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# Bramford to Twinstead Reinforcement

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Environmental Management and Mitigation

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# 16. Environmental Management and Mitigation

## 16.1 Introduction

- 16.1.1 As described throughout this Environmental Statement (ES), the design of the Bramford to Twinstead Reinforcement ('the project') has been progressed taking account of identified environmental constraints and considerations. This iterative approach has enabled avoidance or reduction of potential environmental effects during construction and operational phases.
- 16.1.2 A number of embedded and good practice measures have been adopted and referenced to avoid and reduce the likely significant effects that would be experienced during implementation of the project. These include legislative and regulatory measures that would apply and include, for example, ecological licences granted by Natural England and various permits relating to water and waste granted by the Environment Agency.
- 16.1.3 The project has also identified two additional categories of measures. These are:
- **Embedded measures** – measures that are intrinsic to and built into the design. These are given a prefix of EM in the ES then the relevant geographical section (e.g. AB: Bramford Substation/Hintlesham), followed by a unique number (e.g. EM-AB01 is the first embedded measure identified in Section AB: Bramford Substation/Hintlesham). They include the avoidance of designated sites through sensitive routeing, siting and design. The embedded measures are set out in the Register of Environmental Actions and Commitments (REAC) (**application document 7.5.2**); and
  - **Good practice measures** – measures that are known to be effective at addressing adverse impacts and are widely accepted and implemented by the energy and construction sectors. These are given a unique reference number in the ES based on the aspect. For example, general good practice measures are identified with a GG prefix, whereas the topic specific ones are given a prefix based on the topic initials (e.g. landscape and visual measures are referenced as LV01, LV02 etc). These measures are set out within the Code of Construction Practice (CoCP) (**application document 7.5.1**) with which the construction contractors would have to comply.
- 16.1.4 The environmental topic chapters of this ES (Chapters 6 to 14) have assessed the proposals taking into account embedded and good practice measures, and the outcome of these assessments then informed the need for any additional mitigation to avoid or reduce significant effects. Additional mitigation measures are given a prefix of 'EIA' in the ES, followed by a unique reference number based on the topic, for example B01 is the additional mitigation measure for biodiversity. Further information on this approach is provided in ES Chapter 5: Environmental Impact Assessment (EIA) Approach and Method (**application document 6.2.5**).

## 16.2 Securing Mechanisms for Environmental Measures

16.2.1 This chapter summarises the range of securing documents and outlines what is included within each including the different environmental measures outlined above. All measures are secured in one of the documents listed in Table 16.1. ES Figure 16.1: Embedded Measures and Mitigation Proposals (**application document 6.4**) shows the location of specific embedded measures and additional mitigation identified for the project.

**Table 16.1 – Securing Documents for Environmental Mitigation and Best Practice Measures**

Title of document	Description
<p>Construction Environmental Management Plan (CEMP) (<b>application document 7.5</b>)</p> <p>Secured through Requirement 4 in the draft Development Consent Order (DCO) (<b>application document 3.1</b>)</p>	<p>Sets out site-specific measures and construction methodologies that are required to help avoid or reduce potential effects of the project on the environment during construction.</p> <hr/> <p>Appendix A: CoCP (<b>application document 7.5.1</b>). This contains the standard good practice measures that would be undertaken during detailed design and construction of the project if it is granted consent.</p> <hr/> <p>Appendix B: REAC (<b>application document 7.5.2</b>). This contains the full list of embedded measures that have been embedded in the design at the point of application. It also includes the list of additional mitigation measures that have been identified to avoid or reduce a significant effect during the EIA.</p>
<p>Construction Traffic Management Plan (CTMP) (<b>application document 7.6</b>)</p> <p>Secured through Requirement 4 in the draft DCO (<b>application document 3.1</b>)</p>	<p>Sets out the proposed site-specific measures and construction methodologies that are required to help avoid or reduce potential effects of the project on the environment, in particular the local road network and public rights of ways during construction.</p>
<p>Materials and Waste Management Plan (MWMP) (<b>application document 7.7</b>)</p> <p>Secured through Requirement 4 in the draft DCO (<b>application document 3.1</b>)</p>	<p>Sets out project-specific measures that would be employed to reduce the consumption of raw materials and to use the mitigation hierarchy for waste as part of reducing waste sent to landfill.</p>
<p>Landscape and Ecological Management Plan (LEMP) (<b>application document 7.8</b>)</p> <p>Secured through Requirement 4 in the draft DCO (<b>application document 3.1</b>)</p>	<p>Sets out how landscape and ecological features such as landform, watercourses, vegetation (including trees) and habitats would be protected and managed during construction. It also sets out how land, vegetation and habitats would be reinstated following construction together with the subsequent aftercare and, where applicable, monitoring.</p> <hr/> <p>Appendix A: Vegetation Retention and Removal Plan (<b>application document 7.8.1</b>). This contains the plans showing the vegetation that would be retained and removed on the project.</p>

Title of document	Description
<p>Appendix A is also secured through Requirement 8 in the draft DCO (<b>application document 3.1</b>).</p> <p>Appendix B is also secured through Requirement 9 and 10 in the draft DCO (<b>application document 3.1</b>).</p>	<p>Appendix B: Vegetation Reinstatement Plan (<b>application document 7.8.2</b>). This contains the plans showing the vegetation reinstatement and additional planting that is proposed to be implemented at the end of construction.</p> <p>Appendix C: Planting Schedules (<b>application document 7.8.3</b>). This contains the planting schedules that are proposed on the project. These should be read in conjunction with Vegetation Reinstatement Plan in Appendix B of the LEMP.</p>
<p>Archaeological Framework Strategy (<b>application document 7.9</b>)</p> <p>Secured through Requirement 6 in the draft DCO (<b>application document 3.1</b>)</p>	<p>Sets out the principles for the scope of pre-application archaeological desk based and field surveys and the proposed outline scope for post-application field surveys and archaeological mitigation strategy should development consent be granted.</p>
<p>Outline Written Scheme of Investigation (<b>application document 7.10</b>)</p> <p>Secured through Requirement 6 in the draft DCO (<b>application document 3.1</b>)</p>	<p>Builds on the Archaeological Framework Strategy and seeks to provide the parameters by which the archaeological mitigation would be undertaken, including providing initial details on where the mitigation would be applied and how this would be implemented, with reference to future Detailed Written Scheme of Investigations.</p>

## 16.3 Environmental Management Post-Consent

- 16.3.1 Subject to gaining development consent, National Grid would include documents listed in Table 16.1 in the contract documents when procuring a construction contractor. The contractor would be required to comply with the measures set out within management plans when they implement the project.

## 16.4 Monitoring

- 16.4.1 As noted in ES Chapter 5: EIA Approach and Method (**application document 6.2.5**), the EIA Regulations 2017 in Schedule 4, paragraph 7 refers to identifying monitoring arrangements, where appropriate, where significant effects have been identified. No specific monitoring has been identified as being required in relation to significant effects, as the additional mitigation proposed has been demonstrated to be effective on other large infrastructure projects.
- 16.4.2 Regulation 21 of the EIA Regulations 2017 also state that '*when deciding whether to make an order granting development consent for EIA development the Secretary of State must...consider whether it is appropriate to impose monitoring measures.*' No specific monitoring measures have been identified as being required under the EIA Regulations 2017, as the additional mitigation proposed has been demonstrated to be effective on other large infrastructure projects. However, this decision would ultimately lie with the Secretary of State if and when the Order is made.

16.4.3 The LEMP (**application document 7.8**) sets out the need for other monitoring (site inspections) not covered by the EIA Regulations 2017 that would be undertaken. This would include inspections at habitats within ecologically designated sites that are affected by the project during construction to check that habitats are returning to their pre-construction condition as per the assumptions in the ES. Further checks may also be required by the conditions of protected species licensing. The scope of the protected species monitoring would be set out in the final European Protected Species licence applications and would be agreed with Natural England. Any corrective actions that may be required would be discussed with Natural England and implemented as required.

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