

**The Examining Authority's written questions and requests for information (ExQ1):  
Issued on 20 March 2026**

**GEN 1.6**

*IPs are invited to review the applicant's consideration of CNP in the planning statement [APP-085] (in particular paragraphs 7.2.52 to 7.2.257) and the policy compliance tracker [REP1-133] (tables 1.4 and 1.5), and state if they agree with its approach, including in respect of the updated NPS published in December 2025 (which the ExA considers to be an important and relevant consideration in decision making) In particular the ExA requests all local authorities and the listed statutory consultees to provide comment on the policy tests on matters of human health and public safety, defence, irreplaceable habitats, flood risk, green belt, sites of special scientific interest, nationally designated landscapes and heritage assets, as well as the HRA.*

Natural England has no comment with regard to the applicant's consideration of CNP in the planning statement beyond noting that our statement of common ground identifies matter where we consider further clarification is required by the applicant. We are otherwise content with the applicant's approach with regards to matters which fall within our core remit.

**ALT 1.7**

**Waveney Valley alternative**

*Reasonable alternatives considered in ES chapter 3 [APP-127] as part of the 2024 (table 3.16 p.89-90) and 2025 (table 3.17 p.106) preferred draft alignments set out the applicant's reasoning for rejection of the use of an underground cable through the Waveney Valley instead of an OHL and pylons. This includes the presence of sensitive peat habitats and paleoenvironmental remains, and hydrological impacts on Wortham Ling SSSI.*

*Natural England is asked to comment on the applicant's ecological considerations in its reasoning for rejection of the Waveney Valley (underground) alternative as set out in ES chapter 3. This should include comment on whether potential effects on peaty soils would constitute irreplaceable habitat loss.*

Natural England notes the applicant's rationale and commends the weight given by the applicant to environmental impacts. Peatland is considered to be irreplaceable habitat and therefore impacts should be avoided where possible. We have not been consulted on the scale of loss or potential mitigation given that it is not proposed by the applicant.

Note that Natural England does not consider local landscape and amenity to be part of its core remit and does not possess local knowledge relating to impacts on these features and are therefore unable to comment on that aspect or the balance of competing interests.

**BIO 1.6**

**Bat tree roost survey coverage**

*As indicated in paragraph 1.1.7 of the updated Bat Roost Report [AS-024] the scope of bat tree roost survey work has been agreed with Natural England by the applicant. Comment on the significant concerns regarding this matter that have been raised by a number of local authorities in their LIRs, for example Braintree DC in [REP1-148], Chelmsford City Council in [REP1-153], Essex CC in [REP1-161] and the joint LIR from Suffolk CC, Mid-Suffolk and Babergh DCs [REP1-178].*

Natural England has provided a further advice letter dated 30 March 2026 to the applicant in relation to bats.

**BIO 1.16**

### ***Dormouse presence and hedgerow removal***

*Are you satisfied that in areas where dormouse presence is confirmed, which will be subject to hedgerow removal, this would not result in a loss of function of suitable habitat, fragmentation of connectivity or severance of populations of dormouse? Also, are you satisfied that the mitigation timescales as set out by the applicant are appropriate to allow planting to establish to a level suitable for habitation by dormouse?*

Natural England provided a letter of no impediment dated the 30 March 2026 to the applicant in relation to dormice.

### ***BIO 1.18***

*European protected species and licensing: Should the Order be made, the ExA notes that the applicant proposes further survey work for European protected species once the detailed design has been formulated. However, the ExA is also aware of the results of the existing surveys for species that confirm a presence in places within the relevant study areas for species including bats, water vole and otter.*

*To Natural England: The ExA notes the applicant's intention to obtain letters of no impediment (LONIs) from you. Provide an update on the current status of negotiations regarding all LONIs that are being sought and comment on whether you consider there to be any likely issues associated with, or impediments to, LONIs being issued for all relevant species.*

Natural England provided letters of no impediment dated 30 March 2026 to the applicant in relation to badgers and dormice and a further advice letter in relation to bats. We will provide further updates regarding protected species at our earliest opportunity.

### ***BIO 1.25***

#### ***Ancient woodland inventory***

*In [RR-2658] you state that you will provide further advice on potential interactions of the proposed development with parcels of ancient woodland that have recently been added to the inventory. Natural England is asked to provide an update on this.*

Following advice from our Ancient Woodland specialists, Natural England advises that additional parcels of Ancient Woodland not currently evaluated within the environmental statement should be subject to assessment through a supplementary document. Natural England will engage further with the applicant.

### ***LUS 1.2***

*Best and most versatile agricultural land (BMV) and soils - 1 It would appear from Paragraph 6.4.7 of the ES that detailed Agricultural Land Classification (ALC) survey was undertaken on approximately 1,011 ha (representing 54% of the proposed survey areas within the Order Limits). Predictive ALC grading was then carried out where it was not possible to undertake a detailed ALC survey. Given the coverage of actual survey work how much confidence can be placed on the applicants response on acid soils in document 8.4.6 page 22 that 'the detailed surveys did not identify the presence of jarosite in the soil and in locations where desk-based information suggested a potential for acid sulphate soils some of the soils were found to be moderately calcareous. There is no evidence to indicate the presence of actual or potential sulphate soils within the surveyed areas'. As being a representative conclusion that can be applied across the whole Order Limits as they are not all 'surveyed areas'.*

We are seeking the advice of soil specialists who have not been able to respond in the time allowed. We hope to provide an update on this question at deadline 4.

### ***LUS 1.4***

*BMV and soils - 3 To what extent are the mitigation measures proposed by the applicant in the outline CoCP (measures GH02 and GH08) sufficiently robust to address issues should acid sulphate soils be encountered during construction.*

We are seeking the advice of soil specialists who have not been able to respond in the time allowed. We hope to provide an update on this question at deadline 4.

Natural England -10 April 2026