



Suffolk County Council (20041323)

Response to Comments on the Local Impact Report

Bramford to Twinstead (EN020002)

Deadline 4

16 November 2023

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Glossary of Acronyms

| | |
|-------------|---|
| <i>AONB</i> | <i>Area of Outstanding Natural Beauty</i> |
| <i>AQMA</i> | <i>Air Quality Management Area</i> |
| <i>BMV</i> | <i>Best and Most Versatile Agricultural Land (Grades 1, 2 & 3a)</i> |
| <i>CTMP</i> | <i>Construction Traffic Management Plan</i> |
| <i>DCO</i> | <i>Development Consent Order</i> |
| <i>EIA</i> | <i>Environmental Impact Assessment</i> |
| <i>ES</i> | <i>Environmental Statement</i> |
| <i>LHA</i> | <i>Local Highways Authority</i> |
| <i>NPS</i> | <i>National Policy Statements</i> |
| <i>PROW</i> | <i>Public Rights of Way</i> |

SuDS Sustainable Drainage Systems

“The Council” / “SCC” refers to Suffolk County Council; “The Host Authorities” refers to Suffolk County Council, Babergh and Mid Suffolk District Councils, Essex County Council, and Braintree District Council.

Purpose of this Submission

The purpose of this submission is to provide responses to the Applicants Document titled “8.5.3.1: Applicant’s Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Reports” [REP3-049]. The Local Impact Report [REP1-045], including its Annexes A to F [REP1-044], was submitted at Deadline 1 (D1). Examination Library references are used throughout to assist readers.

1 Responses to Comments on the Joint Local Impact Report [REP1-045]

Overview

Chapter 1 – Introduction

| Table 1: Chapter 1 - Introduction | | | |
|--|--------------|--|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 1a | Introduction | Para. 2.1.1 No comments. | SCC (Planning) notes that the Applicant has no comments to make in respect of this chapter. |

Chapter 2 – Terms of Reference

| Table 2: Chapter 2 – Terms of Reference | | | |
|--|--------------------|--|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 2a | Terms of reference | Para. 2.1.1 No comments. | SCC (Planning) notes that the Applicant has no comments to make in respect of this chapter. |

Chapter 3 – Description of the Area with Reference to the Proposed Development

| Table 3: Chapter 3 – Description of the Area with Reference to the Proposed Development | | | |
|--|--------------|---|--|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 3a | Stour Valley | Table 2.1 Description refers to affected parts of the Stour Valley being designated as an AONB, which is incorrect. | SCC (Planning) is referring to the wider area which does include parts of the Stour Valley which are designated as an AONB. For the avoidance of doubt, SCC is not suggesting that parts of the Stour Valley Project area form part of the designated AONB but is making the point that the River Stour (and its associated river valley) flows through parts of the AONB. |

Chapter 4 – Policy Context

| Table 4: Policy Context | | | |
|--------------------------------|--------------|---|--|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 4a | Draft EN-3 | Table 2.1 Decision should be based on extant NPS EN-1 and EN-5 albeit that emerging NPS are relevant and important matters. | SCC (Planning) agrees that draft NPS are relevant and important considerations. Further, SCC considers that the decision on this project should be taken having full regard to the imminent revisions of NPS EN-1 to EN-5, albeit acknowledging that they do not replace the extant versions of EN-1 or EN-5 for the purposes of section 104 of the Planning Act 2008. |

Chapter 5 – Other Relevant Local Policy

| Table 5: Chapter 5 - Other Relevant Local Policy | | | |
|---|--------------|--|--|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 5a | Policy | Table 2.1 The extant NPS are the primary policy context. | SCC (Planning) agrees although the Development Plan is a material consideration, that the NPS are the primary policy context; however, the as noted in 4a in Table 4 above, the imminent revisions of NPS EN-1 to EN-5 should be taken into account as relevant and important matters for the purposes of the decision on this project. |
| 5b | Policy | Table 2.1 The Applicant welcomes SCC support for the project (so long as impacts are appropriately dealt with). The Applicant maintains that the Environmental Statement informs the necessary mitigation. | SCC (Planning) acknowledges the embedded mitigation in the ES although considers that further mitigation is required to make the proposed development acceptable. |

Impacts by Issue

Chapter 6 – Landscape (Lead Authorities BMSDC)

| Table 6: Chapter 6 - Landscape | | | |
|---------------------------------------|---|--|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 6a | Route alignment, micro-siting and Limits of Deviation | The Applicant disagrees that changes to the alignment within the LoD would result in additional significant landscape and visual effects. | SCC (Landscape) is content that with regards to wider landscape and visual impacts, minor changes to tower locations within the LoD are unlikely to result in new or significant effects. However, this is not the case in relation to the setting of specific assets. |
| 6b | Micro-siting of pylons | <p>Given that changes to pylon locations would not result in new or different significant effects and the LoD have been assessed in the ES, it is not considered appropriate or necessary for the final locations to be agreed with the Councils. However, the Applicant recognises the concerns from the Councils and Historic England in relation to Hintlesham Hall and as a result has revised the commitment EM-AB01 wording to avoid positioning a pylon in the area most visible from the ancillary buildings (see the updated REAC submitted at Deadline 3 (document 7.5.2 (B))).</p> <p>The Applicant does not consider it practicable to involve third parties in the detailed designs and micro-siting of pylons as this will be determined by many factors</p> | <p>Whilst the proposed revision to the REAC to EM-AB01 is a helpful clarification, which provides some reassurance, SCC (Landscape)'s clear preference would be for consultation with the relevant parties on the finalisation of tower locations in the vicinity of Hintlesham Hall to ensure that adverse impacts are minimised.</p> <p>Given therefore, that critical micro-siting of towers is limited to a very small number of locations across the project, SCC (Landscape) does not consider that it is reasonable to cite practicality as a substantial obstacle to engage effectively with third parties concerning a few critical locations.</p> |

| Table 6: Chapter 6 - Landscape | | | |
|--------------------------------|-----------------------------|---|---|
| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| | | involving engineering and safety requirements, landowner requirements as well as environmental constraints. | |
| 6c | Mitigation and compensation | <p>Draft NPS EN-1 (March 2023) recognises that ‘compensation’ is at the bottom of the mitigation hierarchy, it does not itself create any requirement to compensate for residual effects.</p> <p>No justification is provided for the assertion that ‘compensation’ in the form of landscape restoration and enhancement is “required”; it is certainly not ‘required’ by draft NPS EN-1</p> <p>Compensation planting at other locations will not remove the likely significant adverse effects identified within the ES at Burstall and Hintlesham.</p> <p><i>‘The LEMP (document 7.8 (B)) contains all the planting required to make the project acceptable, including the embedded and best practice measures (including planting embedded into the design of the project and reinstatement planting) and additional mitigation as well as biodiversity compensation planting and landscape softening (EN-5). This includes the planting required across all disciplines.’</i></p> | <p>The definition in Draft NPS EN-1 states that ‘mitigation hierarchy’ is “A term to incorporate the avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity.” This hierarchy is repeatedly referenced in draft EN-1 and there is a clear expectation that it is followed (see for instance paras 4.1.5 and 4.2.4). It is also apparent from the reference to the mitigation hierarchy in para 3.3.6 that the weighing of benefits against residual impacts is a step that follows <i>after</i> the application of the hierarchy in relation to impacts that are not capable of being addressed by the hierarchy. Thus, where adverse impacts can be addressed or offset by the provision of compensatory measures (which would be a part of the mitigation hierarchy), those impacts would not need to be treated as residual impacts for the purpose of being weighed against benefits. The Council considers that this implies that the process the Applicant <u>needs to go through</u> does include applying measures of compensation, where avoidance, reduction and mitigation are not capable of sufficiently mitigating adverse effects resulting from the scheme.</p> <p>Compensation planting does not have the purpose to remove the likely residual effects but to improve and enhance the condition and fabric of the wider landscape around those residual impacts.</p> |

| Table 6: Chapter 6 - Landscape | | | |
|---------------------------------------|---|--|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| | | Later, the Applicant states (at ref.6.168-171, Management and Maintenance (Aftercare): <i>'Areas of planting proposed for biodiversity net gain, as described in the Environmental Gain Report [APP-176] would be subject to a 30-year management plan.'</i> | Regarding the final point, SCC (Landscape) considers it would be helpful if this was pointed out in the LEMP. |
| 6d | Compensation to allow for landscape restoration | | SCC (Landscape) agrees with the Applicant that some of the residual effects would not be <u>mitigated</u> through additional planting at these locations. This is the precise reason, why SCC considers compensation measures necessary, which, while not mitigating residual visual and landscape effects resulting from the scheme, would serve to improve and enhance the fabric and the condition of the landscape as a whole, to <u>compensate</u> for the residual adverse impacts, where it has been affected by the scheme. |
| 6e | BNG and Monitoring | The Applicant states that MM09 would be maintained and managed for <i>up to</i> 30 years due to its importance for connectivity. | <p>SCC (Landscape) understands from the comments by the applicant that measures to ensure Biodiversity Net Gain will be dealt with separately in a standalone 30-year Management Plan.</p> <p>SCC (Landscape) assumes that the duration of maintenance would depend on regeneration success, but would be grateful for further clarification, under which circumstances less than 30 years' maintenance would be envisaged to be sufficient by the Applicant.</p> |
| 6f | Hedgerows | Table 7.9 in ES Chapter 7: Biodiversity [APP-075] provides a summary of permanent loss, | SCC (Landscape) considers that the text of the LEMP should include tables that clearly quantify the vegetation losses for each |

| Table 6: Chapter 6 - Landscape | | | |
|---------------------------------------|--------------|---|--|
| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| | | <p>temporary loss, coppiced and pruned hedgerow Habitat of Principal Importance (HPI). Table 7.10 provides a summary of permanent and temporary Non Woodland HPI Impacts. ES Chapter 7: Biodiversity [APP-075] concludes that there are no significant effects in relation to other habitats, once habitats have been reinstated, as shown on Appendix B: Vegetation Reinstatement Plans [APP-184]. All habitats affected have been quantified as part of the Defra Metric 3.1 presented in the Environmental Gain Report [APP-176].</p> <p>LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183] shows all of the trees and hedgerows which would be affected by the works based on the Proposed Alignment shown on the General Arrangement Plans. Locations of proposed planting are shown on LEMP Appendix B Vegetation Reinstatement Plan (document 7.8.2 (B)) and planting schedules at LEMP Appendix C: Planting Schedules [APP-185].</p> <p>The location of vegetation loss in terms of project section is not linked to or used to derive significance of effects therefore this</p> | <p>of the project’s sections and in total, such as numbers of trees lost for each tree category (including trees lost for temporary or permanent access and visibility splays), lengths in metres of hedgerows lost (differentiating between important and non-important hedgerows under the Hedgerow Regulations 1997 and including hedgerows lost to permanent access and visibility splays). SCC (Landscape) does not consider it sufficient for the vegetation losses to be depicted on the Vegetation Removal and Management Plan [APP-183].</p> |

| Table 6: Chapter 6 - Landscape | | | |
|--------------------------------|---------------------|--|---|
| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| | | level of detail is not required as part of the ES. | |
| 6g | Environmental Areas | <p>As stated in paragraph 8.2.1 of the LEMP (document 7.8 (B)), the Vegetation Reinstatement Plan in Appendix B (document 7.8.2 (B)) shows the location of proposed embedded planting at the GSP substation and around the cable sealing end (CSE) compounds, reinstatement planting, landscape softening, habitat compensation and additional planting required to mitigate an environmental effect.</p> <p>Environmental Areas as identified in the Environmental Gain Report [APP-176] are areas in which enhancement planting has been identified (not mitigation). The enhancement planting shown in the Environmental Gain Report is not included within the Management Plans as it will be delivered by alternative mechanisms outside of the main construction works with the evidence provided in accordance with Requirement 13 of the draft DCO (document 3.1 (C)). BNG is covered within the Environmental Gain Report [APP-176] and is secured via Requirement 13 (Biodiversity Net</p> | <p>There is no detailed information regarding the planting around the CSE compounds.</p> <p>While the Environmental Areas may be dealt with separately, it is difficult to gauge their contribution to visual mitigation. Requirement 13 Biodiversity Net Gain (BNG) of the Draft DCO (document 3.1 (C)) [REP3-008] does not appear to secure an individual and stand-alone implementation and 30-year management plan (separate from the LEMP).</p> |

| Table 6: Chapter 6 - Landscape | | | |
|---------------------------------------|--|---|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| | | Gain (BNG)) of the draft DCO (document 3.1 (C)). | |
| 6h | Residual impacts | Here and elsewhere, the Applicant states: <i>Requirement 9 (reinstatement planting plan) of the draft DCO (document 3.1 (C)) prevents any stage of the authorised development from being brought into operational use until a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated during that stage has been submitted to and approved by the 'relevant planning authority'. The reinstatement planting plan must be in general accordance with the LEMP (document 7.8 (B)) approved under Requirement 4. Therefore, 'the relevant planning authorities' would have further input to the planting proposals, should these change, prior to implementation.</i> | SCC (Landscape) is not reassured by this statement, as the LEMP or Outline LEMP will set the parameters for any further planting plans. Therefore, while fine-tuning may be possibly and should be built into the control documents, it is of paramount importance that these control documents are brought to an agreed standard prior to consent being granted. |
| 6i | Residual impacts CSCE Alphamstone | 1.1. | SCC (Landscape) does acknowledge the restrictions that not trees can be planted over underground cables, but does not follow the Applicant's explanation that <i>no planting</i> can be provided due to underground cables to the south of the CSE compound at Alphamstone, when elsewhere hedges can be reinstated over cables. |
| 6j | Landscape planting mitigation proposals, including | The Applicant states (p.26): <i>ES Chapter 6: Landscape and Visual [APP-074] identifies the significant effects and the</i> | Regarding the first point, this is the precise reason why SCC (Landscape) considers compensation measures necessary. |

| Table 6: Chapter 6 - Landscape | | | |
|---------------------------------------|------------------------------------|---|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| | timing, management and maintenance | <p><i>mitigation proposed. It is acknowledged that during operation, there would be long term significant adverse effects on LCA2: Suffolk Ancient Plateau Claylands, Burstall and Hintlesham community areas as the benefits of removing the existing 132kV overhead line would be outweighed by the presence of the new 400kV overhead line. As the effects are from the introduction of the 400kV overhead line, these cannot be fully mitigated.</i></p> <p>Further, the Applicant states: <i>No other adverse significant effects have been identified during operation and therefore no requirement for additional mitigation of effects.</i></p> | Concerning the second point, SCC (Landscape) considers that an accumulation of non-significant effects can overall be significant and require mitigation or compensation (Suffolk Joint LIR [REP1-045] , paragraph 6.110 and 6.128). |
| 6k | Timing of Reinstatement Planting | <p>Reinstatement planting would only be undertaken once works have been completed at a location (including testing). Otherwise, there is a risk that the Main Works Contractor would damage or need to remove vegetation planted.</p> <p>Paragraph 8.2.2 of the LEMP (document 7.8 (B)) states that reinstatement planting will be undertaken during the planting season.</p> | SCC (Landscape) urges the Applicant to take changing weather patterns into consideration, when the defining planting seasons. |

| Table 6: Chapter 6 - Landscape | | | |
|---------------------------------------|----------------------------|--|--|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 6l | Management and Maintenance | | <p>Regarding MM09, SCC (Landscape) would query whether this would be maintained under the LEMP for up to 30 years.</p> <p>While the purpose of the Vegetation Reinstatement planting is to replace what is removed, this is not entirely achievable for any removed mature trees, and therefore SCC (Landscape) does not consider it acceptable that mature trees are replaced with only one new tree. The usual ratio for replacement of mature trees in 3:1.</p> |

Chapter 7 – Biodiversity (Lead Authorities BMSDC)

| Table 7: Chapter 7 - Biodiversity | | | |
|--|--------------|--|---|
| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| 7a | | | SCC (Ecology) defers to Babergh and Mid Suffolk District Councils in relation to ecology matters. |

Chapter 8 – Historic Environment (Historic Built Environment Lead Authorities BMSDC, Archaeology Lead Authority SCC)

| Table 8: Chapter 8 – Historic Environment | | | |
|--|---------------------------------|--|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 8a | Construction phase comments | "The impacts on archaeological remains would be mitigated through the measures set out within the OWSI [AS-001]" | SCC (Archaeology) note that the OWSI in its current form is not an approved document. |
| 8b | Decommissioning phase impacts | "Table 4.9 in ES Chapter 4: Project Description [APP-072] states that the footprint of any decommissioning works is likely to be smaller than the ground disturbed during construction of the project" | <p>SCC (Archaeology) note that there needs to be the appropriate level of archaeological assessment to determine the physical impact of decommissioning and associated works. There will be compounds/storage areas and access routes that will be required to facilitate the decommissioning of existing pylons. This will have an additional impact beyond the areas of the pylon being decommissioned.</p> <p>Currently as the OWSI stands there is no provision for post-determination trenched archaeological evaluation to appropriately assess the impacts of pylon decommissioning.</p> |
| 8c | Written Scheme of Investigation | The OWSI [AS-001] sets out the proposed mitigation on the project in relation to archaeological remains. | <p>SCC (Archaeology) note that the OWSI has not been approved by SCCAS. Amendments are required to the document. SCCAS would advise that a meeting is organised between the applicant, SCCAS and Essex Place Services to discuss the requirements of the OWSI.</p> <p>Archaeological mitigation within the proposed scheme cannot be determined until the information from trenched archaeological evaluation has been made available.</p> |

| Table 8: Chapter 8 – Historic Environment | | | |
|--|---------------------------|--|--|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| | | | Currently only summary reports for stages 1-4 within the undergrounding section of the scheme have been sent to SCCAS for review, as summary reports these do not contain results of scientific analysis. When the evaluation reports have been approved by SCCAS the results will need to be combined with the of the geophysical survey data and the combined information will need to be included within the OWSI when discussing archaeological mitigation within the undergrounding area. |
| 8d | Micrositting of pylons | As stated within paragraph 2.4.2 of the CEMP (document 7.5 (B)) subject to the grant of the DCO [...] the applicant will employ environmental specialists (included but not limited to ecologist, archaeologist and landscape architects) to advise on the design of refinements and the micro-sitting of project components within the LoD. | <p>SCC (Archaeology) would note that because pylon locations are not yet determined, there needs to be provision for archaeological assessment, by post-determination trenched archaeological evaluation to assess whether below-ground heritage would affect or influence micro-sitting of the pylons. As well as the need for and scope of any further archaeological work based on the results of the archaeological evaluation, such as open area excavation prior to the construction of the pylon base.</p> <p>Currently as the OWSI stands there is no provision for post-determination trenched archaeological evaluation.</p> |
| 8e | Archaeological evaluation | The overhead lines would require less disturbance of soil, within excavations. | SCC (Archaeology) note that the pylon working areas as indicated by 2.11.11 Design and Layout Plans Pylon Working Area are 80mx80m for tension (angle) pylon and 40mx40m for suspension (line) pylon. Within the working area will contain pylon base (30mx30m), crane pad (15mx15m), pylon assembly area (20mx17m or 20mx10m) as well as areas for parking, |

| Table 8: Chapter 8 – Historic Environment | | | |
|--|---|--|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| | | | <p>cabins, storage containers and welfare. All of which will have an impact on below-ground heritage which may exist.</p> <p>SCC (Archaeology) are concerned that there is no provision for further evaluation particularly within the over-head sections of the scheme relating to work required on the pylon sites and haul roads. As pylon locations are not yet determined, post-determination trenched archaeological evaluation within the overhead sections would accurately quantify the archaeological resource, both in quantity and extent and allow for decisions on the location/micro-setting of the pylon within the LoD as well as the need for, and scope of any further work based on the results of the evaluation, such as open area excavation prior to the construction of the pylon base.</p> <p>Post-determination archaeological evaluation would also be used to catch any areas that were not possible to trench up-front due to health and safety and ecological constraints, as well as serve as a contingency for areas where upfront archaeological evaluation is shown to be lacking, to aid in the formulation of mitigation strategies.</p> |
| 8f | Outline Written Scheme of Investigation | | SCC (Archaeology) would advise the applicant to organise a meeting with SCCAS and Essex Place Services to discuss the amendments for the OWSI. |
| 8g | Draft DCO and a DWSI | | SCC (Archaeology) are concerned as there is no provision for reporting or archiving, having the following condition wording: |

| Table 8: Chapter 8 – Historic Environment | | | |
|--|--------------|--|--|
| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| | | | <p><i>“(5) Within a date of three years from breaking ground on construction, post-investigation assessment must be completed for all stages in accordance with the programme set out in the OWSI and the Detailed written schemes of investigation, and provision made for analysis, publication and dissemination of results and archive deposition secured in accordance with a scheme-wide Updated Project Design and timetable that has been submitted to and approved by the Local Planning Authority.”</i></p> <p>Having the above would allow for a defined timescale for submission of the post-excavation assessment report (PXA) and submission of an updated project design (UPD) which will detail the requirements of final reporting and publication resulting from the work undertaken to the point of PXA. As the work required for producing a final reporting and publication is unknown, until the point of PXA, the OWSI can only detail the baseline requirements of reporting following on from the submission of the PXA.</p> <p>The UPD would detail the level of further analysis required to produce the final report and publication generated from the archaeological fieldwork undertaken.</p> |

Chapter 9 – Water Environment (Lead Local Flood Authority SCC)

| Table 9: Chapter 9 – Water Environment | | | |
|---|--------------|--|---------------------------------------|
| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| 9a | Flooding | Table 6.1 Issues covered within application. | SCC (Floods) has no further comments. |

Chapter 10 – Geology and Hydrogeology (Minerals & Waste Planning Authority SCC)

| Table 10: Chapter 10 – Geology and Hydrogeology | | | |
|--|------------------------------|--|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 10a | Local resources & facilities | Table 7.1 The applicant will seek to use local mineral resources and waste facilities. | SCC (Planning) acknowledges this as a positive statement. |
| 10b | Stour Valley designation | Table 7.1 The part of the proposed development within the Stour Valley is not within the Dedham Vale AONB. | SCC (Planning) agrees, although would point out that this area is considered to be part of the setting of the Dedham Vale AONB. |
| 10c | Decommissioning impacts | Table 7.1 Applicant has no comments in respect of the LIR assessment of decommissioning impacts. | SCC (Planning) notes that the Applicant has no comments in this respect. |
| 10d | Minerals Excavation | Table 7.1 No extraction of minerals to take place only excavation. | SCC (Planning) confirms that the use of excavated minerals within the development would be supported. |
| 10e | Waste Hierarchy | Table 7.1 Waste hierarchy to be followed. | SCC (Planning) supports use of the Waste Hierarchy. |
| 10f | Decommissioning | Table 7.1 Cables could either be left in the ground or removed. | SCC (Planning) wishes to see the cables removed if practicable. |
| 10g | Safeguarding | Table 7.1 Applicant concurs with SCC's in respect of their being no detrimental impacts. | SCC (Planning) notes this. |

Chapter 11 – Agriculture and Soils (Lead Authority Natural England)

| Table 11: Chapter 11 – Agriculture and Soils | | | |
|---|---|--|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 11a | Loss of BMV land during construction | Table 8.1 states that drainage would be maintained during construction and that the loss of BMV would only be temporary. | SCC (Planning) noted. |
| 11b | Loss of BMV land during operation | Table 8.1 states that drainage would be reinstated and that the loss of BMV would not be significant. | SCC (Planning) noted. |
| 11c | Loss of BMV land during decommissioning | Table 8.1 states that the applicant does not agree that there would be a loss of BMV during decommissioning. | SCC (Planning) maintains that there would most likely be a small temporary loss of BMV land available during decommissioning. |
| 11d | Drainage | Table 8.1 refers to the reinstatement of drainage. | SCC (Planning) noted. |
| 11e | BMV land | Table 8.1 refers to the limited impacts upon BMV land so long as appropriate soil handling techniques are employed. | SCC (Planning) noted. |

Chapter 12 – Traffic and Transport including Public Rights of Way (Local Highways Authority SCC)

| Table 12: Chapter 12 – Traffic and Transport including Public Rights of Way | | | |
|--|--------------|--|---|
| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 12a | | | <p>All movements are single one way movements either to the site or returning from the site.</p> <p>Peak workers 350, average 180 TA 6.2.5</p> <p>Minibus occupancy min average of 4 per and carrying 70% of staff trip TA 6.2.9</p> <p>25% staff arrive 0600-0700, 50% 0700-0730 and 25% 0730-0830.</p> <p>25% staff depart 1730-1830, 50% 1830-1900 and 25% 1900-2000 TA 6.2.9.</p> <p>Or</p> <p>Max 32 car / LGV trips in peak hours (0800-0900, 1700-1800). Max 317 daily movements</p> <p>Max 35 one way HGV in peak hours (0800-0900, 1700-1800) TA 8.1.3 and max daily number of HGVs 387 TA table 6.1. SCC would prefer this refined to maximum peak and daily trips on each route.</p> <p>Traffic Routing as CTMP appendix A.</p> <p>Compliance with Air Quality requirements (i.e., EuroVI for HGVs) to be recorded and reported</p> <p>HGVs restricted to working hours 0700-1900 Mon - Fri and 0700-1300 Sat with exceptions (as TA 2.3.2)</p> <p>Monitoring to agree with LPA / LHA and reports summarising this data and any exceptions provided every 3 months</p> |
| 12b | | Table Reference (LIR Paragraph) 12.13 in the Applicant's Comments on Suffolk County Council and Babergh and Mid Suffolk District | SCC (PROW) are unable to carry out full assessment of impact of severance without sequencing details. Cumulative effect of closures within a geographical area having a greater impact than |

| Table 12: Chapter 12 – Traffic and Transport including Public Rights of Way | | | |
|--|--------------|--|--|
| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| | | <p>Councils’ Local Impact Report [REP3-049] notes: “The Councils have concerns over the timings of closures of the PRow and the effect on the wider network. These cannot be assessed in isolation and require details on the sequence of closures for the impact on the routes within the DCO and the connecting network.”</p> <p>Applicant’s Comments on the LIR, response to LIR Paragraph 12.13, “Requirement 3 of the dDCO (document 3.1 (C)) includes the requirement for a Stage Plan to be submitted to the relevant local authorities prior to commencement. This will set out the sequencing of construction.”</p> | <p>individual isolated restrictions.</p> |

Chapter 13 – Air Quality (Environmental Health Authorities BMSDC)

| Table 13: Chapter 13 – Air Quality | | | |
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| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 13a | Sudbury AQMA | Table 10.1 Construction traffic will not be routed through Sudbury. Scheme for decommissioning will be submitted to the Relevant Planning Authority under Requirement 12. | SCC (Planning) noted. |
| 13b | Fugitive dust emissions | Table 10.1 Good practice measures will avoid problems. Scheme for decommissioning will be submitted to the Relevant Planning Authority under Requirement 12. | SCC (Planning) noted. |
| 13c | Operational issues | Table 10.1 No comments. | SCC (Planning) noted. |
| 13d | CTMP required | Table 10.1 An updated CTMP has been submitted at Deadline 3. | SCC (Planning) noted. However, SCC is of the opinion that it lacks details and should be treated as an outline document which following consent would be replaced by a detailed version provided by the main contractor and approved under a requirement. |

Chapter 14 – Noise and Vibration (Environmental Health Authorities BMSDC)

| Table 14: Chapter 14 – Noise and Vibration | | | |
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| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| 14a | Construction phase impacts | Table 11.1 ES Chapter sets out issues and proposed mitigation. | SCC (Planning) noted. |
| 14b | Operational phase impacts | Table 11.1 No comments | SCC (Planning) noted. |
| 14c | Decommissioning Phase Impacts | Table 11.1 Unlikely to be decommissioning phase impacts. | SCC (Planning) argues that there is the potential to create disturbance. |
| 14d | Noise mitigation | Table 11.1 mitigation for construction contained with the CEMP and for decommissioning a written scheme of decommissioning would need approval from the Relevant Planning Authority. | SCC (Planning) noted. |
| 14e | Working Hours | <p>Table 11.1 The Council objects to proposals set out in the dDCO Requirement 7 to allow any construction on Saturday afternoons, Sundays and Bank Holidays and outside of core construction times.</p> <p>It is, however, generally anticipated that only alternate weekends would be worked in any specific geographical location (noting that the overhead line works and underground cable works would be in different locations (and with different contractors), save where they meet / overlap, as noted above), due to standard work shift patterns which would</p> | <p>SCC (Planning) noted. However, SCC is of the opinion that the working hours should be restricted and/or phased under the DCO Requirements to ensure the avoidance unnecessary impacts upon residential and rural amenity including from noise.</p> <p>Although, if the working hours proposed by the Applicant are deemed essential to deliver the project in a timely fashion and to ensure that work can be completed to accommodate the required network outage windows, it is essential that there are:</p> <ul style="list-style-type: none"> • Effective and robust schemes of engagement with local communities during construction, and • Effective construction management plans that are secured through DCO requirements, and |

| Table 14: Chapter 14 – Noise and Vibration | | | |
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| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| | | <p>reduce disruption from construction activities. The expectation therefore is that such alternate weekend working by one contractor (for example for overhead line works), would generally be in different geographical areas (for example when compared to the underground cable works). Hence there might be work undertaken each weekend, but in different locations and hence with different receptors.</p> | <ul style="list-style-type: none"> • Effective embedded mitigation measures <i>and</i> contingency funds to secure additional mitigation if required; to mitigate any unforeseen impacts on both public and private amenity during construction. <p>Given the uncertainties around construction impacts and its potential interaction with private amenity and business functions, contingency measures and funding to support them should be provided so that the Applicant and their principal contractor can respond to amenity issues generated by construction as they arise. Such an approach would be consistent with that of other energy project promoters in Suffolk.</p> |

Chapter 15 – Economic Development, Skills and Tourism (Joint Responsibility BMSDC & SCC)

| Table 15: Chapter 15 – Economic Development, Skills and Tourism | | | |
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| Ref | Topic | Summary of Applicant's Comments | SCC's Response |
| 15a | <p>Employment skills and education Ref 15.3 to 15.4</p> <p>Local employment opportunities Ref 15.5</p> | <p>The Applicant is committed to working with the Councils and other stakeholders regarding aspirations in respect to community benefits including employment, skills and education outside of the DCO process.</p> <p>In the Applicants experience it is likely that a minimum of 10% of the workforce would be sourced from the local labour market.</p> | <p>Although SCC (Skills) welcome the Applicants commitment to continue discussions on maximising benefits, the Council does not consider the applicant has provided a thorough or evidence-based examination of the possibility of local labour and requests that the applicant does further work to define the skills needed within its workforce and compares this to the skills available within the local labour market providing an evidence based approach to assessing likelihood of local labour.</p> <p>The Applicant has stated that 65% of the project cost would be spent on civil engineering works (e.g., excavations, foundations, construction and reinstatement) (Document 5.9 Socio Economics and Tourism Report [APP-066] paragraph 4.3.8), therefore, SCC (Skills) disputes the statement from the Applicant that the majority of employment activities would require trained specialists who are qualified to work on high voltage electricity lines.</p> <p>Therefore, SCC (Skills) reiterates that it cannot fully determine the sufficiency of the approach to determining socio economic effects ahead of receiving a detailed workforce profile.</p> |
| 15b | <p>Employment, Skills and Education Strategy Ref 15.6</p> | <p>The Applicant has not committed to preparing and implementing an Employment, Skills and Education Strategy, as it does not consider this is needed on this project given the low number of jobs that would be created and that many will</p> | <p>SCC (Skills) will expect the Applicant to prepare and implement an Employment, Skills and Education strategy once a detailed workforce assessment has taken place and the socio economic impacts of this have been considered in full.</p> |

| Table 15: Chapter 15 – Economic Development, Skills and Tourism | | | |
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| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| | | require trained specialists who are qualified to work on high voltage electricity lines sourced from the Applicant’s existing pool of approved contractors. | |

Chapter 16 – Public Health (Public Health Authorities SCC)

| Table 16: Chapter 16 - Public Health | | | |
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| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| 16a | EMF | The Applicant has no comments. | SCC (Planning) noted. |

Chapter 17 – Draft Development Consent Order (Lead Authority for comments SCC)

| Table 17: Chapter 17 – Draft Development Consent Order | | | |
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| Ref | Topic | Summary of Applicant’s Comments | SCC’s Response |
| 17a | Management Plans | The Applicant has, on a number of occasions, asked the Councils to provide tangible examples of details which they consider to be missing from the current Management Plans. Once this information is provided, the Applicant will identify whether further changes are required to the Management Plans | <p>SCC (LHA) notes that there were further details provided, in addition to paragraph 17.57 of the Suffolk Joint LIR [REP1-045], in paragraphs D.114 to D.132 and D.158 to D163 in Annex D of the LIR [REP1-044].</p> <p>SCC (Landscape) will provide a full review (tracked-change version) of the D3 LEMP [REP3-034] for Deadline 5. Annex A of this document provides an outline of concerns with the control documents in relation to landscape and visual impacts.</p> |

Annex A – Control Document Review in relation to landscape and visual impacts

This is based on a review of the original submission documents, but has been updated against REP3 documents, which are referenced as applicable.

| Document Synopsis | SCC (Landscape) comments |
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| CEMP [REP3-025] | |
| <p>6.2.1 Construction phase management measures in relation to landscape and visual are contained in the following documents:</p> <p>a) Embedded measures in CEMP Appendix B: REAC (application document 7.5.2);</p> <p>b) General good practice measures including GG06 to GG08 and topic-specific good practice measures LV01 to LV03 in the CoCP (application document 7.5.1); and</p> <p>c) ES additional mitigation measures EIA_LV01 and LV02 in ES Chapter 6: Landscape and Visual (application document 6.2.6) and in the REAC (application document 7.5.2).</p> | <p>SCC considers the fragmentation of information regarding landscape and visual construction phase measures unhelpful, if not unworkable.</p> <p>This information should be brought together into a one-stop-shop document.</p> |
| <p>6.3.1 All construction phase measures in relation to vegetation retention, loss and reinstatement are set out in the LEMP (application document 7.8).</p> | <p>See comment above.</p> |
| <p>Lighting is dealt with in CEMP in a sub-section that sets out the construction phase measures in relation to construction lighting ([APP-177], Section 6.4 p.26f).</p> | <p>See comment above.</p> <p>CEMP [REP3-025], paragraph 6.4.4 remains vague ('it is anticipated'; 'the lighting towers typically operate', lumen output between 10-40k).</p> <p>SCC requests detailed finalised Lighting Proposals, type of luminaire used, i.e., directional, hooded, lux levels.</p> <p>Around CSE compounds lux plans and lighting design strategies for permanent lighting are required.</p> |

| Document Synopsis | SCC (Landscape) comments |
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| Lighting is also address in GG10 and GG20 | Fragmentation. |
| GG10 Any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration and lighting, will be located away from sensitive receptors such as residential properties or designated ecological sites where practicable. | What will happen, where this is not practicable? |
| GG20 Construction lighting will be of the lowest luminosity necessary to safely perform each task. It will be designed, positioned and directed to reduce the intrusion into adjacent properties, protected species and sensitive habitats. | Where is the table that sets out which lighting levels are required for which task? |
| REAC [REP3-029] – Embedded measures in relation to visual and landscape | |
| Overall. | It is not clearly identified which topic area the listed embedded measures relate to. It would be helpful to have an additional column that lists topic areas the measures relate to (as provided for the additional measures). |
| Overall. | The REAC provides headlines/ summaries of embedded measures, but little detail, how these will be realised. And SCC (Landscape) have not seen more detail being provided elsewhere. |
| Additional Mitigation measures for landscape and visual comprise: a)EIA_LV01 Proposed woodland and scrub planting at Bramford Substation (MM01) will benefit properties on Church Lane by filtering views of the substation. (to be secured through the LEMP); and b)EIA_LV02 Proposed hedgerow planting (MM06) will benefit properties along the A1071 by filtering views of the | The additional mitigation is not considered sufficient to address the residual landscape and visual effects identified in the ES. |

| Document Synopsis | SCC (Landscape) comments |
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| <p>new 400kV overhead line. (to be secured through the LEMP).</p> | |
| <p>CoCP [REP3-027]</p> | |
| <p><i>Good Practice Measures</i></p> | |
| <p>GG06 A full record of condition will be carried out (photographic and descriptive) of the working areas affected by the construction activities. This record will be available for comparison following reinstatement after the works have been completed to ensure that the standard of reinstatement at least meets that recorded in the pre-condition survey or as agreed in the LEMP (document 7.8) or if the DCO provides otherwise, then in accordance with the DCO.</p> | <p>SCC welcomes the full record of condition that is proposed. SCC agrees that the record of condition should inform the detailed proposals for reinstatement as stated in the LEMP, [REP3-035], paragraph 7.1.1. However, the last sentence of GG06 (in the box on the left) does not make this clear. It also seems ambiguous.</p> |
| <p>GG07 Land used temporarily will be reinstated where practicable (bearing in mind any restrictions on planting and land use) to its pre-construction condition and use. Hedgerows, fences and walls (including associated earthworks and boundary features) will be reinstated to a similar style and quality to those that were removed, in consultation with the landowner.</p> | <p>The language remains vague. The last sentence does not ensure secure mitigation or reinstatement.</p> |
| <p>GG08 Where sensitive features are to be retained within or immediately adjacent to the Order Limits, an appropriate protective area will be established specific to the feature being protected. The sensitive feature will be demarcated and signed. The demarcation and signage and will be inspected, repaired and replaced as necessary, for example if damaged. Sensitive features will be shown on the Vegetation Removal and Retention Plan (document 7.8.1)</p> | <p>SCC would welcome a description of types of sensitive features that are envisaged, and how they would be treated.</p> |

| Document Synopsis | SCC (Landscape) comments |
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| and the Vegetation Reinstatement Plan (document 7.8.2) contained within the LEMP. | |
| GG14 to GG16 | GG14 to GG16 should also relate to trees (fuels, oils, chemicals, run-off, wash-down etc). |
| <i>Topic Specific Landscape and Visual (including Trees)</i> | |
| LV01 The contractor(s) will retain vegetation where practicable and in accordance with LEMP Appendix A - Vegetation Retention and Removal Plan (document 7.8.1). Where vegetation is lost and hedgerows and trees cannot be replaced in situ due to the restrictions associated with operational requirements of planting near the line and/ or safety requirements, replacement vegetation will be planted as close by as practicable and will complement landscape character and be sympathetic to the local habitat type in order to provide a high biodiversity value. | Clarification of vague descriptions and further details are required. |
| LV02 The contractor(s) will apply the relevant protective principles set out in British Standard 5837:2012: Trees in relation to design, demolition and construction. This will be applied to those trees within the Order Limits which will be preserved through the construction phase, and to trees outside of the Order Limits where such measures do not hinder or prevent the use of the relevant working width for construction. All works to high grade trees, including trees under Tree Preservation Orders and veteran trees, will be undertaken or supervised by a suitably qualified arboriculturist. | Clarification of vague descriptions and further details are required. SCC notes that LV02 factors in the possibility for trees outside the order limits to be affected by the works, yet no mitigative planting outside the order limits is proposed or considered. |

| Document Synopsis | SCC (Landscape) comments |
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| LV03 A five-year aftercare period will be established for all reinstatement and mitigation planting. | SCC considers that 5 years of aftercare is not sufficient for all planting. |
| LEMP [REP3-035] | |
| General | <p>SCC considers that there are issues with the LEMP, as it is currently presented, which are not acceptable for a final LEMP, in some cases, not even for an Outline LEMP.</p> <p>In addition to the following points, SCC shall provide a tracked-change version of the D3 LEMP [REP3-034] for Deadline 5, therefore these comments are unlikely to be comprehensive at this stage.</p> |
| General | See points previously made in the LIR [REP1-045] , paragraphs 6.148-6.171. |
| Paragraph 1.3.1 | The purpose of the LEMP should go beyond the construction period and include aftercare and long-term management prescriptions (which are, in fact, included in the document). |
| Table 3.1 | The technical specialists should also include a landscape architect. It should be more clearly defined for which types of works they will be called upon, rather than leaving this to the discretion other personnel. |
| EM-D01 requires that planting will be maintained for lifetime of CSE compound | This is now stated in the LEMP [REP3-035] , paragraph 9.1.2, which is welcome. |
| The Vegetation Reinstatement Plan [REP3-036] indicates the location of the proposed embedded planting at the GSP. | There are, however, no indications of how the planting will be arranged or what it will comprise. This means, there is no reassurance as to how effective the planting will be in terms of visual mitigation. In general, the Vegetation Reinstatement Plan is presented at a scale that is not accurate enough for the implementation stage. While various plantings are labelled, not much assistance is provided to remind the user of the drawings, what these labels stand for and where exactly further prescriptions might be found, for ease of use. |

| Document Synopsis | SCC (Landscape) comments |
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| Paragraph 6.3.7 | Tree Protection approach for veteran trees states that the project 'has considered' the Standing Advice by Natural England and the Forestry Commission. The Applicant needs to confirm that it will adhere to this advice or demonstrate why this is not possibly on a case by case basis. |
| Paragraph 6.4.2 | SCC considers that the protection of hedgerows too vague. |
| Section 6. Vegetation Retention | SCC considers that the Vegetation Retention is inadequate (paragraphs 6.2.5-6.2.10). Where protection is required, i.e., if there is any risk that the retained vegetation may be damaged during construction, appropriate protection, i.e., Heras style fencing, shall be installed. There should be a clear approach to situations, when vehicle access with RPAs (paragraphs 6.2.10 and 6.2.13) may be deemed necessary and therefore acceptable and any works within the RPA, including protective measures must be supervised by a suitably qualified Arboriculturist. |
| Planting Schedules [APP-185] | |
| The plant schedules are divided into vegetation types. | However, there is no indication that the species listed for each type represent a palette that will be fine-tuned to reflect the potentially varying conditions of the different landscape character areas (based on landscape character types) within the project area. |
| Species selection | The species mixes contain species that are not usual for the wider project area, such as <i>Tilia cordata</i> in Hedgerow Mix H2. <i>Sambucus nigra</i> does not need to be included in the mixes (for example in H1 Species rich Hedgerow mix), as it is likely to self-seed. |
| Species mixes | The percentages of certain species within some species mixes seem inappropriate, such as 20% of <i>Prunus spinosa</i> (suggest 5%). |
| Proposed sizes for trees | The sizes for proposed trees within the W1 Woodland Mix, W2 Woodland Edge, T1 Individual Tree Planting and H2 Species Rich Hedgerow Planting With Trees are inappropriate for the planting conditions of the project area. |

| Document Synopsis | SCC (Landscape) comments |
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| | <p>SCC (Landscape) cannot support these sizes, as root-balled trees of a height of 300-350cm are costly, inherently difficult to establish, and would require heightened levels of aftercare, in particular regular (twice weekly) watering, to give them a chance of survival. SCC (Landscape) recommends planting sizes no bigger than feathered whips, if/where a differentiation to smaller hedge planting is desired. Usually, smaller trees have a greater rate of success, with better growth rates than trees planted in larger sizes. Within a few years the smaller trees are likely to provide the same or better mitigation as/than trees larger at planting. Additionally, failure rates tend to be lower, and failures are less costly to replace (money that can be spend on aftercare).</p> |

| Suggestion for a LEMP prototype | |
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| <p>Post consent/Prior to construction</p> | <p>Prior to construction a detailed Landscape and Ecological Management Plan would be produced for each stage of the works including details of all proposed hard and soft landscaping works, such as:</p> <ul style="list-style-type: none"> a. Finalised location, number, species, sizes and density of any proposed planting, including any trees b. cultivation, importing of materials, protection, and weed control to ensure plant establishment c. proposed finished ground levels d. hard surfacing materials e. vehicular and pedestrian access, parking and circulation areas f. minor structures, such as furniture, refuse or other storage units, signs and lighting g. proposed and existing functional services above and below, ground, including drainage, power and communications cables and pipelines, manholes and supports h. details of existing trees and hedges to be retained with measures for their protection during the construction period i. retained historic landscape features such as ditches and banks and proposals for restoration, where relevant j. implementation timetables for all landscaping works k. soil retention, handling and protection (including replacing woodland soils within the woodlands on completion) l. The provision of a scheme of sustainable drainage will be integrated into the scheme m. the details of hard and soft landscaping works at the CSE compounds n. Integration of CSE compound design principles. o. A mitigation strategy, if required, for the loss of any veteran trees or trees with veteran characteristics and how it would be implemented. p. Where trees cannot be planted over the cables, habitat continuity would be maintained through planting of shrub species. |

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| | <p>q. To aid establishment of replanted trees and shrubs, a scheme of protection would be developed to demonstrate how new tree and hedge planting would be protected against deer, rabbits/hares etc. (for example with stock-proof fencing and either rabbit-proof fencing or tree guards). The detail would also indicate a variety of access gates within the detail for badgers or other creatures that may have, for instance, established routes through the restored hedge.</p> <p>r. To ensure development to a satisfactory standard, there will be an agreed procedure for joint annual inspection of all planting areas by representatives of the relevant Local Planning Authority and developers towards the end of each growing season and for each year of the aftercare period, following implementation. Areas found not to be thriving should be treated to such additional works as are required to rectify the situation within the next growing season.</p> <p>s. Any tree or shrub planted as part of an approved landscaping management scheme that, within the agreed aftercare period, is removed, dies or becomes, in the opinion of the relevant Local Planning Authority, seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise agreed in writing by the relevant Local Planning Authority.</p> <p>t. Suspension of the aftercare period for any part of the scheme may occur in the event that in the opinion of the relevant Local Planning Authority there was a significant failure of the planting scheme that could not be satisfactorily remedied in the following planting season, and or part of the planting scheme was failing to progress to the extent that it would not achieve the objectives of the scheme within the specified aftercare period.</p> |
| <p><i>Hedgerows</i></p> | |
| <p>Hedgerow prescriptions to be included in the LEMP.</p> | <p>For hedgerows, where there are no protected species issues (e.g., they are not used as important commuting/foraging routes by bats, etc), the hedgerow does not qualify as an important hedgerow under the Hedgerow Regulations 1997, and removal of the hedgerow is not anticipated to have significant residual visual impacts, the following measures would be followed:</p> <ul style="list-style-type: none"> a. The topsoil (including any bank) from beneath the hedgerow would be stripped and stored separately. b. Vegetation and topsoil from any associated ditch would be stripped and stored separately. |

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| | <p>c. Soil storage areas would be clearly signed and demarcated to prevent any mixing with other soils</p> |
| <p>Measures for Important Hedgerows under the Hedgerow Regulation 1997 to be included in the LEMP</p> | <p>The mitigation measures for botanically important hedgerows, or those qualifying as important under the Hedgerow Regulations 1997 would be the same as above with the exception that, where viable, the following measures would be considered, discussed, and agreed with the relevant Local Authority:</p> <ul style="list-style-type: none"> a. The minimisation of the construction width, by coppicing the hedge plants and protection of the coppice stools, with a temporary roadway, wherever practicable and appropriate b. The coppicing and removal to hedge plants, (shrubs) along the Cable Route to a location where they can be maintained and subsequently replaced into the boundary Vegetation would first be trimmed to ground level. c. Where possible, geotextile would be used for the running track to reduce the amount of topsoil being stripped (this would aid reinstatement of vegetation). <p>Post construction</p> <ul style="list-style-type: none"> d. Banks and ditches would be reformed to similar profiles as before. e. Topsoil would be replaced after works in the reverse order that it was excavated to distinguish its difference from other stored topsoil f. Replanting of hedgerows would take place in the first available planting season following construction and would aim to enhance baseline conditions i.e., through improved species diversity or replanting on a two for one basis (two planted for each plant removed), where compliant with landscape objectives. g. Planting would use shrubs of the same species and in the same general proportions as existed pre-construction (native, preferably of local origin). The replanting mix and pattern would be established on the basis of a survey in accordance with the Hedgerow Regulations, 1997 h. A schedule of species composition for reinstatement would be provided i. A detailed scheme of hedge planting aftercare will be provided, to be agreed with the relevant local authorities. This will include details of soil restoration and ground preparation, species choice, stock size, spacing and a program of weed control and aftercare to cover a period of five years. |