



**East Pye Solar
Environmental Statement (ES)
Volume 3: Appendix 8.10 - Outline Protected Species
Mitigation Strategy**

**Revision 2
October 2026**

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Schedule of Changes

Reference	Pages	Description of Changes	Reason for Revision
East Pye Solar Environmental Statement, Volume 3: Appendix 8.10 - Outline Protected Species Mitigation Strategy (Revision 2)	21-23	Additional information added to appropriate mitigation/avoidance measures to be adopted for temporary grassland impacts.	Further clarity provided following Relevant Representations responses received.
	26-29	Updates following the results of further great-crested newt surveys undertaken in 2026	Updates following from 2026 great crested newt survey results
	45	Updates to Figure 1: Great Crested Newt Mitigation Strategy	

Contents

1	Introduction.....	1
1.1	Purpose of this document.....	1
1.2	Responsible Personnel & Lines of Communication	2
1.3	Site Manager(s).....	2
1.4	Ecological Clerk of Works	2
1.5	Contact Details	3
1.6	Designated Sites	3
1.7	Habitats	5
1.8	Species and Species Groups	5
2	Method Statement 1: Toolbox Talks	6
2.1	Objectives	6
3	Method Statement 2: Installation of Biodiversity Protection (Buffer) Fencing	7
3.1	Objectives	7
3.2	Toolbox Talk	7
3.3	Solar PV and BESS.....	7
3.4	Cable Route Corridor.....	9
4	Method Statement 3: Pollution Prevention Measures	10
4.1	Objectives	10
4.2	Toolbox Talk	10
4.3	Working During Prolonged Periods of Wet Weather	11
4.4	Working During Prolonged Periods of Dry Weather.....	11
4.5	Minimisation of Water and Sediment Runoff.....	11
4.6	Use and Storage of Chemicals, Fuels and Oils	12
4.7	Compliance with Guidance for Pollution Prevention	12
5	Method Statement 4: Construction Phase Lighting.....	13
5.1	Objectives	13
5.2	Ecologically Sensitive Lighting Strategy	13
6	Method Statement 5: Permanent Habitat Removal (Solar PV Sites/BEES/Substations and other permanent Infrastructure) - including Avoidance of Impacts on Protected Species	15
6.1	Objectives	15
6.2	General Precautionary Approach to Habitat Removal Works	15
6.3	Reptiles and (widespread) Amphibians	16
6.4	Pre-commencement Nesting Bird Checks	17
6.5	Tree Inspections for Roosting Bats	17
6.6	Badgers	19
6.7	Riparian Mammals.....	19

6.8	Other Priority Mammals (Polecat, Hedgehog, Brown Hare and Harvest Mouse)	20
6.9	Invasive Non-Native Species	20
7	Method Statement 6: Temporary Habitat Removal and Reinstatement (Cable Route Corridor) - including Avoidance of Impacts on Protected Species	21
7.1	Objectives	21
7.2	Grassland	21
7.3	Hedgerows	23
7.4	Ditches	23
8	Method Statement 7: Precautionary Horizontal Directional Drilling (HDD) Methodology	24
8.1	Objectives	24
8.2	Precautionary Approach to HDD Works	24
9	Method Statement 8: Specific Measures for Avoidance of Impacts on Great Crested Newts	25
9.1	Objectives	25
9.2	Mitigation Approach	25
9.3	Biodiversity Protection Fencing (BPF)	26
9.4	Great Crested Newt Working Areas	27
9.5	Toolbox Talk	28
9.6	Precautionary Approach to Works within Great Crested Newt Working Area	28
10	Method Statement 9: Avoidance of Impacts on Skylark (and other ground nesting birds)	31
10.1	Objectives	31
10.2	Proposed Mitigation Approach	31
10.3	Pre-Commencement Nesting Bird Checks	35
11	Method Statement 10: Specific Measures for Avoidance of Impacts on Badgers	36
11.1	Objectives	36
11.2	Pre-commencement Survey	36
11.3	Toolbox Talk	37
11.4	Potential Licensed Settle Closures	37
11.5	Precautionary Approach to Excavations Left Overnight	38
12	Method Statement 11: Specific Measures for Invasive Non-Native Species	39
12.1	Objectives	39
12.2	Pre-Commencement INNS Search	39
12.3	Toolbox Talks	40
12.4	Biosecurity Measures	40
12.5	Precautionary Approach to Works and INNS Management	41
13	Method Statement 12 Construction-Phase Monitoring	42
13.1	Objectives	42
13.2	Monitoring	42

13.3	Reporting	43
14	Figures	44

Figures

Figure 1: Great Crested Newt Mitigation Strategy	44
Figure 2: Skylark Mitigation Strategy	44
Figure 3: Invasive Non-Native Species Recorded Locations (2024 and 2025)	44

Tables

Table 1-1 : Contact Details	3
Table 1-2: Designated Sites for Nature Conservation within 500m	4
Table 1-3. Species known to occur, or possibly occur, within the Order Limits	5
Table 10-1. Contributing Data Used to Assess Skylark Mitigation Approach	34

1 Introduction

1.1 Purpose of this document

- 1.1.1 This Outline Protected Species Mitigation Strategy (OPSMS) is prepared in relation to an application for a Development Consent Order (DCO) (the 'DCO Application') for East Pye Solar (the 'Scheme'), pursuant to the Planning Act 2008 (PA 2008), on land located south of Norwich and north of Harleston (the Order Limits), see further details below. The Scheme comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station with a total capacity exceeding 100 megawatts (MW) and associated development including a Battery Energy Storage System (BESS), up to three 132kV Project Substations and up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation. A description of the Scheme can be found in **Environmental Statement (ES) Volume 1, Chapter 4 The Scheme [EN0110014/APP/6.1.4]**.
- 1.1.2 This OPSMS sets out the embedded ecological mitigation measures to be adopted during the Construction Phase of the Scheme. The OPSMS specifically deals with the protection of species afforded legislative protection during the Construction Phase of the Scheme (this also includes legally controlled invasive non-native species).
- 1.1.3 Information relating to the management of other environmental issues such as traffic movements, compound locations, site welfare, working hours, services and noise have been provided separately within the **Outline Construction Environmental Management Plan [EN0110014/APP/7.1]** ('Outline CEMP') which should be read alongside this document.
- 1.1.4 As this is an Outline PSMS, a final, more detailed version, yet still substantially in accordance with the measures and principles set out within this document, will be submitted to and approved by the relevant planning authorities pursuant to a Requirement in the Development Consent Order (DCO) prior to the construction of the Scheme.
- 1.1.5 The oPSMS has been informed by extensive baseline ecological surveys and desk study undertaken between May 2024 and January 2026 and addresses the needs for ecological protection and mitigation within the construction phase as identified by the impact assessment of **ES Volume 1, Chapter 8 Ecology and Biodiversity [EN0110014/APP/6.1.8]**.
- 1.1.6 The purpose of this OPSMS is to:
- Identify known risks to protected species, and to preserve the integrity and/or the function of habitats that support those species during the construction phase;

- Enable the implementation of the mitigation outlined in, **ES Volume 1, Chapter 8 Ecology and Biodiversity [EN0110014/APP/6.1.8].;**
 - Identify ecologically sensitive areas and indicate where protective measures (buffers/fencing) are required;
 - Clearly set out when and where ecological supervision will be required; and
 - Identify roles and responsibilities for undertaking this protective/mitigation work during the construction phase.
- 1.1.7 This OPSMS follows the guidelines set out within the *Biodiversity – Code of Practice for Planning and Development* (British Standard, 42020:2013).
- 1.1.8 A separate **Outline Landscape and Ecological Management Plan (OLEMP) [EN0110014/APP/7.4]** has also been prepared for the Scheme, which covers the continued protection, management and enhancement of the ecological receptors, as well as outline habitat creation and management prescriptions.

1.2 Responsible Personnel & Lines of Communication

- 1.2.1 As this document is an Outline document, roles and responsibilities are not final at this stage. Detailed responsibilities will be set out in the final PSMS, secured through DCO Requirement.

1.3 Site Manager(s)

- 1.3.1 The Applicant will be responsible for ensuring that a Site Manager (or Site Managers) is appointed for the construction installation teams for the Scheme and that this document has been provided to them. It will be the responsibility of the Site Manager(s) to ensure adequate communication of the applicable prescriptions set out within the final PSMS to construction staff and ensure sufficient liaison and forward planning with the Ecological Clerk of Works (ECoW).

1.4 Ecological Clerk of Works

- 1.4.1 An ECoW will be appointed to all construction teams and will comprise a suitably qualified ecologist (and potentially assistants) all with at least five years' relevant experience. The ECoW(s) will assist and advise the Applicant and the Site Manager(s) in their adherence to the requirements of the final PSMS.
- 1.4.2 Typically, a permanent on-site presence is not required. Instead, an appropriately qualified ecologist will attend at pre-arranged and timetabled

work stages as set out in this document, as well as being available via an ‘on-call’ basis throughout the construction phase. This will rely on adequate regular and ad-hoc communication between the Site Manager(s) and the ECoW(s). This will enable any rearranged or changed timetables to be accommodated, as well as a prompt response for dealing with any potential habitat or protected species protection and legal compliance issues that could arise during the course of construction.

- 1.4.3 The ECoW(s) will be contacted as early as possible in the unlikely event that any activities on site contravene the measures prescribed in the PSMS, for instance, should there be any unforeseen, but essential requirement to enter any of the Biodiversity Protection Zones. The ECoW will be consulted prior any such action being carried out unless in emergency situations.

1.5 Contact Details

- 1.5.1 **Table 1-1** provides outline contact details, these will be revisited and updated within the PSMS.

Table 1-1 : Contact Details

Personnel Contact /	Company	Primary Contact(s)	Address	Contact Details
Main Contractor	TBC	TBC	TBC	TBC
ECoW	TBC	TBC	TBC	TBC
Wildlife Rescue Centres	Hallswood Animal Sanctuary		Shortthorn Road, Stratton Strawless, Norfolk NR10 5NU	hasshoponline@gmail.com
	Norfolk Wildlife Rescue		Magpie Road, Norwich, Norfolk, NR3 1JH	07932 844524
	RSPCA: East Winch Wildlife Centre		Gayton Road, East Winch, King's Lynn, Norfolk, PE32 1LG	0300 123 0709 https://www.rspca.org.uk/local/east-winch-wildlife-centre/aboutus/contactus
Pollution Incident Contact	Environment Agency	TBC	TBC	0800 807060

1.6 Designated Sites

- 1.6.1 **Table 1-2** provides the designated sites for nature conservation which occur within or in close proximity (within 500m) to the Order Limits (as discussed in **ES Volume1, Chapter 8 Ecology and Biodiversity [EN0110014/APP/6.1.8]**). Whilst not necessarily designated for the species discussed within this document, their protection is considered important for

the avoidance of impacts upon the species covered within this document, and therefore are of principal concern within this document.

Table 1-2: Designated Sites for Nature Conservation within 500m

Designated Site Name	Distance & Direction from the Closest Sub-Site	Distance & Direction from the Closest CRC
Fritton Grange Meadows CWS	adjacent to Sub-Site 7B	Partially located within CRC7
Lower Spring Wood CWS	0.85km east of Sub-Site 7K	Partially located within CRC9
Bussey's Loke RNR	Partially located within Sub-Site 7G	0.3km SE of CRC10
Market Lane RNR	Partially located within Sub-Site 8A	0.1km E of CRC10
Parkers Lane RNR (Area 1)	1.5km south of Sub-Site 4B	Partially located within CRC4
Parkers Lane RNR (Area 2)	2km south of Sub-Site 4B	Partially located within CRC4
Shotesham-Woodton Hornbeam Woods SSSI	SSSI Unit 1: 0.14km W of Sub-Site 8B SSSI Unit 2: adjacent to Sub-Sites 7F & 7G SSSI Unit 3: adjacent to Sub-Site 7H SSSI Unit 4: 0.55km S of Sub-Site 7K	SSSI Unit 1: 0.45km NW of CRC 10 SSSI Unit 2: 0.10km W of CRC 10 SSSI Unit 3: 0.15km N of CRC8 SSSI Unit 4: 0.31km S of CRC8
Spring Wood, Hempnall CWS	Adjacent to Site 3	0.3km E of CRC6
Saxlingham Grove CWS	Adjacent to Sub-Site 7F	0.2km W of CRC10
Pope's Wood CWS	Adjacent to Sub-Site 7C	0.02km E of CRC11
Lodge Road RNR	Adjacent to Sub-site 2B	Adjacent to CRC2
D'Oyly's Grove CWS	Adjacent to Sub-Site 7C	0.3km S of CRC12
Fylands Road RNR	Adjacent to Sub-Sites 7I & 7J	0.4km CRC8
Woodton Road RNR (24)	Adjacent Sub-Site 7K	0.9km N of CRC08
Woodton Road RNR (16)	0.13km N Sub-Site 7k	0.9km N of CRC08
The Krons Meadows CWS	0.2km SE of Sub-Site 7B	0.07km NE from CRC7
Tyrrel's Wood and New Plantation CWS	3.3km S of Sub-Site 5A.	0.1km E of CRC4
Beckett's Wood CWS	0.6km SE of Sub-Site 7L	0.1km S of CRC9
Nunn's Grove CWS	0.5km SW of Sub-Site 9	0.1km S CRC13
Pulham Market Big Wood SSSI	1.20km E of Sub-Site 2C	0.1km E of CRC4
Brooke Wood CWS	0.1km W of Site 9	0.2km N of CRC13
Hedenham Wood SSSI	0.14km E of Sub-Site 10B	0.50km S of CRC14
Pye's Covert & Privett Plantation CWS	0.2km E of Sub-Site 8B	0.2km N of CRC13
Backwood Lane RNR	0.6km W of Site 9	0.2km N of CRC13
Tasburgh Red Poll Meadow CWS	0.3km N of Sub-Site 4A	1.4km W of CRC11
Wood Green CWS	2.3km south of Sub-Site 5A	0.4km east of CRC4
Round Wood CWS	0.9km west of Sub-Site 10C	0.4km N of CRC9
Rhees Green RNR	0.6km south of Sub-Site 4B	0.4km W of CRC4
Park Plantation CWS	0.4km E of Site 9	1.3km E of CRC13
Woodton Road RNR (25)	0.4km N of Sub-Site 7K	0.9km S of CRC13

Designated Site Name	Distance & Direction from the Closest Sub-Site	Distance & Direction from the Closest CRC
Spring Wood CWS	0.83km W of Sub-Site 7L	0.42km north of CRC9
Brooke Road RNR	0.5km NW of Sub-Site 8B	0.9km NW of CRC13
Pecks Plantation CWS	0.5km W of Sub-Site 4A	2.1km NW of CRC4

1.7 Habitats

1.7.1 The following habitats occur within the Order Limits (or immediately bordering) and are of principal concern within this document. All Method Statements (whether directly or indirectly) refer to the protection of these broad habitats due to their ability to support protected species:

- Woodland (including ancient woodland);
- Scrub;
- Hedgerows and Trees;
- Neutral Grassland (including arable field margins);
- Lowland fen;
- Ditches and Watercourses; and
- Ponds.

1.8 Species and Species Groups

1.8.1 The species within **Table 1-3** occur, or may occur, within the Order Limits, and are the focus of this document.

Table 1-3. Species known to occur, or possibly occur, within the Order Limits

Species of Concern Within This Document	Associated Method Statement(s)
Invertebrates	2, 3, 4, 5, 6 & 7
Widespread reptiles and amphibians	2, 3, 5 & 6
Great crested newts <i>Triturus cristatus</i>	2 & 8
Breeding birds (including ground nesting birds of open habitats)	2, 5, 6 & 9
Bats	2, 3, 4, 5, & 6
Badgers <i>Meles meles</i>	2, 4 & 10
Riparian Mammals (Otters <i>Lutra lutra</i> and Water Voles <i>Arvicola amphibius</i>)	2, 3, 4, 5, 6 & 7
Other priority mammals (brown hares <i>Lepus europaeus</i> , harvest mice <i>Micromys minutus</i> , hedgehog <i>Erinaceus europaeus</i> , and polecat <i>Mustela putorius</i>)	2, 4, 5 & 6
Freshwater fish and White-clawed crayfish <i>Austropotamobius pallipes</i>	2, 3, & 7
Invasive non-native species	2 & 11

2 Method Statement 1: Toolbox Talks

2.1 Objectives

- 2.1.1 Toolbox Talks are important for communicating the location and nature of the legally protected and sensitive ecological features that are present within the Order Limits to all site staff and visitors. Toolbox Talks also set out the responsibilities of all site staff in avoiding and minimising harm to protected species and habitats and will outline the relevant ecological legislation.
- 2.1.2 Prior to the commencement of works at any of the Scheme elements, a toolbox talk will be provided by the ECoW to the Site Environmental Manager, Site Manager(s) and contractors (either in-person or online). The toolbox talk will include details of the PSMS and will highlight the location and sensitivity of the various ecological features present within each area. The talk will establish the role of the ECoW and site personnel during works, and what to do if protected species/ecological constraints are found during works.
- 2.1.3 In the event a change in Site Management personnel occurs during construction or a pause in works of a period of more than 30 consecutive days occurs, a toolbox talk will need to be provided again by the appointed ECoW. The Site Manager(s) will inform the ECoW of any forthcoming management changes or breaks in the construction programme. The Site Manager(s) will be responsible for relaying information within the toolbox talks to all subsequent site staff during their initial site inductions; this can be in the form of a recorded presentation delivered from the ECoW.
- 2.1.4 The ECoW will provide the Site Manager(s) with visual materials and mapping which can be used to illustrate the whereabouts and nature of ecological features within site inductions.
- 2.1.5 The various Method Statements in this document contain further information to be included within toolbox talks specific to certain species or operations.

3 Method Statement 2: Installation of Biodiversity Protection (Buffer) Fencing

3.1 Objectives

- 3.1.1 The majority of the Scheme's valuable ecological features are contained within field boundaries. As such, temporary Biodiversity Protection Fencing (BPF) will be installed at the onset of the construction phase to prevent damage and degradation to these features. The exact location of and need for fencing will be influenced by specific ecological sensitivities and proposed activities within that location and determined on site by the ECoW.
- 3.1.2 Installation of BPF contributes to the protection of all designated sites, important habitats and protected species listed in **Sections 0.6 - 0.8** of this document.

3.2 Toolbox Talk

- 3.2.1 Prior to the commencement of works within the Order Limits, a toolbox talk will be provided by the ECoW to the Site Manager and contractors. The toolbox talk will include details of the PSMS and the requirements for BPF contained below, highlighting ecological features within each area. The talk will establish the role of the ECoW and site personnel during works, and what to do if protected species/ecological constraints are found during works.
- 3.2.2 In the event a change in Site Management personnel occurs during construction or a pause in works of a period of more than 30 consecutive days occurs, the toolbox talk will need to be provided again by the appointed ECoW. The Site Manager will be responsible for relaying information within the toolbox talk to all subsequent site staff during their initial site inductions.

3.3 Solar PV and BESS

- 3.3.1 The design of the Scheme is such that buffer zones have been incorporated into the layout of the PV modules, access tracks, inverters, substations and battery energy storage infrastructure. The buffer widths correspond to the ecological value of each boundary and/or its sensitivity to potential impacts. Therefore, construction-phase BPF should be installed in line with these buffer extents.
- 3.3.2 BPF will be installed as a priority during the mobilisation and preparation tasks in the construction phase. This will likely comprise of 'Heras'-style fencing (or other similarly temporary fencing), in the case of the 'external' or perimeter scheme boundaries, the operational security fence would serve the dual purposes of construction-phase protection and ongoing security. Security

- fencing will comprise a maximum of 2.5m tall deer-proof fencing installed on wooden posts.
- 3.3.3 BPF will also be used to protect all individual in-field mature trees as set out in **ES Volume 3, Appendix 7.10 Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10]**. Tree protection fencing will be installed in accordance with British Standard 5837:2012 Trees in relation to design, demolition and construction.
- 3.3.4 The location of all BPF will be agreed and confirmed between the ECoW and Site Manager(s) prior to commencement of installation to ensure clarity on all buffer zone widths, access and fencing specification requirements. This will minimise the chance of any unnecessary and avoidable call-outs of the ECoW being required during the installation.
- 3.3.5 All installed BPF will be inspected by an ECoW during and/or on completion of installation to ensure it complies with the correct specification and is installed in the correct locations.
- 3.3.6 The fencing will be subject to regular checks by the ECoW as per Method Statement 12; however, it will be the responsibility of the Site Manager(s) to ensure the fence is appropriately maintained throughout the construction phase.
- 3.3.7 During construction, no Site personnel or machinery shall enter the Buffer Zones by crossing the BPF and no equipment will be stored therein. The only exceptions will be where access for essential/unavoidable operations have been agreed in advance with the ECoW; for instance to facilitate habitat enhancement and measures for the benefit of protected species and wider biodiversity.
- 3.3.8 For reference, the BPF will be installed according to the following criteria set out in the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** report which accompanies the DCO submission which were used to determine buffer zone widths:
- 10m from hedgerows/ditches/watercourses
 - 15m from individual trees, groups of trees and non-ancient woodland;
 - 30m minimum from ancient woodland, from ponds with a negative great crested newt (GCN) survey result, SSSI boundaries, CWS, and badger setts;
 - 50m from ponds with confirmed evidence of GCN, or where the presence of GCN has been assumed due to inconclusive results/no survey access;

- 3.3.9 Other, bespoke buffers around RNR's, bat roosts, and the nesting sites of Schedule 1 birds will be implemented on a case-by-case basis, taking into account the specific species' requirements.

3.4 Cable Route Corridor

- 3.4.1 The cable installation work involves the open cutting of a trench to receive cable ducts and jointing bays through which cables are pulled into place. In order to facilitate this, a temporary haul route will be implemented alongside the cable route, together with intermittent site compounds and set-down areas and the opening of temporary accesses from nearby roadways.
- 3.4.2 Where certain physical obstacles are present, or features of high ecological importance are present, trenchless techniques such as Horizontal Directional Drilling (HDD) will be utilised to avoid damage. A schedule of crossings has been produced to show which features will be crossed through trenchless techniques or HDD (see **Outline Cable Route Construction Statement [EN0110014/APP/7.21]**).
- 3.4.3 In terms of BPF, it is necessary to minimise temporary habitat impacts as far as possible, so that only the minimum length of habitat is removed at boundary crossings due to receive open cut trenches. Therefore, where open cut trenching/haul routes are involved, gaps through boundaries/ habitats will only measure up to 10m wide, thereby, minimising unnecessary temporary impacts.
- 3.4.4 At boundary crossings fencing will be installed comprising two short lengths of Heras-style fencing (each approximately 2-4 panels, depending on the presence/width of boundary habitats as directed by the ECoW) installed at right angles on either side of the boundary feature to stop any encroachment beyond the 10m gap width.
- 3.4.5 The location of all BPF on the cable route will be agreed and confirmed between the ECoW and Site Manager(s) prior to commencement of installation at each crossing to ensure clarity on all fencing specification requirements.
- 3.4.6 All installed BPF will be inspected by an ECoW during and/or on completion of installation to ensure it complies with the correct specification and is installed in the correct locations. It will be the responsibility of the Site Manager(s) to ensure the fence is appropriately maintained throughout the construction phase.
- 3.4.7 During construction, no site personnel or machinery shall cross beyond the BPF nor shall any equipment be stored in there.
- 3.4.8 Following the cessation of all temporary works in a specific area of the CRC, all habitats within the boundary crossings will be reinstated to their original condition, in adherence to ECoW direction.

4 Method Statement 3: Pollution Prevention Measures

4.1 Objectives

- 4.1.1 The majority of the Scheme's valuable ecological features are contained within field boundaries, particularly hedgerows, trees, ditches and watercourses. Other habitats are also located within the Order Limits, including ponds, woodland, grassland field margins and scrub. Notably, lowland fen habitat (classified as irreplaceable habitat) is located within CRC7.
- 4.1.2 Additionally, two CWS, and four RNR's are partially located within the Order Limits (see **Table 1-2**), also three RNR, 4 CWS and Shotesham-Woodton Hornbeam Woods SSSI, and areas of ancient woodland are located adjacent to the Order Limits.
- 4.1.3 Species groups at particular risk from pollution events are freshwater fish, terrestrial and aquatic invertebrates, amphibians, small mammals, and riparian mammals.
- 4.1.4 Potential pollution events include the release of chemicals (including oils, fuels and cleaning agents), sediments (including mud, soil and silt) and dust (especially during dry weather). These pollutants can be released either in their own right or through excessive surface water runoff (e.g. during periods of prolonged rain, flooding or disruption of water courses/pipework).
- 4.1.5 The installation of BPF as set out in Method Statement 2 (MS2) is considered to significantly reduce the likelihood of pollution events occurring through implementing a suitably wide offset between construction activities and sensitive habitats. However, the following additional pollution prevention measures will be adopted to aid further risk reduction.
- 4.1.6 This Method Statement should be read in conjunction with the **Outline CEMP [EN0110014/APP/7.1]** produced for the Scheme which details general (i.e. not ecology-specific) pollution protection measures.

4.2 Toolbox Talk

- 4.2.1 Prior to the commencement of works at any of the Solar PV/BESS Sites, or CRC installation, a toolbox talk will be provided by the ECoW to the Site Manager and contractors. The toolbox talk will include details of the PSMS, the sensitivity of ecological features to impacts from pollution, and the requirements for prevention measures contained below. Highly sensitive ecological habitats will be discussed and the need for any proportionate risk reduction measures. The talk will establish the role of the ECoW and site personnel during works, and what to do if protected species/ecological constraints are found during works.

- 4.2.2 In the event a change in Site Management personnel occurs during construction or a pause in works of a period of more than 30 consecutive days occurs, the toolbox talk will need to be provided again by the appointed ECoW. The Site Manager(s) will be responsible for relaying information within the toolbox talk to all subsequent site staff during their initial site inductions.

4.3 Working During Prolonged Periods of Wet Weather

- 4.3.1 Work during periods of prolonged wet weather shall be avoided wherever possible to avoid churning of soils and the release of mud and sediments and/or excessive surface water runoff. The ECoW should be consulted should heavy rain on at least three consecutive days be forecast or occur in order to determine whether works should pause or be relocated to less sensitive areas, depending on construction progress and the location/ proximity of particular sensitive ecological features.
- 4.3.2 The **Outline CEMP [EN0110014/APP/7.1]** contains several measures which specifically deal with the mitigation of potential contamination of watercourses by surface runoff.

4.4 Working During Prolonged Periods of Dry Weather

- 4.4.1 Working during extended dry periods risks dust deposition onto retained sensitive ecological features, including those beyond the Order Limits, such as SSSI's, CWS's, RNR's and ancient woodland parcels. As such, the Site Manager(s) should consider methods such as the use of sprayed water to dampen earthworks and/or access routes as required in order to control this risk in line with the **ES Volume 3, Appendix 13.1 Construction and Decommissioning Dust Risk Assessment [EN01100 14/APP/6.3.13.1]**.
- 4.4.2 The ECoW should also be consulted in order to advise on any particular ecological features which should be avoided entirely during such times, for example ponds, CWS's, SSSI's and watercourses in proximity to the working areas.

4.5 Minimisation of Water and Sediment Runoff

- 4.5.1 The **Outline CEMP [EN0110014/APP/7.1]** contains several measures which specifically deal with the mitigation of potential water runoff and the prevention of potential discharge of contaminants into local watercourses. These include measures are developed in line with good practice guidance and should be adhered to at all times during the construction phase.

4.6 Use and Storage of Chemicals, Fuels and Oils

- 4.6.1 The **Outline CEMP [EN0110014/APP/7.2]** contains several measures which specifically deal with the avoidance of potential water runoff. These measures specifically deal with the minimisation of risk of chemical and contaminant release through their safe usage and storage, and use of spill kits etc. Additionally, as a rule, all refuelling and washing of plant/vehicles, and storage of all potential contaminants will occur at least 20m from all BPF.

4.7 Compliance with Guidance for Pollution Prevention

- 4.7.1 The Site Manager(s) will ensure construction complies with Pollution Prevention for Businesses¹ as prepared by Defra and the Environment Agency.

¹ <https://www.gov.uk/guidance/pollution-prevention-for-businesses>

5 Method Statement 4: Construction Phase Lighting

5.1 Objectives

- 5.1.1 This Method Statement sets out measures to avoid/minimise impacts to light sensitive species including freshwater fish, aquatic and terrestrial invertebrates, small mammals and bats, and is not restricted to nocturnal species.

5.2 Ecologically Sensitive Lighting Strategy

- 5.2.1 Potential construction phase lighting impacts will be avoided through the avoidance of extensive nocturnal working adopting an 07:00 to 18:00 working hours pattern, thereby avoiding nocturnal periods between mid-March and late-September, and similarly during the winter months, only marginally including nocturnal periods. However, some illumination may be required to support specific localised and short-term activities, such as HDD works and deliveries/ movements of Abnormal Indivisible Loads (AILs). Sensitive design of construction phase lighting is detailed within the **Outline Construction Environmental Management Plan [EN0110014/APP/7.1]** and secured through a requirement attached to the DCO.
- 5.2.2 Most notably, artificial working-area lighting should be minimised as far as possible between sunset and sunrise from the months of March and October inclusive during the construction phase of all elements of the Scheme. This aims to limit the potential for adverse impacts on the above species groups (especially bats) during the times of the year when they are most active and therefore sensitive.
- 5.2.3 During the winter period, where artificial lighting may be required, impact will be minimised through the use of portable light sources (rather than area/flood lighting). Construction temporary site lighting will be positioned to ensure that light is directed onto the area of works only with as minimal light spillage upon the areas protected by BPF as possible. The use of LED lighting and cowls, hoods and other similar screens will also be adopted.
- 5.2.4 Any unavoidable artificial lighting during the hours of darkness required within the period March to October inclusive will only be permitted following consultation with the ECoW in order to determine the severity of potential impacts and appropriate mitigation steps, including agreed hours of operation and numbers/specification of luminaires.
- 5.2.5 Prior to the commencement of construction works, and throughout the construction period, the Site Manager(s) will liaise closely with the appointed ECoW. The ECoW will oversee activities within the Order Limits to ensure that

all ecological mitigation measures are implemented correctly and that works remain compliant with this Construction Phase Lighting Method Statement.

- 5.2.6 Security lighting may be installed on temporary site compounds following consultation with the ECoW to establish appropriate locations. Security lighting will be limited to the minimum number of luminaires required which will be defined by the ECoW and based on the sensitivity of the habitats potentially affected and baseline lux levels. Security luminaires will be motion-sensitive and set on a short (<2 minute) timer and oriented to reduce upward light spill as far as possible (i.e. horizontally oriented) in order to reduce the potential impact on light sensitive species such as bats.
- 5.2.7 For further information see the Schemes **ES Volume 3, Appendix 7.11 Lighting Strategy [EN0110014/APP/6.3.7.11]**.

6 Method Statement 5: Permanent Habitat Removal (Solar PV Sites/BESS/Substations and other permanent Infrastructure) - including Avoidance of Impacts on Protected Species

6.1 Objectives

- 6.1.1 Habitat removal will be necessary in a limited number of locations, for example to permit construction/operational access and the installation of the internal maintenance tracks.
- 6.1.2 Many habitats within the Order Limits support protected species or are important in their own right. Consequently, their removal - whether temporary or permanent will require precautionary measures to mitigate the impacts of their loss and/or the potential for unlawful or detrimental impacts on the species they support.
- 6.1.3 Habitats which are of particular value include: **hedgerows, ditches (dry or wet), woodland, individual trees, scrub, grassland (including arable field margins), watercourses, lowland fen, and ponds.**
- 6.1.4 This Method Statement sets out measures to avoid/minimise impacts to these habitats and associated protected species.

6.2 General Precautionary Approach to Habitat Removal Works

- 6.2.1 The Site Manager(s) shall be responsible for liaising with the ECoW in order to agree locations and timings of advance inspections and clearance attendance, including all species-specific measures set out below, as necessary.
- 6.2.2 Habitat clearance, for example (but not limited to) the small sections of hedgerow required for new construction accesses and internal maintenance tracks, will be undertaken during the months of March to October (Ideally September – October to avoid the need to mitigate for nesting birds) inclusive. This will avoid the principal hibernation season for species groups such as reptiles and amphibians and so avoid unlawful harm to these species. Should this not be possible, preliminary habitat reduction works (removing the 10m hedge section to base level and removal of any ruderal/grassland vegetation) will be implemented during the months of March to October inclusive (Ideally September – October to avoid impacts to nesting birds) in order to remove any hibernation potential, and thereby allowing works to commence during the winter months.

- 6.2.3 Wherever the above habitats listed in bold are to be affected, an ECoW should be present and have undertaken an inspection in advance to ensure legal compliance and avoid undue harm to species potentially present.
- 6.2.4 Habitat clearance will be conducted under an ECoW-led ecological watching brief in order to ensure species such as nesting birds, reptiles, amphibians and small mammals are not harmed. Depending upon the nature and density of the vegetation, this inspection may include a combination of a fingertip inspection of vegetation and early morning surveillance of habitat for evidence of bird nesting behaviour. Further species-specific information is given in the sections below. The vegetation may also need to be cleared a small amount at a time to allow the ECoW to search the area thoroughly.
- 6.2.5 Habitat removal at wet ditches should observe good practice guidance on the use of temporary dams and sediment traps available at that time. The input of a hydrological engineer is advisable in order to minimise drainage disruption and localised flooding. Any permanently breached ditches should remain interconnected via the use of open-bottomed culverts or clear-span crossings.

6.3 Reptiles and (widespread) Amphibians

- 6.3.1 See Method Statement 8 for specific measures relating to GCN.
- 6.3.2 Habitat clearance areas will be thoroughly inspected by hand before and during works for widespread reptile and amphibian species such as common toad *Bufo bufo*, slow worm *Anguis fragilis*, common lizard *Zootoca vivipara* and grass snake *Natrix helvetica* in order to remove any animals as the clearance works progress. Any amphibians, reptiles or other animals will be hand released in suitable nearby retained (non-isolated) habitat as determined by the ECoW.
- 6.3.3 The locations to be used for the creation of habitat piles (as prescribed within the **Outline Landscape and Ecological Management Plan (oLEMP) [EN0110014/ APP/7.4]**) will be chosen for their proximity to and connectivity with nearby habitat suitable for reptiles and amphibians (and other wildlife), including tussocky grassland, scrub and hedgerows.
- 6.3.4 Habitat clearance works will follow the seasonal guidance provided within **Section 6.2** (above), in order to avoid inadvertent mortality of reptiles/amphibians during this process, the clearance works of suitable habitats should not take place within the winter months (November to February inclusive) or during temperatures below 8°C. Habitat clearance works, may commence during the winter period if preliminary habitat reduction works are implemented during the months of March to October inclusive (Ideally September – October to avoid impacts to nesting birds) in order to remove any hibernation potential, and thereby allowing works to commence during the winter months.

- 6.3.5 All areas of the habitat mentioned above subject to clearance will be hand searched and removed with hand tools, or mechanically under the supervision of the ECoW, only once reasonable likelihood or absence of reptiles/amphibians has been established. All such habitat creation work should be carried out by individuals with experience of identifying reptiles/amphibians and their habitat.

6.4 Pre-commencement Nesting Bird Checks

- 6.4.1 Clearance of hedgerow, ditch, scrub, trees, woodland and non-grazing pasture grassland should be avoided between the months of March and August inclusive due to the risk of unlawful impacts upon nesting birds. However, where work to suitable habitat within this period is unavoidable, a nesting bird check will be required. This will consist of one or more visual inspections of the habitat to be affected by an appropriate number of suitably experienced ecologists to look for signs of nesting behaviour or nests themselves. Such inspections will likely need to be carried out in the early morning prior to construction activities commencing on site for the day.
- 6.4.2 Where any active bird nests are found, a species-specific buffer zone (actual distance dependent upon species and nest location, as advised by the ECoW) will be created around the nest, the buffer maintained and not disturbed until the nest is no longer in use. Depending upon the location, protective fencing may be appropriate, however, if this is considered likely to aid predators (for use as watching perches etc) and alternative solution will be considered. The ECoW will be able to advise on the anticipated date of fledging based upon the status of the nest and the species involved. Regular inspections of the nest site by an ECoW around the anticipated date of fledging will be necessary to ensure works can continue once the birds have fledged.
- 6.4.3 If species designated under Schedule 9 of the Wildlife and Countryside Act 1981 are recorded in pre-commencement checks (in such arable habitats these may include barn owl *Tyto alba* and hobby *Falco Subbuteo*), the ECoW will advise the Site Manager(s) to cease all works in the vicinity, and a species-specific strategy developed.
- 6.4.4 This advice applies to species nesting in woody vegetation which includes the majority of British birds. However, specific advice on precautions for ground nesting birds which may be present within arable or pasture habitats where the majority of the Solar PV Panels, BESS and Cable Route Corridor are situated is contained in Method Statement 9.

6.5 Tree Inspections for Roosting Bats

- 6.5.1 Following from the Ground Level Tree Assessment (GLTA) surveys for bats (See **ES Volume 3, Appendix 8.5 Ground Level Tree Assessment Report [EN0110014/ APP/6.3.8.5]**) a total of 621 trees, across (or immediately surrounding) the Order Limits, were identified as having Potential Roost

Features (PRF) (PRF-M 213 & PRF-I 217) or 191 could not be fully inspected and were categorised as Further Assessment Required (FAR).

- 6.5.2 Where there are impacts (removal/reduction) to trees assessed as FAR, a more accurate assessment of roosting resource will be required to fully establish the potential presence of PRFs, which could include licenced aerial inspection surveys were considered necessary by the appointed ECoW.
- 6.5.3 If no PRFs are found, then the tree in question can be downgraded to NONE (either no PRF in the tree, or highly unlikely to be any), with no further formal mitigation measures required regarding bats. If PRFs are confirmed the recommendations in the following paragraphs should be followed.

Trees Currently Assessed as PRF

- 6.5.4 Where impacts to PRF-M trees are unavoidable, further survey will be required to confirm the presence or likely absence of bat roosts and characterise any roosts present. These surveys may include licenced aerial inspection surveys (which are only possible upon trees considered to be suitable for climbing and endoscope inspections). If close inspection is not possible then night-time emergence surveys may be required with the use of Night Vision Aids (NVA).
- 6.5.5 If bats are confirmed roosting within the tree(s), no tree works will commence until a EPSML (issued by NE) has been issued and necessary mitigation measures set in place under the supervision of a licensed ecologist. This will ensure there are no adverse impacts on roosting bats and will maintain the favourable conservation status of the roosting bat species in the wider environment.
- 6.5.6 For trees with suitability but no confirmed roosts or trees with features that are assessed as having PRF-I suitability, it is possible that trees could be felled/subject to surgery under a Precautionary Working Method Statement (PWMS). This will likely include a pre-works inspection by the ECoW, appropriate timing of works and potentially soft felling measures. It will be important to ensure there is no net loss of roost resource (opportunities) within the Order Limits, and this may require provision of replacement roost features such as bat boxes and other features appropriate to the bat assemblage present.
- 6.5.7 The ECoW liaise with the Site Manager(s) to ensure that replacement roost features are provided prior to works commencing.

Updated Roost Categorisation

- 6.5.8 Prior to any works commencing, any trees which are due to be impacted by the development will require an updated GLTA by the ECoW, including those previously considered to have no suitability (NONE) for roosting bats. This is due to a variety of factors (such as storm damage and disease) which can lead to the creation and loss of PRF's from trees relatively

speedily. This will ensure that any change in the suitability of trees for bats will be identified, and risks suitably mitigated, where necessary. Following from this, the actions detailed above should be followed.

6.6 Badgers

- 6.6.1 See Method Statement 10 for specific measures relating to badgers.

6.7 Riparian Mammals

- 6.7.1 No otter *Lutra lutra* and water vole *Arvicola amphibius* field signs have not been recorded within the Order Limits during the 2025 field surveys, and therefore, both species are currently considered to be not present within the Scheme (see **ES Volume 3, Appendix 8.8 Water Vole and Otter Survey Report [EN0110014/APP/6.3.8.8]**). Therefore, impacts/disturbance are considered to be unlikely.
- 6.7.2 Adopting a precautionary principle, particular attention will be paid to any habitat removal works affecting or within 30m of a watercourse for the potential presence of otters and water voles.
- 6.7.3 All applicable habitat removal works will be preceded by an inspection of habitat at least 50m upstream and 50m downstream of the clearance extent to look for signs of these species and their sheltering sites. The inspection will be carried out one month in advance of works commencing by a suitably qualified ecologist.
- 6.7.4 In the event that water vole burrows/latrines, or otter holts/resting places are found, the ECoW will discuss this with the Site Manager(s) and efforts to alter the location of the clearance to avoid direct impacts will be made in the first instance.
- 6.7.5 Should impacts upon water voles/otters or their resting places be unavoidable, it will be necessary to delay commencement until a licence has been secured through Natural England. Licences may be contingent on seasonal timing restrictions, sensitive working methods and habitat compensation. In respect of water voles in Norfolk, Strategic Licences, CL31 class licences, and standard water vole mitigation licences are all options that can be considered, depending on impacts and timescales involved. In terms of otter; a European Protected Species Mitigation Licence (EPSML) would be required to impact/disturb an otter holt/resting place.
- 6.7.6 Culverted or overbridged ditches and watercourses should be designed to permit the continued passage of water voles and otters. The advice of the ECoW should be sought in this instance.

6.8 Other Priority Mammals (Polecat, Hedgehog, Brown Hare and Harvest Mouse)

- 6.8.1 As it is an offence to cause harm to wild mammals, the ECoW will carry out a fingertip search of all habitat to be removed before and during the clearance operation as appropriate. Any burrows discovered will either be avoided where practicable through alteration of the location of works, or if unavoidable, be destructively searched by hand and in a methodical manner in order to ensure no animals are trapped underground or harmed. In order to do this the ECoW will need to confirm that other protected species such as otter or badger are not present (which may potentially require delays whilst the ECoW deploys motion-censored cameras to confirm).
- 6.8.2 Any animals discovered during works will be allowed the opportunity to disperse from the works area naturally, or if unavoidable, relocated by hand, where collection is possible, to a suitable undisturbed location to be determined by the ECoW. Any injured animals should be taken to the nearest wildlife rescue service as given at the front of this document.

6.9 Invasive Non-Native Species

- 6.9.1 See Method Statement 11 for specific measures relating to Invasive Non-native Species (INNS).

7 Method Statement 6: Temporary Habitat Removal and Reinstatement (Cable Route Corridor) - including Avoidance of Impacts on Protected Species

7.1 Objectives

- 7.1.1 The installation of cables within the CRC will involve the temporary removal and reinstatement of habitats such as grassland field margins, hedgerows, and ditches. These habitats are of value in themselves but also have the potential to support protected species.
- 7.1.2 All precautions (including species-specific measures) contained within Method Statement 5 will be followed in carrying out habitat removal works in relation to the CRC. Further steps set out below will be followed to ensure adequate habitat reinstatement. It is anticipated that the average working width during cable route construction will measure approximately 25m in width, comprising a haul route and the cable trench itself, with additional soil storage, intermittent jointing bays and set down areas/working compounds. The working width will narrow to 10m at hedgerow/ditch/field margin crossing points along the CRC and in specific areas to avoid important ecological features such as mature trees and ponds. Habitat removal is anticipated to occur in all these locations, however temporary trackway matting or other temporary removable surfaces would aid the minimisation of habitat losses. Arable fields (and some intensively grazed modified grassland pasture) occupy the vast majority of land within the CRC and are of little intrinsic ecological value, therefore no specific reinstatement protocol is required. Habitat removal and reinstatement advice covers impacts upon semi-natural grasslands (field edges/margins), ditches, and hedgerows.
- 7.1.3 Other non-agricultural habitats present within the CRC include scrub, lowland fen, watercourses and ponds; these are avoided and subject to BPF and HDD and are therefore not discussed further here.
- 7.1.4 All habitat reinstatement work should be carried out by suitably qualified or experienced landscaping or conservation contractors, and will be designed with input and site-specific knowledge from the ECoW and monitored for success during the construction works period.

7.2 Grassland

- 7.2.1 Semi-natural grassland; mainly consisting of arable field margins and roadside verges, are present within the CRC routes, this method statement does not include modified grassland within grazing pasture fields and/or grassland crops (silage etc) which are of negligible ecological value.

- 7.2.2 Prior to the removal of small areas of roadside verge, during the nearest growing season the ECoW or appointed botanist of FISK 4 rating or above (if the ECoW does not have this level of experience) should assess the botanical diversity of areas of grassland identified for impact by CRC/access works.
- 7.2.3 Wherever possible (where excavation is required), turf should be stripped and set aside during initial trench cutting (the ECoW ensuring the adequate storage and watering of these) for eventual replacement, where cable installation works are anticipated to be of a short enough duration for the turf to be successfully replaced.
- 7.2.4 Where this is not a viable option (i.e. the proposed works are not of a sufficiently short duration to store and manage turfs) topsoil should be stripped and stored in an appropriate location (to be agreed with the ECoW). Following the completion of works, backfilled trenches and disturbed ground will be levelled, rolled and harrowed as necessary, and stored topsoil spread across the impacted area. Following from topsoiling, grassland can be re-seeded.
- 7.2.5 An appropriate seed mix will be used which will be in keeping with, or of greater diversity than, the habitat type and species assemblage as recorded during baseline habitat surveys (see **ES Volume 3, Appendix 8.1 Ecological Desk Study & Extended Habitat Survey [EN0110014 APP/6.3.8.1]**), the potential availability of locally sourced species-rich green hay will be explored prior to commencement and considered by the ECoW (including sourcing a hay cut directly from the affected area if considered suitably species-diverse), which would also be an alternative to seeding.
- 7.2.6 If temporary access is required across a roadside verge/field margin grassland without the requirement for excavation (i.e. in areas marked for temporary access and no CRC associated excavations) the use of grassmats (or other similar ground protection apparatus) will be considered if the location is appropriate to avoid localised grassland compaction / damage.
- 7.2.7 In addition to the above measures, in the unlikely event that the ECoW (or appointed botanist) records any sufficiently rare and scarce plants species² these would be marked by the ECoW and avoided. If this is not possible, species-specific measures will be adopted, which may include turfs containing

² Sufficiently rare and scarce plant species consist of:

- Legally protected species listed under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) and/or Annex IV (b) of the EU Habitats Directive
- Priority species listed within Section 41 of the Natural Environment and Rural Communities Act 2006
- Species listed as 'Critically Endangered', 'Endangered', 'Vulnerable' and 'Near Threatened' within *A New Vascular Plant Red List for Great Britain* (Stro, P et.al. 2025). Available at: <https://britishandirishbotany.org/index.php/bib/article/view/195/248>
- Species listed as 'Nationally Rare' or 'Scarce' taxa (revised 2024). available at: [nationally_scarce_-_rare_2024-02.xlsx](#)
- Species listed as 'Rare' or 'Scarce' within the provisional list of Norfolk Species of Conservation Concern (Norfolk Flora Group. 2017) (unless the a 'Norfolk Rare Plant Register if published in the meantime). Available at: [Microsoft Word - A provisional list of Norfolk species of conservation concern Dec 2017.doc](#)

these species being marked and reinstated within suitable impact-free habitat adjacent (as advised by the ECoW), or seed collection and storage methods can also be adopted (especially for annual and bi-annual species); with seed distributed within the impacted habitats following from reinstatement.

7.3 Hedgerows

- 7.3.1 Hedgerow sections to be cleared should be translocated wherever practicable. This will involve the removal of hedgerow plants to include their rootballs, to be set aside until they can be replanted in the original location. Translocation is likely only to be successful when undertaken during the autumn and winter months when plants are most dormant, and when the duration of trenching at a particular location is short enough to allow plants to survive being removed for this period. The decision of whether conditions allow for the translocation of hedgerow will be made by the ECoW, and will take into account any other risks associated with the location (such as the possibility of encountering GCN).
- 7.3.2 Where translocation is not possible, hedgerows will be replanted using whips of the same species as was removed, with the addition of a proportion of other locally appropriate species to increase diversity. Planting (to suppliers' specifications) should be undertaken in the first planting season (autumn or winter) following removal to ensure a high degree of success and be planted with tree guards to protect against herbivore browsing.

7.4 Ditches

- 7.4.1 Minor agricultural field drains and ditches will be subject to open cut trenching unless otherwise identified as being of particular ecological importance as to require trenchless techniques. The majority of these ditches are only seasonally wet and often fully dry and are of relatively low ecological value. Wherever possible, and where the duration of works at a particular location allows, any aquatic or marginal plants should be collected for later replanting to minimise the recovery of the habitat after completion of works.
- 7.4.2 All ditch impacting works will follow good practice guidance on the use of sediment/silt traps and temporary dams³ to minimise the risk of drainage disruption, sediment release and local flooding (see Method Statement 3).

³ <https://www.gov.uk/countryside-stewardship-grants/sediment-ponds-and-traps-rp7>

8 Method Statement 7: Precautionary Horizontal Directional Drilling (HDD) Methodology

8.1 Objectives

- 8.1.1 The use of HDD techniques during cable installation will avoid direct habitat damage and degradation. However, there still remains the risk of damage through improper siting of entry/exit pits, resulting in a shallow drill depth, and the subsequent potential for excessive vibration to cause disturbance to species such as freshwater fish, white-clawed crayfish, or release of sediments which could harm watercourses and aquatic invertebrates among other species. This Method Statement provided guidance to avoid/minimise effects to ecology from these associated HDD works.

8.2 Precautionary Approach to HDD Works

- 8.2.1 The Site Manager(s) will be responsible for liaising with the ECoW to agree timings and locations of HDD operations to ensure attendance at each event and ensure that the ECoW has undertaken a pre-commencement check for protected species (such as water vole and otter).
- 8.2.2 The ECoW will advise on the most appropriate locations for entry and exit pits (at least 10m from watercourse bank tops and ditches) as well as associated access and set down areas in order to avoid impacts on retained habitats of ecological value such as arable field margins, hedgerows and diverse grassland. The ECoW may undertake hand searches of habitat to be removed as necessary.
- 8.2.3 Where HDD is used beneath the Hempnall Brook (CRC7), the ECoW will discuss the risk of causing excessive vibration and the release of sediments with the operatives and engineers overseeing HDD works to ensure an adequate depth of at least 5m (below the surveyed watercourse) is used. Here, during the drilling operations, the ECoW (or an assistant) will monitor the water column for sediment release during all stages of HDD work. In the unlikely event that sedimentation occurs, drilling may need to temporarily cease until depths and working methods can be adequately readjusted.
- 8.2.4 Advice from the Environment Agency or a specialist hydrological engineer may be required in order to help contain sediments during works, including the use of silt traps.
- 8.2.5 Entry and exit pits should be covered overnight to avoid trapping species such as badgers and other small mammals (see Method Statement 10).
- 8.2.6 Further details regarding the embedded avoidance and mitigation measures associated with the HDD operations are provided within the **Outline Cable Route Construction Statement [EN0110014/APP/7.21]**.

9 Method Statement 8: Specific Measures for Avoidance of Impacts on Great Crested Newts

9.1 Objectives

- 9.1.1 The presence of great crested newts (GCN) has been established (or in some cases assumed) in ponds within the Order Limits (five ponds confirmed and six assumed presence within the Order Limits) and in the surrounding landscape within 250m of the Order Limits (see **ES Volume 3, Appendix 8.3 Great Crested Newt Survey Report [EN0110014/APP/6.3.8.3]**, which has been updated at Deadline 1). Given the potential for GCN to be encountered within parts of the Order Limits during their active period, this precautionary non-licensed Method Statement has been prepared to ensure that offences are not committed under wildlife legislation in relation to GCN.
- 9.1.2 This precautionary Method Statement restricts certain construction activities within particular areas of the Order Limits to occur when GCN are active. In the unlikely event that these restricted work activities are considered unavoidable within the dates shown below, this will be discussed with the ECoW, as well as potentially Natural England and the Local Authority ecologist, and may result in a delay to construction works and a requirement for protected species mitigation licences (or similar) if appropriate, prior to works commencing within the area.
- 9.1.3 The approach to GCN avoidance differs between the temporary construction impacts within the CRC/Highway Improvement Areas and the avoidance measures implemented with the Sites (Solar PV Sites/substations/BESS and other areas of permanent infrastructure). Therefore, where appropriate the differences in approach will be highlighted in the sections below.

9.2 Mitigation Approach

- 9.2.1 Taking into account the habitats present within the Order Limits which largely consist of arable farmland of negligible value to GCN, the large majority of the proposed scheme design utilising these negligible value habitats and protecting/enhancing more valuable retained semi-natural terrestrial habitats, retention and protection of ponds and surrounding environment, and the small scale of the works it is considered reasonably unlikely that the works will result in deliberate capture, injury or killing of great crested newts.
- 9.2.2 Similarly, it is considered reasonably unlikely that the Scheme proposals will result in deliberate disturbance to GCN in such a way as to be likely to impair their ability to survive, breed, reproduce, rear or nurture their young, hibernate; or to affect significantly the local distribution or abundance of GCN.
- 9.2.3 Due to the limited potential for GCN to be using the predominantly arable habitats within the area of works it is considered reasonably unlikely that the

Scheme will result in damage or destruction of their resting places. As the works will not affect breeding ponds, they will not involve deliberate taking or destroying the eggs of GCN.

- 9.2.4 Therefore, on the basis of specialist knowledge and experience working with on similar solar development sites, it is considered on balance that the Scheme is unlikely to result in an offence under Regulation 41 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations) and no EPSML is required.
- 9.2.5 Similarly, it is considered reasonably unlikely that works will result in disturbing a great crested newt in its place of shelter or obstructing access to such a place and therefore the Scheme is reasonably unlikely to result in an offence under the Wildlife & Countryside Act 1981 (as amended).
- 9.2.6 However, to further ensure that such an offence is not committed, it is proposed to adopt the methodology detailed within this Method Statement.

9.3 Biodiversity Protection Fencing (BPF)

Solar PV Sites (including BESS/substations and other permanent infrastructure)

- 9.3.1 The BPF (as detailed in Method Statement 2) will include protective buffers of 30m around all ponds, extending to 50m for ponds with confirmed evidence of GCN or where the presence of GCN is assumed (for example where survey results are inconclusive or access permission could not be obtained to complete a survey). A 50m buffer has been applied as impacts upon suitable GCN terrestrial habitats within 50m of a breeding pond are potentially more impactful than those within 50-250m of a breeding pond (English Nature, 2001⁴),
- 9.3.2 As with all other areas within the BPF, no site personnel or construction machinery shall enter the Buffer Zones by crossing the BPF and no equipment will be stored therein. The only exceptions will be where access for essential/unavoidable operations have been agreed in advance with the ECoW (such as habitat enhancement works for the benefit of the species).
- 9.3.3 BPF installed surrounding ponds is presented within **Figure 1**.

Cable Route Corridor/Highway Works

- 9.3.4 The approach to avoidance within the CRC is very much adhered to the information provided above with 50m avoidance areas installed and observed through the temporary cable or highway improvement works, however, within

⁴ English Nature. (2001). Great Crested Newt Mitigation Guidelines. Available from: https://mokrady.wbs.cz/literatura_ke_stazeni/great_crested_newt_mitigation_guidelines.pdf

some areas, limited construction works may potentially impact small areas of habitats within 50m of breeding (or potential breeding ponds).

- 9.3.5 These CRC impact areas will utilise suboptimal habitats, and will be temporary in nature, and habitats restored immediately following from completion. This consists solely of Pond 222 (negligible value arable land potentially impacted within 50m).
- 9.3.6 Additionally, the following ponds are located within 50m of proposed Highway Works areas:
- Ponds 232 and 233 are located within 50m of Highway Works LHL,
 - Ponds 234, 237, and 238 are located within 50m of Highway Works area LCH,
 - Ponds 105, 106, 107 and 108 are located within 50m of Highway Works area 'Slither 3' adjacent to Sub-Site 7D,
 - Pond 258 is located within 50m of potential highway works associated with Sub-Site 7D,
 - Pond 204 is located within 50m of potential highway works associated with CRC4.
- 9.3.7 Habitat impacts within these areas will be minimal, likely consisting of hedgerow trimming/reduction and tree canopy reduction works which would not impact upon GCN terrestrial habitats.
- 9.3.8 Pond 95 is located within 50m of the existing Fairstead Lane, which will be used for access purposes to Sub-Site 7C (and continued use for access to Grove Farm), impacts here will be minimal due the existing use as an access track.
- 9.3.9 All pond locations, and 50m GCN buffer zones are provided within **Figure 1**. The overall impact of working within 50m of these ponds is considered to be negligible.
- 9.3.10 Where 50m buffer exclusions are not possible within the temporary impact areas, the ECoW will liaise with Site Manager(s) and agree on the maximum avoidance area possible, which will be observed during the specific works in that area.

9.4 Great Crested Newt Working Areas

- 9.4.1 This Method Statement will apply to all works including the installation of Solar PV Panels and associated works within a GCN Working Area, which extend 250m from ponds which are either known to support GCN or have not been subject to GCN surveys (and therefore presence of GCN is assumed on a precautionary basis). 50-250m is classified as the intermediate terrestrial GCN

zone, with impacts upon suitable GCN habitats within this area being significantly less impactful (English Nature, 2001).

- 9.4.2 The edge of the GCN Working Areas will be defined with semi-permanent high visibility marker posts installed in the ground. These would be installed at regular (approx. 50m) intervals along the edge of a GCN Working Area so that operatives can see when they enter into a GCN Working Area and thus when additional consideration as to the presence of GCN and adherence to the requirements of this Method Statement is required.
- 9.4.3 There are ponds located within and surrounding the CRC and Sites that have either not had landowner permission to survey, or environmental DNA (eDNA) testing has resulted in inconclusive results. Therefore, a precautionary principle has been adopted for these ponds and GCN presence has been presumed (unless confirmed otherwise, for example landowners confirming that ponds are not present/dry) and 250m GCN working areas have been applied. It is possible, that further eDNA surveys could be undertaken prior to the works commencement to confirm presence/absence from these ponds. Subsequently, precautionary GCN working areas applied here could be subject to removal, and therefore, should be treated as outline and precautionary at this stage.
- 9.4.4 GCN Working Areas are provided within **Figure 1**.

9.5 Toolbox Talk

- 9.5.1 Site operatives will be provided with a toolbox talk prior to commencing any work within the GCN Working Area. This will inform all operatives of the importance to restrict all working activities within suitable habitats which may support GCN. Contractors will be provided with visual guides on the identification of GCN in the unlikely event that any are encountered during the works.
- 9.5.2 In the event a change in Site Management personnel occurs during construction or a pause in works of a period of more than 30 consecutive days occurs, the toolbox talk will need to be provided again by the appointed ECoW. The Site Manager will be responsible for relaying information within the toolbox talk to all subsequent site staff during their initial site inductions.

9.6 Precautionary Approach to Works within Great Crested Newt Working Area

Pre-Construction Work

- 9.6.1 Arable and grassland fields within the GCN Working Areas will be maintained as ploughed, grazed or mown short (sward height of less than 100mm) until construction commences and for the duration of the construction phase, to

maintain the sub-optimal nature of these habitats for amphibians and prevent colonisation of working areas during the construction phase.

- 9.6.2 The GCN Working Areas will be subject to a walkover inspection by the ECoW within the GCN active period (1st March to 31st October) prior to any construction work commencing within a given GCN Working Area. Any clearance, of potentially suitable hibernation habitats, for example (but not limited to) the small sections of hedgerow required for new construction accesses and internal maintenance tracks/CRC routes, will be undertaken during the months of March to October inclusive. This will avoid the principal hibernation season for the species. Should this not be possible, preliminary habitat reduction works (removing the 10m hedge section to base level and removal of any ruderal/grassland vegetation) will be implemented during the months of March to October inclusive (Ideally September – October to avoid impacts to nesting birds) in order to remove any hibernation potential, and thereby allowing works to commence during the winter months.
- 9.6.3 During the above process, any discrete features (such as log piles, stone/rubble piles and cut brash) potentially suitable for use as shelter by GCN which are found to lie within a construction area will be subject to a fingertip search by the ECoW, and will then be removed from the working area under ECoW supervision and used to create habitat piles in close proximity to existing or newly created ponds (subject to ECoW advice).

Timing of Work and ECoW Supervision During Hedgerow Clearance

- 9.6.4 Any removal of hedgerows or scrub habitat within the GCN 250m Working Area must be completed under ECoW supervision. Hedgerows may be cut at any time of year (to a minimum height of 300 mm), however, in order to minimise the risk of impacting GCN, the removal of hedgerow rootballs and bases will be prohibited between November to February inclusive, as GCN will typically be hibernating and may be present within hedgerow root systems and other sheltering features at the bases of hedgerows during this period. The removal of hedgerow roots and stumps must therefore take place within the active season, comprising 1st March to 31st October inclusive (assuming daytime temperatures reach a minimum of 8°C), under ECoW supervision, unless this work is covered separately under a great crested newt mitigation licence.

Materials and Site Compounds

- 9.6.5 Due to the confirmed/assumed presence of GCN within associated ponds, there is a small risk that any materials stored within a GCN Working Area may be used by newts as shelter overnight (specifically between March and October). If newts are subsequently encountered beneath materials stored within the GCN Working Area, the removal of these materials would risk disturbance and potentially injury of newts and may therefore constitute an offence under the Wildlife & Countryside Act 1981 (as amended) and the Habitats Regulations. Therefore, in order to avoid the risk of offences

occurring, the storage of materials and erection of site compounds within GCN Working Areas will be avoided wherever possible.

- 9.6.6 Should the storage of materials or erection of site compounds be unavoidable within a GCN Working Area, then suitable GCN habitats should be actively avoided (i.e. utilisation of unsuitable arable farmland). Currently, all site compounds are proposed for arable farmland habitats and therefore of negligible value for GCN. In the unlikely event that suitable habitats for GCN are present within an identified material storage/site compound area will first be subject to a destructive search under ECoW supervision, during the active season (March to October inclusive). Following the removal of any suitable habitats or sheltering features for GCN, habitat would be managed to deter GCN for the duration of the use of the site compound/material storage area.

Monitoring of GCN Working Areas

- 9.6.7 Given the ongoing risk (albeit low) to GCN during works within the GCN Working Areas, the ECoW will monitor the implementation of the GCN Working Areas, the associated exclusion fencing, and adherence to the precautionary working methods therein as part of the construction phase monitoring visits detailed in Method Statement 12.
- 9.6.8 In the event that GCN are encountered, they will be left in-situ unless they are at risk of immediate harm. The Site Manager(s) will ensure that the ECoW is contacted immediately, and any works within the GCN Working Area and 50m from the area within which the newt was found must temporarily cease pending further advice from the ECoW. The recommencement of work may need to be delayed until a protected species mitigation licence can be obtained, as advised by the ECoW

10 Method Statement 9: Avoidance of Impacts on Skylark (and other ground nesting birds)

10.1 Objectives

- 10.1.1 During the survey work undertaken (see **ES Volume 3, Appendix 8.4 Breeding Bird Survey Report [EN0110014/APP/6.3.8.4]**), a total of 81 Skylark *Alauda arvensis* breeding territories were recorded across the surveyed area. This is the only species of ground nesting bird that have been confirmed as a breeding within the Order Limits and which occupy open habitats such as arable and pasture grassland.
- 10.1.2 Skylarks are Red listed (reflecting their status as being of highest conservation concern and in particular substantial recent population declines) and are listed as Species of Principal Importance for the purpose of conserving biodiversity in England within the lists prepared under Section 41 of the NERC Act 2006.
- 10.1.3 The Skylark in particular is widespread across the UK, traditionally linked to open farmland, meadows, and heathlands. The species has undergone major declines and numbers fell by around 60% between the mid-1970s and late 1990s, with slower declines continuing into the 21st century before a more recent upturn. This prolonged population decline led to the species' listing on the UK 'Red List' of Birds of Conservation Concern (Stanbury *et al.*, 2021).
- 10.1.4 Despite declines, Skylarks remain a familiar feature of the UK countryside, with an estimated 1.6 million breeding pairs in 2016 (Woodward *et al.*, 2020). According to the most recently available BTO report (Heywood *et al.*, 2025), numbers have increased by 9% during the past decade and nearly 20% in the last five years in south-east England and the East Midlands for example.
- 10.1.5 Population data at a county level is available for Norfolk, where the 2007 populations was estimated to be 25,000 to 30,000 breeding pairs (Taylor and Marchant, 2011). Therefore, numbers of Skylark within the site represent <1% of county populations and accordingly, are unlikely to be considered significant in the national or county context.
- 10.1.6 As development operations will occupy large areas of open arable habitats, precautions will be necessary to avoid unlawful impacts on the birds and their nests, most notably upon skylark.

10.2 Proposed Mitigation Approach

- 10.2.1 The proposed mitigation and compensation strategy will incorporate a package of measures in order to provide continuous opportunities for the relevant species in combination with a range of other bird and wildlife species across the site. Measures will include the following:

- Provision of new managed open grassland areas providing specific opportunities for ground nesting species;
 - Favourable management of grassland margins and associated habitats which will provide increased foraging value and therefore raised carrying capacity across the site as a whole for these species; and
 - Incorporation of Skylark plots within retained arable land located within the Order Limits.
- 10.2.2 All habitat creation/enhancement work should be carried out by suitably qualified or experienced landscaping or conservation contractors and will be designed with input and site-specific knowledge from the ECoW and monitored for success during the construction works period.
- 10.2.3 Further consideration in regard to the individual measures for skylark are presented below:
- Managed Open Grassland Area
- 10.2.4 In addition to the opportunities provided by the creation of grassland margin habitats (and grassland within the Solar PV Sites) long-term breeding opportunities within the Order Limits will be provided by the creation of open grassland habitats within Sub-Sites 3, 4B, 8B and 10B, measuring approximately 12.5ha. These areas will be managed to enhance biodiversity, including enhancing opportunities for ground nesting bird species.
- Favourable Management of Grassland Margin habitats
- 10.2.5 Favourable management of grassland and other habitats across the Sites (including retained farmland areas) will provide enhanced foraging habitats for bird species including skylark, which would potentially increase breeding productivity within nearby breeding territories immediately surrounding the Order Limits.
- 10.2.6 Whilst there is no evidence of skylark nesting within solar arrays, they are consistently recorded foraging and displaying above or adjacent to solar installations. This indicates that solar farm sites grassland margins offer supplementary habitat for nearby pairs, which may not be available in the absence of habitat management associated with the Scheme.
- 10.2.7 Such behaviour has been recorded during monitoring visits to solar farms in 2024, where behaviour indicated that the solar farm offered a preferred resource for foraging above arable land (Solar Energy UK, 2024⁵). Solar Energy UK's Solar Habitat 2025 report⁶ found that skylark were recorded exhibiting foraging behaviour within or immediately adjacent to panel arrays in 59% of surveyed solar farms; providing evidence of the use of solar farms

⁵ Solar Energy UK (2024). *Solar Habitat: Ecological Trends on UK Solar Farms*. London: Solar Energy UK.

⁶ Solar Energy UK (2025). *Solar Habitat: Ecological Trends on UK Solar Farms*. London: Solar Energy UK.

as a foraging resource. (Secker, 2024⁷) recorded the species carrying food at two solar farms, all of which were observed during the late breeding season visit when Skylarks spent a higher percentage of their time foraging on solar farms. This indicates solar farms can supplement food resources in the local landscape throughout the breeding season, when resources in farmed land reduce as crops mature.

Skylark Plots

- 10.2.8 To further mitigate the loss of skylark breeding opportunities as a result of the proposals, it is proposed to provide skylark plots within retained arable areas located within the Order Limits, in order to further increase the carrying capacity of these areas for the species.
- 10.2.9 A 'skylark plot' is a small undrilled or sprayed fallow patch created inside a field of cereal crops, designed to provide habitat for breeding skylarks. However, skylarks do not nest within the plots, rather the plots provide a valuable foraging area and enable the birds to access densely cropped fields from the ground (Fox, 2022⁸). According to the UK government's Environmental Land Management Scheme (ELMS) action-sheet 'AHW4: Skylark plots' (DEFRA, 2024⁹), the plots must be sited in large, open winter-cereal fields (5 ha or more). They should be located away from field edges, tramlines, poles or pylons (for example around 50 m or more from the boundary). Plots are most effective when each patch is at least 16 m² in area. Two plots per hectare in winter cereals have been shown to significantly boost chick production.
- 10.2.10 The ECoW with the Site Manager(s) and associated Land Managers to ensure that skylark plots are delivered within retained farmland prior to the commencement of construction works on Site.
- 10.2.11 In order to provide an approximate guide as to the likely levels of skylark plot provision to provide appropriate levels of compensation in regard to displaced territories, the proposals have been assessed following the methodology proposed by Fox (2022). The methodology requires a number of inputs and assumptions to be made in order to provide an estimate of optimal compensation in terms of the amount of land required to accommodate appropriate numbers of skylark territories. The associated data input is summarised within at **Table 10-1** below.

⁷ Secker, B. (2024). *The diversity and behaviour of farmland birds on solar parks in the UK* (MSc by Research thesis, Lancaster University, 2024). Available from: <https://eprints.lancs.ac.uk/id/eprint/225514/1/2024SeckeMScbyResearch.pdf>

⁸ Fox, H., "Blithe Spirit: Are skylarks being overlooked in impact assessment?", InPractice 117 (Sept. 2022) [Clarkson & Woods Ltd.], Available from: https://www.clarksonwoods.co.uk/wp-content/uploads/PDF/HF%20from%20InPractice117_Sep2022-9.pdf

⁹ Further information available from: <https://www.gov.uk/find-funding-for-land-or-farms/ahw4-skylark-plots>

Table 10-1. Contributing Data Used to Assess Skylark Mitigation Approach

Variable (Fox, 2022)	Parameter for input	Assumptions made	Input figure
A (1)	Number of skylark territories within the development footprint.	81 territories were recorded within the Survey area, however 11 territories were located in areas not identified for development.	70 pairs
B (2)	Survey area size	Habitats within the Order Limits: 1425.85ha. Figure does not include the buffer adopted for inclusion of species listed under Schedule 1 of the Wildlife & Countryside Act (1981)	N/A
C (3a)	Proportion of territories to be compensated	Assumed compensation target of 50% of baseline territories	50% (0.5)
D (3b)	Number of territories within 75m of development edge and therefore likely absorbed within adjacent suitable habitats due to increase in foraging availability.	Number of recorded territories located within the 75m development boundary within the Site.	2 pairs
E (3c)	Allowance for additional carrying capacity	Are of 12.5ha of available land (not including the 50m field boundary border not considered available for skylark use) within the Order Limits as detailed in the Green Infrastructure Strategy.	4 pairs
F (4)	Baseline territory density within wider land proposed for Skylark plots	Number of recorded territories divided by the area of land within the Order Limits (the Survey Area) to measure of the overall density of breeding skylark within the Order Limits	0.05 pairs/ha
G (5a)	Potential density for proposed land use type within compensation areas	Potential density of breeding skylark based on the estimated optimal density of those habitats within the skylark mitigation area dominated by arable farmland habitats with the inclusion of skylark plots as detailed in Fox (2022)	0.8/ha

10.2.12 In consideration of the methodology set out by Fox (2022), the appropriate compensation area is calculated as follows:

- $\text{Appropriate compensation area (ha)} = ((A \times C) - (D + E)) / (G - F)$

10.2.13 Based on the assumptions set out using the above methodology a compensation area of 38.67ha arable land is identified.

10.2.14 Accordingly, it is proposed to provide additional compensation through the inclusion of skylark plots (at a frequency of 2 plots per hectare in line with standard guidance) across an area of 38.67ha retained arable farmland for the life of the Scheme (following decommissioning, the large majority of habitats would be reverted to their baseline agricultural condition, therefore, further compensation would be unwarranted).

10.2.15 In addition to those 70 territories within the development footprint, there are a further seven territories recorded during baseline surveys located within the proposed skylark mitigation areas. To factor these into the skylark mitigation areas, an allowance for a further seven territories should be considered at a

density of 0.8 pairs per hectare requiring a further 8.75ha of suitable land. This would bring the total to 47.42ha.

10.2.16 In order to reflect cropping rotations whilst ensuring skylark plots are provided within the most suitable areas, the precise locations of plots would necessarily vary from year to year, such that a larger area within the Order Limits of 60ha has been identified, within which at least 40ha arable land will be managed to include Skylark plots on a rotational basis (see **Figure 2**). This will also accommodate the seven additional baseline territories included within the skylark mitigation areas.

10.2.17 Areas identified for skylark mitigation are provided within **Figure 2**.

10.2.18 It is considered that the above skylark mitigation provision will also benefit a range of other ground-nesting species present locally, including grey partridge and corn bunting.

10.3 Pre-Commencement Nesting Bird Checks

10.3.1 Between the months of March and August inclusive, when undertaking construction works within arable or pasture fields, nesting bird checks will be carried out to ensure no nests are at risk of harm and that development works do not commit unlawful acts. As the species concerned are dependent on long, unbroken sightlines of between 75m and 200m for predator avoidance, they are unlikely to be present within close proximity to existing development activities. Therefore, nesting bird checks are most important when development activities progress into previously undeveloped fields during the nesting season. In order to minimise disruption to development activities, close communication on the development programme between the Site Manager(s) and the ECoW is essential. Habitat degradation, such as mowing vegetation to a short sward height, and dissuasion techniques, such as kite deterrents, may be employed in advance of the nesting season (and maintained up until the onset of development activities) in order to reduce the requirement for nesting bird checks.

10.3.2 In the event a nest is discovered, its location shall be mapped and shared with the Site Manager(s) and the location will be avoided, and a species-specific buffer radius of at least 50 m observed, to be advised by the ECoW (depending on species). The nest location will be revisited around the time of predicted fledging (derived from the status of the nest upon discovery) to confirm fledging and inactivity, enabling development activities to resume.

11 Method Statement 10: Specific Measures for Avoidance of Impacts on Badgers

11.1 Objectives

- 11.1.1 Multiple badger setts have been identified within and adjacent to the Order Limits. Badgers are also likely to use the land within the Order Limits for foraging and dispersal in various locations. Badgers are legally protected from disturbance and harm, as well as interference with their setts. Measures given here will ensure that development works proceed lawfully.
- 11.1.2 For further information see ES Volume 3 Appendix 8.7 Badger Survey Report (confidential) [EN0110014/APP/6.3.8.7].

11.2 Pre-commencement Survey

- 11.2.1 As badgers can excavate new setts in a relatively short time, an update survey for badger setts of land within the Order Limits prior to construction commencing will be necessary. This will specifically focus on all habitats potentially suitable for sett excavation by badgers within the Order Limits, in particular hedgerows, field margins, scrub, tussocky grassland and woodland or groups of trees. The survey will pay close attention to locations of these habitats which are the subject of habitat loss or land use change under the works plans. The locations of new hedgerow gaps for construction access or CRC works will be particularly key, but also locations where landscaping, access tracks, fencing, and other infrastructure will be installed within a 30m radius of suitable habitats.
- 11.2.2 The survey will be carried out by appropriately experienced ecologists or ECoW who have prior experience of surveying for badgers. The survey will be carried out approximately three-months prior to the commencement of construction activities within a particular Site or section of CRC. The Site Manager(s) will liaise with the ECoW to ensure that this survey is completed ahead of works in a particular location.
- 11.2.3 The survey will look for evidence of badger activity within the Site, including setts, paths, hairs, footprints or faeces and record the location of and type of all setts at the Site, as well as their activity status. Where necessary, should any new setts be identified, the BPF as detailed in Method Statement 2 will be adapted to incorporate a revised buffer zone of 30m around the identified entrances. In order to confirm badger presence, the ECoW may need to deploy motion-censored cameras over a period of time considered appropriate by the ECoW (likely up to two weeks).
- 11.2.4 The results of the survey/s will be communicated to the Site Manager(s) with any necessary recommendations for revised buffers or precautionary working methods and supervision.

- 11.2.5 Conducting a check three months prior to commencement of works may allow sufficient time to obtain a mitigation licence (see below) should one be required. However, this would not guarantee that no further badger activity would take place on Site and therefore the ECoW would be required to undertake a final check immediately before works commence in a particular area.

11.3 Toolbox Talk

- 11.3.1 Prior to the commencement of works at any of the Sites or CRC installation areas, a toolbox talk will be provided by the ECoW to the Site Manager(s) and contractors. The toolbox talk will include details on the potential for encountering badger setts and other mammal burrows during works to suitable habitats, along with information on their legal obligations and what to do if a sett or burrow is discovered.
- 11.3.2 The talk will establish the role of the ECoW and site personnel during works. In the event a change in Site Management personnel occurs during construction or a pause in works of a period of more than 30 consecutive days occurs, the toolbox talk will need to be provided again by the appointed ECoW. The Site Manager(s) will be responsible for relaying information within the toolbox talk to all subsequent site staff during their initial site inductions.

11.4 Potential Licensed Sett Closures

- 11.4.1 If baseline conditions have altered and significant disturbance to badgers or damage to their setts cannot be avoided, one or both of the following options will be incorporated (subject the legislation applicable at the time):
- Working methods will be amended to avoid works which may impacts on the sett; and/or,
 - An appropriate licence is used to lawfully mitigate the potential damage/disturbance to a sett, via:
 - A mitigation licence obtained from Natural England before construction commences, or
 - Licensable actions are undertaken by a licenced consultant registered under Badger Class Licence WML-CL35.
- 11.4.2 Any newly-discovered sett should ideally be avoided by construction works if at all possible, under the advice of the ECoW. In the event that an active sett is to be unavoidably impacted or potential disturbance to the sett may occur as a result of construction activities, a mitigation licence from Natural England would likely be necessary to temporarily or permanently close the sett.
- 11.4.3 Works to badger setts can only be undertaken between July and November inclusive due to the possibility of dependent young being underground at other

times of year. Outside of this licence period no works affecting the sett would be permitted and a buffer zone free of potentially disturbing activities (i.e. noise, damage or vibration), as informed by the ECoW, would be required. Work in other parts of the Site, however, can continue as advised by the ECoW. It commonly can take up to six weeks for a licence application to be determined by Natural England, depending on the licence type being applied for.

11.5 Precautionary Approach to Excavations Left Overnight

- 11.5.1 It is likely that badgers (and other mammals) will move around within the Order Limits during the construction phase considering the open habitats present. Therefore, any pits or trenches dug during the construction phase (particularly during the cable installation works and use of HDD entry/exit pits) must have a means of escape placed in them overnight for trapped badgers (and other animals) to use, or be covered overnight if possible. Examples include rough sawn planks or earth ramps, positioned at a maximum of 45⁰ angle). Similarly, all open ducting and pipework left within any pits or trenches must be temporarily capped off overnight. The use of these measures will be periodically checked by the ECoW and will be the responsibility of the Site Manager(s) to implement otherwise unlawful harm to badgers and wild mammals may result.

12 Method Statement 11: Specific Measures for Invasive Non-Native Species

12.1 Objectives

- 12.1.1 The following invasive non-native species (INNS) listed within Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) have been recorded within the Order Limits:
- Giant hogweed *Aesculus hippocastanum* located in sub-Site 5a in five locations; and
 - Himalayan balsam *Impatiens glandulifera* located along the watercourses and lowland fen habitat in CRC7 and within a ditch in Site 9.
- 12.1.2 In addition, Japanese knotweed *Reynoutria japonica* stands are located outside of the Order Limits to the east of Site 3 in three locations;
- 12.1.3 The above-named INNS locations are provided within **Figure 3**.
- 12.1.4 It is considered that other invasive plant species could occur locally (and spread within the Order Limits), as well as other invasive animal species such as American signal crayfish *Pacifastacus leniusculus* (desk study suggests local presence in a tributary of the Hempnall Brook) which is potentially present within ditches and watercourses.
- 12.1.5 The objective of this Method Statement is to ensure that INNS are not released or allowed to escape into the wild, or inadvertently caused to spread (all of which may constitute an offence under the Wildlife & Countryside Act 1981, the Invasive Alien Species (Enforcement) Regulations 2014, and/or the Environmental Protection Act 1990) as a result of the construction phase of the Scheme.

12.2 Pre-Commencement INNS Search

- 12.2.1 Prior to any construction works commencing in the ECoW (or appointed suitably qualified Ecologists) will undertake a Site search to establish the spread of INNS and search for any areas that have become infested by INNS.
- 12.2.2 It is advised that this Site search is undertaken in the season when species can be reliably identified (May – October) between 6 and 12 months prior to construction commencing. Which will allow for site specific treatment/eradication measures to be designed and implemented/started under an INNS Management Plan as advised by a specialist invasive species treatment contractor.

- 12.2.3 The ECoW will actively look for INNS during all supervision, survey work and monitoring visits, and report their presence to the Site Manager(s) as appropriate.
- 12.2.4 All actions under a INNS Management Plan will be agreed with the Site Manager(s) and ECoW before being implemented.

12.3 Toolbox Talks

- 12.3.1 The presence of INNS will form part of the Ecological Toolbox Talk (as per Method Statement 1) and raise awareness with staff regarding the species present / most likely to be encountered so that early reporting and remediation work can take place.
- 12.3.2 In the event a change in Site Management personnel occurs during construction or a pause in works of a period of more than 30 consecutive days occurs, the toolbox talk will need to be provided again by the appointed ECoW. The Site Manager will be responsible for relaying information within the toolbox talk to all subsequent site staff during their initial site inductions.

12.4 Biosecurity Measures

- 12.4.1 In order to prevent the accidental spread of invasive non-native plant species (as well as pests, diseases and native but undesirable species) into the Order Limits, as well as between working areas; plant and wheel washing facilities will be provided and utilised when vehicles are moving into and between working areas. Plant and wheel washing will only be carried out in designated areas located at least 30m from any watercourse, surface drain or potential pollution pathway, and will be constructed on an impermeable base with a collecting sump to prevent the potential spreading of contaminated material.
- 12.4.2 Any construction personnel working alongside or within watercourses (for instance when open-cut trenching) will follow the 'check, clean, dry' guidance from the Non-Native Species Secretariat (NNSS)¹⁰; see below:
- **Check:** check all equipment, machinery and clothing after leaving the water for mud, aquatic animals or plant material. Remove anything you find and leave it at the Site;
 - **Clean:** clean everything thoroughly as soon as possible, paying attention to areas that are damp or hard to access. Use hot water if entirely possible; and
 - **Dry:** dry everything for as long as possible before using elsewhere as some invasive plants and animals can survive for extensive periods in damp conditions.

¹⁰ <https://www.nonnativespecies.org/what-can-i-do/check-clean-dry>

- 12.4.3 Wet or dry mud will be removed from footwear, clothing and equipment before leaving site. Footwear/clothing and equipment that has come into contact with water will be disinfected with a broad-spectrum disinfectant. This treatment will be repeated whenever machinery, equipment, or PPE is transferred to another area of the Site.

12.5 Precautionary Approach to Works and INNS Management

- 12.5.1 Prior to works commencing, existing INNS control/avoidance actions will be agreed with the Site Manager(s) and ECoW before being implemented. All areas of infestation will be subject to a species-specific buffer zone, surrounded by BPF and remediation / control measures as advised by a specialist Invasive Species Contractor. All actions under a INNS Management Plan (which will be tailored to the specific INNS and the relevant work operations) will be agreed with the Site Manager(s) and ECoW before being implemented.
- 12.5.2 In the event that new areas of INNS are encountered by staff during the construction phase, contractors will be advised to leave them in-situ. The Site Manager will ensure that the ECoW is contacted immediately, and any associated works in the area within which the invasive species was found must temporarily cease pending further advice from the ECoW and specialist invasive species contractors. The new area of infestation will be included within the INNS Management Plan (see above) and remediation/control actions agreed with the Site Manager(s) and ECoW before being implemented.
- 12.5.3 As it is an offence to release into the wild or cause to grow any INNS, works will be altered to avoid them in the first instance. Following from this, appropriate treatment will ensue, under the INNS Management Plan, remediation and control work carried out by a specialist Invasive Species Contractor would be required as all parts of invasive plant species are considered contaminated waste under the Environmental Protection Act 1990. Until this occurs, the area will be clearly marked out and delineated with BPF, so as to not contribute to its spread locally.
- 12.5.4 In the unlikely event that soil or other waste contaminated with INNS material (classified as controlled waste) must be removed from the Site, this will be disposed of at a licensed landfill site or otherwise suitable disposal site, in consultation with the Environment Agency. The specialist Invasive Species Contractor will provide advice on the safe disposal of material as appropriate.
- 12.5.5 A detailed log of any INNS sightings within the Order Limits will be kept by the ECoW and Site Manager(s) and will be maintained for the duration of the construction phase. Details of any remedial actions undertaken will also be kept. This log will be made available to the Environment Agency and Local Planning Authority as required.

13 Method Statement 12 Construction-Phase Monitoring

13.1 Objectives

- 13.1.1 To ensure satisfactory achievement of all Method Statements and compliance with all relevant DCO requirements, ecological legislation and policy, periodic monitoring of construction activities and protective measures will be undertaken.

13.2 Monitoring

- 13.2.1 Regular (weekly) inspections of the Site(s) and immediate surroundings during the Construction Phase will be undertaken by the Site Environmental Manager to monitor the integrity of the BPF as well as to look for any signs of silt deposition, dust deposition, flooding, runoff and litter arising from within the Order Limits which could impact off-site habitats. This inspection will be recorded within a logbook to be made available to the Local Planning Authority (and other Statutory bodies) upon request.
- 13.2.2 Remedial action which may be required as soon as an issue is identified by the Site Environmental Manager may include temporarily ceasing work, arranging litter picking, additional site hoarding, increased water spraying, and increased waste collection.
- 13.2.3 At least every month during the Construction Phase, the ECoW will inspect all active working areas (where relevant) within the Order Limits to monitor compliance with the PSMS. This will include checking the following:
- Correct installation / maintenance of BPF;
 - Safeguarding of retained habitats;
 - Visual inspection of aquatic habitats (watercourse/ditch/pond) conditions;
 - Implementation and adherence to precautionary working methods within GCN Working Areas;
 - Implementation and adherence to the INNS Management Plan
 - Potential requirement for nesting bird monitoring for legal compliance;
 - Adherence to lighting restrictions; and
 - Status of badger activity (existing protection measures and any new activity).

- 13.2.4 Following these inspections, the ECoW will discuss monitoring outcomes with the Site Manager(s) and provide a written proforma of findings identifying any remedial actions and timescales for actions to be implemented.
- 13.2.5 The ECoW (and appropriately qualified named assistants) will also be available on an “on call” basis during the construction period.

13.3 Reporting

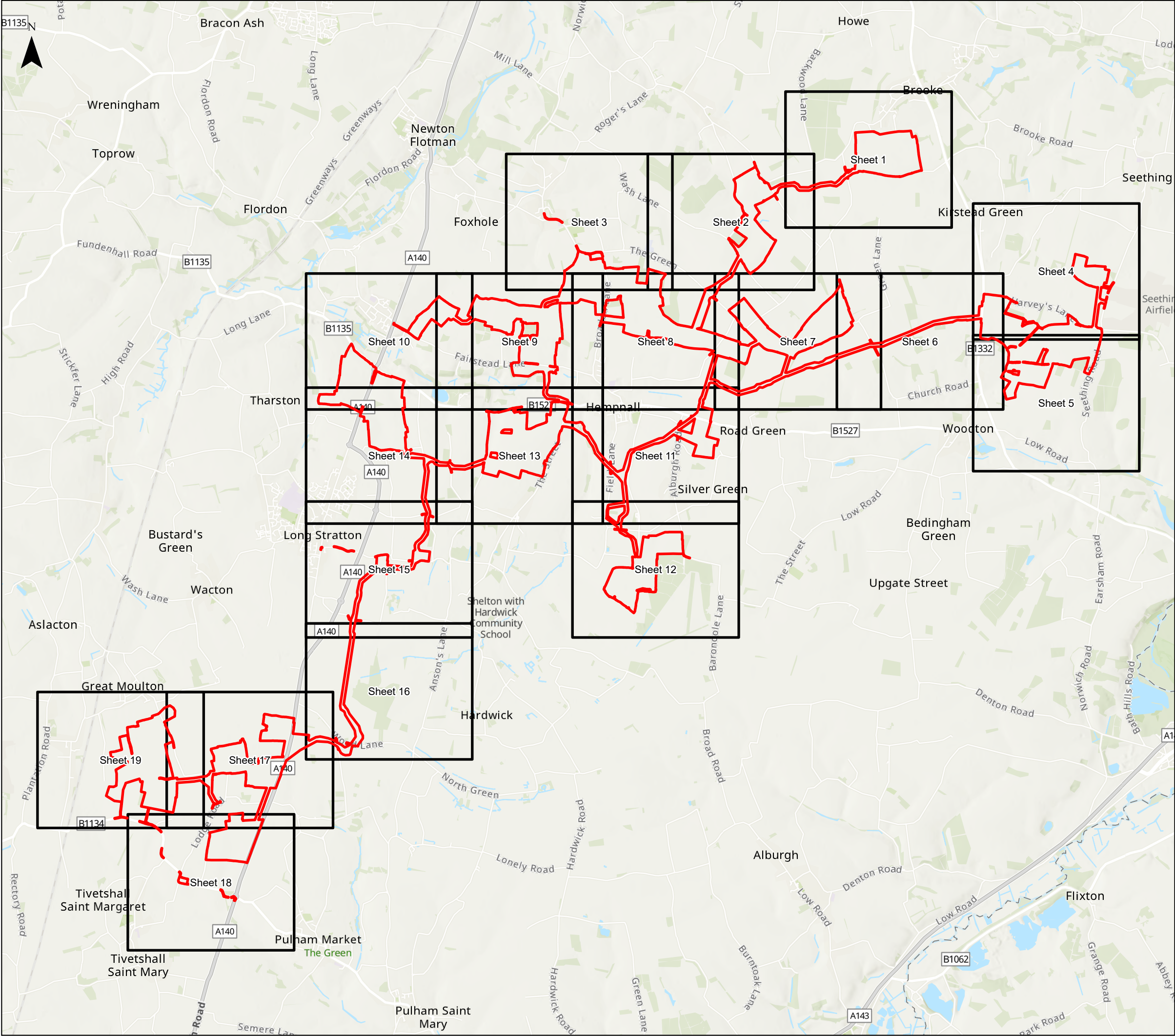
- 13.3.1 A quarterly tabular report will be prepared by the ECoW, which will be made available to the Local Planning Authority (and other statutory bodies) upon request. The report will include a detailed log of monitoring activities by the Site Environmental Manager and ECoW. It will detail any breaches of the PSMS and the associated remedial steps taken.

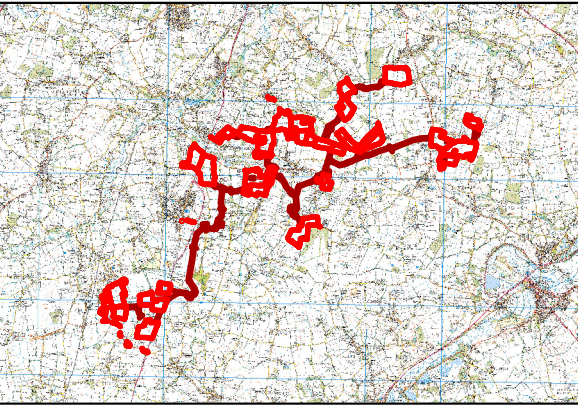
14 Figures

Figure 1: Great Crested Newt Mitigation Strategy

Figure 2: Skylark Mitigation Strategy

Figure 3: Invasive Non-Native Species Recorded Locations (2024 and 2025)





Legend

- Order Limits
- Sheet Index

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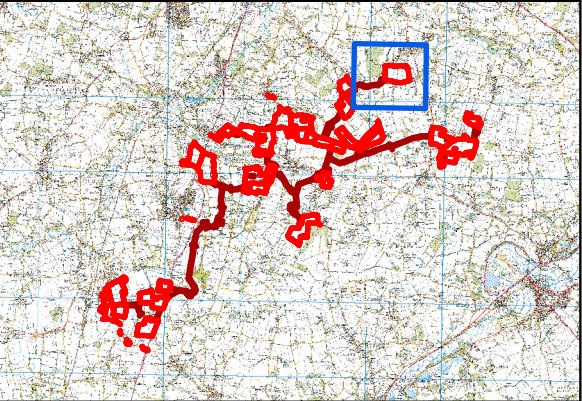
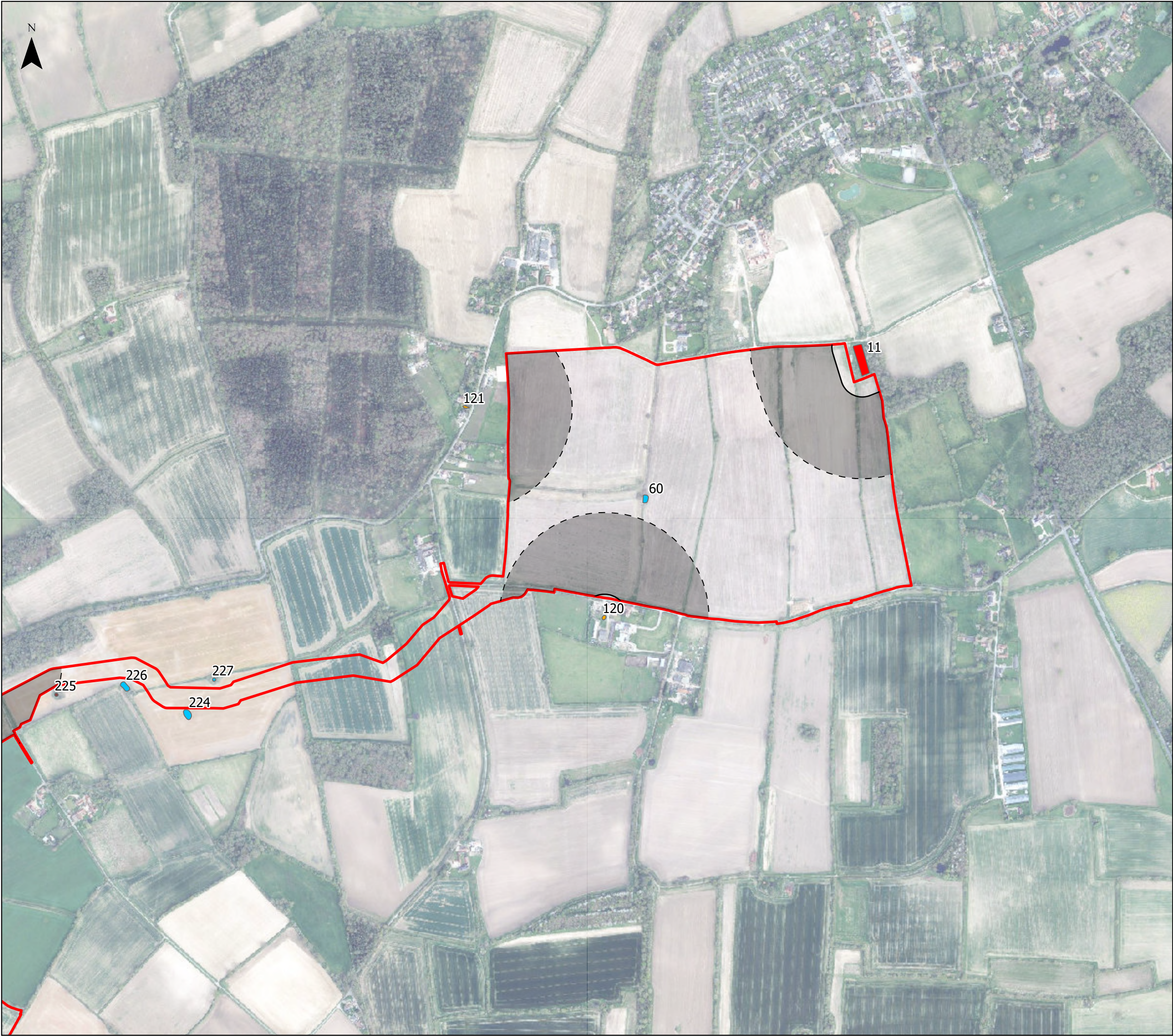
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Ref: Appendix 8.10	Date: 8/17/2026
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Figure 1: Great Crested Newt Method Statement Overview

Revision 2





- Legend**
- Order Limits
 - Dry Ponds
 - Inconclusive GCN results pond (precautionary positive approach)
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 - GCN Working Areas

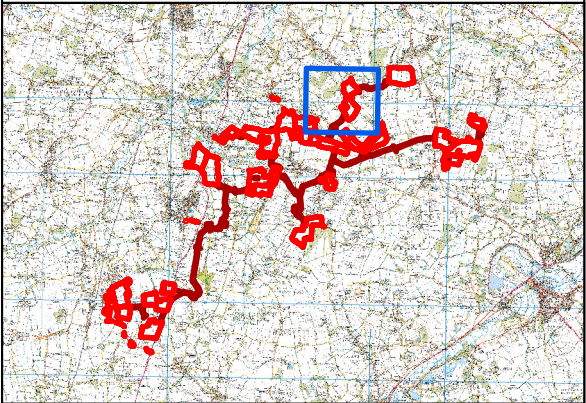
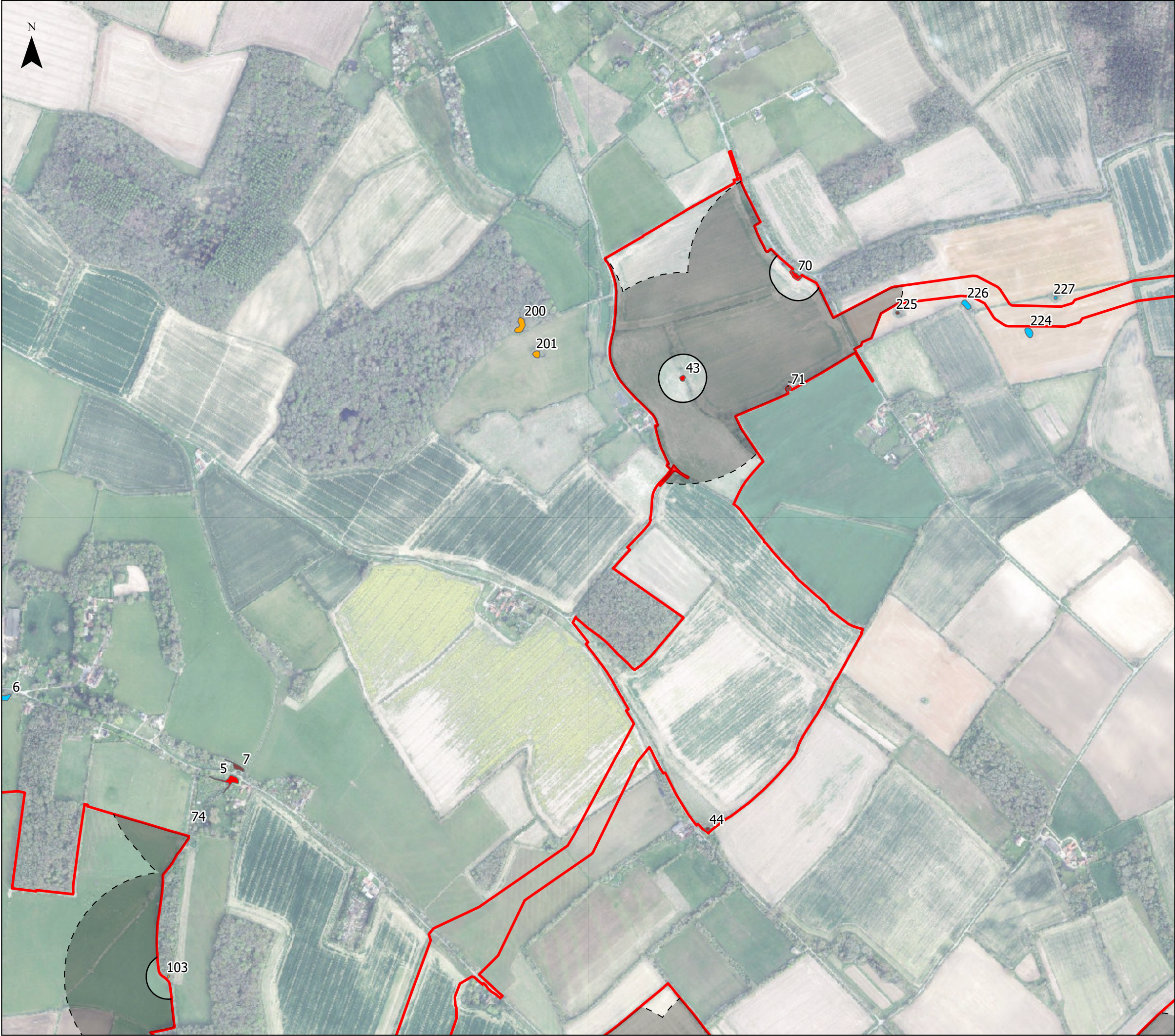
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Ref: Appendix 8.10	Date: 8/17/2026
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 1 of 19
Revision 2



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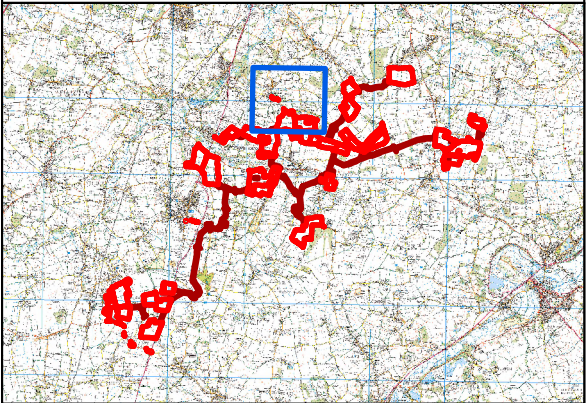
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Ref: Appendix 8.10	Date: 8/17/2026
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 2 of 19
Revision 2



Legend

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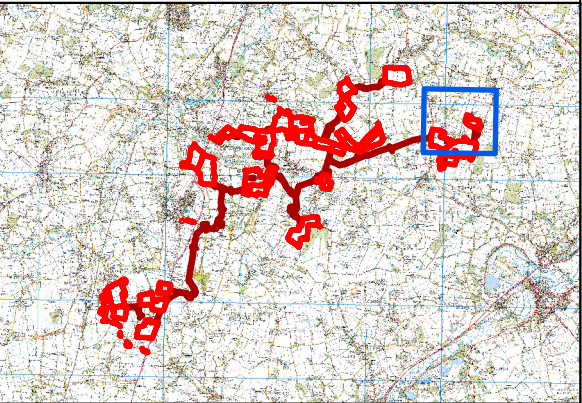
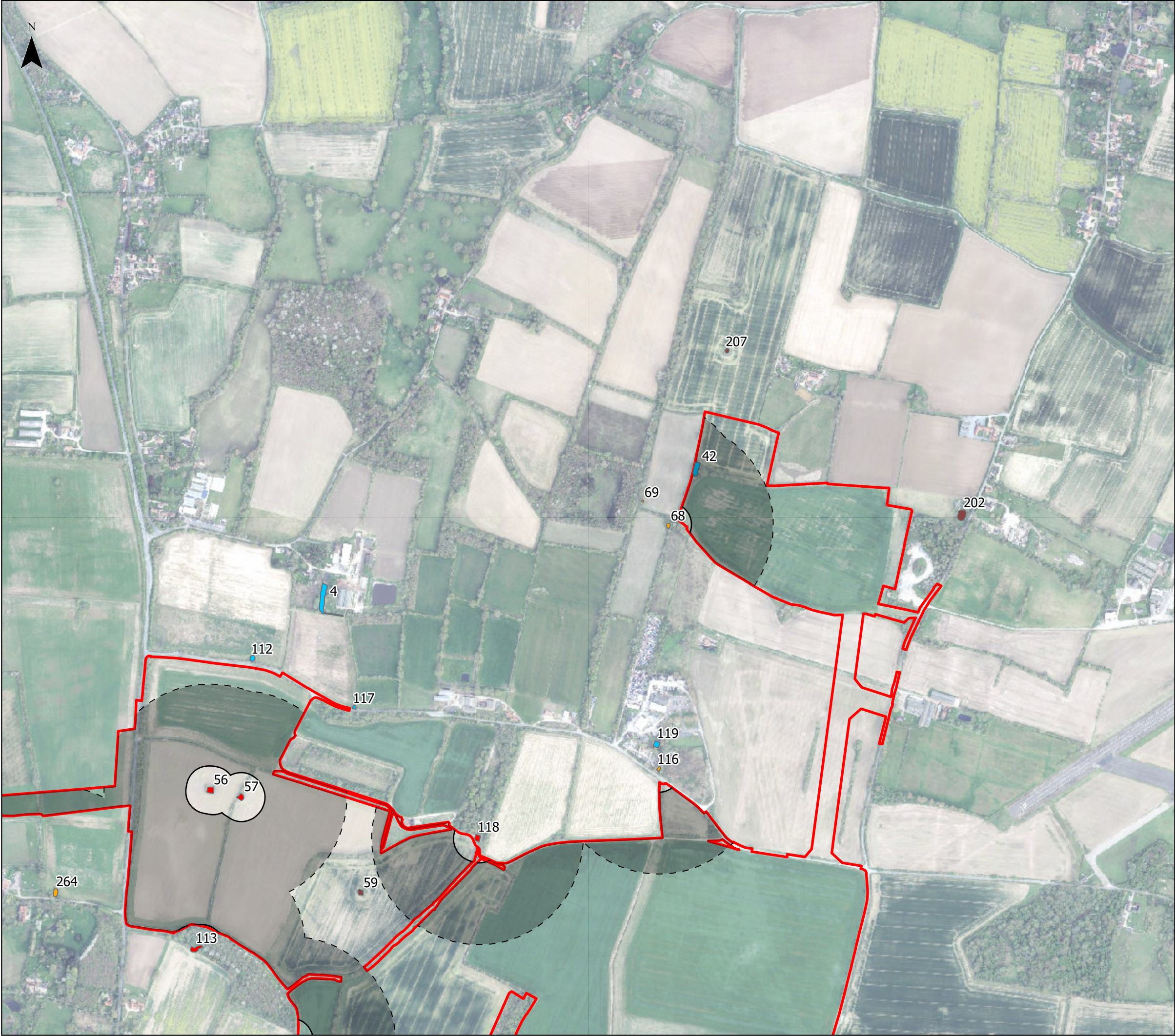
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**Figure 1: Great Crested Newt Method Statement
Figure**

Sheet 3 of 19
Revision 2



Legend

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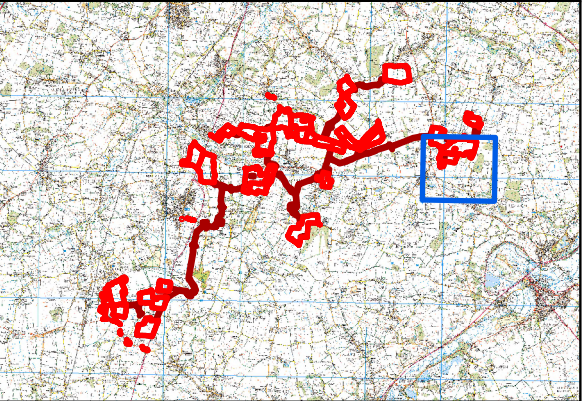
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 4 of 19
Revision 2



Legend

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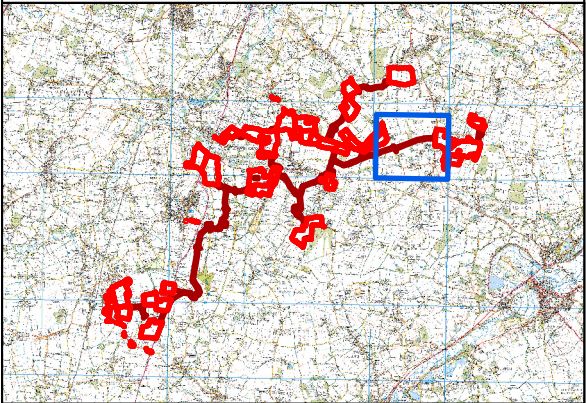
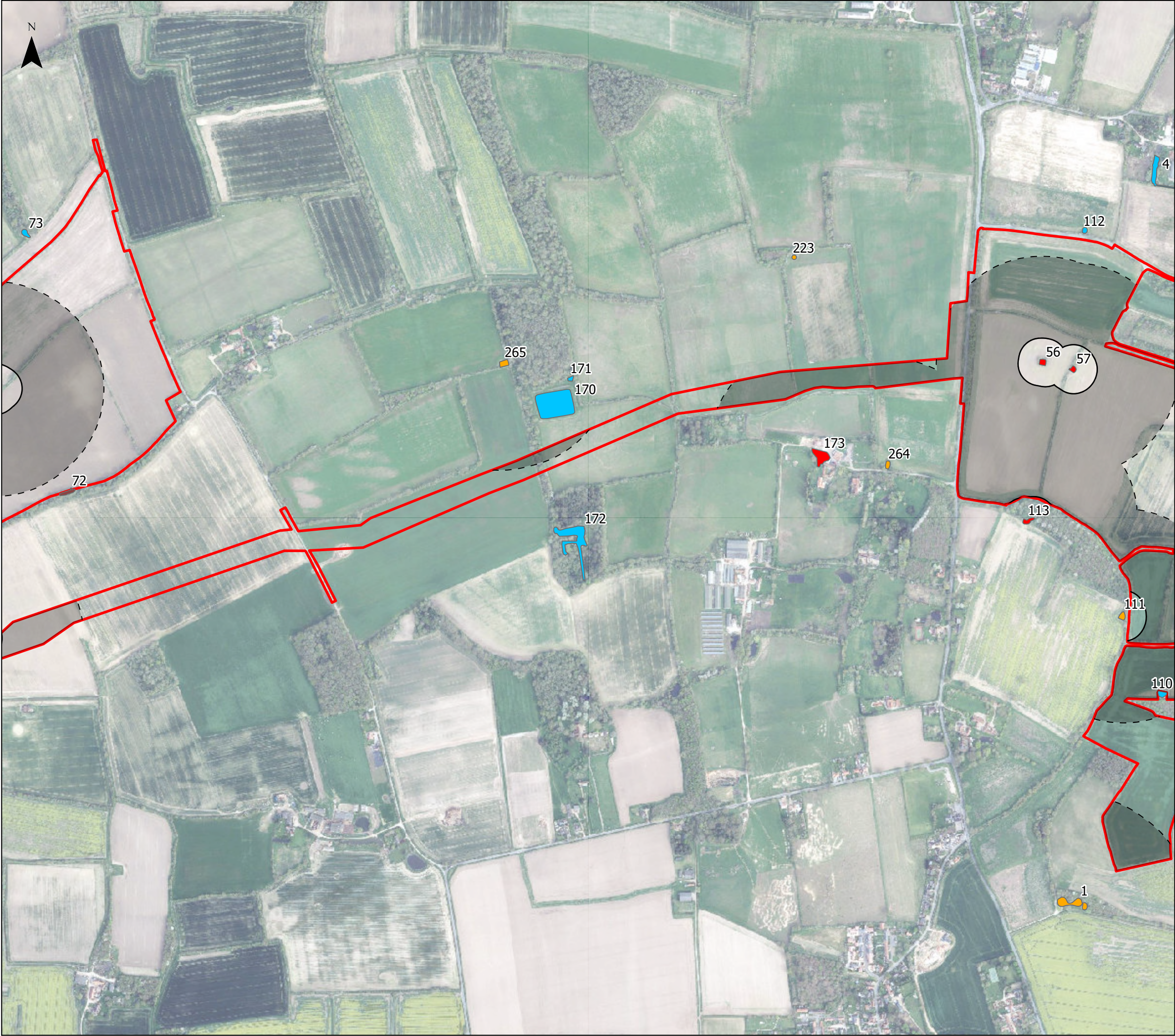
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**Figure 1: Great Crested Newt Method Statement
Figure**

Sheet 5 of 19
Revision 2



- Legend**
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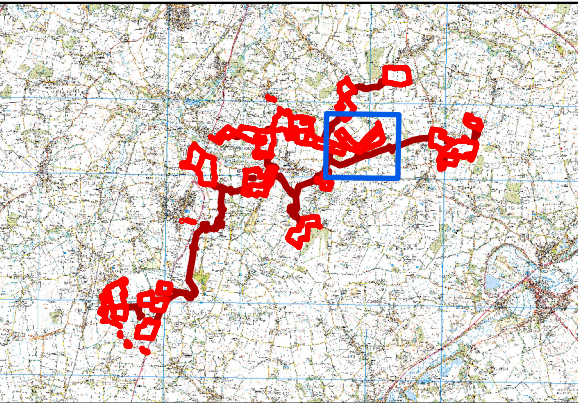
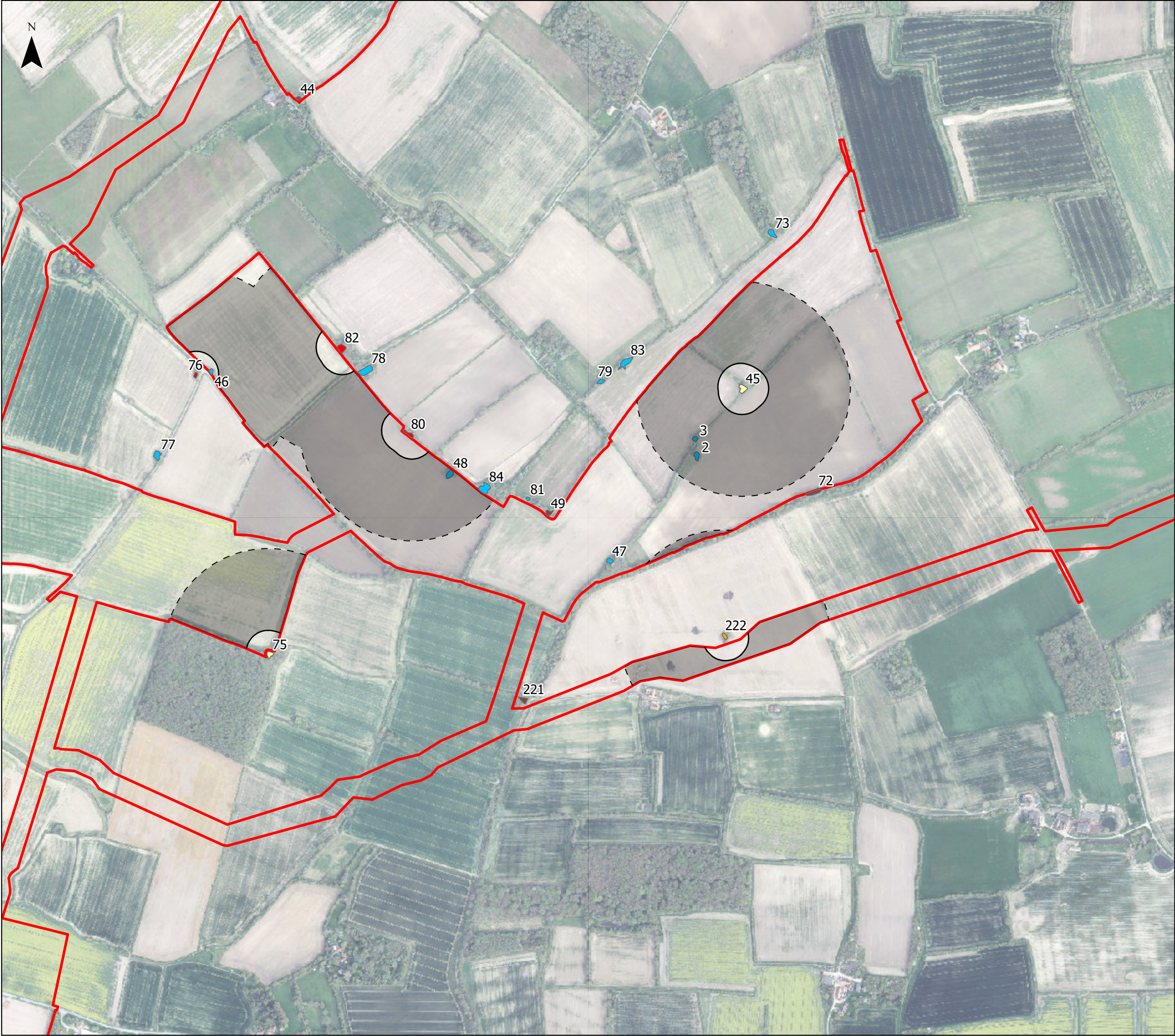
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 6 of 19
Revision 2



Legend

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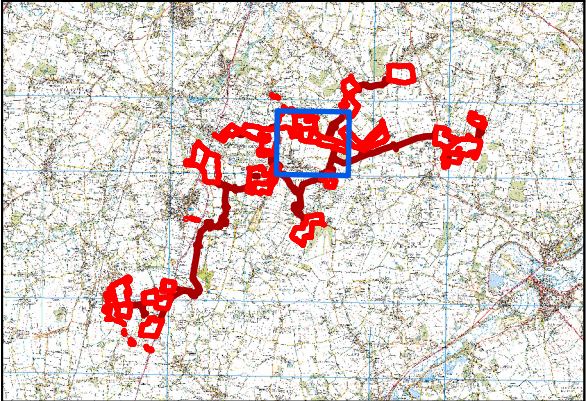
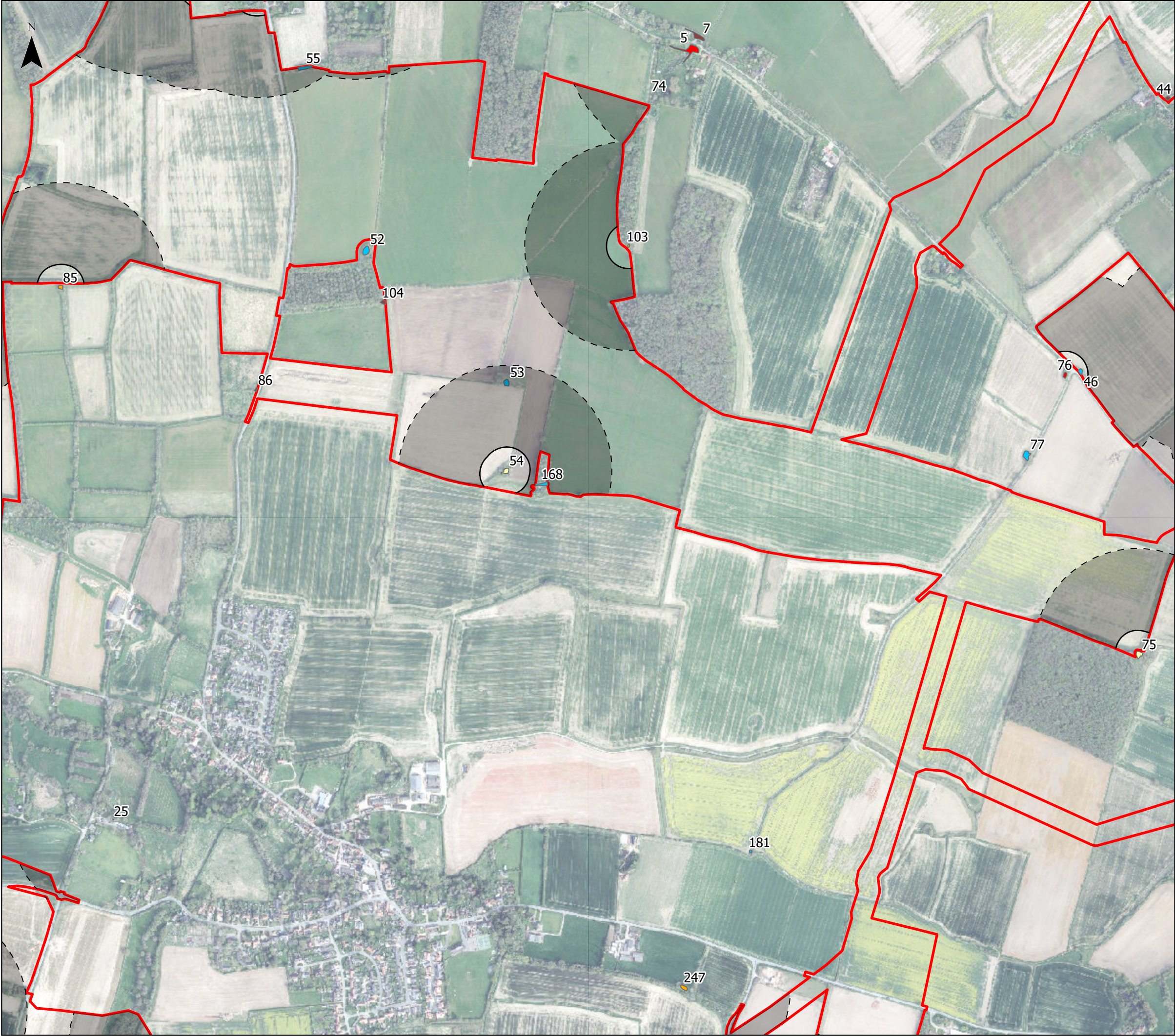
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**Figure 1: Great Crested Newt Method Statement
Figure**

Sheet 7 of 19
Revision 2



- Legend**
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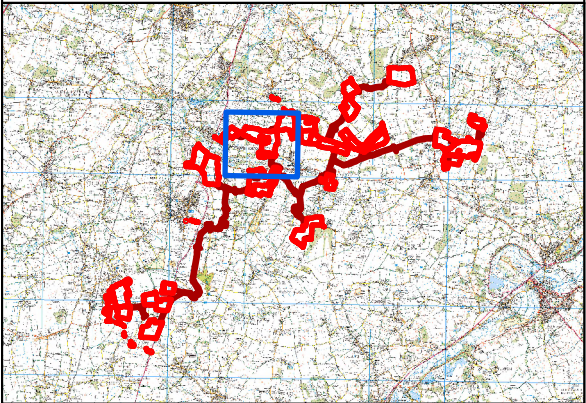
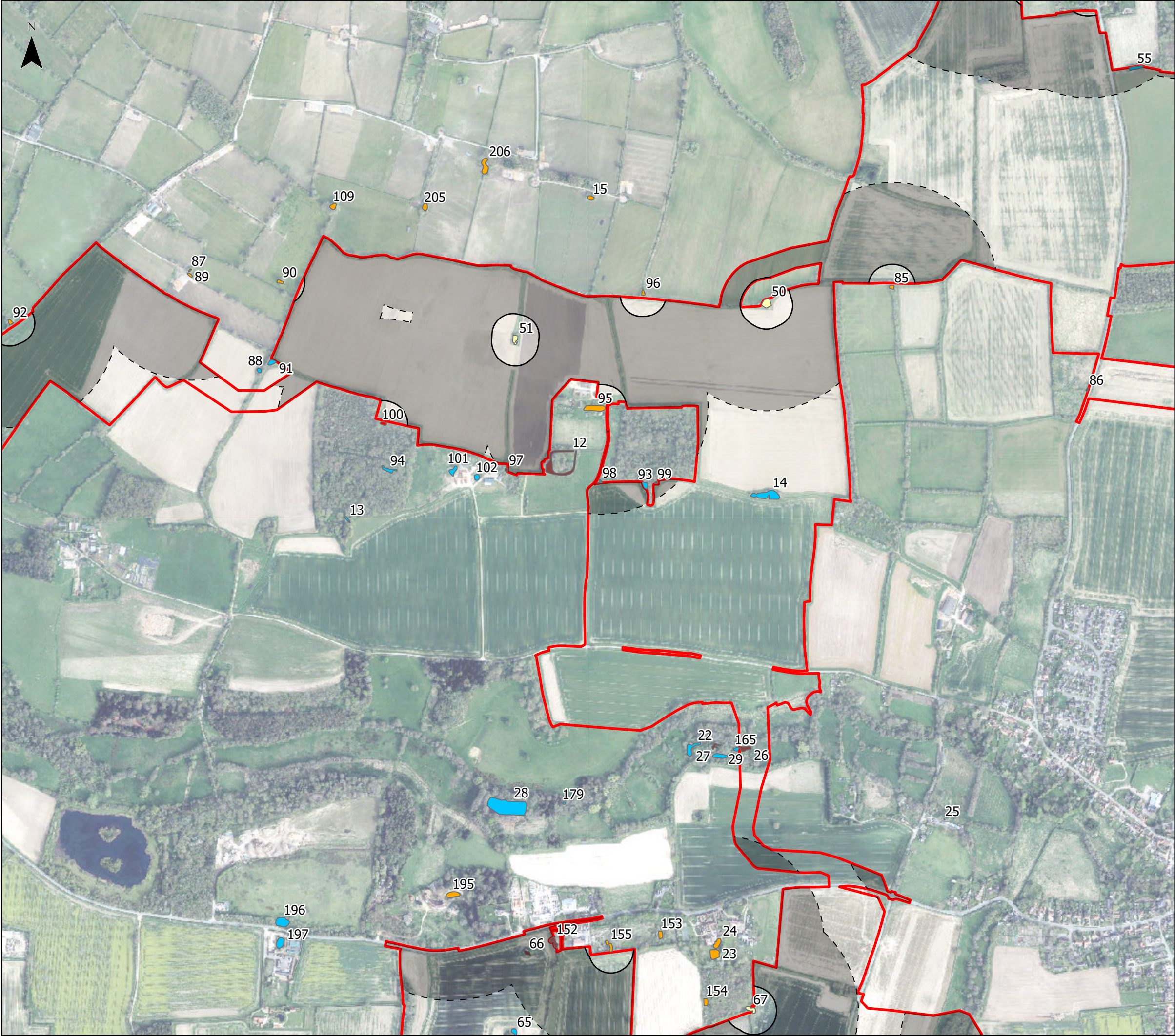
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 8 of 19
Revision 2



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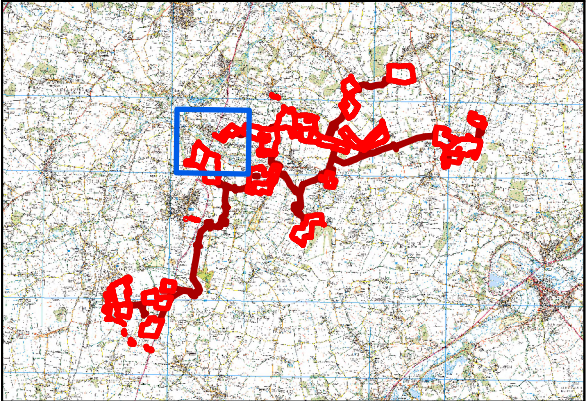
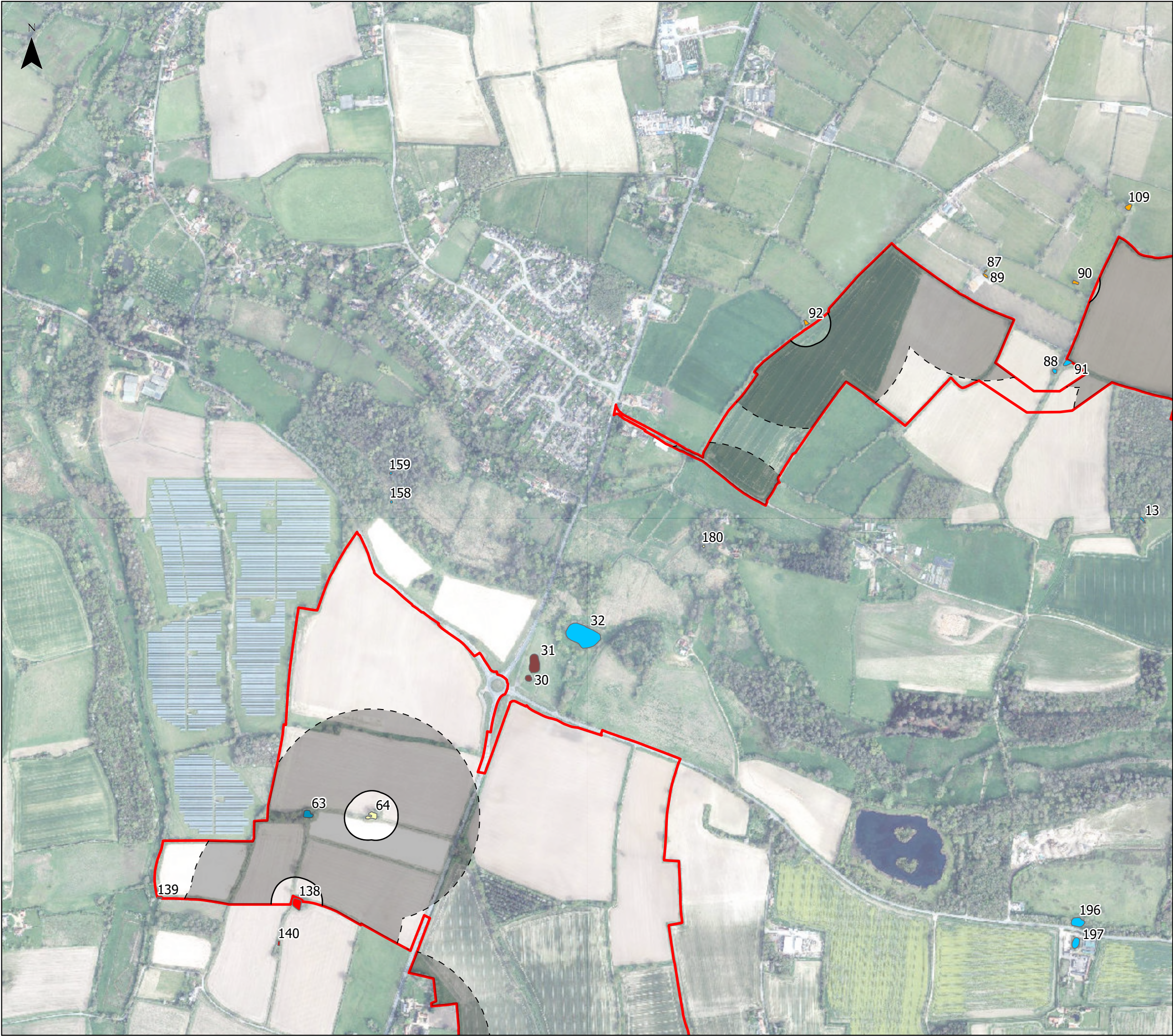
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 9 of 19
Revision 2



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- Order Limits
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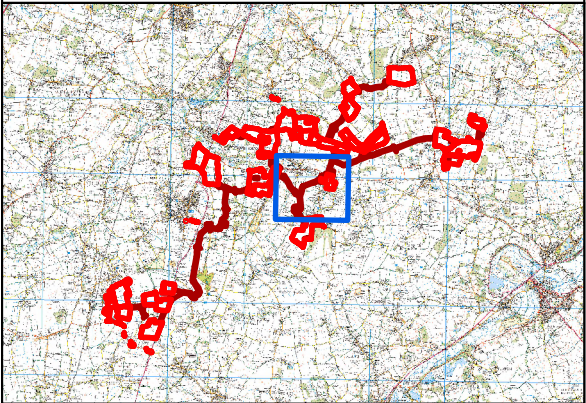
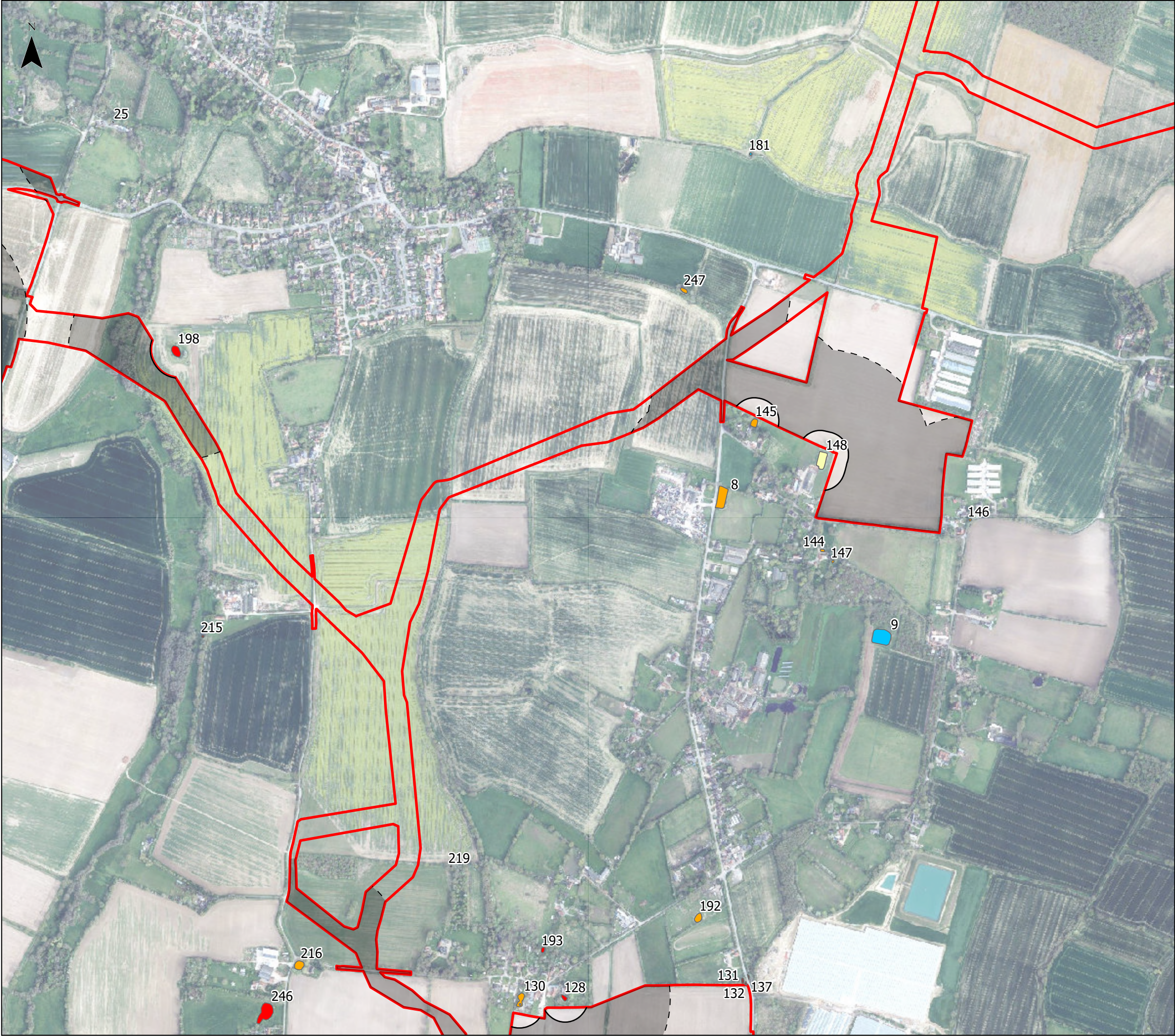
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**Figure 1: Great Crested Newt Method Statement
Figure**

Sheet 10 of 19
Revision 2



Legend

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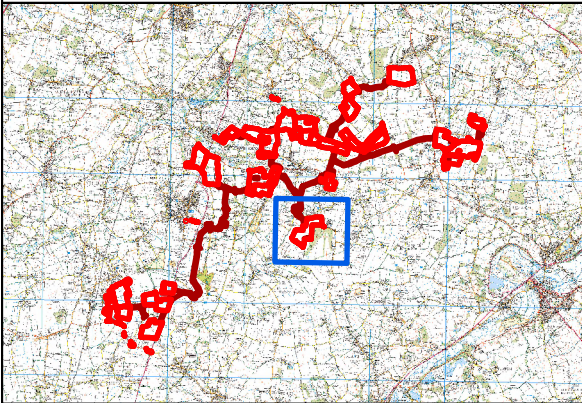
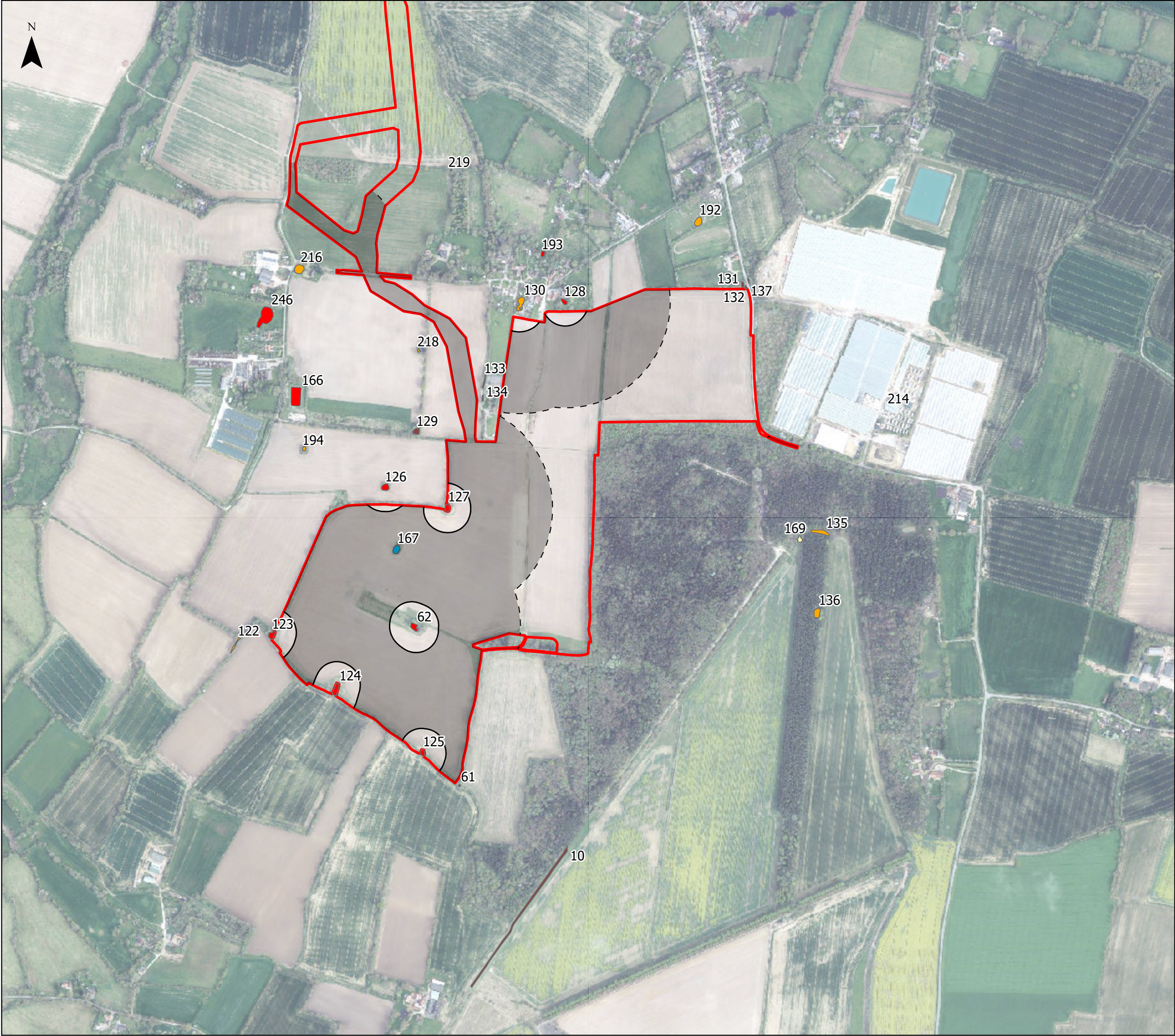
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 11 of 19
Revision 2



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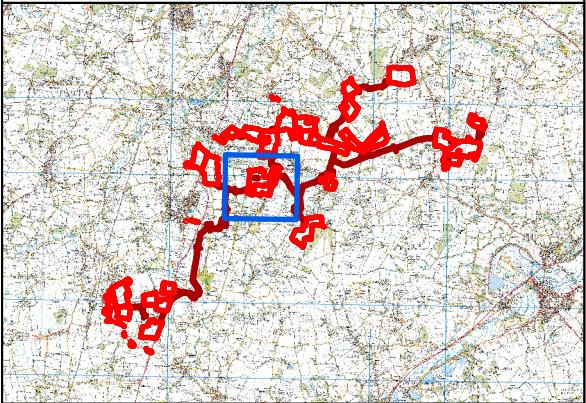
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 12 of 19
Revision 2



Legend

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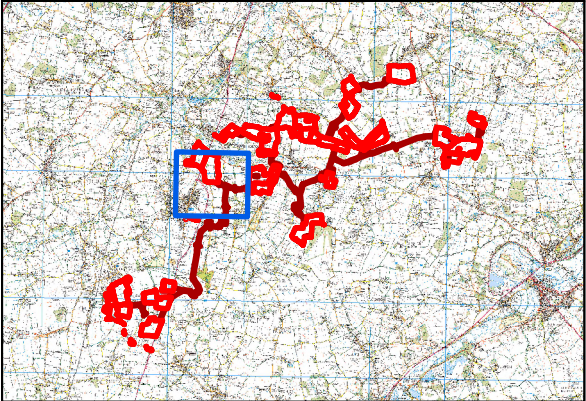
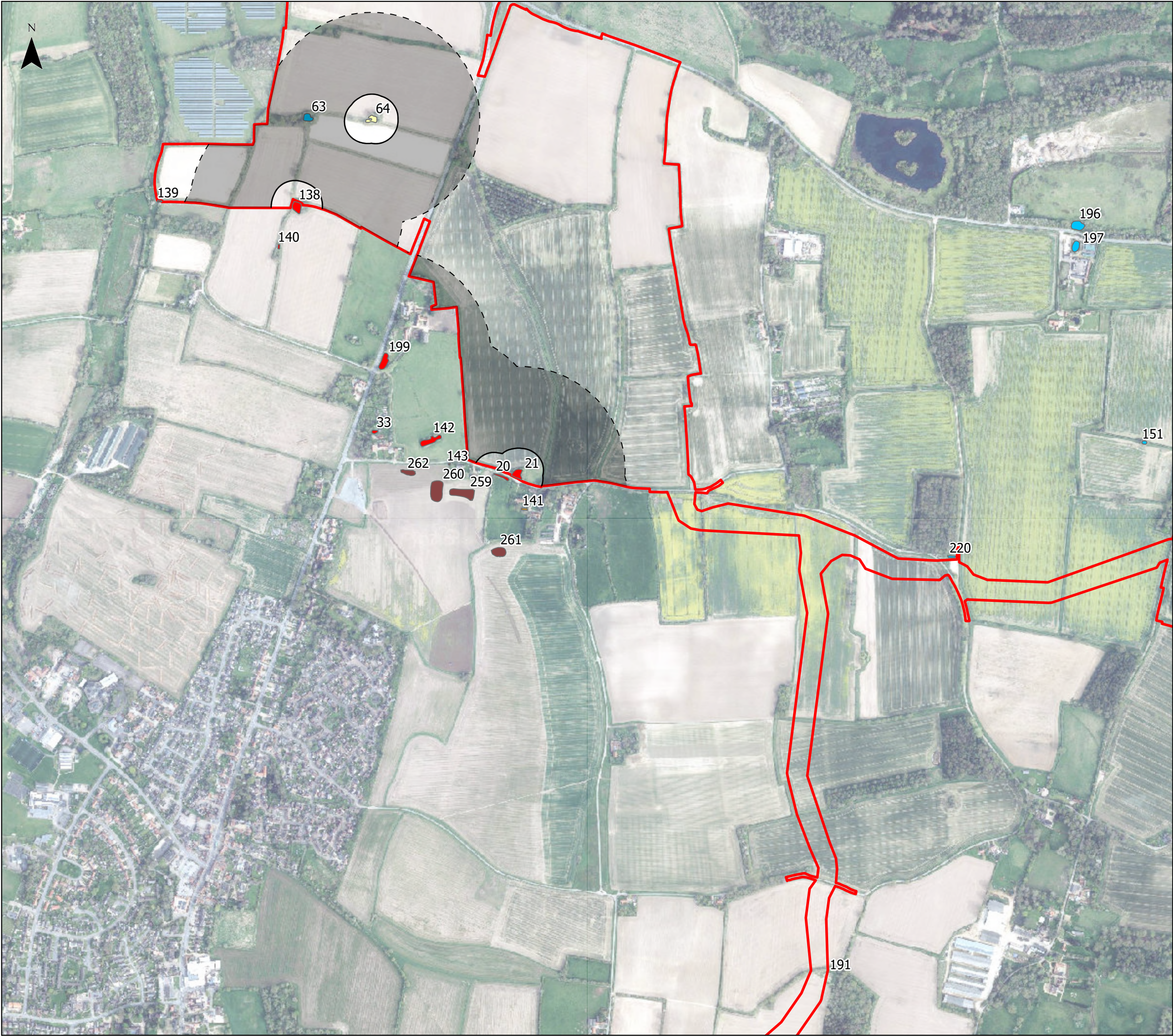
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 13 of 19
Revision 2



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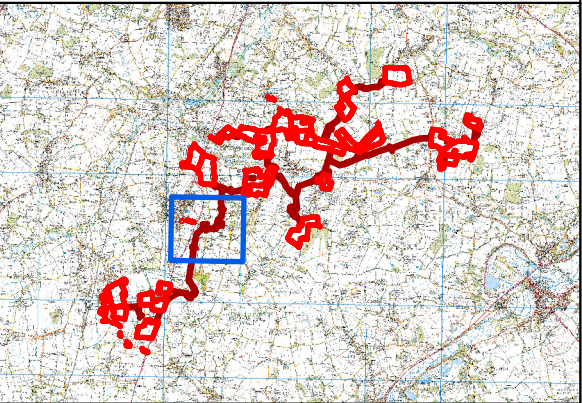
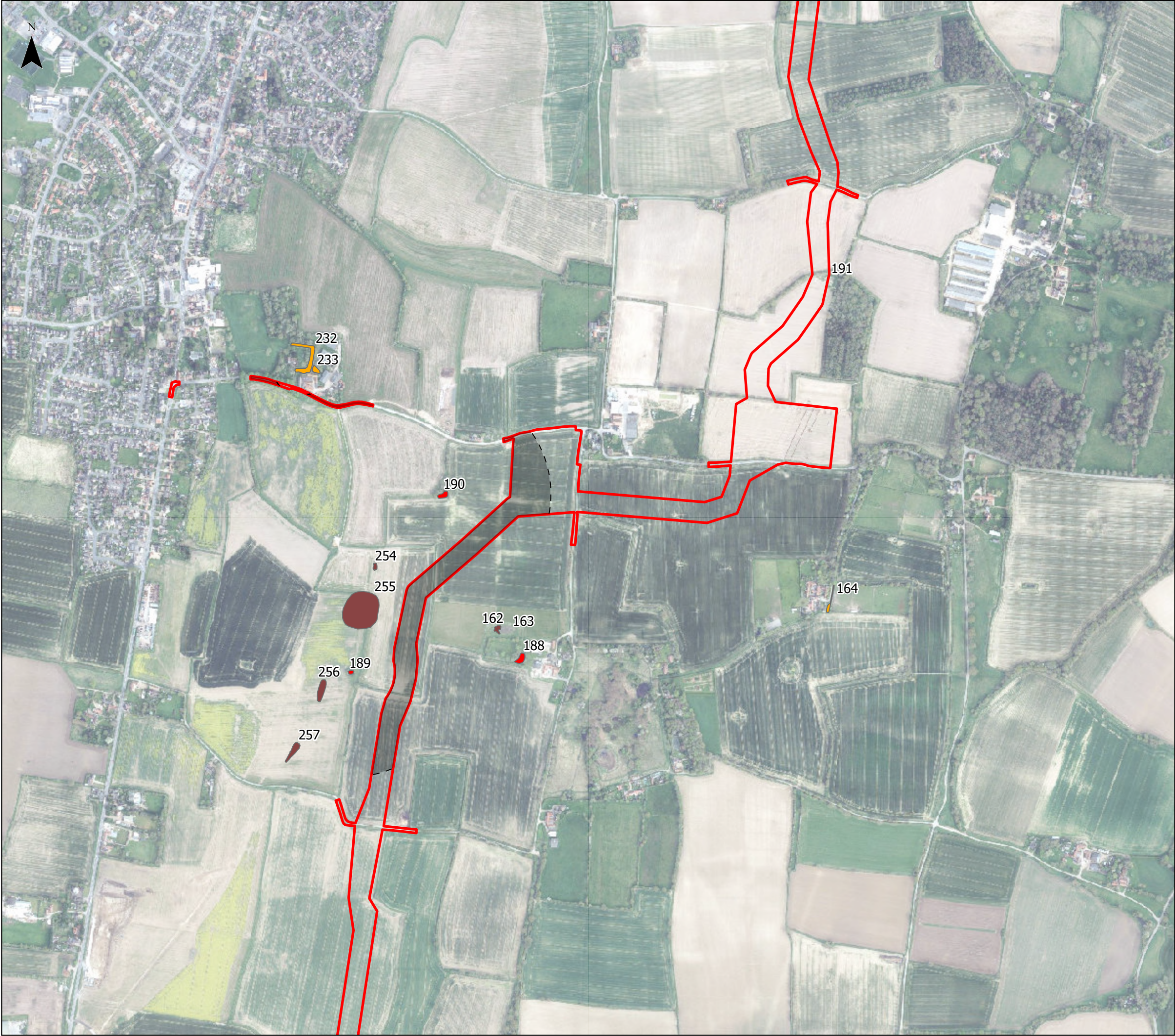
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 14 of 19
Revision 2



Legend

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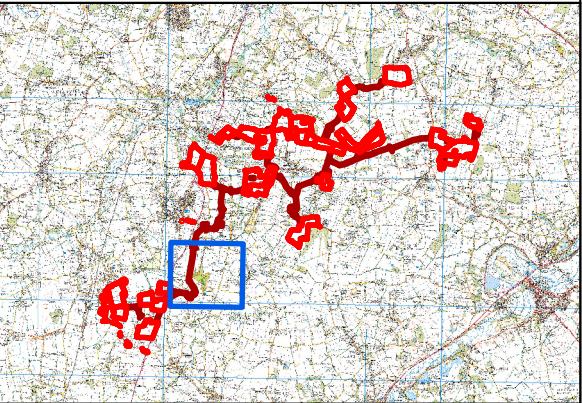
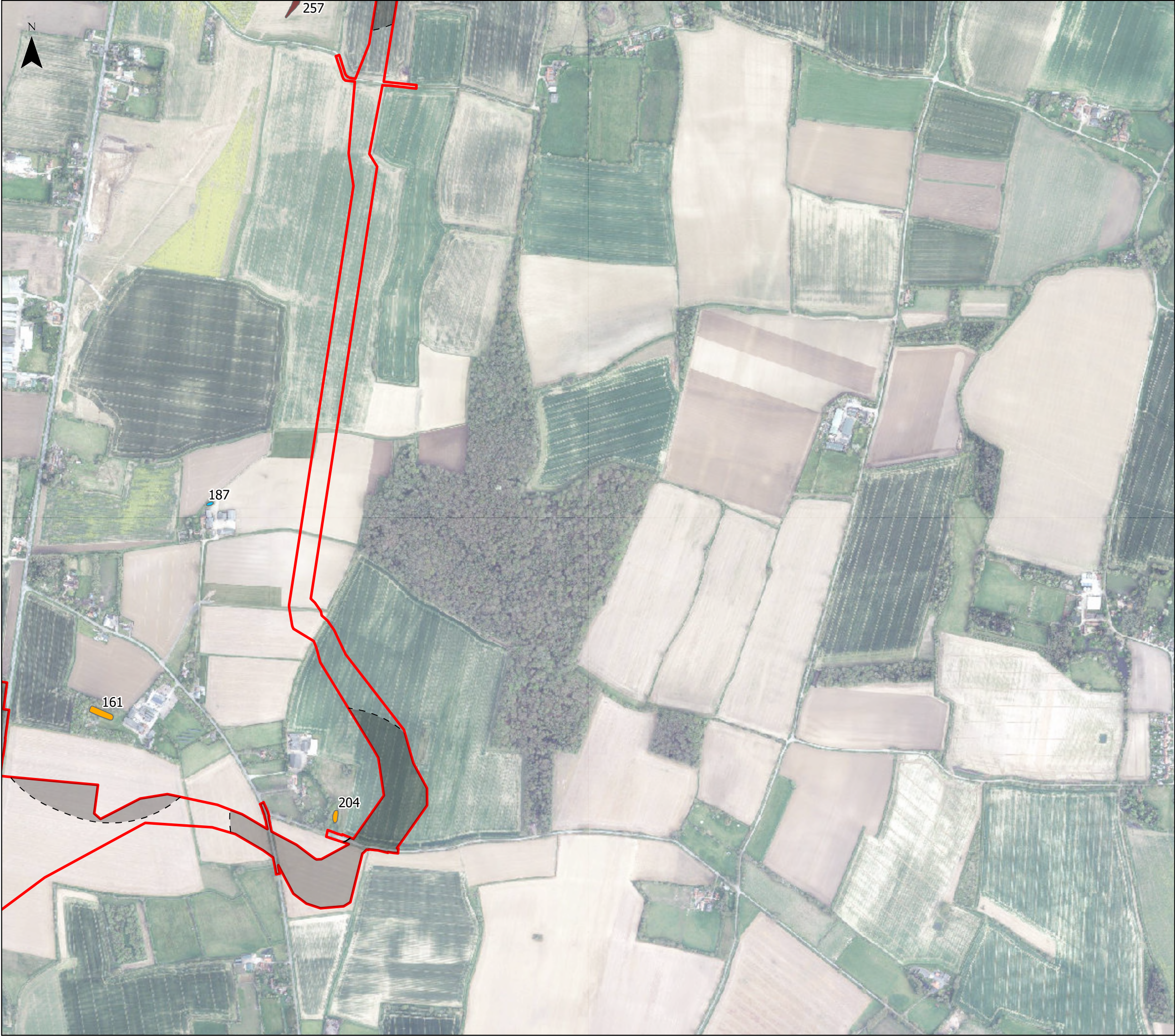
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**Figure 1: Great Crested Newt Method Statement
Figure**

Sheet 15 of 19
Revision 2



Legend

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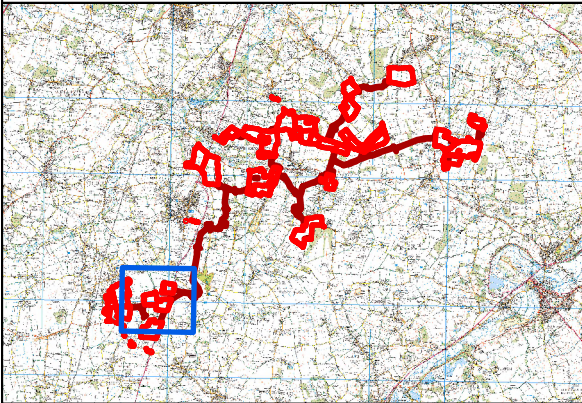
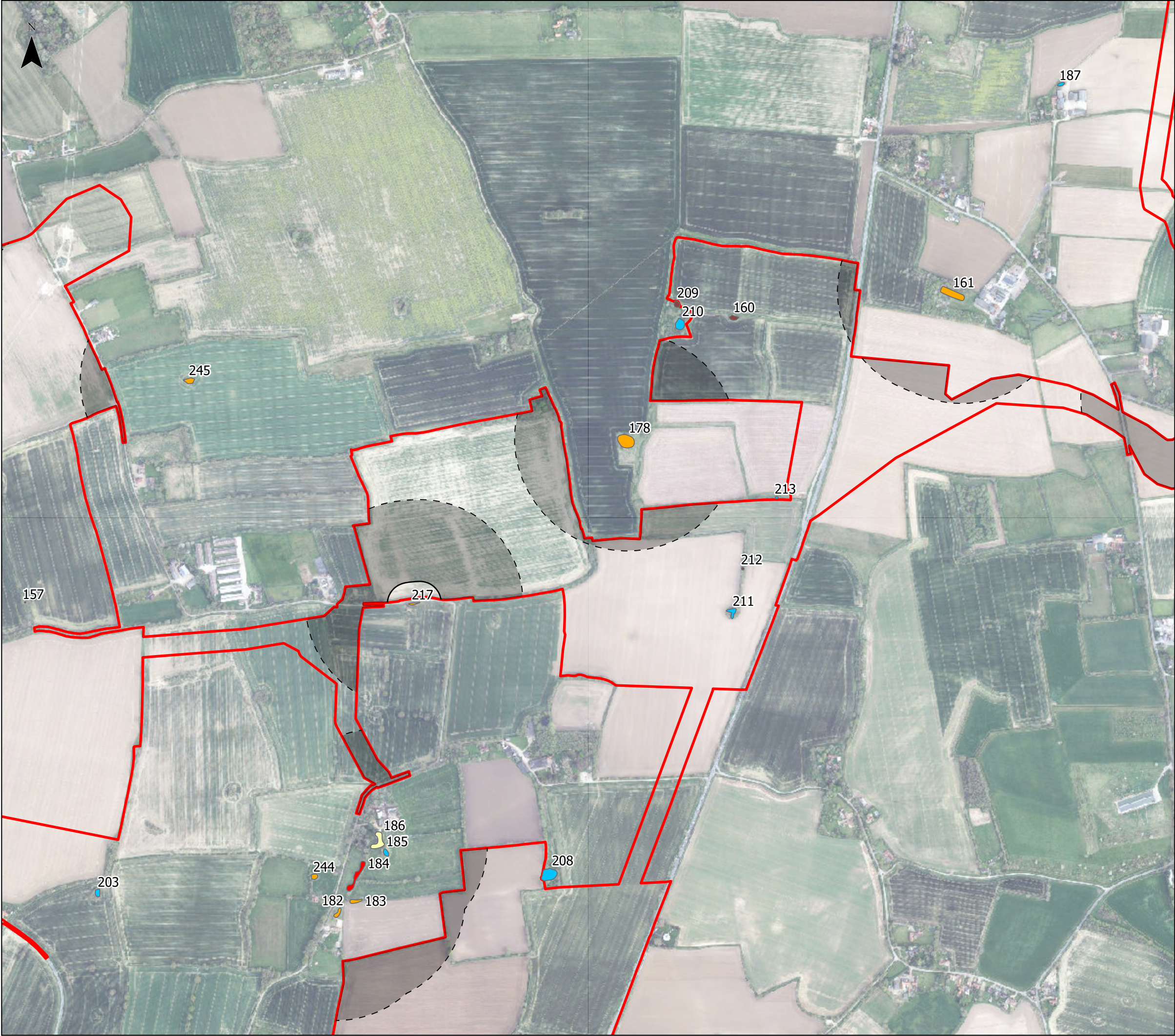
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**Figure 1: Great Crested Newt Method Statement
Figure**

Sheet 16 of 19
Revision 2



Legend

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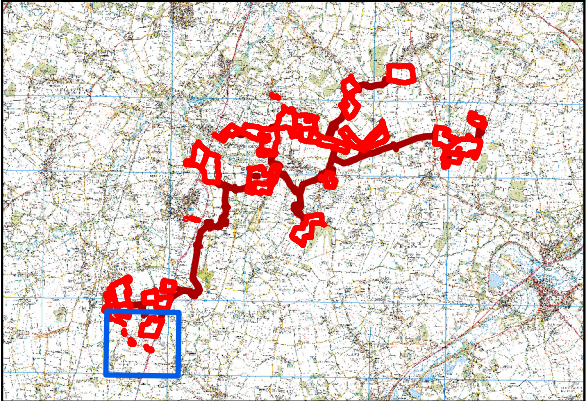
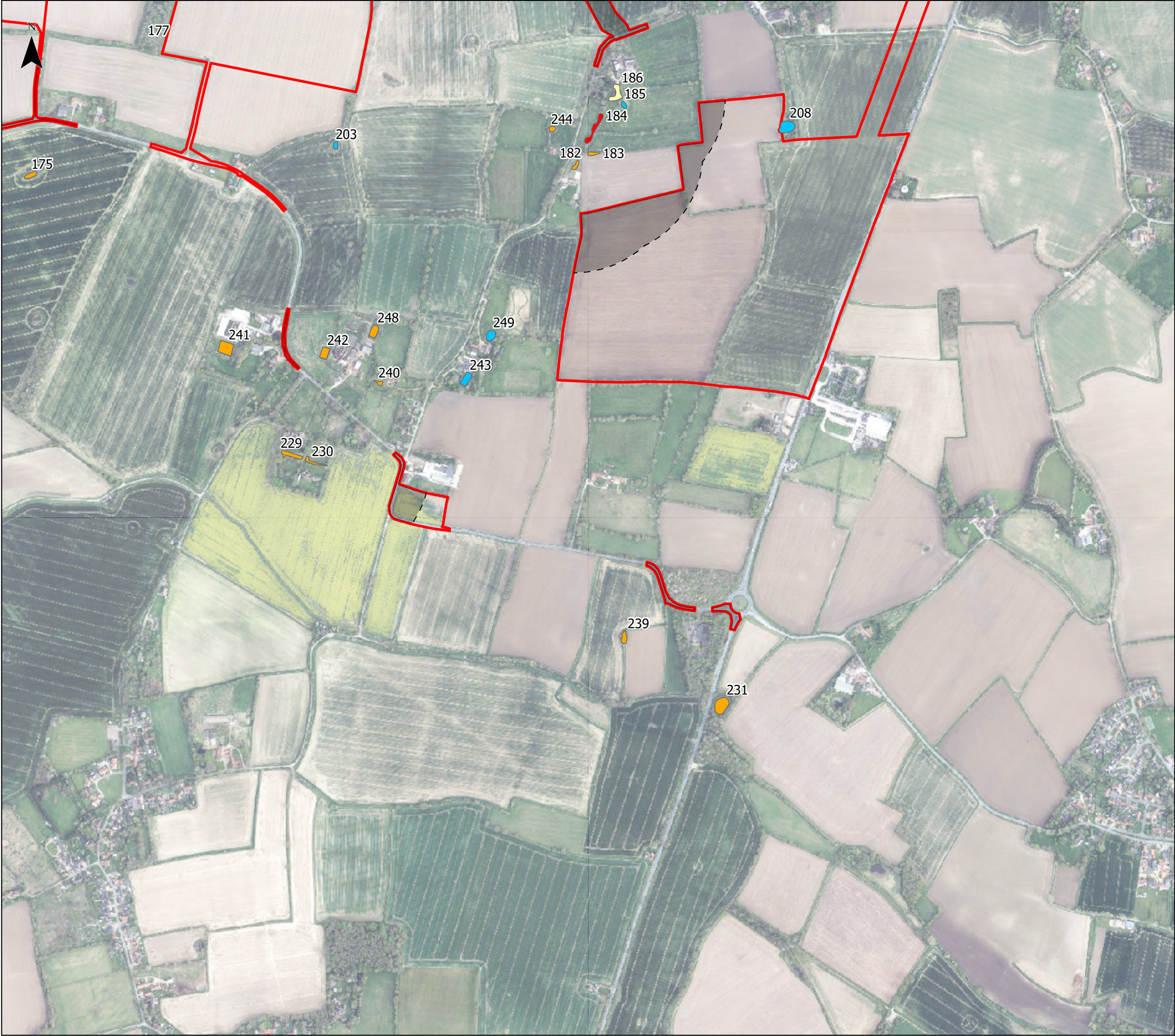
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**Figure 1: Great Crested Newt Method Statement
Figure**

Sheet 17 of 19
Revision 2



- Legend**
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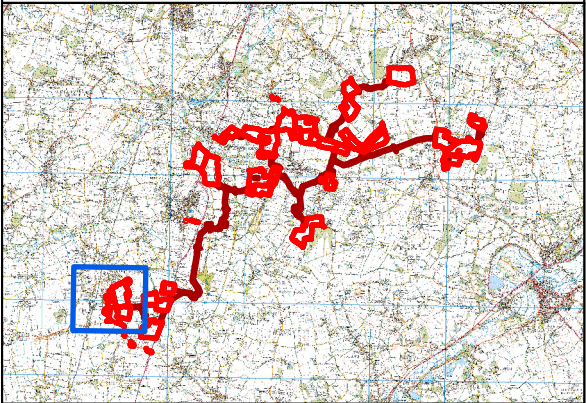
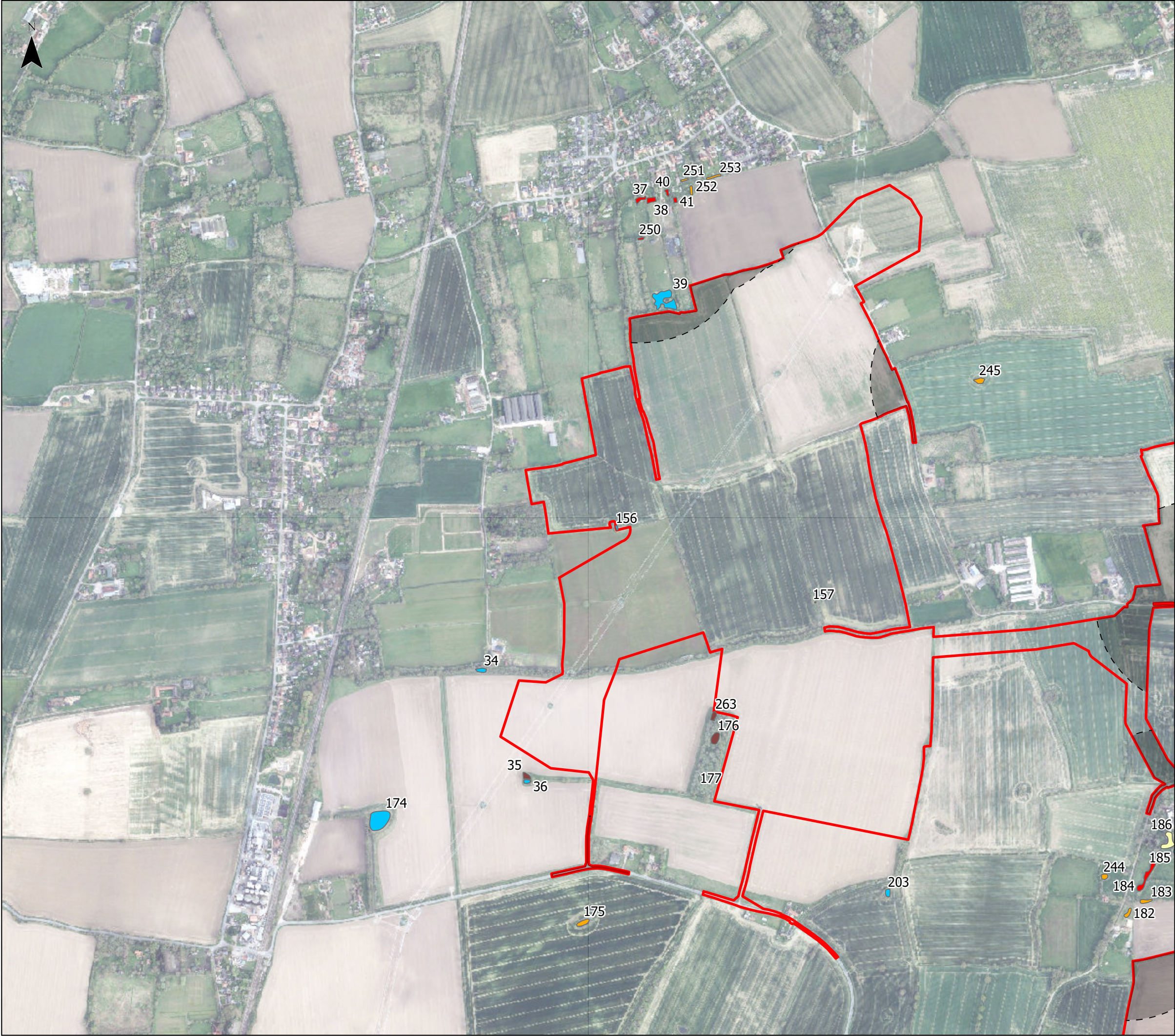
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Figure 1: Great Crested Newt Method Statement
Figure

Sheet 18 of 19
Revision 2



- Legend**
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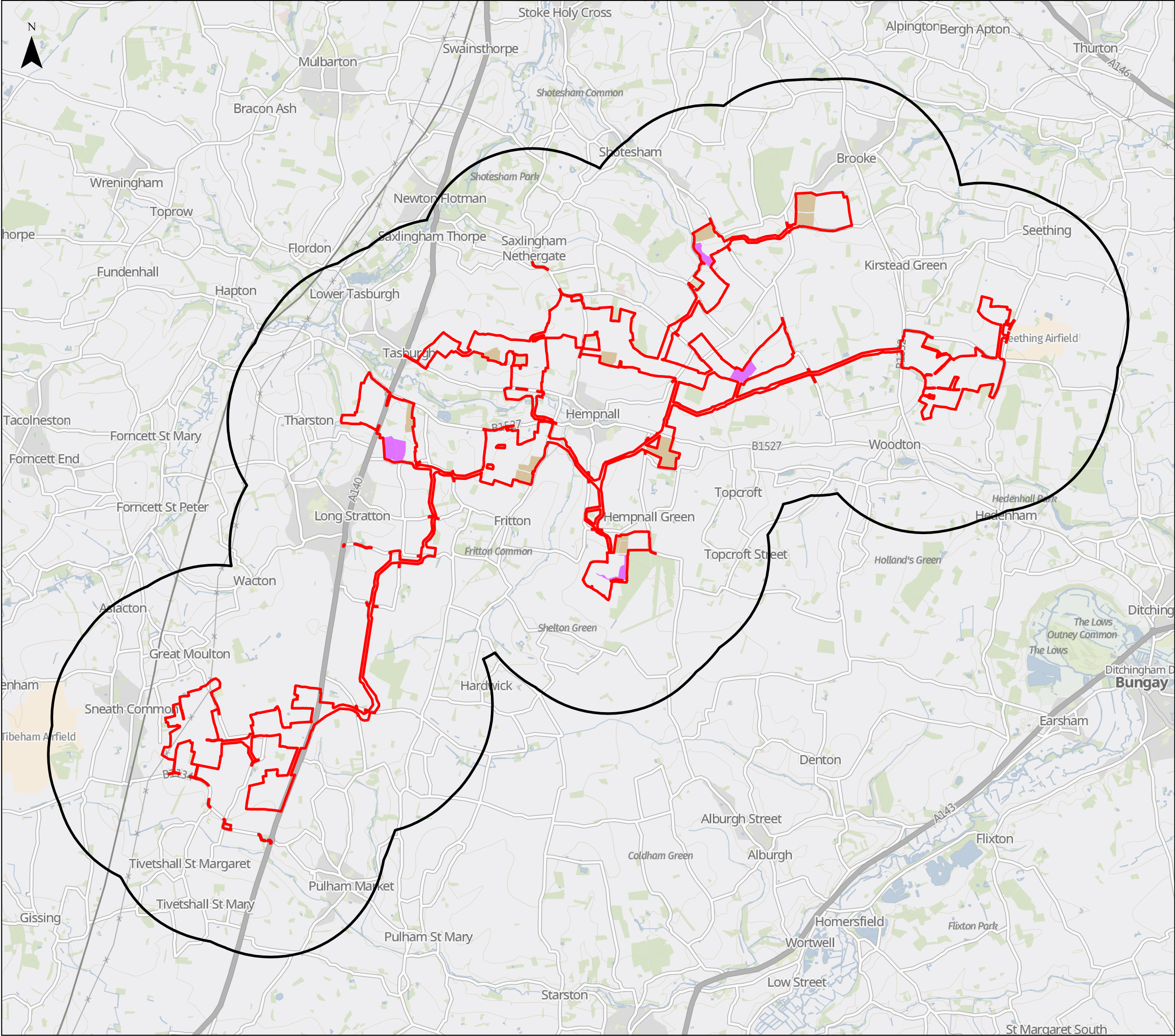
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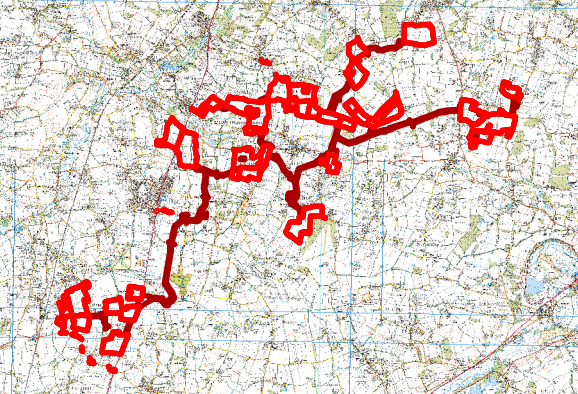
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**Figure 1: Great Crested Newt Method Statement
Figure**

Sheet 19 of 19
Revision 2





Legend

-  Order Limits
-  2km Buffer
-  Proposed Skylark Mitigation
-  Additional Opportunistic Area

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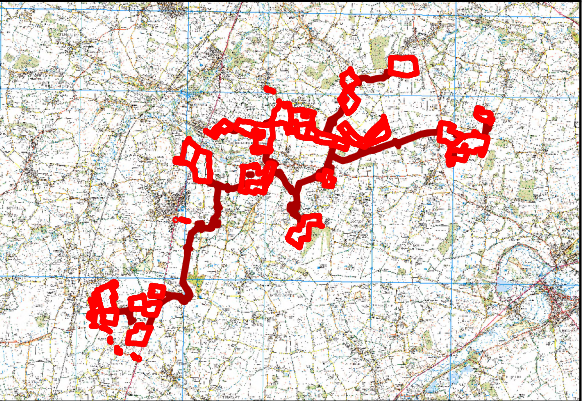
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Figure 2a: Areas Identified for Skylark Mitigation Overview

Revision A





- Legend**
- Order Limits
 - 2km Buffer
 - Proposed Skylark Mitigation

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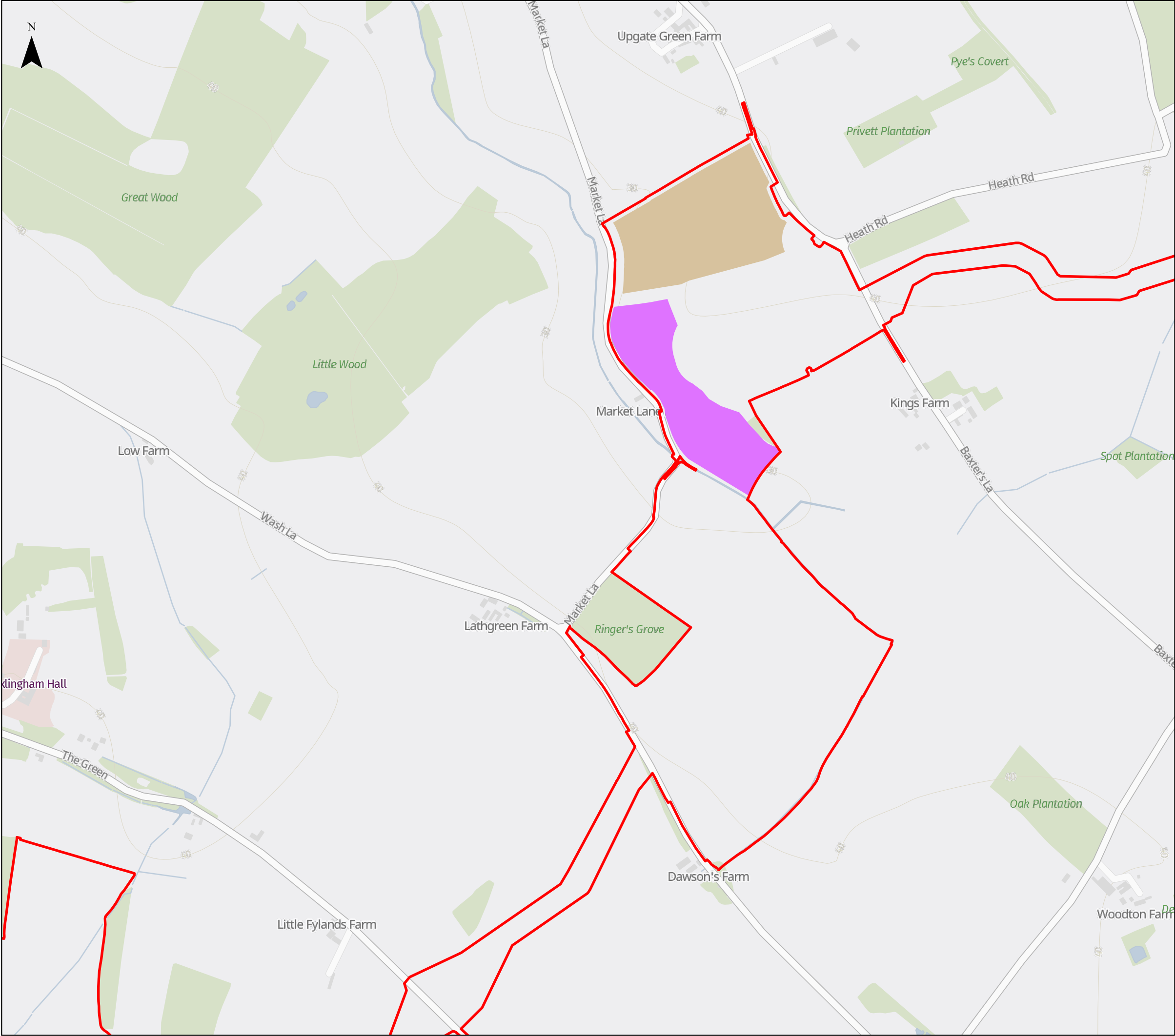
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Ref: Appendix 8.10	Date: 03/03/2026
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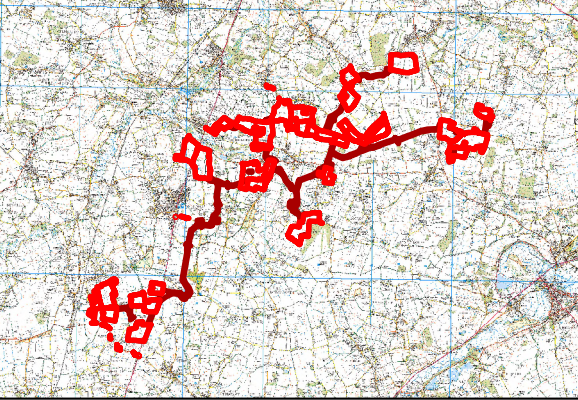
Figure 2: Areas Identified for Skylark Mitigation

Sheet 1 of 10
Revision A









Legend

-  Order Limits
-  2km Buffer
-  Proposed Skylark Mitigation
-  Additional Opportunistic Area

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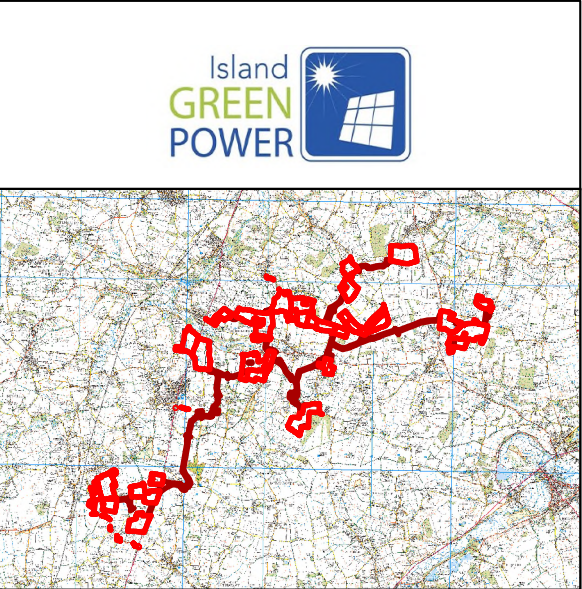
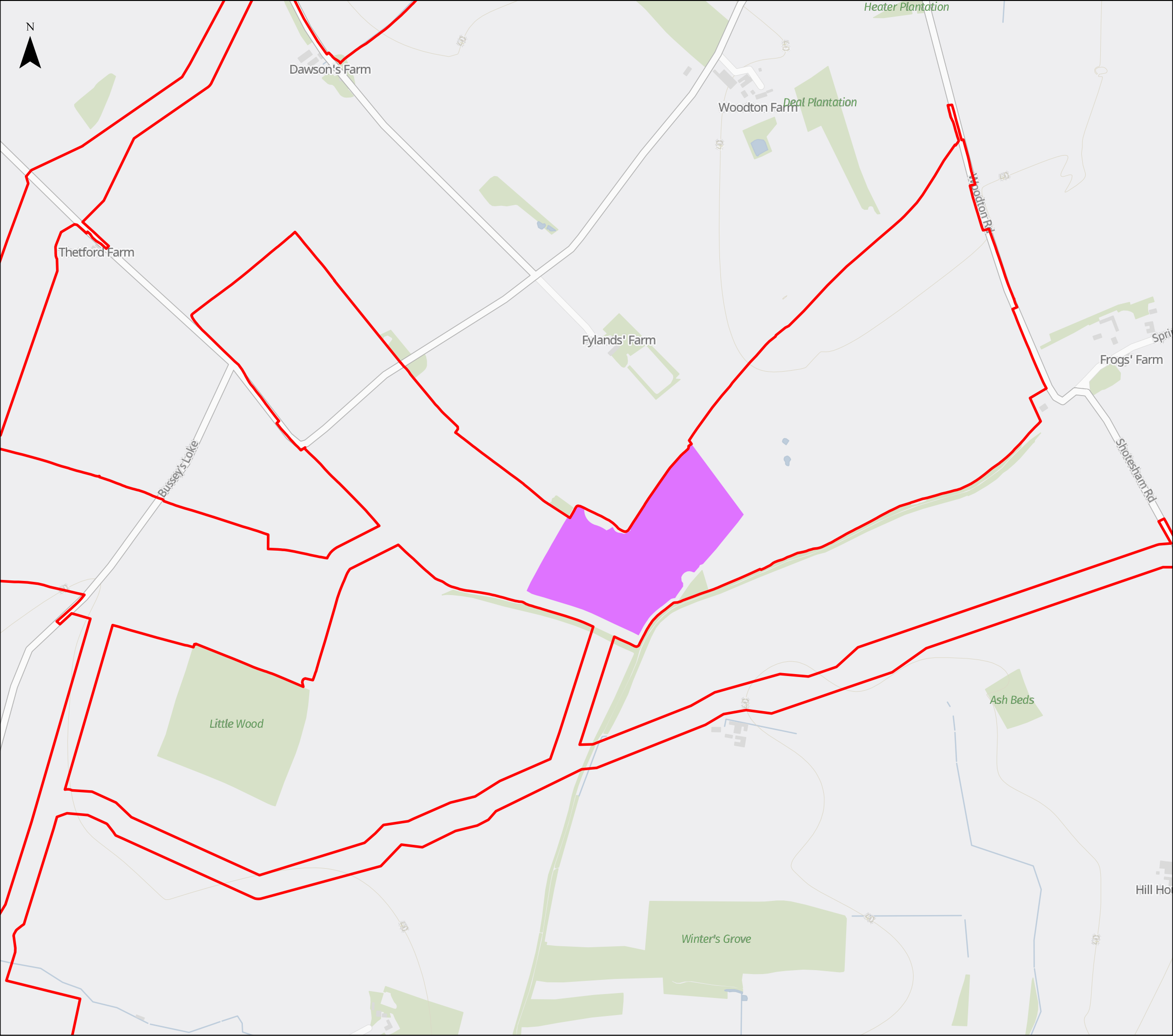
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Drawn: CM	Checked: DF

Figure 2: Areas Identified for Skylark Mitigation

Sheet 2 of 10
Revision A



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Legend

- Order Limits
- 2km Buffer
- Additional Opportunistic Area

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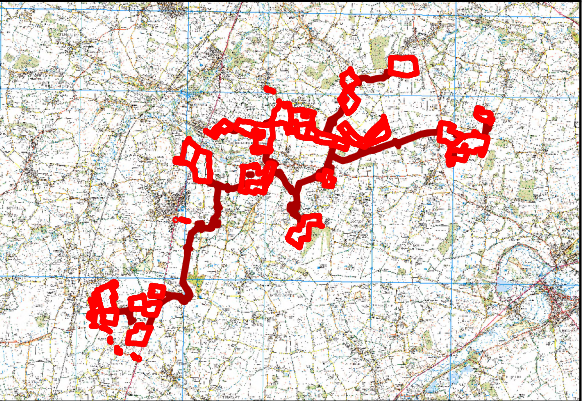
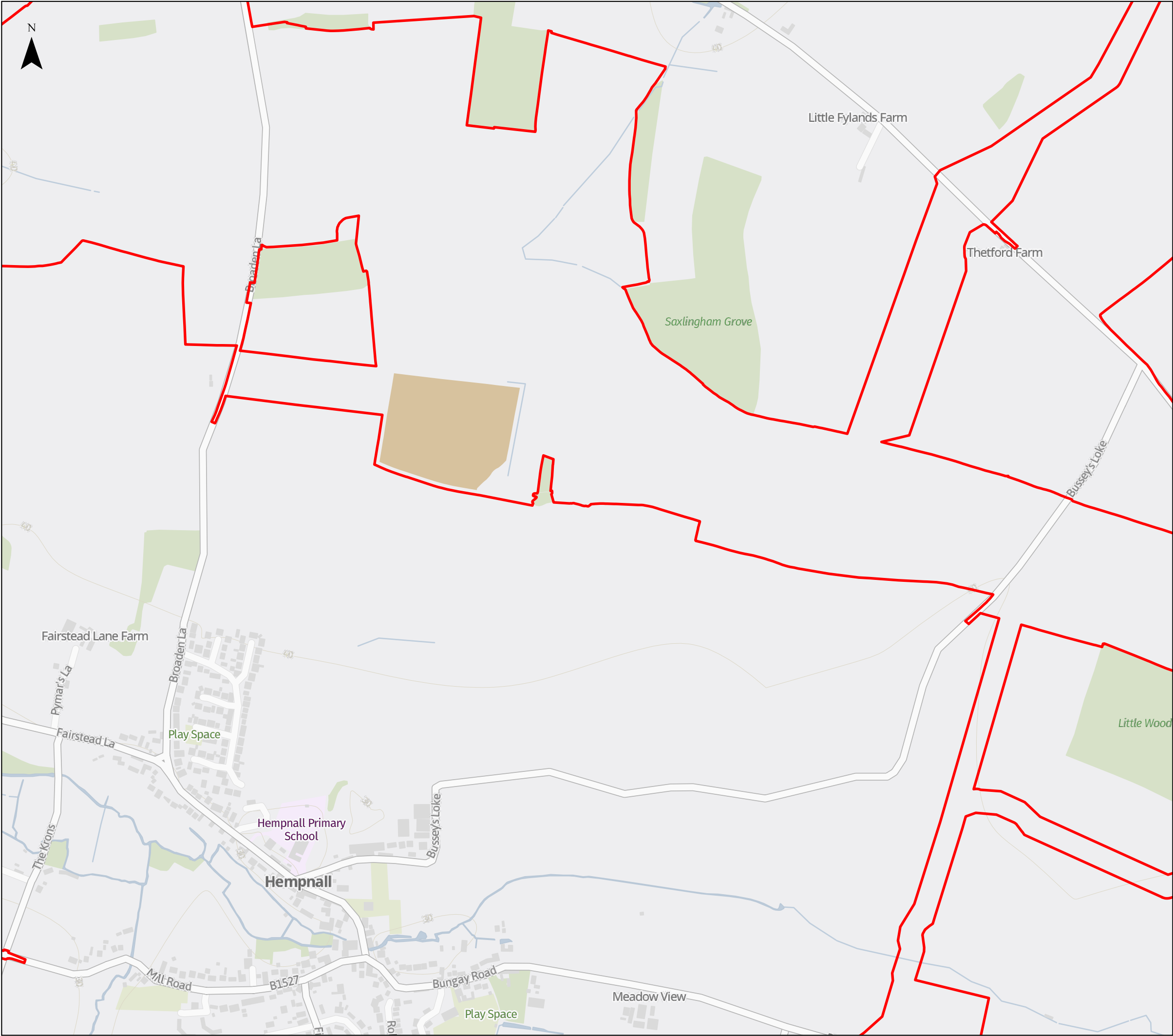
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Ref: Appendix 8.10	Date: 03/03/2026
Drawn: CM	Checked: DF

Figure 2: Areas Identified for Skylark Mitigation

Sheet 3 of 10
 Revision A





- Legend**
- Order Limits
 - 2km Buffer
 - Proposed Skylark Mitigation

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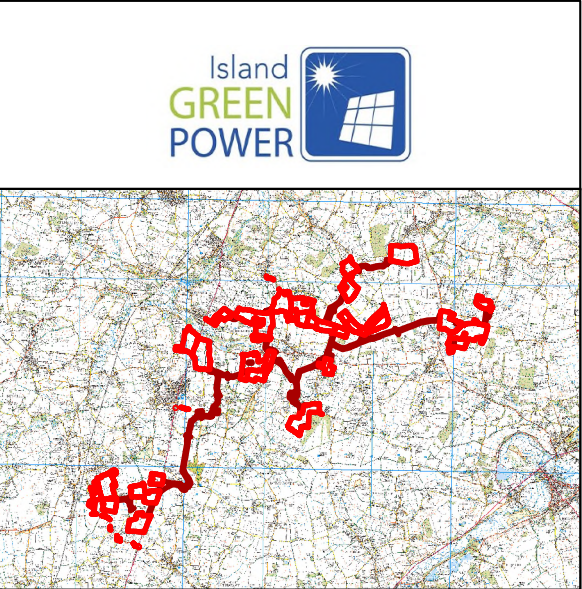
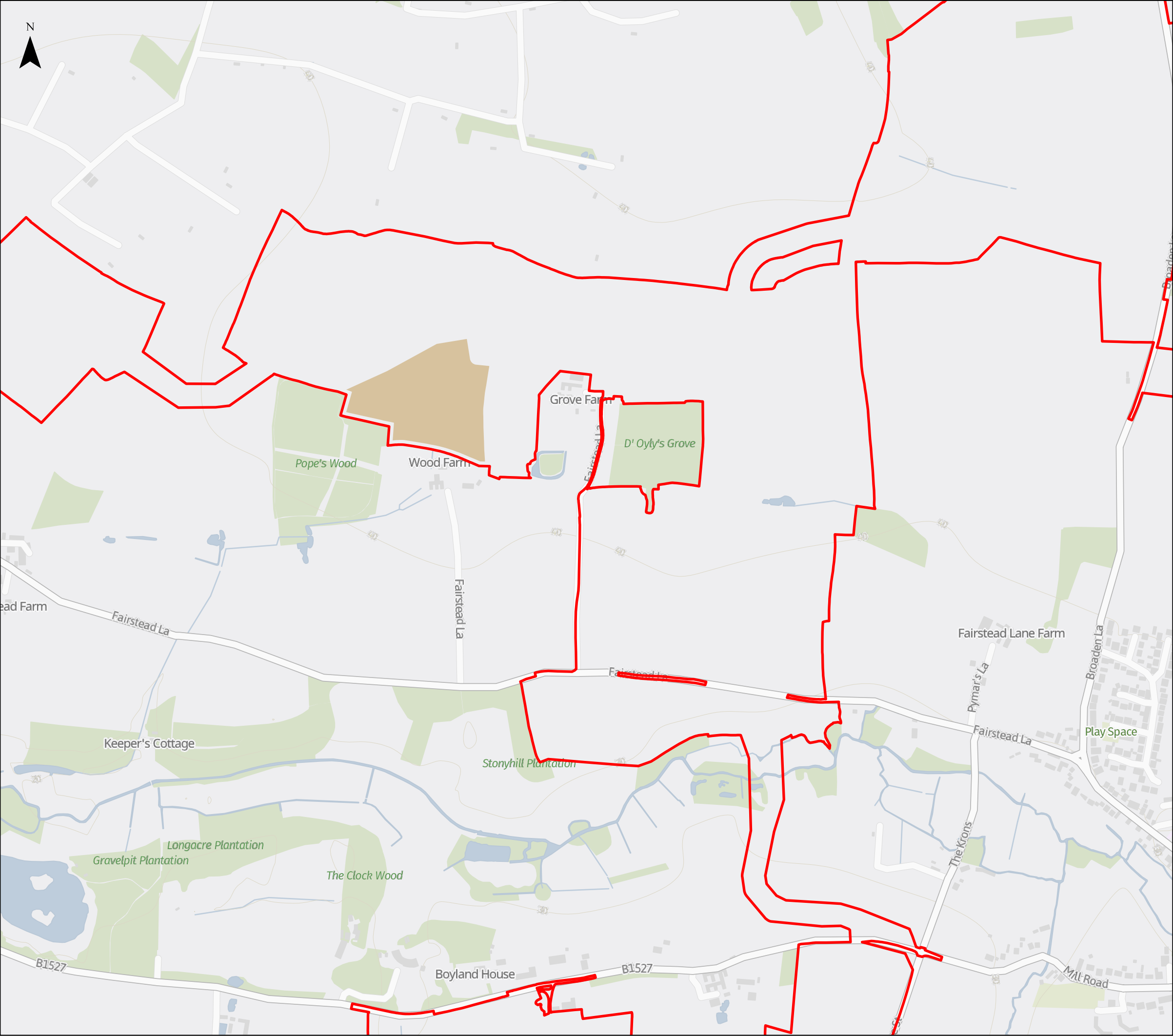
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Figure 2: Areas Identified for Skylark Mitigation

Sheet 4 of 10
Revision A







Legend

-  Order Limits
-  2km Buffer
-  Proposed Skylark Mitigation

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0100200 m

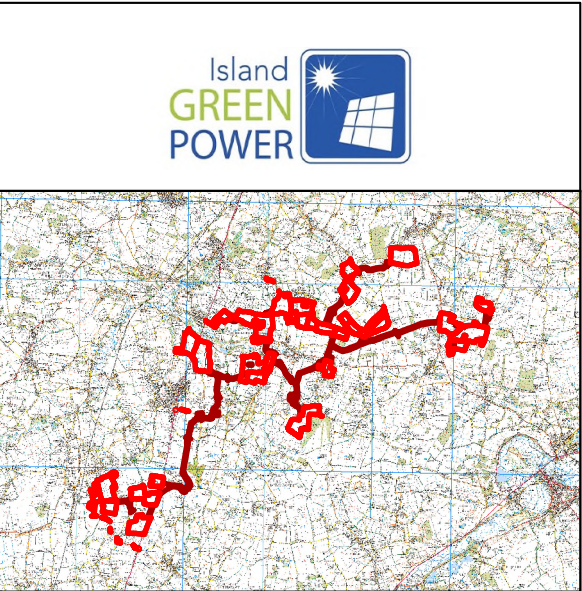
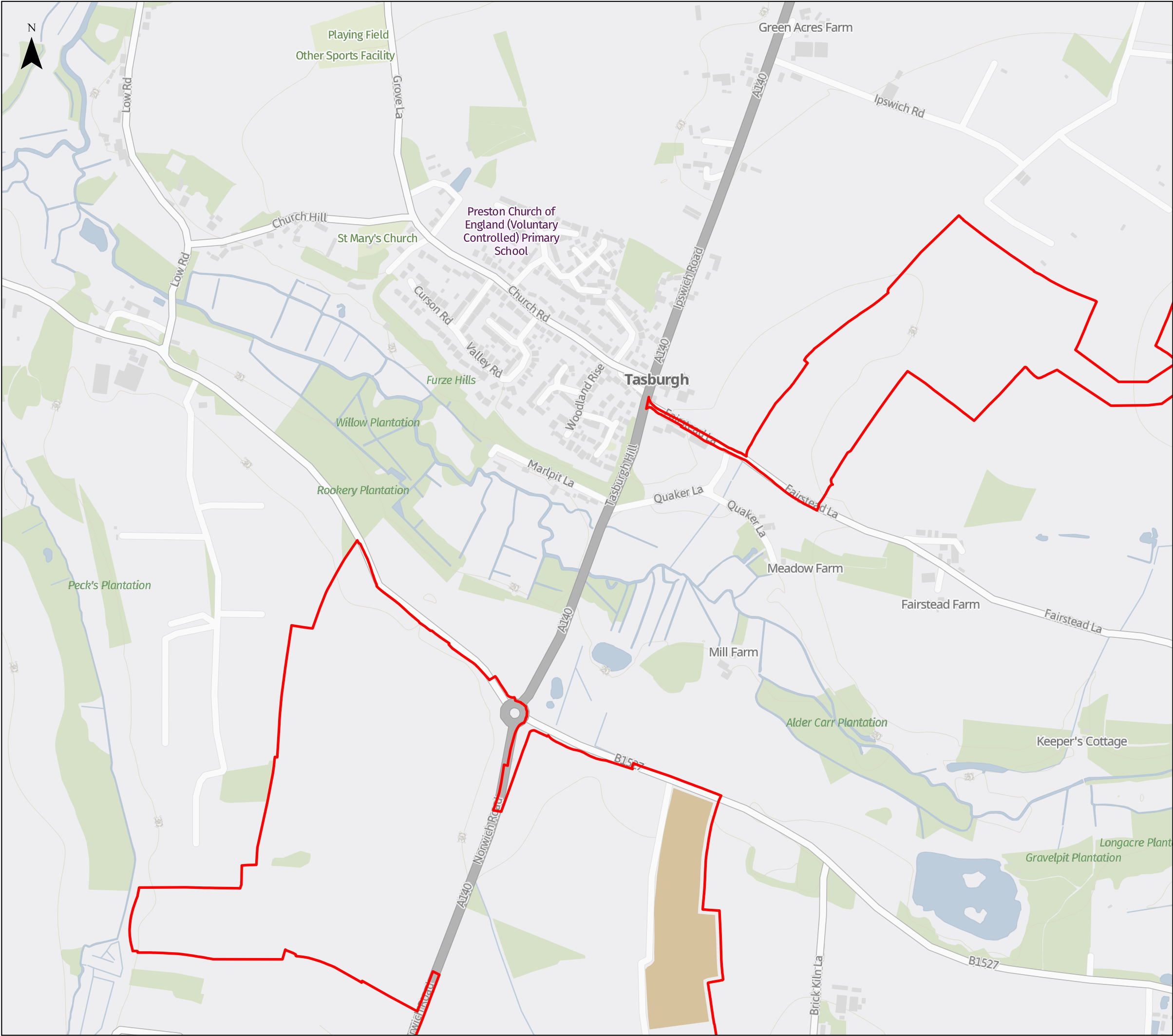
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Ref: Appendix 8.10	Date: 03/03/2026
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Figure 2: Areas Identified for Skylark Mitigation

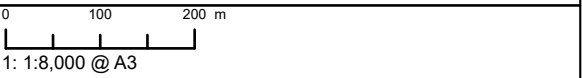
Sheet 5 of 10
Revision A





- Legend**
- Order Limits
 - 2km Buffer
 - Proposed Skylark Mitigation

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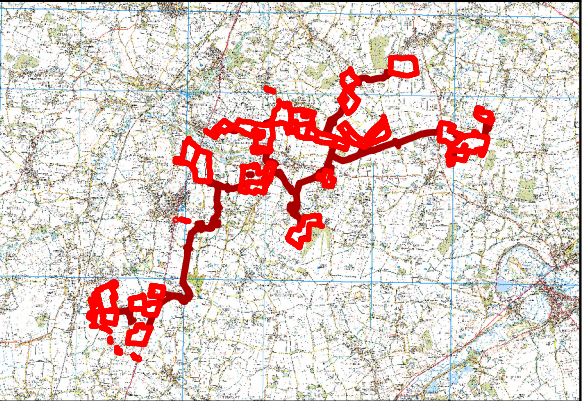
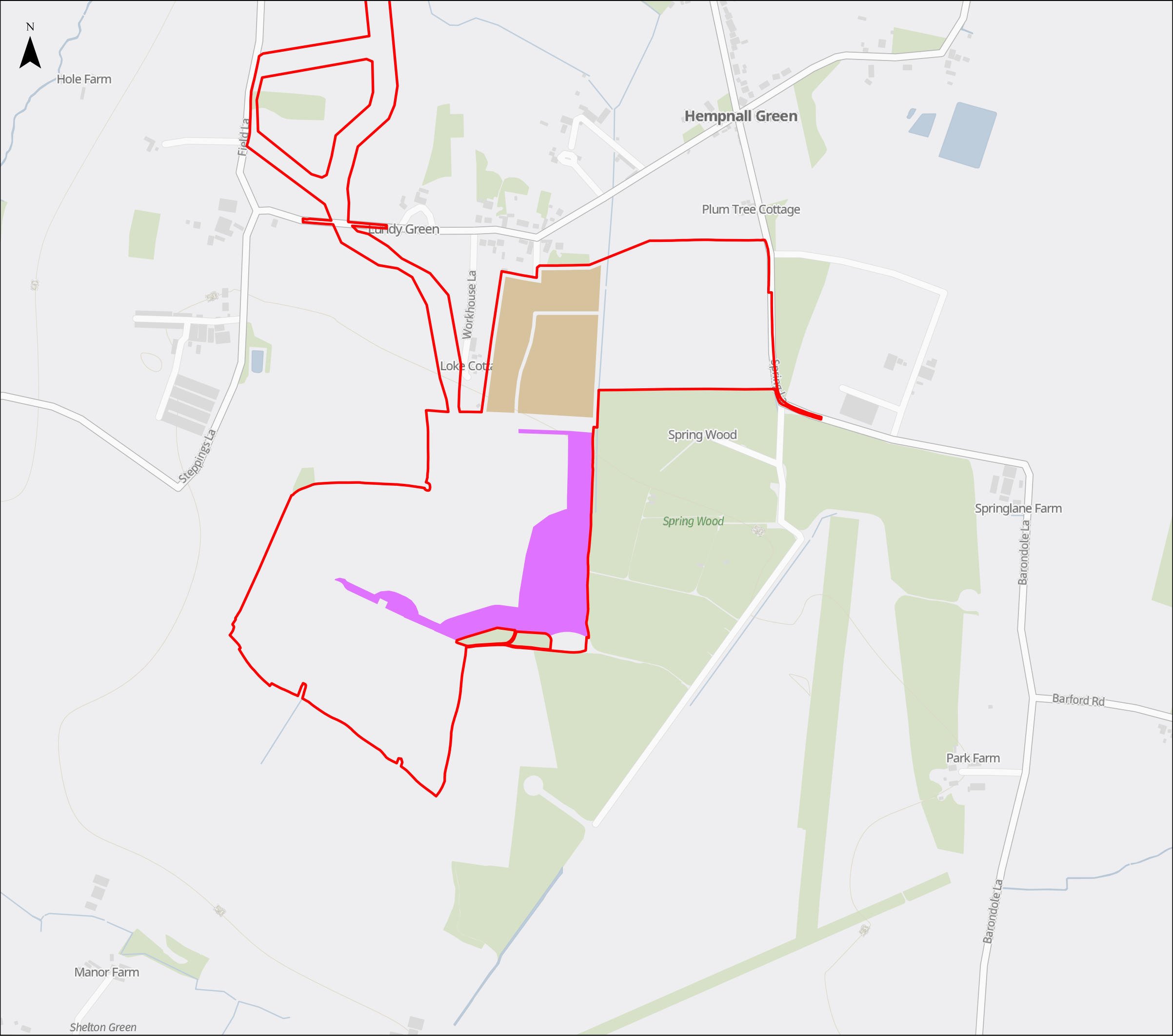


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Figure 2: Areas Identified for Skylark Mitigation

Sheet 6 of 10
Revision A





- Legend**
- Order Limits
 - 2km Buffer
 - Proposed Skylark Mitigation
 - Additional Opportunistic Area

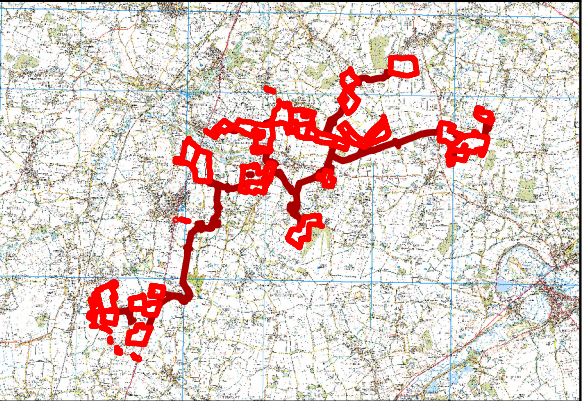
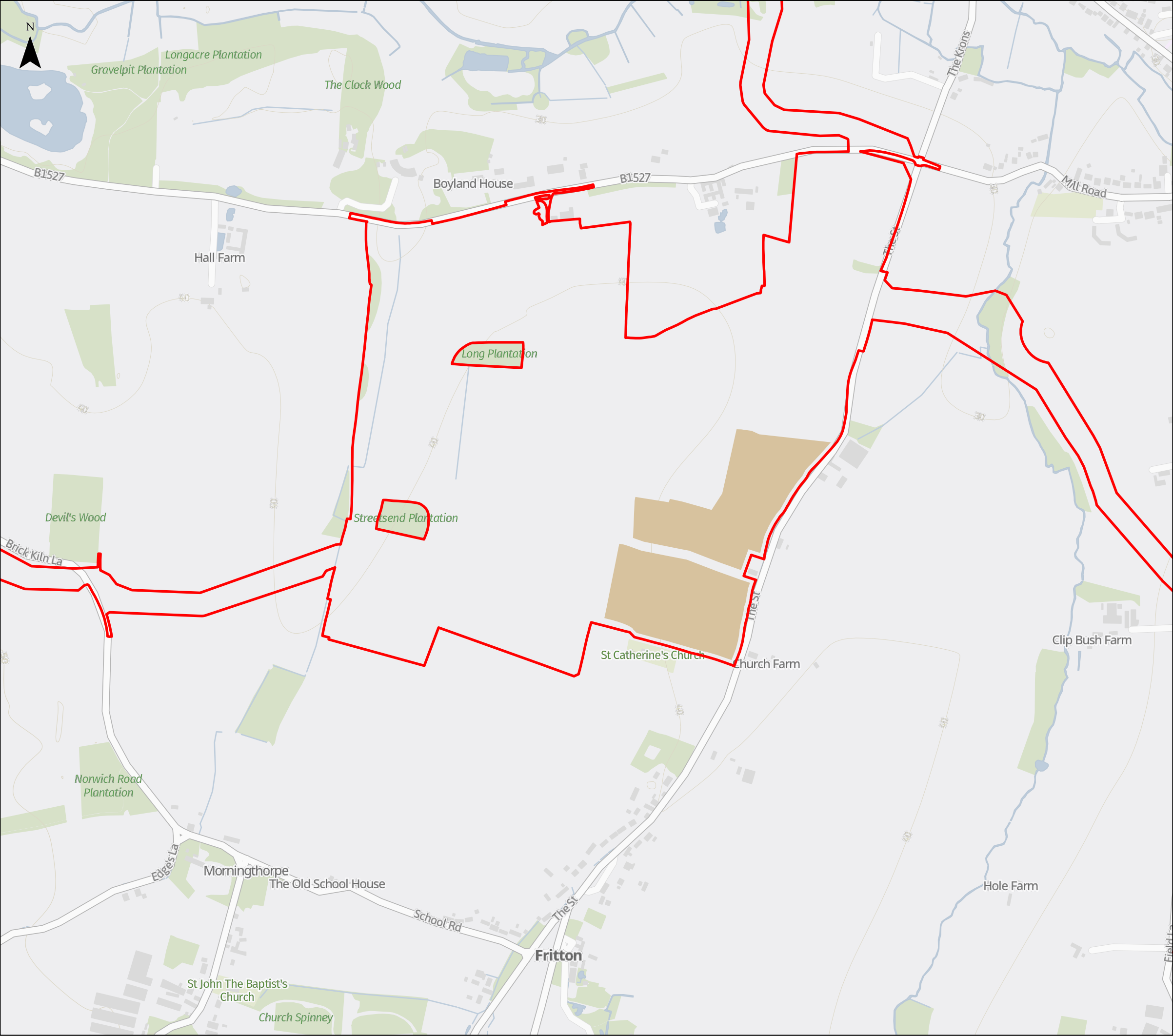
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Figure 2: Areas Identified for Skylark Mitigation

Sheet 8 of 10
Revision A



Legend

- Order Limits
- 2km Buffer
- Proposed Skylark Mitigation

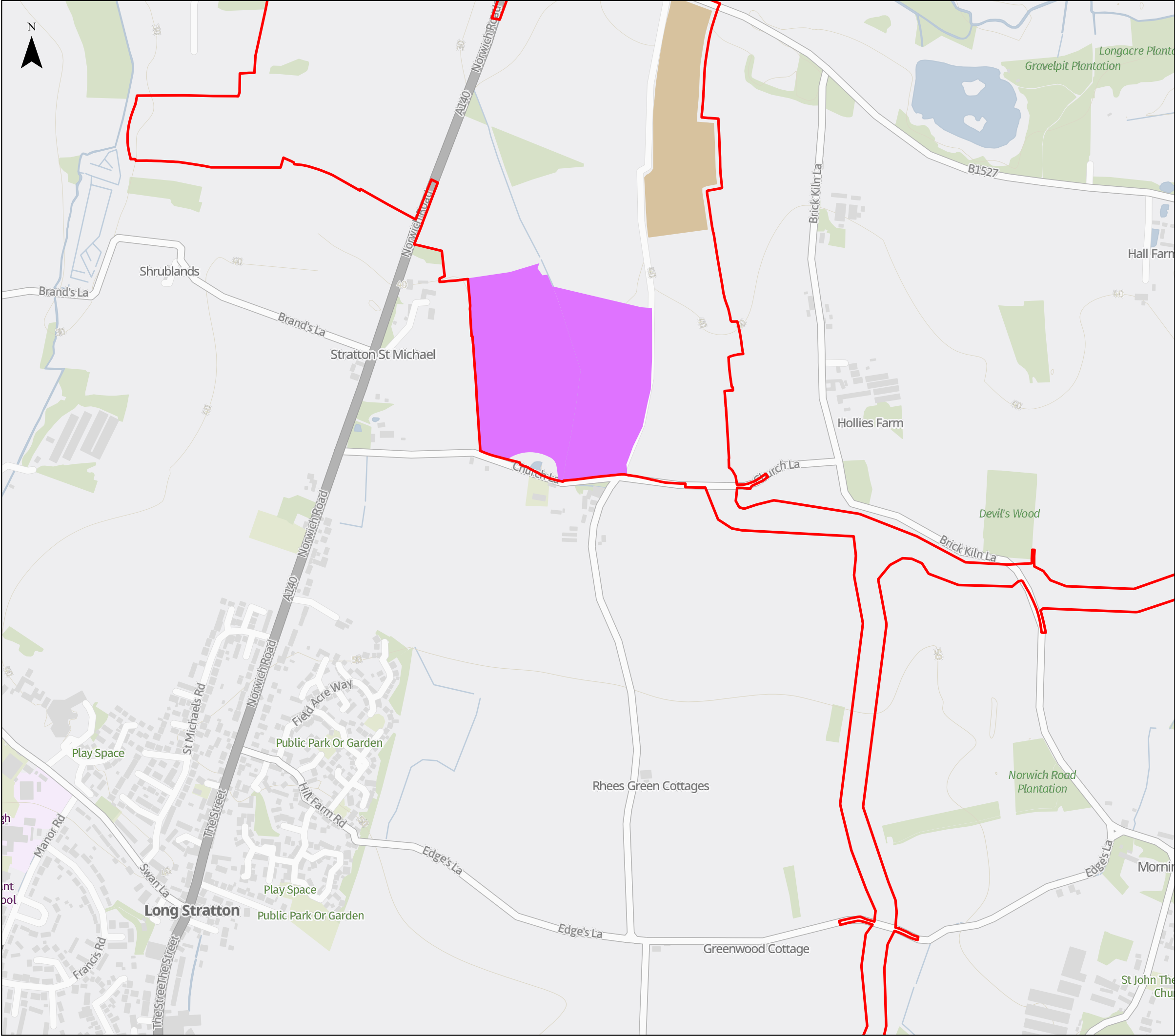
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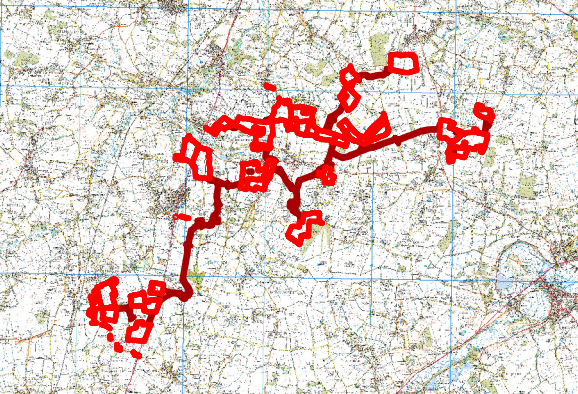
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Figure 2: Areas Identified for Skylark Mitigation

Sheet 9 of 10
Revision A



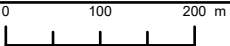




Legend

-  Order Limits
-  2km Buffer
-  Proposed Skylark Mitigation
-  Additional Opportunistic Area

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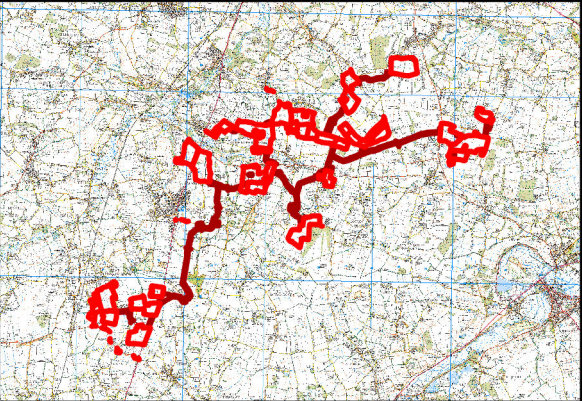
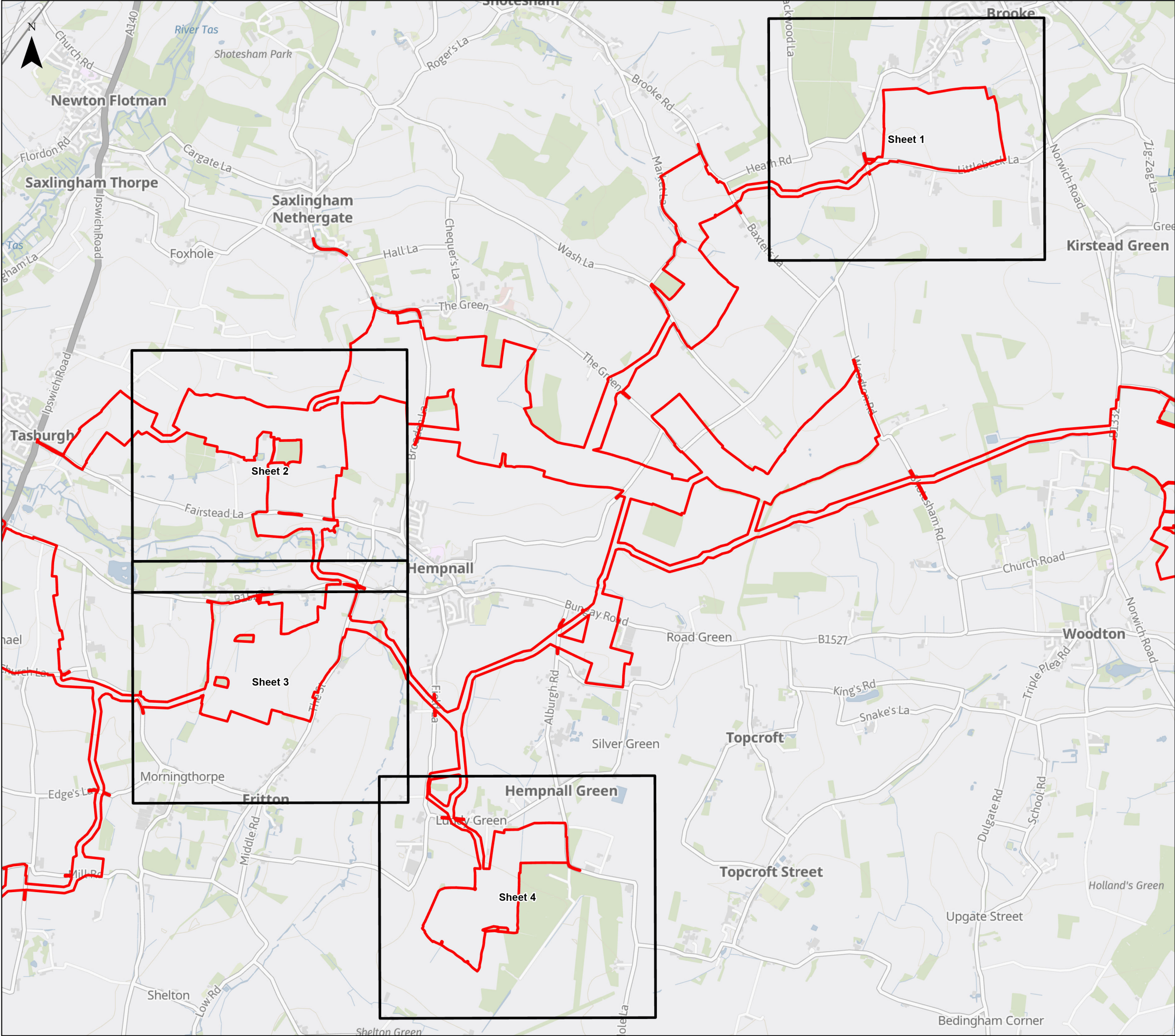
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Figure 2: Areas Identified for Skylark Mitigation

Sheet 10 of 10
Revision A



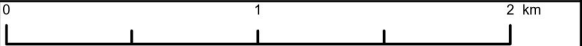
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Legend

- Order Limits
- Sheet Index

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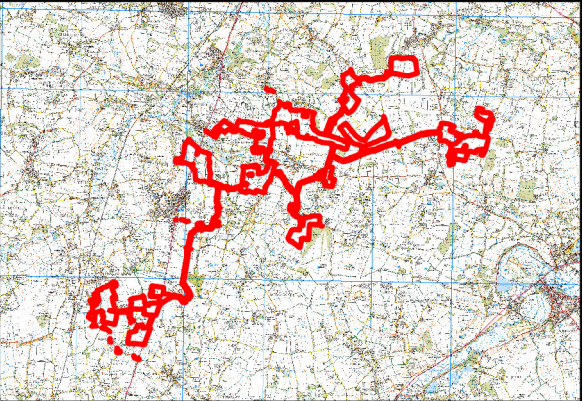
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Figure 3: Invasive Species Location Overview

Revision A

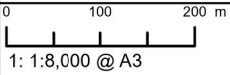




Legend

- Order Limits
- Himalayan Balsam
- Japanese Knotweed
- Giant Hogweed
- Land Parcels

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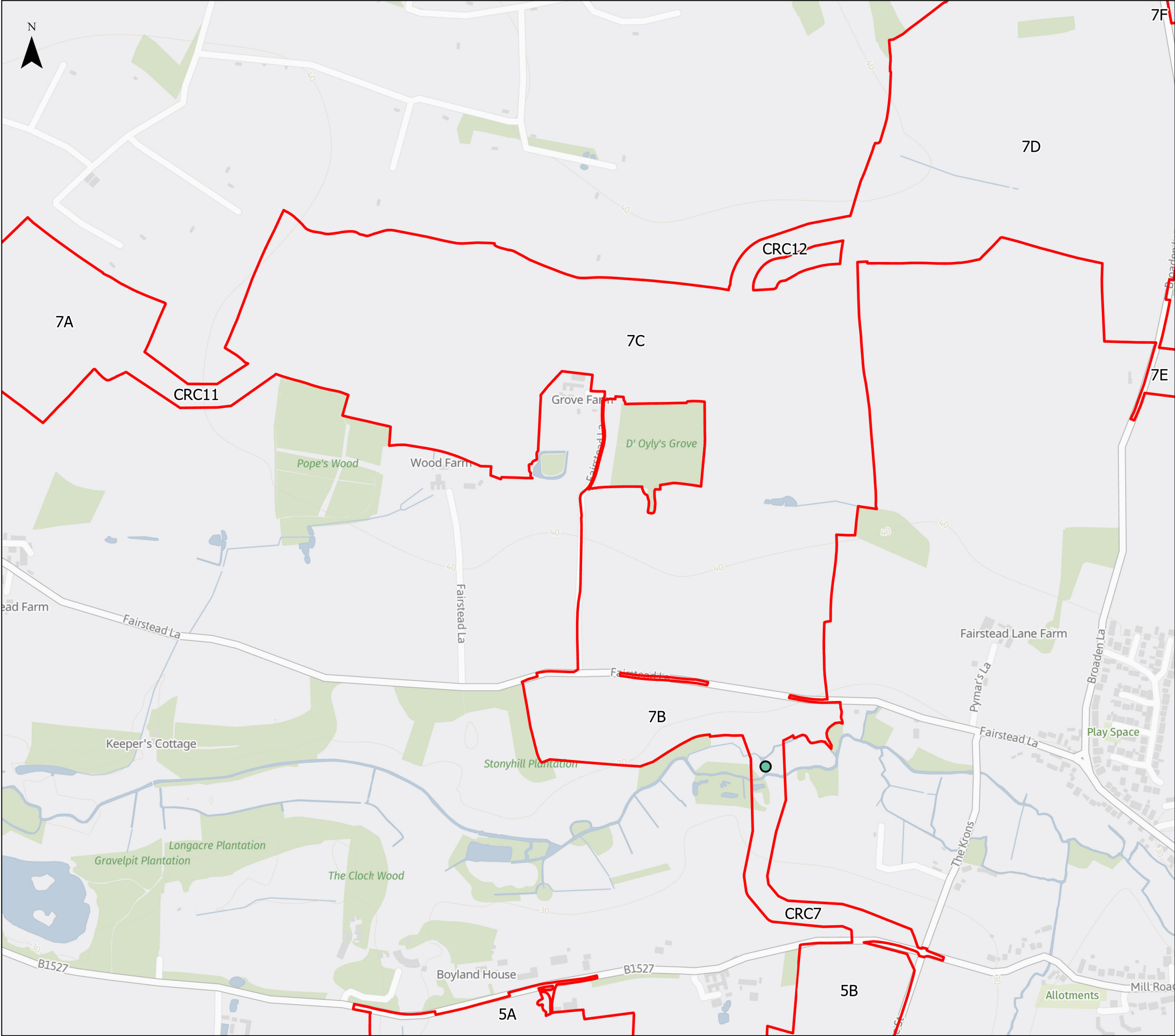


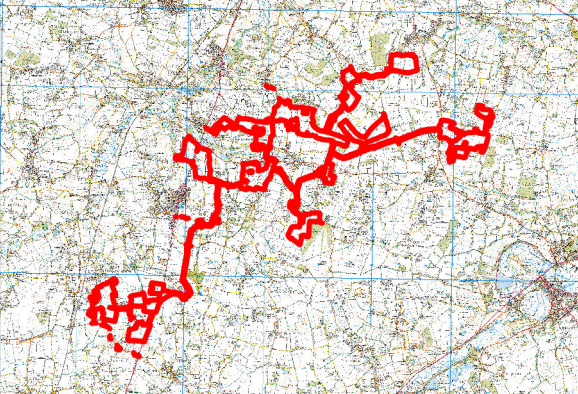
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Figure 3: Invasive Species Location

Sheet 1 of 4
Revision A







Legend

- Order Limits
- Himalayan Balsam
- Japanese Knotweed
- Giant Hogweed
- Land Parcels

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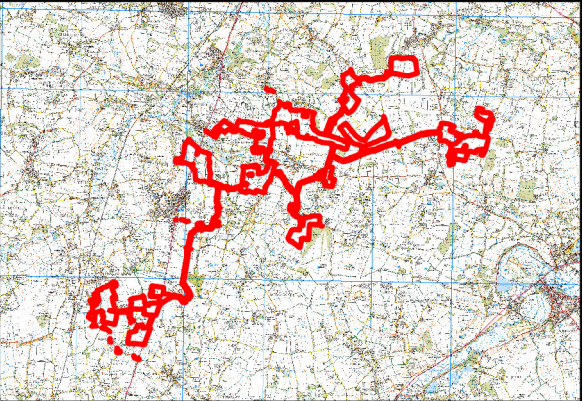
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Figure 3: Invasive Species Location

Sheet 2 of 4
Revision A

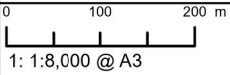




Legend

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Figure 3: Invasive Species Location

Sheet 3 of 4
Revision A



