



East Pye Solar Applicant's Position on White Clawed Crayfish

Revision 1

September 2026

Planning Inspectorate Reference: EN0110014

Document Reference: EXAM/8.5

The Infrastructure Planning (Examination Procedure) Rules 2010

Contents

1	Applicants response	1
1.1	Introduction and Purpose	1
1.2	Background and Relevant Representations	1
1.3	Applicants Position	1
2	Applicant Assessment and Position	3
2.1	Habitat Suitability and Survey Evidence	3
2.2	Precautionary Assessment and Embedded Mitigation.....	4
2.3	Position on Further Survey Requirements	5
3	Conclusion	8

1 Applicants response

1.1 Introduction and Purpose

- 1.1.1 This Applicant's Position Statement has been prepared in response to the Examining Authority's **Rule 6 Letter [PD-005]** and is submitted at Procedural Deadline A.
- 1.1.2 The purpose of this document is to provide further information on the assessment of potential effects on white-clawed crayfish (*Austropotamobius pallipes*), including the Applicant's position on habitat suitability, survey requirements, embedded mitigation measures and the likelihood of significant effects arising from the Scheme.

1.2 Background and Relevant Representations

- 1.2.1 The Applicant notes the Examining Authority's request for further information in relation to white-clawed crayfish (*Austropotamobius pallipes*), including the concerns raised in relevant representations by South Norfolk District Council **[RR-1795]**, Norfolk Wildlife Trust **[RR-1453]** and Block East Pye **[RR-0200]**.

1.3 Applicants Position

- 1.3.1 A habitat suitability survey for white-clawed crayfish was undertaken, with the findings reported in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** and **ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]**. The submitted assessment identified no records of white-clawed crayfish within a 2 km search radius of the Order Limits within the last 10 years, and no holes, burrows, exuviae, carcasses or other field signs attributable to crayfish were recorded during the surveys undertaken. **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** identifies that a single record exists approximately 6 km downstream on the River Tas. The Applicant has subsequently considered the information identified by Block East Pye concerning white-clawed crayfish records attributed to Norfolk Rivers Trust at Saxlingham Thorpe on the River Tas. Accordingly, the Applicant does not rely on the absence of records identified through the original desk study as evidence that white-clawed crayfish are absent from the wider River Tas catchment. For the purposes of this position statement, potential presence within the River Tas and other hydrologically connected suitable habitat is therefore considered on a precautionary basis.
- 1.3.2 The low habitat suitability conclusion was based on the characteristics of the surveyed watercourses and ditches, rather than solely on the absence of desk study records or field signs. **ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]** identifies that habitats within the

surveyed reaches were generally unsuitable or of low suitability due to a combination of fine sediment deposition, limited stable coarse substrate, limited submerged refugia, limited suitable undercut banks, insufficient water depth, poor hydrological conditions and the episodic or ephemeral nature of parts of the ditch network. In particular, some ditch features were recorded as comprising long dry sections and exhibiting evidence of terrestrial succession, indicating that these features are unlikely to provide the permanent or stable aquatic conditions typically required by white-clawed crayfish.

2 Applicant Assessment and Position

2.1 Habitat Suitability and Survey Evidence

- 2.1.1 The Applicant acknowledges that **ES Volume 3, Appendix 8.9 – Aquatic Habitat Assessment Report [APP-160]** identified that surveys were undertaken during a period of unusually dry conditions and that, as a result, the wetted extent, depth and in-channel habitat availability observed may under-represent typical conditions, particularly for ephemeral headwaters and field ditches. This limitation was recognised within the submitted assessment. However, the Applicant does not consider that this limitation materially affects the validity of the habitat suitability assessment for white-clawed crayfish. This is because the principal habitat features required by the species, including stable coarse substrates, cobbles, boulders, submerged or exposed root systems, persistent undercut banks, crevices and other stable refugia, would still have been present and identifiable during the survey, even where water levels were low or where individual ditch sections were dry at the time of survey. These physical habitat features do not disappear as a result of low-flow conditions and would have been recorded and considered on a precautionary basis had they been present within the surveyed reaches.
- 2.1.2 Accordingly, the Applicant considers that the survey conditions did not prevent the identification of key white-clawed crayfish habitat features. The principal constraints identified were not limited to the presence or absence of water at the time of survey, but also included the lack of stable submerged or seasonally submerged refugia, limited structural complexity, fine sediment-dominated substrates, limited suitable bank features, poor hydrological permanence and evidence of terrestrial succession within parts of the ditch network. These characteristics indicate that many of the surveyed ditches are unlikely to provide suitable, stable or persistent habitat for white-clawed crayfish, even where they may become temporarily wetted during or following periods of rainfall.
- 2.1.3 The Applicant has also considered the existing survey evidence against Natural England's standing advice, including the "what to survey for" section. The standing advice identifies targeted techniques that can include manual searching, hand-netting, night searching by torch, licensed artificial refuge trapping where appropriate, and environmental DNA (eDNA) surveys. The aquatic habitat surveys undertaken for the Scheme were habitat suitability assessments and were not targeted presence/absence surveys using these techniques. They nevertheless recorded the habitat characteristics relevant to white-clawed crayfish, including substrate, bank and refuge features, hydrological permanence and observable field signs, and therefore provide relevant evidence for assessing habitat suitability and potential impact pathways.

- 2.1.4 Natural England's standing advice also identifies the need for survey where distribution and historical records suggest white-clawed crayfish may be present. The Applicant has therefore specifically considered whether further targeted survey is required in light of the information concerning the wider River Tas catchment. As potential presence within the River Tas and other hydrologically connected suitable habitat is considered on a precautionary basis, the assessment does not depend upon demonstrating absence from these sensitive receptors. The relevant consideration is whether the Scheme provides a credible pathway for harm and whether that pathway has been adequately avoided or controlled. In this context, further confirmation of presence or absence would not materially alter the assessment of effects or the avoidance and mitigation incorporated into the Scheme.

2.2 Precautionary Assessment and Embedded Mitigation

- 2.2.1 The Applicant also recognises that the River Tas and Hempnall Beck are the principal sensitive aquatic receptors relevant to this matter. These watercourses are hydrologically connected to the wider Yare/Tas catchment, within which white-clawed crayfish are known to occur. The potential for the species to be present within these watercourses or in hydrologically connected downstream habitat has therefore been considered on a precautionary basis. Both the River Tas and Hempnall Beck have been identified as sensitive aquatic receptors and designated as Avoidance Areas within the Scheme design. These avoidance measures are directly relevant to the potential impact pathways for white-clawed crayfish should the species be present.
- 2.2.2 The Scheme incorporates embedded avoidance and mitigation measures which are relevant to the potential impact pathways for white-clawed crayfish. Measures to control pollution to watercourses are set out in the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]** and **Outline DEMP [APP-198]**. The Outline CEMP confirms that design buffers and Avoidance Areas are incorporated into the Scheme design to reduce impacts as far as practicable, and that the Outline Protected Species Mitigation Strategy sets out mitigation measures and approaches to avoid impacts on protected species and associated habitats through killing, injury, damage, pollution and disturbance during the construction phase.
- 2.2.3 **Design Principles, Parameters and Commitments [APP-213]** sets out minimum offset distances within the design for main rivers, watercourses and ditches. **Outline Cable Route Construction Statement [APP-216]** confirms that where cables cross main rivers, the Applicant is committed to a minimum cable depth of 5 m below the surveyed bed of main rivers. Trenchless crossing techniques will also be employed at relevant sensitive watercourse crossings, including the River Tas and Hempnall Beck Avoidance Areas, with launch and reception pits located outside of the Avoidance Areas. These measures avoid direct disturbance to the beds and banks of these sensitive watercourses and reduce the potential for indirect

downstream effects on aquatic habitats and species, including white-clawed crayfish should they be present.

- 2.2.4 Method Statement 7: Precautionary Horizontal Directional Drilling (HDD) Methodology, submitted as a part of **ES Volume 3, Appendix 8.10 Outline Protected Species Mitigation Strategy [APP-161]**, includes protection measures to avoid or minimise effects to watercourses and associated species. These precautions, together with the pollution prevention, sediment control, biosecurity, stand-off and trenchless crossing measures secured through the submitted control documents, are relevant to the impact pathways identified in Natural England's standing advice, including disease spread from poor biosecurity practice, habitat loss or modification, obstruction of movement, and reductions in water quality or quantity associated with altered flow, increased siltation, reduced oxygenation or pollution incidents.
- 2.2.5 The mitigation hierarchy has therefore been applied with avoidance as the primary mechanism for the most sensitive aquatic receptors. As direct disturbance to the River Tas and Hempnall Beck is avoided, and no loss of confirmed white-clawed crayfish habitat has been identified, species-specific compensation is not currently considered necessary. Should the detailed construction methodology change such that direct effects on suitable or occupied white-clawed crayfish habitat could occur, the need for further survey, additional mitigation or compensation and any necessary licensing would be reviewed before those works are undertaken.
- 2.2.6 The Applicant has also considered the need for site monitoring and management. The principal requirements relevant to the Scheme are to maintain water quality and flow, protect aquatic habitat and minimise the risk of introducing or spreading non-native crayfish or crayfish plague through appropriate biosecurity. These matters are addressed through the watercourse protection, pollution prevention, sediment control, biosecurity and construction management measures secured within the **Outline CEMP [APP-196]**, **Outline OEMP [APP-197]**, **Outline DEMP [APP-198]** and **Outline Protected Species Mitigation Strategy [APP-161]**, together with the Scheme's environmental management, inspection and ecological supervision arrangements during construction. Given that direct effects on the River Tas and Hempnall Beck are avoided and no loss of confirmed white-clawed crayfish habitat is proposed, species-specific post-construction population monitoring is not currently considered proportionate. This position would be reviewed if subsequent information identified white-clawed crayfish within a directly affected reach, if the detailed construction methodology changed so that a new impact pathway arose, or if construction monitoring indicated that the secured measures were not operating as intended.

2.3 Position on Further Survey Requirements

- 2.3.1 No further white-clawed crayfish surveys have been completed in 2026 and no additional targeted surveys are currently proposed within the remaining

July to September survey window. The ongoing drought conditions are understood to have resulted in hydrological conditions that are less representative than those recorded during the original aquatic habitat surveys, such that repeat habitat assessment at this time would be unlikely to provide a more representative assessment of typical wetted extent, depth and in-channel habitat availability. However, the Applicant's position does not rely solely on the prevailing drought conditions. As potential white-clawed crayfish presence within the River Tas and other hydrologically connected suitable habitat is considered on a precautionary basis, and the relevant impact pathways are avoided or controlled through the Scheme design and secured mitigation, additional presence/absence survey would not materially alter the assessment of effects or the mitigation required. The Applicant therefore considers that additional targeted survey is not required to inform the assessment.

- 2.3.2 The Applicant remains confident in this position for two principal reasons. First, the existing evidence base indicates that the ditch network within the Order Limits is of low ecological quality for white-clawed crayfish. This conclusion is not dependent solely on the dry-weather conditions recorded during the survey, but on the absence of key habitat features that would have remained identifiable irrespective of water level, including stable coarse substrates, persistent undercut banks, exposed or submerged root systems and other suitable refugia. Habitat suitability is further limited by fine sediment-dominated substrates, limited stable refugia, limited suitable bank features, poor hydrological permanence and evidence of terrestrial succession within many of the ditches. These factors indicate that the majority of the ditch network is unlikely to provide suitable, stable or persistent habitat for white-clawed crayfish, even where temporarily wetted following rainfall events. Secondly, the watercourses where potential impact pathways would be most realistic, namely the River Tas and Hempnall Beck, have been identified as sensitive aquatic receptors and designated as Avoidance Areas. The avoidance measures and mitigation secured for these watercourses, including trenchless crossing techniques, stand-off measures, launch and reception pits located outside the sensitive watercourse corridors, pollution prevention, sediment control and biosecurity measures, would avoid or minimise potential impacts to white-clawed crayfish should the species be present within these watercourses or hydrologically connected downstream habitats.
- 2.3.3 On the basis of the submitted assessment, the Applicant remains satisfied that the suitability of habitats within the Order Limits for white-clawed crayfish is low. This conclusion is supported by the absence of field signs during survey, the limited suitability of the habitats recorded, the absence of key habitat features that would have remained identifiable during low-flow or dry conditions, and the embedded avoidance and mitigation measures secured through the Scheme design. The conclusion does not depend upon assuming that white-clawed crayfish are absent from the wider River Tas catchment. In particular, the designation of the River Tas and Hempnall Beck as Avoidance Areas, together with the use of trenchless crossing techniques, stand-off measures, pollution prevention, sediment control and

biosecurity measures, provides a robust basis for concluding that significant effects on white-clawed crayfish are not anticipated, including in the event that the species is present within these hydrologically connected sensitive aquatic receptors.

3 Conclusion

- 3.1.1 Should further, robust and site-specific evidence become available that materially changes the understanding of habitat suitability or potential white-clawed crayfish presence within watercourses affected by the Scheme, the Applicant would review the relevant construction methodology and mitigation requirements before works affecting those locations are undertaken. Such evidence would need to be capable of materially altering the conclusions of the submitted assessment, for example verified recent records or targeted survey results confirming white-clawed crayfish within or immediately adjacent to an affected reach, or site-specific evidence of suitable, stable and persistent refuge habitat, such as coarse substrates, exposed root systems, persistent undercut banks or other stable refugia, within a watercourse where a credible impact pathway from the Scheme exists. This may include additional avoidance measures, method statement controls, timing restrictions, enhanced biosecurity, sediment and pollution control, and any necessary protected species licensing or Environment Agency permissions, where required. Natural England's standing advice confirms that developers may need a licence for activities affecting white-clawed crayfish and may need Environment Agency permission to trap crayfish as part of a development proposal.
- 3.1.2 On this basis, the Applicant maintains that significant effects on white-clawed crayfish are not anticipated. Having regard to the Examining Authority's request, Natural England's standing advice, the existing habitat evidence, the information concerning white-clawed crayfish within the wider River Tas catchment, the recognised limitation associated with the previous dry-weather survey conditions, the current drought conditions and the avoidance and mitigation secured for the River Tas and Hempnall Beck, the Applicant considers that further targeted survey is not necessary to reach a robust assessment of the likely effects of the Scheme. The Applicant considers that the proposed approach provides a robust and proportionate basis for the Examining Authority to consider potential effects on white-clawed crayfish.