impacts on trees will be avoided where possible. Environmental buffers have been utilised in defining the pipeline corridors for Part 1a and Part 4b and have sought to avoid trees and woodland where possible. The impact of the Proposed Development on woodland has been assessed in the PEI Report and will remain a consideration of the design, as this progresses up until a DCO application is submitted. Within the ES, avoidance measures and the mitigation hierarchy will be used appropriately to minimise any risk of net deforestation and overall connectivity between woodlands affected by the development.
Forestry Commission	Mitigation measures and enhancement opportunities	ID FC-4: The Forestry Commission encourages early engagement to help set effective, proportionate mitigation and enhancement measures. Priorities include	The Applicant will engage as appropriate with the Forestry Commission regarding Arboriculture, mitigation and enhancement, as part of post

Consultee	Topic	Summary of comment	How and where addressed
		protecting and improving ancient woodland, enhancing ecological connectivity through woodland creation (in 5 ha blocks where possible), using nature-based solutions, and increasing tree canopy cover in line with national targets.	Phase Two Public Consultation design development.
Forestry Commission	Mitigation measures, management and enhancement opportunities	ID FC-5: The Forestry Commission stresses that tree planting should be integral to all developments, not just for compensation. New planting must consider climate resilience, biosecurity, and long-term management, with species choice and provenance carefully planned. A UK Forestry Standard-compliant management plan is recommended, including pest control and access for ongoing care.	The Applicant will engage as appropriate with the Forestry Commission regarding Arboriculture, mitigation and enhancement, as part of post Phase Two Public Consultation design development.
Natural England	Priority habitats and Species	ID NE-10: Priority habitats and species, listed under Section 41 of the NERC Act 2006 [Ref. 1], are key for conservation and must be identified through habitat and species surveys. Brownfield sites may also hold high ecological value and should be assessed. The ES must detail all relevant habitats and species, potential impacts, mitigation, and opportunities for biodiversity gain, including consideration of sensitive aquatic species.	Ecological surveys are underway and will continue into 2026. Where appropriate, priority habitats and species will be surveyed, and will be assessed in the ES, Chapter 13: Ecology – Terrestrial in Volume 2 section 13.25. Where possible the impact to priority habitats and species are considered in Chapter 13: Ecology – Terrestrial in Volume 2 . This assessment is based on the desk study and what survey information is currently available.

Consultee	Topic	Summary of comment	How and where addressed
Natural England	Ancient woodland, ancient and veteran trees.	ID NE-11: The development route passes through or near ancient woodland, an irreplaceable habitat protected under the NPPF, which requires refusal of development unless there are wholly exceptional reasons and compensation. The Environmental Statement must assess impacts on ancient woodland and ancient/veteran trees, explore mitigation and enhancement, and consider a 200 m study area for hydrology-related effects.	An Arboricultural Impact Assessment will be undertaken, and submitted with the DCO application, to outline the expected impact on trees likely to be affected by the Proposed Development. Environmental buffers have been utilised in defining the pipeline corridors for Part 1b and Part 4b and have sought to avoid Ancient Woodland and Ancient and Veteran trees where possible. As detailed in National Policy Statement for Water Resources Infrastructure (NPSWRI) [Ref. 2], the assessment of effects on ecology will consider impacts on Ancient Woodland and Ancient and Veteran trees, as irreplaceable habitats. As the design of the Proposed Development progresses the consideration of Ancient Woodland and Ancient and Veteran trees will remain a key design consideration. Strategies for reducing impacts to Ancient Woodland and Ancient and Veteran trees, including establishing protection zones and alternative construction measures will be developed and detailed in construction and operational management plans, for submission in the ES with the DCO Application. Chapter 13: Ecology – Terrestrial in Volume 2, section 13.3 confirms the study area of 200 m will be assessed in the ES, for impacts to ancient

Consultee	Topic	Summary of comment	How and where addressed
			woodlands and ancient /veteran trees from hydrology related effects.
Natural England	Biodiversity net gain	ID NE-12: Under the Environment Act 2021 [Ref. 3], NSIPs must deliver at least a 10% Biodiversity Net Gain (BNG) from November 2025. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025. Developers should assess biodiversity across the entire red line boundary, follow established BNG principles and metrics, and secure gains for at least 30 years with adaptive management, embedded in the Development Consent Order (DCO).	Appendix 13-PD-6: Biodiversity Net Gain Statement in Volume 4, outlines that the Applicant is aiming to achieve 10% net gain. Currently, as set out within Appendix 13-PD-6, the proposed approach is to exclude temporary impacts from the BNG assessment, as this will allow for a proportionate approach to BNG for a project of this larger-scale. The approach to exclude temporary impacts will be revised if necessary to be in line with the forthcoming Defra mandate on BNG for NSIPs [Ref. 5].
Natural England	Biodiversity net gain	ID NE-3: The assessment should consider potential impacts on nature conservation sites and features, as well as opportunities for biodiversity net gain and nature recovery. Ecological Impact Assessment (EcIA), guided by CIEEM [Ref. 4], identifies and evaluates ecological impacts and may support EIA or other environmental assessments.	The assessment presented within Chapter 13: Ecology – Terrestrial in Volume 2 has considered direct and indirect impacts on relevant European, Statutory and Non-Statutory designated ecological sites. This assessment will be updated at the ES stage in accordance with design progression and the implementation of BNG for NSIP's, which was delayed from November 2025 and is proposed by DEFRA's to go live from May 2026.
Natural England	Impacts to statutory designated nature conservation sites	ID NE-4: The Environmental Statement must assess potential direct and indirect impacts on nationally and internationally designated nature conservation sites, including SPAs, SACs, and Ramsar sites. This should follow	The assessment presented within Chapter 13: Ecology – Terrestrial in Volume 2 , has considered direct and indirect impacts on relevant European, Statutory and Non-Statutory designated ecological sites. This assessment will

Consultee	Topic	Summary of comment	How and where addressed
		the NPPF's 'avoid, mitigate, compensate' hierarchy, with emphasis on minimising unavoidable impacts.	be updated at the ES stage in accordance with design progression. The NPSWRI is the relevant national policy document that the Proposed Development will be considered against. However, the requirements of the NPPF will also be considered, where appropriate.
Natural England	Impacts to regionally and locally important nature conservation sites	The development may impact several Sites of Special Scientific Interest (SSSIs), which must be assessed in the Environmental Statement. Any omissions, such as Griff Hill Quarry SSSI and Bugbrooke Meadows SSSIs, should be justified or included, especially where there are potential hydrological or ecological links. Sites potentially affected include: River Mease SSSI, Humber Estuary SSSI, Upper Nene Valley Gravel Pits SSSI, Ensor's Pool SSSI, Chilterns Beechwoods SSSI, River Blythe SSSI, Middleton Pool SSSI, Lockington Marshes SSSI, Attenborough Gravel Pits SSSI, Holme Pit SSSI, Mother Drain - Misterton SSSI, Whitacre Heath SSSI, Kingsbury Wood SSSI, Bentley Park Wood SSSI, Griff Hill Quarry SSSI, Bugbrooke Meadows SSSI and Boon's Quarry SSSI.	In line with the criteria set out in Chapter 13: Ecology – Terrestrial in Volume 2, section 13.4, statutory designated nature conservation sites, including those listed, were considered for inclusion in the baseline data. Where appropriate, SSSI's to a distance of 10 km downstream and ground water dependant terrestrial ecosystems (GWDTE) associated with SSSI's with connection to the Proposed Development have been included in Appendix 13-PD-2: Designated Sites in Volume 4 of this PEI Report. Impacts to statutory designated sites have been assessed in the PEI Report and will be fully assessed in the ES. Geological sites, such as Griff Hill Quarry SSSI and Boon's Quarry SSSI, are not within the scope for terrestrial ecology, see. Where appropriate Geological sites assessed in Chapter 14: Ground Conditions in PEI Report Volume 2.

Consultee	Topic	Summary of comment	How and where addressed
Natural England	Impacts to regionally and locally important nature conservation sites	ID NE-6: The applicant has considered regionally and locally important sites, and the Environmental Statement should detail mitigation, compensation (if needed), and opportunities for ecological enhancement and connectivity. These measures may also support wider environmental benefits.	The assessment presented within Chapter 13: Ecology – Terrestrial in Volume 2, has considered direct and indirect impacts on relevant European, Statutory and Non-Statutory designated ecological sites. As ecological surveys are still ongoing and as the design is still progressing, mitigation, compensation and opportunities for enhancement and connectivity are still being reviewed. The ES will provide more detail on these matters and will be submitted with the DCO Application. Ecological surveys are ongoing, see section 13.4 of Chapter 13: Ecology – Terrestrial in Volume 2 and discussions with Natural England regarding licence requirements and approach are currently ongoing.
Natural England	Protected Species and Letter of No Impediment (LONI)	ID NE-7: Applicants should determine if a wildlife mitigation licence is needed using Natural England guidance and may use the Pre-Submission Screening Service to obtain a Letter of No Impediment (LONI) for DCO applications. Ecological surveys must be carried out by qualified ecologists at appropriate times, following current guidance, with results and mitigation included in the Environmental Statement. Updated protected species advice (April 2025) should be referenced and used throughout the assessment process.	
Natural England	Protected Species: Water vole	ID NE-8: Natural England has raised concerns about potential impacts on water vole populations along the Grand Union Canal route. Survey methods should follow current guidance, as eDNA alone is insufficient. Further surveys may be needed depending on project timing. Capture should be a last resort, with priority given to alternative mitigation. Suitable, connected	The design of the Proposed Development is still in progress, and therefore, environmental mitigation measures are yet to be fully confirmed. However, conversations with Natural England to explore possible mitigation approaches in relation to Water Vole are ongoing. As the Proposed Development's design progress, mitigation measures will be developed and will be reported into the ES, which will be submitted with the DCO

Consultee	Topic	Summary of comment	How and where addressed
		mitigation areas must be in place before impacts occur, and Natural England encourages continued engagement on this issue. Standard Advice for protected species has been updated (April 2025) and guidance for species used for subsequent baseline ecological surveys and further assessments undertaken.	Application. Engagement with Natural England will continue throughout the EIA. Updated protected species standing advice guidance noted.
Natural England	Other protected species and surveys	ID NE-9: Natural England recommends expanding the 2 km desk study area in Error! Reference source not found. to account for international sites and species-specific behaviours, such as foraging and upstream/downstream impacts. Ecological assessments should align with current guidance and be based on the Zone of Influence to capture all potential indirect disturbances.	Chapter 13: Ecology – Terrestrial in Volume 2 of the PEI Report, section 13.4 explains that the scale of the desk-based assessment's study areas varies dependent upon the ecological feature being assessed and its vulnerability to change resulting from construction and operation of the Proposed Development (the predicted Zol). The Study Area for statutory sites has been increased to 10 km following Scoping Opinion.

3. References

- Ref. 1 Natural Environment and Rural Communities Act 2006. Available at: <https://www.legislation.gov.uk/ukpga/2006/16/contents> [Accessed 05/02/2026].
- Ref. 2 Department for Environment, Food & Rural Affairs (DEFRA) (2023). National Policy Statement for Water Resources Infrastructure (NPSWRI) (2023). Available at: <https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97/contents> [Accessed 05/02/2026].
- Ref. 3 Environment Act 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents> [Accessed 05/02/2026].
- Ref. 4 Chartered Institute of Ecology and Environmental Management (CIEEM) (2024). Guidelines for Ecological Impact Assessment (EcIA). Available at: <https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/> [Accessed 05/02/2026].
- Ref. 5 DEFRA (2025) Biodiversity net gain for nationally significant infrastructure projects. Available at: [Biodiversity net gain for nationally significant infrastructure projects - GOV.UK](#) [Accessed 05/02/2026]