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Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.2.2: Applicant's Response to Questions Raised at the Preliminary Meeting on 12 September 2023 Regarding the Temporary Access Route off the A131

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Executive Summary

National Grid Electricity Transmission plc (here on referred to as the Applicant) has made an application for development consent to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The Bramford to Twinstead Reinforcement ('the project') would be achieved by the construction and operation of a new 400 kilovolt (kV) electricity transmission line over a distance of approximately 29km (18 miles), the majority of which would follow the general alignment of the existing overhead line network.

This report has been prepared in response to points raised by the Examining Authority at the Preliminary Meeting on 12 September 2023. The Examining Authority requested that the Applicant provide a post-meeting note in relation to verification surveys along the proposed temporary access route off the A131 for ecology, arboriculture and soils; and the assumptions made in the Environmental Statement (ES) in relation to best and most versatile (BMV) agricultural land, and an update in respect of the survey of bat roosts in buildings, in particular the residential property Hill View and its associated outbuildings.

In summer 2023 verification surveys were undertaken along the temporary access route off the A131 to confirm the baseline assumptions made in the ES which utilised high quality aerial mapping and other desk-based sources, in the absence of survey data in respect of the temporary access route off the A131. These comprised ecology surveys (UK Habitat Classification, hedgerow, invasive species, ground based bat roost assessment of trees, and badger), arboriculture survey, and soils survey.

The findings of the surveys of the temporary access route off the A131 are consistent with the assumptions that were made in the ES and do not change the assessment conclusions in the ES, as outlined below:

- The habitats verification survey confirmed that the land use is arable land, with low ecological value with no invasive species present. The survey also identified that the ditch network associated with hedgerows were dry or only partially wet at the time of survey, and had low suitability for otter or water vole. These findings align with the assumptions that were made in the ES.
- The hedgerow survey identified three hedgerows that were not classified as 'important' under the Hedgerow Regulations 1997. The ES assumed that all the hedgerows along the temporary access route off the A131 were 'important', therefore the ES assumed a reasonable worst case assessment scenario with respect to the hedgerows.
- The ground-based bat roost assessment of trees identified 10 trees with bat roosting potential (of which eight had low potential and two had moderate potential). These trees are beyond or on the edge of the Order Limits and are unlikely to be removed for the project.
- The badger survey identified no active badger setts. One disused outlier sett and recently used latrines were identified.
- The arboriculture data identified two veteran trees and two high quality trees which all lie outside of the Order Limits. Therefore, the data collected has no impact on the Environmental Impact Assessment conclusions.
- The soil survey surveyed approximately 40% of the length of the temporary access route, and identified the land surveyed as agricultural land classification (ALC) Grade 3a and therefore best and most versatile (BMV) land. The ES assumed that all land within the Order

Limits along the temporary access route off the A131 is BMV land, therefore the ES has assessed a reasonable worst case. Given that the land would be temporarily used for construction purposes and then returned to agricultural use, there would be no permanent loss of BMV land as a result of the temporary access route.

There were difficulties with land access on the date of the soil survey due to the agricultural operations which were taking place, and the survey team were not able to access the full extent of the land associated with the temporary access route off the A131. The surveys are being re-programmed with the relevant landowners and it is anticipated that these will take place week commencing 2 October 2023. However, as discussed above, given that the temporary access road would not lead to the loss of agricultural land, these surveys are not considered necessary for the purposes of the assessment on significant effects.

A preliminary ground-based bat roost potential survey is proposed at Hill View, and the Applicant is intending to undertake this prior to Deadline 2, subject to landowner consent. If a bat roost was present the details would be included in the detailed bat licence subject to the granting of development consent but would not affect the conclusions of the ES.

The report also provides evidence that Natural England was aware of the temporary access route off the A131 both through their feedback on the targeted consultation and also when the draft species licences were issued to them prior to application.

The Applicant is intending to submit the results of the ecology verification surveys, and an updated Arboricultural Impact Assessment, at Deadline 1. The Applicant does not intend to update the ES, as the findings of the verification surveys align with the assumptions that were made in the ES and would not alter the assessment conclusions in the ES.

1. Introduction

1.1 Overview

- 1.1.1 National Grid Electricity Transmission plc (here on referred to as the Applicant) has made an application for development consent to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The Bramford to Twinstead Reinforcement ('the project') would be achieved by the construction and operation of a new 400 kilovolt (kV) electricity transmission line over a distance of approximately 29km (18 miles), the majority of which would follow the general alignment of the existing overhead line network. The application for development consent has moved into the examination stage of the process.
- 1.1.2 The project is located in an area of Essex and Suffolk where there are a number of narrow lanes. In some locations, these lanes are unsuitable for construction traffic, particularly the very large low loading lorries (abnormal indivisible loads) required for the delivery of cables drums to the underground cable locations. The roads are particularly narrow towards the western end of the Order Limits in Section G: Stour Valley and Section H: Grid Supply Point (GSP) Substation. The Applicant has undertaken studies to look at current restrictions on the local road network to compare this to constructing a temporary access route off the A131 which uses a direct route where practicable and that avoided sensitive environmental features identified through a desk study.
- 1.1.3 The studies included:
- A desk study review of the local road network to assess the suitability for abnormal indivisible loads and heavy goods vehicles;
 - A desk study of environmental constraints based on a review of the Multi-Agency Geographical Information System (Defra, 2022), aerial imagery (2021) and other desk based information;
 - A transport feasibility study, undertaken by transportation specialists Wynns in 2012 and 2022, to investigate the availability of suitable routes for cable drum delivery vehicles to where they are required on the project; and
 - Swept path analysis, which highlighted that a number of modifications would be required to the existing local road network.
- 1.1.4 The Applicant considered alternative options including using the local road network, a temporary access route and also a hybrid option comprising part use of the road network and part off-highway temporary access route.
- 1.1.5 The environmental considerations of the different options considered are summarised in Table 3.15 of Environmental Statement (ES) Chapter 3: Alternatives Considered [APP-071] and are shown on Sheet 6 of Figure 3.3: Considered Options in ES Figures [PDA-002]. The need for a temporary access route off the A131 was also informed by consultation feedback at statutory consultation (Spring 2022) on the impacts of construction vehicles using the existing road network. The temporary access route itself was subsequently consulted on at a targeted consultation in autumn 2022. Further details can be found in the Consultation Report [APP-043].

1.1.6 This work concluded that whilst use of the public highway from the A131 could possibly be made to be suitable for proposed cable drum delivery vehicles, significant remedial works would be required at various locations. This option would also require civil design requirements and utility services (telephone poles, and below ground services) to remove any constraints. There would also be potential impacts on other road users and impacts on the surrounding banks and hedgerows. Therefore, a temporary access route off the A131 was identified as the preferred option for construction vehicles accessing the western side of Section G: Stour Valley and the Stour Valley West cable sealing end compound in the application for development consent.

1.2 Purpose Of This Report

1.2.1 The Examination Authority issued a Procedural Decision pursuant to Rule 9 of The Infrastructure Planning (Examination Procedure) Rules 2010 dated 24 July 2023 (the 'Rule 9 Letter') [PD-001]. The Rule 9 Letter requested that the Applicant reviews the Environmental Statement (ES) and wider supporting environmental information that was submitted with the application and draws together and submits a comprehensive, topic-by-topic schedule of any baseline description, field survey information and impact assessment that is still to be provided in relation to the Applicant's proposals to construct a 4km temporary access route off the A131, near Little Maplestead. The Applicant submitted a response to the Rule 9 Letter on the 2 August 2023 [AS-005].

1.2.2 At the Preliminary Meeting on 12 September 2023 the Examining Authority requested that the Applicant provide a post-meeting note in relation to the Applicant's Response to the Rule 9 Letter Dated 24th July 2023 [AS-005] to confirm the following:

- When verification surveys for ecology (including habitats, hedgerows, and protected species (bats, badger, dormouse, otter, and water vole)), arboriculture, and soils along the temporary access route off the A131 would be undertaken and the timetable for submission in to the Examination, whether the ES and related application documents would be updated, and whether the verification surveys would have received the same level and intensity of survey as those surveys undertaken elsewhere on the project.
- Whether the absence of a verification survey along the temporary access route off the A131 has been reflected in Table 7.9 of ES Chapter 7: Biodiversity [APP-075], and whether Table 7.9 needs to be updated once verification surveys have been undertaken.
- The assumptions that were made in the ES in relation to best and most versatile (BMV) agricultural land classification (ALC), both across the Order Limits and along the temporary access route off the A131, and – where no distinction has been made between Grade 3a/b – whether all Grade 3 land has been assumed as BMV.
- Whether the survey of bat roosts in buildings, in particular the residential property Hill View and its associated outbuildings, is still incomplete (as indicated in paragraph 7.5.46 of ES Chapter 7: Biodiversity [APP-075]).

1.2.3 This is the Applicant's response to the questions noted above that were raised at the Preliminary Meeting on 12 September 2023 regarding the temporary access route off the A131. A separate legal note is being prepared in response to the further matter raised by the Examining Authority regarding the adequacy of the environmental impact assessment (EIA) and this will be submitted by the Applicant at Deadline 1.

1.3 Context

- 1.3.1 The purpose of an Environmental Statement (ES) is to present the likely significant effects of a proposed development so that these can be considered by the decision makers as part of the decision as to whether to consent a development. The Institute of Environmental Management and Assessment (IEMA) guidance on Delivering Proportionate Environmental Impact Assessments (IEMA, 2017) indicates '*that EIAs should focus on a proposed development's likely significant environmental effects, rather than any potential impacts*'. Volume 6 of the application for development consent presents the likely significant effects in relation to the project.
- 1.3.2 The baseline environment presented within the ES has been identified through a combination of desk studies, site inspections and surveys to identify potential environmental receptors within a defined study area. Survey effort has been targeted in a way that is proportional to the anticipated risk and potential environmental impacts from construction or operation of the project on the particular environmental receptor and the likely sensitivity of the receptor. This proportional approach means that survey effort is focused where it is required to determine likely significant effects and inform mitigation strategies and therefore whilst the approach is consistent across the project, this does not mean that the same depth of surveys is undertaken for each area of the project. The methodology for baseline data collection is explained in the relevant sections of each chapter. The proportional and risk-based approach is considered to be consistent with current EIA guidance, which seeks to deliver more accessible and fit for purpose ES.

1.4 Structure of This Report

- 1.4.1 Chapter 2 explains the scope of the verification surveys that have been undertaken for the temporary access route off the A131 and how these relate to the baseline survey data presented in the ES and the impact assessment. Chapter 3 provides a short narrative on the Natural England engagement and feedback on the temporary access route off the A131. Chapter 4 provides a conclusion regarding review of the ES assumptions, further survey work for the temporary access route off the A131, and other questions from Preliminary Meeting.

2. Surveys of the Temporary Access Route

2.1 Introduction

- 2.1.1 This Chapter explains the scope of the verification surveys that have been undertaken for the proposed temporary access route off the A131 and how these relate to the baseline survey data presented in the ES and the impact assessment of the project on the identified receptors.

2.2 Ecology Surveys

Purpose of the Surveys

- 2.2.1 The purpose of the ecology surveys are to confirm the habitats and potential for protected species to be present and identify the value of the features potentially affected by the project. This is in line with the requirements to the Guidelines for Ecological Impact Assessment (Chartered Institute of Ecology and Environmental Management (CIEEM), 2019), which would inform the EIA and reinstatement proposals.
- 2.2.2 Verification surveys were completed in August 2023 of the temporary access route off the A131 to confirm the baseline assumptions made within the ES. These comprised UK Habitat Classification survey, invasive species survey, hedgerow survey, ground based bat roost assessment of trees and badger survey. The Applicant is intending to submit the results of the ecology verification surveys into Examination at Deadline 1.

Baseline Data in the Application

- 2.2.3 As stated in paragraph 2.5.1 of ES Appendix 7.1: Habitats Baseline Report [APP-109], it was not possible to survey the temporary access route off the A131 prior to the application being submitted. Instead, the areas were mapped using desk-based techniques, including the use of high-resolution aerial imagery (2021), rather than site survey. Paragraph 2.5.2 of ES Appendix 7.1: Habitats Baseline Report [APP-109] notes that desk study data was used to assess the habitat type and value for the temporary access route off the A131.

Assumptions Used in the ES

Habitats

- 2.2.4 ES Appendix 7.1 Annex A: Habitats Baseline UKHab Descriptions [APP-110] classified the land use of the temporary access route as arable (low ecological value) (see Sheets 12 and 14 of ES Figure 7.1.4 [APP-148]). The generally low value of the habitats present, the limited extent of the proposed works and the temporary nature of the access route, with reinstatement of habitats and hedgerows following construction was assessed as not having significant effects, when taking into account the good practice measures in the Code of Construction Practice [APP-178].

2.2.5 The habitat verification survey has confirmed the baseline assumed within ES Chapter 7: Biodiversity [APP-075] for the temporary access route off the A131 is arable land of low ecological value. The survey also confirmed an absence of invasive non-native species. Therefore, there is no change to the assessment in ES Chapter 7: Biodiversity [APP-075], or to the habitat type (arable land) shown on the Habitats of Protected Species and Important Habitats [APP-014] and ES Figure 7.1.4 [APP-148].

Hedgerows

2.2.6 Appendix 7.5: Important Hedgerow Assessment [APP-115] summarises the baseline for hedgerows. Desk study information, including aerial photographs (2021) and Ordnance Survey mapping, was used to identify hedgerow presence along the temporary access route and to assign a precautionary importance in the ES.

2.2.7 Paragraphs 2.3.2 and 2.3.3 define the criteria that were used to identify hedgerows as 'important' using the archaeology and history criteria. Where the initial desk study identified a hedgerow as important using the archaeology and history criteria, the hedgerow was confirmed as important in the absence of field survey and no further wildlife and landscape effort was deemed necessary.

2.2.8 Within the Order Limits for the temporary access route off the A131 (see ES Figure 4.1 [PDA-002]), a total of 12 hedgerows were identified from the desk study and could not be surveyed in the field. These were: H-G-62; H-G-63; H-G-64; H-G-66; H-G-67; H-H-30; H-H-31; H-H-32; H-H-33; H-H-34; H-H-35; and H-H-36. In the absence of survey data, these hedgerows were all categorised as 'important' under the Hedgerow Regulations 1997 as a worst case i.e. all unsurveyed hedgerows were categorised as important unless there was evidence to confirm they were not. See Table 3.1 of ES Appendix 7.5: Important Hedgerow Assessment [APP-115] and Sheets 12 and 14 of ES Figure 7.1.5 [APP-148].

2.2.9 The results of the verification survey confirmed that three of the hedgerows (H-H-31, H-H-32 and H-H-34) were not important hedgerows under the Hedgerow Regulations 1997. The remaining hedgerows within the Order Limits of the temporary access route (assumed in ES Appendix 7.5: Important Hedgerow Assessment [APP-115] as being important) meet the criteria for important hedgerow.

2.2.10 Table 7.9 in ES Chapter 7: Biodiversity [APP-075] is a summary of all hedgerow impacts within the Order Limits. This already includes the hedgerows along the temporary access route off the A131. The numbers presented in this table were based on a reasonable worst case, that all unsurveyed hedgerows were classed as habitats of principal importance (HPI) and were also important. The results from the verification survey have confirmed that the hedgerows along the temporary access route are HPI but some are not important. Therefore, the overall length of important hedgerows impacted given in the table is in excess (worst case) of what has been confirmed through the verification survey.

2.2.11 ES Chapter 7: Biodiversity [APP-075] has assessed a reasonable worst case scenario for the hedgerows along the temporary access route, therefore it is not intended to update ES Chapter 7: Biodiversity [APP-075], ES Appendix 7.5: Important Hedgerow Assessment [APP-115], ES Figure 7.1.5 [APP-148] and ES Figure 7.5.1 [APP-150] as the assessment conclusions would not change.

Protected Species

Dormouse

- 2.2.12 Paragraph 2.2.3 of ES Appendix 7.8: Dormouse Survey Report [APP-119] notes that a targeted approach was taken with regards to the dormouse surveys with ten survey areas selected across the Order Limits. These are shown on ES Figure 7.8.2 [APP-151] and focused on the proposed underground cable sections, as these were considered to result in the greatest potential impact on suitable dormouse habitat (potential removal of up to 80m wide sections of hedgerow and woodland). Other targeted survey areas included areas where the 2012 survey results were inconclusive.
- 2.2.13 Paragraph 2.2.4 of ES Appendix 7.8: Dormouse Survey Report [APP-119] states that a sampling approach was used elsewhere where the potential for impacts on vegetation would be comparatively less, for example temporary access routes. In locations of known dormouse presence, the assumption was that where one of two connected habitats was surveyed, if dormouse presence is established in one habitat, dormice would also be present in the un-surveyed linked habitat.
- 2.2.14 Dormouse surveys were not completed for hedgerows along the temporary access route off the A131, as there is sufficient existing data from connected habitats identified through field survey and desk study, to presume presence and determine likely significant effects.
- 2.2.15 The predicted impact on dormouse would be low i.e. small gaps in hedgerows at the crossing locations, which would be reinstated following construction. Paragraphs 7.4.9 and 7.4.10 of the Landscape and Ecological Management Plan (LEMP) [APP-182] summarise the additional measures identified for dormouse.
- 2.2.16 As the ES assumed a presence of dormouse in areas not surveyed (including the temporary access route off the A131), there would be no change to the conclusions of the ES.

Bats

- 2.2.17 As stated in paragraph 2.5.2 of ES Appendix 7.7: Bat Survey Report [APP-117], a ground-based assessment of trees for bat roosts of the temporary access route off the A131 was not undertaken due to access restrictions. Therefore, no bat roosts were identified along the temporary access route off the A131 in the ES.
- 2.2.18 The ground-based bat roost assessment of trees verification survey identified 10 trees with bat roosting potential (two moderate potential and eight low potential) within the study area. These trees are beyond or on the edge of the Order Limits and are unlikely to be removed. Eight of the ten trees had low roosting potential identified, and so these trees would not meet the criteria for further climbing surveys. The two trees with moderate potential to support roosting bats would be surveyed as part of the pre-construction programme of ecological survey to inform bat mitigation licencing if they were at risk of being removed during construction. Note that moderate roosting potential does not indicate the potential for a bat roost of high conservation status.
- 2.2.19 No bat commuting or feeding surveys have been undertaken on the project, due to the limited and temporary nature of vegetation loss. This approach to establish the baseline for Appendix 7.7 Annex A: Bat Draft Licence [APP-118] has secured a Letter of No Impediment (LONI) from Natural England.

- 2.2.20 As no additional roosts are anticipated to be removed as a result of the temporary access route at present, there would be no change to the information presented in the draft bat licence in ES Appendix 7.7 Annex A [APP-118]. If this were to change, the details would be added to the final bat licence that would be submitted to Natural England, should development consent be granted. It is not proposed to amend ES Appendix 7.7: Bat Survey Report [APP-117] or ES Figure 7.7.4 [APP-150].

Badger

- 2.2.21 As stated in paragraph 2.4.2 of ES Appendix 7.9: Badger Survey Report [APP-121/122], where site surveys were not undertaken, e.g. the temporary access route off the A131, these areas would be subject to a pre-construction badger survey to inform the final licence. This approach has secured a Letter of No Impediment (LONI) from Natural England for Appendix 7.9 Annex A: Badger Draft Licence [APP-123-124].
- 2.2.22 The badger verification survey confirmed no active badger setts within the survey area. One disused outlier sett and recently used latrines were identified. As such, no change to the draft badger licence in ES Appendix 7.8 Annex A [APP-123/124] is required. It is not proposed to amend ES Appendix 7.8: Badger Survey Report [APP-121/122] or ES Figure 7.9.2 [APP-121/122].

Otter and Water Vole

- 2.2.23 As stated in paragraph 3.1.8 of ES Appendix 7.2: Species Baseline Report [APP-112], for three watercourses (W-G-6, W-G-3/W-G-4 and W-H-20) access was not available and these watercourses were unable to be surveyed. W-H-20 is located within Section G and crosses the temporary access route off the A131. The aerial imagery suggested that these watercourses comprised farm ditches and were unlikely to be of high value for water vole and otter. However, these watercourses were considered to be suitable habitat as a precaution and a reasonable worst case in the ES (see paragraph 3.1.8 of ES Appendix 7.2: Species Baseline Report [APP-112]).
- 2.2.24 The habitat verification survey for the temporary access route confirmed that the ditch network associated with hedgerows were dry or only partially wet at the time of survey and had low suitability for otter and water vole. In the absence of survey data, watercourses across the Order Limits were assumed to be suitable for otter for the purposes of the ES, therefore ES Chapter 7: Biodiversity [APP-075] has assessed a reasonable worst case scenario for the watercourses and there would be no change to ES Chapter 7: Biodiversity [APP-075], ES Appendix 7.2: Species Baseline Report [APP-112] or ES Figure 7.2.1 [APP-149].

Further Surveys Proposed of the Temporary Access Route

- 2.2.25 No further surveys are proposed for ecology along the temporary access route off the A131, other than the pre-construction surveys that would be undertaken across the whole project to supplement the baseline information currently collected for the European Protected Species mitigation licences. The pre-construction surveys are noted in paragraph 2.5.4 of the LEMP [APP-182], which would be secured by Requirement 4 of the draft Development Consent Order [APP-034].

2.3 Arboriculture Survey

Purpose of the Survey

- 2.3.1 The purpose of the arboricultural survey was to record the specific locations of trees, types, age and root protection areas to inform detailed design and reinstatement planting.

Baseline Data in the Application

- 2.3.2 An arboricultural survey was undertaken of the majority of the Order Limits as part of the application and the results were presented in the Arboricultural Impact Assessment (AIA) [APP-067]. Due to access restrictions, the arboricultural survey did not include the temporary access route off the A131.

Assumptions Used in the ES

- 2.3.3 The ES does not rely on the data presented in the AIA [APP-067], as the AIA is more detailed than the information needed to inform conclusions around likely significant effects. Therefore, the results of the arboricultural survey would not change the information presented in the ES. The landscape and ecology chapters of the ES [APP-074 and APP-075] used the LEMP Appendix A - Vegetation Retention and Removal Plan [APP-183] to inform the assessment. LEMP Appendix A had the areas of vegetation affected mapped for the temporary access route based on aerial imagery data.
- 2.3.4 An arboricultural survey has now been completed of the temporary access route. Additional trees and groups of trees were identified as part of this survey. This included two veteran oak trees located in the field boundary between Oak Road and Lorkins Lane, and two high quality features (one oak and a group of elm trees) at the eastern end of the temporary access route. All of these features lie outside of the Order Limits. The information collected during the survey will be added to the figures in LEMP Appendix A at an appropriate deadline.

Further Surveys Proposed of the Temporary Access Route

- 2.3.5 No further arboricultural surveys are proposed of the temporary access route off the A131.

2.4 Soil Survey

Purpose of the Survey

- 2.4.1 The purpose of the soil surveys is to confirm the Defra Agricultural Land Classification grade, particularly in relation to Grade 3a and 3b, where Grade 3a is classed as Best and Most Versatile (BMV) land. The data collected from the soil surveys would inform the detailed soil handling during construction and reinstatement of soil horizons following construction.

Baseline Data in the Application

- 2.4.2 No soil surveys were completed prior to submission of the application for development consent along the temporary access route due to land access restrictions. Given that the impact on the soils along the temporary access route would be temporary and would not lead to loss of agricultural land, it is not considered necessary to carry out soil surveys for the purposes of assessment and post submission surveys provide additional information rather than information required for assessment.
- 2.4.3 The baseline value of the land was based on the Defra Agricultural Land Classification (ALC). Provisional ALC mapping shown on ES Figure 11.2: Provisional Agricultural Land Classification Mapping [APP-153] shows that the land along the temporary access route off the A131 within the Order Limits comprises a mix of Grade 2 and 3. This mapping, at a scale of 1:250,000, does not distinguish between Grades 3a and 3b but provides an indication of the likely land classification.

Assumptions Used in the ES

- 2.4.4 As stated in paragraph 11.4.7 of ES Chapter 11: Agriculture and Soils [APP-079], where soil surveys could not be completed, the assessment has assumed a reasonable worst case, that BMV land is present within the Order Limits. The ES therefore assumed that where the land along the temporary access route was Grade 3 on ES Figure 11.2: Provisional Agricultural Land Classification Mapping [APP-153], this was Grade 3a land (BMV) as a reasonable worst case.
- 2.4.5 Soil verification surveys were completed for approximately 40% of the length of the temporary access route in September 2023. These include the middle section of the temporary access route off the A131 and the area towards the eastern end. The preliminary field investigation indicates that the soil quality is 'good' (i.e. ALC Grade 3a and therefore BMV). The results of the survey would be used to inform the soil handling during construction and reinstatement following construction.
- 2.4.6 As ES Chapter 11: Agriculture and Soils [APP-079] has already assumed a worst case, that all the Order Limits along the temporary access route off the A131 is BMV land, there would be no change to the assessment or conclusions presented in the ES.

Further Surveys Proposed of the Temporary Access Route

- 2.4.7 There were difficulties with land access on the date of the soil surveys in September 2023 due to the agricultural operations which were taking place and the survey team were not able to access the full extent of the land associated with the temporary access route. The surveys are being re-programmed with the relevant landowners and it is anticipated that these will take place week commencing 2 October 2023.

3. Natural England

3.1 Targeted Consultation

- 3.1.1 Natural England was consulted on the temporary access route off the A131 as part of the Targeted Consultation. It responded to the consultation with a letter dated 19 October 2022, as evidenced in the Draft Statement of Common Ground Natural England [APP-169]. Section 1 of their letter noted that the changes include ‘*building a 3.5 km temporary haul road from Sudbury Road (A131) to the Stour Valley west cable sealing end compound to facilitate construction of the reinforcement*’. There are references in their response specifically in relation to the temporary access route. These are in relation to Grade 2 and 3 agricultural land and potential to affect agri-environmental schemes.

3.2 Draft Licences

- 3.2.1 The temporary access route off the A131 has been included in the draft licences for badger [APP-123/124], bats [APP-118] and dormouse [APP-120]. A letter of no impediment has been received from Natural England on badger and bats. The Applicant is updating the dormouse draft licence to address Natural England’s comments and will submit the updated version at an appropriate deadline.

3.3 Relevant Representation

- 3.3.1 The Natural England Relevant Representation [RR-042] only specifically references the temporary access route off the A131 once in relation to the bat surveys programmed for spring 2023. These were the surveys completed in August 2023 as noted in Section 2.2 of this report. The only other reference to the access routes (general) is in relation to soils surveys to inform reinstatement.

3.4 Summary

- 3.4.1 Based on the above evidence, the Applicant considers that Natural England is aware of the temporary access route off the A131.

4. Conclusion

4.1 Review of the ES Assumptions

- 4.1.1 As noted in Chapter 1 of this report, the survey approach taken on the project has been risk-based and proportionate to the anticipated impact. The site surveys have targeted the areas where the desk study information has indicated a sensitivity and/or the impacts from the project could result in significant effects. This means that there has not been a consistent level of survey effort across the project, including the approach to the temporary access route off the A131. This is considered a proportionate approach in line with EIA guidance and focusses on likely significant effects.
- 4.1.2 The verification surveys undertaken during summer 2023 have confirmed that the assumptions made in the ES are either correct or in some cases, such as the important hedgerow assessment, a worst case has been assumed. Therefore, there would be no change to the impact assessment and residual effects concluded in the ES as a result of the verification surveys, and the Applicant will not be updating the ES.
- 4.1.3 This is the Applicant's response to the questions noted above that were raised at the Preliminary Meeting on 12 September 2023 regarding the temporary access route off the A131. A separate legal note is being prepared in response to the further matter raised by the Examining Authority regarding the adequacy of the environmental impact assessment and this will be submitted by the Applicant at Deadline 1.

4.2 Further Survey Work for the Temporary Access Route

- 4.2.1 As noted in Chapter 3 of this document and Table 3.1 of the Applicant's Response to Rule 9 Letter Dated 24 July 2023 [AS-005], no further survey work is proposed for ecology or arboriculture in relation to verification of the baseline in relation to the temporary access route off the A131. As with all major construction projects, pre-construction surveys would be undertaken across the whole project as a check for any changes to the baseline prior to construction commencing. This information would be used to inform the final species licences and any detailed contractor method statements.
- 4.2.2 Soil surveys are planned for the remaining sections of the temporary access route off the A131, where it was not possible to survey at the start of September 2023. The data from these would be used to inform construction activities in terms of soil handling and reinstatement but would not affect the conclusions of the ES.
- 4.2.3 The Applicant is intending to submit the survey results of the ecology survey and an updated AIA at Deadline 1.

4.3 Other Questions From Preliminary Meeting

- 4.3.1 A preliminary ground-based bat roost potential survey is proposed at Hill View, and the Applicant is intending to undertake this prior to Deadline 2, subject to landowner consent. If a bat roost was present the details would be included in the detailed bat licence subject to development consent but would not affect the conclusions of the ES.

References

CIEEM (2019) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.

Department for Environment, Food and Rural Affairs (2022) Multi-Agency Geographical Information System (MAGIC). (Online) Available from: <http://magic.defra.gov.uk> (Accessed March 2023)

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