EAST PARK ENERGY

East Park Energy

EN010141

Environmental Statement
Volume 1 – Main Report

Chapter 7: Ecology and Nature Conservation

Document Reference: EN010141/DR/6.1

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Regulation 5(2)(a)

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EAST PARK ENERGY

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Environmental Statement
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Chapter 7: Ecology and Nature Conservation

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7.0 ECOLOGY AND NATURE CONSERVATION

7.1 Introduction

7.1.1 This chapter of the Environmental Statement (ES) provides an assessment of the likely effects of the Scheme on ecological receptors during the construction, operation and decommissioning phases.

7.1.2 It should be noted that only common species names are referred to throughout this chapter. Where there is potential for confusion, full biological nomenclature is provided within the relevant technical appendices submitted, together with species conservation status and legislative protection where relevant.

7.1.3 This chapter is supported by the following appendices in **ES Volume 2 [EN010141/DR/6.2]**:

- **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-2: Breeding Bird Survey Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-3: Wintering Bird survey Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-4: Confidential Badger Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-5: Great Crested Newt Survey Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-6: Otter and Water Vole Survey Report [EN010141/DR/6.2]**; and
- **ES Vol 2 Appendix 7-7: Bat Survey Report [EN010141/DR/6.2]**.

7.1.4 This chapter is supported by the following figures in **ES Volume 3 [EN010141/DR/6.3]**:

- **ES Vol 3 Figure 7-1a: Statutory Designated Sites – Nationally Designated Sites within 5km [EN010141/DR/6.3]**;
- **ES Vol 3 Figure 7-1b: Statutory Designated Sites – Internationally Designated Sites within 10km [EN010141/DR/6.3]**;
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- **ES Vol 3 Figure 7-8: Badger Survey (confidential) [EN010141/DR/6.3]**; and,
- **ES Vol 3 Figure 7-9: Breeding Bird Survey – Schedule 1 Species (confidential) [EN010141/DR/6.3]**.

7.1.5 A report to inform Habitats Regulations Assessment has been prepared as part of the application for development consent, and is submitted separate to the ES as **Information to Inform a Habitats Regulations Assessment [EN010141/DR/5.7]**.

7.1.6 A **Biodiversity Net Gain Report [EN010141/DR/7.17]** has also been prepared separate to the ES as part of this application for development consent.

Statement of Competence

7.1.7 This assessment has been prepared by Avian Ecology Ltd. Lead author: Mr J. Stevens BSc (Hons) Principal Ecologist supported by Mr J. Whittick MCIEEM Technical Director. Mr Stevens and Mr Whittick have over 9 years and 20 years' experience respectively as ecological consultants. During this

time they have written and contributed to numerous ES report chapters for ecological or ornithological interest, including for large-scale renewable energy developments.

7.2 Legislation, Policy and Guidance

Legislation

7.2.1 Legislation of relevance to this assessment includes:

- The Conservation of Habitats and Species Regulations 2017;
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017;
- The Wildlife and Countryside Act 1981;
- The Environment Act 2021;
- Countryside and Rights of Way Act 2000;
- Protection of Badgers Act 1992;
- Hedgerow Regulations 1997;
- Management of Hedgerow Regulations 2024;
- The Invasive Alien Species (Enforcement and Permitting) Order 2019;
- Natural Environment and Rural Communities (NERC) Act 2006; and,
- Biodiversity Net Gain statutory Instruments, comprising:
    - The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2023;
    - The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2023;
    - The Biodiversity Gain Site Register Regulations 2023;
    - The Biodiversity Gain Requirements (Exemptions) Regulations 2023;
    - The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2023; and
    - The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.

7.2.2 The 'UK Post-2010 Biodiversity Framework'[1] and its successor the UK Biodiversity Framework (2024)[2] supersede the UK Biodiversity Action Plan[3] ('UK BAP') and 'Conserving Biodiversity – the UK Approach'[4]. The lists of priority species and habitats agreed under UK BAP still form the basis of much

biodiversity work and are therefore considered within this report in the context of the objectives of the Biodiversity Framework. BAPs identify 120 habitats and species of nature conservation priority on a UK ('UK BAP') and Local ('LBAP') scale. UK BAPs formed the basis for statutory lists of priority species and habitats in England under Section 41 Biodiversity lists and action (England) of the NERC Act 2006, and so are also relevant in the context of this legislation.

Policy

National Policy

7.2.3 The following National Policy Statements (NPS) set out national planning policies in relation to nationally significant solar photovoltaic generation developments and electricity networks:

- Overarching NPS for Energy (EN-1)[5]; and
- NPS for Renewable Energy Infrastructure (EN-3)[6];
- NPS for Electricity Networks Infrastructure (EN-5)[7].

7.2.4 The National Planning Policy Framework (NPPF)[8], and the accompanying online Planning Practice Guidance (PPG)[9] are also important and relevant but are not the key policy documents against which the application will be determined.

7.2.5 Relevant national policies in relation to ecology and nature conservation are summarised in Table 7.1:

Table 7.1 Summary of National Planning Policy

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
NPS EN-1	5.4.17	Where the development is subject to EIA, the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated	The impacts and effects on ecological receptors including designated sites, species, and habitats are set out in Section 7.8 of this chapter.

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
		sites of ecological or geological conservation importance (including those outside England), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.	
	5.4.25	The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment (AA) is required.	The Applicant has prepared **Information to Inform Habitats Regulations Assessment [EN010141/DR/5.7]** which has been informed by the assessments and conclusions of this ES. The potential for significant effects to occur to qualifying species associated with a European site has been screened out, and as such Appropriate Assessment is not required.
	5.4.32	Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases.	The Applicant has prepared **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]** that confirms there is no ancient woodland or veteran trees within the Site. Further, as set out in **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**, there are no irreplaceable habitats within the Site. Measures are outlined within the **outline Construction Environmental Management Plan (oCEMP)**

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			[EN010141/DR/7.3] for the protection of off-site ancient woodland habitats
	5.4.34	Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance.	Section 7.8 of this chapter provides assessment of the likely impacts and effects on habitats and species.
	5.4.35	Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development.	Section 7.7 of this chapter sets out the embedded mitigation measures incorporated within the design and proposed management of the Scheme
	5.4.36	Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages.	The Applicant has prepared an **outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]** that sets out how the existing and proposed habitats and other biodiversity enhancements within the Site will be managed across all phases of the Scheme. The **oCEMP [EN010141/DR/7.3]** contains further measures that will be adopted across the construction phase, including toolbox talks for site operatives.
	5.4.46	Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design.	The **Design Approach Document [EN010141/DR/5.6]** sets out how the Scheme delivers on good design, and how the design process has been

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
			informed by design principles that seek to deliver multiple environmental benefits. The illustrative layout for the Scheme is presented on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** which is annotated to show the purpose and benefits of individual features.
	5.4.55	The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and the other relevant legal tests are met.	Section 7.10 of this chapter concludes that there would be no likely significant adverse effects to any ecological receptors.
NPS EN-3	2.10.76	The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.	Section 7.8 of this chapter provides an assessment of the likely significant effects on ecological receptors.
	2.10.77	Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers.	The Applicant has undertaken a suite of ecological surveys to inform the assessment of impacts and effects, as set out in the baseline in Section 7.6 of this chapter.
	2.10.78	The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.	The Applicant has followed the mitigation hierarchy in designing and assessing the impacts and effects of the Scheme, as set out in Section 7.7 and 7.8 of this chapter.

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
	2.10.79	The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features, and should specify mitigation to avoid or minimise these impacts, and any further surveys required.	A desk study has been undertaken as part of this assessment, as reported in Section 7.6 of this chapter. This has included obtaining local biodiversity records. Embedded and additional mitigation measures are outlined in Section 7.7 and 7.9 of this chapter, respectively.
	2.10.82	Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.	Security and lighting considerations are considered as part of the assessment of impacts and effects in Section 7.8. Mitigation measures in relation to lighting are set out in the **oCEMP [EN010141/DR/7.3]**.
	2.10.83	Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the construction and design of any fencing should account for enabling mammal, reptile and other fauna access into the site if required to do so in the ecological report.	The design of the Scheme has sought to retain existing boundary features as far as practicable. The **oLEMP [EN010141/DR/7.7]** sets out the buffer strips to existing hedgerows and ditches that have been embedded into the design of the Scheme. The proposed fencing will include mammal gates, as set out in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

Local Policy

7.2.6 The Scheme lies within the administrative boundaries of Bedford Borough Council (BBC) and Huntingdonshire District Council (HDC), with HDC being a two-tier authority with Cambridgeshire County Council. Planning policy of relevance to the assessment that will be considered includes:

- Bedford Borough Local Plan 2030[10];
- Huntingdonshire Local Plan to 2036[11]; and
- Great Staughton Neighbourhood Plan 2021 to 2036[12].

7.2.7 Relevant local planning policies from the above documents are summarised in Table 7.2.

Table 7.2 Summary of Local Planning Policy

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
Bedford Borough Local Plan 2030	Policy 40: Hedgerows	Requires hedgerows to be retained on site unless there are overriding benefits that justify their removal. Requires that replacement hedgerows should be of an equal scale, native and species-rich, and that where there are gaps in existing hedgerows on Site, the development should provide for additional hedgerow planting.	The Applicant has sought to protect hedgerows on Site as far as practicable by providing buffers. Table 2-34 of **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]** sets out the anticipated hedgerow loss during construction, which relates only to short sections of hedgerow for access or cabling works. Substantial additional hedgerow planting is proposed, with over 17km of hedgerow proposed as part of the Scheme. The proposed specification of hedgerows and their future management is set out in the **oLEMP [EN010141/DR/7.7]**.
	Policy 42S: Protecting Biodiversity	Requires the applicant to assess the impact of development on biodiversity and geodiversity. Where	This chapter provides an assessment of the likely impacts and effects of the Scheme on ecological receptors. Section 7.7

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
	and Geodiversity	protected species or priority habitats of principal importance are adversely affected, the application will need to demonstrate how the proposed mitigation will reduce the adverse effects. A proposal which is likely to have an adverse effect on a Site of Special Scientific Interest (SSSI) or Natura 2000 site will not be permitted unless there are exceptional reasons that outweigh the harm to the site. Developments with potential to have an adverse impact, either alone or in-combination, on the integrity of a European Designated Site will be assessed in accordance with the requirements of the Habitats Regulations.	sets out the mitigation measures that are embedded into the Scheme to avoid or reduce the adverse effects. The assessment in this chapter includes an assessment of SSSIs, which concludes there would be no adverse effects on SSSIs. The Applicant has prepared **Information to Inform Habitats Regulations Assessment [EN010141/DR/5.7]** which has been informed by the assessments and conclusions of this ES.
	Policy 43: Enhancing Biodiversity	Requires development to provide a net increase in biodiversity through the enhancement of existing features on site and creation of additional habitats, whilst opportunities to link existing habitats should be taken.	**ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** provides the layout of the Scheme that has been assessed for the purpose of biodiversity net gain. A **Biodiversity Net Gain Report [EN010141/DR/7.17]** has been prepared as part of the application, which concludes the Scheme will result in substantial biodiversity net gain.
Bedford Interim Guidance on Achieving Biodiversity Net Gain	Bedford Interim Guidance on Achieving	Supports Bedford Borough Local Plan Policy 43 and provides required use of a	A **Biodiversity Net Gain Report [EN010141/DR/7.17]** has been prepared as part of the application, which concludes the Scheme

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
	Biodiversity Net Gain	biodiversity metric calculator. Provides guidance as to design specification of bird, bat and invertebrate boxes in development.	will result in substantial biodiversity net gain. The **oLEMP [EN010141/DR/7.7]** sets out how ecological enhancements will be incorporated within the design of the Scheme.
Huntingdonshire Local Plan to 2036	Policy LP 30: Biodiversity and Geodiversity	Requires development proposals to assess adverse effects on biodiversity and geodiversity and, where internationally designated sites could be affected, provide an Appropriate Assessment under the Habitats Regulations. Requires the mitigation hierarchy to have been followed to minimise adverse effects as far as practicable. States that development which result lead to the deterioration of water body ecological status will be not be supported. Requires development to achieve no not loss in biodiversity, and provide a net gain where possible.	This chapter provides an assessment of the likely impacts and effects of the Scheme on ecological receptors. Section 7.7 sets out the mitigation measures that are embedded into the Scheme to avoid or reduce the adverse effects. The Applicant has prepared **Information to Inform Habitats Regulations Assessment [EN010141/DR/5.7]** which has been informed by the assessments and conclusions of this ES. **ES Vol 2 Appendix 8-2: Water Framework Directive Assessment [EN010141/DR/6.2]** provides an assessment of the Scheme against the water bodies within the Order Limits. A **Biodiversity Net Gain Report [EN010141/DR/7.17]** has been prepared as part of the application, which concludes the Scheme will result in substantial biodiversity net gain.
	LP 31: Trees, Woodland, Hedges and Hedgerows	Requires an assessment of a development on trees and hedgerows. Sets out that where loss, threat or damage cannot be fully addressed	**ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]** includes the results of a tree and hedgerow survey

Document	Policy / Paragraph Reference	Summary of Policy / Paragraph	Where addressed in the ES?
		through minimisation and/ or mitigation measures the proposal may be supported if alternative measures such as reinstatement of features, additional landscaping, habitat creation or tree planting will compensate for the harm and can be implemented and established before development starts.	across the Site, as well as an assessment of impacts. The proposed landscape and habitat creation is set out in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]** and in the **oLEMP [EN010141/DR/7.7]**.
Great Staughton Neighbourhood Plan 2021 to 2036	GSNP 11	Requires development proposals to assess adverse effects on biodiversity and wildlife habitats, and follow a mitigation hierarchy.	This chapter provides an assessment of the likely impacts and effects of the Scheme on ecological receptors. Section 7.7 sets out the mitigation measures that are embedded into the Scheme to avoid or reduce the adverse effects.

Guidance

7.2.8 Consideration has been given to the following best practice guidelines/guidance:

- Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine (Chartered Institute of Ecology and Environmental Management (CIEEM), 2018)[13];
- The 25-year Environment Plan[14];
- Natural England and Department for Environment, Food and Rural Affairs (DEFRA) Protected Species and Development: advice for local planning authorities)[15];
- Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition) (Collins, 2023)[16].

- Biodiversity Net Gain. Good practice principles for development (CIEEM, CIRIA, IEMA, 2016)[17];
- The Statutory Biodiversity Metric User Guide (DEFRA, 2024[18]);
- Planning Practice Guidance (Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, 2024)[19];
- BS 42020:2013 'Biodiversity – Code of Practice for Planning and Development (British Standard)'; and,
- BS 8683:2021 'Process for designing and implementing Biodiversity Net Gain. Specification (British Standard)';

7.2.9 Specific guidance documents and survey methodologies are referenced in the relevant technical appendices **ES Vol 2: Technical Appendix 7-1 to 7-7 [EN010141/DR/6.2]** accompanying this chapter.

7.3 Consultation and Engagement

Scoping

7.3.1 Scoping of this assessment was undertaken as part of a wider EIA scoping exercise, the findings of which were recorded in **ES Vol 2 Appendix 4-1: EIA Scoping Report [EN010141/DR/6.2]** that was submitted in October 2023.

7.3.2 A Scoping Opinion was received in December 2023 as presented in **ES Vol 2 Appendix 4-2: EIA Scoping Opinion [EN010141/DR/6.2]**. The feedback received from PINS and stakeholders within the Scoping Opinion has been reviewed and the points relating to this chapter are summarised in Table 7.3 below.

7.3.3 Table 7.3 sets out a record of relevant scoping responses:

Table 7.3: Scoping responses with respect to ecology and nature conservation

Consultee	Summary of Comments	Response to Consultee
PINS	The Scoping Report explains that an Ecological Impact Assessment (EcIA) and a Biodiversity Net Gain (BNG) assessment will be submitted with the DCO application. These documents should clearly differentiate between measures proposed to mitigate significant effects of the Proposed Development and measures proposed to support BNG.	Mitigation measures have been outlined within Section 7.7 and 7.9 of this ES chapter. A **Biodiversity Net Gain Report [EN010141/DR/7.17]** has been prepared as part of the application, which concludes the Scheme will result in substantial biodiversity net gain.
PINS	The ES should provide an assessment of likely significant effects on international statutory designated sites, including the potential for the Proposed Development site to provide functionally linked land for species which are qualifying features of European sites or provide the evidence referred to above,	Statutory designated sites (Eversden and Wimpole Woods Special Areas of Conservation (SAC)) scoped into assessment. Assessment provided in Section 7.8.

Consultee	Summary of Comments	Response to Consultee
	demonstrating an absence of Likely Significant Effects (LSE[1]).	
PINS	In the absence of information detailing the avoidance and mitigation measures proposed, the Inspectorate considers that the ES should provide an assessment of the potential effects of the Proposed Development on all national designated sites located within 5km of the DCO boundary or provide a justification as to the absence of LSE including evidence of agreement with relevant consultation bodies.	Zone of Influence (ZoI) includes all nationally designated sites within 5km of the Scheme. Embedded mitigation measures outlined in Section 7.7 and an assessment of impacts and effects is provided in Section 7.8. Consultation has been undertaken with Natural England agreeing the application presents a low risk to designated sites.
PINS	In the absence of information detailing the avoidance and mitigation measures proposed, the ES should provide an assessment of the potential effects of the Proposed Development on all non-statutory designated sites located within 2km of the site or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.	ZoI includes all non-statutory designated sites within 2km of the Scheme. Embedded mitigation measures outlined in Section 7.7 and an assessment of impacts and effects is provided in Section 7.8.
PINS	The ES should provide an assessment of the potential effects of the Proposed Development on ancient woodland, veteran trees and other irreplaceable habitats located within 2km of the entire site boundary, including the PV area and grid connection route, or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.	ZoI includes all ancient and irreplaceable habitats within 2km of the Scheme. Assessment of impacts and effects is undertaken in Section 7.8 of this chapter.
PINS	The Inspectorate is content to scope priority habitats out as an assessment of construction impacts is proposed and will assess the	The Applicant notes this comment.

[1] The term likely significant effects is used here in the context of both the EIA Regulations and also the Habitat Regulations

Consultee	Summary of Comments	Response to Consultee
	potential long term or permanent effects of habitat loss, severance and disturbance of priority and other on-site habitats through the operation and decommissioning phases of the Proposed Development.	
PINS	In the absence of a comprehensive set of non-breeding bird survey results covering the entirety of the site, the Inspectorate considers that the ES should include an assessment of non-breeding birds or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.	Further survey for non-breeding birds has been undertaken and is presented in **ES Vol 2 Appendix 7-3: Wintering Bird Survey Report [EN010141/DR/6.2]**. An assessment of likely impacts and effects is provided in Section 7.8.
PINS	Provided relevant mitigation measures are secured through the DCO, the Inspectorate agrees to scope this matter (roosting bats) out of further assessment.	Embedded mitigation measures include avoidance of tree works. Further details provided in Section 7.7 of this chapter.
PINS	The Inspectorate considers that decommissioning effects [on foraging and commuting bats] are unlikely to give rise to materially greater effects than construction and is content to scope this matter out of further assessment.	The Applicant notes this comment.
PINS	The ES should include an assessment of amphibians during operation and decommissioning or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.	Assessment of impacts and effects is undertaken in Section 7.8 of this chapter.
PINS	ES should include an assessment of effects on reptiles, badgers, water vole, otter and invertebrates or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.	Badger scoped out of assessment as of Site value only and any effects would not be significant, as agreed with Cambridgeshire County Council (set out in Table 7.4). Measures to ensure legislative compliance are included within the **oCEMP [EN010141/DR/7.3]**. Reptile, water vole, otter and

Consultee	Summary of Comments	Response to Consultee
		invertebrates have been scoped in to the assessment,
PINS	In relation to internationally designated sites, the ES should consider the potential for effects to occur beyond 10km.	ZoI increased to 30km for internationally designated sites with bats as a qualifying feature. Eversden and Wimpole Woods SAC scoped in to assessment.
PINS	The ES must report the full survey findings and list all receptors identified as potentially present on site and assess significant effects where they are likely to occur.	Surveys and desk study to inform the assessment of impacts and effects are set out in Section 7.6 of this chapter.
PINS	The Scoping Report cites two varying sources of data regarding the number of County Wildlife Sites (CWS) within the study area	CWS data provided in **ES Volume 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**.
PINS	Appropriate buffer zone distances between elements of the Proposed Development and sensitive habitat types, including watercourses, hedgerows, ancient woodland and veteran trees, should be defined in the ES, with reference to how this is secured through the DCO	The Scheme parameters are set out in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**, with buffers also set out in the **oLEMP [EN010141/DR/7.7]**. A summary of embedded mitigation measures is provided in Section 7.7.
PINS	No fish or aquatic invertebrate surveys have been or are noted as being undertaken on the Pertenhall Brook or River Kym. Details of the surveys should be provided within the ES, or it should be demonstrated why LSE on fish and aquatic invertebrates are not expected to arise.	Watercourse impacts, including to fish and aquatic invertebrates, have been scoped out with reference to embedded mitigation in Section 7.7. All watercourses include 10m buffers, with the exception of localised crossing points which have been designed to be low impact. Measures to protect fish and aquatic invertebrates are included within the embedded **oCEMP [EN010141/DR/7.3]**.
PINS	The ES should assess potential impacts from Invasive non-native species (INNS) where significant effects are likely to occur	Measures to address invasive species are included in the **oLEMP [EN010141/DR/7.7]** and outlined in Section 7.7.

Consultee	Summary of Comments	Response to Consultee
PINS	Detailed breeding bird, wintering bird and bat activity surveys should be conducted for the Proposed Development site, including the access and cable routes, or the ES should provide evidence of agreement from relevant consultation bodies that such surveys are not required.	Surveys have been undertaken as described in Section 7.6 of this chapter. Survey effort within cable routes has been discussed with relevant consultees (Cambridgeshire County Council and Natural England).
PINS	Information relating to sensitive/ vulnerable ecological features should be provided in a confidential annex/ appendix.	The Applicant notes this comment. **ES Vol 2 Appendix 7-4: Badger Survey Report [EN010141/DR/6.2]** is marked as confidential and will be provided to the inspectorate and to relevant consultees separately.
Bedford Borough Council	While BBC's Local Plan 2030 does not set the % of BNG to be attained, Policy 43 does require a 'net increase in biodiversity'. This matter is addressed by the Applicant. However, we refer the Applicant to the DRAFT BBC Local Plan 2040, Policy DM7 which requires 'securing a minimum of 10% BNG'; and further §6.62 'the environmental agenda has moved on and it is now suggested we should go further than biodiversity net gain and adopt an environmental net gain approach in planning and development	A **Biodiversity Net Gain Report [EN010141/DR/7.17]** has been prepared as part of the application, which concludes the Scheme will result in substantial biodiversity net gain.
Bedford Borough Council	Note CIEEM guidance in relation to lifespan of ecological surveys and reporting	The Applicant notes this comment.
Bedford Borough Council	1. Priority Habitats - operation and decommissioning scoped out: the Applicant will need to assess and evidence how during these two stage the scheme will manage, maintain, and restore these habitats as required by the Act; suggest stages to be scoped in. 2. Other on-site habitats - operation scoped out: suggest stages to be scoped in.	Priority habitats have been scoped into assessment at construction and operation. Decommissioning impacts are considered comparable with those experienced during construction. On site habitats and amphibians have been scoped in to the operational phase assessment. Roosting bats have been scoped out of the assessment as agreed

Consultee	Summary of Comments	Response to Consultee
	3. Amphibians - operation scoped out: suggest stages to be scoped in. Further, see attached submission by NatureSpace which concludes 'We are in agreement that great crested newt should be scoped into the Environmental Statement. In line with guidance from Natural England (Great crested newts: District Level Licensing for development projects, Natural England, March 2021), there is a reasonable likelihood that great crested newts would be impacted by the development proposals. It is therefore considered likely that a licence would be required to implement the proposal' (NatureSpace comment sheet; 24/11/2023). 4. Bats (roosting) - all stages scoped out. In light of the fact that 'Bats (Foraging and commuting)' for construction and operation are scoped in, to allow for a consistent assessment, Bats (roosting) should be scoped in. 5. Badgers - all stages scoped out. In light of the fact that badgers are territorial and maintain main, annex and outlying setts, collectively this will need to be surveyed, assessed, and possible mitigation proposed. Construction and operation should be scoped in	with PINS through scoping, with reference to embedded avoidance of suitable roost features. Badgers are scoped out of assessment as any effects would not be significant. The species is considered with regards to legal compliance and best practice. Scoping of ecological features detailed in Table 7.13 with justification where appropriate.
Cambridge shire County Council	Insufficient detail has been provided for the decommissioning phase for the Council to agree scoping out of any ecological features. The Council would expect priority habitats, habitats of local-county importance or those supporting notable species created / managed during the operational phase to be retained during decommissioning and long-term management secured. We recommend the Application include an Outline	Decommissioning has been scoped out of the assessment with ecological effects considered to be comparable to those experienced during construction. Further information on decommissioning phase provided within **ES Volume 1 Chapter 2: The Scheme [EN010141/DR/6.1]**. An **outline Decommissioning Environmental Management Plan [EN010141/DR/7.6]** has been provided with the application.

Consultee	Summary of Comments	Response to Consultee
	Decommissioning Environment Management Plan	
Cambridgeshire County Council	The Council does not agree with the proposed Zone of Influence (ZoI) for ecological features - ZoI for European Sites designated for bats should be expanded to 30km (including Eversden and Wimpole Woods Special Area of Conservation). - ZoI for Water Vole / Otter should be expanded to land within the Site and immediately surround habitat (including 500m section of watercourses downstream of the site, watercourses within 10m of development, and other suitable aquatic and terrestrial habitats). - ZoI for arable field margins / arable flora should be included for land within the Site and immediately surrounding habitat (impacted by shading / hydrological links).	ZoI expanded to 30km for European sites with bat qualifying features and now includes Eversden and Wimpole Woods SAC. ZoI for otter and water vole expanded to watercourses within and adjacent the Site, and suitable habitat up to 200m up/ downstream for otter. The Scheme includes a 10m buffer from all watercourses, with the exception of crossing points. Surveys of suitable habitat have been undertaken up to 100m from crossing points based on the scale and nature of works and likelihood of impacts to otter including fragmentation and disturbance to breeding and non-breeding holts/ resting places. ZoI for habitats includes land immediately adjacent to the Site. Study areas for each receptor area are outlined in Section 7.3, and have been selected with consideration of this response.
Cambridgeshire County Council	The additional targeted / update ecological surveys of the Site should be expanded to address the above concerns regarding ZoI, including detailed botanical surveys for arable flora and priority habitats, barbastelle bats and water vole / otter. Surveys /assessment should be based on the latest guidelines (e.g. bats, badgers, breeding birds and Biodiversity Net Gain)	See above in relation to ZoI. Study areas for each receptor area are outlined in Section 7.3, and have been selected with consideration of this response. Best practice guidance for surveys and assessment has been followed as referenced in **ES Vol 2 Appendices 7-1 to 7-7 [EN010141/DR/6.2]**. Survey data collected to date is presented in **ES Vol 2 Appendices 7-1 to 7-7 [EN010141/DR/6.2]**.

Consultee	Summary of Comments	Response to Consultee
Cambridgeshire County Council	A Habitats Regulations Assessment screening with Natural England would be beneficial given the site is located within 30km of Eversden and Wimpole Woods Special Area of Conservation.	The Applicant has prepared **Information to Inform Habitats Regulations Assessment [EN010141/DR/5.7]** which has been informed by the assessments and conclusions of this ES.
Environment Agency	Clarification of extent of water vole and otter surveys (general or targeted).	Survey and mitigation in relation to otter and water vole are outlined in Sections 7.6 and 7.7 including details of further and pre-commencement surveys.
Hail Weston Parish Council	Invertebrates should be scoped in. Rare moths (e.g., small eggar moth) could be affected during construction.	Invertebrates have been considered within the baseline (Section 7.6) and impact assessment (Section 7.8).

7.3.4 Following receipt of the scoping opinion, the Applicant engaged with Natural England and the host authorities to agree matters relevant to the assessment, as set out in Table 7.4 below.

Table 7.4: Summary of consultation following receipt of the scoping opinion

Consultee	Type and Date	Summary of Comments	Response to Consultee
Natural England	Discretionary Advice Service 8th February 2024	It is considered likely that you will be able to screen out adverse impacts on the following Sites of Scientific Interest ('SSSI's) identified in the submitted Environmental Impact Assessment due to immobile notified features, distances involved and lack of emission pathways both during the operational and construction phases with regard to standard construction practices: • Little Paxton Wood SSSI; • Swineshead wood SSSI; • Perry Wood SSSI;	The SSSIs listed have been scoped out of assessment.

Consultee	Type and Date	Summary of Comments	Response to Consultee
		• St Neots Common SSSI;	
Natural England	Discretionary Advice Service 8th February 2024	The following sites are designated for mobile species which therefore increases the potential for an impact pathway: • Grafham Water SSSI; • Little Paxton Pits SSSI The development does not appear to trigger any of Natural England's Impact Risk Zones ('IRZ's) for any of the sites listed above. Our IRZs give a strong indication of where we anticipate impacts from various different types of development, and we therefore consider the application to be of relatively low risk to designated sites. Note, however, that our IRZs are indicative only and should not be considered proof of the absence of an effect where evidence indicates to the contrary, particular given the scale of development proposed.	Wintering bird surveys have been undertaken to assess impact pathways on mobile wintering bird features associated with Grafham Water SSSI and Little Paxton Pits SSSI. Surveys identified an assemblage typical of lowland agricultural habitats in the region and with only low and irregular use by common waterbirds. Both sites have been scoped out of assessment.
Natural England	Discretionary Advice Service 8th February 2024	It is welcomed that [the applicant] are proposing a 10% Biodiversity Net Gain target ahead of the mandatory November 2025 start date for NSIPs (paragraph 8.4.58). Due to the size and nature of the development we encourage a more ambitious goal and recommend discussions take place with other environmental bodies to achieve local and national habitat creation/management objectives. Natural England will comment on the outcomes of the BNG metric but will not comment on the BNG calculations themselves.	A **Biodiversity Net Gain Report [EN010141/DR/7.17]** has been prepared as part of the application, which concludes the Scheme will result in substantial biodiversity net gain.
Cambridge shire	Virtual meeting	Biodiversity net gain should consider relevant nature	A **Biodiversity Net Gain Report**

Consultee	Type and Date	Summary of Comments	Response to Consultee
County Council	15th March 2024	recovery strategies and local strategies in determining strategic significance	**[EN010141/DR/7.17]** has been prepared as part of the application, which concludes the Scheme will result in substantial biodiversity net gain.
Cambridge shire County Council	Virtual meeting 15th March 2024	If protected species licencing is required, then would want to see any required mitigation/ compensation requirements referenced in the application documents	Measures to address legislative compliance are outlined in Section 7.7.
Cambridge shire County Council	Virtual meeting 15th March 2024	Survey work should be undertaken to determine impacts upon Grafham Water. Impacts on woodland not anticipated, however the application needs to show air quality impacts are considered. Impact of lighting on adjacent designated sites (e.g., Huntingdon woods) needs to be considered)	Grafham Water is designated for wintering bird populations. Results of wintering bird surveys have been presented in **ES Vol 2 Appendix 7-3: Wintering Bird Survey Report [EN010141/DR/6.2]** and impacts discussed in Section 7.8.
Cambridge shire County Council	Virtual meeting 15th March 2024	Construction methods should be included to allow for assessment of construction impacts (e.g., dust and vibration)	Mitigation measures for the construction phase are provided in the **oCEMP [EN010141/DR/7.3]**.
Cambridge shire County Council	Virtual meeting 15th March 2024	Notable arable flora may be present in field margins and should be assessed. This could be undertaken pre-construction	The baseline habitat assessment includes notable arable flora. The **oCEMP [EN010141/DR/7.3]** provides for pre-construction surveys.
Cambridge shire County Council	Virtual meeting 15th March 2024	Consider otter and water vole zone of influence of 500m, depending on level of impacts	Otter zone of influence expanded to 200m which is considered the maximum distance at which disturbance to

Consultee	Type and Date	Summary of Comments	Response to Consultee
			resting or breeding sites would typically occur. Surveys of suitable habitat have been undertaken up to 100m from crossing points based on the scale and nature of works and likelihood of impacts to otter including fragmentation and disturbance to breeding and non-breeding holts/ resting places.
Cambridge shire County Council	Virtual meeting 15th March 2024	Further consultation may be necessary following completion of breeding bird surveys, with compensation preferred to be in larger areas. Compensation should consider farmland birds as an assemblage.	Assessment of breeding birds provided in Section 7.8.
Cambridge shire County Council	Virtual meeting 15th March 2024	Breeding bird survey should justify any deviation from guidance.	**ES Vol 2 Appendix 7-2: Breeding Bird Survey Report [EN010141/DR/6.2]** sets out the survey methodology for breeding birds.
Cambridge shire County Council	Virtual meeting 15th March 2024	Impacts associated with cable routes (e.g., tree removal) should be considered. If surveys left to pre-commencement need to be included within a Construction Ecological Management Plan	Cable route impacts are discussed in Section 7.8. An **oCEMP [EN010141/DR/7.3]** has been provided with the application.
Cambridge shire County Council	Virtual meeting 15th March 2024	Localised mitigation measures to be provided for works within suitable reptile habitats	An **oCEMP [EN010141/DR/7.3]** has been provided including reasonable avoidance measures.

Consultee	Type and Date	Summary of Comments	Response to Consultee
Cambridge shire County Council	Virtual meeting 15th March 2024	Content to scope out roosting bats and badger, provided adequate survey effort can be demonstrated and measures to ensure legislative compliance are included	Scoping of receptors provided as Table 7.13 and best practice mitigation measures included as Section 7.7.

Statutory Consultation

7.3.5 Statutory consultation on the project took place between September 2024 and October 2024. This included consultation on the Preliminary Environmental Information Report (PEIR) which contained a preliminary assessment of ecological effects. The feedback received from statutory consultees is summarised within Table 7.5.

Table 7.5 – PEIR consultation responses with respect to ecology and nature conservation

Consultee	Summary of Comments	Response to Consultee
Bedford Borough Council	The vast majority of solar panels and underground cabling appear to have been positioned a suitable distance from nearby established trees and hedgerows so not to cause damage during their installation. Additionally, there appears to be a suitable distance between areas of existing trees and solar panels to not result in future pressure to prune or remove trees for reasons such as shading or leaf litter.	The Applicant notes this comment.
Bedford Borough Council	Regarding the Construction Phase, Section 5 of the PEIR Volume 2 Technical Appendices, Appendix 2-3: Outline Construction Environmental Management Plan states that existing trees and vegetation will be protected in accordance with British Standard (BS) 5837:2012. However, details such as Tree Protection Plans specifying where protective	Tree protection plans are provided as part of **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]**.

Consultee	Summary of Comments	Response to Consultee
	measures in accordance with BS 5837:2012 will be implemented have not been provided.	
Bedford Borough Council	Without Tree Protection Plans (TPPs), the PEIR cannot clearly demonstrate exactly how nearby trees and hedgerows will be protected during construction. TPPs for areas such as new site accesses are likely to be required as trees in these areas have higher public visibility and construction traffic and movement of materials will be most prevalent.	Tree protection plans are provided as part of **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]**.
Bedford Borough Council	Areas of hedgerow to be removed for temporary access within the Site will mostly have minimal impact upon local amenity due to their secluded locations. In areas along the Public Highway these will be highly visible. Appropriate mitigation planting has been proposed to reinstate hedgerow lost for access purposes (although concerns is raised elsewhere regarding the fully length of visibility splays to be used at access points).	The Applicant notes this comment. Detail of visibility splays is provided with **ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2]**.
Bedford Borough Council	Proposed species for Woodland and Woodland Belts could benefit from incorporating additional large native tree species. Including species such as Common Beech, Dutch Elm Disease resistant Elm species, Hornbeam and Lime will provide long term improvements to woodland biodiversity and ecological habitats	Species proposed for woodland planting are provided within the **oLEMP [EN010141/DR/7.7]**. The species listed have been considered for inclusion, alongside other species in-keeping with the local landscape and of benefit to local biodiversity.
Bedford Borough Council	Additionally, incorporating fruit trees such as Cherry and Plum species could improve habitat for pollinating insects. Given the significant size of the Development, incorporating UK native non-deciduous species such as Yew, Pine and Holly where site conditions allow would further improve biodiversity. This would aid in diversifying the character and appearance of different sections of	Species proposed for woodland planting are provided within the **oLEMP [EN010141/DR/7.7]**. The species listed have been considered for inclusion, alongside other species in-keeping with the local landscape and of benefit to local biodiversity.

Consultee	Summary of Comments	Response to Consultee
	woodland throughout the Development.	
Bedford Borough Council	Vast areas of land are designated as proposed species diverse open grassland. To improve local tree cover it is recommended more areas of woodland or woodland belts are incorporated into the Development	Areas of open grassland are beneficial to local biodiversity including ground nesting birds of open ground. Any conversion of grassland to woody vegetation would be to the detriment of such species.
Bedford Borough Council	To ensure nearby trees and hedgerows are protected during construction, there should be conditions imposed requiring the installation of protective measures and that working methods are undertaken in accordance with British Standard 5837:2012 Trees in relation to design, demolition and construction – Recommendations.	Tree protection plans are provided as part of **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]**.
Bedford Borough Council	It is recommended the discussed amendments are made to the environmental masterplan and included in the related management plans.	As discussed above amendments taken forward are reflected on the **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** and associated documents including the **oLEMP [EN010141/DR/7.7]**.
Bedford Borough Council	It is suggested that the comments made if incorporated will aid in improving woodland and woodland belt biodiversity and ecological habitat.	Areas of open grassland are beneficial to local biodiversity including ground nesting birds of open ground. Any conversion of grassland to woody vegetation would be to the detriment of such species.
Huntingdonshire District Council	Support is given to the response of Cambridgeshire County Council (CCC) in association with these matters.	Comments provided by CCC have been addressed below.
Huntingdonshire District Council	Regard should be had to this document (Priority Landscapes of	Priority Landscapes of Huntingdonshire and the Hail

Consultee	Summary of Comments	Response to Consultee
	Huntingdonshire) and reference to the Hail Weston-Bushmead Habitat Network. In addition to the objectives for this area, it should be noted that paragraph 4.7.4 for the Priority Area Vision states: “The solar parks within the area will contribute new hedgerows and areas of flower-rich grassland, with any new solar parks also contributing new woodland and other habitats to connect Huntingdon Wood, High Wood and Moor Road Marshy Fields.	Weston-Bushmead Habitat Network documents have been reviewed. The Scheme incorporates extensive hedgerow planting and flower rich grassland amongst other habitats that would support the objectives of these areas.
Huntingdonshire District Council	It is advised that solar panels should be adequately set back from South Brook which is located along the southern boundary of Site D. The current masterplan shows a buffer of 25m although it is acknowledged within the submission that this may change; HDC considers that this should be a minimum distance and should include wildflower, native hedgerow and trees within the buffer so as to promote wildlife connectivity between the nearby County Wildlife Sites	This buffer has been maintained as it is considered a sufficient offset to mitigate for ecological impacts, whilst not compromising the efficiency of land use for the Scheme. No solar panels are proposed within 25m of the South Brook.
Huntingdonshire District Council	The proposals will impact upon skylarks, in relation to mitigation it is advised that: • It is recommended that two skylark plots are created for every one territory lost, with two plots created per hectare. • A 2:1 ratio has been typical for development to account for natural variability in mitigation success and ensuring a gain in skylark habitat. • Typical skylark foraging distances do not exceed 120m in normal circumstances. Longer distance also reduce time spent nest guarding, thus increasing predation risks to young. If skylark plots are to be located further than 120m from the solar farm, the proposed grassland under the solar panels will not provide foraging enhancement for the displaced skylark and additional mitigation will be required to provide foraging opportunities closer to the	Mitigation for ground nesting birds has taken an alternative approach to skylark plots. Instead, the provision of high-quality species diverse grassland will increase foraging suitability as well as offering nesting habitat. It should be noted that skylark plots are intended to provide 'landing pads' to access foraging land amongst crops and not to provide nesting locations. As such, provision of managed species diverse grassland offers both foraging and nesting habitat. This is further discussed in relation to ground nesting birds at Section 7.8. Management of grassland for the benefit of ground nesting birds (and other ecological

Consultee	Summary of Comments	Response to Consultee
	created plots e.g. beetle banks. • It is likely that management of any offsite mitigation (should it be required) will need to be secured by a Section 106 Agreement to last the lifespan of the solar park. • Regard should be given to adjacent sites and mitigation which is to be secured to ensure that the proposals form a cohesive mitigation strategy. The Skylark mitigation strategy should follow, but is not limited to, the recommendations provided in the links below: • Stewardship management practices as set out in AB4: Skylark Plots (https://www.gov.uk/countryside-stewardship-grants/skylark-plotsab4). • RSPB advice: https://www.rspb.org.uk/helping-nature/what-wedo/influence-government-and-business/farming/advice-for-farmershelping-bird-species/skylark-advice-for-farmers (including Land Management for Wildlife – Skylark, downloadable from the banner at top of the page). • Farm Wildlife advice: https://farmwildlife.info/how-to-do-it/farmed-area/skylark-plots/	receptors) is provided in the **oLEMP [EN010141/DR/7.7]**.
Cambridgeshire County Council	The Council is concerned that ecological features have been prematurely scoped-out prior to the completion of adequate baseline survey work, including habitat and botanical surveys and protected species surveys (bat roosts, Great Crested Newt, water vole, otter, reptiles and wintering birds), as well as Arboricultural impact assessment. Furthermore, it is not possible to determine the level of impact of the scheme on these habitats / species.	Additional baseline survey work has been undertaken since publication of the PEIR, including of habitats, otter and water vole, great crested newt and breeding birds. Measures are provided in the embedded **oCEMP [EN010141/DR/7.3]** to ensure legislative compliance, including pre-construction survey, and where required licencing.
Cambridgeshire County Council	The Council is concerned that the assessment doesn't adequately consider the potential impact on wildlife sites, protected / priority species or habitats. Or particular concern is the impact of solar panels and the BESS (noise pollution) on	Natural England have agreed through Discretionary Advice Service that the risk to Grafham Water is low (See Table 7.4).

Consultee	Summary of Comments	Response to Consultee
	bird and invertebrates, including invertebrates found in Moor Road Marshy Fields CWS and designatory species of Grafham Water SSSI. As well as Impact of cabling route, including hydrological impacts, on Huntingdon Wood County Wildlife Site / ancient woodland and pond and ancient woodland County Wildlife	Wintering bird surveys have been undertaken to assess impact pathways on mobile wintering bird features associated with Grafham Water SSSI Surveys identified an assemblage typical of lowland agricultural habitats in the region and with only low and irregular use by common waterbirds and as such Grafham Water SSSI has been scoped out of assessment. The assessment (Section 7.8) considers the impact of the Scheme on ecological receptors including statutory designated sites, non-statutory designated sites, priority and irreplaceable habitats and birds.
Cambridgeshire County Council	The site has the potential to support breeding bird assemblage of county importance. We are concerned there will be an adverse impact on nesting habitat for ground nesting birds (supports 104 breeding pairs of skylark), as a result of displacement from fields with solar arrays, and consider this to be a significant impact. The scheme must be redesigned to fully compensate for this impact, through removal of solar panels, better proposed management of land for these birds, or expansion of red-line boundary to include habitat to accommodate these birds. If this is not possible, then any residual effect should be resolved through the development of a comprehensive off-site compensatory farmland bird scheme, secured through Section 106.	Mitigation for ground nesting birds has taken an alternative approach to skylark plots. Instead, the provision of high quality species diverse grassland will increase foraging suitability as well as offering nesting habitat.

Consultee	Summary of Comments	Response to Consultee
Cambridgeshire County Council	The Huntingdonshire Priority Natural Landscapes document is currently going through approval stages at Huntingdonshire District Council (see https://democracy.huntingdonshire.gov.uk/moderngov/ieDecisionDetails.aspx?AIId=59563). If approved, it will set out nature conservation prioritised within Huntingdonshire and should be considered as part of any planning application. Please consult Huntingdonshire District Council for further information.	Priority Landscapes of Huntingdonshire and the Hail Weston-Bushmead Habitat Network documents have been reviewed. The Scheme incorporates extensive hedgerow planting and flower rich grassland amongst other habitats that would support the objectives of these areas.
Cambridgeshire County Council	The council does not agree that the following ecological features should be scoped out at this stage: - Grafham Water SSSI, given the potential for designatory species (wetland birds) to be affected by solar panels - irreplaceable habitats - roosting bats, given that an arboricultural impact assessment has not been completed - notable flora at this stage, given that no detailed botanical surveys have been completed, particularly for arable margins, other neutral grassland and woodland (PEIR Figure 7-3 Habitat Survey). It is considered that an initial habitat survey does not provide an accurate assessment of the importance of a site for arable flora, particularly given their abundance can vary between season / years.	Natural England have agreed through Discretionary Advice Service that the risk to Grafham Water is low, stating that "The development does not appear to trigger any of Natural England's Impact Risk Zones ('IRZ's) for any of the sites listed above [including Graham Water]. Our IRZs give a strong indication of where we anticipate impacts from various different types of development, and we therefore consider the application to be of relatively low risk to designated sites." **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]** sets out ancient or irreplaceable trees habitat (i.e., ancient woodland, ancient or veteran trees) will not be affected. No irreplaceable habitats are present within the Site. Further **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]** confirms that no trees are required to be removed to facilitate the Scheme. Measures are also proposed within the embedded **oCEMP [EN010141/DR/7.3]** to

Consultee	Summary of Comments	Response to Consultee
		ensure no harm to roosting bats. The baseline habitat assessment (Section 7.6) includes notable flora. The **oCEMP [EN010141/DR/7.3]** includes for pre-construction surveys, including for arable flora in line with Cambridgeshire County Council comments presented in Table 7.4
Cambridgeshire County Council	The importance of the site for breeding birds had not been adequately considered. The site has the potential to support breeding birds of county importance (Criteria 9bi, Cambridgeshire & Peterborough County Wildlife Site Selection Criteria 2023– Version 7.3).	Breeding birds have been assigned 'up to county' importance and taken forward for assessment. This remains as it was within the PEIR.
Cambridgeshire County Council	No consideration is given to the implications for incomplete wintering birds surveys that were undertaken, with no surveys completed in October. The Council would expect a fully survey season to have been completed.	Wintering bird surveys have been completed covering November 2021 to March 2022 and also November 2023 to March 2024. While October was not surveyed, it is considered that adequate baseline information has been gathered to assess the importance of the Site to wintering birds given the absence of any internationally important designated site for nature conservation with non-breeding bird qualifying features (i.e., SAC, Special Protection Area (SPA), or Ramsar Wetland). Natural England have stated through Discretionary Advice Service (DAS) consultation that risk to Grafham Water SSSI is considered low.
Cambridgeshire County Council	The Councils expects detailed surveys be completed for trees identified as “possessing potential roost features (PRF) of up to PRF-M”	In line with Collins (2023) only trees subject to impacts require detailed survey. As set out in **ES Vol 2**

Consultee	Summary of Comments	Response to Consultee
	within the site, as well as any trees within close proximity to the site.	**Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]**, no trees are scheduled for removal and all other works are considered sufficiently low impact that no further survey is required. Suitable protection measures have been implemented through the embedded **oCEMP [EN010141/DR/7.3]** including pre-construction survey and sensitive construction methods.
Cambridgeshire County Council	The Council is concerned that comprehensive surveys of ponds for Great Crested Newts has not been completed, including lack of surveys of pond (P43) located within the Application site. Details surveys must be completed on all three ponds identified on-site and the 23 ponds identified within 250m of the Application site.	All ponds within the Site have been subject to survey during 2025. Access was not available to third party land outside of the Site and as such not all ponds up to 250m could be surveyed. Desk study information has been utilised alongside a precautionary approach to inform the assessment
Cambridgeshire County Council	It is unclear why reptiles surveys have not been completed, given the presence of suitable habitat, including 'other neutral grassland' within Site C (PEIR Figure 7-3 Habitat Survey).	Habitat is considered sub-optimal for reptiles and few desk study records relating to this species group were identified. Further, suitable habitats which are restricted to field margins will be largely retained and protected throughout construction and operation of the Scheme. As a precaution, suitable protection measures have been implemented through the embedded **oCEMP [EN010141/DR/7.3]** including pre-construction survey and sensitive construction methods.
Cambridgeshire County Council	It is unclear why detailed water vole and otter surveys have not been completed, particularly where the scheme will impact watercourses and adjacent habitat, and potentially pond	Targeted water vole and otter surveys have been completed. Further, suitable protection measures are included within the **oCEMP**

Consultee	Summary of Comments	Response to Consultee
	P43. It will be important to confirm whether there will be any impacts because currently, there is no proposal within the OLEMP to provide watercourses enhancement and as such, no scope to mitigate losses of water vole / otter habitat.	**[EN010141/DR/7.3]** including pre-construction surveys of suitable aquatic and terrestrial habitats.
Cambridgeshire County Council	It is unclear why detailed water vole surveys have not been completed, particularly where the scheme will impact watercourses and potentially pond P43. It will be important to confirm whether there will be any impacts because currently, there is no proposal within the OLEMP to provide watercourses enhancement and as such, no scope to mitigate losses of water vole habitat.	Targeted water vole and otter surveys have been completed. Further, suitable protection measures are included within the **oCEMP [EN010141/DR/7.3]** including pre-construction surveys of suitable aquatic and terrestrial habitats.
Cambridgeshire County Council	There are no recorded white-clawed crayfish records. However, occasionally small remnant populations have been found. We are therefore unclear why eDNA surveys were not completed to confirm their absence.	eDNA surveys for white clawed crayfish are not yet approved for the purposes of proving presence/ likely absence for development purposes. Further, suitable aquatic habitats are to be retained and protected throughout construction and operation of the Scheme, with localised crossing points situated primarily in watercourses and ditches lacking the rocky substrate typically required by this species. As a precaution, suitable protection measures are included within the **oCEMP [EN010141/DR/7.3]** including pre-construction surveys of suitable aquatic habitats.
Cambridgeshire County Council	Given the present of notable flora records within woodland on Site C, we expect detailed botanical surveys to be completed to confirm its current condition and identify opportunities for enhancement.	Woodland will be retained and protected throughout construction and operation of the Scheme with no impacts to the woodland itself or notable flora within.

Consultee	Summary of Comments	Response to Consultee
Cambridgeshire County Council	Insufficient evidence has been provided to demonstrate that the scheme will have no impact on Huntingdon Wood CWS. We note that a 15m buffer zone is shown on the Figure 2-2 Illustrative Environmental Masterplan. However, no consideration has been undertaken as to the hydrological impact of digging a trench onto the underlying ground water etc. and the impacts that could have on the woodland.	Tree protection plans, including ancient woodland buffer zones, are provided as part of **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]**.
Cambridgeshire County Council	No consideration has been given to direct or indirect impact of installation of the cabling route on pond P43, particularly any hydrological impact.	Impacts to ponds, including P43 are assessed in Section 7.8. No adverse hydrological impacts are anticipated given the works proposed at this location.
Cambridgeshire County Council	It is disappointing that no consideration has been given to the usage of the site by otters beyond 8m of the watercourses. Further survey work is required to identify potential locations of couches, lay-ups etc that should be excluded.	Taking into account the proposed scale of works, further survey for otter (and water vole) has been undertaken on land up to 100m from proposed crossing points. Further, the embedded **oCEMP [EN010141/DR/7.3]** includes pre-construction surveys of suitable aquatic and terrestrial habitats to identify resting sites. The **oCEMP [EN010141/DR/7.3]** also includes the requirements for licencing where there is the potential for impact to resting sites.
Cambridgeshire County Council	No consideration is given the impact of noise pollution from the BESS on barbastelle bats	Consideration of noise impacts to foraging and commuting bats, including barbastelle, is included within the assessment at Section 7.8 of this chapter and also within the **Information to Inform Habitats Regulations**

Consultee	Summary of Comments	Response to Consultee
		Assessment [EN010141/DR/5.7].
Cambridgeshire County Council	The Council requires further evidence to demonstrate how the scheme will mitigation impacts to displacement of ground nesting birds, particularly those associated with nesting in open habitats (e.g. skylarks) because we cannot fin how large areas of open grassland will be managed for "to be of benefit for skylark and lapwing and to encourage nesting attempts within these areas" within the OLEMP. The OLEMP states that the aim of 'Proposed Grazing Pasture or Neutral Grassland' will be grazed pasture with "suitable foraging (and potentially breeding) habitat for grassland birds such as skylark", however, these areas are proposed within solar arrays and therefore unsuitable as nesting habitat for skylarks. While the 'Proposed Diverse-Species Grassland', which will provide large areas of open grassland, are only to be only managed as foraging habitat (para 5.2.7 & 5.2.9, Appendix 2-2, OLEMP). We assume management requirements within the Schedule Monument for archaeology may also restrict its ability to support nesting habitat. We therefore require much greater details as to how the habitats will be management and realistically, how many breeding pairs (nest sites) can be achieved within the scheme. Any adverse impacts should be mitigated through creation of additional land for nesting farmland birds within the scheme. Any residual impacts should be addressed through off-site compensation scheme for farmland birds.	Mitigation for ground nesting birds will be implemented principally through the provision of high quality species diverse grassland which will increase foraging suitability as well as offering nesting habitat. Details of management of such habitat are provided within the embedded **oLEMP [EN010141/DR/7.7]**.
Cambridgeshire County Council	The Council agrees that the displacement of ground nesting species as a result of panels will result in an adverse effect to ground nesting birds. However, the	Impacts have been assessed in line with CIEEM guidance on Ecological Impact Assessment with the assessment methodology,

Consultee	Summary of Comments	Response to Consultee
	magnitude and significance of this impact to have been undervalued.	including definition of magnitude and significance provided as Section 7.4. Impacts to ground nesting bird species have been assessed considering embedded measures within the **oLEMP [EN010141/DR/7.7]** and also the national and county (where data is available) populations and trends of the species.
Cambridgeshire County Council	The impact of noise pollution, as a result of the BESS, on breeding bird should also be considered, particularly if it is to be located immediately adjacent to woodland within Site C.	The BESS location has been confirmed as Site D which is considered less impactful on breeding birds. Noise impacts are considered to be localised around this environment but are addressed within this chapter.
Cambridgeshire County Council	The impact of noise pollution, as a result of the BESS, on bats should also be considered.	Consideration of BESS noise is included within the assessment and also within the **Information to Inform Habitats Regulations Assessment [EN010141/DR/5.7]**.
Cambridgeshire County Council	This great crested newt assessment is based on incomplete survey work. Great crested newt assessment of pond P43 (on-site) and an additional 12 ponds (located within 250m) were not completed due to access restrictions. These must be completed. If not, as a precaution, the issue should be addressed through a District Level License application (if applicable).	All ponds within the Site have been subject to survey during 2025. Access was not available to third party land outside of the Site and as such not all ponds up to 250m could be surveyed. Desk study information has been utilised alongside a precautionary approach to inform the assessment. Due to presence of great crested newt in ponds in proximity to works a licence would be obtained prior to works as is included within the embedded **oCEMP [EN010141/DR/7.3]**. Due to the cross boundary location of the Site covering two

Consultee	Summary of Comments	Response to Consultee
		different licencing schemes and nature of the scheme involving primarily temporary impacts It is proposed that a traditional licenced method statement is obtained from Natural England, instead of the District Level Licence Approach.
Cambridgeshire County Council	Given the proposal will result in adverse impacts to (albeit short) sections of in-channel habitat, we would except mitigation to also include enhancement to in-channel & bank side habitat for water vole.	Targeted water vole and otter surveys have been completed. Further, suitable protection measures are included within the **oCEMP [EN010141/DR/7.3]** including pre-construction surveys of suitable aquatic and terrestrial habitats.
Cambridgeshire County Council	No consideration has been given for adverse impact of solar arrays on the lifecycle of invertebrate species that may lay eggs on the solar panels. Consideration of aquatic invertebrates of the rivers drains, standing water and swamp (e.g. Moor Road Marshy Fields CWS) located within and adjacent to the Application site, particularly species with lifecycles that can be adversely impacted by solar panels.	Citation data provided for Moor Road Marshy Fields does not cite invertebrates as a reason for designation. This site is over 250m from the Site and as such is considered sufficiently distanced that adverse impacts to egg laying invertebrates is unlikely to occur. This impact is not well studied, particularly in the UK, however appears to affect predominantly species which lay eggs on water such as mayfly, and caddisfly, and not species of marshy grassland such as at Moor Road Marshy Fields CWS. Regarding larger watercourses, embedded offsets of at least 10m between watercourses and solar panels will alleviate impacts on aquatic invertebrates
Cambridgeshire County Council	This assessment is considered inaccurate given that the oDEMP only confirms that woodland and trees will be retained and therefore grassland habitats to be created and	The **outline Decommissioning Environmental Management Plan [EN010141/DR/7.6]** includes

Consultee	Summary of Comments	Response to Consultee
	managed through the operational stage and recorded as delivering up to moderate beneficial effect (significant) on a range of protected species, including reptiles, amphibians and bats during the operational phase will be lost. Therefore, the decommissioning phase should accurately reflect the loss of these habitats, based on the assumption of their condition to be created within 40 years. The Council is of the view that all habitat that provides significant benefit to protected species and/or delivers priority habitat, or habitat of district/county importance should be retained in perpetuity	measures to avoid and/ or minimise harm to ecological receptors. Decommissioning will be undertaken in line with all legislation relevant at the time.
Cambridgeshire County Council	The Council is concerned that habitat surveys have not been completed for the entire site. There appears to have been no surveys of the cabling or access routes or around Eaton Socon. In addition, the report doesn't provide description / assessment of all habitats shown on the PEIR Figure 7-3 Habitat Survey, for example other neutral grassland, while the habitat shown in orange is unknown.	Habitat surveys have been updated since publication of the PEIR. While not all areas of the Site have been available to access, surveys have covered the vast majority of the Site. Limitations, including lack of access are addressed in **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**, however a precautionary approach has been taken to assessing habitats including assessment from aerial imagery supported by pre-construction surveys.
Cambridgeshire County Council	The Council is concerned that comprehensive surveys for wintering bird was not completed	Wintering bird surveys have been completed covering November 2021 to March 2022 and also November 2023 to March 2024. While October was not surveyed, it is considered that adequate baseline information has been gathered to assess the importance of the Site to wintering birds given the absence of any internationally important designated site for nature conservation with non-

Consultee	Summary of Comments	Response to Consultee
		breeding bird qualifying features (i.e., SAC, SPA, or Ramsar Wetland). Natural England have stated through DAS consultation that risk to Grafham Water SSSI is considered low
Cambridgeshire County Council	The Council is concerned that the Illustrative Environmental Masterplan fails to adequately mitigation / compensate for the loss of nesting habitat for ground-nesting birds. The scheme must be redesigned to fully compensate for this impact, through removal of solar panels, better proposed management of land for these birds, or expansion of red-line boundary to include habitat to accommodate these birds. If this is not possible, then any residual effect should be resolved through the development of a comprehensive off-site compensatory farmland bird scheme, secured through Section 106. Pond 43 (Figure 7-7 Location of Ponds) is located along the alignment of the cable route between Site D and Eaton Socon substation. No production measures (e.g. buffer zone) has been identified in the Illustrative Environmental Masterplan (Figure 2-2o). Further evidence is required to demonstrate that the installation of the cable will impact the pond either directly (digging within the pond) or indirectly (affecting hydrology and water quality /quantity) of the hydrology of the pond. It would be helpful to identify the land that will be managed as nesting habitat for farmland birds of open habitat (e.g. skylarks)	Mitigation for ground nesting birds has taken an alternative approach to skylark plots. Instead, the provision of high quality species diverse grassland will increase foraging suitability as well as offering nesting habitat. It should be noted that skylark plots are intended to provide 'landing pads' to access foraging land amongst crops and not to provide nesting locations. As such, provision of managed species diverse grassland offers both foraging and nesting habitat. This is further discussed in relation to ground nesting birds at Section 7.8.
Cambridgeshire County Council	It would be helpful for all wildlife sites to be named - Moor Road Marshy Fields County Wildlife Site located south of site C is not labelled.	Figures have been updated to reflect this.

Consultee	Summary of Comments	Response to Consultee
Cambridgeshire County Council	We are concerned that Figure 7-3 shows that habitat surveys have not been completed across the entire site (e.g. access and cabling route and Eaton Soton substation). It is unclear what 'solid orange' areas indicate, while pond (P43), watercourse across Site C, woodland / trees in Site D (shown on Google Earth) and hedgerows are not shown. A 'zoomed in' version of each site should be provided, so that it's easier to identify the type and extent of these habitats.	Habitat surveys have been updated since publication of the PEIR. While not all areas of the Site have been available to access, surveys have covered the vast majority of the Site. Limitations, including lack of access are addressed in **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**, however a precautionary approach has been taken to assessing habitats including assessment from aerial imagery supported by pre-construction surveys. **ES Vol 3 Figure 7-3: Baseline Habitats [EN010141/DR/6.3**] has been updated to address this comment.
Cambridgeshire County Council	The Council welcomes the preparation of the Outline Landscape and Ecological Management Plan, however we are concerned that it doesn't fully address adverse impact to biodiversity (particularly farmland birds), nor does it propose to enhance all existing habitats (e.g. ditches) present within the Application Site. Further detail is also required to ensure the scheme is resilient to climate change and reflective of local landscape character. The development of the Landscape and Ecological Management Plan and its implementation should be overseen by a steering group, comprising local authority officers (landscape, ecology, archaeology, rights of way etc.) and local interested groups (e.g. Wildlife Trust) and local experts to advise on	The **oLEMP [EN010141/DR/7.7]** includes measures to enhance the Site for biodiversity, including for farmland birds. The **oLEMP [EN010141/DR/7.7]** includes the management of ditches and watercourses. The Scheme will result in a biodiversity net gain across area based habitats, hedgerows and watercourse as evidenced by the **Biodiversity Net Gain Report [EN010141/DR/7.17].** The **oLEMP [EN010141/DR/7.7]** includes the creation of a Steering group to which relevant local authority and interested groups will be invited. It is anticipated that advance seeding will occur to ensure

Consultee	Summary of Comments	Response to Consultee
	monitoring and management of the site throughout the 40 years. Funding for this group should be secured as part of this planning application. All compensatory habitat must be created prior to the removal of existing habitats for protected / notable species, for example nesting habitat for ground-nesting birds. More details below	habitats are able to establish prior to the onset of construction, however some landscaping works will need to be phased.
	4.2.15 - greater consideration must be given for protection of ground-nesting birds that may nest on areas of bare earth / arable fields during construction phase.	The **oCEMP [EN010141/DR/7.3]**. includes the requirement for an EcoCoW to be appointed for the duration of works and for pre-construction surveys.
	4.2.18 - we are concerned that trees present within the site, which has the potential to be removed as part of the scheme, have not been surveyed to identify them to support roosting bats.	In line with Collins (2023) only trees subject to impacts require detailed survey. As set out in **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]**, no trees are scheduled for removal
	4.2.26 - any works within 10m of the ditch bank should be subject to a pre-construction inspection	Ditches and watercourses include minimum 10m buffer zones, with the exception of localised crossing points. These crossings will be subject to pre-construction surveys as specified in the **oCEMP [EN010141/DR/7.3]**.
	4.3.5, 4.3.7, 4.3.13 & 4.3.18 - in Cambridgeshire, we have seen high failure rates of new hedgerows and tree planting as a result of dry conditions. It is important that planting is completed in Oct – Dec, so allow establishment before any dry weather (from spring onwards). Consideration should also be given to usage of cellular rather than bare-root stock. 5.5.2, 5.5.13 & 5.5.24 - in	The **oLEMP [EN010141/DR/7.7]** specifies timescales for hedgerow and tree planting and contingency measures in the event of failure.

Consultee	Summary of Comments	Response to Consultee
	Cambridgeshire, we have seen high failure rates of new hedgerows and tree planting as a result of dry conditions. A comprehensive watering programme must be implemented for all new planting during the establishment phase. 4.3.4 – 4.3.17 - the proposed woodland planting stock list should be further discussed with local authorities. Species should be chosen that are characteristic of the local landscape and resilient to climate change. Opportunities should be taken to incorporate locally important species, include native black poplar and Huntingdonshire elm (resilient to Dutch elm disease) 5.2.5 - hedgerow management should also be managed for the benefit of farmland birds, particularly those that nest in hedgerow / mature scrub (turtle dove). 5.2.7 - we understand the proposed grazed pasture / neutral grassland is proposed within the fields with solar arrays, which are highly unlikely to provide suitable breeding habitat for ground-nesting species. Therefore, suggest Is considered unlikely that grassland within the solar panel arrays will provide suitable breeding habitat for ground-nesting birds. Suggest reference to breeding habitat is removed, unless evidence can be provided to substantiate these claims. 5.3.2 - gap should be provided within the fence line, or fences raised off the ground, to allow access to solar array fields by mammals. However, it should also be confirmed that no mammal access should be provided within areas identified as potential nest sites for ground-nesting bird, to help control predation and maximise successful fledging. 5.4.9 - existing ditches should be managed sensitively for wildlife as	The species suggested have been included, alongside a range of other species representative of the locality Management of habitats (including hedgerows) will result in an overall gain for biodiversity including farmland bird species. Reference to ground nesting birds breeding amongst panels is not included. Such species will however nest within open areas of grassland proposed. The fence line will include regularly spaced mammal gaps to allow access for mammals.

Consultee	Summary of Comments	Response to Consultee
	part of the scheme. This should be included within the OLEMP. 6.1.2 - the Council is concerned that after decommissioning, habitats of important for biodiversity, including species-rich grassland and well as any other habitats of local / county value which have developed through the lifetime of the scheme, may be lost following returning land to the landowner. This would effectively result in a loss of biodiversity value as a result of decommissioning and therefore, the Council seeks these habitats are retained in perpetuity. The OLEMP does not consider the management restrictions of schedule monument to protect its archaeological interest. Confirmation sought as to how the grassland can be managed for nesting ground birds and archaeological interest	On decommissioning the land would be returned to the landowner with landscaping works left in place On decommissioning the landscaping would be left in place and the land handed back to landowners, the only exception being the potential requirement by landowners to revert the areas currently used for arable farming to be returned to this condition. As the land would be handed back to the landowners on completion of decommissioning, the long-term retention of the landscaping improvement works cannot be guaranteed.
Cambridgeshire County Council	The ecological mitigation set out in Table 5.3 [of the PEIR] is very brief and should be expanded. Greater consideration should be given to impacts of water pollution, particularly on pond P43. More detailed methodology for pre-commencement surveys should be provided, for example – what length of watercourse will be addressed for water vole? Compensatory habitat must be constructed prior to commencement of habitat destruction works.	Ecological protection, mitigation and enhancement measures are set out in the **oCEMP [EN010141/DR/7.3]**. and **oLEMP [EN010141/DR/7.7],** as well as in Section 7.9 of this chapter. This includes pre-commencement surveys. This chapter includes an assessment of impacts to on-Site and off-site habitats, including of water pollution.
Cambridgeshire County Council	The Council welcomes confirmation that woodland, hedgerow and tree planting will be retained as part of the decommissioning process. However, the Council is concerned that other habitat, that may have developed into priority habitat or habitat of district / county importance, supporting notable species or provided as ecological mitigation, will be removed during the decommissioning process. This would include habitat that has been provided to secure up to moderate benefits to protected	On decommissioning the landscaping would be left in place and the land handed back to landowners, the only exception being the potential requirement by landowners to revert the areas currently used for arable farming to be returned to this condition. As the land would be handed back to the landowners on completion of decommissioning, the long-term retention of the

Consultee	Summary of Comments	Response to Consultee
	species throughout the operational phase. Therefore, the Council considers it appropriate to seek retention of priority habitat or habitat of district / county importance, or supporting notable species, that have developed on the site. The DEMP should also consider long-term management of this habitat and how it will be achieved	landscaping improvement works cannot be guaranteed

7.4 Assessment Methodology

7.4.1 The assessment presented within this chapter has been undertaken with reference to applicable wildlife and countryside legislation, national and local planning policy and the CIEEM (2018) guidance[20]. The assessment methodology also reflects the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') and focuses on those activities that could potentially generate significant effects on ecological and ornithological features.

7.4.2 Ecological Impact Assessment ('EcIA') is defined within the CIEEM guidelines as:

> *'…a process of identifying, quantifying and evaluating the potential effects of development-related or other proposed actions on habitats, species and ecosystems'.*

7.4.3 The assessment presented within this chapter and associated technical appendices therefore includes:

- A description of baseline ecological and ornithological conditions;
- An evaluation of identified important ecological and ornithological features;
- A description and evaluation of the potential effects of the Scheme;
- Mitigation measures implemented to address any identified significant adverse effects;
- An assessment of cumulative effects;
- Identification of any residual effects after mitigation; and
- Identification of opportunities for biodiversity enhancement.

7.4.4 For the purpose of the assessment, the terms 'impacts' and 'effects' are referred to in accordance with the definitions set out in CIEEM guidance as follows:

> *Impact: Actions resulting in changes to an ecological feature, for example, removing a hedgerow; and*

Effect: Outcome to an ecological feature from an impact, for example, the changes experienced by the local population of a species arising from the loss of the hedgerow.

Zones of Influence

7.4.5 The 'zone of influence' for a development is the area over which ecological and ornithological features may be affected by biophysical changes as a result of the development and associated activities.

7.4.6 The zones of influence for the Scheme are acknowledged to extend beyond direct land-take required and have been identified in view of the nature of the Scheme as described in **ES Volume 1 Chapter 2: The Scheme [EN0101041/DR/6.1]**, the consultation and Scoping process, and the current CIEEM and Natural England (NE) guidance as applicable and available.

7.4.7 The zone of influence will therefore vary for different ecological and ornithological features depending on their sensitivity to environmental change.

7.4.8 Zones of influence for the Scheme and within which baseline information has been established have therefore been identified on the basis of proximity to the Site as follows:

- **Statutory designated sites** – searches made for information on statutory designated sites (internationally and nationally important sites for ecology) within 5 km of the Order Limits, extended to 10 km for Ramsar sites, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), or 30km for SAC with bat qualifying features;
- **Non-statutory designated sites** – Searches for sites within 2 km of the Order Limits;
- **Protected and priority habitats and species** - (e.g., Natural Environment and Rural Communities Act 2006 Section 41 Species of Principal Importance and Priority Habitats). Searches for biological records within 2km of the Order Limits;

- **Habitats** - Land within the Site and immediately surrounding habitats;
- **Breeding Birds** - Land within the Site and up to 100m for potential disturbance of sensitive species;
- **Wintering Birds** - the Site and surrounding fields up to 600m from the Site;
- **Water Vole and Otter** - Ditches and watercourses within and adjacent to the Site, extended to suitable aquatic and terrestrial habitat within 200m up/ downstream for otter;
- **Badger** - Land within the Site and immediately surrounding habitats;
- **Great Crested Newt** – the Site and suitable terrestrial and aquatic habitats up to 500m from the Order Limits;
- **Reptiles** - Land within the Site and immediately surrounding habitats; and,
- **Invertebrates** – Land within the Site and immediately surrounding habitats.

7.4.9 It should be noted that the Zone of Influence may not equate to the extent of baseline ecological survey, but is the area in which impacts to a given receptor could be reasonably expected to occur.

Assessment of Significance

7.4.10 The EIA Regulations require the ES to include information that 'is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development) (Regulation 14(2)(b)).

7.4.11 To determine the overall significance of each ecological effect, judgements on the sensitivity of the receptor(s) and the magnitude of impact from the Scheme are considered together in order to determine whether or not an effect is likely to be significant. This involves a combination of quantitative and qualitative assessment and the application of professional judgement.

7.4.12 For the purposes of the ES, effects will be categorised as 'significant' or 'not significant', in line with the EIA Regulations. The assessment considers effects at different geographic scales i.e. where effects may be discernible at

a local scale but are not considered significant in the context of the EIA Regulations. For the purpose of the assessment, moderate and major effects are deemed to be 'significant' in EIA terms unless stated otherwise.

7.4.13 A 'significant effect' is considered to be one that either supports or undermines biodiversity conservation objectives for 'important ecological features', or for biodiversity in general.

7.4.14 CIEEM guidelines on ecological impact assessment note that:

> *'A significant effect does not necessarily equate to an effect so severe that consent for the project should be refused planning permission. For example, many projects with significant negative ecological effects can be lawfully permitted following EIA procedures.'*

7.4.15 For ease of reference, Table 7.6 sets out the adapted CIEEM terminology, which also shows the equivalent EIA terms to be used in this assessment.

Table 7.6: Summary of significance Levels

Effect (Standard EIA-related terminology and associated assigned significance)		**Equivalent CIEEM terminology adapted for Ecological Assessment**
Negligible Effects	Neutral	No discernible or significant effects on ecological integrity or conservation status (e.g. species or habitat).
Minor Effects	Not Significant	Adverse or beneficial effects on ecological integrity or conservation status, discernible/significant in ecological terms at a Local geographic scale only.
Moderate and Major Effects	Significant	Adverse or beneficial effects on ecological integrity or conservation status at a County, National or International geographic scale.

7.4.16 The Scheme has been assessed on the basis of an operational lifespan of up to 40 years. Ecological effects will be described in terms of their duration as short, medium term and long-term as follows:

- Short term effects are defined as 0 - 3 years;

- Medium term effects are defined as 3 - 10 years; and
- Long term effects are defined as > 10 years.

7.4.17 For the purposes of the assessment the importance or sensitivity of an ecological feature will be considered within the context of a defined geographical area, ranging from International (high value) to Site (low/negligible), as detailed in Table 7.7.

Table 7.7: Sensitivity of Receptors

Value or Sensitivity of Receptor / Geographic Scale of Importance	Definition Examples
High - International / European	Greater than a UK scale, typically valued at a European level such as internationally designated sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and/ or Ramsar sites) or proposed/candidate site (pSPA or cSAC), large area of a habitats listed in Annex I of the Habitats Directive[21] or smaller areas of such habitat which are essential to maintain the viability of the larger whole, large population of an internationally important species or site supporting such a species (or supplying a critical element of their habitat requirement) or species listed in Annex IV of the Habitats Directive.
High - National (England/UK)	England/UK: A nationally designated site (e.g., Site of Special Scientific Interest) or a discrete area which meets the selection criteria for national designation. An area of a priority habitat listed under the Section 41 of the NERC Act 2006 which constitutes a significant proportion of the resource of that habitat in England or the UK as a whole. A regularly occurring, regionally significant population of any nationally important species listed as a UK BAP / Biodiversity List and priority species listed under the Section 41 of the NERC Act 2006, and Species listed under Schedule 1 or Schedule 5 of the Wildlife and Countryside Act 1981 or Annex II or Annex IV of the Habitats Directive.
Medium - Regional / County (Cambridgeshire and/ or Bedfordshire	Locally designated sites (Local Nature Reserves, County or Local Wildlife Sites). Areas of priority habitat, which constitute a significant proportion of the County's resource of that habitat. A regularly occurring, locally significant population of any nationally important species listed as a UK BAP / priority species and priority species listed under Section 41 of the NERC Act 2006, and Species listed under Schedule 5 of the

Value or Sensitivity of Receptor / Geographic Scale of Importance	Definition Examples
	Wildlife and Countryside Act 1981 or Annex II or Annex IV of the Habitats Directive.
Low - Local	Local area around the Site. For example, areas of priority habitat which are not large enough to meet the criteria for County value, or small but sustainable populations of a protected or notable species.
Low/Negligible - Site	Within the Site. Features present but of value in relation to the Site only.

7.4.18 Effects on ecological features will be assessed based upon the interaction between the importance, or sensitivity, of the feature and the magnitude of change it is likely to experience. In accordance with the CIEEM guidelines (2018), an EcIA need only assess in detail, impacts upon important ecological features i.e., those that are considered important and potentially affected. It is not necessary to carry out detailed assessment of features that are sufficiently widespread, unthreatened and resilient to project impacts and will remain viable and sustainable. Where ecological features are not considered important enough to warrant further consideration, or where they will not be significantly affected (adversely or beneficially), these are scoped out of the assessment process, and justification for exclusion is provided.

7.4.19 Relevant European, national and local guidance from governments and specialist organisations will be referred to in order to determine the importance (or 'sensitivity') of ecological features. Importance will also be determined using professional judgement and taking account of the results of baseline surveys and the functional role of features within the context of the geographical area.

7.4.20 Importance does not necessarily relate solely to the level of legal protection that a feature receives, and ecological features may be important for a variety

of reasons, such as their connectivity to a designated site and the rarity of species or the geographical location of species relative to their known range.

7.4.21 Once identified, potential impacts are described making reference to the following characteristics as appropriate: positive or negative, extent, magnitude, duration, timing, frequency and reversibility. The judgements on magnitude may need to be adjusted (either up or down) to reflect the duration of the change (i.e. short, medium or long term) and whether it is potentially reversible. The assessment also identifies areas where no change is anticipated, and the resulting effect is described as 'not discernible' or 'none'.

7.4.22 Ecological effects are described, as far as possible, in terms of the parameters detailed in Table 7.8, where available information allows.

7.4.23 Magnitude of impact, based on the effects that the Scheme would have upon the resource/receptor, is considered within the range of high, medium, low, negligible. Consideration is given to scale, duration of impact (and extent of Scheme with reference to the definitions in Table 7.8). The assessment will consider how existing baseline conditions may change over time, as for example the baseline conditions could alter through operational land use, in the form of differing management and natural growth or succession of habitats.

Table 7.8: Characterising Ecological Impacts

Parameter	Definition
Magnitude	The ‘size’ or amount of the effect is referred to as the magnitude and is determined on a quantitative basis where possible supported by professional judgement.
Extent	The area over which an effect occurs. The magnitude and extent of an effect may be synonymous
Duration	The time over which an effect is expected to last prior to the recovery or replacement of the ecological receptor. This can be considered in terms of life cycles of species or regeneration of habitats. The duration may be longer than the duration of an activity.

Parameter	Definition
Reversibility	Reversible (or temporary) effects are those that occur during the lifetime of the development and where spontaneous recovery, or mitigation allows recovery within a reasonable timescale. Permanent effects are those which cannot be recreated within the proposed development or there is no reasonable chance that actions can be undertaken to reverse it.
Timing and Frequency	The timing of effects in relation to important seasonal and/or life cycle constraints. The frequency with which activities and simultaneous effects would take place can be an important determinant.

7.4.24 The assessment of effects is based upon the assessments of magnitude of impacts and sensitivity of the resource/receptor to come to a professional judgement of how important the effect is. The magnitude of impact on ecological receptors is described as set out in Table 7.9. The likelihood or probability that an effect will occur is addressed as far as possible based on available information. Whilst it is reasonably straightforward to identify effects that are certain to occur, or conversely will not occur, it is generally more difficult to assign a quantified level to occurrences defined as likely, unlikely or highly unlikely. In these circumstances, professional judgement has been used, with reasoning supported by available evidence.

Table 7.9: Magnitude of Impact

Magnitude	Criteria
High	The change may negatively or positively affect the conservation status of a site or species population, in terms of the coherence of its ecological structure and function, that sustains the habitat, complex of habitats and/or the population levels of species of interest.
Moderate	Conservation status of a site or species population will not be negatively or positively affected, but some element of the functioning of the site or population might be affected and the change to the site/ population is likely to be significant in terms of its ability to sustain some part of itself in the long term.
Low	Neither of the above applies, but some minor negative or positive change is evident on a temporary basis, or the change affects extent of habitat or individuals of a species abundant in the local area.
Negligible/ Neutral	No observable effect in either direction

7.4.25 For an effect to be significant, the ecological integrity or conservation status of a sensitive feature must be influenced in some way (negatively or positively). It may be that the effect is substantial in magnitude or scale, irreversible, has a long-term effect, or coincides with a critical period in a species' lifecycle. Where uncertainty or limitations exist, this is acknowledged.

7.4.26 It is recognised that discernible effects can also occur at a local geographic scale which are not sufficiently severe to be assessed as 'significant' in accordance with the EIA approach, and do not require specific mitigation, but nonetheless merit discussion. In the interest of completeness these effects have been discussed within this chapter in relation to general construction good practices to be adopted to avoid or minimise low-level or minor disruption to local features, including for example standard pollution prevention and control measures.

Baseline Data Gathering

7.4.27 Detailed survey methodologies and limitations are presented in the following appendices:

- **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-2: Breeding Bird Survey Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-3: Wintering Bird survey Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-4: Confidential Badger Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-5: Great Crested Newt Survey Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 7-6: Otter and Water Vole Survey Report [EN010141/DR/6.2]**; and
- **ES Vol 2 Appendix 7-7: Bat Survey Report [EN010141/DR/6.2]**.

Desk Study

7.4.28 A desk study was undertaken to identify existing information on the presence of designated sites for nature conservation, protected and notable species and habitats within proximity to the Site as follows:

- Statutory designated sites for nature conservation, within 5km of the Site, extending to 10km for internationally protected sites, or 30km for internationally protected sites with bat qualifying features;
- Non-statutory designated sites for nature conservation within 2km of the Site; and,
- Existing records of priority habitats and protected and notable faunal species (dated within the last 10 years), within 2km of the Site.

7.4.29 The following key sources were consulted:

- Natural England and Joint Nature Conservation Committee (JNCC) websites;
- The Multi Agency Geographic Information for the Countryside (MAGIC) website;
- District Level Licencing Data;
- England Peat Map;
- The Woodland Trust Ancient Tree Inventory website;
- Bedfordshire and Luton Biodiversity Recording and Monitoring Centre (BLBRMC); and,
- Cambridgeshire and Peterborough Environmental Records Centre (CPERC).

7.4.30 Full details of the desk study methodology are provided in **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**.

Habitat Surveys

7.4.31 Habitat Surveys have been undertaken between April 2022 and July 2025. Surveys have comprised a preliminary ecological appraisal undertaken in April 2022 using the JNCC Phase 1 habitat survey methodology and habitat

surveys using the Habitat Survey methodology. All surveys were extended to record the presence, or potential of, protected or notable species through the use of target notes.

7.4.32 All surveys have been undertaken by suitably competent and qualified ecologists in accordance with industry standard guidance.

7.4.33 Full details of the habitat survey methodology are provided in **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**.

Species Surveys

7.4.34 The following detailed field surveys have been undertaken to date, to establish the protected species baseline within the Site:

- Wintering Bird surveys (November 2021-March 2022 and November 2023 - March 2024);
- Breeding bird surveys (April 2022- June 2022, May 2023 - July 2023, April 2023 – June 2024 and April - July 2025);
- Great crested newt eDNA survey (June 2022 and June 2025);
- Badger survey (March 2023 – July 2025);
- Bat activity surveys (October 2023 to September 2024); and
- Otter and water vole survey (July 2025).

7.4.35 Protected species survey methodologies are described in **ES Vol 2 Appendix 7-2 to 7-7 [EN010141/DR/6.2]**.

7.5 Assumptions and Limitations

7.5.1 Due to access restrictions, detailed survey of the Cable Corridor Site B to Site C, Cable Corridor Site C to Site D and land at Eaton Socon Substation have not yet been undertaken. These areas have been assessed from a combination of publicly available aerial imagery, site observations and other data sources. A precautionary approach has been taken to the assessment.

7.5.2 There are no further substantive limitations to the ecological assessment process recorded at this stage.

7.6 Baseline Conditions

7.6.1 This section provides a summary of the baseline conditions of the Site and study areas. Baseline conditions are described in full in **ES Vol 2 Appendix 7-1 to 7-7 [EN010141/DR/6.2]**.

Desk Study

Statutory Designated Sites for Nature Conservation

7.6.2 No international statutory designated sites for nature conservation were identified within 10km of the Order Limits, however Eversden and Wimpole Woods Special Area of Conservation (SAC), which features barbastelle bat as a qualifying feature is located within 30km of the Site.

7.6.3 Eighteen national statutory designated sites for nature conservation are located within 5km of the Site, the closest being Swineshead Wood SSSI, located approximately 925m north-west. A summary of statutory designated sites is given in Table 7.10 and shown on **ES Vol 3 Figure 7-1a to 7-1c [EN010141/DR/6.3]**.

Table 7.10: Statutory designated Sites for Nature Conservation

SSSI: Site of Special Scientific Interest; LNR: Local Nature Reserve; SAC: Special Area of Conservation.

Site Name	Approximate Distance and Direction from Site	Description
Swineshead Wood SSSI	900m north	An ancient ash/maple woodland with structural and biological diversity. Historically managed as coppice with standards. Contains a rich flora.[2]
St. Neot's Common SSSI	1.57km east	A riverside common with alluvial grassland and associated ponds, ditches and willow carr. The grassland remains under the traditional management and has a species-rich sward.

[2] https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1001520&SiteName=swine&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

Site Name	Approximate Distance and Direction from Site	Description
		Contains diverse invertebrate and amphibian populations. [3]
Little Paxton Wood SSSI	1.58km north-east	A wet ash-maple woodland, which have undergone a significant national decline. Historically managed as a coppice-with-standards. Has extremely diverse flora which includes one nationally restricted species (spiked star-of-Bethlehem *Ornithogalum pyrenaicum*), as well as a number of species which are of very local occurrence in Cambridgeshire. [4]
Perry Woods SSSI	1.84km north	An ash-maple ancient woodland. Supports diverse floral and invertebrate diversity. [5]
Grafham Water SSSI	2.83km -north	An extensive reservoir that can support nationally important numbers of summer moulting mute swan and wintering great crested grebe, tufted duck and coot. It is also an important site for passage migrants, wintering and breeding birds. A small pond also supports great crested newt. [6]
Little Paxton Pits LNR	3.11km -north-east	An extensive area of flooded gravel workings, with a diverse vegetation structure. The pits are of national importance for wintering wildfowl and an important stopping point for migrants. Notable use by wintering gadwall with over 1% of the British wintering population. The invertebrate fauna is extremely rich and includes a number of national rarities including a number of flies (Diptera) (*Spilogona scutulata, Limnophora scrupulosa, Dolichopus andulusiacus* and *Lispocephala falculata*) and the leaf-hopper (Homoptera) *Idiocerus herrichi*. Other notable species present include common spotted-

3 https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1002239&SiteName=st.%20neot&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

4 https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1000864&SiteName=little%20paxton&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

5 https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1002166&SiteName=perry%20wood&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

6 https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1002330&SiteName=grafham&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

Site Name	Approximate Distance and Direction from Site	Description
		orchid, bee orchid, blue fleabane, hare's-foot clover and knotted clover.[7]
Little Paxton Pits SSSI	3.12km north-east	An extensive area of flooded gravel workings, with a diverse vegetation structure. The pits are of national importance for wintering wildfowl and an important stopping point for migrants. Notable use by wintering gadwall with over 1% of the British wintering population. The invertebrate fauna is extremely rich and includes a number of national rarities including a number of flies (Diptera) (*Spilogona scutulata, Limnophora scrupulosa, Dolichopus andulusiacus* and *Lispocephala falculata*) and the leaf-hopper (Homoptera) *Idiocerus herrichi*. Other notable species present include common spotted-orchid, bee orchid, blue fleabane, hare's-foot clover and knotted clover.[8]
Eversden and Wimpole Woods SAC	17.4km south-east	Annex II species that are a primary reason for selection of this site: 1308 Barbastelle *Barbastella barbastellus* The site comprises a mixture of ancient coppice woodland (Eversden Wood) and high forest woods likely to be of more recent origin (Wimpole Woods). A colony of barbastelle *Barbastella barbastellus* is associated with the trees in Wimpole Woods. These trees are used as a summer maternity roost where the female bats gather to give birth and rear their young. Most of the roost sites are within tree crevices. The bats also use the site as a foraging area. Some of the woodland is also used as a flight path when bats forage outside the site.

Non-Statutory designated Sites for Nature Conservation

7.6.4 Data provided by CPERC and BLBRMC identified 26 non-statutory designated sites for nature conservation within 2km of the Site. A total of 13

7 https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009006&SiteName=Little%20Paxton%20Pits%20&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

8 https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1002350&SiteName=Little%20Paxton%20Pits%20&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

CWS were located within Cambridgeshire, with 12 CWS and one Roadside Nature Reserve (RNR) within Bedfordshire. Of these, Kangaroo Meadow CWS and Huntingdon Wood CWS are located adjacent to the Site. All other non-statutory designated sites for nature conservation are located over 100m from the Site. A summary of non-statutory designated site is given in Table 7.11 and shown on **ES Vol 3 Figure 7-2 [EN010141/DR/6.3]**.

Table 7.11: Non-statutory designated Sites for Nature Conservation

Designated Site Name	Distance and Direction from Site	Description
Huntingdon Wood CWS	Adjacent Site	The site is a woodland listed in the Cambridgeshire Inventory of Ancient Woodland which retains more than 25% semi-natural cover.
Kangaroo Meadow CWS	Adjacent Site	Recognised for the presence of neutral grassland. A small triangular area of unimproved neutral grassland which can be inundated in winter.
High Wood CWS	115m south	The site is a woodland listed in the Cambridgeshire Inventory of Ancient Woodland which retains more than 25% semi-natural cover.
Moor Road Marshy Fields CWS	255m south	The site supports at least 0.5ha of NVC community S7 Lesser Pond-sedge swamp.
The Elms Paddock CWS	315m north-east	The site supports frequent numbers of at least 8 neutral grassland indicator species,
Staploe and Honeydon RNR	355m south-west	Recognised for supporting nationally scarce Spiked Star of Bethlehem or Bath Asparagus (*Ornithogalum pyrenaicum*), Sulphur Clover (*Trifolium ochroleucon*) and Crested Cow-wheat (*Melampyrum cristatum*)
Cemetery North of Churchyard CWS	375m north	The site supports frequent numbers of at least 8 neutral grassland indicators, at least 3 of these are strong indicators.
Willow Pollards West of Sharps Barn CWS	465m east	The site supports at least 5 mature pollard willows in association with other semi-natural habitat.
Meagre Wood CWS	485m north-east	The site is a woodland listed in the Cambridgeshire Inventory of Ancient Woodland which retains more than 25% semi-natural cover.

Designated Site Name	Distance and Direction from Site	Description
Swineshead Wood CWS	900m north-west	Recognised for the presence of ancient semi-natural woodland. The northern and western areas of the woodland comprise mixed plantation with open areas. The remainder of the site, designated also as a SSSI, is previously managed structurally and species diverse ancient semi-natural woodland on wet soils.
Sandye Lane CWS	910m north-west	Recognised for the presence of neutral grassland. A green lane linking Spanoak Wood and Tilbrook Bushes CWS with Swineshead CWS
River Great Ouse CWS (Cambridgeshire)	995m west	Major river not grossly modified by canalisation or poor water quality; supports >0.5ha NVC S6 swamp; >0.5ha S4 swamp; >0.05ha MG13 grassland; a nationally scarce vascular plant (*Nymphoides peltata*); breeding populations of a nationally rare dragonfly (*Libellula fulva*)
Wyboston Pits CWS	1.03km west	The Site comprises a series of flooded disused gravel pits surrounded largely by amenity grassland with scattered trees and shrubs but with smaller areas of neutral and marshy grasslands and broadleaved plantation.
Agdengreen Wood CWS	1.07km north	The site is a woodland listed in the Cambridgeshire Inventory of Ancient Woodland which retains more than 25% semi-natural cover.
Tilbrook Bushes and Sandy Lane CWS	1.13km North-west	The site supports a population of a vascular plant species which is rare in the county and because it supports as least 500m of hedgerow of the requisite dimensions and species diversity that is allowed to flower and fruit.
Hook and Home Woods CWS	1.14km south	Recognised for the presence of ancient semi-natural woodland. The CWS comprises two discrete areas of woodland; Hook Wood semi-natural broadleaved woodland and the northern section of Home Wood, containing semi-natural broadleaved woodland, conifer plantation at the eastern end and a central area of dense scrub.
Midloe Woods CWS	1.20km north-east	The site is a woodland listed in the Cambridgeshire Inventory of Ancient Woodland which retains more than 25% semi-natural cover.

Designated Site Name	Distance and Direction from Site	Description
Spanoak Wood and Tilbrook Bushes CWS	1.25km north-west	Recognised for the presence of ancient semi-natural woodland and marsh. An ancient woodland site, consisting mostly of young mixed planation of spruce and oak with a field layer of tall grasses and herbs. To the east of the site is an area of marshy neutral grassland.
Honeyhill Wood CWS	1.27km north	The site is a woodland listed in the Cambridgeshire Inventory of Ancient Woodland which retains more than 25% semi-natural cover.
Keysoepark Wood CWS	1.47km south	Recognised for the presence of ancient semi-natural woodland. A block of semi-natural broadleaved woodland with a mature canopy underplanted with conifers.
Horse Close CWS	1.56km north-east	The site supports frequent numbers of at least 8 neutral grassland indicator species, at least 3 of these are strong indicators. Additionally it supports a population of a Nationally Scarce vascular plant species.
Melchbourne Woods CWS	1.58km west	Recognised for the presence of ancient semi-natural woodland. A large area of semi-natural broadleaved woodland and plantation, most of which is ancient woodland.
River Great Ouse CWS (Bedfordshire)	1.61km south-east	Designated for river habitats and adjacent habitats and features which are considered part of the river system
Little Barford CWS	1.65km south-east	A complex of two semi-improved pastures to the east, an area of swamp vegetation in a poplar plantation to the west (not surveyed), a churchyard and the neighbouring section of the River Great Ouse.
Bushmead Meadows CWS	1.71km south	Recognised for the presence of neutral grassland. One of the largest and most species rich areas of CWS grassland (in Bedfordshire) north of Bedford.
Begwary Brook Pits CWS	1.87km south-east	Contains a diversity of habitats including marsh, neutral grassland, ponds, lakes, ditches and woodland. The River Great Ouse forms the eastern and northern boundaries of the County Wildlife Site.

Irreplaceable Habitats

7.6.5 Three ancient woodland parcels are located within 500m of the Site, with a further fourteen within 2km of the Site. The closest ancient woodland is Huntingdon Wood, which is located directly adjacent to the Site, between Site D and the Eaton Socon Substation. Ancient woodland locations are shown on **ES Vol 3 Figure 1-3 [EN010141/DR/6.3]**.

7.6.6 The **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]** identified 18 veteran trees and a further five trees with veteran features within the Site.

7.6.7 No evidence of peaty soil habitats, or of any other irreplaceable habitats was identified through the desk study.

Existing Records of Priority Habitats

7.6.8 Priority habitats recorded within the Site through the desk-based review and extended habitat surveys include hedgerows, deciduous woodland and ponds.

7.6.9 Additionally, a review of MAGIC identified the following habitats within 2km of the Site: coastal and floodplain grazing marsh, traditional orchards, lowland fen, lowland meadow, wet woodland and reedbed.

Habitats

7.6.10 Detailed baseline information in relation to habitats is provided in **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**. Habitats are shown on **ES Vol 3 Figure 7-3 [EN010141/DR/6.3]**.

East Park Site A

7.6.11 East Park Site A, west of B660 Kimbolton road and B660 Pertenhall Road, predominantly consists of large arable fields planted with cereal crops at the time of survey. Fields are typically bounded by species-poor hedgerows

dominated by hawthorn and blackthorn, but also variously including field maple, ash, oak, dog rose, sycamore, hazel.

7.6.12 Within the north of Site A lies the Pertenhall Brook, a watercourse of approximately 1.5-2m width and 0.5m depth and with a slow flow. The watercourse has been subject to modifications including the deepening of the channel, which is now lies within steep banks of approximately 2m.

7.6.13 Habitats immediately beyond the Site A boundary include further arable fields, blocks of plantation broadleaved woodland, as well as the existing Manor Farm solar array.

East Park Site B

7.6.14 East Park Site B, east of B660 Pertenhall Road, similarly comprises agricultural habitats consisting of cereal crops and non-cereal (legume) crops. Fields typically have modified grassland margins consisting of common species typical of agricultural landscapes.

7.6.15 Fields are bounded by hedgerows, typically species-poor and dominated by hawthorn and blackthorn but variously also containing oak, ash, willow, elder and sycamore. Ditches are also present, as well as some small streams that are tributaries of the Pertenhall Brook.

7.6.16 A few small areas of broadleaved woodland are located within the Site.

7.6.17 Habitats immediately beyond the Site B boundary include further arable fields, with the village of Little Staughton to the South.

East Park Site C

7.6.18 East Park Site C surrounding New Wood consists predominantly of arable fields bounded by ditches and with modified grassland margins.

7.6.19 New Wood is located centrally in the parcel, which is an oak dominated woodland with evidence of use for gamebird rearing.

7.6.20 The River Kym is present to the north of Site C to the north, a river approximately 5m wide and with banks modified by reprofiling. The river is lined with trees including ash and willow.

7.6.21 Habitats immediately beyond the Site C boundary include further arable fields, with the village of Staughton Highway to the north.

East Park Site D

7.6.22 East Park Site D comprises predominantly arable fields with small blocks of woodland and scrub on the western boundary, as well as recent hedgerow planting. Field boundaries are less well established in this Site.

7.6.23 Habitats immediately beyond the East Park Site D boundary include further arable fields. High wood, a small woodland block, and a solar farm is present to the south of East Park Site D.

Cable Corridor B - C – East Park Site B to Site C

7.6.24 The cable corridor connects East Park Site B and C across an unnamed road and arable fields.

Cable Corridor C - D – East Park Site C to Site D

7.6.25 The cable corridor connects East Park Site C and D across Moor Road and an arable field.

Grid Connection – East Park Site D to Eaton Socon Substation

7.6.26 The grid connection connects East Park Site D to the Eaton Socon Substation and crosses open arable fields, Duloe Brook, Duloe Lane and Bushmead Road, as well as woodland around the Eaton Socon Substation.

7.6.27 Habitats adjacent to the grid connection predominantly consist of arable land but also includes a pond and Huntington Wood (ancient woodland and CWS).

Species

Birds

Desk study

7.6.28 The desk study returned 5,903 recent bird records comprising 129 species within 2km of the Site during the last ten years. This included 23 Schedule 1 species, 14 Annexe 1 species, 27 Section 41 Priority species. 37 Birds of Conservation Concern (BoCC) red list species and 47 BoCC amber list species.

Breeding Birds

7.6.29 Habitats within the Site are suitable to support a range of widespread breeding birds, including ground nesting species within more open arable land and a wide range of species typical of lowland arable landscapes (e.g., passerines, corvids, owls, raptors) within boundary woodlands, hedgerows and trees.

7.6.30 During habitat surveys a barn owl box was noted within East Park Site B offering a potential nest site, but usage of the box is unknown. Additionally a tree with a suitable cavity for owl nesting and signs of whitewash was identified also in East Park Site B.

7.6.31 Further, a log storage building with owl pellets (species unknown) and white wash was identified in East Park Site B and two barns suitable for breeding or roosting owls identified in East Park Site A, but not accessed for detailed inspection.

7.6.32 Breeding bird surveys identified an assemblage typical of lowland agricultural landscapes, with a total of 21 Notable Species (as defined in **ES Vol 2 Appendix 7-2: Breeding Bird Survey Report [EN010141/DR/6.2]**) recorded breeding within the Site.

7.6.33 Breeding evidence for the 21 Notable Species recorded within the Site included:

- Nine Red List species (grey partridge, cuckoo, lapwing, skylark, yellow wagtail, greenfinch, linnet, corn bunting and yellowhammer);
- Eleven Amber List species (quail, stock dove, woodpigeon, moorhen, tawny owl, sedge warbler, whitethroat, wren, song thrush, dunnock and reed bunting);
- Eleven species listed as rare and most threatened species under Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act (2006) (grey partridge, cuckoo, lapwing, skylark, song thrush, dunnock, yellow wagtail, linnet, corn bunting, yellowhammer and reed bunting);
- Two species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) (quail and red kite); and,
- One species listed on Annex 1 of the Directive 2009/147/EC (Birds Directive) (red kite).

7.6.34 Breeding territories of Notable Species were typically associated with vegetation along field boundaries, which principally comprises of field-margins, hedgerows, scrub, tree-lines and woodland habitats within and adjacent to the Site.

7.6.35 Ground-nesting Notable Species that breed in open habitats within the Site comprised of grey partridge (6 territories), quail (1 territory), lapwing (2 territories), skylark (125 territories), yellow wagtail (14 territories) and corn bunting (11 territories).

7.6.36 Breeding territories of notable species are shown in Table 7.12, with ground-nesting species highlighted in bold. Breeding bird territories are shown on **ES Volume 3 Figure 7-4 [EN010141/DR/6.3]** with territories of Schedule 1 species shown on **ES Volume 3 Figure 7-9 [EN010141/DR/6.3]** .

7.6.37 Full details of the breeding bird baseline are provided in **ES Volume 2 Appendix 7-2: Breeding Bird Survey Report [EN010141/DR/6.2]**.

Table 7.12: Notable Breeding Bird Territories Recorded Within the Site.

Species	Total Site Estimated Territories	Comments
Grey partridge	6	Possible breeding throughout on-Site field margins (Maps 2, 3, 5, 7 and 8).
Quail	1	Possible breeding. See ES Volume 3 Figure 7-10 [EN010141/DR/6.3].
Cuckoo	3	Possible breeding. Recorded in field boundary habitats and woodlands (Maps 1, 4, 5 and 8). Note that this species does not 'actively nest' and instead relies on brood parasitism to reproduce.
Stock dove	10	Probable breeding. Recorded throughout on-Site field boundary habitats and woodland.
Woodpigeon	32	Confirmed breeding. Recorded throughout on-Site field boundary habitats and woodland.
Moorhen	1	Confirmed breeding. Juvenile recorded on a pond in Map 7.
Lapwing	2	Confirmed breeding pairs with chicks recorded in open arable habitats in Map 6.
Red kite	1	Confirmed breeding. See ES Volume 3 Figure 7-10 [EN010141/DR/6.3]
Tawny owl	3	Possible breeding. Calling birds identified in woodlands during dusk visits in Map 1 and 5.
Skylark	125	Confirmed breeding with chicks identified. Recorded singing throughout on-Site open field habitats.
Sedge warbler	1	Possible breeding. Identified singing along a field boundary ditch in Map 7.
Whitethroat	62	Confirmed breeding with chicks identified. Recorded singing and calling throughout field boundary habitats.
Wren	65	Probable breeding. Recorded singing and calling throughout field boundary habitats.

Song thrush	26	Confirmed breeding with chicks identified. Recorded throughout on-Site field boundary habitats and woodland.
Dunnock	31	Confirmed breeding with chicks identified Recorded singing and calling throughout on-Site field boundary habitats.
Yellow wagtail	14	Probable breeding. Recorded singing and calling in open arable fields (Maps 1 to 3, 5, 6 and 8).
Greenfinch	6	Probable breeding with displaying recorded. Identified singing and calling in trees (Maps 1 to 5).
Linnet	44	Confirmed breeding with chicks identified. Recorded throughout on-Site field boundary habitats.
Corn bunting	11	Probable breeding with adult seen visiting a potential nest. Singing behaviour recorded along field margins (Maps 1 to 5 and 7).
Yellowhammer	66	Confirmed breeding with chicks identified. Recorded singing and calling throughout field boundary habitats
Reed bunting	30	Confirmed breeding with food carrying identified. Mostly recorded singing and calling along field boundaries adjacent to ditches and watercourses.

Non-Breeding Birds

7.6.38 Habitats within the Site are suitable to support a range of non-breeding bird species, however those recorded on the ground within the Site were predominantly in low numbers and sporadically present in both 2021-22 and 2023-24 surveys.

7.6.39 Within the Site, target species observed included red kite, lapwing, golden plover, mallard, moorhen, black-headed gull, common gull, herring gull, lesser black-backed gull, woodcock, kingfisher and red kite. Secondary species identified within the Site included buzzard, sparrowhawk, skylark, stock dove, tawny owl, yellowhammer, woodpigeon, fieldfare, redwing, starling, corn

bunting, yellowhammer and linnet. All are species typical of lowland agricultural habitats in the region.

7.6.40 Typically, only small numbers were recorded regularly within the Site and wider survey area (as defined in **ES Volume 2 Appendix 7-3: Wintering Bird Survey Report [EN010141/DR/6.2]**), however there were occasional larger flocks. Usage was considered to be typical of the habitats and region, and unremarkable.

7.6.41 Full details of the non-breeding bird baseline are provided in **ES Volume 2 Appendix 7-3: Wintering Bird Survey Report [EN010141/DR/6.2]**.

Bats

Desk Study

7.6.42 The desk study returned 18 recent records of bat comprising 12 species, all of which are located outside of the Site. One NE protected species licence for the destruction of a common pipistrelle and brown long-eared bat roost site bats was located outside of the Site, but within the desk study area.

Roosting

7.6.43 During the extended habitat survey eight trees were identified as possessing potential roost features (PRF) of up to PRF-M[22], including woodpecker holes, rot holes and limb cracks. Several trees within the Site and immediately adjacent land possessed features offering PRF-I[22].

7.6.44 In addition, a log storage building in East Park Site B was assessed as offering moderate bat roost potential and two barns adjacent to East Park Site A were assessed as offering high bat roost potential.

7.6.45 Details of trees and structures identified are provided in **ES Volume 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**.

Foraging and Commuting

7.6.46 Habitats within the Site as a whole are considered to fit the description most closely for land of 'moderate' interest for foraging bats in accordance with Bat Conservation Trust (BCT) guidance[22], with continuous habitat connected to the wider landscape that could be used for commuting and foraging. However, the arable habitats, which the Site is dominated by, offer poor quality habitat for foraging and commuting bats.

7.6.47 Linear features within and around the Site such as tree lines, hedgerows, field margins, ditches, woodland edges and watercourses are considered to offer the most favourable habitats for foraging/commuting bats, particularly the Pertenhall Brook and the River Kym.

7.6.48 Nighttime Bat Walkover (NBW) surveys, also referred to as walked transect surveys, recorded a minimum of six species on Site: common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, noctule, brown long-eared, barbastelle and Myotis spp bats. Only common and soprano pipistrelle were consistently recorded across all transects during each survey visit.

7.6.49 Common pipistrelle was the most frequently recorded species on NBW surveys, while the two transects with the highest activity levels were Transect route 6 and 7. Seasonal activity per species showed variation, but was generally higher for most species during summer NBWs.

7.6.50 Observed bat activity during NBW surveys was most frequently distributed in association with wooded linear features and woodland edge habitats.

7.6.51 Comparable results were found during static detector surveying, with the above species of bat also recorded. Similarly, common pipistrelle was the most frequently recorded species, followed by soprano pipistrelle which together accounted for over 93% of passes. The remaining species/ species groups were all recorded relatively infrequently.

7.6.52 Bat activity was observed highest at MS7, accounting for 22% of observed activity. MS2, MS3, MS4, MS5 and MS6 each accounted for between 10 to 15% of activity, with MS1 and MS8 accounting for less than 10% of activity.

7.6.53 Overall activity levels peaked in July, and were also high in May, each accounting for approximately 30% of passes. The lowest activity was observed in April and October, each accounting for 3 to 4% of passes.

7.6.54 Full details of the bat foraging and commuting baseline are provided in **ES Volume 2 Appendix 7-7: Bat Activity Survey Report [EN010141/DR/6.2]**.

Amphibians

7.6.55 The data search returned 27 records of amphibians, comprised of seventeen great crested newt, six common toad, two common frog and two smooth newt. A review of MAGIC identified no granted Natural England licences for great crested newt within 2km of the Site.

7.6.56 Further review of MAGIC identified five great crested newt Class Survey Licence Returns in three locations (north of Great Staughton, south of Little Staughton Airfield and at Keysoe Row), all of which had confirmed presence of great crested newt in 2015.

7.6.57 A total of three ponds are located within the Site with a further 24 ponds located within 250m of the Site. Of these, two ponds within the Site and eight within 250m were accessed for great crested newt eDNA survey in 2022 and three ponds within the Site and ten ponds within 250m were accessed in 2025.

7.6.58 Within the Site, great crested newt is shown to be present within P14 and P25, but absent at P31. Great crested newt are also present in P8, P13, P17 and P29 located within 250m of the Site, but absent from P9, P38, P39, P42 and P43. Beyond 250m great crested newt are present a P19 but absent at P30 and 30a.

7.6.59 In 2022 P6 and P25 were dry and so not suitable for taking eDNA samples, while in 2025 P6, P41 and P45 were found to be dry. All other ponds could not be accessed.

7.6.60 Desk study records identified historical presence at another pond within 250m of the boundary (P44). Great crested Newt Survey Results are shown on **ES Vol 3 Figure 7-7 [EN010141/DR/6.3]** and provided in **ES Vol 2 Appendix 7-5 [EN010141/DR/6.2]**.

7.6.61 In addition, it is likely that ponds support other common species of amphibian, including common toad.

7.6.62 Terrestrial habitats within the Site are predominantly sub-optimal for amphibians, comprising predominantly arable land, however discrete aeras of the Site, including field margins and hedgerow bases offer more suitable habitat.

Reptiles

7.6.63 The data search returned three records of grass snake within 2km of the Site during the last ten years. No records were returned within the Site itself, with the closest recording located in Little Staughton; c.245m east of East Park Site B.

7.6.64 Habitats within the site are predominantly sub-optimal for reptiles, comprising predominantly arable land, however discrete areas of the Site, including field margins and hedgerow bases, offer more suitable habitat.

Badgers

7.6.65 Baseline information relating to badgers is provided within the confidential badger survey report in **ES Vol 2 Appendix 7-4: Badger Survey Report [EN010141/DR/6.2]**.

Otters

7.6.66 The data search returned 21 recent records of otter, the closest of which was located immediately north of Site C on the River Kym. Records including

sightings, spraints and prints are located along the length of the River Kym. Recent camera trap records were also provided within the data search located on the Riseley Brook, which connects directly to the Pertenhall Brook. Records primarily centre on the River Great Ouse.

7.6.67 Watercourses, including the Pertenhall Brook, River Kym, South Brook and Duloe Brook, as well as their smaller tributaries, offer suitable habitat to support foraging and commuting otters. Taken together with desk study records and considering the extensive home range and recent population increases of otters, it is considered likely that otters are utilising watercourses located within and adjacent to the Site, including the River Kym, Pertenhall Brook and Duloe Brook, and may occasionally utilise smaller tributaries of these watercourses.

7.6.68 Targeted surveys of crossing points found habitat suitable to support otter at C01, C05a, C05b, C58a and C58b. Additionally, C35, C37, C53 and C54 may support occasional use by otter for commuting, but water levels were found insufficient to support regular foraging. Crossing point locations are shown on **ES Vol 3 Figure 2-3: Indicative Crossing Plans [EN010141/DR/6.3]**, and described in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

Water Vole

7.6.69 The data search returned nine recent records of water vole, with the closest located 1.1km north-west of Site C along the River Kym.

7.6.70 While few ditches within the Site were considered to offer optimal habitat for water vole, watercourse and ditches present within and immediately adjacent to the Site do offer suitable habitat for the species.

7.6.71 Targeted surveys for water vole were undertaken at proposed crossing points and identified six locations offering suitable habitat for water vole, these being C01, C05a, C05b, C35, C53, C54, C58a, and C58b. Additionally C37 was potentially suitable, although very low water levels made this location sub-optimal.

7.6.72 Detailed searches for water vole field signs found no latrines, which is the only evidence that can reliably confirm water vole presence, small mammal burrows and feeding remains typical of water vole were identified at C54, while a burrow of sufficient size to support water vole (but with no other evidence) was identified at C58a/b. While no definitive evidence of water vole was identified, presence of the species cannot be precluded at C54 and C58a/b.

7.6.73 Crossing point locations are shown on **ES Vol 3 Figure 2-3: Indicative Crossing Plans [EN010141/DR/6.3]**, and described in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

Hazel Dormouse

7.6.74 The data search returned no recent records of hazel dormouse within 2km of the Site.

7.6.75 Arable habitats within the Site offer negligible suitable habitat for the species, however hedgerows offer habitat of greater suitability, particularly where connected to larger woodland blocks.

7.6.76 Areas of ancient woodland located outside of the Site likely offer suitable habitat to support this species, however such woodlands are small in size and sparsely located within the landscape reducing the likelihood of hazel dormouse presence.

7.6.77 Given the absence of recent records of the species, and largely suboptimal habitats within the Site and wider landscape, hazel dormouse are considered likely to be absent from the Site.

White-clawed Crayfish

7.6.78 The combined data search returned no records of white-clawed crayfish within 2km of the Site during the previous ten years.

7.6.79 During the extended habitat survey, several watercourses within and adjacent to the Site were considered suitable to support this species. Watercourses

considered to be suitable include the River Kym, Pertenhall Brook and an unnamed stream located within East Park Site B.

7.6.80 Field ditch habitats which comprise the majority of on-Site watercourses were found to offer negligible suitable habtiat at surveyed crossing point locations, being found to dry frequently and/ or lacking the cobble bed material that is preferred by this species.

7.6.81 Given the absence of any recent records of the species and the rarity of white clawed crayfish it is considered reasonably unlikely that the species is present within the Site and immediately adjacent areas.

Other Notable Species

Notable Flora

7.6.82 Of the plant species returned in the combined data search, the only species listed under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) with records returned was bluebell; thirteen records were returned in the data search, with one from within the Site itself. This included bluebells in a parcel of woodland situated in the centre of East Park Site A.

7.6.83 Bluebells were identified directly adjacent to the Site during the extended habitat surveys with the species recorded in woodlands neighbouring East Park Sites B and C.

7.6.84 Habitats within the Site are typical of lowland agricultural landscapes and are common and widespread both locally and nationally, and it is therefore considered likely that the Site supports a similarly common and widespread flora, although it is acknowledged this may include some notable species.

7.6.85 While targeted survey has not been undertaken, no evidence of notable arable flora (typically those requiring annual ground disturbance) was observed and it is considered that arable fields, which dominate the Site, are unlikely to support notable flora.

Fish

7.6.86 The data search returned no recent records of notable fish species.

7.6.87 Watercourses located within and immediately adjacent to the Site may support notable fish species. Field ditches are considered to offer sub-optimal habtiat for eels due to frequent drying.

Notable Invertebrates

7.6.88 The desk study returned 606 records of 37 invertebrate species listed as priority species under S41 of the NERC act. Desk study records also included 30 records of Norfolk hawker, one record of purple emperor and four records of white-letter hairstreak, all of which are listed under Schedule 5 of the Wildlife and Countryside Act.

7.6.89 Two records of white-letter hairstreak were located immediately south of Site B along an elm rich hedgerow which continues northwards, forming the Site boundary. Additionally four records of the priority species small heath butterfly were located within Site A and Site B.

7.6.90 Habitats within the Site are typical of lowland agricultural landscapes and are common and widespread both locally and nationally, and it is therefore considered likely that the Site supports a similarly common and widespread invertebrate assemblage, although it is acknowledged this may include some notable species.

Other Notable Mammals

7.6.91 The data search returned records of other notable mammal species including hedgehog and brown hare within 2km of the Site during the last ten years. Of these, none were identified within the Site itself.

7.6.92 The hedgerows, woodland, tree lines and grassland field margins within the Site provide the greatest opportunities for breeding, foraging and sheltering brown hare and hedgehog.

7.6.93 Brown hares were frequently noted within the Site incidentally during surveys.

Future Baseline

7.6.94 In the absence of the Scheme, it is likely that the Site would continue in similar agricultural use and retain much the same baseline habitat characteristics as are observed during baseline ecological surveys.

7.6.95 A degree of natural variation in the distribution and size of species populations is likely to occur as a result of natural process and is to be expected regardless of the Scheme; however, the baseline conditions outlined above are considered to represent a realistic ecological baseline for the foreseeable future.

7.6.96 It is possible that anthropogenic climate change may result in the recording of species previously unrecorded as species from continental Europe migrate northwards. Further, the spread of invasive non-native species (e.g., Asian hornet) could result in changes to native species distributions on site. Such variations over time would occur independently of the Scheme.

7.6.97 No substantive changes to the management of the Site, or the distribution of ecological features are anticipated prior to construction, and the ecological baseline as assessed is considered to suitably represent the conditions present at the point of construction of the Scheme.

7.7 Embedded Mitigation and Enhancement Measures

Design Principles

7.7.1 The **Design Approach Document (DAD) [EN010141/DR/5.6]** explains how the design of the Scheme has evolved from project inception through to submission of this application for development consent. The DAD sets out the project vision and design principles, the way the design has evolved, and how good design will be secured post-consent.

7.7.2 The design process has been led by competent design experts in consultation with the local community, local project stakeholders and statutory consultees to deliver on a design vision. Design decisions have been made in line with a series of project design principles that were prepared based on guidance set out by the Planning Inspectorate and the National Infrastructure Commission.

7.7.3 These design principles have evolved since the inception of the Scheme as an understanding of the project has also evolved, and in response to the EIA process. The design principles are as follows:

- **Design Principle 1**: The Scheme will seek opportunities to deliver solar development as efficiently as practicable to support national electricity network decarbonisation targets;
- **Design Principle 2**: The Scheme will be sensitive to landscape and views, and how people perceive the landscape;
- **Design Principle 3**: The Scheme will be sensitive to heritage assets, looking to protect the most valuable assets that contribute to a sense of place;
- **Design Principle 4**: The Scheme will be sensitive to biodiversity, and look to provide enhancement where possible;
- **Design Principle 5**: The Scheme will be sensitive to the water environment, looking to avoid harm to watercourses and improve water quality where practicable;
- **Design Principle 6**: The Scheme will be sensitive to local amenity and human health; and

- **Design Principle 7**: The Scheme will seek opportunities to leave a positive legacy through the delivery of multiple social and environmental benefits.

7.7.4 Of most relevance to the mitigation of impacts on ecological receptors is Design Principle 4, which has the following sub-principles:

- **Principle 4.1:** Deliver a biodiversity net gain through a responsible approach to environmental management; and
- **Principle 4.2:** Improve habitat connectivity through a holistic approach to landscape and ecological design.

7.7.5 Section 5.6 of the **DAD [EN010141/DR/5.6]** sets out how the design of the Scheme has responded to each of the above principles. These design principles and the illustrative masterplan for the Scheme are embedded design measures. The design principles are secured by the **Design Parameters and Principles Statement [EN010141/DR/7.1]** which will be certified as part of the DCO and detailed design submissions will be required to accord with it.

Illustrative Environmental Masterplan

7.7.6 The Illustrative Environmental Masterplan accompanying this ES is provided on **ES Vol 3 Figure 2-1 [EN010141/DR/6.3]** and illustrates the likely proposed mitigation of the Scheme.

7.7.7 The Illustrative Environmental Masterplan on **ES Volume 3 Figure 2-1 [EN010141/DR/6.3]** is annotated to set out the purpose of the landscape proposals to meet the design objectives and mitigate for the impacts of the Scheme, these include:

- Retention of existing woodland, hedgerows, individual trees, ditches and watercourses across the Site as far as practicable;
- Creation of ‘Green Lanes’ through the Site where public rights of way are retained within open 20m wide corridors bounded by hedgerows and

woodland blocks for visual screening, landscape integration and habitat connectivity purposes;

- Enhancement of waterside meadows along the Pertenhall Brook and an unnamed watercourse through Site B by creating riparian woodland blocks, meadows, hedgerows and intermittent riparian tree groups for ecosystem benefits, habitat connectivity, and to reduce visual impact on public rights of way alongside watercourses;
- Proposed hedgerows with trees for landscape integration, visual screening and habitat connectivity. In parts of the Site these have been provided to restore historic field boundaries;
- Creation of species-diverse grassland meadows and corridors as buffers to existing landscape elements (such as hedgerows and woodland), as buffers to residential properties, and for ecological mitigation and benefits; and
- Inclusion of mammal gates within all fence lines to solar areas.

7.7.8 The landscape proposals from the Illustrative Environmental Masterplan are repeated on the Illustrative Landscape Proposals drawing at **Appendix A** of the **outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]**. The oLEMP is a control document that will be certified as part of the Development Consent Order (DCO) and implemented via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**. Should the Scheme be consented, the DCO will require that a final Landscape and Ecological Management Plan (LEMP) in substantial accordance with this oLEMP is prepared and approved by the LPA prior to commencing the relevant construction phase. The final landscape proposals must therefore be in substantial accordance with those shown on the Illustrative Landscape Proposals at **Appendix A** of the **oLEMP [EN010141/DR/7.7]**.

Construction Phase

General

7.7.9 Embedded mitigation measures for the construction phase are secured by the adoption of the **oLEMP [EN010141/DR/7.7]** and an **oCEMP [EN010141/DR/7.3]**.

7.7.10 The oCEMP is a control document that will be certified as part of the DCO and implemented via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**. Should the Scheme be consented, the DCO will require that a final Construction Environmental Management Plan (CEMP) in substantial accordance with this oCEMP is prepared prior to commencing the construction phase. The oCEMP sets out the following broad measures of relevance to this assessment:

- Requirement for an ecological clerk of works (EcoCoW);
- Site protection measures (fencing/soil management plan);
- Pollution control, including runoff and dust;
- Noise and vibration management measures;
- Implementation of habitat protection buffers;
- Implementation of root protection areas in line with BS:3857;
- Sensitive lighting strategy;
- Pre-construction surveys;
- Protected species derogation licenses (if required);
- Reasonable Avoidance Measures (RAMs); and
- Requirement for Invasive Non-Native Species Management Plans.

Ecological Clerk of Works

7.7.11 A suitably qualified and experienced EcoCoW would be appointed prior to the commencement of construction activities and through whom appropriate ecological advice will be provided throughout. The EcoCoW will be responsible for undertaking and/or co-ordinating checks for protected species before providing confirmation that construction activities can commence. The

EcoCoW will also maintain a watching brief as necessary throughout the construction phase to ensure compliance with relevant legislation, including adhering to any protected species mitigation measures, if required.

Protection of Habitats

7.7.12 Heras fencing, or similar, would be used to demarcate the working area in order to protect sensitive ecological or hydrological features during the site preparation works and construction phase of the project. The works will adhere to 'British Standards BS5837:2012 Trees in relation to design, demolition and construction' as set out in **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]**.

7.7.13 Best practice measures to control both runoff and dust pollution would be implemented during construction across the Site, but particularly in proximity to sensitive habitats, together with noise and vibration management measures.

Sensitive Lighting Strategy

7.7.14 Construction works would take place 08.00 to 18.00 hrs Monday to Friday and 08:00 to 13:00 hrs Saturday. The compounds would be lit during periods of low light during construction working hours. Outside working hours, lighting would only be switched on for security breaches or temporary mobile task lighting.

7.7.15 A sensitive lighting strategy would be put in place to manage temporary lighting used during the construction phase. Any lighting that is required would be directed away from existing or created linear habitats and woodland. This would be achieved by the use of low-level lighting and lighting hoods to prevent the spillage of light from its intended source. Any lighting would be directed away from the ditches, watercourses and ponds, and associated terrestrial habitats.

7.7.16 The sensitive lighting strategy would be informed by current guidance 'Guidance Note 08/23: Bats and artificial lighting at night' (2023)[23].

Breeding Birds

7.7.17 A possible effect of construction is the direct impacts to nesting birds through disturbance to species associated with field boundary habitats and direct impacts to ground nesting species, if works are undertaken in the breeding season (March to August inclusive). As the Scheme would be implemented in phases (with reference to **ES Vol 2 Appendix 2-1: Indicative Construction Phasing and Resource Schedule [EN010141/DR/6.2]**, not all of the Site would be subject to disturbance at the same time through the phased construction program which enables large areas to be retained whilst construction occurs in others to avoid cumulative disturbance.

7.7.18 In order to avoid impacts on nesting birds and to ensure compliance with the provisions of the Wildlife and Countryside Act 1981 (as amended), vegetation removal would take place outside of the bird breeding season wherever possible. If vegetation works (including any crop or hedgerow removal required to facilitate development) are necessary during the breeding season, any suitable nesting habitat to be affected by works would be checked by a suitably experienced ecologist prior to works commencing via the EcoCoW. Nesting bird checks may need to be repeated during different phases of work or at different times during the nesting bird season, depending on the timing of construction activities.

7.7.19 Works would be permitted to proceed only when the EcoCoW is satisfied that no disturbance-related offences will occur under the legislation, with appropriate protection measures set in place as necessary and supervised by the EcoCoW.

Bats – Roosting

7.7.20 Trees present within the Site would be retained and protected during construction. If plans change and trees require removal/felling as part of the Scheme (for instance to aid access requirements or for health and safety purposes), prior to removal, in accordance with current BCT guidance, any trees would be subject to a ground level tree assessment (GLTA) in order to

assess the tree's potential to support roosting bat species. Trees with Potential Roost Feature-Multiple (PRF-M) would be subject to a detailed aerial inspection and/or emergence/re-entry surveys in the appropriate season. If bats are confirmed roosting within the tree(s), no removal would take place until a European Protected Species Mitigation Licence has been issued by Natural England and necessary mitigation measures set in place under the supervision of a licensed ecologist.

7.7.21 If works on trees with Potential Roost Feature-Individual (PRF-I) are necessary, these would be felled under RAMS and Precautionary Working Method Statement, in line with BCT Guidance (2023) and UK Bat Mitigation Guidelines (2023); the trees would be soft felled in sections which are lowered to the ground and left on Site overnight (not stacked) before removal. Should a bat (or nesting bird) be found during this process then works would cease immediately and the EcoCoW contacted immediately for advice.

7.7.22 Works would generally take place 08.00 to 18.00 hrs Monday to Friday and 08:00 to 13:00 hrs Saturday; therefore, other than during winter when day length is short, works are not expected to occur in the hours of darkness. The sensitive lighting strategy, as detailed above, would be informed by current guidance 'Guidance Note 08/23: Bats and artificial lighting at night' (2023). As such, lighting would be managed so that light spillage into key habitat features, such as tree lines, hedgerows, woodland, ponds and ditches does not occur.

7.7.23 This would ensure there are no adverse impacts on roosting bats and the favourable conservation status of the roosting bat species in the wider environment would be retained.

Otter and Water Vole

7.7.24 The Scheme has been designed to avoid impacting linear ditch habitats with potential suitability to support these species as far as reasonably practicable.

7.7.25 Where construction works are required within 10 m of a ditch, watercourse or pond, e.g. creation of new or improved crossing points, these would be

preceded by a pre-construction water vole/otter survey of both aquatic and terrestrial habitats, which would be completed by a suitably qualified ecologist immediately prior to the commencement of construction works to determine the presence of water vole burrows/otter resting places within proximity to the working area.

7.7.26 Should signs of water vole presence, or an active otter holt/resting place be confirmed, works in or adjacent to the feature would only proceed under suitable mitigation measures as advised by the EcoCoW and, if necessary, under a Mitigation Licence issued by NE.

7.7.27 RAMs will be implemented during the construction phase to safeguard any otters within terrestrial habitat during works. The RAMS will include measures to ensure that no trenches/excavations will be left open overnight without the creation of sloping escape ramps for otter, which may be achieved by edge profiling of trenches/excavations or by using planks placed into them at the end of each working day. Ramps will be no greater than 45 degrees in angle. Alternatively, all open trenches/excavations will be covered overnight.

7.7.28 Works will take place 08.00 to 18.00 hrs Monday to Friday and 08:00 to 13:00 hrs Saturday; therefore, other than during winter when day length is short, works are not expected to occur in the hours of darkness. A sensitive lighting strategy would be implemented, as detailed above. Any lighting (construction or operational) would be directed away from the ditches, watercourses and ponds, and associated terrestrial habitats.

Badger

7.7.29 The Scheme layout has been designed to avoid impacting habitats most likely to be used by badgers for both sett building and foraging and commuting (field boundary features). These habitats will be largely retained and protected during the construction process.

7.7.30 A 20 m buffer (30m for large, tracked machinery) would be maintained from active badger setts set out with Heras fencing or similar, with no works to be undertaken within this area unless covered under a specific method statement

and agreed by the ECoW. Where avoidance measures cannot reasonably be implemented and setts are likely to be impacted, these would be closed under a Natural England licence during the appropriate season (July to November inclusive).

7.7.31 A pre-construction badger survey (including land within 30 m of the Site, where access allows) would be completed by a suitably qualified ecologist immediately prior to the commencement of construction/site clearance works to determine levels of badger activity and to check for any newly constructed setts in and surrounding the Site.

7.7.32 If baseline conditions have altered and significant disturbance to badgers or their setts cannot be avoided, one or both of the following options would be incorporated:

- The Scheme design will be further amended to avoid works which may impacts on the sett; and/or
- A disturbance/mitigation licence will be obtained from NE before construction commences.

Amphibians

7.7.33 As a precaution, RAMs would be implemented to avoid significant impacts on amphibian populations, if present. The RAMs would include a ‘toolbox talk’, a two-stage cut of suitable vegetation, and watching brief by an appropriately qualified EcoCoW to minimise risk of accidental harm.

Reptiles

7.7.34 As a precaution, RAMs would be implemented to avoid significant impacts on reptile populations, if present. The RAMs would include a ‘toolbox talk’, a two-stage cut of suitable vegetation, and watching brief by an appropriately qualified EcoCoW to minimise risk of accidental harm.

Other Mammals

7.7.35 RAMs would be implemented to avoid significant impacts on other notable mammal populations, if present. The RAMs would include a 'toolbox talk' and watching brief by an appropriately qualified ECoW to minimise risk of accidental harm.

Fish

7.7.36 Where a 'dry crossing technique' is required for the construction of a new or improved crossing point, the section of water between the dams would be inspected for fish and other aquatic life such as eels. Where considered appropriate, a fish rescue plan would be executed. A fish rescue plan would include details of the relevant permissions required from the Environment Agency, dewatering methods to include the use of fish-safe meshes (default screen aperture size would be 2mm) to be installed over any pumps, monitoring of water pH and the siltation and fish rescue by a suitable experienced ecologist. Dependent on the nature of the ditch and health and safety concerns, different methods may be employed to remove the fish, or a combination of methods, including static netting, hand netting and/or electrofishing. Where netting is used, fine mesh seine netting would be used. The dammed areas/ponds would also be visually inspection to check for the presence of small fish (such as juvenile eel, lamprey, fish fry). Upon capture, fish would be held in suitable sized and leaching-safe capture containers (which will be aerated to maintain welfare considerations) and released downstream of the dam as soon as possible, with the exception of non-native invasive species, which would be humanely dispatched. If the presence of burrowing eels in the banks of the ditches are suspected, the section of bank would be carefully excavated in small sections with soil then placed nearby to water with a means of escape and inspected for the presence of eels.

7.7.37 Standard measures to ensure runoff control and pollution prevention to be implemented via the **oCEMP [EN010141/DR/7.3]** and the **outline Surface Water Management Plan [EN010141/DR/7.13]** would also avoid significant impacts on fish populations, if present. The use of Silt Busters/sedimats/straw

bales will also be used to protect downstream watercourses from silt inputs during prolonged dewatering.

Invasive Non-Native Species

7.7.38 Prior to the commencement of construction, a botanical invasive species walkover survey will be undertaken during an appropriate time of year (May – October) in order to assess the spread of invasive species within the Site.

7.7.39 Should invasive non-native plant species be identified, an appropriate invasive botanical species treatment program would be implemented by a licensed and experienced invasive species contractor; a detailed control and removal strategy method statement would be produced to inform these actions and prevent further spread within the Site during the construction process, detailing the commitment to control or undertake long-term removal (or on-going treatment) of the species' from within the Site.

7.7.40 The appointed EcoCoW will include information regarding invasive non-native species within the toolbox talk, including providing informing contractors on avoidance / good practice measures required to avoid facilitating the spread of these species. Should further areas of spread/ other invasive species be encountered on Site prior to or during construction, the advice of the appointed EcoCoW will be sought, and appropriate measures taken in order to achieve legislative compliance.

Fencing

7.7.41 **As set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**, suitably sized (approximately 20 cm x 25 cm) gaps or mammal gates would be installed at suitable intervals and locations along the perimeter fence line to allow small mammals, including badgers, free movement across the Scheme, providing enhanced opportunities for foraging and refuge within what would be a relatively protected and undisturbed area during operation of the Scheme. The locations of the gaps/gates would be determined during the pre-commencement survey; this approach would allow for any changes in populations, sett locations and mammal paths which may change prior to the

commencement of construction to be taken into account. Temporary Heras fencing, or similar, installed within the Site during construction would also have gaps at suitable intervals and locations to allow free movement.

Operational Phase

7.7.42 The Applicant has prepared an **outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5]** as part of the application for development consent. The oOEMP is a control document that will be certified as part of the DCO and implemented via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**. Should the Scheme be consented, the DCO will require that a final Operational Environmental Management Plan (OEMP) in substantial accordance with this oOEMP is prepared prior to commencing the operational phase.

7.7.43 The **oOEMP [EN010141/DR/7.5]** outlines the principles, controls, and measures to be implemented during the operational phase to reduce potential significant environmental effects from occurring, including pollution control measures and a sensitive lighting strategy. The oOEMP also includes specific measures that will need to be adopted during the replacement and maintenance of any equipment, plant or machinery during the lifetime of the Scheme.

7.7.44 The management and maintenance of the Scheme's proposed landscaping and green infrastructure is secured by the requirements of the **oLEMP [EN010141/DR/7.7]**. The oLEMP sets out the management prescriptions and target habitat conditions for the various landscape features identified on the Illustrative Landscape Proposals (Appendix A of the oLEMP) to ensure measurable gains in biodiversity units are achieved.

7.7.45 Additional post-construction species-specific monitoring may be required as stipulated, as a legal requirement within a European Protected Species Mitigation Licence (or other species-specific mitigation licence) (see the construction phase mitigation above). Any such monitoring would be in

addition to the ecological monitoring discussed above, to ensure compliance with the licence conditions.

Decommissioning Phase

7.7.46 The Applicant has prepared an **outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6]** as part of the application for development consent. The oDEMP is a control document that will be certified as part of the DCO and implemented via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**. Should the Scheme be consented, the DCO will require that a final Decommissioning Environmental Management Plan (DEMP) in substantial accordance with this oDEMP is prepared prior to commencing the decommissioning phase.

7.7.47 The **oDEMP [EN010141/DR/7.6]** sets the framework for the management of environmental impacts during the decommissioning phase of the Scheme. The oDEMP sets out monitoring and auditing activities which would be used to ensure mitigation measures are carried out, recorded and effective.

7.7.48 On decommissioning the landscaping works undertaken across the Site would be left in place and the land handed back to landowners, the only exception being the potential requirement by landowners to revert the areas currently used for arable farming to be returned to this condition. As the land would be handed back to the landowners on completion of decommissioning, the long-term retention of the landscaping improvement works cannot be guaranteed.

7.7.49 Updated ecological surveys would be undertaken prior to the commencement of the Scheme's decommissioning to record the presence of protected and notable species and habitats and identify potential effects of any necessary protection and mitigation measures to comply with planning policy and wildlife legislation applicable at the time.

7.7.50 A suitably qualified and experienced EcoCoW would be appointed prior to the commencement of decommissioning activities and through whom appropriate ecological advice will be provided throughout. The EcoCoW would be

responsible for undertaking and/or co-ordinating checks for protected species before providing confirmation that decommissioning activities can commence. The EcoCoW would also maintain a watching brief as necessary throughout the decommissioning phase to ensure compliance with relevant legislation, including adhering to any protected species mitigation measures required.

Enhancement

Biodiversity Net Gain

7.7.51 A **Biodiversity Net Gain Report [EN010141/DR/7.17]** has been prepared for the Scheme. This considers land take, habitat creation and any biodiversity enhancements that will accompany the Scheme, assessed using the Defra statutory biodiversity metric.

Species Enhancement Measures

7.7.52 In addition to the embedded habitat creation and enhancement measures provided through **the** Illustrative Landscape Proposals at Appendix A of the **oLEMP [EN010141/DR/7.7]**, the following measures will be included as part of the Scheme to provide ecological enhancement, as set out in and secured via the **oLEMP [EN010141/DR/7.7]**:

- 40 no. general purpose bird boxes;
- 6 no. barn owl boxes;
- 3 no. raptor boxes;
- 60 no. bat boxes, including minimum;
    a. 5 no. hibernation boxes;
    b. 5 no. colony boxes;
- 10 no. reptile/ amphibian refugia; and
- 10 no. hedgehog boxes.

7.8 Assessment of Likely Impacts and Effects

Determining Features to be Scoped-In for Detailed Assessment

7.8.1 In accordance with the CIEEM guidance (2018), the assessment only assesses in detail, impacts upon important ecological features i.e., those that are considered important and potentially affected (as set out in Section 7.4 Methodology). It is not considered necessary to carry out detailed assessment of features that are sufficiently widespread, unthreatened, and resilient to project impacts and will remain viable and sustainable, unless there is potential for a significant beneficial or adverse effect as a consequence of the Scheme.

7.8.2 Where ecological features are not considered important enough to warrant further consideration, or where they will not be significantly affected, these can be scoped out of the assessment process, and justification for exclusion is provided. Where a feature has been scoped out of the detailed assessment, due to a lack of significant effects, measures to protect, enhance or ensure legislative compliance are included in Section 7.6 embedded mitigation.

7.8.3 Table 7.13 presents the evaluation of identified ecological features and provides the rationale as to why individual features have been included or 'scoped out' of the detailed assessment, with reference to comments received during consultation and engagement presented in Section 7.3 of this chapter.

Table 7.13: Scoping of Ecological Features

Receptor	Geographic Scale of Importance	Potential Effect Pathway and Rationale for Selection of Features for Detailed Assessment
Statutory Designated Sites for Nature Conservation	Up to international	Mobile qualifying features of designated sites within the ZoI could be affected by habitat changes. Eversden and Wimpole Woods SAC **scoped in** to detailed assessment. Mobile features associated with Grafham Water SSSI are waterbirds associated with open water, which are not present within the Site and as such this site has been s**coped out** of detailed assessment. With the implementation of measures within the embedded **oCEMP [EN010141/DR/7.3],** all other sites are considered sufficiently distanced for no impacts to occur and as such are **scoped out** of detailed assessment.
Non-Statutory Designated Sites for Nature Conservation	Up to county	Non-statutory designated sites are located immediately adjacent to the Site boundary and will be protected in line with embedded avoidance and mitigation measures. No impacts are anticipated during operation, with use of the site comparable to or lesser than existing agricultural use. Due to proximity to the Site, Kangaroo Meadows CWS and Huntingdon Wood CWS are **scoped in** to detailed assessment for construction only. With the implementation of measures within the embedded **oCEMP [EN010141/DR/7.3]**, all other sites are considered sufficiently distanced for no impacts to occur and as such are **scoped out** of detailed assessment
Priority and Irreplaceable Habitats	Up to county	Priority habitats are located within the Site. The extent and distribution of priority habitats could be affected through direct and indirect construction impacts and through the embedded landscaped design. **Scoped in** to detailed assessment.

Receptor	Geographic Scale of Importance	Potential Effect Pathway and Rationale for Selection of Features for Detailed Assessment
Other On-Site Habitats	Site	Habitats located within the Site and which will be impacted by the Scheme are all common and widespread habitats locally and regionally however may support other receptors of greater importance. **Scoped in** to detailed assessment.
Ground Nesting Birds	Up to county	Ground nesting bird species may be disturbed during construction, displaced by the presence of solar arrays and affected by habitat changes. Of particular note, up to 125 skylark territories are present. Value considers the Cambridgeshire breeding population of skylark to be 10,000 to 20,000 pairs however no county level population data is available for Bedfordshire however the Thames and Chilterns Bird Atlas (covering Bedfordshire, Berkshire, Buckinghamshire, Oxfordshire and Hertfordshire) shows skylark is widely distributed and present in 90% of tetrads, being absent principally only in tetrads dominated by urban areas. **Scoped in** to detailed assessment.
Breeding Bird Assemblage	Up to county	The breeding bird assemblage may be disturbed during construction and affected by habitat changes. **Scoped in** to detailed assessment.
Non-breeding Birds	Up to Local	Non-breeding bird species may be displaced by the presence of solar panels and affected by habitat changes. Surveys indicated no regular use of the site by significant flocks of non-breeding bird species and therefore any effects are considered unlikely to be significant (refer to ***ES Volume 2 Appendix 7-3***). **Scoped out** of detailed assessment.

Receptor	Geographic Scale of Importance	Potential Effect Pathway and Rationale for Selection of Features for Detailed Assessment
Roosting Bats	Up to county	Trees that offer bat roosting potential will be retained and protected in line with embedded avoidance and mitigation measures (tree retention) and no buildings with bat roosting potential are anticipated to be affected by the Scheme. With the implementation of measures within the embedded **oCEMP [EN010141/DR/7.3]**, no impacts to roosting bats are anticipated. Valued by following UK Bat Mitigation Guidelines[24] based on a precautionary basis assuming presence of barbastelle roosts. **Scoped out** of detailed assessment.
Foraging and Commuting Bats	Up to county	Foraging and commuting bats may be disturbed during construction and behaviourally affected by the presence of solar panels and also by habitat changes. Valued by following UK Bat Mitigation Guidelines. **Scoped in** to detailed assessment.
Badger	Site	Badger is a common and widespread species both locally and nationally, and therefore any effects are unlikely to be assessed as significant. **Scoped out** of detailed assessment. Considered with regards to legislative compliance and best practice mitigation measures only.
Otter	County	Otter are likely present on watercourses adjacent to the Site and they may be subject to disturbance during construction. No impacts are anticipated during operation, with use of the site comparable to or lesser than existing agricultural use. **Scoped in** to detailed assessment (construction only).

Receptor	Geographic Scale of Importance	Potential Effect Pathway and Rationale for Selection of Features for Detailed Assessment
Water Vole	Up to County	Habitats within the Site are suitable to support water vole, if present the species may be affected by new watercourse crossings and habitat changes. **Scoped in** to detailed assessment.
Amphibians	Up to County	Great crested newts are present within the Site and on land within 250m of the Site. In addition priority amphibians (toad) may be present within the Site. Amphibians may be affected by changes to habitats during construction and operation. **Scoped in** to detailed assessment.
Reptiles	Local	The Site may support common species of reptile which could be impacted through changes to habitats during construction and operation. While impacts to a local value receptors are unlikely to be significant, given the scale of the Site and potential for benefits to increase the receptor value, reptiles are **Scoped in** to detailed assessment.
Notable flora	Local	The Site is likely to support an assemblage of common flora typical of lowland agricultural landscapes which may be affected by changes to habitats during construction and operation. Any impact is unlikely to be significant. **Scoped out** of detailed assessment.
Invertebrates	Local	The Site is likely to support an assemblage of common invertebrates typical of lowland agricultural landscapes which may be affected by changes to habitats during construction and operation. While impacts to a local value receptors are unlikely to be significant, given the scale of the Site and potential for benefits to increase the receptor value, invertebrates are **Scoped in** to detailed assessment.

Receptor	Geographic Scale of Importance	Potential Effect Pathway and Rationale for Selection of Features for Detailed Assessment
Other notable mammals	Local	Hare, hedgehog and other notable mammal species are common and widespread locally and nationally but may be affected by changes to habitats during construction and operation. While impacts to a local value receptors are unlikely to be significant, given the scale of the Site and potential for benefits to increase the receptor value, other notable mammals are **Scoped in** to detailed assessment.
Fish	Local	Watercourses are likely to support a typical assemblage of fish species, however will be largely unaffected due to embedded design measures including the use of open span crossings and bailey bridges, as well as implementation of the embedded **oCEMP [EN010141/DR/7.3],** any impact is unlikely to be significant **Scoped out** of detailed assessment.

Construction Phase

7.8.4 Potential construction phase ecological impacts associated with the Scheme are considered to relate to:

- Direct land take (habitat loss) to accommodate the Scheme;
- Temporary disturbance and land take for construction, laydown areas and construction compounds (land restored thereafter);
- Disturbance to, fragmentation or severance of connecting habitat or potential commuting routes within and adjacent to the Site; and
- Disturbance and pollution (indirect effects such as noise and vibration, dust, pollution from surface water run-off) resulting from enabling works and construction, plant and vehicles movements and site workers' activities.

Statutory Designated Sites for Nature Conservation

7.8.5 All statutory designated sites for nature conservation are sufficiently distanced that no direct impacts are anticipated. Similarly, due to the separation distances involved and given the implementation of standard pollution control measures within the embedded **oCEMP [EN010141/DR/7.3]** and **outline Surface Water Management Plan [EN010141/DR/7.13]**, no indirect impacts are anticipated due to pollution from runoff or dust generated during construction.

7.8.6 Eversden and Wimpole Woods SAC is located approximately 17.5km south-east of the Scheme, and is designated for maternity colonies of barbastelle bat, as well as for offering a foraging and commuting area for the species. The Site is sufficiently distant as to lie outside the core sustenance zone of barbastelle bats roosting within Eversden and Wimpole Woods SAC, which is taken to be approximately 6km from a roost site[22].

7.8.7 Barbastelle bats are known to migrate up to 40km between summer and winter roosts[25] and therefore it is feasible that construction of the Scheme could disrupt summer-winter migration routes of bats roosting within Eversden

and Wimpole Woods SAC. The species has been recorded within the Site, although it is not known if individuals using the Site are associated with the Eversden and Wimpole Woods SAC.

7.8.8 With regards to foraging, the barbastelle is associated with broadleaved woodland habitats, and particularly ancient woodlands. When traveling between foraging areas, the species tends to stick to wooded linear features, with open areas not preferred and therefore it is considered likely that the species would also utilise boundary features when migrating between summer and winter roosts. Any loss of hedgerow could disrupt such routes.

7.8.9 Hedgerow habitats will be almost entirely retained and protected with buffer zones of at least 6m, with the exception of small-scale removal/ widening required to permit Site access at 14 locations and totalling 84m with no individual length of removal greater than 6m. Post-construction, seven crossing points, totalling 42m, will be reinstated. Implementation of the landscape design is discussed in relation to operational impacts.

7.8.10 Through the embedded **oCEMP [EN010141/DR/7.3]**, measures will be implemented to ensure any lighting, if required, is directed away from boundary habitats including hedgerows, woodland edge and watercourses to ensure no disruption to bat commuting routes.

7.8.11 Taking into account the small scale of hedgerow removal, embedded stand-off zones and light spill prevention measures embedded within the oCEMP it is concluded that the construction of the Scheme will have no discernible effect on mobile bat qualifying features associated with Eversden and Wimpole Woods SAC.

7.8.12 Minor hedgerow removal will result in no measurable (negligible/ neutral) impacts upon Eversden and Wimpole Woods SAC, a receptor of high sensitivity. Effects are therefore not significant.

7.8.13 **Information to Inform Habitats Regulation Assessment [EN010141/DR/5.7]** has been provided as part of the wider application.

Non-statutory Designated Sites for Nature Conservation

7.8.14 No non-statutory designated sites for nature conservation are located within the Site, and so given all works will be confined to the Site boundary no direct impacts are anticipated on any such site.

7.8.15 Kangaroo meadows CWS is located immediately adjacent to East Park Site B, while Huntingdon Woods CWS is located immediately adjacent to the grid connection route.

7.8.16 Both sites will be clearly demarcated through the use of suitable fencing and signage as set out in the **oCEMP [EN010141/DR/7.3]** to ensure no accidental encroachment. With regards to Huntingdon Woods CWS, designated for the presence of ancient woodland, all trees and woodland will be protected in line with BS 5837 (2012) – *Trees in Relation to Design, Demolition and Construction* and also Natural England and Forestry Commission Standing advice[26], including adhering to buffer zones of at least 15m (as set out in **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]**. The only works permitted within this would be the use of an existing culvert for the temporary construction access, requiring no works which would potentially affect trees or their root protection zones.

7.8.17 Potential indirect impacts relate to disturbance associated with construction noise and vibration, lighting, and pollution resulting from the deposition of dust or runoff. Standard best practice measures to control pollution have been included within the embedded **oCEMP [EN010141/DR/7.3]**, which also stipulates that any lighting used during construction is to be task specific and directed away from boundary habitats.

7.8.18 No permanent infrastructure is proposed within 7m of Kangaroo meadows CWS, with the only works closer than this the implementation of the proposed landscaping. Infrastructure works would include the erecting of perimeter fencing and beyond this siting of panels. Panels would be located approximately 13m from Kangaroo Meadows CWS. A permanent access is

proposed at a distance of 12m from Kangaroo Meadows CWS, utilising an existing field access.

7.8.19 The proposed construction access is located approximately 20m north and east of the Huntingdon Woods CWS, other than where it crosses an existing culvert at a distance of approximately 10m. The construction access will be temporary for the duration of construction only, and will utilise heavy duty construction matting as shown on **ES Vol 3 Figure 2-5: Indicative Construction Access and Compounds [EN010141/DR/6.3] .** Cabling will be located beyond the distance at which impacts to trees or their root protection zones could occur in line with BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction, and also Natural England and Forestry Commission standing advice. Cabling would require no permanent above ground infrastructure. Huntingdon Woods CWS is not a habitat type that would be expected to be strongly influenced by hydrological conditions (i.e., is not a Groundwater Dependent Terrestrial Ecosystem), however construction works in the vicinity of Huntingdon Woods CWS works would not be expected to influence the local hydrological regime.

7.8.20 Both Kangaroo Meadows CWS and Huntingdon Woods CWS have been included as ecological receptors within **ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1]**, which concludes low risk of impacts from dust soiling and also construction phase traffic movements.

7.8.21 Works in proximity to Huntingdon Woods CWS and Kangaroo Meadows CWS will be short term and temporary. Given the implementation of embedded best practice mitigation and avoidance measures, construction of the Scheme is unlikely to have any discernible effect on Huntingdon Woods CWS or Kangaroo Meadows CWS.

7.8.22 All other non-statutory sites for nature conservation are located over 100m from the Site and so are considered sufficiently distanced from the Scheme that no impacts are anticipated.

7.8.23 There will be no direct or indirect impacts on Huntingdon Woods CWS and Kangaroo Meadows CWS, resulting in negligible impacts upon non-statutory designated sites for nature conservation receptors of medium sensitivity. Effects are therefore not significant.

Habitats

Priority and Irreplaceable Habitats

7.8.24 All woodlands and trees will be retained and protected in line with BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction. Where ancient woodland is present, Natural England and Forestry Commission standing advice will be adhered to, including implementing buffer zones of at least 15m for ancient woodland. Further, **ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2]** confirms there will be no impact to the 18 veteran trees and five trees with veteran features identified within the Site. These embedded avoidance measures are set out in the **oCEMP [EN010141/DR/7.3]**. As discussed in relation to Huntingdon Wood CWS above, no impacts are anticipated to this area of ancient woodland from either temporary construction access or cabling works.

7.8.25 A detailed assessment as to the priority status of ponds has not been undertaken, however following a precautionary approach it is assumed that all ponds present within the Site may achieve priority status. All ponds within the Site will be retained and protected throughout construction of the Scheme, with embedded best practice pollution prevention measures outlined within the **oCEMP [EN010141/DR/7.3]** and **outline Surface Water Management Plan [EN010141/DR/7.13]**. No hydrological impacts are anticipated that may affect the hydrological functioning of ponds within or immediately outside of the Site.

7.8.26 Hedgerow habitats within the Site will be retained and protected with buffer zones of at least 6m, with the exception of small-scale removal/ widening required to permit Site access at 14 locations and totalling 84m with no

individual length of removal greater than 6m. Post-construction, seven crossing points, totalling 42m, will be reinstated.

7.8.27 Given the retention of priority habitats, and small scale, largely temporary, hedgerow removal consistent with existing accesses the Scheme is anticipated to result in negligible impacts to priority habitats, particularly considering the abundance of hedgerow habitats within the locality.

7.8.28 The desk study also identified coastal and floodplain grazing marsh and traditional orchards immediately adjacent to the Site. All works would be confined to the Order Limits, and so no direct impacts to habitats beyond the Stie are anticipated. It is not expected that there would be any changes to the hydrological regime underlying coastal and floodplain grazing marsh. Offsite trees, including those associated with traditional orchards will be retained and protected in line with BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction. These habitats are not considered to be sensitive to changes in air quality, however considering embedded measures within the **oCEMP [EN010141/DR/7.3]**, no impacts resulting from changes to air quality are anticipated.

7.8.29 Minor hedgerow removal will result in negligible impacts upon priority habitat receptors of medium sensitivity. Effects are therefore not significant.

7.8.30 Implementation of the landscape proposals is discussed in relation to operational effects.

Other On-Site Habitats

7.8.31 Habitats within the Site generally comprise arable land with grassland margins typical of the region. Arable habitats are common and widespread both locally and nationally and provide negligible value for biodiversity, however grassland field margins offer value for a range of species and can form important networks of habitat to enable a wide range of species to traverse the landscape. Additionally, the Site also encompasses areas of scrub and woodland of higher value to biodiversity.

7.8.32 Higher value habitats such as woodland and scrub, as well as field margin habitats will be retained and protected throughout construction with the implementation of buffer zones of at least 6m around retained boundary habitats including hedgerows and watercourses (i.e., other than the minor removal discussed above) embedded in the **oCEMP [EN010141/DR/7.3]**.

7.8.33 The oCEMP also includes best practice pollution prevention measures to protect watercourses, ditches and ponds within the Site.

7.8.34 Outside of these buffer zones, the majority of arable habitats and some areas of grassland field margins will be subject to permanent loss and/ or subject to temporary disturbance during construction.

7.8.35 A total of 25 new watercourse and ditch crossings and one upgraded watercourse crossing are required, comprising:

- Three horizontal directional drilling crossings;
- Nine trench crossings.
- Two temporary bailey bridges
- Three temporary culverts
- One permanent culvert;
- Seven new permanent open-span crossings; and
- One culvert upgraded to a permanent open-span crossing.

7.8.36 Horizontal directional drill crossings and trench crossings will require only short term and temporary works with no permanent above ground infrastructure remaining on completion. The two temporary baily bridges and temporary culverts will be in place for the duration of construction only. All new crossings of named streams and watercourses will be undertaken using either horizontal directional drilling or through temporary bridges, with use of other techniques applicable only to field ditches. An existing culvert crossing of the Pertenhall Brook will be upgraded to an open-span crossing.

7.8.37 Given the retention of high value habitats, and the Scheme location within mostly low value arable land, the construction of the Scheme, which is

temporary and expected to last approximately 30 months, Temporary removal of non-priority on Site habitats will result in minor adverse impacts upon on-site habitat receptors of low sensitivity which are not significant.

7.8.38 Implementation of the landscape proposals is discussed in relation to operational effects.

Birds

Ground Nesting Birds

7.8.39 Hedgerows will be retained and protected throughout construction with the exception of 84m total of hedgerow, the removal of which will be undertaken following best practice measures outlined within the embedded **oCEMP [EN010141/DR/7.3]** which includes pre-construction checks (if within the nesting bird season). As such, any species which nest at the base of hedgerows will not be directly impacted by the Scheme.

7.8.40 Ground-nesting birds which nest in open farmland habitats, such as skylark (see Table 7.12), are likely to be displaced by construction of the Scheme.

7.8.41 Measures outlined within the **oCEMP [EN010141/DR/7.3]**, including works to be undertaken outside of the bird breeding season where reasonably practicable and the requirement for pre-works checks for nesting birds will ensure no direct impacts. Species afforded protection from disturbance through Schedule 1 of the Wildlife and Countryside Act 1981**Error! Bookmark not defined.** will be further protected under supervision from an EcoCoW. This may include, for example, appropriate disturbance free buffers around an active nest.

7.8.42 Construction of the Scheme could result in the temporary (for the duration of construction) disturbance to ground nesting birds located within and in close proximity to the Site where construction is undertaken within the breeding season. As the Scheme will be implemented in phases, lasting approximately 30 months in total, not all of the Site would be subject to disturbance effects

at the same time, reducing the overall extent of disturbance impacts at any given time.

7.8.43 Given the phased and temporary nature of the construction process, the disturbance of ground nesting bird species is anticipated to result in a minor adverse effect upon receptors of medium sensitivity, which is not significant.

7.8.44 Displacement of ground nesting species may last for the duration of the Scheme and therefore displacement of ground-nesting bird species is discussed further under Operational Effects.

Other Breeding Birds

7.8.45 The most suitable nesting habitat, including hedgerows and woodland, will be protected and retained through construction, with the exception of minor removal of up to 84m of hedgerow as discussed above. Further measures outlined within the **oCEMP [EN010141/DR/7.3]** including timing works outside of the bird breeding season where reasonably practicable and the requirement for pre-works checks where small-scale removal of suitable habitat is required will ensure no direct impacts occur.

7.8.46 If present, species listed on Schedule 1 of the Wildlife and Countryside Act (as amended) and so afforded protection from disturbance will be further protected under supervision from an EcoCoW. This may include, for example, appropriate disturbance free buffers around an active nest.

7.8.47 As discussed in relation to ground nesting species above, construction of the Scheme could result in the temporary (for the duration of construction) disturbance to birds located within the Site and immediately adjacent habitats where construction is undertaken within the breeding season.

7.8.48 The disturbance of breeding bird species resulting from construction activities is anticipated to result in a minor adverse effect on receptors of medium sensitivity, which is not significant.

Bats

Foraging and Commuting

7.8.49 The most important habitats within the Site for foraging and commuting bats, including hedgerow and watercourses will be retained and protected with buffer zones of at least 6m, with the exception of small-scale removal/ widening totalling 84m (maximum 6m in any one location) required to permit Site access, which would not be of a sufficient scale to disrupt or fragment bat flight patterns. Of the hedgerow loss, 42m of this would be temporary and restored post-construction.

7.8.50 Temporary mobile lighting towers may be required at construction compounds during the winter months to comply with health and safety requirements. Construction operations would be limited to 08.00 to 18.00hrs Monday to Friday and 08:00 to 13:00hrs Saturday; darkness would not occur during working hours other than during the period between approximately mid-October and mid-March. As such, the period in which this lighting may be required would broadly coincide with the period in which bats would be hibernating and so is unlikely to disrupt foraging or commuting routes.

7.8.51 The embedded **oCEMP [EN010141/DR/7.3]** includes commitments on lighting, which will ensure that features of value for foraging and commuting bats are not subject to excessive additional lighting during construction of the Scheme.

7.8.52 Given the implementation of embedded best practice avoidance and mitigation measures, construction of the Scheme is unlikely to have any discernible effect and will result in negligible impacts upon foraging and commuting bats of medium sensitivity. Effects are therefore not significant.

Amphibian

7.8.53 Two ponds within the Site (P14 and P25) and four ponds within 250m of the Site (P8, P13, P17 and P29) were shown to support great crested newt

following eDNA survey, and therefore the species as well as other common amphibians may utilise suitable habitats within the Site.

7.8.54 Potential impacts to amphibians relate to the temporary loss of habitat during construction, incidental harm during Site clearance activities, and pollution to aquatic habitat because of contaminant runoff.

7.8.55 All ponds will be retained and protected throughout construction of the Scheme. In order to safeguard aquatic habitats against contaminated runoff, best practice pollution control measures will be implemented as outlined within the embedded **oCEMP [EN010141/DR/7.3]**.

7.8.56 Habitats within the Site primarily comprise arable land of negligible value for amphibians, however boundary habitats of hedgerows and rough grassland provide more favourable habitats. With the exception of minor removal/ widening required for access, hedgerows will be retained and protected through the embedded design with minimum buffer distances of 6m.

7.8.57 Works are required within approximately 10m of P14 and P25, both of which are known to support great crested newt. No permanent above ground infrastructure works are required within 50m of any other pond with known or assumed newt presence. Cabling and temporary construction access are required within 50m of P46 which has not been subject to survey and following a precautionary approach may support great crested newt.

7.8.58 The temporary loss of a small amount of agricultural land in proximity to these ponds throughout the duration of construction is not considered to adversely affect great crested newt. The **oCEMP [EN010141/DR/7.3]** includes best practice measures designed to ensure individual great crested newt are not affected, including fitting any excavations (e.g., cable trenches) with a means of escape to prevent entrapment.

7.8.59 Due to the risk to individual great crested newt, the **oCEMP [EN010141/DR/7.3]** includes the requirement to obtain a European Protected Species Mitigation Licence prior to onset of works within 250m of any with known or assumed great crested newt presence pond. Prior to granting any

such licence, Natural England would need to be satisfied there is no overall detriment to great crested newt favourable conservation status.

7.8.60 The **oCEMP [EN010141/DR/7.3]** includes pre-construction surveys, species protection plans and RAMs in order to safeguard amphibians which will serve to minimise any risk of incidental harm to individual amphibians.

7.8.61 Due to the risk of harm to individual great crested newt associated with specific ponds identified as supporting this species the Scheme is considered to result in a minor adverse effect on great crested newt and other amphibian species of a medium sensitivity, which is not significant.

Reptiles

7.8.62 Potential impacts to reptiles relate to the temporary loss of habitat during construction and incidental harm during Site clearance activities.

7.8.63 Habitats within the Site primarily comprise arable land of negligible value for reptiles, however boundary habitats of hedgerows and rough grassland provide more favourable habitats. With the exception of minor removal/ widening required for access, hedgerows will be retained and protected through the embedded design with minimum buffer distances of 6m.

7.8.64 The **oCEMP [EN010141/DR/7.3]** sets out that species protection plans and RAMs must be provided in order to safeguard reptiles which will serve to minimise any risk of incidental harm to individual amphibians.

7.8.65 Given the implementation of embedded best practice avoidance and mitigation measures, construction of the Scheme is unlikely to have any discernible effect and result in negligible impacts upon on reptiles of low sensitivity. Effects are therefore not significant.

Otter

7.8.66 Previous records of otters are known on the River Kym, with several watercourses within and immediately adjacent to the Site considered to offer

suitable habitat for the species, including the Duloe Brook, an unnamed watercourse in Site B and field ditches.

7.8.67 The embedded design includes buffers of at least 10m from all watercourses and ditches, with the exception of the following crossing points:

- Three horizontal directional drilling crossings;
- Nine trench crossings.
- two temporary bailey bridges
- Three temporary culverts
- One permanent culvert;
- Seven new permanent open-span crossings; and
- One culvert upgraded to a permanent open-span crossing.

7.8.68 Horizontal directional drill crossings and trench crossings will require only short term and temporary works with no permanent above ground infrastructure remaining on completion. The two temporary bailey bridges and temporary culverts will be in place for the duration of construction only.

7.8.69 Of these locations, targeted surveys of crossing points (as shown on **ES Vol 3 Figure 2-3: Indicative Crossing Plans [EN010141/DR/6.3]** found habitat suitable to support otter at C01, C05a, C05b, C58a and C58b. Additionally, C35, C37, C53 and C54 may support occasional use by otter for commuting, but water levels were found insufficient to support regular foraging.

7.8.70 Any otters present in the immediate vicinity of the Site may be subject to disturbance as a result of construction noise. No works other than landscaping is proposed in proximity to the River Kym.

7.8.71 The Duloe Brook (C58a and C58b) and an unnamed tributary of the Pertenhall Brook (C05a and C05b) will be crossed by the 33kV cable (horizontal directional drill) and temporary access route (bailey bridge) while the Pertenhall Brook (C01) will be subject to the upgrade of an existing culvert to an open-span crossing. It is not considered the proposed temporary bailey bridges or open span crossing are of a sufficient scale or form to result in

fragmentation of otter foraging and commuting habitats. Otter would readily pass through proposed structures, or utilise adjacent, unimpeded terrestrial habitats.

7.8.72 While otters are reclusive, they can be relatively tolerant to human presence, as indicated by their presence within urban areas (including nearby St Neots), and so are likely to habituate to human activity[27] associated with construction of the scheme, including regular vehicle movements. Sudden startling noises may however result in disturbance.

7.8.73 Works will be phased, and therefore works in any one location are likely to be relatively short in duration. As otter utilise a network of several holts and above ground resting sites within a large home range, it is considered likely that otter would relocate elsewhere within their territory for the duration of works in one area. Works will not be undertaken outside of typical daytime hours (08:00 to 18:00) and so be unlikely to affect nighttime foraging. Further, the **oCEMP [EN010141/DR/7.3]** includes for pre-construction surveys in relation to otter, including of suitable aquatic and terrestrial habtiat within 100m of the Site to identify potential holts/ resting sites.

7.8.74 Due to the risk of disturbance to otter utilising a resting place, the **oCEMP [EN010141/DR/7.3]** includes the requirement to obtain a European Protected Species Mitigation Licence prior to onset of works within 100m of any resting site identified during pre-construction surveys. Prior to granting any such licence, Natural England would need to be satisfied there is no overall detriment to otter favourable conservation status.

7.8.75 Temporary disturbance to otters for the duration of construction is considered to result in a minor adverse effect on otters of a medium sensitivity, which is not significant.

7.8.76 Permanent culverts remaining in place for the lifetime of the Scheme are discussed further in relation to operational effects.

Water Vole

7.8.77 As discussed in relation to otter, the embedded design includes buffers of at least 10m from all watercourses and ditches, with the exception of the following crossing points:

- Three horizontal directional drilling crossings;
- Nine trench crossings.
- two temporary bailey bridges
- Three temporary culverts
- One permanent culvert;
- Seven new permanent open-span crossings; and
- One culvert upgraded to a permanent open-span crossing.

7.8.78 Horizontal directional drill crossings and trench crossings will require only short term and temporary works with no permanent above ground infrastructure remaining on completion. The two temporary bailey bridges and temporary culverts will be in place for the duration of construction only.

7.8.79 No definitive evidence of water vole was identified during targeted surveys, however six locations (as shown on **ES Vol 3 Figure 2-3: Indicative Crossing Plans [EN010141/DR/6.3]** offered suitable habitat for water vole (these being C01, C05a, C05b, C35, C53, C54, C58a, and C58b) with C37 potentially suitable. No definitive evidence of water vole presence was identified, but signs indicating likely presence were identified at C54 and possible presence at C58a and C58b.

7.8.80 C54 will be subject to horizontal directional drilling techniques only, with entry and exit pits located greater than 10m from the bank toe and so considered unlikely to affect water vole burrows.

7.8.81 Works at C58a and C58b includes the installation of a temporary bailey bridge and horizontal directional drilling of cabling. As discussed above, horizontal directional drilling is not considered to affect water vole or their burrows. The proposed temporary bailey bridge will be sited on concrete footings located

over 5m from the bank top and so unlikely to affect water vole burrows. Minor loss of vegetation might be expected under bailey bridges, but this is likely to be highly localised, insignificant in the context of locally available habitat resource and temporary for the duration of construction only.

7.8.82 Of crossings suitable to support water vole but where no evidence was identified, C37 and C53 are both use of existing culverts with no additional impacts anticipated. C05a / C05b involve horizontal directional drilling and fitting of a bailey bridge with works and impacts similar to those described above.

7.8.83 Works at C01 involves upgrading an existing culver to an open span crossing; given the presence of an existing culvert at this location, additional impacts are considered to be minimal. Works at C35 will involve a new open span crossing. This watercourse has been historically dry and so likely unsuitable for water vole in most years with no evidence identified during survey. As such, likelihood of water vole presence and scale of impacts at these highly localised works areas is considered negligible.

7.8.84 The embedded **oCEMP [EN010141/DR/7.3]** includes pre-construction surveys to be undertaken at watercourses potentially suitable for water vole to confirm presence or likely absence. Where water vole presence is identified, no works would be undertaken until a licence has been obtained from Natural England or the design is amended to avoid impacts.

7.8.85 Any works affecting habitat identified as suitable for water vole will be highly localised and will be undertaken following RAMs outlined within the embedded **oCEMP [EN010141/DR/7.3]** to ensure no direct impacts to water vole.

7.8.86 Given the small scale and localised nature of the works construction of the Scheme will have negligible impacts upon water voles of medium sensitivity, which is not significant.

Other Notable Species

7.8.87 Construction of the Scheme has the potential to impact upon other notable species including invertebrates and priority mammals. All such species are associated with margin and boundary habitats including hedgerows, ditches and watercourses.

7.8.88 Boundary habitats will be largely retained and protected throughout construction with the embedded design including buffers of at least 6m, other than localised crossing and access locations. Any such localised works would be undertaken under RAMs outlined in the embedded **oCEMP [EN010141/DR/7.3]**. Post-construction, seven crossing points, totalling 37m, will be reinstated.

7.8.89 Given the small scale and localised nature of the works, construction of the Scheme will have negligible impacts upon other notable species of medium sensitivity. Effects are therefore not significant.

Operational Phase

7.8.90 Operational effects are defined as effects following the construction of the Scheme. Effects may be for the entire duration of the operational lifetime or be temporary and short-term in nature. Some effects may reduce with habituation or remain for the lifetime of the Scheme.

7.8.91 Potential operational phase impacts associated with the Scheme are considered to relate to:

- Implementation of landscaping and habitat creation as part of the Illustrative Environmental Masterplan;
- Displacement of ground nesting bird species;
- Behavioural changes associated with the presence of panels;
- Disturbance and incidental impacts associated with routine maintenance (e.g., grass and hedgerow cutting); and
- Noise emissions from inverters, transformers, and the East Park BESS.

7.8.92 There are no additional operational impacts relating to land take other than those already addressed under construction.

7.8.93 Maintenance of a solar farm is generally limited to routine cleaning using a soft brush and water and ongoing maintenance of landscaping, habitats and green infrastructure. Occasional repairs and/ or replacements may also be required in the event of faulty or damaged equipment.

Statutory Designated Sites for Nature Conservation

7.8.94 The Site is sufficiently distanced from any statutory designated sites for nature conservation that no direct impacts are anticipated as a result of the operation of the Scheme. Similarly, the distances are sufficient to ensure no impact as a result of runoff (e.g., associated with panel cleaning).

7.8.95 As discussed in relation to construction above, Eversden and Wimpole Woods SAC is located approximately 17.5km from the Scheme and so within the range in which barbastelle may migrate between summer roosts at Eversden and Wimpole Woods SAC and winter roosts. Once operational, the cable route, which lies closest to Eversden and Wimpole Woods SAC will have no discernible long-term impact. East Park Sites A to D are located approximately 20.5km from Eversden and Wimpole woods SAC at their closest point, which is within the summer-winter migration distance of 40km.

7.8.96 Emerging evidence (Tinsley *et al*, 2023[28]) suggests that the presence of solar arrays may affect bat activity in some species, and therefore the presence of panels through operation could disrupt summer-winter migration routes of barbastelle associated with Eversden and Wimpole Woods SAC.

7.8.97 While studies into the effects of solar arrays on bats activity are at this time limited, with regards to barbastelle, Tinsley *et al* (2023) found no statistically significant beneficial or adverse effect resulting from the presence of solar panels on barbastelle bats, and therefore it is concluded that the operation of the Scheme is unlikely to have any discernible effect on mobile bat qualifying features associated Eversden and Wimpole Woods SAC.

7.8.98 Further, bat flightline routes will be retained and protected through operation including the implementation of buffer zones of at least 6m in which no development will be located, which was given as a key mitigation consideration within Tinsley *et al* (2023).

7.8.99 The operation of the Scheme is considered to have negligible impacts upon statutory designated sites of up to high value, which is not significant.

7.8.100 **Information to Inform Habitats Regulation Assessment [EN010141/DR/5.7]** has been provided as part of the wider application.

Habitats

Priority and Irreplaceable Habitats

7.8.101 Throughout operation no impacts would be expected to ancient woodland or veteran trees within and immediately adjacent to the Site.

7.8.102 The illustrative landscape proposals on **ES Volume 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** include the planting of over 17km of native species hedgerow.

7.8.103 Hedgerow removal during construction totals 84m with seven crossing points, totalling 42m, directly reinstated following completion of construction works. The remaining 42m would be replaced elsewhere within the Site, ensuring no net loss of hedgerow priority habitat. The remainder of hedgerow creation would be an enhancement.

7.8.104 In addition, the embedded **oLEMP [EN010141/DR/7.7]** includes for the management of both created and retained hedgerow for the lifetime of the Scheme.

7.8.105 Overall, it is considered through the implementation of the landscape proposals and oLEMP that the extent and quality of priority habitats within the Site will be enhanced, resulting in a moderate beneficial effect on a receptor of medium value that is significant.

Other On-Site Habitats

7.8.106 The footprint of a solar development is small, with infrastructure (e.g., frames) typically taking up less than 5% of the Site area, with the land surrounding and underneath panels available for habitat creation, and therefore habitat loss through operation will be negligible, particularly in the context of baseline low ecological value agricultural habitats.

7.8.107 The illustrative landscape proposals on **ES Vol 2 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** include the seeding of approximately 205 ha of species-diverse grassland and 448 ha of grazing pasture, and the planting of 19 ha of woodland and 375 individual trees.

7.8.108 Such habitats will increase the intrinsic biodiversity value of the Site. Further, habitats will be relatively undisturbed beyond routine maintenance and necessary habitat management as outlined within the embedded **oLEMP [EN010141/DR/7.7]**.

7.8.109 Additionally, during operation of the Scheme there will be a cessation of spraying of herbicides, pesticides and nutrient enrichment associated with arable farming.

7.8.110 Operation of the Scheme will have a minor beneficial effect on on-site habitats of low value, which is not significant.

Birds

Ground Nesting Birds

7.8.111 The presence of solar panels is likely to cause displacement of ground nesting bird species that favour open landscapes for nest locations, principally skylark and lapwing, however all ground nesting species identified during baseline surveys are considered.

7.8.112 Embedded mitigation measures have been incorporated into the Illustrative Environmental Masterplan through the creation of large areas of open grassland that will be managed through the **oLEMP [EN010141/DR/7.7]** to be

of benefit for skylark and lapwing and to encourage nesting attempts within these areas.

7.8.113 While it is generally acknowledged that ground nesting birds of open spaces, including skylark and lapwing, are unlikely to nest within solar arrays, those skylarks within adjacent land will continue to use land under and around solar arrays as a foraging resource[29], and may also use solar sites as a nursery area[30]. In support of this, a comparative study by Montag et al (2016)[31] found no statistical difference in the number of territories between solar and control plots. As such, the presence of the Scheme does not render the Site unsuitable for use by skylarks, but will reduce and potentially remove nesting opportunities amongst solar array areas.

7.8.114 Agricultural intensification, and specifically the widespread use of autumn sown cereal crops is considered the principal driver of skylark declines through reducing the number of successful nesting attempts able to be made in any given year[32]. Once a crop grows sufficiently tall, skylark will cease nesting amongst such crops which reduces late-season nesting attempts in particular.

7.8.115 While nesting opportunities within the array areas may be removed, it is expected that large areas of open grassland will continue to offer suitable nesting habtiat within much of the Site. Skylarks nesting within these areas have the potential to be more productive than their counterparts nesting within cereal crops, due to the ability to raise multiple broods in any given nesting season.

7.8.116 In addition, the presence of the solar farm and associated landscaping is likely to result in an overall increase in invertebrate abundance within the Site and immediate surrounds which is the preferred prey of skylark within the breeding season. As such, during operation of the Scheme, the Site will offer a high value foraging resource for ground nesting birds that is guaranteed to persist for the lifetime of the solar development and that will not vary with cropping patterns, themselves influenced by market forces. Coupled with maintained areas of open grassland within the Site and agricultural land in proximity to

the Scheme continuing to offer suitable nesting habitats, it is likely that the presence of the Scheme will contribute to negligible overall change in ground nesting bird productivity at a population level.

7.8.117 Other ground nesting species recorded (grey partridge, quail, yellow wagtail and corn bunting) will nest at field edges and so are considered less susceptible to displacement, particularly given the presence of grassland margins.

7.8.118 Overall, displacement of ground nesting species as a result of panels will result in minor adverse effects to ground nesting birds of medium value, which is not significant.

Other Breeding Birds

7.8.119 Hedgerow removal during construction totals 84m with seven crossing points, totalling 42m, directly reinstated following completion of construction works. The remaining 42m would be replaced elsewhere within the Site, ensuring no net loss of hedgerow nesting habitat. The remainder of hedgerow creation would be an enhancement.

7.8.120 The illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** include the planting of over 17km of native species hedgerow, 19 ha of woodland planting and 375 trees. Creating hedgerows, woodland and trees will offer increased nesting habitat for a range of notable and non-notable breeding bird species.

7.8.121 In addition, foraging habitat for breeding birds will be enhanced through the creation of approximately 205 ha of species-diverse grassland which will increase insect prey resource and the planting of fruit bearing species within hedgerows.

7.8.122 The embedded **oLEMP [EN010141/DR/7.7]** includes for the management of both created and retained hedgerow for the lifetime of the Scheme.

7.8.123 Increased nesting and foraging habitat will result in a moderate beneficial effect on the breeding bird assemblage of medium value which is significant.

Bats

Foraging and Commuting

7.8.124 As discussed in relation to statutory designated sites, emerging evidence (Tinsley *et al, 2023)* has suggested that foraging and commuting bats may be affected by the presence of solar arrays. Measures outlined in Tinsley *et al*, including maintaining boundary habitats and including planting to improve foraging resources have been incorporated into the landscape proposals of the Scheme.

7.8.125 Hedgerow removal during construction totals 84m with seven crossing points, totalling 42m, directly reinstated following completion of construction works. Residual minor gaps of maximum 6m are consistent with existing farm access (for example) not considered to present a barrier that would obstruct existing bat foraging and commuting routes.

7.8.126 The remaining 42m lost during construction and not directly replaced would be compensated for elsewhere within the Site, ensuring no net loss of bat foraging and commuting habitat. The remainder of the 17km hedgerow creation would be an enhancement.

7.8.127 It is considered that the illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]**, including over 205 ha of species diverse grassland, hedgerow planting and woodland planting will enhance the landscape for both foraging and commuting bats. This will be achieved by providing greater connectivity at a landscape scale through linear features and increasing the invertebrate prey resource through increased habitat quality and diversity of a previously homogenous landscape.

7.8.128 Given the embedded mitigation in the landscape proposals and the **oLEMP [EN010141/DR/7.7]**, namely hedgerow and grassland creation, the Scheme will result in moderate beneficial effect on the foraging and commuting bat assemblage of medium value which is significant.

Amphibian

7.8.129 During operation of the Scheme the habitats within the Site will be enhanced for amphibians through the illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]**, including over 205 ha species diverse grassland and 17km of hedgerow. which will offer enhanced foraging and refuge opportunities.

7.8.130 Given the embedded implementation in the landscape proposals and the **oLEMP [EN010141/DR/7.7]**, the Scheme will have a minor beneficial effect on amphibian species of medium value for the lifetime of the Scheme which is not significant.

Reptiles

7.8.131 During operation of the Scheme the habitats within the Site will be enhanced for reptiles through the illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]**, including over 205 ha of species diverse grassland and 17km of hedgerow. which will offer enhanced foraging and refuge opportunities.

7.8.132 Given the embedded implementation of the landscape proposals and the **oLEMP [EN010141/DR/7.7]** the Scheme will have a minor beneficial effect on reptiles of low value for the lifetime of the Scheme which is not significant.

Otter

7.8.133 Routine management of the Scheme will result in minimal disturbance, with only routine cleaning, maintenance and replacements (e.g., in case of equipment failure) and landscaping required. It is considered that such activities are comparable with existing agricultural practices and would not result in additional disturbance to otter.

7.8.134 Eight open-span crossings and one permanent culvert will remain in place for the lifetime of the Scheme, all located along field ditches which offer less suitable habitat for otter, and likely to be used only infrequently. Open-span crossings are not considered to present a barrier to otter movement, while the

single permanent culvert will be limited in width, consistent with those already present across the Site and so unlikely to present a barrier to otter.

7.8.135 Overall, it is considered the operation of the Scheme will result in negligible impacts to otter of medium value which is not significant.

Water Vole

7.8.136 Eight open-span crossings and one permanent culvert will remain in place for the lifetime of the scheme. Open-span crossings are not considered to present a barrier to water vole movement, while the single permanent culvert will be limited in width, consistent with those already present across the Site and so unlikely to present a barrier to water vole.

7.8.137 The illustrative landscape proposals will enhance ditch top habitats for water vole, offering greater foraging and sheltering habitat for this species.

7.8.138 Overall, it is considered the operation of the Scheme will result in negligible impacts to water vole of medium value which is not significant.

Other Notable Species

7.8.139 During operation of the Scheme the habitats within the Site will be enhanced for invertebrates and notable mammals through the illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]**, including over 205 ha of species diverse grassland and 17km of hedgerow which will offer enhanced foraging and refuge opportunities through increased habitat diversity and quality.

7.8.140 Further, the operation of the Scheme will not require the application of herbicide and pesticide treatments as are frequently used as part of arable farmland systems, and that would likely continue to be used in the absence of the Scheme, and so benefit the floristic and insect diversity on Site.

7.8.141 Given the implementation of the landscape proposals and the **oLEMP [EN010141/DR/7.7]**, as well as the reduction in chemical insecticide use, the

Scheme will have a minor beneficial effect on other notable species of low value for the lifetime of the Scheme, which is not significant.

Decommissioning

7.8.142 The application for development consent is predicated on the development being decommissioned 40 years, or less, after it has been commissioned. Following decommissioning, it is considered likely that the land would revert to its baseline conditions.

7.8.143 Impacts arising for decommissioning are considered to be commensurate with those experienced during construction and are therefore not assessed in detail. Any impacts arising from decommissioning are likely to be considered capable of being reversed within a very short period of time following cessation of decommissioning activities.

7.9 Additional Mitigation and Monitoring

Mitigation

7.9.1 Additional mitigation measures to reduce potentially significant adverse effects upon ecological features resulting from the Scheme, and/ or to ensure legislative compliance are detailed below.

Construction Mitigation

7.9.2 No additional mitigation or enhancement is considered necessary during the construction of the Scheme to mitigate for any impacts (either significant or non-significant) on ecological receptors. Impacts have been addressed as far as reasonably practicable through avoidance and the embedded mitigation of the Scheme.

Operational Mitigation

7.9.3 No additional mitigation is considered necessary during the operation of the Scheme to mitigate for any impacts on ecological receptors. Impacts have been addressed as far as reasonably practicable through avoidance and the embedded mitigation of the Scheme.

Decommissioning Mitigation

7.9.4 No additional mitigation or enhancement is considered necessary during the decommissioning of the Scheme to mitigate for any impacts (either significant or non-significant) on ecological receptors. Impacts have been addressed as far as reasonably practicable through avoidance and the embedded mitigation of the Scheme.

Monitoring

7.9.5 Monitoring will be undertaken in years 1, 2, and 5, then every 5 years thereafter until at least year 30 following implementation of the landscape design in line with BNG requirements and as set out in the **oLEMP [EN010141/DR/7.7]**.

7.9.6 Monitoring will involve a habitat survey (between May and September) following the industry standard UK Habitat Survey (UKHab) methodology[33] as used for BNG, and also including a condition assessment using the relevant condition criteria contained within Defra statutory Metric. This monitoring would inform any adjustments or remedial measures to be implemented, if required.

7.9.7 Monitoring would also include an assessment of species enhancement measures (e.g., wildlife boxes) as outlined in Section 7.7, including an assessment of the integrity of such features. Where appropriate usage of such features will also be assessed. Monitoring will inform the requirement for repair or replacement, as required.

7.10 Residual Effects

7.10.1 Residual effects are summarised in Table 7.14.

Significant Effects

7.10.2 The scheme will not result in any significant residual adverse effects upon ecological receptors, including statutory or non-statutory sites designated for nature conservation.

7.10.3 Throughout operation, the Scheme will result in a significant beneficial effect on priority habitats, due to extensive creation of more than 17km of native species hedgerow as part of the landscape proposals.

7.10.4 Throughout operation, the Scheme will also result in a significant beneficial effect on other breeding birds and foraging and commuting bats due to the provision of high-quality habitats as part of the landscape proposals.

Non-significant Effects

7.10.5 During construction, the Scheme may result in short term and temporary minor adverse effects on ground nesting birds, the wider breeding bird assemblage and otter as a result of construction related disturbance.

7.10.6 Through operation, the scheme will result in a minor adverse effect on ground nesting birds due to displacement of skylark, partially mitigated for by the embedded landscape design. There will be no additional residual adverse effects upon ecological receptors.

7.10.7 During operation of the Scheme, taking into account embedded and adopted measures, as well as additional mitigation and enhancement measures, the Scheme will result in non-significant beneficial effects for the following receptors for the duration of the Scheme's operational lifespan:

- On-site habitats;
- Roosting bats;
- Amphibians;

- Reptiles; and
- Other notable species (including flora, invertebrates, mammals and fish).

Table 7.14: Summary of Residual Effects

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
Construction								
Statutory designated Sites	Retention and buffering of boundary features. Lighting strategy via the oCEMP.	Disruption of flightline of mobile bat qualifying features due to hedgerow removal and construction lighting	Indirect, temporary	Negligible	International	Neutral	None	Neutral
Non-statutory Designated Site (Kangaroo Meadows CWS and Huntingdon woods CWS)	Best practice pollution control via the oCEMP. Lighting strategy via the oCEMP.	Pollution	Indirect, temporary	Negligible	County	Neutral	None	Neutral
Priority and irreplaceable habitats	Retention and buffering of features. Best practice pollution control within the OCEMP.	Hedgerow removal (84m total)	Direct, permanent	Negligible	County	Minor	None	Neutral

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
Other on-Site habitats	Retention and buffering of features. Best practice pollution control within the oCEMP.	Habitat loss (including arable land and field ditches)	Direct, permanent	Low	Site	Minor	None	Minor adverse, not significant
		Pollution	Indirect, temporary	Low				
Ground Nesting Birds	Pre-construction check within the oCEMP. Phased construction. Timing of works.	Damage to nests	Direct, permanent	Low	County	Minor	None	Minor adverse, not significant
		Disturbance	Indirect, temporary	Low				
		Displacement	Indirect, permanent	Moderate				
Breeding Bird Assemblage	Retention and buffering of boundary features. Pre-construction check within the oCEMP.	Damage to nests during vegetation clearance (84m of hedgerow)	Direct, permanent	Low	County	Minor	None	Minor adverse, not significant.
		Habitat loss (up to 84m of hedgerow)	Direct, temporary	Low				

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
	Phased construction. Timing of works.	Disturbance (e.g., noise, lighting)	Indirect, temporary	Moderate				
Foraging and Commuting Bats	Retention and buffering of boundary features. Lighting strategy within the oCEMP. Working hours.	Habitat loss (up to 84m of hedgerow)	Indirect, temporary (42m reinstated crossing points) Indirect, permanent (17m)	Negligible	County	Minor	None	Negligible
		Disturbance (e.g., noise, lighting)	Indirect, temporary	Negligible				
Amphibians	Retention and buffering of pond and boundary features.	Habitat loss	Indirect, permanent	Low	County	Minor	None	Minor adverse, not significant
		Incidental killing/ injury	Direct, permanent	Low				

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
	RAMs within the oCEMP. Pre-construction check within the oCEMP. Phased construction.	Pollution of aquatic habitats	Indirect, temporary	Low				
Reptiles	Retention and buffering of boundary features (embedded). RAMs within the oCEMP (embedded). Pre-construction check within the oCEMP (embedded). Phased construction (embedded).	Habitat loss	Indirect, permanent	Negligible	Local	Minor	None	Negligible
		Incidental killing/ injury	Direct, permanent	Negligible				
Otter	Retention and buffering of	Disturbance (noise and lighting)	Indirect, temporary	Moderate	County	Minor	None	Minor adverse,

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
	watercourse boundary features. Pre-construction check within the oCEMP. Lighting strategy within the oCEMP. Working hours. Phased construction.	Fragmentation (watercourse crossing points)	Indirect, temporary (3x horizontal drill crossings, 9x trench crossings, 3x culverts, 2x bailey bridges) Indirect, Permanent (8 x open-span crossings, 1x culvert)	Low				not significant
Water Vole	RAMs within the oCEMP. Retention and buffering of boundary features. Pre-construction check within the oCEMP.	Direct mortality	Direct, permanent	Negligible	County	Negligible	None	Negligible
		Habitat loss	Indirect, temporary (3x horizontal drill crossings, 9x trench crossings, 3x culverts, 2x bailey bridges) Indirect, Permanent (8 x open-span	Negligible				

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
			crossings, 1x culvert)					
		Fragmentation (watercourse crossing points)	Indirect, temporary (3x horizontal drill crossings, 9x trench crossings, 3x culverts, 2x bailey bridges) Indirect, Permanent (8 x open-span crossings, 1x culvert)	Negligible				
Other notable species	RAMs within the oCEMP. Retention and buffering of	Direct mortality	Direct, permanent	Negligible	Local	Minor	None	Negligible

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
	boundary features. Pre-construction check within the oCEMP.	Habitat loss	Indirect, Permanent	Negligible				
Operation								
Statutory designated Sites	Retention and buffering of boundary features	Disrupted flightlines of mobile bat qualifying features due to presence of panels	Indirect, permanent	Negligible	International	Negligible	None	Negligible
Priority and irreplaceable habitats	Implementation of the landscape design	Habitat creation and management	Direct, permanent	Moderate	County	Moderate	None	Moderate beneficial, significant
Other on-Site habitats		Habitat creation and management	Direct, permanent	Moderate	Site	Minor	None	Minor beneficial,

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
	Implementation of the landscape design	Cessation of agricultural inputs, including fertiliser herbicide use	Direct, permanent	Low				not significant
Ground Nesting Birds	Implementation of the landscape design	Displacement	Indirect, permanent	Moderate	County	Minor adverse	None	Minor adverse, not significant
		Habitat creation and management	Indirect, permanent	Moderate				
		Cessation of agricultural inputs, including pesticides leading to improved foraging habitat	Indirect, permanent	Low				
Breeding Bird Assemblage	Retention and buffering of boundary features. Implementation of the landscape design.	Habitat creation and management (including (40 no. general purpose bird boxes, 6 no. barn owl boxes and 3 no. raptor boxes)	Indirect, permanent	Moderate	County	Moderate	None	Moderate beneficial, significant
		Cessation of agricultural inputs,	Indirect, permanent	Low				

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
		including pesticides leading to improved foraging habitat						
Foraging and Commuting Bats	Retention and buffering of boundary features Implementation of the landscape design	Habitat creation and management	Indirect, permanent	Moderate	County	Moderate	None	Moderate beneficial, significant
		Cessation of agricultural inputs, including pesticides leading to improved foraging habitat	Indirect, permanent	Low				
Amphibians	Retention and buffering of boundary features Implementation of the landscape design	Habitat creation and management (including 10 no. refugia)	Indirect, permanent	Low	County	Minor	None	Minor beneficial, not significant
		Cessation of agricultural inputs, including pesticides leading to improved foraging habitat	Indirect, permanent	Low				

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
Reptiles	Retention and buffering of boundary features Implementation of the landscape design	Habitat creation and management (including 10 no. refugia)	Indirect, permanent	Low	Local	Minor	None	Minor beneficial, not significant
		Cessation of agricultural inputs, including pesticides leading to improved foraging habitat	Indirect, permanent	Low				
Otter	Retention and buffering of boundary features	Fragmentation	Indirect, permanent	Negligible	County	Negligible	None	Negligible
Water Vole	Retention and buffering of boundary features Implementation of the landscape design	Fragmentation	Indirect, permanent	Low	County	Negligible	None	Negligible
		Habitat creation and management	Indirect, permanent	High				

Feature/ Receiving Environment	Embedded Mitigation/ Enhancement Measures	Description of Impact	Nature of Impact	Magnitude of Impact	Geographical Importance	Significance of Effects	Additional Mitigation / Enhancement Measures	Residual Effects
Other notable species	Fencing to include mammal gaps (design parameter) Retention and buffering of boundary features Implementation of the landscape design	Habitat creation and management (including hedgehog boxes)	Indirect, permanent	Low	Local	Minor	None	Minor beneficial, not significant
		Cessation of agricultural inputs, including pesticides	Indirect, permanent	Low				

7.11 Cumulative Effects

7.11.1 The cumulative assessment has considered the potential for cumulative ecological impacts to receptors as a result of the Scheme in combination with the cumulative schemes set out in **ES Vol 2 Appendix 4-5: Short List of Other Development [EN010141/DR/6.2]**.

7.11.2 Specific to ecology the assessment of cumulative effects has been made with reference to CIEEM guidelines for EcIA.

7.11.3 An assessment of impacts upon static ecological features (e.g., habitats) has been made only for schemes which are located within or immediately adjacent to the Site. These comprise:

- Bassmead Manor and High Wood Solar;
- Cobholden Farm BESS; and,
- Land North and South of Bushmead Road.

7.11.4 Both A428 Black Cat to Caxton Gibbet and East West Rail are physically separated from the Scheme, and as such, only mobile terrestrial features have been considered with regards to cumulative effects.

7.11.5 Similarly, where a receptor has been assessed within this chapter following implementation of mitigation as having either a negligible or neutral residual effect (i.e., no discernible effect in any direction) it has been determined that there is no possibility of significant inter-project cumulative effects with the identified schemes and as such, these receptors are not included within the assessment of cumulative effects.

7.11.6 In assessing the cumulative effects it has been assumed that all development will be required to adhere to legislative requirements currently in effect.

7.11.7 The cumulative assessment with respect to ecological receptors is reported in **ES Vol 1 Chapter 17: Cumulative and In-Combination Effects [EN010141/DR/6.1]** and concludes that there would be no significant cumulative effects as a result of the Scheme in combination with any

cumulative scheme. The residual effects of the Scheme would not be changed as a result of any of the cumulative schemes.

7.11.8 An assessment of the in-combination effects arising from the interaction and combination of different residual environmental effects of the Scheme affecting a single receptor is reported in Section 17.5 of **ES Vol 1 Chapter 17: Cumulative and In-Combination Effects [EN010141/DR/6.1]**.

7.12 Conclusions

7.12.1 The Scheme will not result in any significant residual adverse effects upon ecological receptors.

7.12.2 During the construction phase the Scheme would result in short term and temporary minor adverse effects on ground nesting birds, the wider breeding bird assemblage, amphibians (including great crested newt) and otter.

7.12.3 During the operational phase the Scheme will result in a significant beneficial effect on priority habitats, other breeding birds and on foraging and commuting bats and will result in beneficial (not significant) effects for other ecological receptors.

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