

# Outer Dowsing Offshore Wind

## (Draft) Statement of Common Ground with Natural England

### Appendix H

Date: April 2025

Document Reference: 18.14

Revision: 1.0





Company:		Outer Dowsing Offshore Wind		Asset:		Whole Asset	
Project:		Whole Wind Farm		Sub Project/Package:		Whole Asset	
Document Title or Description:		Statement of Common Ground with Natural England					
Internal Document Number:		PP1-ODOW-DEV-CS-STA-0058		3 <sup>rd</sup> Party Doc No (If applicable):		N/A	
Rev No.	Date	Status / Reason for Issue	Author	Checked by	Reviewed by		Approved by
1.0	April 2025	Deadline 6	SLR /GoBe	Outer Dowsing	Shepherd and Wedderburn		Outer Dowsing

The Applicant initially prepared this Statement of Common Ground (SoCG) in November 2024. Due to resource constraints, Natural England advised the Applicant they were not able engage with the Applicant in relation to a SoCG until the last examination deadline (Deadline 6). Following further engagement with Natural England, it was agreed that the Applicant would revise the format of the SoCG to follow that preferred by Natural England and issue the document to Natural England for review week commencing 24th March 2025. The Applicant issued this SoCG to Natural England on the 25<sup>th</sup> March 2025. Where further engagement has been undertaken between Natural England and the Applicant and subsequent amendments have been made to relevant plans, additional text has been inserted to clarify the updated position. Natural England advised the Applicant it would not be able to review the SoCG. This draft SoCG is provided as issued to Natural England on 25<sup>th</sup> March 2025

## Annex H: Onshore Ecology and Ornithology

### 1.1 Onshore Ecology

1. The Applicant has considered the potential impacts of the Project from the MLWS along the Onshore Export Cable Corridor (ECC) and the Onshore Substation (OnSS) on onshore ecological receptors during the construction, operation and maintenance and decommissioning phases as outlined in Chapter 21 Onshore Ecology.

ID	Applicant's Position	Natural England's Position	Position Summary
Mitigation			
	The Applicant has set out sufficient mitigation measures within the outline CoCP to mitigate the risk to groundwater at Sea Bank Clay Pits SSSI. Details of this mitigation were provided at DL4 and the Applicant awaits confirmation from Natural England that this matter can be considered resolved.		
	The Applicant has secured the commitment to monitor Sea Bank Clay Pits SSSI during construction to avoid dewatering within the outline Code of Construction Practice which is secured via DCO Requirement 18 (2) (j). This requirement also commits the Applicant to consult with Natural England on the development of water quality management and mitigation plan as the relevant Statutory Nature Conservation Body.	Natural England is satisfied that the production of the water quality management and mitigation and Natural England's involvement in its production will be sufficient to mitigate the risk to groundwater at Sea Bank Clay Pits SSSI.	
	<b>Bats</b> The Applicant has provided further clarification on proposed bat mitigation within the OLEMS that was updated at Deadline 4 to include changes proposed by Natural England.	Natural England is satisfied with the approach, stating that mitigation measures presented by the Applicant are consistent with expected best practice and recommended ecological guidelines. NE considers this issue resolved.	

	Should a need for a licence for bats subsequently be identified the Applicant has agreed to engage with Natural England through the LoNI process.		
	The Applicant provided further clarification at Deadline 4, ensuring that any areas not previously surveyed, which have habitat suitable for roosting, foraging, or are integral to connectivity, will have the appropriate level of surveys undertaken before conclusions on impacts and licence requirements are made. Should the need for a licence be identified during these pre-commencement surveys, the Applicant has agreed to engage with NE through the LoNI process.	NE is satisfied with the approach, stating that the LoNI process should be used if pre-commencement surveys reveal that a licence to disturb bats is required. NE considers this issue resolved.	
	<b>Badgers</b>  The Applicant updated the OLEMS at Deadline 3 to include commitments to territorial analysis using the bait marking method if a main sett is identified as likely to be impacted during pre-construction surveys.	NE are satisfied with this approach which has been secured within the OLEMS and consider the outstanding issue has been resolved.	
	The Applicant has provided additional clarification within the OLEMS at Deadline 4 that construction of artificial badger setts must be complete prior to the exclusion works and there should be evidence that the badgers have found the sett	NE are satisfied with this approach and consider the outstanding issue has been resolved.	
	The Applicant considers sufficient information has been provided regarding pre-construction surveys and licensing for badger setts. The Applicant is committed to undertaking preconstruction surveys for badgers and will engage with NE through the LoNI process if the need arises.	NE have agreed to the pre-construction surveys outlined within the OLEMS and state that should the need for licences for impacts to badgers be identified as a result of those pre-construction surveys, they encourage the Applicant to engage through the LoNI process. NE consider this issue to be resolved.	
	<b>Reptiles</b>	Natural England has issued a GCN LoNI and considers this issue to be resolved.	

	<p>The Applicant has conducted sufficient surveys to establish a robust baseline for Great Crested Newts (GCN).</p> <p>The Applicant considers the mitigation measures set out in the OLEMS to be in accordance with the LoNI.</p>		
	<p>The Applicant has committed to and secured further pre-construction surveys for reptiles within the OLEMS.</p>	<p>NE is satisfied with the Applicant's updates to the OLEMS are in accordance with NE's Standing Advice and considers this issue resolved.</p>	
	<p><b>Otters</b></p> <p>The Applicant has found there to be no current predicted impact on otter and therefore has not applied for a LoNI. However, they recognise the for two otter holts to be present and have set out additional pre-construction surveys to include detailed field survey and camera trap monitoring of the holts. These additional commitments are outlined in Annex A.4.4 of the OLEMS submitted at Deadline 5. With these additional measures in place, the Applicant is hopeful that agreement with NE has now been reached and are awaiting confirmation of this.</p>	<p>NE have expressed concerns over risks to the two potential natal holts and have requested that robust pre-construction surveys be undertaken.</p> <p>NE are reviewing the information and amendments submitted by the Applicant within the OLEMS at Deadline 5.</p>	
	<p><b>Water Vole</b></p> <p>The Applicant has prepared a draft licence application for NE where impacts on water vole cannot be avoided, as per the OLEMS (Document 8.10).</p> <p>The Applicant considers the mitigation measures set out in OLEMS to be in accordance with the LoNI.</p>	<p>Natural England has issued a water vole LoNI and considers this issue to be resolved.</p>	
	<p>The Applicant has conducted sufficient surveys to establish a robust baseline for Great Crested Newts (GCN).</p> <p>The Applicant considers the mitigation measures set out in the OLEMS to be in accordance with the LoNI.</p>	<p>Natural England has issued a GCN LoNI and considers this issue to be resolved.</p>	

	The Applicant has included an appropriate commitment that the final Pollution Prevention and Emergency Incident Response Plan will identify and include sensitive ecological receptors including the Sea bank Clay Pits SSSI and it's features within updates to the CoCP at Deadline 6. On this basis it is considered that agreement will be reached between Natural England and the Applicant at Deadline 6.	Natural England has advised that the Applicant commits to including Sea bank Clay Pits SSSI and it's features as sensitive ecological receptors in the Final PPEIRP.	
	The Outline Public Access Management Plan is appropriate and the PAMP is secured by an appropriate requirement within the DCO.	Agreed. NE notes that an Outline PAMP has been submitted into examination.	
	The Applicant has agreed to following NE's Standing Advice regarding ancient and veteran trees. This is secured in the OLEMS.	NE is satisfied that their Standing Advice will be followed and considers any outstanding issues have been resolved.	
	The OLEMS includes appropriate measures for managing impacts on local designated sites, their designated features and any functionally linked land.	NE are satisfied that Biodiversity Awareness Training includes designated sites and functionally linked land. NE consider any outstanding issues have been resolved.	
Assessment Methodology			
	Assessment of the Sea Bank Clay Pits SSSI has been included within the updated ES Chapter 26 (document reference 6.1.26) submitted into the examination at Deadline 4a.	Natural England have advised this is acceptable and any outstanding issues have been resolved.	
	The Applicant is confident that all noise-sensitive features if ecological receptors have been clearly identified and monitoring has been targeted where considered necessary. All ecologically sensitive receptors and functionally linked land have been assessed in Chapter 22 Onshore Ornithology (document 6.1.22) and Chapter 26 Noise and Vibration (document 6.1.26).	Agreed	

## 1.2 Onshore Ornithology

2. The Applicant has considered the potential impacts of the Project landward of Mean High Water Springs (MHWS) on onshore ornithology during the construction, operation and maintenance and decommissioning phases as outlined in Chapter 22 Onshore Ornithology,

ID	Applicant's Position	Natural England's Position	Status
Baseline Data			
	The Applicant has presented the review and analysis of two complete years of survey data within their conclusions.	Natural England have acknowledged this is sufficient and any outstanding issues have been resolved.	
	The Applicant has presented sufficient detailed data and discussion on potential cropping management practices for functionally linked land (FLL).	Natural England have acknowledged this is sufficient and any outstanding issues have been resolved.	
	The Applicant's assessment of the potential noise disturbance responses of designated species is robust.	Natural England have acknowledged this is sufficient and any outstanding issues have been resolved.	
	The Applicant has provided sufficient evidence proving successful trenchless crossing on each proposed location. Alternative mitigation measures will be provided in the final code of construction practice if deemed necessary	Natural England continues to advise that a commitment is made by the Applicant to seek alternative mitigation if trenchless techniques are not appropriate.	
Assessment Methodology			
	Chapter 22 Ornithology presents a robust assessment of FLL and includes appropriate mitigation for fields used by brent geese and lapwing.	Natural England has advised that "while the Applicant has used their own survey data to assess FLL in ES Chapter 22, and included mitigation where fields are used by brent geese or lapwing, Natural England is satisfied this approach is acceptable for this projects assessment of ornithological features and the bird usage of functionally linked land" and outstanding issues have been resolved.	
	The Applicant has identified and assessed the designated bird features of The Wash SSSI, SPA, and Ramsar impacted by noise pollution, including FLL, from construction and decommissioning.	Natural England have advised that they would have preferred to have seen noise contour mapping, however the use of the threshold to derive a set back distance is acceptable and outstanding issues have been resolved.	
	The Applicant considers that sufficient information has been provided to justify their position and seeks further		

	engagement to discuss the issue. All ecological sensitive receptors and FFL have been appropriately assessed in ES Chapter 26 and Chapter 22.	Natural England have stated that “Whilst this is not our preferred approach, this is acceptable and appropriately justified within ES Chapter 26 v2 [APP-081]” and	
	The Applicant reviewed noise impact magnitudes for construction and operation, considering thresholds for ecological sites' features, and believes sufficient information justifies their position. They seek further engagement to discuss the issue, with all sensitive receptors assessed in ES Chapters 26 and 22.	“Whilst the Applicant has not modelled the noise levels in line with Natural England guidance, they have looked at the designated sites and the use of FLL by different species and included mitigation in the form of timing of works within ES Chapter 22. As such, Natural England is satisfied with the Applicant’s conclusions in this instance” and outstanding issues have been resolved.	
	The Applicant provided sufficient information to justify their position on noise impact assessment for Sea Bank Clay Pits SSSI, including a construction noise assessment in ES Chapter 26.		
	All ecologically sensitive receptors and functionally linked land have been assessed in Chapter 22 Onshore Ornithology (document 6.1.22) and Chapter 26 Noise and Vibration (document 6.1.26) and appropriate mitigation measures identified and included within the NVMP.	Natural England have stated that although ES Chapter 26 v2 [APP-081] does not include FLL as an ecological receptor, they are satisfied that FLL is considered in ES Chapter 22 Onshore Ornithology, including mitigation measures. They also point out that ES Chapter 22 sets out that there will be seasonal restriction to avoid works within 400m of core areas used by brent geese at the Haven. Based on this, and the NVMP, Natural England is satisfied that noise disturbance to birds using the Haven area will be avoided and outstanding issues have been resolved.	
	The Applicant has calculated that the standoff distances provided for the AGTAG09 $L_{Aeq, 1-hour}$ limit are also adequate for the AQTAG09 $L_{Amax}$ limit.	Natural England have stated that they are satisfied with the Applicant's conclusions in this instance and outstanding issues have been resolved.	
	The Applicant provided justification for not including the National Grid Grimsby to Walpole project due to insufficient information and submitted an addendum for the Viking Carbon Capture and Storage pipeline, confirming no change to assessment conclusions. The Applicant have addressed	Natural England have requested that for completeness the Viking Carbon Capture and Storage pipeline is included in Table 7.9 (Screening) and outstanding issues have been resolved.	



	Natural England's additional request in the Deadline 6 submission.		
	The Applicant has noted that IRZs don't specify areas of known FLL and conducted two years of surveys for wintering birds within the Order Limits plus a 400m buffer.	Natural England have acknowledged that surveys have been undertaken and can be used to identify appropriate avoidance, mitigation and compensation measures. The approach has been agreed with Natural England and therefore the issue can be resolved.	
<b>Mitigation</b>			
	<p><b>Pink-footed Goose.</b></p> <p>The OLEMS (Document 8.10) includes sufficient information on overwintering pink-footed goose and sets out robust mitigation measures for this species using FLL. Natural England's outstanding concerns have been addressed in the Deadline 6 submissions.</p> <p>The Applicant has responded to Natural England's comments as outlined in Appendix I3 submitted at Deadline 5 and expect that this issue should now be resolved.</p>	Natural England expect to be in agreement with the Applicant by the end of examination providing their outstanding concerns as detailed in Appendix I3 are addressed.	
	Sufficient information on the methods for reinstating topsoil and cover crops to minimize temporary loss of functionally linked land is presented in the outline Soil Management Plan (Document 8.1.3). Measures for mitigation for pink footed geese set out in the OLEMS include measures such as altering farming practices, however firm commitments cannot be made until the Applicant has finalised detailed design together with the construction programme and has an understanding of crop locations at the time.	Issue progressed.	
	The Applicant's proposed additional mitigation measures to reduce potential noise disturbance at the landfall	Issue resolved. Natural England advise that further efforts should be made in the final OLEMS to exhaust all options designed to minimise disturbance from these activities.	

	construction of the noise bund are appropriate and sufficient.		
	The commitment to a pre-construction survey for brent geese around the Haven crossing area , as per the Outline Landscape and Ecological Management Strategy (OLEMS) (Document 8.10), is appropriate.	Natural England have advised this issue has been resolved.	
	Amendments have been made to ensure alignment between the Schedule of Mitigation [Document 8.13] and the OLEMS.	Issued resolved. Please refer to Point 17 where Natural England wishes to ensure all mitigation is incorporated into the Applicant's RIAA.	
	<b>Dark-bellied Brent Goose</b> The Applicant has provided a range of mitigation measures for dark-bellied brent geese, which have been welcomed by Natural England. It is considered that these are adequate to address the potential impacts, however the Applicant has addressed Natural England's additional points in Appendix I3 at Deadline 5 at Deadline 6.	Issue progressed. To resolve this issue the Applicant should address Natural England's outstanding concerns as detailed in Appendix I3 at Deadline 5.	
	<b>Lapwing, Golden Plover and Curlew</b> Sufficient information has been provided to support the Applicant's conclusions of no AEoI to lapwing, golden plover and curlew from temporary habitat loss and disturbance taking into account the package of mitigation measures provided. The Applicant has engaged directly with Natural England on 24 March 2025 and clarification has been provided as to Natural England's preferred further mitigation measures. The Applicant has considered these and make additions to the OLEMS as appropriate and shared those with Natural England ahead of Deadline 6 to seek resolution of this matter at Deadline 6.  Natural England have welcomed the inclusion of the proposed text and provided further comments which it	Natural England has engaged directly with the Applicant regarding temporary impacts to lapwing, golden plover and curlew and associated mitigation measures on 24 March 2025. Natural England will review any additions to the OLEMS provided by the Applicant.	

	believes should resolve any outstanding issues. Final mitigation measures will be finalised prior to construction.		
	<p>The Applicant does not agree with NE's recommendation for monitoring all ecological noise sensitive receptors and FFL during construction and decommissioning, citing resolved points and the use of absolute noise limits. The Applicant commits to targeted noise monitoring and mitigation measures at specific ecological sites.</p> <p>The Applicant has responded in full to the provision of an excerpt of Natural England's guidance via email, within the Applicant's Responses to NE Appendix H7 Comments on Onshore Ecology.</p>	<p>Natural England advise that monitoring of ecological noise sensitive receptors against the baseline, including designated features of designated sites and any functionally linked land they use, should be outlined in the Noise and Vibration Management Plan (NVMP) and the full NVMP secured as a requirement within the DCO.</p>	
	<p>The Applicant used robust baseline data and protected sites IRZ to establish appropriate mitigation buffers around FLL and ensure seasonal restrictions are fit for purpose. Further to a call with NE on the 24<sup>th</sup> of March 2025, it was agreed that the Applicant would draft an email which further details the Applicant position before Deadline 6.</p>		

### 1.3 Land Use

- The Applicant has considered the potential impacts of the Project from the MLWS along the Onshore Export Cable Corridor (ECC) and the Onshore Substation (OnSS) on land use during the construction, operation and maintenance and decommissioning phases as outlined in Chapter 25 Land Use.

ID	Applicant's Position	Natural England's Position	Status
----	----------------------	----------------------------	--------

	The Applicant has noted Natural England's request for Post 1988 ALC data in the vicinity at Deadline 4	The Applicant has clarified that there are no parcels of land with post 1988 ALC data in the vicinity.	
	The BMV Quantitative Cumulative Assessment demonstrates that the effects on a regional and national scale are not significant. The assessment of economic impacts also demonstrates that the loss of agricultural land will not result in significant economic effects. In respect of EN-3 The Applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.	Natural England requires further justification on this matter in order to resolve this issue. Natural England refer the ExA to NPS EN3 which notes at para 2.10.145 which sets out information that the Secretary of State should take into account.	
<b>Assessment Methodology</b>			
41	The Applicant's cumulative assessment for loss of BMV soils (REP4-117, document 21.12 BMV Quantitative Cumulative Assessment) is appropriate.	Natural England is supportive of the provision of a cumulative assessment for loss of BMV soils [REP4-117 and REP4a-060] as updated and referenced in REP4a-020 and have no further comments.	
43	The Applicant has noted the advice note 17 and considered it alongside IEMA guidelines "A New Perspective on Land and Soils in EIA" (February 2022) methodology for cumulative effects	Natural England have confirmed that this is resolved.	
44	The Applicant has updated the Land Use Chapter (document reference 6.1.25) submitted at Deadline 4A to reflect the additional information available for cumulative effects.	Natural England is supportive of the provision of a cumulative assessment for loss of BMV soils [REP4-117 and REP4a-060] as updated and referenced in REP4a-020 and have no further comments.	
48	The Applicant has adopted effective field methods for assessing dry and friable soil conditions based on the Institute of Quarrying's Good Practice Guide, considering advice to avoid construction work from October to March.	NE acknowledges and welcomes the Applicants reference to the Institute of Quarrying's Good Practice Guide for Handling Soils in Mineral Working within the SMP.	
50	The soil reinstatement methods set out in the Outline SMP are appropriate. The Applicant considers it appropriate for a detailed soil	Natural England requires sight of a Restoration Plan accompanied by a detailed soil balance for review.	



	restoration plan, inclusive of a detailed soil balance to be produced upon completion of soil surveys and following detailed design, and Natural England will receive this.		
52	The Applicant has provided sufficient evidence for decommissioning. Project infrastructure will be decommissioned in accordance with a decommissioning plan secured by the DCO. The decommissioning plan will review regulations and best practices at the time and propose appropriate methodologies to inform the duration of soil aftercare appropriate.	Natural England welcomes the additional information provided in REP3-021, however to resolve the issue Natural England requires clarification from the Applicant on the duration of soil after care that will be conducted during the post-decommissioning phase of the project.	
<b>Assessment Conclusions</b>			
38	The Applicant has provided sufficient information to justify its position for classifying the sensitivity of soils as High.	Natural England agrees that the sensitivity of soils should be classified as High. The Applicant and Natural England do not agree as to the timing of ALC surveys to be carried out	
	The Applicant has provided sufficient justification as to its position in respect of the carrying out of ALC surveys post consent.	Natural England's position remains that ALC surveys should be carried out pre consent.	
40	The applicant agrees that the reuse of topsoil is sustainable but does not mitigate the permanent loss of agricultural land. The impact has been assessed as significant locally but minimal regionally and nationally, and the project supports renewable energy goals.	Natural England notes and agrees with the assertion that where possible reuse is an acceptable and sustainable measure. However, Natural England's position and advice remains that permanent loss cannot be mitigated for.	
<b>Mitigation and Monitoring</b>			
37	The Applicant has provided sufficient evidence for decommissioning in Document 22.3 The Applicant's Comments on Deadline 4 Submissions, within 1.3.8 Table 30, para 1 Appendix H5- Natural England's Comments on Soils.	Natural England's advice remains for the Applicant to provide a firm commitment to decommission the site after 35 years (or sooner if no longer operational), to remove all infrastructure and equipment and to return the land to its original condition and ALC grade.	

45	The Applicant has updated the SMP to stipulate the relevant SNCB will be consulted. On this basis it is considered that the RAG status can be changed to Green at Deadline 6.	To resolve this issue Natural England requires the SMP to also stipulate the relevant SNCB will be consulted.	
46	Within the oCoCP and oSMP the Applicant has committed to pre-commencement soil surveys and nutrient analysis to restore the land to its predevelopment quality and baseline agricultural land classification post-construction.	Natural England's' advice remains for the Applicant to commit to ALC surveys pre consent.	
47	The Applicant has updated the OLEMS and SMP to include a soil specialist, ensuring robust supervision of land soil handling.	Agreed.	
49	The Applicant is committed to the use of machinery in accordance with best practice, as per the Outline SMP (document 8.1.3).	Agreed.	
51	The Applicant has included an appropriate commitment within updates to the oSMP at Deadline 6.	Natural England advises to resolve this issue there should be a commitment to avoid mowing and stripping in wet conditions.	
59	The Applicant's commitments to post-construction aftercare, as per the oSMP are appropriate. The Applicant has provided sufficient evidence for decommissioning in responses at Deadline 4.	The Applicant has not provided information regarding the duration of soil aftercare for post construction and post decommissioning of the project.	
60	The Applicant has committed within the oSMP to undertake ALC surveys post consent and considers there are significant advantages to the Applicant's scheduling of ALC surveys. The Outline Soil Management Plan and commitment to include detailed information on soil horizons, depth and volumes in the final SMP are appropriate.	NE advises that soil stripping depths should be clearly set out, reflecting the soil horizon depths identified from the detailed soil surveys. NE advice remains that ALC surveys should be conducted to inform this.	

## 1.4 Geology and Ground Conditions

ID	Applicant's Position	Natural England's Position	Status
Assessment Methodology			
	The Applicant has undertaken sufficient investigations, including desk based assessments and ground investigations at the landfall to mitigate ground stability risks such as those which resulted in the formation of sinkholes on the Triton Knoll project. Clarifications have been provided at Deadline 4 to resolve the issue.	NE requires ground investigations to be undertaken at landfall to reduce the risk of sink hole formation.	
	The Applicant has updated the Preliminary land Quality Assessment Table 23.3 (6.3.23.1, Chapter 23 Appendix 1) to include a full list of designated statutory and non-statutory sites.	Agreed.	
Assessment Conclusions			
	The Applicant has sufficiently assessed and mitigated impacts on designated sites with geological features during the construction phase. There are no impacts on designated sites with geological features anticipated during operation, maintenance, cable repair, and decommissioning phases.	NE is satisfied that the Applicant has sufficiently assessed and mitigated and potential effects on designated sites with geological features.	
Mitigation and Monitoring			
	The Applicant has set out sufficient mitigation measures within the outline CoCP for areas of high sensitivity near to designated sites. These measures are secured by DCO Requirement 18 and include pollution management controls and site area demarcation.	NE is satisfied that the mitigation measures within the outline CoCP for areas of high sensitivity near to designated sites are sufficient.	

## 1.5 Air Quality

4. The Applicant has considered the potential impacts of the Project from the MLWS along the Onshore Export Cable Corridor (ECC) and the Onshore Substation (OnSS) on onshore air quality during the construction, operation and maintenance and decommissioning phases as outlined in Chapter 19 Onshore Air Quality.

ID	Applicant's Position	Natural England's Position	Status
Assessment Methodology			
	<p>The Applicant has undertaken a risk-based approach to assessing construction dust impacts up to 50m from ecologically sensitive receptors, which aligns with IAQM guidance. The assessment applies the maximum level of dust risk and protection, incorporating IAQM best practice controls where relevant. These are secured through 50 specific mitigation measures outlined in the Outline Air Quality Management Plan (document 8.1.2 version 2). The Applicant does not agree that ongoing monitoring at ecological designated sites &gt;50m from dust generating activity is practical, or required as Natural England has accepted that the proposed mitigation is acceptable to provide sufficient protection.</p> <p>Additional wording has been added to the AQMP to resolve any outstanding queries and clarification provided in respect of how this additional wording would factor into feedback and actions. The Applicant therefore believes this matter is resolved.</p>	<p>The mitigation provided by the Applicant is acceptable to sufficiently protect designated features within ecological designated sites from construction dust.</p> <p>Natural England requires ongoing monitoring at ecological designated sites &gt;50m from dust generating activity should be included and outlined within the Air Quality Management Plan.</p>	
Mitigation and Monitoring			



	<p>The Applicant addressed NE's concerns about construction dust mitigation by referencing the IAQM construction dust assessment and including these controls in the AQMP, which is part of the Outline CoCP. They consider these measures as embedded mitigation and believe the RAG status can be changed to Green at Deadline 4.</p>	<p>The mitigation provided by the Applicant is acceptable to sufficiently protect designated features within ecological designated sites from construction dust.</p>	
--	---	--	--