

A47 North Tuddenham to Easton

Scheme Number: TR010038

Volume 9

9.41 Applicant's Response to the Secretary of State's Second Request for Comments

The Infrastructure Planning (Examination Procedure) Rules 2010
Rule 8(1)(c)

Planning Act 2008

July 2022

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning
(Examination Procedure) Rules 2010**

A47 North Tuddenham to Easton
Development Consent Order 202[x]

**9.41 APPLICANT'S RESPONSE TO THE SECRETARY OF STATE'S
SECOND REQUEST FOR COMMENTS**

Rule Number:	8(1)(c)
Planning Inspectorate Scheme Reference	TR010038
Application Document Reference	TR010038/EXAM/9.41
Author:	A47 North Tuddenham to Easton Project Team, Highways England

Version	Date	Status of Version
Rev 0	08 July 2022	Final Issue

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1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 North Tuddenham to Easton scheme was submitted on 15 March 2021 and accepted for examination on 12 April 2021.
- 1.1.2 The examination closed on 12 February 2022 and the Examining Authority submitted their recommendations to the Secretary of State on 12 May 2022.
- 1.1.3 This document sets out Highways England's (the Applicant's) response to the Secretary of State's Second Request for Comments issued on 27 June 2022.

2 KEY ABBREVIATIONS

- 2.1.1 The following abbreviations may be used in the Applicant's responses:
 - dDCO = draft Development Consent Order
 - DMRB = Design Manual for Roads and Bridges
 - EIA = Environmental Impact Assessment
 - ExA = Examining Authority
 - NPSNN = National Policy Statement for National Networks 2014
 - NWL = Norwich Western Link
 - the Scheme = the A47 North Tuddenham to Easton dualling scheme

3 APPLICANT'S RESPONSES TO THE SECRETARY OF STATE'S SECOND REQUEST FOR COMMENTS

No.	Question To	ExA Question	Response
1	The Applicant and Natural England	The Secretary of State has not received a response from NE to question 1 of his consultation initiated on 1 June 2022 ("first round of consultation"). The Secretary of State requests the Applicant to provide an update of discussions with NE. Additionally, NE is asked again to provide a copy of any letters confirming they see no impediment to the grant of the necessary species licences by the 1 July 2022 so that the Applicant has the opportunity to consider and respond.	<p>The Applicant welcomes Natural England's response, published on 07 July 2022, and confirm they are continuing to engage with Natural England to provide reassurance that the survey methodology and any further mitigation required will be appropriate and provided at the relevant level of detail within the Landscape and Ecology Management Plan (LEMP).</p> <p>In Annex A of this document the Applicant presents an update of their discussions with Natural England.</p>
2	Natural England	<p>Berry Hall Estate</p> <p>The Secretary of State notes NE have not yet responded to question 2 of first round of consultation and, has indicated an intention to respond by the 1 July 2022. Thereafter the Applicant is invited to consider the NE response and respond by the deadline.</p>	<p>Natural England's response, published on 07 July 2022, confirms our position presented during the Examination, and summarised in our Deadline 9 Submission '9.34 Applicant's Statement of Final Position' (REP9-037), that the IHTA designation is for outstanding scenic land, not heritage, and the key aspects of the designated land (the river valley landscape, mature woodlands and historic features) would continue to retain their outstanding interest in the long term, subject to the establishment of appropriate mitigation measures.</p> <p>In the Environmental Masterplan, Rev. 4, Sheet 8 of 14 (REP8-011), the Applicant has included tree and shrub planting along the entire southern side of the junction at Wood Lane to screen views of the operational Scheme northwards from Berry Hall, the designated land to the south and from East Tuddenham Footpath 3. The tree cover proposed by the Applicant in this location has been designed to avoid a clear line of sight through the vegetation towards the Wood Lane Junction southern roundabout.</p> <p>The Applicant acknowledges Natural England's concerns that the mitigation measures shown on Environmental Masterplan Sheet 8 of 14 with regards providing effective screening for the designated land. Therefore, the Applicant will</p>

No.	Question To	ExA Question	Response
			<p>further consult Natural England on the design of the tree and shrub planting proposed at the northern extent of the Berry Hall Estate, beside the Wood Lane Junction southern roundabout, prior to seeking Secretary of State approval to of the landscape design under Requirement 5 of the Draft Development Consent Order, Rev.9 (REP9-008).</p> <p>With regards Natural England's reference to the drawing note "<i>utilities and woodland planting will be reviewed at stage 5 as part of detailed design to achieve tree screening between utilities and junction</i>", it is not the Applicant's intent to reduce the extent of proposed planting. The note is intended to reflect the fact that discussions are on-going with Anglian Water over the final alignment of the diverted water pipeline and associated opportunities to increase vegetation screening where possible (e.g. if agreement is reached to divert the Anglian Water pipeline under the roundabout, the number of trees and shrubs planted within the proposed area of screening at the northern extent of Berry Hall Estate will likely increase as the area required to be left clear of planting above the water pipeline will be reduced in this location).</p>
3	Natural England	<p>Habitats Regulation Assessment</p> <p>The Secretary of State has considered the Applicant's response to question 4 of his first round of consultation. The Secretary of State invites NE to comment on the Applicant's response by 1 July 2022. Thereafter the Applicant is invited to consider the NE response and respond by the deadline.</p>	The Applicant notes that this question was posed directly to Natural England, but welcomes their response published on 07 July 2022.
4	The Applicant and Anglian Water Services	<p>AWSL protective provisions</p> <p>The Secretary of State has received a response from AWSL on question 5 of his first round of consultation. The Secretary of State requests AWSL provide further</p>	The Applicant notes that this question was posed directly to Anglian Water, but welcomes their response published on 06 July 2022.

No.	Question To	ExA Question	Response
	Limited (AWSL)	submissions on " <i>the legal basis for deferment not to apply for all diversion works and the different approach being taken by National Highways to Anglian Water than to other parties</i> " by 1 July 2022 so that the Applicant has the opportunity to consider and respond. The Applicant's response to question 5 includes proposed amendments to the draft Order. The Secretary of State asks AWSL to confirm whether they are content with those amendments.	
5	The Applicant	<p>THE NORFOLK LOCAL TRANSPORT PLAN 4</p> <p>The Secretary of State received responses from two Interested Parties, Dr Andrew Boswell and Bryan Robinson, in relation to the Norfolk Local Transport Plan 4 ("the Plan"), which is due to be adopted in July 2022. In the light of those concerns, the Secretary of State invites the Applicant to provide an assessment against the carbon targets contained within the Plan.</p>	<p>The Norfolk Local Transport Plan 4 (LTP4) sets out Norfolk County Council's (NCC's) plans, policies and programmes on transport and transport infrastructure for the period to 2036. The LTP4 Strategy was adopted at a full County Council meeting on 29 November 2021. It identifies the projects and programmes that are important within LTP4, including the A47 Easton to Tuddenham dualling which is highlighted as one of the ongoing achievements with the priority action area for enhancing connectivity. The plan sets out how the NCC will decarbonise the transport network. It records that the NCC's Environmental Policy has been adopted and that this sets out a move towards carbon neutrality by 2030. The LTP4 Implementation Plan was subsequently the subject of consultation.</p> <p>NCC Cabinet has approved and recommended to Full Council that the Implementation Plan is adopted. Together, the LTP4 Strategy and the Implementation Plan replace the current LTP3. Within the Implementation Plan, a local carbon trajectory is given based on road transport ('tailpipe emissions') published by the Department for Business, Energy and Industrial Strategy. The trajectory within the LTP4 is in line with the upper end of range under the Department for Transport's (DfT) Transport Decarbonisation Plan (TDP).</p> <p>The LTP4's targets follow the same trajectory for tailpipe (end-user) emissions and are thus aligned to the national targets within the TDP, reaching net zero</p>

No.	Question To	ExA Question	Response																
			<p>carbon by 2050. The Applicant's own Net Zero targets, set out in the National Highways Net Zero Highways Plan, are also aligned with the Transport Decarbonisation Plan and are for net zero carbon travel on their roads by 2050.</p> <p>As described in the Applicant's Response to the Examining Authority's First Written Questions (REP2-014 – Q4.0.1), the assessment of end-user emissions is conservative and likely overestimated as the uptake of new electric vehicles in future years is expected to be higher than the proportions used in the Scheme assessment. This will be achieved through the Government's commitments to remove all emissions from road transport to achieve net zero by 2050, which include:</p> <ul style="list-style-type: none"> • An end to the sale of new petrol and diesel cars and vans by 2030 • All new cars and vans to zero emissions at the tailpipe by 2035 • All new L-category vehicles to be fully zero emissions at the tailpipe by 2035 • The end of the sale of all non-zero emissions heavy good vehicles (HGVs) by 2040 <p>The table below presents the predicted emissions in respect of the Scheme against the national carbon budgets and also includes the results of a sensitivity assessment using the TDP's trajectory to highlight the impact of national policies in the TDP.</p> <table> <tr> <th colspan="4">Carbon Budgets</th></tr> <tr> <th></th><th>4th (2023-2027)</th><th>5th (2028-2032)</th><th>6th (2033-2037)</th></tr> <tr> <td>National Carbon Budget (tCO₂e)</td><td>1,950,000,000</td><td>1,725,000,000</td><td>965,000,000</td></tr> <tr> <td>Scheme Do Something (DS) - Do Minimum (DM) (tCO₂e)</td><td>111,626</td><td>40,695</td><td>41,771</td></tr> </table>	Carbon Budgets					4 th (2023-2027)	5 th (2028-2032)	6 th (2033-2037)	National Carbon Budget (tCO ₂ e)	1,950,000,000	1,725,000,000	965,000,000	Scheme Do Something (DS) - Do Minimum (DM) (tCO ₂ e)	111,626	40,695	41,771
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			DS-DM based on TDP (upper) (tCO ₂ e) trajectory	110,673	35,963	34,833
			DS-DM based on TDP (lower) (tCO ₂ e) trajectory	110,486	35,209	32,699
			<p>The NPSNN requires assessment against the Government's carbon reduction targets, which are to be delivered through the pathway provided by the statutory carbon budgets. 5.18 states that: <i>"...any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets"</i>.</p> <p>Section 3.4 in the Applicant's Response to the Rule 17 Request in February 2022 (REP10-005) sets out how the assessment presented within ES Chapter 14 (REP3-014) demonstrates that the Scheme will not have a material impact on the Government's ability to meet its carbon reduction targets.</p> <p>The carbon budgets are set at a national geographical scale. The NPSNN does not require assessment against any local or regional targets. The only statutory targets are those set at a national level¹.</p> <p>Although LTP4 sets out a target trajectory, it has not presented a methodology to determine what would or would not be a significant impact for either EIA or planning purposes. The Government has not identified or adopted any carbon reduction targets at a scale smaller than the UK as a whole; i.e. National Carbon Budgets. Therefore, for the reasons given, it is not possible or appropriate in the context of the determination of the DCO application to undertake an assessment</p>			

¹ This point was also explored in recent decision letters such as at the M54 to M6 Link Road where the Secretary of State accepted that the only statutory carbon targets are those at a national level (<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010054/TR010054-001200-Decision%20Letter%20-%20M54%20to%20M6%20Link%20Road.pdf>)

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			of likely significance relative to the LTP4 trajectory.
6	All Interested Parties	The Secretary of State would like to invite comments from all Interested Parties on the responses received in relation to the first round of consultation.	<p>With responses received in relation to the Secretary of State's first round of consultation, those relating to carbon emissions and the Norfolk County Council (NCC) Local Transport Plan 4 are discussed in the Applicant's response to the Secretary of State's above question 5.</p> <p>With regards Anglian Water Services Limited's comment on protective provisions the Applicant's response to the Secretary of State's above question 4.</p> <p>With regards all other first round of consultation submissions, the Applicant has no new information / response to present. However, in order to aid the Secretary of State, the Applicant has summarised previous responses presented during Examination that responded to the concerns raised:</p> <ul style="list-style-type: none"> • Traffic models (different models by the Applicant and NCC) - The 'Applicant's Response to the Relevant Representations' (REP1-013) explains why the Applicant and NCC used different traffic models, but that checks have been made to ensure they align; the traffic models use a consistent traffic modelling methodology, but are independent of one another and will vary due to different development timelines (e.g. base year model, assumptions as to opening year) and different effects on the surrounding local network. • Traffic models (third party queries) - The Applicant has responded to all queries raised by third parties regarding the traffic modelling and impacts on local roads, such as to questions raised at Deadline 5 (REP5-017) in document '9.23 Applicant's Responses to Deadline 5 Comments' (REP6-017). • Traffic models (independent assessment) - The Applicant has consulted with: Highways England's Safety, Engineering & Standards (SES) Transport Planning Group (on all traffic modelling aspects) who undertake independent assurance and governance checks; and also with NCC to validate the traffic modelling and junction proposals. The Applicant has engaged with NCC throughout the design development process, sharing traffic models, survey data and submitted design and traffic proposals for cross review. The Statement of Common Ground with NCC (REP9-019) confirms agreement on

No.	Question To	ExA Question	Response
			<p>traffic modelling; see items 113 to 116 in Section 3.2.</p> <ul style="list-style-type: none"> • Chalk rivers – the effects of the Scheme on the chalk rivers Tud and Wensum and the Broadland Rivers Chalk and Crag WFD groundwater body are considered in Environmental Statement Chapter 13 'Road Drainage and the Water Environment' (APP-052). This chapter includes an assessment of potential construction and operation related impacts on each of the water bodies' quantity and quality elements and whether these impacts could lead to non-compliance of the Water Framework Directive (WFD) and the ability of the relevant WFD water bodies to meet their current objectives. The assessment concluded there would not be any significant impacts caused to the water environment by the Scheme, with mitigation in place, and the WFD assessment concludes that the Scheme will be compliant with the requirements of the WFD. The Environment Agency has commented on this assessment and reached agreement on all matters raised with the Applicant, as reported in the Statement of Common Ground with the Environment Agency (REP9-015). • Aquatic macrophyte survey – with regards the request that an aquatic macrophyte survey be completed, Table 8-3 'Surveys undertaken' of Environmental Statement Chapter 8 'Biodiversity' (APP-047) confirms the Phase 2 botanical surveys in May 2017 and August 2019 applied the Aquatic National Vegetation Classification method. Environmental Statement Appendix 8.1 'Botanical Survey Report' (APP-096) also contains references to species as being located 'in river', such as Branched Bur-reed (<i>Sparganium erectum</i>) and Watercress (<i>Nasturtium officinale</i>) on page 47. • Section 15 of NPPF and Section 5 of NPSNN (avoid a new river crossing) - The preferred route option was based on a balance of considerations informed by technical and economic appraisals plus consultation feedback. As part of the Statutory Consultation in 2020, the Scheme Assessment Report (SAR)² was published on the project website and available at consultation venues. The SAR included the Stage 1 Technical Appraisal Report, which

² This report is available amongst the Consultation 2020 documents at: <https://highwaysengland.co.uk/ourwork/east/a47-north-tuddenham-to-easton-improvement/>

No.	Question To	ExA Question	Response
			<p>outlined the 14 potential route options that were assessed comparatively in terms of their engineering, environmental, transportation and economic suitability; see Section 2 of the Case for the Scheme for details (APP-140). The statutory consultation in 2020 on the proposed Scheme design led to refinement of the Scheme design as reported in Table 4.12 in the Consultation Report (APP-024). In addition, the Applicant responded to proposed alternative designs presented during the Examination, such as alternative side road connections in the 'Applicant's Responses to Deadline 4' (REP5-016) and alternative Wood Lane junction designs in the Applicant's '9.15 Alternative Wood Lane Junction Options Appraisal – Rev.1' (REP6-015).</p> <ul style="list-style-type: none"> • Bat mitigation - With regards concerns about bat mitigation and the Scheme identifying a 'large/major adverse' for bats, the Secretary of State is directed to the Applicant's response to Q3.0.13 in 'Applicant's Response to the Examining Authority's First Written Questions (ExQ1)' (REP2-014) which provides justification to demonstrate that all potential options have been fully explored to mitigate such effects. The Applicant's update on current surveys and engagement with Natural England is also presented in response to the Secretary of State's above question 1. • Biodiversity net gain metric 2.0 – with regards to whether this has been produced, the Applicant's position is summarised in Annex B of the 'Applicant's Written Summary of Oral Submissions at ISH2' (REP4-015). • Other issues (e.g. hedgerows, barn owls and Hockering Footpath 7) – these were raised during Examination with responses provided by the Applicant; for example, responses RR-037.46 (barn owls) and RR-037.58 (Hockering Footpath 7) RR-041.6 & RR-057.6 (important hedgerows) in the Applicant's Response to the Relevant Representations (REP1-013).

ANNEX A

SUMMARY OF ENGAGEMENT WITH NATURAL ENGLAND REGARDING PROTECTED SPECIES

Background

As reported in the 'Statement of Commonality for Statements of Common Ground, Rev.3' (**REP9-026**), the position of Natural England at Deadline 9 was Under Discussion.

A draft SoCG had been developed by the Applicant and was issued to Natural England in February 2021, then an updated version was issued on 09 September 2021. The draft reflects the issues raised during statutory consultation and meetings/correspondence on the development of the Scheme design and Environmental Statement. The Applicant never received any feedback from Natural England by Deadline 9 even after chasing emails on 16 September, 23 September, 08 October, 02 November, 01 December 2021 and in January 2022.

It is noted that Natural England have not submitted a Relevant Representation or Written Representation. The Applicant can confirm the following communications with regards designated habitats and protected species:

- Natural England have confirmed that they are in agreement with the findings of this Habitats Regulations Assessment screening as evidenced in the Applicant's Response to Examining Authority's Further Written Questions, October 2021 (**REP3-023**).
- Ghost licence applications for protected species were issued to Natural England in March and April 2021. Letters of No Impediment have been received from Natural England with regards ghost licences for Badgers and Water Voles.
- Engagement on-going to acquire Letters of No Impediment regarding ghost licences for Great Crested Newts and Bats, with further information provided to by Applicant in August 2021 following a request by Natural England in July 2021.

The following sections present a further update on engagement with Natural England post Deadline 9 to manage the Scheme effects on protected species.

Water Voles

On 12th July 2021, Natural England provided a Letter of No Impediment (LONI) to a licence being issued, should the DCO be granted. The following actions are required when submitting a formal conservation licence application:

- a. The following sections of the application form will need to be completely filled in at the point of formal submission: Section 1 (Applicant Details), Section 2 (Agent/Named Ecologist Details), Section 11 (Authorised Individuals) and Section 15 (Declaration).
- b. A suitably experienced named ecologist will need to be proposed at formal submission. Licence reference numbers should be provided to evidence what previous water vole licences the ecologist has been named on.

The Applicant will provide their details and those of the nominated named ecologist within the formal application submission following grant of a DCO, if awarded. The named ecologist will provide relevant conservation licence reference numbers within the application form.

Confirmation of works timings and receptor site locations will also be included within the formal submission and highlighted in the relevant section of the application.

Badgers

On 12th July 2021, Natural England provided a Letter of No Impediment (LONI) stating that Natural England "is content that the draft licence application is of the required standard" and sees no impediment to a licence being issued, should the DCO be granted. The following actions are required when submitting a formal conservation licence application:

Application Form

- a. *The following sections of the application form will need to be completely filled in at the point of formal submission: Section 1 (Applicant Details), Section 2 (Agent/Named Ecologist Details), Section 11 (Authorised Individuals) and Section 15 (Declaration).*
- b. *A suitably experienced named ecologist will need to be proposed at formal submission. Licence reference numbers should be provided to evidence what previous badger licences the ecologist has been named on.*
- c. *Given the time that has elapsed since the previous survey, updated surveys of badger activity across the site will be required prior to formal submission. Natural England recommends surveying in early spring or late autumn when badgers are most active and there is less potential for vegetation to constrain the survey.*
- d. *A walkover survey must be undertaken within 3 months prior to the submission of the licence application to ensure the survey information remains accurate.*
- e. *In addition to relying on field signs to determine whether a sett is in current use (e.g. fresh spoil, footprints, hairs, bedding etc.) additional monitoring techniques should be utilised to assist in determining sett activity and sett classification.*
- f. *Information gathered from field signs and monitoring (as described above) needs to be provided at formal submission to support sett classifications.*
- g. *If a main sett is to be closed then a bait marking survey will be required to identify the best site for a replacement of an artificial sett.*
- h. *If it is assumed that there are alternative setts used by the same badger social group nearby which badgers could move to if a sett is destroyed, evidence needs to be provided to support this.*
- i. *Information must be provided in the formal application regarding the likely territorial boundaries of the different badger social groups and an assessment made as to how the new road scheme will impact connectivity to setts and foraging habitat / watering areas.*

Figures

- j. *The Survey Results Figure must be amended prior to formal submission to include a radius depicting the survey area.*
- k. *An impact map must be provided at formal submission to show the impacts of the scheme in relation to the location of badger setts / foraging grounds / watering areas.*
- l. *The location of setts, latrines and badger runs must be plotted on an updated survey map.*

The Applicant will provide their details and those of the nominated named ecologist within the formal application submission following grant of a DCO, if awarded. The named ecologist will provide relevant conservation licence reference numbers within the application form.

The information requested by Natural England will be provided in a formal submission. Updated badger surveys were completed in March 2022 and a pre-licence survey and period of monitoring has been taking place in June 2022. The pre-licence survey will identify a suitable location for any necessary mitigation. A wider badger survey was undertaken in June to understand the status of one of the setts, to confirm the correct level of mitigation is provided and identify the other setts which may be present in the wider territory. At this stage it is not considered necessary to undertake any territory

assessment. The licence application will be submitted to Natural England for their approval, shortly after the DCO is granted, for the July – November 2022 licence period.

Great Crested Newts

In order to reduce the risk of programme delays due to uncertain trapping periods, which are weather dependent, between DCO approval and winter stopping trapping, during 2022 the Applicant has been engaging with the Natural England District Level Licensing team to seek approval to use a District Level Licence approach to managing risks to GCN

A draft District Level Licence (DLL) was issued to Natural England, who responded with a request for a plan and further details about the impacts to the ponds.

A GCN waterbody assessment was issued to Natural England in February 2022.

Meetings between Natural England and the Applicant's Ecologist were held on the 11 April and 29 April 2022 to discuss the DLL.

Following these meetings Natural England have provided the key outputs for the A47 North Tuddenham to Easton DLL impact assessment based on the GCN waterbody assessment. The Applicant will support Natural England to resolve the final details and prior to DCO determination.

A final DLL application with new GCN waterbody assessment will be submitted to Natural England for formal approval following grant of a DCO, if awarded.

Bats

Natural England's Wildlife Advisor provided a further information request via email on the 3rd February 2022. The email requests the following information is required when submitting a formal conservation licence application:

- a. *A suitably experienced named ecologist will need to be proposed at formal submission. Licence reference numbers should be provided to evidence what previous badger licences the ecologist has been named on.*
- b. *An assessment of the potential impact of removing trees and hedgerows at the crossing points.*
- c. *Confirmation of the number and location of any outstanding bat surveys to be completed, the number and location of trees, hedgerows and other habitat to be removed or impacted. It would be useful to show the location of habitat/tree removal as an overlay on the bat activity and crossing point map.*
- d. *Figure E3 to be provided showing the locations and types of bat boxes to be installed, the location and types of trees, hedgerow and other habitat to be planted. The current survey data (from 2019) can be used to estimate the number and type of bat roosts that may be lost due to tree/habitat clearance.*
- e. *Consideration for the use of licensing policy 4 to cover the eventuality of tree roosts being missed in surveys due to the difficulty of obtaining accurate tree surveys in woodland.*
- f. *As there are Annex II bat species on the site (barbastelle), temporary measures may be required to compensate for any significant severance of flight routes and habitat connectivity.*
- g. *Compensation plan, with bat box plan to include at least 4 suitable bat boxes for each maternity tree roost, two bat boxes for the loss of a non-maternity tree roost*
- h. *consider opportunity for veteranisation of trees and removing branches with bat roost features (PRF's) then attaching them to the retained trees on site.*

The Applicant will provide their details and those of the nominated named ecologist within the formal application submission following grant of a DCO, if awarded. The named ecologist will provide relevant conservation licence reference numbers within the application form.

The information requested by Natural England will be provided in a formal submission following grant of a DCO, if awarded. Updated bat survey information (item b) is being collected in 2022 for all trees being lost and an assessment of severance for known retained bat roosts and important flight corridors will be provided with the licence application. Plans with the location of known bat roosts, trees to be lost and details of the type of roost, type and number of each bat species using the roost will also be provided (items c and d). Mitigation measures for the loss of roosting bats will be provided in line with Natural England compensation request (items d, g and h). Online flight corridor surveys, in line with relevant survey methodology guidance, and building surveys at known roosts are also being updated in 2022 to provide robust information for the habitat severance assessment (items b and f). Appropriate mitigation, including hop-overs, deflection bat fencing and planting proposals (as part of the final landscaping design) will be submitted with details as part of the bat licence application. Delivery of the planting proposals will also be managed under draft DCO Requirement 5 'Landscaping' (**APP-017**) and the detailed Landscape and Ecology Management Plan (LEMP), which forms Appendix B.5 of the Environmental Management Plan (**APP-143**) under draft DCO Requirement 4 'Environmental Management Plan' (**APP-017**).