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Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

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Contents

1.	Introduction	1
1.1	Overview	1
1.2	Structure of this Document	1
2.	Construction Environmental Management Plan	3
2.1	Introduction	3
3.	Construction Traffic Management Plan	7
3.1	Introduction	7
4.	Landscape and Ecological Management Plan	12
4.1	Introduction	12
5.	Outline Written Scheme of Investigation	39
5.1	Introduction	39

Table 1.1 – Structure of this Report Document	11
Table 2.1 – Comments on the CEMP (including the CoCP and REAC)	33
Table 3.1 – Comments on the CTMP	7
Table 4.1 – Comments on the LEMP	1212
Table 5.1 – Comments on the OWSI	39

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 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 includes five management plans, ~~which that~~ would be secured through Requirement 4 of the draft Development Consent Order (DCO) ~~(Document 3.1 (F))~~; ~~[REP6-003]~~; and the Archaeological Framework Strategy [APP-186] and the Outline Written Scheme of Investigation (OWSI) [REP5-016], which are secured by Requirement 6 of the draft DCO.
- 1.1.2 This document comments on submissions received from Interested Parties regarding proposed changes to the management plans. This document includes in Chapter 4, comments on the tracked change version of the Landscape and Ecological Management Plan (LEMP) [REP5-035] which was submitted on behalf of Suffolk County Council (SCC), Essex County Council (ECC), Babergh and Mid Suffolk District Council (BMSDC) and Braintree District Council (BDC) at Deadline 5.
- 1.1.3 SCC also noted in their Response to Action Points from Issue Specific Hearing 2 (paragraph 1.2) ~~and~~ in the Response to Action Points from CAH1, ISH2, ISH3 and ISH4 [REP5-034] that the suggested changes to the LEMP ~~that are~~ required in order to make it function as an outline LEMP also apply to the Construction Traffic Management Plan (CTMP), the Construction Environmental Management Plan (CEMP), the ~~LEMP and its appendices, the~~ Public Rights of Way Management Plan (PRoWMP) and the Outline Written Scheme of Investigation (OWSI). The Applicant is unable to comment on this further, as other than a request that the other management plans are made outline instead of final, it is unclear which references in the LEMP would apply to these other management plans. The Applicant also notes that the OWSI [REP5-016] is an outline plan with the details to be provided later in the form of a Detailed Written Scheme of Investigation, in accordance with Requirement 6 of the draft DCO ~~(Document 3.1 (F))~~; ~~[REP6-003]~~.
- 1.1.4 This document covers submissions that have been received from other Interested Parties on the CEMP ~~(Document 7.5 (C))~~; ~~[REP6-021]~~ and its Appendix B: Register of Environmental Actions and Commitment (REAC) ~~(Document 7.5.2 (D))~~; ~~[REP6-023]~~, the CTMP ~~(Document 7.6 (C))~~; ~~[REP6-025]~~ and the LEMP ~~[REP3-034]~~; ~~(Document 7.8 (C))~~ and has been updated at Deadline 7 to also include a response to comments received on the OWSI (Document 7.10 (C)). In terms of the remaining management plan documents:
- CEMP Appendix A: Code of Construction Practice (CoCP) [REP3-026] - No specific comments have been received on this, and therefore it is not included within this document;
 - Materials and Waste Management Plan [REP3-032] - No specific comments have been received on this, and therefore it is not included within this document;
 - PRoWMP [REP3-056] – the only comment raised by Interested Parties was to provide further clarification regarding the assumed closure sequencing. This has been provided on an indicative basis in the Technical Note on Public Rights of Way Closure Sequencing (Document 8.5.9) at Deadline 6 and therefore is not further addressed within this document; and
 - ~~Archaeological Framework Strategy [APP-186] - No specific comments have been received on this, and therefore it is not included within this document; and~~
 - ~~OWSI [REP5-016] – Comments were received on behalf of Essex and Suffolk County Council on the 18 December 2023. The Applicant will review these comments and respond further at Deadline 7. Therefore, the OWSI is not included within this document.~~
- 1.1.5 The Applicant has also received a number of documents from the Local Planning Authorities in response to the discussions on the draft Statement of Common Ground Local Authorities (Document 7.3.1 (C)), some of which may apply to the Management Plans. The Applicant is reviewing these comments and will respond further at Deadline ~~7~~8 regarding any further changes that may be required.

1.2 Structure of this ~~Report~~Document

Table 1.1 sets out the structure of this ~~report~~,document which addresses each management plan in a separate chapter.

Table 1.1 – Structure of this ~~Report~~Document

Chapter	Content
1: Introduction	This sets out the purpose of the document and presents the structure of the report document.
2: Construction Environmental Management Plan	This sets out the Applicant's review of proposed changes to the CEMP (Document 7.5 (C)) and the REAC (Document 7.5.2 (D)) .
3: Construction Traffic Management Plan	This sets out the Applicant's review of proposed changes to the CTMP (Document 7.6 (C)) .

Chapter	Content
4. Landscape and Ecological Management Plan	This sets out the Applicant's review of proposed changes to the LEMP and its appendices, which will be updated (Document 7.8 (C), Document 7.8.1 (B), Document 7.8.2 (C)) and submitted at Deadline Document 7.8.3 (B) .
5. Outline Written Scheme of Investigation	This sets out the Applicant's review of proposed changes to the OWSI (Document 7.10 (C)).

2. Construction Environmental Management Plan

2.1 Introduction

2.1.1 Table 2.1 sets out the Applicant's ~~review~~ comments of submissions received from Interested Parties on the CEMP (~~Document 7.5 (C)~~)[REP6-021]. The Applicant commented on the SCC Responses to Comments on Local Impact Report [REP4-008] at Deadline 5 in relation to the CEMP so these are not duplicated in Table 2.1. Table 2.1 does not cover comments received from third parties on the working hours, as the Applicant has been commenting separately on these, including in the Technical Note for Noise Sensitive Receptors (**Document 8.8.7**) submitted at Deadline 6.

Table 2.1 – Comments on the CEMP (including the CoCP and REAC)

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
SCC Comments on any other submissions received at Deadline 4 [REP5-033]			
Table 3 (3a)	REAC	SCC welcomes the changes in layout to the REAC. The added columns for Location, Project Phase, Delivery Mechanism and DCO Requirement or Schedule are useful.	The Applicant notes this response and has no comment to make.
Table 3 (3b)	REAC	The references with regards to the delivery mechanisms could be more detailed, ideally down to paragraph numbers, where further detail can be found; for documents that have several Appendices, any relevant Appendix should be listed.	The Applicant considers the delivery mechanism column is presented in the same manner as the Yorkshire GREEN example requested by the ExA. The Applicant does not consider it necessary to provide paragraph numbers, where particularly given that these could change reference during the course of examination. The purpose of this column is to demonstrate that commitments are secured.
BMSDC Comments on Other Submissions Received at Deadline 4 [REP5-030]			
N/A	Section 61 consent	It is our understanding that scheduled overruns/out of hours working will be subject to Control of Pollution Act (CoPA) 1974 S61 prior consent with the submission of an application detailing times of work, plant details and noise/vibration levels. BMSDC shall require these submissions without exception at least 28 days prior to commencement. This would be essential in the case of horizontal directional drilling which is identified as being likely to require night-time working to complete trenchless crossings	Section 14.4 of the CEMP (Document 7.5 (C))[REP6-021] outlines the need for Section 61 consents. This states in paragraph 14.4.1 that the contractor will be required to submit applications for Section 61 consents, variations and dispensations under CoPA 1974 for construction activities that are: likely to result in a significant effect at a sensitive receptor (see Environmental Statement (ES) Chapter 14: Noise and Vibration [APP-082] for details); or likely to be undertaken outside of the Core Working Hours (within the parameters of DCO Requirement 7 of the draft DCO (Document 3.1 (F))[REP6-003]).
Natural England's Comments on Information Provided at Deadlines 3 and 4 on Soils and Best and Most Versatile Agricultural Land [REP5-037]			
2.1, 2.17 / 3.1, 3.2	Soil Management Plan	The inclusion of the soil management measures as a soil management plan in the CEMP is acceptable, as per our advice provided in our Written Representation. However, the CEMP is not informed by site specific soil information, where such data is available.	The Applicant does not consider that the CEMP (or a Soil Management Plan) needs to contain the details from the soil surveys. The Main Works Contractor would draw on the original soil survey results to inform the site-specific soil storage and reinstatement measures.
2.2	Soil types	It is acknowledged that soil surveys have not been completed for all land inside the Order Limits, and that soil surveys will be undertaken in 'areas of underground cable where soil stripping is proposed'. However, identified soil types at the cable sealing end (CSE) compound and substation locations should provide an indication of soil resilience. This includes expected excavated topsoil and subsoil volumes and thus the required storage space, including any need to separate soils of differing type, which should be considered in the soil management measures.	<p>The Applicant has undertaken soil surveys for all areas within the Order Limits where there would be a permanent impact on soils (at the CSE compounds and the grid supply point (GSP) substation and also at locations where the temporary works would disturb large areas of soil i.e. the underground cable swathe and the temporary access route off the A131-).</p> <p>The Applicant does not consider that the CEMP (or a Soil Management Plan) needs to contain the details from the soil surveys. The Main Works Contractor would draw on the original soil survey results to inform the site-specific soil measures and would identify soil storage areas as part of the detailed designs.</p> <p>The estimated volumes of soil storage have been considered as part of the development of the Order Limits, as shown on the Design and Layout Plans Cable Working Cross Section [APP-027]. This shows that soil storage would typically be along the working length for the cable sections. However, there are exceptions to this where there are existing site constraints, for example an additional storage area is shown on Sheet 14 of Figure 4.1 [PDA-002] which allows for soil storage from where the Order Limits have been narrowed to avoid impacts on woodland at Alder Carr.</p>
2.3	Good Practice Guide for Handling Soils	Natural England notes that Good Practice Guide for Handling Soils (Ministry of Agriculture, Fisheries and Food, 2000) has now been superseded by guidance from the Institute of Quarrying (2021).	Noted. The Applicant has included the updated reference in the CEMP at Deadline 6 (Document 7.5 (C))[REP6-021]. The Applicant does not consider that this updated guidance affects the conclusions

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
			of the ES or change changes the measures set out in Chapter 11 of the CEMP (Document 7.5 (C))[REP6-021].
2.4	Soils during extreme weather conditions	It is expected that soil handling would be confined to the drier summer period to minimise risk of soil damage (April through September). This would minimise the need to recondition soils, which requires additional space and time. This is particularly important for land to be restored to agricultural use.	<p>The Applicant is not able to restrict all soil handling to April to September as this would have significant implications on the deliverability of this Nationally Significant Infrastructure Project (NSIP) and also when it has, particularly given that the Applicant has also made commitments to avoid works in bird nesting season around Hintlesham Woods SSSI. The Applicant considers that there are suitable measures contained within the CEMP (Document 7.5 (C))[REP6-021] to protect soils during construction, including those soils to be restored to agricultural use.</p> <p>The Applicant also notes that <u>National Grid and</u> its contractors regularly undertake construction of high voltage electricity lines and is used to managing and handling soil on its projects in discussion with landowners, many of which are agricultural holdings. Paragraph 11.3.34 of the CEMP (Document 7.5 (C))[REP6-021] states that 'Land used temporarily will be reinstated to an appropriate condition relevant to its preconstruction condition and, where relevant, Agricultural Land Classification grade, including any subsoil drainage, unless otherwise stated within the LEMP.' 'Where relevant' refers to areas where the original land use would not be reinstated, for example in areas where new planting is proposed rather than reinstatement of the original arable use.</p>
2.6, 2.16	Working in relation to frozen ground	Paragraph 11.3.4 of the CEMP states, 'In the case of frozen ground, excavation works may proceed given effective excavation techniques and implementation of safety measures to prevent excavation collapse during thawing, however backfilling of frozen soils will not be possible as required compaction levels will be unachievable. Subsequently the soils will be allowed to fully thaw before commencing backfilling activities.' It is Natural England's advice that soil should not be handled or trafficked over/driven on when the ground is frozen or covered by snow.	The Applicant considers that the wording in paragraph 11.3.4 of the CEMP (Document 7.5 (C))[REP6-021] confirms the method that would be undertaken but also notes that there need needs to be measures in place to allow for excavation works to proceed during prolonged periods of cold weather where tasks become critical to the programme, for example where needed to meet an agreed outage window.
2.7	Soil scientist role	As detailed in paragraph 11.3.7 of the CEMP, Natural England welcomes the requirement for a Soil Scientist with specified competencies to advise on, and supervise, soil handling activities.	Noted –The Applicant has no comment on this matter.
2.8	Machinery	Paragraphs 11.3.12 - 11.3.13 of the CEMP detail that the topsoil stripping methodology is stated to follow the Defra 2009 Construction Code, however the subsequent paragraph states stripping will include excavators and bulldozers. The Defra 2009 Construction Code states that stripping should be undertaken by an excavator. Any alternative stripping methods proposed need to demonstrate that they can afford the same degree of soil protection as the excavator method.	The Applicant notes that the Institute of Quarrying (2021) includes guidance for both excavators and bulldozers. <u>Although the code gives the preferred method as stripping by excavator, it states that alternative stripping methods are acceptable where these afford the same degree of soil protection.</u> The Applicant regularly uses bulldozers on the construction and maintenance of long linear high voltage electricity lines and that this does not lead to detrimental effects on soil when handled appropriately.
2.9	Soil stockpile locations	Paragraph 11.3.16 of the CEMP states, 'where the working area allows'. Natural England advise that the soil volume to be excavated should already have been determined and inform the required working area for soil stripping and storage.	The estimated volumes of soil storage have been considered as part of the development of the Order Limits, as shown on the Design and Layout Plans Cable Working Cross Section [APP-027]. This shows that soil storage would typically be along the working length for the cable sections. However, there are exceptions to this where there are existing site constraints, for example an additional storage area is shown on Sheet 14 of Figure 4.1 [PDA-002] which allows for soil storage from where the Order Limits have been narrowed to avoid impacts on woodland at Alder Carr. <u>Due to the site constraints the working area has been narrowed and therefore doesn't allow for soil storage in the immediate vicinity of where it was excavated.</u>
2.11	Soil records	Natural England advise that further detail should be added to paragraph 11.3.26 of the CEMP and advise soil stockpiles should be correctly labelled with the footprint, location, volume and type clearly recorded.	Text has been added to paragraph 11.3.26 of the CEMP (Document 7.5 (C))[REP6-021] at Deadline 6 to state 'The records will also include details of the location, volume and soil type to aid reinstatement.'
2.12	Soil storage	Paragraph 11.3.27 of the CEMP provides some detail of how soils will be stored. Natural England advise soils should be stored 'like on like' with topsoil stored on topsoil, and subsoil on subsoil.	Paragraph 11.3.27 of the CEMP (Document 7.5 (C))[REP6-021] already states that 'Topsoil can be stored either on topsoil (of the same type) or on subsoil. However, as subsoil should only be stored on subsoil, topsoil will first be stripped from any land to be used for subsoil storage.' In addition, paragraph 11.3.23 also states 'A separator geotextile will be placed beneath topsoil stockpile areas.' Therefore, no further change to the CEMP is considered necessary.

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
2.13	Soil methodology	As detailed in paragraph 11.3.28 of the CEMP, Natural England support the use of the loose tipping method (as described in the Defra 2009 Construction Code). This method is appropriate only when the soils are in a dry and friable condition.	Noted -The Applicant has no comment on this matter.
2.14, 2.19	Soil surveys	Natural England welcome that the land undergoing temporary disturbance will be restored to its baseline agricultural land classification (ALC) grade. This will be informed by the site-specific soil and ALC surveys.	Noted -The Applicant has no comment on this matter.
2.16	Soil methodology	Reference AS01 of the CoCP states that the CEMP includes 'how the different topsoil and subsoil resources present will be stripped and stockpiled.' However, only one methodology is presented for stripping; stockpiling and reinstatement.	AS01 in the CoCP [REP3-026] is a high-level commitment developed at the start of the project. Further details on the methodology are included in Chapter 11 of the CEMP (Document 7.5 (C))-[REP6-021] .
2.10 and 2.16	Soil storage	Good practice measures should also include: <ul style="list-style-type: none"> Soil stockpiles in place for longer than six months should be seeded. 	Paragraph 11.3.24 of the CEMP (Document 7.5 (C)) [REP6-021] states that 'Management of stockpiles will be undertaken to reduce the risk of silt-laden runoff or dust generation, for example through the use of coverings or through seeding where stockpiles will be in place for longer time periods.' The Applicant notes that other methods including covering could be used instead of seeding. The Applicant also considers that the Main Works Contractor would determine the timing based on risk of dust <u>and run off</u> considering factors such as exposure, season, soil type etc as to when measures are required.
2.16	Working methods	Good practice measures should also include: <ul style="list-style-type: none"> No trafficking/driving of vehicles/plant or materials storage to occur outside designated areas, nor on reinstated soil (topsoil or subsoil). 	Paragraph 11.3.39 of the CEMP (Document 7.5 (C)) [REP6-021] already states that 'Once reinstated, the area will be kept clear of traffic.' The Applicant notes that it cannot commit to no trafficking/driving of vehicles/plant or materials storage to occur outside of soil storage areas, as there will be some light vehicles that may drive over unstripped soil e.g. during landscape planting or testing of the line.
2.16	Soil handling	Good practice measures should also include: <ul style="list-style-type: none"> Only direct movement of soil from donor to receptor areas (no triple handling and/or ad hoc storage). 	Paragraph 11.3.27 of the CEMP (Document 7.5 (C)) [REP6-021] states that 'Soil will be stored within the Order Limits, where it can be left undisturbed and will not interfere with site operations.' In addition, as paragraph 11.3.16 notes that the general principle will be that wherever the working area allows, the stripped material will be removed and stockpiled adjacent to the excavation, i.e. close to the donor site. There will be exceptions where site constraints may require soil to be stored away from the donor site, for example at Alder Carr noted above and also avoiding stockpiles within the floodplain.
2.5 and 2.16	Soil handling	Good practice measures should also include: <ul style="list-style-type: none"> No soil handling to be carried out when the soil moisture content is above the lower plastic limit (the soil is plastic). 	Paragraph 11.3.19 of the CEMP (Document 7.5 (C)) [REP6-021] states 'if sustained heavy rainfall is experienced resulting in soil materials becoming plastic (as assessed by hand), soil stripping activities will be put on hold until the ground has had at least a full dry day or has met the agreed moisture content criteria. Where this is not possible, weather-specific methods will be agreed with the soil scientist prior to work commencing.' The latter would apply when tasks become critical to the programme of this NSIP NSIP, for example for meeting an agreed outage window.
2.15 and 2.16	Weather conditions	Good practice measures should also include: <ul style="list-style-type: none"> Soils should only be moved under the driest practicable conditions and this must take account of prevailing weather conditions- (rainfall "stop" criteria should be included). 	The Applicant cannot commit to stopping work if there is adverse weather as this would put the programme of this NSIP at risk. Such a restriction would create a risk that the Applicant does not meet the required outage windows and therefore the construction programme critical national infrastructure at risk. Also see comment above.
2.16		Good practice measures should also include: <ul style="list-style-type: none"> No mixing of topsoil with subsoil, or of soil with other materials. 	The methodology set out in the Chapter 11 of the CEMP (Document 7.5 (C)) [REP6-021] already describes the method to avoid any mixing of topsoil with subsoil. The Applicant cannot commit to not mixing soil with other materials, as other materials may be required as part of the re-conditioning of the soil or to enable soil stabilisation.
2.16	Soil storage areas	Good practice measures should also include: <ul style="list-style-type: none"> Soil only to be stored in designated soil storage areas. 	The Main Works Contractor would identify the locations for storing soil within the working area. For the cable sections, this would typically be parallel to the cable trenches as show on the Design and Layout Plans Cable Working Cross Section [APP-027].
2.16	Daily records	Good practice measures should also include: <ul style="list-style-type: none"> Daily records of operations undertaken, and site and soil conditions should be maintained. 	The Main Works Contractor would keep daily records of activities undertaken on site. The Applicant does not consider that it is necessary to maintain daily records of soil conditions.

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
2.18	Best and most versatile (BMV) soil	In the absence of a detailed, site-specific soil and ALC survey in the ES and assuming that all mapped ALC Grade 3 land is BMV (i.e. Subgrade 3a), it is not possible to provide an accurate baseline and demonstrate the likely potential impacts. So, whilst this may make the mitigation precautionary, it means that the project is unable to show how it avoids impacts to BMV soils nor the design of potential mitigation to safeguard the soil resources.	The Applicant respectfully disagrees with this statement. The Applicant has assumed that all the soil within the Order Limits could be BMV land, an assumption that has been backed up by the site-specific surveys undertaken at the GSP substation, CSE compounds, the Access Track off the A131, the main construction compound and in the underground cable sections. ES Chapter 11: Agriculture and Soils [APP-079] has rightly considered a realistic worst case which assumes BMV throughout an area that is in the most part under intensive agricultural production. The Applicant considers that the good practice measures would avoid damage to soil, whether this is classified as BMV land or not.
2.20	Permanent loss of BMV land	In the Applicant's response to the issue raised in Natural England's Written Representations regarding permanent loss of soil and how ALC grades have been considered, reference is made to Document 6.2.3, which provides information of the different factors that were considered in the routing of the project. Whilst Natural England acknowledges 'the difficulty in avoiding BMV land within the study area, when almost all land is identified as BMV land,' (Document 8.5.2, p.32), review of Document 6.2.3 shows no areas of ALC land were provided for the options, so it is not possible to compare between options.	High level options appraisal work is based on the Department for Environment, Food and Rural Affairs (Defra) ALC mapping layers for BMV land. As this does not differentiate between 3a and 3b, a precautionary case is made that Grade 3 is BMV land. Using this data source, the four route corridors considered in the Route Corridor Study (October 2009) [REP3-015] would all lie wholly within BMV land, except for an area at and around Hintlesham Woods SSSI and to the south of Ansell's Grove (where a trenchless crossing is proposed to avoid habitats). Therefore, BMV land was not a material differentiating factor between the options which is why this is not referenced in the summary tables.

3. Construction Traffic Management Plan

3.1 Introduction

3.1.1 Table 3.1 sets out the Applicant’s review of submissions received from Interested Parties on the CTMP (~~Document 7.6 (C)~~);[REP6-025]. The Applicant commented on the SCC Responses to Comments on Local Impact Report [REP4-008] at Deadline 5 in relation to the CTMP so these are not duplicated in Table 3.1, other than where amendments are to be made at the next update of this document.

Table 3.1 – Comments on the CTMP

Ref	Matter	Submission from Third Interested Party	Applicant’s Comments
BDC and ECC Deadline 5 Submission - Comments on other submissions received at Deadline 4 [REP5-031]			
TT1.13.21	Highways Monitoring and Enforcement Strategy	<p>The Council maintains our response at Deadline 4 [REP4-049] where we set out the current position on these issues, which are summarised below:</p> <ul style="list-style-type: none"> • Surveying of the condition of the highway network for remediation. Partially resolved. Further information and discussions are needed. • That the local highway authorities (LHA) should be the party responsible for discharging the CTMP and agreeing any changes to the CTMP. This appears to be resolved. • Absence of monitoring of construction and workforce traffic. It is understood that TT02 will ensure GPS monitoring of construction routes and there is an indication that construction traffic will be recorded at paragraph 7.2.4. Further information is sought on what traffic is to be monitored and how vehicle numbers will be reported to the highway authorities. Not considered to be resolved. • Absence of commitment to achieve staff modal share through commitment to minibus and car sharing. Not resolved; there continues to be no commitment to achieve the staff mode share. • Absence of commitments to survey staff movements. The CTMP includes commitment towards surveying of staff movements in the form of a travel survey. This appears to be partially resolved, but further commitment to monitoring of total staff vehicle movements. • Absence of reporting on CTMP monitoring and non-compliance to highway authorities. Not resolved: there is no commitment to report the findings of the monitoring to the highway authorities; nor any meaningful process for remedial actions if the CTMP fails to achieve its targets. • Approval of construction traffic routes. Resolved through inclusion of Construction Routes at Appendix A. 	<ul style="list-style-type: none"> • Surveying the condition of the highway for remediation: Section 5.2 of the CTMP (Document 7.6 (C));[REP6-025] includes details of the visual and photographic surveys that would be undertaken and shared. • Changes to the CTMP: The Applicant has confirmed that the LHA would be the party responsible for discharging and agreeing changes to CTMP (Document 7.6 (C));[REP6-025], as detailed in paragraph 7.6.6. Agreed that this is resolved. <ul style="list-style-type: none"> • Monitoring of construction and workforce traffic: As detailed in paragraph 6.3.5 of the CTMP (document 7.6 (C)), the Applicant would require staff to sign in and out of each work location. These records will be used to assess vehicle movements and occupancy rates and the Applicant can provide this information to the LHA.Monitoring of construction and workforce traffic: • On monitoring of construction traffic. A change has been made to paragraph 6.3.5 of the CTMP at Deadline 6 to confirm that information on staff traffic will be shared with relevant highway authorities. • Monitoring of HGVs: Paragraph 7.2.5 of the CTMP (Document 7.6 (C));[REP6-025] includes details of the monitoring and reporting for compliance with the CTMP, including requirements to; provide GPS tracking for the main works contractor’s HGVs, monitor vehicle numbers between the strategic road network and the site and use the Construction Traffic Routes shown in Figure 1 of Appendix A of the CTMP. This is considered a sufficient and proportional level of monitoring. A change has been made to paragraph 7.2.5 of the CTMP <u>at Deadline 6</u> to commit to sharing information on compliance with HGV routes and discussing further action where required. <p><u>On monitoring workforce traffic, as detailed in paragraph 6.3.5 of the CTMP [REP6-025], the Applicant would require staff to sign in and out of each work location. These records will be used to assess vehicle movements and occupancy rates. A change has been made to paragraph 6.3.5 of the CTMP at Deadline 6 to confirm that information on staff traffic will be shared with relevant highway authorities.</u></p> • Modal share/staff movements: Section 6.4 of the CTMP (Document 7.6 (C));[REP6-025] has been updated at Deadline 6 to provide detail of monitoring, including; the mode of transport; number of crew van movements; number of people sharing cars (average minimum occupancy of 1.3) and crew vans (average minimum occupancy of 4) and car park usage. The Applicant has also committed to a target of 70% of staff travelling to sites using crew vans, with this being a new commitment introduced at Deadline 6. The Applicant is willing to also periodically share information on modal share with the LHAs and discuss potential measures to increase modal share where these targets are not met. • Staff survey: Staff vehicle movements will be monitored for the purposes of assessing whether targets on modal share are being met as described above and as now stated in paragraph 6.3.5- of the <u>CTMP</u>. The Applicant is happy to share this information with the local highway authorities. • CTMP monitoring and non-compliance: as outlined under ‘monitoring of workforce traffic’ and ‘monitoring of HGVs’ above, further commitments to monitor and report CTMP compliance have been added to the CTMP at Deadline 6 (Document 7.6 (C));[REP6-025]. The Applicant is happy to share this data. The non-compliance procedure is detailed in Section 7.3.

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
			<ul style="list-style-type: none"> Approval of construction traffic routes: agreed. The construction traffic route proposed by the LHAs at Sudbury, which avoids the one-way system by utilising Head Lane/Shawlands Avenue, has been included in the CTMP at Deadline 6 (Document 7.6 (C));[REP6-025].
4.2.1	Parking of construction staff vehicles	Monitoring, reporting and enforcement of inappropriate parking should be included in CTMP.	Measures for controlling parking on site are already included in paragraph 6.3.10 of the CTMP (Document 7.6 (C));[REP6-025].
4.2.1	70% of staff travel by crew van.	Include appropriate targets, monitoring and controls within CTMP to ensure modal split.	The Applicant has added a target to the CTMP for 70% of staff to travel using crew vans and 4 personnel per van to address this comment. This has been added to the CTMP at Deadline 6 (Document 7.6 (C));[REP6-025].
6.2.1 – 6.2.4	Construction Routes	<p>For the construction routes within the CTMP that represent the following:</p> <ul style="list-style-type: none"> Henny Road, Bell Hill, Springett's Hill and Lamarsh Hill on sheet 3 of the construction routes. Bures Road to Henny Road shown on Sheet 3 of the construction routes. Church Road through Twinstead on Sheet 4 of the construction routes. Church Road to Wickham St Paul on Sheet 4 of the construction routes. <p>It appears that ES Appendix 12.1 – Traffic and Transport Significance of Effects Tables [APP-134], assumes no HGV traffic will utilise these routes, only staff movements; this is noteworthy due to the routes' rural characteristics and narrowness. The CTMP needs to ensure that general HGV traffic does not utilise these routes to access the site. Church Road and Twinstead Road in particular are very narrow, and do not conveniently facilitate any form of two-way traffic with limited potential for passing. Mitigation in the form of passing bays may still be required.</p> <ul style="list-style-type: none"> Old Road to Wickham St Paul on Sheet 4 of the construction routes. <p>The ES assumes very low levels of HGV traffic will utilise these routes; this is noteworthy due to the routes' rural characteristics and narrowness. The CTMP needs to ensure that no more than the low levels of HGV traffic identified within the ES uses these routes to access the site and be able to evidence the same. Old Road is very narrow and does not conveniently facilitate two-way traffic with limited potential for passing.</p>	<p>Heavy Goods Vehicles (HGV) routes are detailed within Figure 1 of the CTMP (Document 7.6 (C));[REP6-025], and the CTMP is secured via Requirement 4 to the draft DCO (Document 3.1 (FG)). In accordance with good practice measure TT02 in the CoCP [REP3-026], the Main Works Contractor will implement a monitoring and reporting system to check compliance with the measures set out within the CTMP (Document 7.6 (C));[REP6-025]. This will include the need for a GPS tracking system to be fitted to HGV owned and operated by the Main Works Contractor to check for compliance with authorised construction routes.</p> <p>The Construction Routes located<u>identified</u> on Church Road, Twinstead Road and Old Road<u>Figure 1 of CTMP [REP6-025]</u> are considered suitable for their proposed use, however based on the anticipated vehicle type and numbers. Church Road (through Twinstead) and Church Road (to Wickham St Paul) are both for minor works to the existing overhead line e.g. the arcing horns and therefore are anticipated to have limited numbers of vehicles associated with these works. Similarly, Old Road (to Wickham St Paul) is for access for the 132kV cables installation and for works to the existing overhead lines. The main HGV traffic would use the accesses at the GSP substation (H-AP1 and H-AP2) off the A131. The intention would be that construction traffic in this area of the project would primarily use the temporary access route leading to the A131 at H-AP20–<u>once constructed, limiting the construction traffic on alternative routes on the local road network.</u></p>
7.2.1 (4.1)	Clarification on the term 'minibus' and staff vehicles used	<p>The Council welcomes the clarification regarding the crew van. No evidence has been submitted that supports the 70% assumption nor any controls within the CTMP that will ensure it is delivered.</p> <p>Mainly as a result of the two assumptions around car share and staff travel times, the peak figure of 528 staff is assessed as 32 peak hour vehicle movements, which is a reason why a traffic impact has not been identified. It is difficult to see how this can be considered a worst-case assessment.</p>	<p>To address these comments the CTMP (Document 7.6 (C));[REP6-025], has been updated at Deadline 6 to change the word 'minibus' to 'crew vans' throughout. It has also been updated to include a target for 70% of staff to use crew vans and commitments for staff vehicle and occupancy use to be monitored and discussed with the relevant highway authorities if targets are not met.</p> <p>The Applicant considers that this addresses this comment.</p>
7.2.1 (4.1)	Outline CTMP	The Council welcomes the inclusion of the construction routes within the CTMP. The Council maintains its position as set out at Paragraph 21.1.4 of our Deadline 4 Response [REP4-049] that there should be a further iteration of the CTMP, when more information is available from the contractor for discharge by the Highway Authorities.	<p>Response noted regarded inclusion of the Construction Routes in Appendix A of the CTMP (Document 7.6 (C));[REP6-025].</p> <p>The Applicant does not consider it necessary to commit to a future CTMP, as it does not consider additional information regarding construction traffic and routing is required to be submitted outside of the existing processes available through the DCO. The Applicant has, however, updated the CTMP at Deadline 6 to address local highway authority comments.</p>

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
			If changes are necessary to the CTMP following Examination, then these would be subject to LHA engagement to agree changes before commencement of works as detailed in paragraph 7.6.6 of the CTMP (Document 7.6 (C))-[REP6-025].
SCC Response to Action Points from CAH1, ISH2, ISH 3 and ISH 4, received at Deadline 5 [REP5-034]:			
2.10	Abnormal Indivisible Loads (AIL)	The movement of AILs is generally controlled through separate consenting processes, such as Electronic Service Delivery for Abnormal Loads. However, issues with the capacity of Suffolk's bridge stock make it, in SCC view, imperative that a feasible route is determined at this stage, to ensure that access for AILs is at least feasible as issues such as weak bridges and highway constraints identified. The Applicant has proposed control via the specification of routes within the CTMP, which is acceptable subject to the above.	The Applicant has submitted Reports on Abnormal Indivisible Load Access for Cable Drums, Transformers and Shunt Reactors at Deadline 6 (Document 8.8.11). This contains an assessment of the AIL routes which have been added to Appendix A of the CTMP at Deadline 6 (Document 7.6 (C))-[REP6-025].
2.11-2.12	Timing of HGVs	<p>SCC would consider that to give respite to local communities, HGV movements should be restricted to:</p> <ul style="list-style-type: none"> Monday to Friday 0600-2000. Saturday 0600-1400. <p>With exceptions as listed in the which if accepted by the decision makers should give the Applicant the flexibility that they require to deliver the project.</p>	<p>Restricting delivery times is not considered necessary or proportional given the level of traffic expected; the temporary use; the urgency of the programme, the linear nature of the project and due to the construction of temporary access routes.</p> <p>The delivery hours in the TA [APP-061] are considered to be a reasonable worst case; this is very different to being able to secure HGV times on a day-to-day basis. Numerous factors can occur on a particular day that would affect the time an HGV arrives at site, from incidents on the road, delays to deliveries at ports, personnel related delays and so on. An unintended consequence of a requirement to restrict HGV movements may mean that vehicles need to park to wait for 'core hours' with adverse impacts on capacity and safety.</p>
2.13	HGV Access Routes	SCC has raised concerns regarding the suitability of some of the HGV access routes in the Local Impact Report [REP1-044]. The information provided by the Applicant at D4 assists the authority in understanding the movements, but our position remains that controls are necessary to ensure that movements do not exceed those assessed in the Transport Assessment and ES. Our view is that this is consistent with EN1 2023 in 5.14.14 The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic.	<p>The Applicant considers the TA [APP-061] to be based on a reasonable worst-case assessment but does not consider it to be reasonable, proportional, or necessary to secure the vehicle numbers it was based upon. As concluded in the TA [APP-061], the project would not result in substantial HGV traffic movements.</p> <p>Paragraph 5.13.11 of the 2011 Overarching National Policy Statement for Energy (EN-1), states that requirements may be attached to a consent where there is likely to be substantial heavy goods vehicle (HGV) traffic. The Applicant does not consider the project meets this threshold based on the assessments undertaken. Further, Paragraph 5.14.14 of the proposed revised EN-1 reinforces this point.</p>
2.14	Recovery of expenses due to by extraordinary traffic (Highways Act 1989 s59)	SCC considers it proportionate to include an agreement to recover any costs incurred due to damage resulting from traffic associated with this development and this should be recovered through a side agreement or protective provisions. This formalises the arrangement without recourse to a retrospective application through the courts.	Highways Act 1989 s.59 is an existing statutory provision allowing for recovery of expenses, and hence the Applicant submitted at the ISH3 hearing (and again at the ISH6 hearing) that it is not necessary to replace that provision. In this context, the Applicant refers also to the Applicant's Written Summaries of Oral Submissions to Issue Specific Hearing 6 (Document 8.8.4.2)-[REP6-043].
2.15	Emissions	SCC considers that emissions from HGVs should be controlled to minimise pollution from construction traffic. This can be achieved by a commitment in the CTMP for all HGVs to be compliant with EURO IV, although accepting that some specialist vehicles may need to be exempt.	<p>Good practice measure GG12 in the CoCP [REP3-026] states that plant and vehicles will conform to relevant standards for the vehicle or plant type as follows:</p> <ul style="list-style-type: none"> Euro VI (NOx and PM) for lorries, buses, coaches and Heavy Goods Vehicles (excluding specialist abnormal indivisible loads).
2.16	Workers	SCC considers that trips resulting from workers employed on this project should be controlled to ensure that trips do not exceed those assessed in the ES or Transport Assessment. This can be through the monitoring and reporting of vehicles arriving and departing the site(s) or recording numbers of workers and the transport modal split to achieve the same.	See response provided for TT1.13.21 above under 'Monitoring of workforce traffic' and 'Modal share / staff movements.'
2.18 (and table page 8)	Monitoring and Reporting	Controls must be supported with sufficient monitoring and reporting to demonstrate compliance with controls. Summaries of the reports should be made public subject to appropriate data protection being applied.	See response provided for TT1.13.21 above under 'Monitoring of HGVs construction traffic'.

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
SCC Comments on any other submissions received at Deadline 4 [REP5-033]:			
4.1.	Clarification on the term 'minibus' and staff vehicles used	<p>SCC and ECC welcome the clarification regarding the crew van.</p> <p>No evidence has been submitted that supports the 70% assumption, nor any controls within the CTMP that will ensure it is delivered.</p> <p>Mainly as a result of the two assumptions around car share and staff travel times, the peak figure of 528 staff is assessed as 32 peak hour vehicle movements, which is a reason why a traffic impact has not been identified. It is difficult to see how this can be considered a worst-case assessment.</p>	See response provided for TT1.13.21 above under 'Modal share / staff movements' and 7.2.1 (4.1) above on crew vans and the additional commitment on the percentage of staff using crew vans. The Applicant considers that the TA [APP-061]. and the assumptions used provide a reasonable worst-case assessment.
4.1.	The progress of the CTMP	<p>SCC welcomes the inclusion of the construction routes within the CTMP albeit with the reservations expressed in the LIR [REP1-044] and [REP1-045].</p> <p>SCC considers that with the lack of controls and details regarding monitoring, reporting, and enforcement, the CTMP can only be considered a draft or outline and that there should be a further iteration of the CTMP when more information is available from the contractor for discharge by the Highway Authorities. It was assumed that the flexibility sought was included within the Applicant's assumptions made when estimating the parameters assessed in the ES and Transport Assessment.</p>	<p>Whilst the Applicant is seeking to update certain aspects of the CTMP in response to comments provided by the Councils, and notwithstanding that in some cases there is a difference of opinion with the Councils as to the nature and/or extent of controls, this does not mean that the CTMP in overall terms is incomplete and/or insufficiently detailed.</p> <p>Indeed, the Applicant considers that the CTMP provides appropriate information and controls for it to be considered "final" at the end of the Examination and certified as such by the Secretary of State.</p> <p>Should any future changes become necessary that would result in updates being required to the document these would need to be submitted to and agreed by the LHAs, as set out in paragraph 7.6 of the CTMP; or where derogations are necessary then these would be subject to Requirement 1(4) of the draft DCO (document 3.1 (F))[REP6-003]. It should be noted that the approach to, and structure of, the CTMP mirrors that adopted on the Applicant's previous DCOs (see, for example, the Richborough Connection Project and Yorkshire Green).</p>
Essex Police SoCG (Documentdocument 8.8.8.2)			
3.2	Update to The Road Vehicles (Construction & Use) Regulations 1986	Please note this is 18.75m for a draw bar combination vehicle.	Paragraph 5.3.1 of the CTMP (Document 7.6 (C))[REP6-025] has been amended at Deadline 6 to provide compliance with the update to The Road Vehicles (Construction and Use) Regulations 1986.
SCC Post-Hearing Submission for Third Issue Specific Hearing (ISH3) into Transport and Rights of Way [REP4-021]			
3.1f	Peak and average staff numbers	The peak construction staff numbers are estimated in paragraph 4.4.54 of the TA [APP-061] as 350 for the worst-case alternative scenario and an average of 180 per day [APP-091]. SCC has not seen any details of how this number was estimated or evidenced nor whether this includes visitors and support staff. Suffolk Joint LIR [REP1-045] paragraph 12.63 lists the information considered to be lacking in the application. No additional information has yet been provided to SCC.	<p>The peak construction staff numbers are shown in Illustration 4.1 of the ES Chapter 4: Project Description [APP-072] and have been calculated by an experienced contractor from the Applicant's Framework of approved Contractors, who are competent and experienced in delivering similar projects. The contractor has generated workforce numbers for construction of the project including the temporary access routes, removal of the 132kV overhead line, new overhead lines (pylons and conductors), underground cables including CSE compounds and the GSP substation.</p> <p>Given the low number of workers anticipated and that the Applicant has not identified any likely significant effects in relation to this matter, the Applicant does not consider there to be a need to provide a more detailed workforce profile into Examination or to SCC.</p> <p>Worker numbers are only relevant to the TA [APP-061] insofar as they inform assumptions about vehicle numbers. The vehicle numbers are very conservative so unlikely to be exceeded regardless of whether worker numbers exceed the peak estimated. However, a change has been made to the CTMP at paragraph 6.3.5. to agree to share information on staff numbers per work site with the relevant highway authority on a periodic basis.</p> <p>The CTMP (Document 7.6 (C))[REP6-025] states that 'National Grid and its contractor will promote the use of sustainable travel solutions, such as car sharing and use of public transportation. Wherever practicable, operatives will meet at pre-determined locations to share a minibus to the workface to reduce the impact of cars being parked at unsuitable locations.' This sentence should have read 'crew vans' and has been updated in the CTMP at Deadline 6. This demonstrates that the Applicant is committed to reducing vehicle numbers and promoting sustainable travel where practicable. The commitment to shared transport means there is not necessarily a direct relationship between worker numbers and vehicle numbers.</p>

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
ECC/BDC Deadline 4 Submission - Response to Applicant's comments on BDC/ECC Local Impact Report & Other Documents [REP4-049]			
21.1.3	Specific Comments on the Deadline 3 submission: CTMP	Further clarification is needed over paragraph 7.2.5 on the details that the construction vehicle numbers that are being checked against, along with relevant reporting and enforcement procedures.	This commitment provides details on how the Applicant (and their contractor) would monitor and report deviations from HGV routing secured in the CTMP and discuss further mitigation measures with LHA should they be required. The mention of traffic numbers in the previous version was an error given that traffic numbers are not secured in the DCO. The CTMP (Document 7.6 (C)) [REP6-025] has been amended at Deadline 6. However, the Applicant would also record traffic movements at each site and can share this information with the LHA.

4. Landscape and Ecological Management Plan

4.1 Introduction

Table 4.1 sets out the Applicant's ~~review of comments on~~ submissions received from Interested Parties on the LEMP at Deadline 4, ~~5~~ and ~~at~~ Deadline 5. ~~No submissions have been specifically received in relation to the LEMP appendices: Appendix A: Vegetation Retention and Removal Plan [APP-183], Appendix B: Vegetation Reinstatement Plan [REP3-036] and Appendix C: Planting Schedules [APP-185]. However, these will be updated at Deadline 7 to reflect the following changes:~~

- ~~• LEMP Appendix A: Update to include new veteran tree embedded measure and to update vegetation loss assumptions at woodland without an existing maintained swathe to reflect submissions from Interested Parties regarding concerns about a graduated swathe;~~
- ~~• LEMP Appendix B: Update to reflect the changes to the vegetation loss assumptions noted above and to add some additional planting requested by the Local Planning Authorities; and~~
- ~~• 4.1.1 LEMP Appendix C: Update to reflect the proposed changes received from the Local Planning Authorities with regards to species types and sizes.~~

Table 4.1 – Comments on the LEMP

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
SCC Responses to Comments on Local Impact Report Annex A – Control Document Review in Relation to Landscape and Visual Impacts [REP4-008]			
N/A	General	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. In addition to the following points, SCC shall provide a tracked-change version of the D3 LEMP for Deadline 5, therefore these comments are unlikely to be comprehensive at this stage.	The Applicant has commented on the points raised at Deadline 5 in the table below underneath the heading Landscape and Ecological Management Plan Document Review [REP5-036]. <u>The Applicant disagrees with the comment that the LEMP is not acceptable as a final LEMP.</u> <u>There remains disagreement between the Applicant and the relevant planning authorities over what detail it is necessary and proportionate to secure in the Management Plans.</u>
N/A	Purpose of the LEMP	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).	No change is proposed to the LEMP. Paragraph 1.3.1 of the LEMP (Document 7.8 (C)) states that the LEMP already 'sets out how land, vegetation and habitats will be reinstated following construction <u>together with the subsequent aftercare and, where applicable, monitoring arrangements.</u> '
N/A	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.	The LEMP will be <u>has been</u> amended at Deadline 7 to include a landscape architect in the list of specialists included in Table 3.1. Further clarification will also be <u>has been</u> added <u>in paragraph 3.2.3</u> about specialist roles and when these would be called upon.
N/A	Vegetation Reinstatement Plan	The Vegetation Reinstatement Plan 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.	No change is proposed to the LEMP. Reinstatement planting is shown on LEMP Appendix B: Vegetation Reinstatement Plans [REP3-036] <u>(Document 7.8.2 (C))</u> and the planting schedules are provided in LEMP Appendix C: Planting Schedules [APP-185] <u>(Document 7.8.3 (B))</u> and provide details of the planting mix, sizes and density. The schedule of plants, numbers, species, sizes and density are also covered within Requirement 9 of the draft DCO (Document 3.1 (F)) <u>[REP6-003]</u> . The Applicant considers these to be sufficient to show the extent of reinstatement that is proposed. The Applicant also notes that the GSP substation has been consented by BDC via a planning application (planning application reference 22/01147/FUL) under the Town and Country Planning Act: <u>(TCPA)</u> .
N/A	Vegetation Reinstatement Plan	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.	No change is proposed to the LEMP. LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] <u>(Document 7.8.2 (C))</u> is presented at a scale that is considered suitable for the application for development consent. The Applicant welcomes further feedback on which labels are unclear and will then review whether changes can be made.
N/A	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.	No change is proposed to the LEMP. Table 6.2 in the LEMP [REP3-034] <u>(Document 7.8 (C))</u> sets out the measures with regards to veteran trees and has been written in accordance with the Standing Advice by Natural England and the Forestry Commission. This sets out the specific measure proposed for each veteran tree on a case-by-case basis, noting only one veteran tree would be affected by the project, and this is subject to a specific mitigation measure (EM-G13) agreed with BMSDC. This is the same approach agreed with Natural England and the Forestry

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
			Commission on the Southampton to London Pipeline Development Consent Order, see Appendix C of the LEMP on that project (project reference EN070005 [REP6-028]).
N/A	Paragraph 6.4.2	SCC considers that the protection of hedgerows too vague.	<p>Section 6.4 of the LEMP [REP3-034](Document 7.8 (C)) describes measures for the protection of hedgerows that deare not requirerequired to be removed. The Applicant will updatehas updated the text further at Deadline 7 to include the following details as requested by the Councils.</p> <p>a. The topsoil (including any bank) from beneath the hedgerow would be stripped and stored separately.</p> <p>b. Vegetation and topsoil from any associated ditch would be stripped and stored separately.</p> <p>c. Soil storage areas would be clearly signed and demarcated to prevent any mixing with other soils.</p>
N/A	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 root protection area (RPA), including protective measures must be supervised by a suitably qualified Arboriculturist.	No change is proposed to the LEMP. As stated in paragraph 6.2.5 of the LEMP [REP3-034](Document 7.8 (C)), and in accordance with the British Standard 5837 (2012) Trees in Relation to Design, Demolition and Construction, the type of barrier will be provided dependent on the level of risk posed to the RPA and to suit the location in accordance with clause 6.2.2.3 of BS 5387:2012, as agreed with the arboriculturalist on site. The Applicant considers that paragraphs 6.2.13 to 6.2.15 of the LEMP [REP3-034](Document 7.8 (C)) provide a clear approach to vehicle access within an RPA.
N/A	Planting Schedules	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.	The species proposed in LEMP Appendix C: Planting Schedules [APP-185](Document 7.8.3 (B)) were chosen based on the results of the ecology surveys that were undertaken for the project and species present within the landscape. The Applicant considers the species mixes proposed to be suitable to the landscape and environment within which they would lie. However, the Applicant will also add has added a sentence to <u>paragraph 8.2.1 of</u> the LEMP at Deadline 7 to say that the species in Appendix C: Planting Schedules can be fine-tuned during the discussions with the Local Planning Authorities as part of in accordance with the discharge of Requirement 9 of the draft DCO (Document 3.1 (F)) [REP6-003].
N/A	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.	The species proposed in LEMP Appendix C: Planting Schedule [APP-185](Document 7.8.3 (B)) were chosen based on the results of the ecology surveys that were undertaken for the project. <i>Tilia cordata</i> (small leaved lime) was recorded and has been included within Hedgerow Mix H2, which is species rich hedgerow mix with trees. <i>Sambucus nigra</i> has also been included as it is fast growing and good for birds, bees and butterflies. However, the Applicant will update has updated the proposed species in Appendix C: Planting Schedule at Deadline 7 to remove <i>Sambucus nigra</i> from the proposed mix.
N/A	Species mixes	The percentages of certain species within some species mixes seem inappropriate, such as 20% of <i>Prunus spinosa</i> (suggest 5%).	<i>Prunus spinosa</i> (blackthorn) and <i>Crataegus monogyna</i> (hawthorn) typically make up the majority of hedgerow mixes as they create a good dense hedge and 20% <i>Prunus spinosa</i> is not uncommon. However, the Applicant will update has updated the proposed species in <u>Table 4.1 and 4.2 of</u> LEMP Appendix C: Planting Schedules (Document 7.8.3 (B)) at Deadline 7 to reduce the proportion of <i>Prunus spinosa</i> from 20% to 10% .
N/A	Proposed sizes for trees	<p>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.</p> <p>SCC 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>	The trees listed in Table 3.1 and Table 4.2 of LEMP Appendix C: Planting Schedules [APP-185](Document 7.8.3 (B)) have been included to allow for a more immediate screening effect and to allow for a variety of available sizes during detailed design. The sizes are typical and not unusual to other similar planting schemes. The Applicant would be responsible for the establishment of any planting proposed in accordance with LEMP [REP3-034](Document 7.8 (C)). However, at the Councils' request, the Applicant will look to reduce has reduced the size of <u>some of</u> the trees proposed in LEMP Appendix C: Planting Schedules (Document 7.8.3 (B)) at Deadline 7.

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
N/A	Prototype LEMP	Prior to construction a detailed LEMP would be produced for each stage of the works including details of all proposed hard and soft landscaping works, such as:	No change is proposed to the LEMP. The Applicant does not consider a need to produce <u>a further detailed LEMP at each stage</u> and has responded to where the existing LEMP serves the purpose or where further control is unnecessary. Further discharge of the LEMP at each stage would put at risk the construction programme of the project. <u>However, Requirement 9 of the draft DCO [REP6-003] states that 'Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may be brought into operational use until, for that stage 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.'</u>
N/A	Planting schedules	a. Finalised location, number, species, sizes and density of any proposed planting, including any trees	No change is proposed to the LEMP. The location, number, species sizes and density is already secured in the LEMP as per LEMP Appendix B: Reinstatement Plan [REP3-036] <u>(Document 7.8.2 (C))</u> and LEMP Appendix C: Planting Schedules [APP-185] <u>(Document 7.8.3 (B))</u> . Requirement 9 of the draft DCO (Document 3.1 (F)) <u>[REP6-003]</u> also states that <i>'Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may be brought into operational use until, for that stage, 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.'</i>
N/A	Planting environment	b. cultivation, importing of materials, protection, and weed control to ensure plant establishment	<p>The Applicant is unsure what is meant by cultivation in relation to the LEMP and considers that this matter may be covered in Chapter 11: Agriculture and Soils in the CEMP (Document 7.5 (C))<u>[REP6-021]</u>.</p> <p>The Applicant assumes that importing of materials is related to the provenance of plants. This is covered in paragraph 8.2.2 of the LEMP [REP3-034]<u>(Document 7.8 (C))</u> which states that <i>'Trees and shrubs will be of local provenance (to reduce risks associated with disease when importing stock from overseas sources) and consideration will be given to resilience to climate change. They shall be supplied in accordance with BS 8545:2014 Trees: from nursery to independence in the landscape (British Standards Institution, 2014).'</i></p> <p>Protection is covered in Chapter 6 of the LEMP [REP3-034]<u>(Document 7.8 (C))</u>, which covers protection of vegetation to be retained on the project.</p> <p>Weed control is described in paragraph 9.2.1 of the LEMP [REP3-034]<u>(Document 7.8 (C))</u> which states <i>'The five-year aftercare includes inspections by a suitably experienced professional for all reinstated woodland, hedgerows, tree belts and individual trees to apply herbicide to maintain weed-free plant circles around base of transplants and spot-treat undesirable species, having regard to any restrictions on use of herbicides in certain locations, for example, in proximity to watercourses or other sensitive habitats. Selective hand weeding may be required where there are no suitable alternative methods.'</i></p>
N/A	Ground levels	c. proposed finished ground levels	No change is proposed to the LEMP, as paragraph 8.3.2 already says <i>'Topsoil is pulled from the heap using excavator buckets and displaced gradually to the correct grade using either excavators or bulldozers as reinstatement progresses and topographic levels are checked regularly by Global Positioning System (GPS) survey equipment so that reinstatement reflect the existing profile before construction commenced, wherever practicable.'</i>
N/A	Hard landscape features	d. hard surfacing materials	No change is proposed to the LEMP, as hard surfacing is limited to the permanent access tracks/routes to the GSP substation and the CSE compounds. These are functional features and the Applicant does not consider it to be necessary for this information to be provided to the Councils for approval. EM-G14 was added to the REAC at Deadline 5 (Document 7.5.2 (D)) in relation to the surfacing of the permanent access track at Stour Valley East CSE compound, and states 'A landscape architect will be involved in the detailed design to advise on suitable finishes for the permanent access route at Stour Valley East CSE compound as part of reducing the landscape and visual effects of this feature.' in the LEMP. However, Requirement 9(2) of the draft DCO [REP6-003] was updated at Deadline 6 to say that the reinstatement planting plan must include a landscape plan for each CSE compound where relevant to that stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.

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N/A	Pedestrian access and parking	e. vehicular and pedestrian access, parking and circulation areas	No change is proposed to the LEMP, as the Applicant assumes that this is in relation to the CSE compounds and GSP substation which would be operational sites. These areas would be unmanned, therefore there is no parking required at the sites other than for an occasional operational vehicle for staff undertaking an inspection or maintenance check.
N/A	Minor structures	f. minor structures, such as furniture, refuse or other storage units, signs and lighting	<p>The Applicant is unclear about what minor structures, such as furniture, refuse or other storage units the Councils are referring to in relation to this project. No permanent signage is anticipated on the project other than at the permanent access points at the entrance to the GSP substation and the CSE compounds and signage required for operational safety.</p> <p>The only permanent lighting would be the security lighting proposed at the GSP substation. This security lighting would be low lux level light-emitting diode type luminaires with directable light output and passive infrared sensor motion activated lighting at the access gates to facilitate safe entry at night. As the GSP substation has been granted planning consent under the TCPA, the Applicant does not see a need to provide further details in the LEMP.</p>
N/A	Services	g. proposed and existing functional services above and below, ground, including drainage, power and communications cables and pipelines, manholes and supports	No change is proposed to the LEMP. The Main Works Contractor will undertake a full service check as part of their risk assessments for construction of the project. The relocation of existing services has been considered as part of the vegetation assumptions shown on LEMP Appendix A: Retention and Removal Plan [APP-483] (Document 7.8.1 (B)) and LEMP Appendix B: Reinstatement Plan [REP3-036] (Document 7.8.2 (C)) .
N/A	Tree and hedge protection	h. details of existing trees and hedges to be retained with measures for their protection during the construction period	No change is proposed to the LEMP. LEMP Appendix A: Retention and Removal Plan [APP-483] (Document 7.8.1 (B)) shows the trees and hedges that would be retained on the project. Chapter 6 of the LEMP [REP3-034] (Document 7.8 (C)) sets out the measures to protect trees (Section 6.2 and 6.3) and hedgerows (Section 6.4).
N/A	Historic landscape features	i. retained historic landscape features such as ditches and banks and proposals for restoration, where relevant	No change is proposed to the LEMP, as this is already covered in both the LEMP [REP3-034] (Document 7.8 (C)) and the CoCP [REP3-026] . Paragraph 8.3.2 of the LEMP [REP3-034] (Document 7.8 (C)) states 'Topsoil is pulled from the heap using excavator buckets and displaced gradually to the correct grade using either excavators or bulldozers as reinstatement progresses and topographic levels are checked regularly by Global Positioning System (GPS) survey equipment so that reinstatement reflect the existing profile before construction commenced, wherever practicable.' Whilst good practice measure H05 in the CoCP [REP3-026] states 'A topographic survey will be undertaken in advance of construction of each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the lane, including banks and ditches. During construction, the contractor will seek to limit the working area to the narrowest section of the lane that is practicable for the specific works. Any historic features associated with the lane will be reinstated at the end of construction to the pre-work condition, including the replanting of hedgerows and reinstatement of historic earthworks.'
N/A	Implementation timetable	j. implementation timetables for all landscaping works	No change is proposed to the LEMP as Requirement 10 of the draft DCO (Document 3.1 (F)) [REP6-003] states that 'all reinstatement planting works... must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use'.
N/A	Soil measures	k. soil retention, handling and protection (including replacing woodland soils within the woodlands on completion)	No change is proposed to the LEMP, as this is already included in Chapter 11 of the CEMP (Document 7.5 (C)) [REP6-021] which describes soil retention, handling and protection of soils and that soils would be replaced in situ.
N/A	Sustainable drainage	l. The provision of a scheme of sustainable drainage will be integrated into the scheme	No change is proposed to the LEMP, as this is already described in the CEMP (Document 7.5 (C)) [REP6-021] which states in paragraph 9.3.7: 'In accordance with good practice measure AS05, land drains and ditch locations will be identified based on existing land drainage plans and/or site observations. Where required, land drainage will be installed (either temporary or permanent) to maintain the integrity of existing field drainage systems for the duration of works. Drainage systems however will not be installed into areas where they are not currently present, e.g. environmental wetlands. The actual condition and characteristics (e.g. depth of installation, pipe type and

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			diameter) of the existing drainage will be recorded upon excavation. Landowners will be consulted during the pre-construction surveys to establish the existing underdrainage within those areas to be disturbed during construction.'
N/A	Details at the CSE compounds	m. the details of hard and soft landscaping works at the CSE compounds	The soft landscaping at the CSE compounds is shown on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] (Document 7.8.2 (C)). The Applicant has also updated Requirement 9 of the draft DCO (Document 3.1 (F)) [REP6-003] at Deadline 6 to state that: 'Unless otherwise agreed with the relevant planning authority, the reinstatement planting plan submitted under sub-paragraph (1) will include a landscape plan for the cable sealing end compound where relevant for the stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.'
N/A	Details at the CSE compounds	n. Integration of CSE compound design principles.	The Applicant is unsure what is meant by this comment. The CSE compound would be designed to National Grid standards suitable to its purpose. However, the Applicant has also updated Requirement 9 of the draft DCO (Document 3.1 (F)) [REP6-003] at Deadline 6 to state that: 'Unless otherwise agreed with the relevant planning authority, the reinstatement planting plan submitted under sub-paragraph (1) will include a landscape plan for the cable sealing end compound where relevant for the stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.'
N/A	Veteran trees	o. A mitigation strategy, if required, for the loss of any veteran trees or trees with veteran characteristics and how it would be implemented.	There is only one veteran tree (T378) that is anticipated to be lost on the project. The Applicant has made a commitment (EM-G13) with regards to this tree, which is secured in the REAC (Document 7.5.2 (D)) [REP6-023]: 'EM-G13: Veteran tree T378 has a historic primary union failure at 3m which has internal hollowing within large cavities and deadwood present. It is likely that it will need to be felled due to its location within the cable swathe. Where the removal of the tree is necessary, the compensation will comprise soft felling of the tree (in accordance with the final bat licence where applicable). If the limbs are not rotten and have suitable veteran features, then these will be attached to a suitable retained tree(s) within the Order Limits as close as practicable to the lost tree. Where attaching the limbs is not suitable (e.g. if rotten or if these have no veteran features), then the wood will be retained on site as a log pile to retain a habitat function. In addition, another tree will be veteranized as compensation for the loss of T378. The tree to be veteranized will be identified by an arboriculturalist who will also advise on the method for veteranisation, with advice from an ecologist on how to achieve the most habitat value.'
N/A	Planting over cables	p. Where trees cannot be planted over the cables, habitat continuity would be maintained through planting of shrub species	No change is proposed to the LEMP, as scrub planting (over cables) is already shown over the cable sections on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] (Document 7.8.2 (C)).
N/A	Browsing	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>No change is proposed to the LEMP as it will be the Applicant's responsibility to protect new trees and hedge planting from browsing, otherwise the required habitat objectives would not be met.</p> <p>The Applicant is not intending to use stock or rabbit proof fencing to protect against deer at length, as this is impractical on a linear project of this nature and it would create a barrier for other species. Paragraph 8.2.2 of the LEMP [REP3-034] (Document 7.8 (C)) states that 'Tree and shrub planting areas will initially be protected to shield young trees from browsing rabbits and deer during establishment, for example using tree/shrub shelters or fencing. Protection, for example fencing will also be considered around planting'. Paragraph 9.1.4 of the LEMP [REP3-034] (Document 7.8 (C)) also states that 'Checks will also be made to identify the success of protective measures to avoid browsing by deer and rabbits to see if additional management measures are required to encourage growth and development of the reinstatement planting... These checks will identify whether additional measures need to be undertaken so that vegetation re-establishes in these areas. This could include additional planting.'</p> <p>The Applicant will add additional has added wording to paragraph 8.4.2 of the LEMP at Deadline 7 to state that coppiced stools will be protected during operation re-establishment by using vegetation cleared from the specific site <u>location</u> during construction to create protective areas around the stools or dead hedges around group of stools to reduce the risk of animal browsing.</p>

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N/A	Annual inspections	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.	The Applicant does not consider there to be a requirement for joint annual inspections with the Local Planning Authorities however if considered beneficial to all parties this could be organised at the relevant time. The Applicant notes that it <u>(and its framework suppliers)</u> undertakes similar activities to that proposed on the project across its network and is used to implementing landscape contracts on its projects.
N/A	Aftercare	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.	No change is proposed to the LEMP, as Requirement 10 of the draft DCO (Document 3.4 (F)) [REP6-003] states that 'Any trees or hedgerows planted as part of an approved reinstatement planting scheme that, within a period of 5 years after planting, are removed, die or become in the opinion of the relevant 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 approved by the relevant planning authority.'
N/A	Aftercare	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.	The Applicant considers it to be standard process to commit to a five-year aftercare period on the planting undertaken as part of the project. In general, this consists of reinstatement of hedgerows and regrowth of coppiced vegetation, both of which are likely to be well established at the end of 5 five years. The Applicant has committed to longer duration of aftercare for the embedded planting (for the life of the associated asset) (measures EM-D01, EM-F01, EM-G03, EM-G06, EM-H02 in the REAC (Document 7.5.2 (D)) ; [REP6-023] , and at the mitigation woodland planting area to the north of Hintlesham Woods, where a longer duration would be required to reach the required habitat objectives.
N/A	Hedgerow prescriptions –	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: 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. c. Soil storage areas would be clearly signed and demarcated to prevent any mixing with other soils.	The Applicant will update has updated the LEMP (Document 7.8 (C)) at Deadline 7 to include reference to the following hedgerow measures as requested by the Councils: 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. c. Soil storage areas would be clearly signed and demarcated to prevent any mixing with other soils.
N/A	Hedgerow prescriptions –	Measures for Important Hedgerows under the Hedgerow Regulation 1997 to be included in the LEMP. 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:	See detailed responses below.
N/A		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	No changes are proposed as the LEMP Appendix A: Vegetation Retention and Removal Plans [APP-183] (Document 7.8.1 (B)) already show the minimum widths required to safely construct the project. The Applicant has <u>already</u> sought to minimise the width of hedgerow crossings and the intervention, the required widths and method are explained further in ES Chapter 4: Project Description [APP-072].
N/A		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.	No change is proposed as the LEMP already includes these details, as shown on the plans in LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183] (Document 7.8.1 (B)) which shows that hedgerows within the cable swathe would need to be removed (including roots) to install the cables and then would be reinstated as shown on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] ;(Document 7.8.2 (C)). It would not be practicable, as it would significantly affect the programme, <u>require additional land</u> and cost of the project, to coppice and remove each hedgerow species prior to installing the underground cables. These would then need to be stored <u>and maintained</u> for up to four years until

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			<p>after testing of the transmission line, when replanting could be undertaken- if the translocation had been successful.</p> <p>Coppicing would be used as a measure within some parts of the overhead line areas, as shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183](Document 7.8.1 (B)).</p>
N/A		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>No change proposed in the LEMP, this would not protect soil structure in locations where heavy goods vehicles are required. It is important to protect the soil as well as the seedbank within the topsoil.</p> <p>The contractor would choose the lowest form of intervention suitable. Stone access routes are expensive and take time to install and reinstate and would not be used if there wasn't a project need based on the vehicle types and need to protect the soil structure. Trackway is proposed in locations which do not require heavywhere this is appropriate for the construction vehicles required to undertake the activity. Stone access routes would be required in the cable sections due to the delivery of the cable drums. Stone access routes would also be required in the overhead line sections where a crane and/or piling rig is required to construct the pylons.</p>
N/A	Post construction	d. Banks and ditches would be reformed to similar profiles as before.	No change is proposed, as paragraph 8.7.1 of the LEMP [REP3-034] (Document 7.8 (C)) already states that 'Watercourses will be reinstated to at least the same condition as prior to construction. This includes reinstatement of the bank profile, bed levels and gradients.'
N/A	Topsoil replacement	e. Topsoil would be replaced after works in the reverse order that it was excavated to distinguish its difference from other stored topsoil	No change is proposed to the LEMP as paragraph 11.3.36 of the CEMP (Document 7.5 (C)) [REP6-021] states that 'Soil reinstatement is the reverse of soil stripping with topsoil being replaced over subsoil. Soil horizons will be replaced to the correct thickness.'
N/A	Planting season	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.	<p>No change is proposed to the LEMP as Requirement 10 of the draft DCO (Document 3.1 (F))[REP6-003] states that 'all reinstatement planting works... must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use'.</p> <p>Defra Metric 3.1 has been used to demonstrate reinstatement of the baseline conditions and the Environmental Gain Report [APP-176] sets out the enhancements proposed to deliver the 10% net gain. This is instead of a ratio approach.</p>
N/A	Planting mixes	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	<p>No change is proposed to the LEMP as paragraph 8.2.3 of the LEMP [REP3-034](Document 7.8 (C)) already states that 'The proposed species mixes and typical stock sizes for the main planting reinstatement types are set out in the table in Appendix C and are cross-referenced on the Vegetation Reinstatement Plan in Appendix B. These generally reflect existing species compositions and habitat types identified within the ecological and arboricultural surveys, where these were considered appropriate.'</p> <p>Paragraph 8.2.2 of the LEMP also states that 'Trees and shrubs will be of local provenance (to reduce risks associated with disease when importing stock from overseas sources) and consideration will be given to resilience to climate change.'</p> <p>A Hedgerow Regulations 1997 assessment has been undertaken for hedgerows in the Order Limits and can be found in ES Appendix 7.5: Important Hedgerows Assessment [APP-115].</p>
N/A	Species composition	h. A schedule of species composition for reinstatement would be provided	No change is proposed to the LEMP, as LEMP Appendix C: Planting Schedules [APP-185] (Document 7.8.3 (B)) already provides this. Requirement 9 of the draft DCO (Document 3.1 (F)) [REP6-003] also states 'The reinstatement planting plan submitted under sub-paragraph (1) must include a schedule of trees, hedgerows or other plants or seedlings to be planted, noting numbers, species, sizes and planting density of any proposed planting or seedlings.'
N/A	Detailed scheme of hedge planting	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.	<p>No change is proposed to the LEMP as these details are already provided in the LEMP (or CEMP) as follows:</p> <ul style="list-style-type: none"> Soil restoration and ground preparation is contained in Chapter 11 of the CEMP (Document 7.5 (C)):[REP6-021]:

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			<ul style="list-style-type: none"> Species choice, stock size and spacing can be found in LEMP Appendix C: Planting Schedules [APP-485];(Document 7.8.3 (B)); Weed control is described in Section 9.2 of the LEMP [REP3-034];(Document 7.8 (C)); and The aftercare is 5 years (unless stated otherwise) as per Requirement 10 of the draft DCO (Document 3.1 (F));[REP6-003].
Landscape and Ecological Management Plan Document Review [REP5-035]			
N/A	General	Changing nature of document from LEMP to Outline LEMP. The document contains multiple references to the document being an Outline LEMP (oLEMP) and for the need for a 'Final' LEMP.	The Applicant does not consider a need to change the document to an Outline LEMP as it considers all relevant aspects are included within the <u>final</u> LEMP [REP3-034];(Document 7.8 (C)) and has responded to specific matters below.
1.1.2	Refinements	Proposed deletion of ' <i>It is recognised that there may be minor refinements through examination process as part of the application for development consent</i> '.	The text will be has been deleted from the LEMP (Document 7.8 (C)) at Deadline 7 to reflect the Councils' proposed text.
1.2.8	Aftercare period	Proposed deletion of text as follows 'National Grid, UKPN and any appointed contractors will carry out all work in accordance with the OLEMP during the construction, reinstatement and five-year aftercare period of the project unless a longer period has been defined through the project commitments (see paragraph in 9.1.2 of the LEMP) or if otherwise agreed with the relevant planning authority'	No change is proposed to the LEMP, as this aligns with the wording of Requirement 10 of the draft DCO (Document 3.1 (F));[REP6-003] which states that ' <i>Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of 5 years after planting, are removed, die or become in the opinion of the relevant 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 approved by the relevant planning authority.</i> '
1.3.1	Purpose of the LEMP	The purpose of the LEMP is to set out <i>outline</i> how landscape and ecological features such as landform, watercourses, vegetation (including trees) and habitats will be protected and managed during construction. It also sets out and how land, vegetation and habitats will be reinstated following construction, together with the subsequent aftercare and, where applicable, monitoring arrangements, <i>reflecting the results and recommendations of relevant surveys and impact assessments.</i>	The text will be has been amended in the LEMP (Document 7.8 (C)) at Deadline 7 to reflect the Councils' proposed text.
New	Purpose of the LEMP	The contractor will be responsible for implementing the measures outlined within the LEMP and associated management plans. The final detail of the mitigation and enhancement measures will be provided through the Landscape and Ecological Management Plan(s) (LEMPs), to be agreed with the relevant authorities, pursuant to Requirements XX and XX of the draft DCO.	The Applicant does not consider a need to change the document to an Outline LEMP as it considers all relevant aspects are included within the LEMP [REP3-034];(Document 7.8 (C)) and has responded to specific matters below.
1.3.2	Objectives of the LEMP	The objectives of the <i>OLEMP</i> , as the basis for these more detailed future plans, are to	The Applicant does not consider a need to change the document to an Outline LEMP as it considers all relevant aspects are included within the LEMP [REP3-034];(Document 7.8 (C)) and has responded to specific matters below.
1.3.2	Objectives of the LEMP	Provide a mechanism for the delivery of landscape and ecological measures (other than those which will be secured through specific requirements of the DCO), to avoid, <i>minimise and</i> compensate for environmental effects identified in the Environmental Statement (ES);	No change is proposed to the LEMP, as the Applicant has used the word 'reduce' throughout the application documents including the ES and the management plans and therefore proposes to stick with this term in terms of consistency across the documents.
1.3.2	Objectives of the LEMP	<i>To clearly outline the framework for ecological management and agree timetables for submission, after consultation with the relevant planning authority;</i>	The Applicant does not consider the need for this bullet as the implementation timetable is defined in Requirement 10 of the draft DCO (Document 3.1 (F));[REP6-003] which states that ' <i>Unless otherwise agreed with the relevant planning authority, all reinstatement planting works referred to in Requirement 9 must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use</i> '.
1.3.2	Objectives of the LEMP	<i>To outline the provision of the details that would form both species protection and landscape mitigation and compensation planting schemes;</i>	The text will be has been amended in <u>paragraph 1.3.2 of</u> the LEMP (Document 7.8 (C)) at Deadline 7 to state 'To outline the provision of the details that would form both species protection and landscape mitigation (including compensation for habitats lost) planting schemes.'

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
1.3.2	Objectives of the LEMP	<i>To provide the basis for the agreement of a detailed Landscape Scheme for the CSE compound and substation sites with an aftercare for the duration of the operational phase.</i>	<p>The LEMP already sets out the landscape planting proposed at the CSE compounds and the GSP substation site, as shown on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036]-(Document 7.8.2 (C)). The Applicant has also updated Requirement 9 of the draft DCO (Document 3.1 (F))[REP6-003] at Deadline 6 to state that: 'Unless otherwise agreed with the relevant planning authority, the reinstatement planting plan submitted under sub-paragraph (1) will include a landscape plan for the cable sealing end compound where relevant for the stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.'</p> <p>The Applicant does not consider this necessary at the GSP substation, where BDC has been provided with a landscape plan for the planning application (planning application reference 22/01147/FUL) consented under the TCPA. There is no planting proposed within the Bramford Substation boundary.</p>
1.3.2	Objectives of the LEMP	<i>One for one replacement planting of failed plants would only be required for the first 5 years. Replacement planting after this date may be requested at the discretion of the relevant Local authority.</i>	<p>The Applicant does not see the need for this specific bullet to be included in the purpose of the LEMP as Requirement 10 of the draft DCO (Document 3.1 (F))[REP6-003] states: 'Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of 5 years after planting, are removed, die or become in the opinion of the relevant 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 approved by the relevant planning authority.'</p>
1.3.2	Objectives of the LEMP	<i>This scheme will detail how ecological landscape and Sustainable Drainage System (SuDS) requirements will be integrated at the CSE compound and substation sites. For this, a SuDS drainage strategy will be developed in accordance with DCO Requirement XX relating to a Surface Water and Drainage Management Plan, taking into account provisions of the Outline Landscape and Ecological Management Plan;</i>	<p>The Applicant does not see the need for this specific bullet to be included in the purpose of the LEMP because paragraph 4.9.24 of ES Chapter 4: Project Description [APP-072] states that the CSE compounds would have porous surfacing (such as soakaways or French drains) to allow surface water to naturally infiltrate to greenfield rates without the need for formal drainage.</p> <p>The GSP substation (which has been consented under a separate TCPA planning application (planning application reference 22/01147/FUL)) would include permanent surface and foul drainage systems. The drainage design would be in accordance with the requirements of the Essex County Council SuDS Design Guide (2020) and would include allowances for climate change in accordance with current Environment Agency requirements (good practice measure W12 in the CoCP [REP3-026]). All remaining areas are likely to contain porous surfacing to allow surface water to naturally infiltrate without the need for formal drainage.</p> <p>Requirement 5 of the draft DCO (Document 3.1 (F))[REP6-003] states that no stage of the authorised development may be brought into operational use until, for that stage, a Drainage Management Plan, to address operational surface water management matters, has been submitted to and approved by the relevant highway authority.</p>
1.3.2	Objectives of the LEMP	<i>To provide the basis for the agreement of a detailed Landscaping Management Plan for the protection and restoration of trees and hedges in the cable corridor, with an aftercare period of five years for hedges and ten years for trees;</i>	<p>As noted above, the Applicant does not consider there is a need for a detailed landscape management plan. The Applicant has committed to five years of aftercare, as per Requirement 10 in the draft DCO (Document 3.1 (F))[REP6-003]. The Applicant has also identified specific areas where a longer duration aftercare period would be undertaken - see paragraph 9.1.2 of the LEMP [REP3-034]-(Document 7.8 (C)).</p>
1.3.2	Objectives of the LEMP	<i>It is expected that the schemes of planting and aftercare for the both the cable corridor and CSE compound and substation sites would be delivered by contractors who can demonstrate appropriate experience and capacity to deliver effective and robust aftercare and provide a consistent quality of work across the whole project. The relevant Local Authorities would seek to work collaboratively with National Grid to develop planting specifications for tendering for this work;</i>	<p>The Applicant uses competent framework contractors to deliver its projects. These contractors have to submit tenders at both the framework level and project level to show how they are qualified to deliver National Grid projects. As this is a commercial process between National Grid and its contractor, the Applicant does not consider it appropriate to involve the Councils in the tendering process.</p>
1.3.2	Objectives of the LEMP	<i>To provide a single document for all ecological mitigation considerations on site e.g. a single reference for the Ecological Clerk of Works (ECoW);</i>	<p>The text will behas been amended in the LEMP at Deadline 7 to reflect the Councils' proposed text for the objectives of the LEMP. However, the Applicant notes that the terminology used across all the management plans is for an Environmental Clerk of Works (EnvCoW) who would be supported by various specialists including ecologists.</p>
1.3.2	Objectives of the LEMP	<i>To ensure all reasonable precautions are taken by National Grid and their contractors to safeguard protected species. This Strategy also acts as the basis for a Species Protection</i>	<p>The Applicant does not see the need for this specific bullet to be included in the purpose of the LEMP as this is in relation to compliance with legislation and the licences agreed with Natural</p>

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		<i>Plan. A final detailed scheme of protection and mitigation measures for any European protected species (EPS) shown to be present, prior to construction, will be agreed with the relevant authorities under Requirement 33 of the draft DCO.</i>	England. Section 7.4 of the LEMP [REP3-034] (Document 7.8 (C)) sets out the measures in relation to protected species.
1.3.2	Objectives of the LEMP	<i>The LEMPs will also form the basis of a process of ongoing dialogue/forum with Local Authorities leading up to and during construction to ensure that Local Authorities are kept informed and satisfied of the implementation of the Outline Landscape and Ecological Management Plan (and the plans/schemes of which it forms the basis) and in order that they can also keep communities informed.</i>	The Applicant is committed to continuing engagement with the Councils which will be in the form of the regular Host Authority meetings currently held on the project. The Applicant would also be undertaking communications with local residents as described in Section 3.4 of the CEMP (Document 7.5 (C)) [REP6-021] .
1.3.2	Objectives of the LEMP	Provide details of the vegetation which will be provided as part of the embedded measures, reinstatement or additional mitigation proposals	The Applicant is unclear why the Councils are suggesting deleting this sentence, as the Applicant considered this a key function of the LEMP [REP3-034] (Document 7.8 (C)) .
1.3.2	Objectives of the LEMP	<i>An Ecological Clerk of Works (ECoW) and/or Arboricultural Clerk of Works (ACoW) will be present on site during construction.</i>	It would be completely disproportionate to the nature of the effects (and not economic and efficient) to have an ECoW and ACoW on site for the duration of construction. Especially given that the works lie typically within arable fields with limited ecological or arboricultural value. The LEMP [REP3-034] (Document 7.8 (C)) already includes many references to where an ecologist and / or arboriculturalist would advise the EnvCoW on relevant matters. However, the Applicant will add has added clarity about the roles into the LEMP at Deadline 7 to make clear that specialists would be available to advise on landscape and ecological matters as required.
1.3.2	Objectives of the LEMP	<i>If protected species or trees and hedges specified to be retained, are unexpectedly found or damaged during construction, the following action will take place:</i> <ul style="list-style-type: none"> • Works will cease immediately; • The ECoW and or ACoW and Construction Manager will be informed; • The relevant area would be demarcated and access will be restricted if necessary; • A way forward will be established and agreed and if necessary licences and authorisations will be sought; and • Works will restart once the EcoW and or ACoW, Natural England and the relevant planning authority are satisfied with the works proposed. 	The Applicant uses competent framework contractors to deliver its project, who understand what is required to comply with environmental legislation. However, the Applicant will add has added a reference to Section 7.4 of the LEMP at Deadline 7 to explain that advice would be sought from an ecologist if protected species are found on site during construction and that this could involve seeking necessary licences if pertaining to protected species.
1.3.2	Objectives of the LEMP	<i>National Grid will work with the relevant local authority to ensure appropriate resourcing is in place to monitor compliance with the provisions of the Outline Landscape and Ecological Management Plan, and the plans and schemes of which it forms the basis.</i>	The Applicant considers that it is its role, alongside its Main Works Contractor, to deliver the project in compliance with the management plans otherwise it would be in breach of its DCO. Paragraph 10.2.2 of the LEMP [REP3-034] (Document 7.8 (C)) states that 'Regular site checks will be carried out to monitor compliance with the LEMP.' In addition, the Applicant will update has included Section 10.5 in the LEMP at Deadline 7 with the equivalent text from Section 15.3 of the CEMP (Document 7.5 (C)) [REP6-021] which sets out the process for dealing with non-compliance of the management plans. This notes that where there is non-compliance, that it would be reported and investigated, and the appropriate enforcing authority will be contacted and informed.
1.3.3	Environmental commitments	The project as submitted with the application for development consent include environmental commitments under the following categories... <ul style="list-style-type: none"> • Compensation?? 	Compensation for habitats lost during construction is included under the header of mitigation. Therefore, the Applicant does not consider there to be a need to add an additional bullet for compensation.
1.4	Environmental gain	Comment: 'BNG and ENG conflated'	The Applicant is unsure what the Councils mean in relation to this comment or what they would like addressed in the LEMP. The Applicant has submitted the BNG proposals in the Environmental Gain Report [APP-176]. The BNG proposals are not set out in the LEMP, as it is anticipated that site specific management plans would be developed for the environmental areas during the detailed design stage of the project (as per paragraph 7.2.1 of the Environmental Gain Report [APP-176]).

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1.5	Table 1.1 (Landscape and Ecological Reinstatement)	Comment: 'References reinstatement works only, not mitigation and compensation. Expand Chapter 8 to include mitigation and compensation.'	This is an error. The title of the chapter was updated at Deadline 3 [REP3-034] but was not carried through to Table 1.1. This will be has been amended in the LEMP (Document 7.8 (C)) at Deadline 7.
1.5	Table 1.1 (Landscape and Ecological Reinstatement)	Comment: 'Expand Chapter 9 to include long-term management.'	The Applicant does not consider the change to the title necessary, as long term management would only apply in certain areas and the heading of 'aftercare' is generic.
1.5	Table 1.1 (Appendix B)	Comment: 'Need separate reinstatement plan, mitigation plan and compensation plan'. Comment: 'Clarify through colour coding on one plan'.	The Applicant disagrees with disaggregating LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] (Document 7.8.2 (C)) into separate plans for the planting plans for reinstatement, mitigation and compensation. This seems to contradict the comment above and below to have all ecological mitigation considerations in one place. The different types of planting are shown on Figure 16.1 in ES Figures [APP-155] for clarity for the assessment. The Applicant does not consider there to be a need to add further colour coding to LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] (Document 7.8.2 (C)), the purpose of which is to inform the contractor about what planting is required where. Differentiation between the types of planting is considered unnecessary for this purpose.
2.1	Environmental considerations	As explained in Chapter 1, the project incorporates environmental considerations through measures embedded in the design, good practice (general measures and topic-specific) measures and mitigation measures identified in the ES (application document 6.2). For ease of reference these have been assigned a reference number: • <i>Compensation measures?</i>	Figure 16.1 in ES Figures [APP-155] explains the planting that is required for biodiversity compensation. This has been considered as part of the overall mitigation identified on the project. Introducing a different term in the management plans would not align with the ES and would be confusing to readers linking the two together.
2.5	Table 2.1 (UK Habitat Classification Survey)	Minor correction UK Habitats Classification Survey.	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text.
2.5.6	Pre-construction surveys	Addition: The pre-construction survey information will inform the updated versions of Appendices A and B of the <i>final</i> LEMP which will be provided to the relevant planning authorities in accordance with Requirement 8 of the draft DCO (application document 3.1) which states:	As noted above, the Applicant does not consider there to be a need for a later discharge version of the LEMP.
2.5.6	Pre-construction surveys	Comment: 'this caveat weakens the requirement' (1) 'Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a plan showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage has been submitted to and approved by the relevant planning authority	No change is proposed to the LEMP, as this is the wording from the Requirement 8 of the draft DCO (Document 3.1 (F)), [REP6-003], which is based on standard wording used in DCO drafting. Paragraph 4.3.1 to 4.3.4 and also 4.3.14 to 4.3.16 of the Explanatory Memorandum [REP6-005] explains the purpose and effect of the 'unless otherwise agreed' wording. For example, there may be stages of the project, where no vegetation removal is necessary, and therefore agreement would be sought from the local planning authority that no vegetation plan is necessary for that stage.
3.2	Table 3.1	Addition: These will have the relevant experience to supervise the relevant aspects of the works (<i>suitably qualified persons</i>), which might include an arboriculturist, land contamination specialist, soil specialist, ecologist, archaeologist <i>and landscape architect</i> .	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text.
4.3	Table 4.1	RNRs	No change is proposed to the LEMP, as the general language style used throughout the application documents is to not pluralise acronyms.
5.1.2	Statutory landscape designations	Amendment: The statutory landscape designations relevant to the LEMP and located within or close to the Order Limits are as follows: • Dedham Vale AONB National Landscape	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text.
5.1.2	Special Landscape Areas (SLA)	Comments: "Not in new Babergh Mid Suffolk Plan? 'BMSDC adopted Joint Local Plan (Section 1) supersedes policies of the individual Local Plans'.	The Applicant notes that the new local plan was adopted on 20 November 2023, however for consistency and as the ES was based on the old plan as that was current at the time of writing, the references to SLA are retained within the LEMP [REP3-034] (Document 7.8 (C)) although a note will be has been added that paragraph 5.1.3 of the LEMP at Deadline 7 to state that these are no longer designated.

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5.2 and after 5.2.2	Landscape character areas	Comment: "Needs summary of main landscape character areas crossed" <i>The landscape character area that the project crosses are...</i>	The LEMP will be has been amended at Deadline 7 (Document 7.8 (C)) to include a list of the LCA crossed by the Order Limits and will also include a cross reference to ES Appendix 6.3: Assessment of Effects on Landscape Character [APP-100] where these are described in more detail.
6.1.3	General approach	In accordance with good practice measure GG24, where working areas will be are fenced, with Heras-type fencing, unless otherwise agreed with the relevant local authority. the type of fencing installed will take into consideration the level of security required in relation to the surrounding land and public access, rural or urban environment and arable or stock farming. For some locations the fence used may also <i>need</i> to serve to provide acoustic and visual screening of the work sites and reduce the potential for disturbance of users in the surrounding areas. Fencing will be regularly inspected and maintained and removed as part of the demobilisation unless otherwise agreed with the relevant landowner and <i>relevant local authority</i> to meet ecological objectives. The EnvCoW ECoW and arboriculturalist will contribute to discussions on appropriate signage and/or fencing to protect environmentally sensitive features, <i>which will be agreed with the relevant local authority.</i>	The Applicant does not consider it to be appropriate to fence the entire Order Limits with Heras fencing. GG24 in the CoCP [REP3-026] is worded so that the measure is dependent on the risk. The Applicant also does not consider there to be any need to involve the Councils in how it chooses to secure its working area. The Applicant delivers high voltage electricity line projects all across the county, many of these are undertaken using permitted development rights and is used to securing the boundary of its sites. The Applicant changed the reference from ECoW to EnvCoW at the Councils request on the draft LEMP and is not proposing to change it back again. However, the Applicant will add has added further clarification to the LEMP at Deadline 7 (Document 7.8 (C)) regarding roles and the need to draw on suitably qualified specialists during construction.
6.2.1	Working near trees - land access	Comment: 'Where (geographically) and how big (numbers of trees, lengths of tree lines, areas of woodlands) are the gaps in the surveys?'	The vegetation affected is clearly shown on the plans in LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183];(Document 7.8.1 (B)). The Applicant does not see any need to provide further details on where these are located and areas, when it is shown visually on the plans. This reference to gaps in surveys was in relation to the lack of arboricultural survey along the temporary access off the A131, which has since been completed in August 2023 and submitted into Examination at Deadline 1 (see Arboricultural Impact Assessment (AIA) [REP1-012]). Therefore, the line will be has been updated in the LEMP at Deadline 7 (Document 7.8 (C)) to remove reference to 'where land access was granted'.
After 6.2.1	Working near trees	<i>A pre-construction walkover survey will be undertaken by the Arboriculturist, Ecological Clerk of Works (ECoW) and an engineer to assist in micrositing the works to minimise tree loss.</i>	Pre-construction surveys are noted in paragraph 2.5.4 of the LEMP [REP3-034];(Document 7.8 (C)). However, the LEMP will be has been updated at Deadline 7 to include reference to a pre-construction walkover of key areas between the EnvCoW EnvCoW, arboriculturalist, ecologist and engineer to assist in micrositing the construction works to minimise tree loss and avoid any other sensitive features.
After 6.2.1	Working near trees	<i>Any additional veteran trees present within the Development Area would be identified during this survey as well as any tree with bat roost potential. The surveys and assessments would be undertaken pre-construction to provide the works contractor with detailed baseline construction information.</i>	The Applicant has already undertaken an arboricultural survey and impact assessment which has mapped the veteran trees within and adjacent to the Order Limits [REP1-011]. The proposed measures are included with the LEMP (see Section 6.3), which will be has been updated at Deadline 7 (Document 7.8 (C)) to include the new commitment made at Deadline 5 regarding veteran tree T378 (EM-G13 in the REAC (Document 7.5.2 (D)); [REP6-023]. Trees with bat roost potential are identified in ES Appendix 7.7: Bat Survey Report [APP-117]. A draft bat licence has been included in ES Appendix 7.7 Annex A: Bat Draft Licence [APP-118]. Natural England has provided a Letter of No Impediment (with caveats). A final draft licence will be submitted to Natural England should development consent be granted. As stated in paragraph 1.3.7 of the LEMP [REP3-034];(Document 7.8 (C)), the LEMP does not duplicate the measures set out within the relevant EPS Licences. Paragraph 2.5.4 of the LEMP [REP3-034];(Document 7.8 (C)) notes that the pre-construction surveys will check that the habitats on site are the same as in 2021/22. Paragraph 2.5.5 states that 'National Grid does not anticipate that information gathered during the preconstruction surveys would affect the commitments and methods of implementation set out within the LEMP. However, if the surveys identify new or different features, then these would be reviewed in accordance with the change process set out in Section 10.56.'
After 6.2.1	Working near trees	<i>The surveys would show actual position of trees and hedges, their condition and value and indicate the extent of root protection zones.</i>	The location of trees and hedgerow are shown on the plans in LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183];(Document 7.8.1 (B)). Their condition, value and extent of the root protection areas are recorded in the baseline documents that will be provided to the contractor namely the:

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			<ul style="list-style-type: none"> AIA [REP1-012]. ES Appendix 7.5: Important Hedgerows Assessment [APP-115]. <p>The Applicant does not see any need to provide further details on where these are located and areas, when it is shown visually on the plans and described in the supporting documentation.</p>
After 6.2.1	Working near trees	<p>All features of bat roost potential in accordance with 4th Ed Bat survey Guidelines (Collins ed 2023). This survey can be conducted at any time of year.</p>	<p>No change is proposed to the LEMP, as this is part of a separate statutory process, as noted in paragraph 1.3.7 of the LEMP [REP3-034](Document 7.8 (C)), which states 'The LEMP does not duplicate the measures set out within the relevant EPS Licences or actions required to comply with any permits or licences applied for on the project.' A draft bat licence has been included in ES Appendix 7.7 Annex A: Bat Draft Licence [APP-118]. Natural England has provided a Letter of No Impediment (with caveats). A final draft licence will be submitted to Natural England should development consent be granted. This would be undertaken in accordance with the latest guidance (currently 4th Edition Bat Survey Guidelines (Collins, 2023)).</p>
After 6.2.1	Working near trees	<p>The Arboriculturist would define specific mitigation measures to reduce the number of trees to be removed and to protect trees situated in or adjacent to the working width. The Arboriculturist will produce:</p> <ul style="list-style-type: none"> Drawings showing typical trench sections and some of the situations where micrositing of the trenches and running track can avoid trees including canopy and roots. Arboricultural Implications Assessments (AIA). Arboricultural Method Statements (AMS) Tree Protection Plans (TPP). Mitigation Strategy, if required, for any loss of veteran trees or trees with veteran characteristics in consultation with the ecologist and landscape architect. <p>These will be produced for the working corridor to meet the British Standard (BS) 5837:2012 or its updates. These will be issued to, and agreed with the relevant local authorities.</p>	<p>Good practice measure LV02 in the CoCP [REP3-026] commits the Applicant to complying with BS 5837:2012 and this is also reiterated in the LEMP, for example at paragraph 6.2.3. The AIA has already been submitted into Examination [REP1-012]. The Applicant does not consider there to be a need to submit drawings on trench sections, AMS or TPP on this Nationally Significant Infrastructure Project (NSIP), as the Applicant regularly undertakes similar activities on other construction projects.</p> <p>The mitigation for the veteran tree (T378) is included in EM-G13 in the REAC (Document 7.5.2 (D))[REP6-023] (secured through Requirement 4 of the draft DCO (Document 3.1 (F))[REP6-003] and has been agreed through discussions with BMSDC.</p>
After 6.2.1	Working near trees	<p>The method statements (AMS) will detail the tree and hedge protection required at the CSE compounds and substations and at each hedge crossing along the works corridor, such as fencing or ground protection. This information will assist the contractor with the Arboriculturist to micro-site the trenches and manage the storage of materials and movement of vehicles to provide optimum embedded mitigation against tree and hedge loss or damage.</p>	<p>Good practice measure LV02 in the CoCP [REP3-026] commits the Applicant to complying with BS 5837:2012 and this is also reiterated in the LEMP [REP3-034](Document 7.8 (C)), for example at paragraph 6.2.3. This requires AMS to be produced, which will be approved by the arboriculturalist.</p>
6.2.2	Working near trees	<p>Comments: 'Compaction levels may increase through more frequent and heavier construction traffic. "Agreed. All proposed access routes should be protected whether already compacted or not.</p> <p>Trees that are alongside existing tracks, hard surfaces or heavily compacted ground (such as unmetalled internal agricultural tracks) are considered to have adapted to the presence of that rooting constraint.</p>	<p>This paragraph was originally added to the LEMP to note that in some situations the tree roots may already have been affected such as along roads. However, the Applicant will addhas added clarification to the LEMP at Deadline 7 (Document 7.8 (C)) to say that an arboriculturalist would advise on suitable measures based on the environment and the size and numbers of construction vehicles proposed along the route.</p>
6.2.3	Working near trees	<p>Works to trees and the agreement of relevant protection measures will be undertaken under the supervision of an aArboriculturist and/or the EnvCoW.</p>	<p>No change is proposed to the LEMP, as the Applicant has not been capitalising the specialist roles in any of the management plans. The Applicant maintains that not all tree protection measures need to be undertaken under the supervision of an arboriculturalist. However, an arboriculturalist would advise on what is required during the pre-construction surveys and the EnvCoW would be responsible for monitoring the implementation of the LEMP measures.</p>
6.2.4	Land drains	<p>The location of pre- and post-construction land drains would also be adjusted to avoid or minimise damage to tree roots.</p>	<p>This change has been accepted but the text has been added to the CEMP at Deadline 6 (Document 7.5 (C))[REP6-021] which sets out the details on land drainage – see paragraph 9.3.7</p>

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
			of the CEMP (Document 7.5 (C)) where the text now reads 'land drains will be adjusted to avoid or minimise damage to tree roots, where practicable'.
6.2.5	BS 5387	6.2.5 The type of barriers will be provided dependent on the level of risk posed to the RPA and to suit the location in accordance with clause 6.2.2.3 of BS 5387:2012, as agreed with the arboriculturalist on site. For example, this may be post and rope, or netlon-type fencing in low-risk areas, plastic style pedestrian barriers in medium risk areas or, in high-risk areas, welded mesh panels on rubber feet with stabiliser struts, commonly known as Heras-type fencing.	The Applicant disagrees with the removal of this paragraph as this is based on BS 5387:2012.
6.2.7	BS 5387	<p>Unless otherwise agreed with the relevant local authority, Tree Protection Fencing types will include:</p> <ul style="list-style-type: none"> Level 1 Protection: This will be used in areas with a low risk to trees, for example marking the RPA of trees lying outside of the working area. This may include orange netting on steel pins (or similar) to mark out the extent of the RPA for trees beyond the working area. Level 2 Protection: This will be used to reduce the risk of construction encroachment for example trees at the edge of the working area. This may include rigid pedestrian barriers. Level 3 Protection: This will be used to protect important trees within areas of high construction activity. It could include measures such as braced consist of Heras-type panels with signage or solid hoarding in areas where it provides a combined function of protecting trees and providing security and screening. 	The Applicant disagrees with the removal of this paragraph as this is based on BS 5387:2012. Heras-style fencing is unsuitable on long linear electrical infrastructure projects such as the Bramford to Twinstead Reinforcement. The fencing is <u>unnecessary</u> , costly, time consuming to install and is over designed for the risk that would occur in many locations across the project. BS 5387:2012 does not say that Heras-style fencing has to be used to mitigate the risk.
6.2.8	BS 5387	It is assumed that physical barriers will not be provided where retained vegetation is in a location where there is a very low risk of accidental damage being caused, for example at the top of a steep cutting where the cutting itself provides protection.	The Applicant disagrees with the removal of this paragraph as this is based on BS 5387:2012.
6.2.9	BS 5387	As well as delineating the site, the working area fencing (where required) will serve to protect the trees that lie outside of the working area.	No change is proposed to the LEMP as the 'where required' is included to cover locations where the Order Limits may not be fenced, and the level of risk does not dictate its need. For example, in between pylons where the conductors are to be pulled but otherwise there would be limited construction activities.
6.2.10	BS 5387	In accordance with good practice and to avoid ground compaction, as referenced in clause 8.4 of BS 5387:2012, no materials (including fencing material prior to installation), plant or equipment will be stored in an RPA at any time. This will be briefed to the construction workforce working in or adjacent to an RPA, and be monitored by, the EnvCoW Arboriculturist. In addition, construction vehicles and construction plant will not be allowed to idle or be parked in access the RPA. Where exclusion is not practical access is required in either of these instances, alternative appropriate ground protection will be used following discussion with the recommendations of the arboriculturalist Arboriculturist.	The Applicant will update has updated this paragraph in the LEMP at Deadline 7 <u>(Document 7.8 (C))</u> to reflect the Councils' proposed text, other than to note that the EnvCoW would typically be the person briefing and monitoring implementation of the LEMP on site.
6.2.12	Deadwood habitat	In addition, and in accordance with good practice measure B08, decaying and dead wood within the Order Limits will be retained and protected during construction, subject to landowner agreement, to provide an important habitat for terrestrial invertebrates.	No change is proposed to the LEMP. The Applicant considers that this should be with landowner agreement, for example where this would not conflict with the operation of the land. The Applicant considers such measures as providing an optional benefit in relation to the project and should not be enforced on landowners without their agreement.
6.2.13	Root protection areas	It will not always be practical to keep construction vehicles outside of the RPA in all instances. In some cases, temporary construction access may be required within some RPA, as identified in clause 6.2.3.1 of BS 5387:2012.	No change is proposed to the LEMP. The Applicant considers that the first sentence is linked to the following one.
6.2.23	Tree works	Where branches overhang the working area and / or access routes, these may require trimming back or pruning to avoid further damage for example from passing construction vehicles. All tree works will be carried out by a specialist arboricultural contractor to avoid damage to the health of the tree under the supervision of the Arboriculturist.	The Applicant will update has updated the LEMP at Deadline 7 <u>(Document 7.8 (C))</u> in response to the Councils comments to add 'under the advice of the arboriculturalist'. The Applicant maintains that not all tree works require supervision by an arboriculturalist, as this would be costly and could

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
			delay the programme. However, an arboriculturalist would advise on what is required during the pre-construction surveys.
Following 6.2.23	Working in woodland	<p>Tree Works near and within Woodlands</p> <p><i>During construction</i></p> <p><i>The working width will be reduced to XXm within woodlands by storing soils from the woodland areas within the working width of adjacent sections of lower value habitat (on the same landownership).</i></p> <p><i>Soil excavated from within the woodland areas will be stored separately to that removed from either side of the woodland. This will protect any seeds which may be present within the ancient woodland soil. Soil will be stored in a fenced-off area; highlighting its different origin to soil excavated outside of the woodland and preventing mixing of the two.</i></p> <p><i>Where this would unacceptably restrict the working width or cannot be achieved due to adjacent hedgerows, the maximum area possible will be fenced and measures taken to mitigate the impacts of working beneath the canopy of the trees such as bog matting and sand padding to spread the weight of machinery passing over the root area would be used where practicable.</i></p>	In refining the Order Limits, the Applicant has already sought to limit the working width as much as it can at woodlands, as explained in ES Chapter 4: Project Description [APP-072]. There is very limited soil stripping required in woodland, as shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-483];(Document 7.8.1 (B)), and in many cases the trees would be coppiced (rather than removed) to allow works to take place. However, the Applicant will consider adding some additional has added text into Section 7.2 of the LEMP at Deadline 7 (Document 7.8 (C)) to address this point.
Following 6.2.23	Working in woodland	<p><i>Where possible, removal of vegetation will be timed to avoid the bird breeding season (March to August inclusive). Where tree or scrub removal during the breeding season is unavoidable, a check by the ECoW would be undertaken immediately prior to habitat removal to confirm that there are no occupied nests. Should any occupied nests be identified, an appropriate buffer zone (determined on the basis of the species concerned and the location of the nest in the context of the surrounding vegetation, but no less than 5m) would be implemented until the chicks have fledged.</i></p>	No change is proposed to the LEMP as paragraph 2.2.7 and 7.1.2 of the LEMP [REP3-034](Document 7.8 (C)) already refer to good practice measure B02 which relates to bird breeding season. The Applicant does not consider it necessary to duplicate this text in 6.2.23.
Following 6.2.23	Working in woodland	<p><i>For trees in which bat roosts have been identified or which are identified as having bat roost potential, the measures set out for bat mitigation will be followed. No materials or vehicles, whether temporary or otherwise, shall be stored under crown spreads of trees.</i></p> <p>Comments on the above additional text re. bat mitigation: "Has this been done? Can it be cross referenced? Needs to reference CoCP and EPS Report".</p>	No change is proposed to the LEMP, as stated in paragraph 1.3.7 of the LEMP, the LEMP does not duplicate the measures set out within the relevant EPS Licences or actions required to comply with any permits or licences applied for on the project. Paragraph 2.6.2 of the LEMP states that the application for development consent includes the draft EPS licences for bats and dormouse and the draft badger licence. The final licences will be produced and submitted to Natural England in accordance with good practice measures B01 in the CoCP [REP3-026]. The final licences will contain the mitigation measures required to comply with legislation. All applicable works will be undertaken in accordance with the relevant requirements and conditions set out in those licences
6.3	Headings	Heading for 'Working near designated trees' moved to above paragraph 8.4.5.	The Applicant considers the heading to be appropriately located in the Chapter 6 of the LEMP (Document 7.8 (C)) covering Vegetation Retention.
6.3.5 Table 6.1 Table 6.1 A3 A3 6.3.7 Table 6.2	Standing advice for ancient woodland and veteran trees	<p>The project has considered will follow the Forestry Commission and Natural England Standing Advice (2022) which states that 'For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage...'. Comments: 'These provisions are insufficient. Measure A1 should apply, unless otherwise agreed with the relevant local authority. Temporary access roads should not be included. That should be A2.' Agreed but delete ref to 'unless otherwise agreed etc.' Comment: "All these exceptions require a detailed and location specific arboricultural method statement which needs to be agreed with the relevant local authority prior to works in this area starting". These will be recorded in a method statement <i>which will be agreed.</i> The project has considered will follow the Standing Advice on protecting veteran trees from development which states 'A buffer zone around...' Comment: "As above. Revision required. Areas where measures are not practicable will need to be identified and agreed post consent in final LEMP."</p>	<p>The Applicant has sought to avoid areas of ancient and potential ancient woodland through the routing of the project, as outlined in ES Chapter 3: Alternatives Considered [APP-071]. There are four locations along the Order Limits where a 15m buffer cannot be maintained, including at Hintlesham Woods SSSI where the Applicant is proposing to use the existing overhead alignment through the woods. These locations and the works proposed are set out in the Technical Note on Ancient and Potential Woodland [REP3-046]. In these specific locations, Table 6.1 of the LEMP [REP3-034](Document 7.8 (C)) sets out the measures that would be undertaken. Similarly, there is only one veteran tree that would be lost on the project (T378), all others will be retained with a suitable buffer based on the results of the arboricultural survey, as outlined in Table 6.2 of the LEMP [REP3-034];(Document 7.8 (C)). The approach to both ancient woodland and veteran trees uses the same measures that were used on the Southampton to London Pipeline DCO (EN070005), which included the Approach to Ancient Woodland and Veteran Trees as Appendix C in the LEMP on that project [REP6-028]. The Applicant considers these methods to be suitable for protecting the trees from harm during the works necessary to construct this NSIP. As these measures are already detailed in the LEMP [REP3-034](Document 7.8 (C)) and the LEMP already refers to AMS being agreed with the arboriculturalist, the Applicant does not consider there to be a need to agree further measures with the Councils post-consent on this matter.</p>

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
6.4.2	Hedgerows	<p>Hedgerows that do not require removal during the works would have not been identified on the detailed Vegetation Retention and Removal Plans submitted and approved as part of the detailed LEMPS will be appropriately protected during construction. This may will include suitable fencing to and provide a buffer which protects the rootzone from trafficking.</p> <p><i>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 will be followed:</i></p> <ol style="list-style-type: none"> The topsoil (including any bank) from beneath the hedgerow will be stripped and stored separately. Vegetation and topsoil from any associated ditch will be stripped and stored separately. Soil storage areas will be clearly signed and demarcated to prevent any mixing with other soils. 	<p>No change is proposed to the LEMP, as hedgerows that are to be retained and removed are shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-133]. The measures for protection of hedgerows are detailed in Section 6.4 of the LEMP [REP3-034]-(Document 7.8 (C)). However, the Applicant will updatehas updated the LEMP at Deadline 7 with the following measures with regards to all hedgerows on the project to reflect the Councils' proposed text:</p> <ol style="list-style-type: none"> The topsoil (including any bank) from beneath the hedgerow will be stripped and stored separately. Vegetation and topsoil from any associated ditch will be stripped and stored separately. Soil storage areas will be clearly signed and demarcated to prevent any mixing with other soils.
6.4.2	Important hedgerows	<p>The mitigation measures for botanically important hedgerows, or those qualifying as important under the Hedgerow Regulations 1997 will be the same as above with the exception that, where viable, the following measures will be considered, discussed, and agreed with the relevant local authority:</p> <ol style="list-style-type: none"> 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 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 strimmed to ground level. Where possible, geotextile will be used for the running track to reduce the amount of topsoil being stripped (this will aid reinstatement of vegetation). 	<p>The Applicant notes that the majority of hedgerows on the project are botanically important and/or qualify as important under the Hedgerow Regulations 1997, as set out in ES Appendix 7.5: Important Hedgerows Assessment [APP-115]. The Applicant has already minimisedreduced the construction width and is proposing to coppice and use geotextile in locations where there is no underground cable installation or a requirement for a stone access route due to the size of vehicles. The vegetation assumptions are described further in ES Chapter 4: Project Description [APP-072] and are also shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183]-(Document 7.8.1 (B)).</p> <p>The Applicant also notes that it would not be practicable to temporarily remove, store, maintain and replace hedgerow plants, which in some locations could be up to four years, along the cable route and temporary access routes.</p>
6.4.2	Hedgerows with protected species	<p>Where hedgerows provide habitat for protected species, specific mitigation measures are addressed under the relevant protected species title.</p> <p>Where the removal of the hedgerows is anticipated to have significant residual visual impacts, or impact on Barbaestelle bats, because one or more pass by this species has been found along a hedge, in addition to the mitigation identified in the preceding sections, these hedgerows will be reviewed and special engineering measures will be considered in order to further reduce significant residual visual impacts. Engineering measures include a change to the typical trench sections, alteration of construction methodology and machinery which would enable the open cut trenches and haul road to be micro-routed through existing narrow gaps in the otherwise dense tree or hedge lines without loss of landscape character or setting.</p>	<p>The Applicant has produced draft protected species licences for the project, including for dormouse (ES Appendix 7.8 Annex A: Dormouse Draft Licence [APP-120]) and bats (ES Appendix 7.7 Annex A: Bat Draft Licence [APP-118]) and would need to submit final licences to Natural England prior to construction. The draft licences set out the measures required in accordance with the relevant guidance and specific measures are not duplicated in the LEMP.</p>
6.4.2	Hedgerows at CSE compounds	<p>In addition, clarification will be provided regarding the potential impact on hedgerows at the entrances to CSE compounds.</p>	<p>The proposals relating to hedgerows at the entrance to the CSE compounds are shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183]-(Document 7.8.1 (B)) and LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036]-(Document 7.8.2 (C)). In addition, the Applicant has also updated Requirement 9 of the draft DCO (Document 3.1 (F))[REP6-003] at Deadline 6 to state that: 'Unless otherwise agreed with the relevant planning authority, the reinstatement planting plan submitted under sub-paragraph (1) will include a landscape plan for the cable sealing end compound where relevant for the stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.'</p>
6.4.2	Trenchless crossing of hedgerows	<p>If the pre-construction surveys and the Arboricultural Method Statement identify additional constraints at these hedgerows such that the measures outlined above will not adequately</p>	<p>It would not be practicable to use trenchless construction techniques to install the underground cables at multiple hedgerow crossings. This would be expensive (against the Applicant's duty to be economic and efficient) and would extend the construction programme. The majority of hedgerow</p>

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
		<i>minimise the impact of the development, the use of trenchless techniques will be considered.</i>	crossings are small gaps created for the temporary access route, which is required along the length of the cable sections for the delivery of cable drums , therefore trenchless techniques could not be used for this.
6.5.1	Temporary bridge	Comment against 'A temporary clear span bridge is proposed...': "Detailed design and location plan needs to be approved prior to installation." [with reference to the above comment] "Is this covered somewhere"	The Applicant does not consider the need for temporary works to be agreed with the Councils or details to be provided in the LEMP. The design of the bridge will be submitted to the Environment Agency as part of the Flood Risk Activity Permit process. Further details can be found in Table 2.1 of the CEMP (Document 7.5 (C)) [REP6-021] .
6.5.4	Watercourses	Prior to carrying out any works to watercourses, a preconstruction check will be undertaken by a SQE to check for the presence of otter, water vole and any INNS.	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text.
6.8.2	Historic earthworks	<p>Comment against 'The project includes the removal of historic earthworks and hedgerows for temporary bellmouths or access routes': "I am doubtful as to the success of this approach. Historic environment comment also required".</p> <p>Comment against 'Any historic features associated with the lane will be reinstated at the end of construction to the pre-work condition, including the replanting of hedgerows and reinstatement of historic earthworks': "Are these really capable of restoration?"</p> <p>Comment: "Considerable number impacted"</p>	<p>The only historic earthworks that have been identified within the Order Limits that would be affected by the project are associated with the Protected Lane (Essex) and Historic Lane (Suffolk). Details regarding the proposed works can be found in Table 6.5 of the LEMP [REP3-034] (Document 7.8 (C)).</p> <p>Good practice measure H05 in the CoCP [REP3-026] states that 'A topographic survey will be undertaken in advance of construction of each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the lane, including banks and ditches. During construction, the contractor will seek to limit the working area to the narrowest section of the lane that is practicable for the specific works. Any historic features associated with the lane will be reinstated at the end of construction to the pre-work condition, including the replanting of hedgerows and reinstatement of historic earthworks.'</p> <p>The impact assessment is presented in ES Chapter 8: Historic Environment [APP-076] concludes in paragraph 8.6.19 that with this good practice measure in place (H05), the direct effects to Protected Lanes and historic lanes would be a short term minor adverse effect, which is not significant.</p>
7.1.1	Vegetation loss	<p><i>Based on the surveys carried out to date, the following vegetation losses are expected:</i></p> <ul style="list-style-type: none"> • XXX Nos. trees (xx Nos, Veteran, xx Nos Category A, etc.) • XXX m hedgerow (of which XXm are important hedgerows under the 1997 Hedgerow Regulations); losses for visibility splays are included in these figures. • XXXXm2 woodland, with xxxxm2 being ancient or semi-ancient woodland. • XXXXm2 grassland • Xxxxm2 Other habitats. <p><i>These figures will be revised, once pre-construction surveys have been carried out, will be communicated to the relevant Local Authorities and will inform mitigation strategies, the Biodiversity Metric calculations and the detailed LEMPs for each section of the scheme.</i></p>	<p>The assessment presented in the ES considers the overall value associated with hedgerows, trees and other habitats that would be affected within the Order Limits. As shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183] (Document 7.8.1 (B)), very little vegetation would be affected during construction, and as per LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] (Document 7.8.2 (C)), almost all of this is a temporary loss with vegetation being restated at the end of construction.</p> <p>The Applicant does not consider it necessary to report the temporary vegetation losses in the LEMP. Defra Metric 3.1 has been used to demonstrate reinstatement of the baseline conditions and the Environmental Gain Report [APP-176] sets out the enhancements proposed to deliver the 10% net gain. The Defra Metric (alongside any updates to LEMP Appendix A and B as per Requirement 9 and 10 of the draft DCO (Document 3.1 (F)) [REP6-003]) would be updated prior to construction, once the contractor has identified the final vegetation that would be affected. Requirement 13 of the draft DCO (Document 3.1 (F)) [REP6-003] requires the Applicant to provide written evidence (in the form of the outputs of the biodiversity metric) demonstrating how at least 10% in biodiversity net gain is to be delivered as part of the authorised development.</p>
7.2.5	Tree works	Comment: 'Landscaping Contractor isn't a thing'. All tree works will be carried out by a specialist landscaping or arboricultural contractor	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text.
7.2.7 subsection heading	Heading reference	Other Ancient Woodland and Woodland Priority Habitat	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text.
7.3.1	Nesting birds	<i>Any required hedgerow removal will be compliant with the Wildlife and Countryside Act 1981 which restricts the timings of this in relation to nesting birds.</i>	No change is proposed to the LEMP as the existing commitment (good practice measure B02) is compliant with the Wildlife and Countryside Act 1981.

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
7.3.4	Cable swathe	Comment in relation to 'Where the 400kV underground cable crosses existing hedgerows, a gap of up to 60m will be created in the hedgerow and the roots would be grubbed out'. "Is this the narrowest working width?"	No change is proposed to the LEMP, as this is the narrowest width for the underground cable sections (reduced from the standard 80m width) given the splay of the cables, as shown on Design and Layout Plans Cable Working Cross Section [APP-027].
7.4.4	Terminology	Secondly, vegetation will be cleared down to ground level under the supervision of an ECoW ecologist.	The Applicant considers that an ecologist is the suitably qualified person to supervise this task. However, the Applicant will add further clarification regarding roles and the need to draw on suitably qualified specialists during construction.
7.4.6	Soft felling	Where high potential roosting features are present, the project will soft fell these <i>under the supervision of an ECoW</i>	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text with the supervision of an ecologist. The measures required relating to the felling of high potential roosting bat features would be agreed through the final Bat Licence agreed with Natural England. The Applicant has produced a draft Bat Licence as part of the application for development consent and Natural England has provided a Letter of No Impediment.
7.4.6	Bat roosts	Comment in relation to 'Where it is not practicable to attach limbs with potential roost features from trees with high bat roosting potential suitability to retained trees within the Order Limits, then additional bat boxes will be provided to avoid loss of these roosting opportunities.' This is what I asked for.	The Applicant welcomes this comment.
8.1.1	Reinstatement	This section sets out the general principles for how reinstatement and mitigation planting will be undertaken on the project. It includes the reinstatement of hard landscaping features such as walls and fences. It also covers soft landscaping, including the reinstatement of vegetation that has been removed and reinstatement of habitat areas and also mitigation planting, for example MM09 to the north of Hintlesham Woods.	The Applicant is unsure as to why the two sections in paragraph 8.1.1 of the LEMP [REP3-034](Document 7.8 (C)) have been highlighted, as there is no accompanying comment.
8.1.2	Requirement wording	All reinstatement planting works referred to in Requirement 9 must be carried out in accordance with the relevant <i>approved</i> reinstatement planting plan for that stage of the authorised development, unless otherwise approved <i>agreed</i> by the relevant planning authority.	No change is proposed to the LEMP, as this is the wording from the Requirement 9 of the draft DCO (Document 3.1 (F));[REP6-003], which is based on standard wording used in DCO drafting.
8.1.3	Reinstatement	The general principle of reinstatement on the project is that 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 (GG07), <i>and as agreed with the relevant planning authority.</i>	No change is proposed to the LEMP, as noted on page 86 of the Schedule of Changes to the Management Plans [REP3-055], 'where practicable' has been retained as this will depend on what the pre-site conditions were and what the end land use needs to be. For example, trees cannot be planted over the underground cables and the land use within the CSE compounds and GSP substation footprint will differ from the pre-project conditions. Reinstatement planting would already have been agreed as per Requirement 10 of the draft DCO (Document 3.1 (F));[REP6-003].
8.1.4	Aftercare	In accordance with good practice measure LV03, and as stated in Requirement 10 of the draft DCO (application document 3.1), a five-year <i>aftercare and long-term management</i> periods will be established for mitigation planting and reinstatement (<i>five years for hedges, 10 years for trees and 15 years for woodlands</i>), unless a longer period has been defined through the project commitments (see paragraph 9.1.2 of the LEMP) or if otherwise agreed with the relevant planning authority.	No change is proposed to the LEMP, as this reflects the wording of good practice measure LV03 in the CoCP [REP3-026] and the wording of Requirement 10 (Document 3.1 (F));[REP6-003]. The Applicant is proposing an aftercare period that is suitable for the proposed planting. This is for the life of the asset at the locations where embedded measures are proposed (measures EM-D01, EM-F01, EM-G03, EM-G06, EM-H02 in the REAC (Document 7.5.2 (D));[REP6-023], up to 30 years for the new woodland planting (MM09) to the north of Hintlesham Woods, and five years is considered suitable elsewhere which is typically regrowth of coppiced vegetation and replanting of hedgerows.
8.2.2 (second bullet)	Planting season	Reinstatement and any new planting, including any subsequent replacement of failed planting, will be carried out in the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use. For example, tree and scrub planting will typically be undertaken between November and the end of March <i>February</i> , avoiding periods of frosts, extreme cold and waterlogged conditions.	The Applicant is not proposing to shorten the season, as March is standard in landscape contracts and the success of the planting would be dependent on the weather and climate in any given year e.g. planting could take place if it is a cold March rather than deferring to the following winter. However, at the Councils' request, a sentence will be <i>has been</i> added to the LEMP [REP3-034](Document 7.8 (C)) to explain that replacement planting should be undertaken as early <i>as practicable</i> within the <i>planting</i> season as practicable to give the best chance of success.
8.2.2 (fourth bullet)	Browsing	Tree and shrub planting areas will initially be protected to shield young trees from browsing rabbits and deer during establishment, for example using tree/shrub shelters or fencing. Protection, for example fencing will also be considered around planting in fields that are grazed by livestock.	The Applicant disagrees with this proposed removal. The shelters or fencing are examples of measures that could be used. There are other methods that can also be used to reduce the risk of browsing.

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
Before 8.4.1	Woodland soils	<i>Woodland soils will be replaced within the woodlands on completion of cable installations.</i>	The text will be <u>has been</u> amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
Before 8.4.1	Planting ratio	<i>Where compliant with landscape objectives, replanting will be on a two for one basis (two planted for every one removed) with native species, preferably of local origin.</i>	No change is proposed to the LEMP, as Defra Metric 3.1 has been used to demonstrate reinstatement of the baseline conditions (this requires the planting of more than <u>what</u> has been removed to achieve no net loss <u>depending on the habitat effected</u>) and the Environmental Gain Report [APP-176] sets out the enhancements proposed to deliver the 10% net gain. This includes hedgerow reinforcement. Therefore, the Applicant considers it to be unnecessary to also commit to a two for one ratio for replanting.
Before 8.4.1	Veteran trees	<i>The mitigation strategy, if required, for the loss of any veteran trees or trees with veteran characteristics will be implemented.</i>	The Applicant has made a commitment with regards to the mitigation strategy for the single veteran tree (T378) that would be lost on the project (EM-G13 in the REAC (Document 7.5.2 (D)) <u>[REP6-023]</u>). The text will <u>has</u> also be <u>been</u> included in the LEMP at Deadline 7 <u>(Document 7.8 (C))</u> .
Before 8.4.1	Planting over cables	<i>Where trees cannot be planted over the cables, habitat continuity will be maintained through planting of shrub species.</i>	No change is proposed to the LEMP as this is already shown in LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] <u>(Document 7.8.2 (C))</u> .
Before 8.4.1	Land drains	<i>Where possible, the location of pre- and post-construction land drains will also be adjusted to avoid or minimise damage to tree roots.</i>	This change has been accepted but the text has been added to the CEMP at Deadline 6 (Document 7.5 (C)) <u>[REP6-021]</u> which sets out the details on land drainage – see paragraph 9.3.7 of the CEMP (Document 7.5 (C)) <u>[REP6-021]</u> where the text now reads 'land drains will be adjusted to avoid or minimise damage to tree roots, where practicable'.
8.4.10	Seed collection	In areas immediately adjacent to existing woodland, the soil is already likely to contain seeds that have fallen from the adjacent trees. These seeds will be used and supplemented where necessary with seeds collected from the <i>native</i> trees within nearby woodland areas (subject to landowner permission).	The Applicant is reviewing this comment and will respond further <u>text has been amended in the LEMP</u> at Deadline 7 <u>(Document 7.8 (C))</u> to reflect the Councils' proposed text.
8.4.10	Browsing	<i>Given the likely impacts caused by deer, rabbits and hares on potential saplings, deer and rabbit proof fencing will be provided. Badger gates and raptor posts will be included within such fences.</i>	No change is proposed to the LEMP, as browsing is covered in paragraph 8.2.2 of the LEMP [REP3-034] <u>(Document 7.8 (C))</u> and the Applicant does not consider it necessary to duplicate here. The Applicant disagrees that fencing is the only solution for protection against browsing on a linear project of this nature, as the fencing will create a barrier to other wildlife.
8.4.11	Long term management	The aftercare <i>and long-term management</i> checks (see Chapter 9) will identify whether the habitat is establishing using natural regeneration methods or whether additional planting is required to achieve the habitat objectives. If further planting is required, this will use the same or other locally appropriate <i>native</i> species.	No change is proposed to the LEMP, as the Applicant does not consider it necessary to add long term management into the text.
8.4.12	Reinstatement	Addition and comment: To prepare the site, the soil will be ploughed or subsoiled to break up any compacted soil. <i>Then the stored topsoil will be replaced.</i> The site will be disced and repeatedly harrowed during the spring and summer to reduce successive flushes of weeds and to produce an even seedbed.	The text will be <u>has been</u> amended in the LEMP at Deadline 7 <u>(Document 7.8 (C))</u> to reflect the Councils' proposed text.
8.4.12	Natural regeneration	Comment: 'The detail of the method for natural regenerations will need to be agreed with suitably qualified specialists post consent in the final LEMP.'	The Applicant is reviewing this comment and will respond further at Deadline 7. <u>The text has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to include that input will be drawn on from suitably qualified specialists as required.</u>
8.5.1	Reinstatement	<i>Banks and ditches will be reformed to similar profiles as before.</i>	No change is proposed to the LEMP, as this is already covered in good practice measure GG07 in the CoCP [REP3-026], which states that ' <i>Land used temporarily will be reinstated where practicable 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.</i> '
8.5.1	Topsoil replacement	<i>Topsoil will be replaced after works in the reverse order that it was excavated to distinguish its difference from other stored topsoil.</i>	No change is proposed to the LEMP, as this is already stated in paragraph 11.3.36 of the CEMP (Document 7.5 (C)) <u>[REP6-021]</u> .
8.5.1	Reinstatement	<i>Replanting of hedgerows will take place in the first available planting season following construction.</i>	No change is proposed to the LEMP, as this is covered in Requirement 10 of the draft DCO (Document 3.1 (F)) <u>[REP6-003]</u> , which states ' <i>Unless otherwise agreed with the relevant planning</i>

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
			authority, all reinstatement planting works referred to in Requirement 9 must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use.'
8.5.1	Planting ratio	Replanting of hedgerows will aim to enhance baseline conditions i.e., through improved species diversity or replanting on a two for one basis (two planted for every one removed) where compliant with landscape objectives.	No change is proposed to the LEMP as the reinstatement proposals are already shown on the LEMP Appendix B: Reinstatement Plan [REP3-036];(Document 7.8.2 (C)) , along with LEMP Appendix C: Planting Schedules [APP-185];(Document 7.8.3 (B)) which sets out the species mixes. Defra Metric 3.1 has been used to demonstrate reinstatement of the baseline conditions (this requires the planting of more than has been removed to achieve no net loss). The Environmental Gain Report [APP-176] sets out proposals for reinforcement of existing hedgerows to provide net gain on the project.
8.5.1	Planting mix	Planting will 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 will be established on the basis of a survey in accordance with the Hedgerow Regulations, 1997. Where single species hedgerows require replanting, this opportunity to enhance the species mix to contribute to biodiversity net gain.	No change is proposed to the LEMP, as paragraph 8.2.2 of the LEMP [REP3-034];(Document 7.8 (C)) already states that trees and shrubs will be of local provenance. LEMP Appendix C: Planting Schedules [APP-185];(Document 7.8.3 (B)) set out the species mixes which have been determined based on the results of the habitat and hedgerow surveys. The Environmental Gain Report [APP-176] sets out proposals for reinforcement of existing hedgerows to provide net gain on the project. However, the Applicant will review the hedgerow survey results to see where single species hedgerows exist as SCC has requested that gaps created by the project are not planted with a diverse mix of species where this would change the character of the hedgerow. This will be reviewed as part of the updated LEMP at Deadline 7. <u>In response to feedback from SCC, which has requested that planting diverse species in a gap where a hedgerow comprises a single species could change the landscape character, the Applicant has reviewed ES Appendix 7.5: Important Hedgerows Assessment [APP-115]. This includes a small number of hedgerows which comprise of a single species (all hawthorn). The Applicant has added text to LEMP Appendix C: Planting Schedules (Document 7.8.3 (B)) at Deadline 7 to say that reinstatement planting would be undertaken in accordance with this species unless otherwise agreed with the local planning authority.</u>
8.5.1	Species mix	A schedule of species composition for reinstatement will be provided.	No change is proposed to the LEMP, as this is already provided in LEMP Appendix C: Planting Schedules [APP-185];(Document 7.8.3 (B)) .
8.5.1	Hedge planting	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 and spacing and a program of weed control and aftercare to cover a period of five years, (ten years for hedges on the CSEC and substations sites).	No change is proposed to the LEMP, as these details are already provided in the LEMP (or CEMP) as follows: <ul style="list-style-type: none"> • Soil restoration and ground preparation is contained in Chapter 11 of the CEMP (Document 7.5 (C));[REP6-021]; • Species choice, stock size and spacing can be found in LEMP Appendix C: Planting Schedules [APP-185];(Document 7.8.3 (B)); • Weed control is described in Section 9.2 of the LEMP [REP3-034];(Document 7.8 (C)); and • The aftercare is 5 years (unless stated otherwise) as per Requirement 10 of the draft DCO (Document 3.1 (F));[REP6-003].
8.6.1	Grassland	In all grassland, topsoil would be stripped, stored and replaced to retain the seed bank. Areas of improved grassland and verges disturbed by construction activities outside of the areas identified for natural regeneration, will be reinstated by seeding of an appropriate grass mix suited to the existing soil conditions and site use.	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text.
8.6.1	Neutral grassland	In neutral grassland areas, natural regeneration is preferred and no supplementary seeding would be used. For the sections where disturbance cannot be avoided (i.e. the cable trench) topsoil should be removed, stored and reinstated and the area left to recover naturally.	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text <u>with the exception that supplementary seeding may be required</u> , along with reference to <u>ES Figure 7.1.4 [APP-148] which shows</u> the locations where neutral grassland is present <u>within the Order Limits</u> .

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
9.1.1	Reinstatement	As a general principle, at the end of construction, land used temporarily will be reinstated to an appropriate condition relevant at least equivalent to its pre-construction condition and its previous use' (GG07).	No change is proposed to the LEMP, this is consistent with the wording of GG07 in the CoCP [REP3-026] and is a general principle applied across the whole project.
9.1.1	Handover	In many locations that do not require aftercare, the land will be handed back to the relevant landowner at the end of reinstatement.	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text.
9.1.2	Aftercare duration	Where vegetation including woodland, hedgerows and trees have been planted as part of the reinstatement and mitigation, these will have a five-year aftercare period (five years for hedges, ten for years for trees and fifteen years for woodlands) in accordance with good practice measure LV03 and Requirement 10(3) of the draft DCO (application document 3.1). In addition, National Grid will continue to maintain planting at the GSP substation and the CSE compounds for the life of the asset, in accordance with embedded measures EM-D01, EM-F01, EM-G03, EM-G06 and EM-H02 set out within the REAC (application document 7.5.2). National Grid will also maintain mitigation area MM09 to the north of Hintlesham Woods SSSI, for up to 30 years due to the importance of this site in meeting an objective to improve habitat connectivity between Ramsey Wood and Wolves Wood, and to enable the woodland planting to achieve the growth rates predicted and secure its long-term viability.	The Applicant is proposing an aftercare period that is suitable for the proposed planting. This is for the duration of the asset at the locations where embedded measures are proposed (measures EM-D01, EM-F01, EM-G03, EM-G06, EM-H02 in the REAC (Document 7.5.2 (D)); [REP6-023]), up to 30 years for the new woodland planting (MM09) to the north of Hintlesham Woods, and five years is considered suitable elsewhere which is typically regrowth of coppiced vegetation and replanting of hedgerows.
9.1.3	Terminology	Periodic checks will be undertaken by a suitably qualified experienced professional to check reinstatement and to replace species plants that have not taken. The landscape contractor will prepare inspection reports as part of these visits and submit a copy to the relevant Local Authority.	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text.
9.1.4	Detailed LEMP	A programme for maintenance visits and inspections will be provided within the detailed LEMP for each section of the project.	No change is proposed to the LEMP, as the Applicant does not consider a detailed LEMP to be required.
9.1.4	Aftercare	To ensure development of the planting to a satisfactory standard, there will be an agreed procedure for joint annual inspection of all planting areas by representatives of the relevant Local Authority and developers at the end of each growing season and for each year of the aftercare period (ten years for woodlands and tree planting and five years for hedge and scrub planting), following implementation. Areas found not to be thriving will be treated to such additional works as are required to rectify the situation within the next growing season.	No change is proposed to the LEMP, as the Applicant does not consider there to be a need for the Councils to attend annual inspections of all planting areas, as the Applicant regularly undertakes landscape contracts across the country for its maintenance and permitted development activities.
9.1.4	Aftercare duration	Suspension of the aftercare period for any part of the scheme may occur in the event that in the opinion of the relevant Local 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.	The Applicant is proposing an aftercare period that is suitable for the proposed planting. This is for the duration of the asset at the locations where embedded measures are proposed (measures EM-D01, EM-F01, EM-G03, EM-G06, EM-H02 in the REAC (Document 7.5.2 (D)); [REP6-023]), up to 30 years for the new woodland planting (MM09) to the north of Hintlesham Woods, and five years is considered suitable elsewhere which is typically regrowth of coppiced vegetation and replanting of hedgerows.
9.1.5	Aftercare	Prior to the end of the five-year aftercare period, a final inspection will be undertaken at which any final replacement planting required shall be communicated to the landowner and the relevant Local Authority. Following the completion of any the agreed replacement planting, a final inspection will then be held with representatives of the Local Authority as part of the completion of the aftercare, whereupon National Grid shall cease to have any further maintenance obligation.	The Applicant will remove has removed reference in the LEMP to 'five years years' before aftercare as requested by the Councils. The Applicant will has also add added to a sentence to the LEMP at Deadline 7 to notify (Document 7.8 (C)) that the Local Planning Authority will be notified when the aftercare period is complete. The Applicant does not consider there to be a need for the Local Planning Authority to be on the final inspection, as the Applicant regularly undertakes landscape contracts across the country for its maintenance and permitted development activities, however, if considered beneficial to all parties, this could be organised at the relevant time. The Applicant notes that it undertakes similar activities to that proposed on the project across its network and is used to implementing landscape contracts on its projects.
9.2.1	Inspections	The five-year aftercare includes inspections by a suitably-qualified professional for all reinstated woodland, hedgerows, tree belts and individual trees to will include:	The text will be has been amended in the LEMP at Deadline 7 (Document 7.8 (C)) to reflect the Councils' proposed text but retaining retained 'suitably' to match the language requested elsewhere in relation to 'qualified'.

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
9.2.1	Planting season	Check and record failing, dead or defective plants and replace failed planting each year, between November and end of February March, until the target stocking density is achieved;	The Applicant is not proposing to shorten the season, as March is standard in landscape contracts and the success of the planting would be dependent on the weather and climate in any given year e.g. planting could take place if it is a cold March rather than deferring to the following winter. However, at the Councils' request, a sentence will be added to explain that replacement planting should be undertaken as early within the season as practicable to give the best chance of success.
9.2.1	Herbicides	Apply herbicide to maintain weed-free plant circles around base of transplants and spot-treat undesirable species, having regard to complying with any restrictions on use of herbicides in certain locations, for example, in proximity to watercourses or other sensitive habitats. Selective hand weeding may be required where there are no suitable alternative methods;	The text will be <u>has been</u> amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
9.2.1	Mulching	Comment: "Mulching should be included as part of the establishment."	The Applicant is considering this comment and will provide feedback at Deadline 7. <u>The Applicant has added the following wording to paragraph 9.2.1 of the LEMP at Deadline 7: Check mulch level/mulch mats. Where organic mulch or mulch mats have been used for weed suppression, the depth of mulch in individual plant circles shall be inspected at least once per year during the aftercare period and restored to a depth of 75mm, mulch mats shall be inspected as part of the aftercare inspections and any mats and pegs which are not secure would be re-fixed.</u>
9.2.2	Site inspections	Inspections will also be undertaken to any areas that were coppiced during construction to check that the coppicing is re-establishing. This will confirm that these areas are regenerating as planned or will identify the need for further measures, such as additional planting where the coppicing is not leading to successful regrowth. In addition, an arboriculturalist will also be consulted to advise on whether veteranising of existing individual trees is appropriate as part of the aftercare and management. <i>A detailed programme for the above measure will be provided in the detailed LEMPs for each section of the project.</i>	The Applicant would be responsible for the site inspections as part of its aftercare and does not consider that it needs to provide a detailed programme of when these would occur.
10.1.1	Detailed LEMP	National Grid will <i>provide detailed LEMPs and Landscaping schemes for each section of the scheme and in accordance with this OLEMP. The LEMPs will</i> put in place robust procedures to inform and supervise all those working on the project including its contractor, to make sure the control measures set out in the OLEMP are adopted when undertaking the construction of works authorised by the DCO. The main responsibility for implementing these control measures will fall to the contractor.	No change is proposed to the LEMP, as the Applicant does not consider a detailed LEMP to be required.
10.2.2	Terminology	Regular site checks will be carried out to monitor compliance with the <i>respective</i> LEMP. The programme of site inspections will be managed by the Environmental Manager who will draw on appropriate suitably experienced <i>qualified</i> specialists for specific tasks. The overarching inspections are summarised below in Table 10.1. Immediate action including, if necessary 'stopping a job', will be taken should any incidents or non-conformance with the LEMP be found during inspection.	The word 'experienced' will be <u>has been</u> replaced by 'qualified' in the LEMP at Deadline 7 to reflect the Councils' proposed text and match the terminology used elsewhere.
10.3.1	Terminology	Comment: 'by a suitably qualified and licensed (where required) person': This is now consistent throughout.	Noted. This change has already been made to the LEMP [REP3-034]. <u>(Document 7.8 (C)).</u>
10.3.2	Site inspections	Site inspections will be undertaken to check whether habitats are returning to their pre-construction condition. The baseline habitat surveys will provide the evidence of the pre-construction conditions and will be used to establish site specific targets for the habitat reinstatement. The aim of the site inspections is to identify whether adaptive measures need to be taken so that these sites achieve the habitat conditions required (i.e. pre-construction quality and value). <i>A detailed programme for these site inspection will be provided in the detailed LEMPs for each section of the scheme.</i>	The Applicant would be responsible for the site inspections as part of its aftercare and does not consider that it needs to provide a detailed programme of when these would occur.
10.4.2	Detailed LEMP	The monitoring requirements, including locations and frequency of inspections, will be set out <i>in the detailed LEMPs</i> with <i>as per</i> the finalised EPS licence applications and will be	No change is proposed to the LEMP, as the Applicant does not consider a detailed LEMP to be required.

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		agreed with Natural England. Any corrective actions that may be required will be agreed with Natural England and implemented as required.	
SCC Additional Evidence relating to the Landscape and Ecological Management Plan [REP6-054]			
1.1	<u>Consistency between documents</u>	<u>The information provided on the Vegetation Retention and Removal Plan, Vegetation Reinstatement Plan, and Arboricultural Impact Assessment Tree Constraints Plan is not consistent, and therefore not reliable, between the various documents.</u>	<u>The Applicant has responded to the specific points below.</u>
1.1.a	<u>Hedgerows</u>	<u>H-AB-054 (shown on Vegetation Reinstatement Plan, Sheet 01 and Sheet 02, label on Sheet 01) is listed in the Important Hedgerows Assessment as Important (number of woody species unknown), is shown to be completely removed on the Vegetation Retention and Removal Plan, but on the Reinstatement Plan, it is shown as partly replanted with 'H1 Hedgerow mix planting' and partly as 'Existing retained hedgerow or line of trees'. In the immediate vicinity of Hedge H-AB-054 are several other hedges, to which the same applies, however, they do not appear to have been identified, i.e. there are labels neither on the Vegetation Retention and Removal Plan nor the Vegetation Reinstatement Plan.</u>	<u>Sheet 01 and Sheet 02 in LEMP Appendix B: Vegetation Reinstatement Plans (Document 7.8.2 (C)) have been updated at Deadline 7 to show those removed hedgerows as reinstated and to include the hedgerow labels.</u>
1.1.b	<u>Trees</u>	<u>Both the Vegetation Retention and Removal Plan and the Vegetation Reinstatement Plan show a tree (Sheet 02, near H-AB-048) as requiring pruning and then being allowed to regrow naturally. This tree is not shown in Figure 1 Results of Arboriculture Survey (Sheet 1).</u>	<u>This is a small tree at the edge of the Order Limits that was identified through a review of aerial photographs. The Applicant will update the AIA [REP1-011] to add this tree to the plans.</u>
1.1.c	<u>Trees</u>	<u>Nearby on Figure 1 Results of Arboriculture Survey (Sheet 1) is G1025, a group shown as Category U. It extends across the south-eastern corridor and further along the river up unto the north-western corridor. (It is not listed in Table A2 – Tree Group Data, also see comments below). It does not extend across the north-western corridor. However, the Vegetation Retention and Removal Plan shows 'Woodland/group of trees to be pruned' in that north-western corridor. The Vegetation Reinstatement Plan shows this group as 'Existing retained woodland'. As there is no definition of 'pruning' and what this might entail, the landscape and visual effects are difficult to understand.</u>	<u>As stated in paragraph 1.1.1 of Appendix A of the AIA [REP1-011], category C and U features are not presented in the tables.</u> <u>The Applicant considers that pruning is a well understood term in relation to vegetation management. Pruning is also described in paragraph 6.2.23 of the LEMP (Document 7.8 (C)): 'Where branches overhang the working area and / or access routes, these may require trimming back or pruning to avoid further damage for example from passing construction vehicles. All tree works will be carried out by a specialist landscaping or arboricultural contractor to avoid damage to the health of the tree.'</u>
1.1.d	<u>Woodland management</u>	<u>The woodland/group in the south-eastern corridor is identified as wf1 (blue label EM-AB08 on Vegetation Retention and Removal Plan, Sheet 02). As the Arboricultural Survey identified this as Category U, it would be expected that this woodland would benefit from positive management. Instead, the Vegetation Reinstatement Plan shows the majority of it as 'Existing retained woodland' (where pruning would have taken place) with a small strip in the middle earmarked for 'Proposed natural regeneration of woodland' (of coppiced areas). The LEMP contains no detailed prescriptions of how this natural regeneration will be achieved, except a reference to guidance from Flora Locale (2022), and a paragraph on soil management that would be counter-productive (paragraphs LEMP 8.4.10 -8.4.12).</u>	<u>As stated in the REAC [REP6-023], embedded measure EM-AB08 provides that no root removal along the temporary access route will be undertaken through wf1 – Lowland mixed deciduous woodland (Priority Habitat) (Polygon ID HL_262), located within Section AB: Bramford Substation/Hintlesham, from approximate X, Y 608910, 244710 to 608851, 244685.</u> <u>Paragraph 9.2.2 of the LEMP (Document 7.8 (C)) states that inspections will be undertaken to any areas that were coppiced during construction to check that the coppicing is re-establishing. This will confirm that these areas are regenerating as planned or will identify the need for further measures, such as additional planting where the coppicing is not leading to successful regrowth.</u> <u>The Applicant does not consider that further management, in addition to the proposals already described in the LEMP, are required due to the limited effect on this parcel of woodland.</u>
1.1.e	<u>Arboricultural survey</u>	<u>Several trees and groups (all Category C) around Burstall Bridge, as shown in Figure 1 Results of Arboriculture Survey (Sheet 2) are not shown on the Vegetation Retention and Removal Plan (Sheet 04) (G1054, G1057, G1060, G1062, T8 and T11).</u>	<u>These trees and groups are located outside of the Order Limits and are not anticipated to be affected by the project based on the Proposed Alignment and are therefore not shown on LEMP Appendix A Vegetation Retention and Removal Plan (document 7.8.2(C)).</u>
1.1.f	<u>Arboricultural survey</u>	<u>G1088 (Category B) is shown in Figure 1 Results of Arboriculture Survey (Sheet 2), but not on Vegetation Retention and Removal Plan (Sheet 05), although Table A2 - Tree Group Data does earmark it for retention.</u>	<u>ES Figure 7.1.4: UK Habitat Classification (UKHab) Survey [APP-148]- Areas show this area is predominantly grassland (g), other neutral grassland (g3c) and mixed scrub (h3h) and was therefore not identified as trees or woodland on LEMP Appendix A Vegetation Retention and Removal Plan (document 7.8.2(C)). This area lies with the maintained swathe beneath the existing 132kV overhead line.</u>

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1.1.g	Arboricultural survey	<u>EM-P09 (blue label) on Vegetation Retention and Removal Plan (Sheet 05) indicates wet woodland (w1d) to be retained; it does not show the full extent of the woodland, which can be seen in Figure 1 Results of Arboriculture Survey (Sheet 2), as G1089 (Category C).</u>	<u>Embedded measure EM-P09 as secured in the REAC [REP6-023] applies to w1d: wet woodland, and states: W1d - Wet woodland (Polygon ID H A 882) from approximate X,Y 609117, 242911 to 609069, 242902 will be protected and retained. The extent of w1d - wet woodland shown on LEMP Appendix A Vegetation Retention and Removal Plan (document 7.8.1(B)) to which embedded measure EM-P09 applies to is therefore as per the area of w1d - wet woodland shown on ES Figure 7.1.4 UK Habitat Classification (UKHab) Survey – Areas [APP-148].</u> <u>The remaining extent of G1089 shown on Figure 1 of the Arboricultural Impact Assessment [REP1-012] is classed as h3d – Bramble scrub on ES Figure 7.1.4 [APP-148] and is therefore not linked to the commitment.</u>
1.1.h	Arboricultural survey	<u>In the Brett Valley (Vegetation Retention and Removal Plan (Sheet 10) vegetation is shown on either side of Layham Road, where it falls within the DCO boundary. The eastern hedge (H-C-03) consists predominantly of hawthorn, interspersed with the occasional field maple, dogwood and sloe (1 No. observed). West of Layham Road is a line of young trees on an embankment, which include oak, lime, ash. These trees are identified on the Vegetation Retention and Removal Plan (some for coppicing), but not in the Arboricultural Survey. A mature oak tree further south (outside the DCO area) is also present along this road.</u>	<u>The Applicant is reviewing this location against the arboricultural survey field data. The Applicant will update the AIA [REP1-011] to add these trees to the plans.</u>
1.2.a	Arboricultural survey	<u>The AIA is incomplete and inconsistent within itself (i.e. the Tree Constraints Plan is not consistent with the Tree Survey Schedule (i.e. some trees and groups shown on the plan are not listed in the schedule)): T1, T3, G1004, G1007, G1003, G1006, etc. are not listed in the Tree survey Schedule but are shown on the Vegetation Retention and Removal Plan (G1003 and G1006 being H-AB-059).</u>	<u>These trees and groups are classed as category C or U features. As stated in paragraph 1.1.1 of Appendix A of the AIA [REP1-011], category C and U features are not presented in the tables.</u>
1.2.b	Arboricultural survey	<u>It appears that Table A1 – Tree Data and Table A2 - Tree Group Data only list Categories A and B, but not C and D. No rationale for this could be found. Paragraph 1.2.1 states: The purpose of this AIA is to identify the trees which may be affected by the project, and to provide information on their locations, quantity, and quality. The information on tree constraints has informed the design development process.</u>	<u>Appendix A: Arboricultural Survey Data of the AIA [REP1-011] provides the data for high and moderate category trees and groups (categories A and B), respectively. Categories C and U are low and very low quality, respectively.</u>
1.2.c and 1.2.d	Arboricultural survey	<u>Paragraph 2.2.6 states: An arboricultural survey has been undertaken of all qualifying tree and group features but with limited data collection of low and very low-quality features. It is therefore not clear, why the identified 371 Category C trees, 630 Category C Groups, 23 Category U trees and 27 Category U Groups (see Table 3.1 – Summary of Arboricultural Features) are not listed at all in Table A1 – Tree data and Table A2 - Tree Group Data.</u>	<u>Appendix A: Arboricultural Survey Data provides the data for high and moderate category trees and groups (categories A and B), respectively. Categories C and U are low and very low quality, respectively.</u>
1.2.e	Arboricultural survey	<u>G1023 at Rose Cottage, Church Hill, Burstall, consists of a hedgerow with four to five mature oaks, which are specimen trees and should not be classed as a group. Not all trees/ not all of the hedge in this location have been assessed, despite the DCO boundary extending further south. The Vegetation Retention and Removal Plan indicates coppicing and pruning in this area. This would result in detrimental effects of the oaks. There is a further mature oak just south of the DCO boundary.</u>	<u>As explained in paragraph 2.2.2 of the AIA 'Arboricultural features have been recorded as tree groups or wooded areas where this has been deemed appropriate. Tree groups have been recorded on the basis that they form distinct arboricultural features either aerodynamically, visually or because they contain trees of similar cultural and biodiversity value.' On this basis, G1023 was classed as a group as it is considered to form one feature aerodynamically.</u> <u>The Applicant is in the process of undertaking additional surveys at AB-AP5 (near Rose Cottage) in response to Action Point 1 in the Applicant's Response to the December Hearing Action Points [REP6-041]. This includes a detailed tree survey mapping in the specific trees which will be completed over the next few weeks. These specific trees will be added to the AIA and the LEMP Appendices at a future Deadline.</u>
1.3	Arboricultural Impact Assessment	<u>The AIA does not include a Tree Protection Plan, showing Root Protection Areas (RPAs) and Tree Protection Fencing and no Arboricultural Method Statement. It is therefore a Preliminary AIA. The scale of the Figure 1 Results of Arboriculture Survey of 1:10,000 would be too coarse to show these and it is not clear why Figure 1 Results of Arboriculture Survey is not presented at the same scale as the Appendices A and B of the LEMP at 1:2,500.</u>	<u>As set out in Section 1.2 of the AIA [REP1-011]: 'the purpose of this AIA is to identify the trees which may be affected by the project, and to provide information on their locations, quantity, and quality...this AIA comprises a desk study search for baseline information on arboricultural statutory designations, and results of a walkover survey compliant with British Standard (BS) 5837:2012 Trees in relation to design, demolition and construction – Recommendations'</u> <u>Paragraph 5.1.2 of the AIA provides a cross reference to the LEMP (Document 7.8(C)) which in Section 6 sets out the approach to vegetation retention including working near trees (Section 6.2) and working near designated trees (Section 6.3). The Applicant therefore does not consider that</u>

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
			this information is duplicated in the AIA as it is already comprehensively set out in the LEMP (Document 7.8(C)) and its appendices (Document 7.8.1 (B) and Document 7.8.2 (C)).
1.4a	Colour coding	The Vegetation Reinstatement Plan has an inaccuracy in the key (regarding hedgerow planting). Key: the difference between H1 Hedgerow mix planting (purple) and H1 Hedgerow planting (green) is unclear and does not correspond with the Appendix C Planting Schedules); the second (green) entry may be surplus.	H1 Hedgerow mix planting (purple) refers to reinstatement planting where a hedgerow has been removed as shown on LEMP Appendix A: Vegetation Retention and Removal Plan (Document 7.8.1(B)). H1 Hedgerow planting (green) refers to new hedgerow planting where there was not previously a hedgerow. The Applicant has added a note to LEMP Appendix B: Vegetation Reinstatement Plan (Document 7.8.2(C)) at Deadline 7 to clarify this.
1.4b	Colour coding	The colour coding for various hedges and for 'Natural regrowth of pruned trees' vs 'T1 Individual tree planting' is very difficult to decipher.	The Applicant has changed the colour coding for T1 to differentiate more clearly between T1 and pruned trees on LEMP Appendix B: Vegetation Reinstatement Plan (Document 7.8.2(C)) at Deadline 7.
1.4c	Hedgerows	Important hedgerows are not made visible in the plan. The Important Hedgerows Assessment has to be consulted.	Important hedgerows are described in ES Appendix 7.5: Important Hedgerows Assessment [APP-115] and are shown on Figure 7.5.5 [APP-150]. All hedgerows (including Important Hedgerows) are treated as valuable features and are assessed as such in ES Chapter 7: Biodiversity [APP-075], even if not meeting the criteria for Important Hedgerow status and the good practice measures of limiting the hedgerow affected and reinstatement following construction apply to all hedgerows equally. Therefore, the Applicant does not consider that the differentiation between important and non-important hedgerows is required on LEMP Appendix A: Vegetation Retention and Removal Plan (Document 7.8.1(B)) when the information is provided in other supporting documentation.
1.4d	Hedgerows	At the Dedham Vale East CSE compound, hedges H-D-06 and H-D-07 (both 'important' under the 1997 Hedgerow Regulations) are earmarked for reinforcement. It is not clear from the plan whether this is to be planted within the existing hedges or if an additional hedge would be planted on the field side of the existing hedges. Further, this reinforcement, although welcome in principle, may not be possible to achieve, if the access to CSE compound is to be maintained permanently in the location currently shown. There is concern that, if the access is retained in the currently proposed location, a substantial length of hedge would be lost to visibility splays.	The hedgerow reinforcement would be within the existing hedgerow rather than a separate additional hedgerow. LEMP Appendix A: Vegetation Retention and Removal Plan (Document 7.8.1(B)) shows that the existing hedgerow would be coppiced with a short section removed during construction. This would be reinstated and reinforced with extra planting, with the exception of the section required for the permanent access, as shown on LEMP Appendix B: Vegetation Reinstatement Plans (Document 7.8.2(C)).
1.5	Terminology	The LEMP does not provide comprehensive definitions, actions and prescriptions. Likewise, the plans do not clearly indicate where relevant information can be found within the LEMP or other relevant documents. Examples include:	In general, and to keep reporting proportionate and concise, the Applicant does not consider it to define terms that are readily understood. The Applicant considers that when trying to put specific definitions on terms often leads to greater confusion and questions. The Applicant has responded to the specific points below.
1.5a.1	Mitigation measures	It is not explained in the LEMP what MM stands for.	'MM' is a reference code for mitigation measures, used to identify an area on the plans to allow the numbering to be cross referenced in any reporting. It is primarily used as reference in the ES.
1.5a.2	Pruning and coppicing	The terms 'pruning' and 'coppicing', and the differences between them are not explained neither for trees nor for hedges, which could be quite different. At what point does a pruned tree become a pollard or a coppiced tree?	Pruning and coppicing are considered standard terms in vegetation management. Pruning refers to the cutting back of vegetation and branches. Coppicing is generally referred to where the trunk of the tree would be cut to a low level. Pruning is described in paragraph 6.2.23 of the LEMP (Document 7.8 (C)): 'Where branches overhang the working area and / or access routes, these may require trimming back or pruning to avoid further damage for example from passing construction vehicles. All tree works will be carried out by a specialist arboricultural contractor to avoid damage to the health of the tree.' The Applicant has added further definition of coppicing in paragraph 7.2.2 of the LEMP (Document 7.8 (C)) to provide further definition of this term.
1.5.b.1 to 1.5.b.3	Labelling on plans	EM-AB08 (blue label on Vegetation retention and Removal plan, Sheet 02) states: No root removal along the temporary access route would be undertaken through w1f - Lowland mixed deciduous woodland (Priority Habitat) (Polygon ID HL_262), located within Section AB: Bramford Substation/Hintlesham, from approximate X, Y 608910, 244710 to 608851, 244685. The LEMP lists this same information in Table 6.4 – Embedded Measures Relevant to the LEMP without expanding on how this will be achieved or providing a link where such information can be found. There is no expansion in the LEMP on 'w1f –	Paragraph 6.7.1 of the LEMP, explains that the Vegetation Retention and Removal Plan in Appendix A (Document 7.8.1(B)) shows the locations where commitments have been made to avoid or retain specific vegetation. This includes embedded measure EM-AB08 and EM-P09. The Applicant considers that the commitment wording is clear. The Main Works Contractor will need to comply with this commitment when confirming the method to be used, this may include no vehicle access in some locations or may involve protective matting or another suitable method for protecting the soil and rootzone without excavation.

Ref	Matter	Submission from Third Interested Party	Applicant's Comments
		<u>Lowland mixed deciduous woodland (Priority Habitat)</u> . The same is true for EM-P09 (blue label on Vegetation retention and Removal plan, Sheet 05)	
1.5.b.4	<u>Mitigation measures</u>	<u>There is no prescription in LEMP for MM09, a mitigation area to the north of Hintlesham Woods.</u>	<u>It is unclear what this comment is referring to or what further prescription is being sought. Reference is made to MM09 in paragraphs 8.1.1, 8.4.4, and 9.1.2 of the LEMP (Document 7.8 (C)). MM09 is shown on LEMP Appendix B: Vegetation Reinstatement Plans (Document 7.8.2 (C)), which forms part of the LEMP.</u>
1.5.b.5	<u>Mitigation measures</u>	<u>MM01 is not referenced in LEMP.</u>	<u>MM01 is shown on LEMP Appendix B: Vegetation Reinstatement Plans (Document 7.8.2 (C)), which forms part of the LEMP. It relates to additional mitigation (planting) proposed on the project, as referenced within the ES. Paragraph 1.3.3 of the LEMP (Document 7.8 (C)) states that additional mitigation is: any additional project-specific measures that has been identified during the EIA process as being necessary to avoid or reduce significant impacts on the environment. These can be found in CEMP Appendix B: REAC [REP6-023].</u>
1.5.b.6	<u>Important hedgerows</u>	<u>No difference in management is provided for Important Hedgerows.</u>	<u>See the Applicant's response to 1.4c above.</u>
1.5.c	<u>Labelling on the plans</u>	<u>The labels on the Vegetation Reinstatement Plan do not contain any references to where further information and instructions can be found in the LEMP.</u>	<u>LEMP Appendix B Vegetation Reinstatement Plans (Document 7.8.2 (C)) contain a box which states that 'These plans should be read alongside the LEMP and the species mixes proposed in Appendix C of the LEMP' and that 'these plans should be read alongside the CEMP, which contains embedded and good practice measures including around reinstatement of existing features such as walls and boundary features'.</u> <u>The Applicant considers that the LEMP Appendix B Vegetation Reinstatement Plans (Document 7.8.2 (C)) provide the locations of the measures referenced in the LEMP (Document 7.8 (C)). The LEMP uses the same terminology as used on the legend on the plans. Therefore, the Applicant considers that the Main Works Contractor will be able to review the plans alongside the LEMP when implementing the project.</u>
1.6	<u>Hedgerows</u>	<u>Information with regards to Important Hedgerows gets lost from the Vegetation Retention and Removal Plan when these hedges are affected by the works (as this information is overlaid); no distinction is then made between Important and non-important hedgerows; information must be retrieved from the Important Hedgerows Assessment. The current version of the LEMP contains no specific actions for the protection or reinstatement of Important Hedges. Example: Sheet 1, H-AB-018 (important hedge), and H-AB-064 (non-important hedge) are both shown as 'Hedgerow/Line of trees to be pruned.</u>	<u>See the Applicant's response to 1.4c above.</u>
1.7	<u>Hedgerows</u>	<u>Even where hedges are identified as important, information about the species contained within the hedge are not available for many hedges, yet Hedge mix H1 is considered appropriate to be specified for reinstatement.</u> <u>Example: H-AB-058: The table in the Important Hedgerows Assessment does not provide the species occurring in this hedge or how many different species do occur; however, it is assumed that Hedgerow Mix H1 will be suitable for reinstatement in this location. It is considered that the hedgerow mix needs to be fine-tuned to individual locations, as the composition of the hedges throughout the DCO area varies considerably and an out of place hedge mix could result in a long-term visual reminder of the works carried out.</u>	<u>See the Applicant's response to 1.4c above.</u> <u>ES Appendix 7.5: Important Hedgerows Assessment [APP-115] describes the hedgerow species that were recorded at each hedgerow during the site surveys. This information was used to develop the species mixes set out in LEMP Appendix C: Planting Schedule (Document 7.8.3(B)). The Applicant also notes that in accordance with Requirement 9(3) of the draft DC O [REP6-003], a schedule of trees, hedgerows or other plants or seedlings to be planted, noting numbers, species, sizes and planting density of any proposed planting or seedlings will be provided to the relevant local planning authorities for approval.</u>
1.8	<u>Additional mitigation</u>	<u>Opportunities for additional mitigation are being missed. For example, along PRoW w-174/011/0, between Churchill, Burstall, and H-AB071 (Sheet 02 Vegetation Retention and Removal Plan), the hedge should be extended to the road to afford additional visual mitigation for views towards Bramford substation. At Hintlesham Golf Club the existing hedge at LOT-AB-14 (Sheet 03 Vegetation Retention and Removal Plan) should be strengthened and gapped up and then be continued south-eastwards on the eastern side of the exiting track to connect to the woodland.</u>	<u>The Applicant stands by its assessment presented in ES Chapter 6: Landscape and Visual [APP-074], which has been undertaken by suitably qualified landscape architects, which is based on robust methodology set out in Guidelines for Landscape and Visual Impact Assessment 3.</u> <u>In respect to the CSE compounds, the Applicant has updated the wording in Requirement 9 (2) of the draft DCO [REP6-003] to clearly state that the reinstatement planting plan must include a landscape plan for each CSE compound, which will show landscape mounds, planting and proposed finishes for hard landscape features.</u>
1.9	<u>Overall comments</u>	<u>In summary, SCC considers that the LEMP in its current form is incomplete and inconsistent, which makes it unreliable. The information that the LEMP should provide an</u>	<u>The Applicant considers that the LEMP is fit for purpose and complete and has responded to the specific points in the line items above. The Management Plans are a suite of documents that work</u>

Ref	Matter	Submission from Third <u>Interested</u> Party	Applicant's Comments
		<p><u>easy-to-follow format to enable easy reference on-site during implementation. This is not the case as several documents (not all part of the LEMP) have to be consulted to obtain relevant information. The conclusion is that the LEMP in its current format is not fit for the purpose of serving as a final control document.</u></p>	<p><u>together to deliver the commitments made on the project, which is standard on many large construction projects.</u></p>

5. Outline Written Scheme of Investigation

5.1 Introduction

5.1.1 Table 5.1 sets out the Applicant's review of submissions received from Interested Parties on the OWSI at Deadline 6. This includes the comments in Section 7.14 of ECC/BDC Deadline 6 Response [REP6-051].

Table 5.1 – Comments on the OWSI

Ref	Matter	Submission from Interested Party	Applicant's Comments
ECC/BDC Deadline 6 Response Post Hearing Submissions for CAH2, ISH5 and ISH6, Comments on Applicant responses to Deadline 4 Submissions, Comments on any other Documents [REP6-051]			
7.14.3	Section 1.2 Purpose of the Report	Section 1.2 needs to clarify the nature of work undertaken to date and make clear that the level of evaluation to date has been limited and that further evaluation will be required post consent especially in those areas not being undergrounded and where there are running tracks or access tracks.	<p>The Applicant does not consider that the level of evaluation to date has been limited and that the evaluation undertaken on the project is appropriate and proportionate to the scale of potential effect. Additional text has been added at paragraph 1.2.4 of the OWSI (Document 7.10 (C)) to list the desk and field studies that have informed the mitigation approach.</p> <p>The comment from ECC/BDC appears to relate to the archaeological trial trenching (ATT). The Applicant set out its approach to ATT within Section 2.6 of the Archaeological Framework Strategy (AFS) [APP-186]. This states that ATT has been targeted in areas of the greatest impact (ground disturbance) which may result from the project, namely the underground cable route, CSE compounds, GSP substation and the main construction compound. ATT has targeted anomalies identified in the aerial investigation and mapping (AIM) and geophysical surveys as well as a number of areas where no anomalies were identified. 243 targeted ATT have been completed on the project in five phases/ mobilisations. Section 2.6 of the AFS also outlines the areas not suitable for ATT and that were therefore excluded from the ATT. ATT is not considered appropriate in the overhead line sections of the project due to the limited ground disturbance that would occur, and the flexibility requested in the DCO as part of the Limits of Deviation. As shown on Figure 1 of the OWSI (Document 7.10 (C)), archaeological mitigation in the form of watching brief would be undertaken in the overhead line sections where ATT has not been undertaken. The ATT was completed in November 2023 in accordance with the method set out within the AFS [APP-186] and no further ATT is proposed (also see 7.14.5 below).</p>
7.14.4	Section 1.3 Aims and Objectives	Section 1.3.3 those areas where archaeological mitigation is not proposed needs to be reconsidered on a site-by-site basis depending on the nature of the work and until no impact can be confirmed these should remain within the areas to be assessed.	The Applicant considers that the activities listed in the bullet points in paragraph 1.3.3 of the OWSI (Document 7.10 (C)) would not experience any adverse impacts to archaeological remains during construction and would therefore be excluded from mitigation.
7.14.5	Section 1.5 Structure of the Report	Section 1.5.1 This section needs to include further evaluation work in those areas not evaluated to date.	<p>The ATT was completed in November 2023 in accordance with the method set out within the AFS [APP-186] and no further ATT is proposed. Interim ATT reports have been issued to the relevant planning authorities for the first four of five phases of the completed ATT. The final report compiling all of the results (with final, full reporting on all the phase 5 project trenching) is anticipated to be issued to the relevant planning authorities in March 2024.</p> <p>The Local Archaeological Advisors at the relevant councils were issued with the daily trench details during the ATT as part of them signing off the closure of trenches, in accordance with the Detailed Written Schemes of Investigation (DWSI) that was produced for the ATT, so have a degree of understanding of what was found on site in absence of the final report.</p>
7.14.6	Section 1.5 Structure of the Report	The description of SMS is not appropriate. This should be clear that this is a planned phase of archaeological investigation for which the topsoil needs to be stripped well ahead of construction to allow for open area excavation if required, although this can be within the construction programme and use their plant, but should be undertaken well in advance of the proposed construction date	The Applicant has amended the wording of the archaeological strip, map and sample (SMS) bullet point in paragraph 1.5.1 of the OWSI (Document 7.10 (C)) in response to the council's comment.
7.14.7	Section 1.5 Structure of the Report	In the following bullet point watching brief should be redefined as archaeological monitoring following the guidance of CiFA.	The Applicant considers the wording in the OWSI (Document 7.10 (C)) to be consistent with the wording in the Chartered Institute for Archaeologists (CIfA) standard and guidance for archaeological watching brief (CIfA, 2020).
7.14.8	Section 2.2 Roles and Responsibilities	Section 2.2 needs to have a clear definition of the role of the archaeological advisors. We will require access to the site for monitoring, site discussions	The Applicant considers that the role of Local Authority Advisors is adequately set in paragraph 2.2.2 of the OWSI (Document 7.10 (C)). Further details on roles would be set out in the DWSI.

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
		and sign off for the work prior to construction taking place. (A wording from Lower Thames Crossing can be provided).	
7.14.9	Section 2.4 Detailed Written Scheme of Investigation	Section 2.4 you may consider separate detailed WSI's for each site, rather than trying a single detailed WSI to cover the whole route.	The Applicant has made amendments to paragraph 2.4.2 of the OWSI (Document 7.10 (C)) in response to the Council's comments, to make it clear that the DWSI refer to multiple documents, not one for the whole project.
7.14.10	Section 4.3 Detailed Written Scheme of Investigation	Section 4.3.1 The local authority archaeologists will need to sign off the DWSI prior to the commencement of work and this should be made clear in this text.	No change to the OWSI, as the approval of DWSI by the Local Authority Advisors is already set out in paragraph 2.2.2 of the OWSI (Document 7.10 (C)) and is stated within Requirement 6: Archaeology of the draft DCO.
7.14.11	Chapter 5 Archaeological Strip, Map and Sample	Section 5 Should be renamed Strip Map and Sample Excavation.	The Applicant has amended the title heading in Section 5 and paragraphs 5.1.1, 5.1.5 and 5.2.1 of the OWSI (Document 7.10 (C)) in response to the Council's comments to include 'excavation'.
7.14.12	Section 5.1 Introduction	This programme of work should be programmed in advance of the construction phase thus allowing for the required excavation to take place rather than having to cease construction whilst the archaeological excavation work is undertaken. We would always recommend a number of months between the two activities.	The Applicant has amended paragraphs 1.5.1 and 5.1.2 of the OWSI (Document 7.10 (C)) to clarify the timing of SMS excavation to reinforce this in response to the Council's comments.
7.14.13	Section 5.1 Introduction	5.1.2 The comment that SMS is a rapid form of excavation is misleading and should be removed. As stated above if the work is tied into the contractors programme several months should be organised between the strip date and start of construction to avoid hold ups to the development. Many SMS sites lead into open area excavations (OAE) which would have the potential to hold up construction if not properly timetabled.	The Applicant has amended paragraph 5.1.2 of the OWSI (Document 7.10 (C)) to align with the definition of SMS as defined by the Council. The Applicant notes that it has undertaken ATT in the areas of proposed SMS excavation and made the mitigation recommendation based on the results.
7.14.14	Chapter 6 Archaeological Watching Brief	Section 6 Should now be referred to as Archaeological Monitoring and Recording following the CiFA guidelines.	The Applicant has not amended 'watching brief' to 'archaeological monitoring and recording', in order to maintain consistency with ES Chapter 8: Historic Environment [APP-076] and the AFS [APP-186], as the ClfA (2020) guidance was the latest watching brief guidance at the time of the historic environment assessment. However, the Applicant has added '(also known as archaeological monitoring and recording)' to the watching brief description in Section 6.1 of the OWSI (Document 7.10 (C)), in response to the Council's comments.
7.14.15	Section 6.2 Locations	The locations of this method can only be agreed where there is an appropriate level of previous evaluation, otherwise Strip Map and Sample will be a more appropriate technique.	An appropriate level of evaluation has been undertaken on the project and the OWSI prepared using the results of that evaluation. The Applicant has undertaken ATT in the areas of proposed SMS excavation and made the mitigation recommendation based on the results.
7.14.16	Chapter 7 Geoarchaeological and Palaeoenvironmental Mitigation	Section 7, as no field assessment has been undertaken then the title should reflect this and include Assessment and mitigation.	The Applicant has undertaken boreholes across the Order Limits and the borehole logs have been reviewed by a geoarchaeological and palaeoenvironmental specialist as part of developing the deposit model for the project. The Applicant believes that the term 'assessment' creates confusion with the assessment presented within the ES. Therefore, instead, the Applicant has amended the title of Chapter 7 of the OWSI (Document 7.10 (C)) to 'Geoarchaeological and Palaeoenvironmental Investigation and Mitigation' in response to the Council's comments.
7.14.17	Chapter 7 Geoarchaeological and Palaeoenvironmental Mitigation	Further advice should be obtained from the Historic England Science Advisor as the section on geoarchaeological and palaeoenvironmental work seems to be rather lacking in information and the archaeological contractor will need guidance to create their DWSI.	The Applicant has received an updated geoarchaeological and palaeoenvironmental assessment (GPA) from the specialist geoarchaeological contractor. Chapter 7 of the OWSI (Document 7.10 (C)) has been amended in line with the results. The AFS [APP-186] and OWSI (Document 7.10 (C)) have both been issued to Historic England for comment and it has responded to say that it defers to the county archaeological advisors on these documents, as recorded in line 2.4 in the Statement of Common Ground Historic England (Document 8.7.2 (B)).
7.14.18	Chapter 8 Dissemination	Section 8 needs to clearly define the role of the Local Authority Archaeological Advisors (LAAA) in monitoring and signing off the post excavation work including the PXA and the final publication.	The Applicant has amended paragraphs 8.1.2 and 8.1.4 of the OWSI (Document 7.10 (C)) to include reference to Local Authority Advisor approvals in response to the Council's comments.

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
7.14.19	Section 8.6 Outreach	Section 8.6 Needs more detail to define the extent of the outreach potential of the project especially in the area of digital outreach.	The Applicant has added a new paragraph (8.6.3) to the OWSI (Document 7.10 (C)) stating inclusion of outreach opportunity in DWSI in response to the Council's comments. The Applicant does not consider it proportionate or necessary to include services of a community archaeologist on a project of this nature.
7.14.20	Summary of comments on the OWSI	In summary there is concern regarding the level of archaeological field evaluation undertaken to date and how the further evaluation will be accomplished during construction. The method of SMS is appropriate but should be clearly defined within the OWSI that it is more than just a monitoring exercise and is likely to lead to areas of open area excavation which could take a significant amount of time to excavate depending on its complexity. The role of the LAAAs should be clearly defined in their role in monitoring and signing off of the WSI's, fieldwork and post excavation work.	As noted above, the Applicant has amended the definition of SMS in Chapter 5 of the OWSI (Document 7.10 (C)) and included reference in the OWSI (Document 7.10 (C)) to the role of Local Authority Advisors in the approval of DWSI in response to the Council's comments.
Suffolk County Council Archaeological Service (SCCAS) Comments on 7.10 OWSI (not yet submitted into Examination but provided to the Applicant on 18 December 2023)			
1a	Archaeology	The OWSI has not been approved. SCC and Essex Place Services are working on joint comments for the document which will be provided to the Applicant prior to Deadline 7. The joint comments will be submitted for the EXA at Deadline 7. Further, SCC and Essex Place Services are working on joint comments for the Historic Environment sections of the REAC.	Noted. The Applicant will review the documentation submitted by SCC and Essex Place Services at Deadline 7 and will respond at a future deadline.
1.2.2	Results of ATT	The results of the trenched archaeological evaluation have only been provided in summary reports for staged 1 – 4, SCCAS is still awaiting the results of the Stage 5 trenched archaeological evaluation.	Please see Applicants Comments to 7.14.3 and 7.14.5 above. The final phase of the ATT (Phase 5 trenching near Alphamstone in Essex) was completed in November 2023. The Archaeological Advisor at the Council was involved in signing off the trenches at the end of each day. The Applicant is not intending to produce an interim report for the Stage 5, instead it will produce a final full report inclusive of all post-excavation tasks (including phase 5 trenching results) in one report. This final report will be issued by May 2024 in accordance with the DWSI.
1.2.2	ATT sampling area	Trenching that has been completed so far was done at a 2% sample of the redline area. As this is a low sample a second phase of trenched archaeological evaluation would be required within the trenched areas to aid in the definition of areas for archaeological mitigation where trenching has already been undertaken.	The Applicant is unsure how a 2% area has been calculated and disagrees that a 2% sample has been completed. Any sampling needs to take into consideration the areas capable of being trenched (i.e., areas such as steep slopes, wooded/ vegetated areas, watercourses etc need to be removed from this sample as they cannot be safely or reasonably be trenched). Areas of no, or low impact should also be removed from a sample area as the cost of such evaluations are not in proportion to the scale of potential effect (much of the Order Limits will not be topsoil stripped). It is not appropriate, efficient or cost effective to evaluate areas of no or low impact such as trenchless crossings, overhead line removal where the ground has previously been disturbed, overhead line spacings where the ground will not be disturbed (and conductor swing), areas of previous mining and other land use where ground disturbance has occurred. Disturbance to landowners also needs to be considered in the programme of evaluation. ATT is not considered appropriate in the overhead line sections of the project due to the limited ground disturbance that would occur, and the flexibility requested in the DCO as part of the Limits of Deviation. Alternative measures have been put in place in the OWSI. The Applicant disagrees with applying an arbitrary percentage to qualify the amount of ATT. Instead, it has undertaken ATT in locations where topsoil would be stripped (which is a much smaller area than the total Order Limits. The Applicant has targeted buried anomalies detected through aerial interpretation and mapping (AIM) and geophysical survey, with additional trenches in areas of no anomalies to test for the presence of archaeological remains in blank areas. The ATT locations is based on the methodology set out in Section 2.6 of the AFS [APP-186]. The Applicant is not anticipating the need for any further ATT on the project and has undertaken an appropriate strategy of ATT evaluation.
1.2.2	ATT	This paragraph should also clarify that trenched archaeological evaluation has only been undertaken within the undergrounding sections of the proposal and CSE compounds. No trenched archaeological evaluation has been undertaken outside of these areas of the proposal, within the areas of overhead lines or haul roads and a second phase of trenched archaeological evaluation, undertaken post-determination would be required to determine appropriate levels of archaeological mitigation in these areas.	Please see Applicants Comments to 7.14.3, 7.14.5 and 1.2.2 above. ATT has been undertaken within the Order Limits for the underground cable, the CSE compounds, GSP substation and the main construction compound. The ATT locations are based on the methodology set out in Section 2.6 of the AFS [APP-186]. The Applicant considers that a watching brief is sufficient mitigation in the sections of overhead line based on the small footprint i.e. the base of the new pylons and the temporary access routes, given their limited width and the flexibility provided within the Limits of

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
			<u>Deviation. The approach will ensure any archaeological remains are preserved by record. The Applicant is not anticipating the need for any further ATT on the project.</u>
<u>1.2.6</u>	<u>ATT</u>	<u>This needs to state that the trenched archaeological evaluation was largely completed within the undergrounding sections of the proposal, with some areas un-able to trench due to ecological constraints. For Suffolk there was G6 – trenches G6.24 – G6.28.</u>	<u>The Applicant has updated paragraph 1.2.7 of the OWSI (Document 7.10 (C)) to state that the trial trenching was carried out in sections of the project where large areas of surface excavation are anticipated. This includes the underground cable sections, the GSP substation, the CSE compounds and the main construction compound.</u> <u>The Applicant does not consider that the OWSI needs to include reference to the specific trenches not completed, as this would be detailed within the ATT report and is not relevant to the purpose of the OWSI in setting out the approach to mitigation.</u>
<u>1.3.2</u>	<u>Medlycot reference</u>	<u>Medlycot (2011) is now an online archaeological resource assessment/ research Agenda. The document needs to reference up-to-date research framework/ agendas.</u>	<u>The Applicant has updated the references from Medlycot to the online East of England Regional Research Framework in response to the Council's comments.</u>
<u>1.3.3</u>	<u>Aims and Objectives of the OWSI</u>	<u>In locations where overhead lines are to be removed there needs to be archaeological assessment to establish whether there will be impacts on any archaeology during the decommissioning and construction works. This would be for compounds, pylon construction areas and access routes constructed to facilitate the removal and modification works. If so, in areas of ground disturbance appropriate levels of archaeological evaluation will be required to determine the impact of the proposal on archaeology.</u>	<u>The Applicant disagrees that there needs to be archaeological assessment or evaluation for overhead line removal.</u> <u>As stated in paragraph 2.6.7 of the AFS [APP-186], archaeological assessment is not proposed in locations that have been subject to previous ground disturbance. This would include where existing pylons are to be removed where the ground would have been disturbed during the original pylon construction.</u> <u>As stated in Section 4.5.3 of ES Chapter 4 Project Description: <i>It is assumed that the 132kV removal can be undertaken using vehicles of a similar size to farm machinery and therefore for the purposes of the ES, it is assumed that the temporary access routes for the removal of the 132kV overhead line would either use existing tracks or use trackway matting (assumed to be 4m wide) to protect the soil and avoid the need for soil stripping.</i></u> <u>As shown on Figure 1 of the OWSI (Document 7.10 (C)), the Applicant is proposing to undertake a watching brief for the new pylon bases and temporary access routes where the topsoil is required to be removed, as this is considered to be proportionate to the limited amount of topsoil that would be disturbed.</u>
<u>1.3.3</u>	<u>Aims and Objectives of the OWSI</u>	<u>Trenchless Crossing:</u> <ul style="list-style-type: none"> ● <u>The area of the trenchless crossing should be subject to geoarchaeological and palaeoenvironmental archaeological assessment, providing deposit models and palaeoenvironmental information, to determine the level of mitigation (if required) on sensitive deposits of archaeological importance that would be damaged or destroyed by the proposed trenchless crossing.</u> ● <u>This should include C-14 dating for the top and bottom of peat sequences.</u> ● <u>This should also include groundwater testing to determine damage to any potential waterlogged deposits, such as peats which are known to exist within the Stour River Valley from the 2013 borehole survey.</u> ● <u>The scheme needs to consult with Historic England Science Advisor for the Eastern Region regarding impacts on hydrology, palaeoenvironment and geoarchaeology</u> 	<u>A geoarchaeological desk-based assessment has been produced for the project by a specialist geoarchaeological contractor. This has modelled the buried soils associated with the river valleys, including the Box and Stour, where underground cables are proposed. Recommendations for the further investigation and mitigation of environmental deposits at these locations has been made in Chapter 7 of the OWSI (Document 7.10 (C)). The Applicant is intending to undertake further geoarchaeological and palaeoenvironmental assessment of the launch and receiving pits at the trenchless crossings for the River Stour and the River Box.</u> <u>-</u> <u>Historic England has said that it defers to the county archaeological advisors on archaeological matters, as recorded in line 2.4 in the Statement of Common Ground Historic England (Document 8.7.2 (B)).</u>

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
1.3.3	<u>Aims and Objectives of the OWSI</u>	<p><u>Planting:</u></p> <ul style="list-style-type: none"> ● <u>Planting areas should be considered for archaeological assessment, evaluation and mitigation depending on the planting proposals.</u> ● <u>Any areas of tree planting need to be assessed for archaeological potential and an appropriate level of archaeological evaluation (geophysics and trenched archaeological evaluation) would need to be undertaken as root growth will have significant below-ground impacts which would damage and/or destroy any below-ground heritage assets that could exist within these areas.</u> ● <u>Any areas of habitat creation would need subject to the same level of archaeological assessment (geophysics and trenched archaeological evaluation) as described above.</u> 	<u>The Applicant has looked at all areas proposed for Environmental Gain and undertaken an appraisal of the known constraints including Historic Environment Records data. The Applicant does not consider there to be a need for archaeological evaluation of habitat areas, as the evaluation would be more damaging than the habitat creation.</u>
1.4.1	<u>Definitions Used within the OWSI</u>	<u>In LAAA bullet point the reference to SCCAS should read as Suffolk County Council Archaeological Service.</u>	<u>The Applicant has amended the Local Authority Advisors bullet point in paragraph 1.4.1 of the OWSI (Document 7.10 (C)) to change 'Suffolk County Council Archaeology Service' to 'Suffolk County Council Archaeological Service' in response to the Council's comments.</u>
1.5.1	<u>Structure of the OWSI</u>	<p><u>The OWSI should summarise the archaeological work that has been undertaken, DBA, Geophysical survey and trenched archaeological evaluation.</u></p> <p><u>ClfA have updated their standards and guidance for archaeological excavation, field evaluation and monitoring and recording, please ensure this document reflects these changes in guidance.</u></p>	<p><u>Paragraph 1.5.1 of the OWSI (Document 7.10 (C)) references the structure of the document. A paragraph in Chapter 1 (now paragraph 1.2.4) summarises the reporting and fieldwork undertaken in response to the Council's comments.</u></p> <p><u>The Applicant has updated the OWSI (Document 7.10 (C)) to cross-reference the latest ClfA guidance and has updated the document to reflect the latest guidance where appropriate, for example the definition of archaeological excavation provided in paragraph 4.1.1.</u></p>
1.5.1	<u>Definition of SMS</u>	<u>The description of archaeological SMS is of an archaeological monitoring and recording. SMS is not a rapid form of investigation undertaken immediately ahead of construction works. Please see comments on sections 5.1.1/5.1.2 below.</u>	<u>The Applicant has amended the definition of SMS in paragraph 5.1.2 of the OWSI (Document 7.10 (C)) in response to the Council's comments.</u>
1.5.1	<u>ATT areas</u>	<p><u>There has only been low level of trenched archaeological evaluation within the undergrounding sections of the proposal, at a 2% sample, there is insufficient information to accurately define areas for archaeological mitigation where trenched archaeological evaluation has been undertaken.</u></p> <p><u>As a result, there is a need for further trenched archaeological evaluation to be undertaken post-determination for the areas that have not been trenched and in the areas that have been subject to pre-application trenched archaeological evaluation so the archaeological resource can be accurately quantified.</u></p>	<u>Please see the Applicants Comments on 1.2.2 above.</u>
1.5.1	<u>Definitions Used within the OWSI</u>	<u>With the update to the ClfA guidance, the term Watching Brief should be updated to Archaeological Monitoring and Recording. Proactive Watching Brief should be changed to Continuous Archaeological Monitoring and Recording.</u>	<u>Please see the Applicants Comments on 7.14.14 above.</u>
1.5.1	<u>Post-determination archaeological evaluation</u>	<u>The OWSI does not have provision for post determination archaeological evaluation, which should comprise geophysical survey (prospection) and trenched archaeological evaluation, which will determine the presence/absence, extent, character, condition and significance in order to inform on archaeological mitigation strategies. Please see details below:</u>	<u>The Applicant considers that the aerial interpretation and mapping (AIM), geophysical survey and ATT completed is sufficient for identifying the required mitigation on the project as per the methodology outlined in the AFS [APP-186]. The Applicant is not proposing to undertake any further geophysical survey or ATT on the project.</u>

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
1.5.1	<u>Post-determination Geophysical Survey</u>	<u>Geophysical survey will be required in locations where it has not been previously possible. This would need to be undertaken in advance of intrusive archaeological investigation, the results of the survey will need to be 'ground truthed' and be combined with the results of trenched archaeological evaluation to aid in the formulation of archaeological mitigation strategies.</u>	<u>The Applicant does not consider there to be a need to undertake further geophysical surveys on the project, given the limited footprint that would be disturbed in the overhead line sections.</u>
1.5.1	<u>Post-determination archaeological evaluation</u>	<p><u>The OWSI needs to detail further trenched archaeological evaluation, as a low sample of trenched archaeological evaluation (2%) has only been undertaken within the undergrounding areas to allow the LAAA and Examining Authority to determine the application.</u></p> <p><u>However, there is a requirement for further trenched archaeological evaluation, which could be undertaken post-determination. This will be required within the areas that have been subject to pre-application trenched archaeological evaluation to increase the area sampled to a 4% sample by area, which will aid in the definition/refinement of mitigation areas.</u></p> <p><u>Further trenched archaeological evaluation will also be required in areas that have not been subject to intrusive archaeological assessment, including haul roads, compound areas and pylon locations. An appropriate sample to allow the archaeological resource to be accurately quantified would be 4% by area trenched archaeological evaluation following geophysical survey, to sample geophysical anomalies and any blank areas. Where geophysics is not undertaken the sample will need to be 5% by area.</u></p> <p><u>Further evaluation will determine the presence/absence, character, extent, quality, depth and significance of any archaeology present and, will inform on the appropriate level of archaeological mitigation. Post-determination trenched archaeological evaluation will require submission of a scheme wide DWSI. Any archaeological mitigation based on the results of the post-determination trenched archaeological evaluation would need to be under a separate DWSI for archaeological mitigation, which will need to be submitted to the relevant LAAA for review and approval.</u></p>	<u>Please see the Applicants Comments on 1.2.2 above.</u>
2.2.1	<u>Archaeological Clerk of Works</u>	<u>Due to the size of the project will National Grid have an Archaeological Clerk of Works appointed to the project?</u>	<u>The Applicant has added reference to an Archaeological Clerk of Works in paragraph 1.4.1 of the OWSI (Document 7.10 (C)), in response to the Council's comments.</u>
2.2.1	<u>Roles and Responsibilities</u>	<p><u>The first bullet point should be the following:</u></p> <ul style="list-style-type: none"> <u>● Appointing a suitably qualified and experienced* Archaeological Contractor</u> <p><u>*experience should include undertaking and delivering archaeological works large infrastructure projects, working in East Anglia and experience of the varied geologies that will be within the proposed scheme of works.</u></p>	<u>The Applicant has amended the first bullet point in paragraph 2.2.1 of the OWSI (Document 7.10 (C)) to say 'Appointing a suitably qualified and experienced Archaeological Contractor, with experience in undertaking and delivering archaeological works on large-scale infrastructure projects and working in East Anglia and its varied geologies;' in response to the Council's comments.</u>
2.2.1	<u>Roles and Responsibilities</u>	<p><u>Additional bullet points here that National Grid will be responsible for:</u></p> <ul style="list-style-type: none"> <u>● Daily communication with the archaeological contractor during archaeological site works.</u> <u>● Preparing weekly updates on archaeological fieldwork for the relevant LAAA.</u> <u>● Arranging site monitoring visits with the relevant LAAA.</u> <u>● Providing regular updates on the post-excavation works to the relevant LAAA.</u> <p><u>This should also state that National Grid will have unrestricted access to the archaeological works.</u></p>	<p><u>The text in paragraphs 2.2.1 and 2.4.2 of the OWSI (Document 7.10 (C)) has been updated as follows with further details of timings of specific activities provided within the relevant DWSI:</u></p> <ul style="list-style-type: none"> <u>● 'Maintaining regular communication with the nominated archaeological contractor(s) during archaeological site work'. Daily contact may not be appropriate or required in all cases;</u> <u>● 'Preparation of regular updates on fieldwork and post-excavation to National Grid for forwarding to the Local Authority Advisors'. Weekly updates may not be appropriate or required in all cases; and</u> <u>● 'Provision for site monitoring visits by the Local Authority Advisors'.</u> <p><u>The need for regular reporting has also been included in paragraph 2.6.2 of the OWSI (Document 7.10 (C)), noting that this will depend on the nature and the stage of the archaeological mitigation being undertaken and that daily contact will not be appropriate or required in all cases.</u></p>

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
			As the Applicant is the client, the need for including the client's own unrestricted access to its archaeological work is unnecessary.
2.2.2	<u>Roles and Responsibilities</u>	<ul style="list-style-type: none"> • <u>The LAAA's advise the Local Planning Authorities across the project. This is SCCAS for the LPAs in Suffolk and EPS for the LPAs in Essex.</u> • <u>The LAAA will provide archaeological briefs/specifications for the production of the DWSIs.</u> • <u>The LAAA will have unrestricted access to archaeological sites and will be responsible for monitoring fieldwork and when necessary review site records during fieldwork.</u> • <u>The LAAA will review and approve post-excavation documents, publications and archiving</u> 	<p>The Applicant has updated paragraph 2.2.2 of the OWSI (Document 7.10 (C)) to mention by name SCCAS and EPS as the Local Authority Advisors.</p> <p>The Applicant believes that the OWSI (Document 7.10 (C)) is sufficient as a method statement to be the basis for the DWSI. The inclusion of briefs/specifications by the Local Authority Advisors will not be necessary, as the requirement for mitigation in each area will be confirmed through the Applicant's engagement with the Local Authority Advisors.</p> <p>The Local Authority Advisors would not have unrestricted access to archaeological sites, as arrangements will need to be made through National Grid and its contractor to ensure safety of personnel on site. Specific process relating to access to the archaeological work will be included in the DWSI.</p> <p>Section 8 of the OWSI (Document 7.10 (C)) states that the Local Authority Advisors would review and approve the post-excavation documents such as the Post-Excavation Assessment (PXA) Report and the Archive Report.</p>
2.2.2	<u>Roles and Responsibilities</u>	<p>The programme of archaeological work will be delivered by the archaeological contractor, under the leadership of an experienced Archaeological Project Manager.</p> <p>Once an archaeological contractor has been instructed, National Grid will provide the details of the archaeological contractor to the relevant LAAA's. The archaeological contractor's details will be provided within each of the DWSIs, and will include named key specialists who will be site-based or have regular access to site, or who will be able to attend site at short notice. This will include (but not limited to) the following roles: Project manager; Environmental specialists, i.e. Archaeobotany, charcoal, macrofossil and microfossil; Mineral preserved organics specialist; Lithics specialists with relevant period expertise*; Ceramics specialists with relevant period expertise*; Metalwork specialists with relevant period expertise*; Geoarchaeologist; Geophysicist; Archaeological surveyor; Human remains specialist – experience of working with cremated human remains; Animal bone specialist; Scientific dating specialist; Metal detectorist; Public archaeology and community engagement team; Conservation specialist; Conservation lab details; Finds coordinator/processing specialist; Digital data manager; and a Publication manager;</p> <p>*The archaeological contractors archaeological specialists will need to have experience of working in East Anglia and of local typologies.</p> <p>National Grid will be provided with the details of the individuals fulfilling these roles immediately after appointment of the archaeological contractor to the project.</p> <p>National Grid will provide this information to the LAAAs. The LAAAs will need to be notified of any changes to the named individuals and will need to be notified of the new appointment.</p>	<p>The Applicant has added a new paragraph (2.3.4) to the OWSI (Document 7.10 (C)) to say that the Local Authority Advisors will be notified of the Archaeological Contractor appointed by the Applicant.</p> <p>The Applicant has amended paragraph 2.4.2 of the OWSI (Document 7.10 (C)) to clarify that the DWSI will include named roles for the specialists at fieldwork and post-excavation stages.</p> <p>The need for the Archaeological Contractor to have experience in delivering archaeological works on large-scale infrastructure projects and working in East Anglia and its varied geologies, and also reference to the Applicant providing change of personnel notifications to the Local Authority Advisors have been added to paragraph 2.2.1 of the OWSI (Document 7.10 (C)).</p>
2.2.2	<u>Roles and Responsibilities</u>	For environmental sampling and scientific dating the DWSI will state that there is provision for consultation with Historic England's regional science advisor (East of England) for advice on sampling and scientific dating strategies.	Historic England has said that it defers to the county archaeological advisors on archaeological matters, as recorded in line 2.4 in the Statement of Common Ground Historic England (Document 8.7.2 (B)).
2.3.2	<u>Archaeological Contractor Requirements</u>	The archaeological contractor will need to design the archaeological fieldwork in a DWSI, which will be in accordance with the OWSI and archaeological brief/specification provided by the relevant LAAA.	The OSWI (Document 7.10 (C)) already states in paragraph 2.3.2 that the Archaeological Contractor will be responsible for designing the archaeological fieldwork in DWSI and this will be in accordance with CfA guidance. However, the Applicant has added the additional references to the list for clarity in response to the Council's comments.

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
		<p>The archaeological contractor will carry out the mitigation works to the relevant ClfA, Historic England, Suffolk County Council standards and guidance:</p> <p>SCCAS guidance for:</p> <ul style="list-style-type: none"> ● <u>Geophysical Survey (2023);</u> ● <u>Palaeoenvironmental assessment (2018);</u> ● <u>Trenched Archaeological Evaluation (2023);</u> ● <u>Archaeological Excavation (2023);</u> ● <u>Excavating inhumations for Mineral Preserved Organics (2023);</u> ● <u>Archive Preparation and Deposition (2022);</u> ● <u>Historic England (2015) Management of Research Projects in the Historic Environment; and</u> ● <u>ClfA universal guidance for evaluation, excavation and monitoring and recording (2023).</u> <p>This section should also include guidance for Essex Place Services when working in Essex.</p>	
2.4	Reference to REAC requirements	This section should also reference the REAC archaeological requirements.	The Applicant has amended paragraph 2.4.2 of the OWSI (Document 7.10 (C)) to state that the DWSI will include reference to the commitments contained within the REAC.
2.6	Frequency of communications	<p>During site work there should be allowance for daily communication with the relevant LAAA, National Grid and/or Main Works Contractor and the Archaeological Contractor, particularly during fieldwork to allow for sign off of completed areas when needed.</p> <p>Regular site monitoring visits should be scheduled in as soon as DWSI have been approved. The frequency of which will depend on the complexity of the works and significance of any archaeology or deposits of archaeological significance.</p>	<p>The text in paragraphs 2.2.1 and 2.4.2 of the OWSI (Document 7.10 (C)) has been updated as follows with further details of timings of specific activities provided within the relevant DWSI:</p> <ul style="list-style-type: none"> ● <u>'Maintaining regular communication with the nominated archaeological contractor(s) during archaeological site work'. Daily contact may not be appropriate or required in all cases; and</u> ● <u>'Provision for site monitoring visits by the Local Authority Advisors'.</u>
3.1.1/3.2.1	Preservation <i>in situ</i>	The title of this section should be Preservation in situ	The Applicant has amended the title of Chapter 3 to 'Preservation <i>in situ</i> '.
3.1.1/3.2.1	Preservation <i>in situ</i>	<p>Though there are currently no proposed locations for preservation in situ which have been identified within the areas subject to trenched archaeological evaluation. Should any locations requiring preservation in situ be identified during the future investigations, this section should specify that: <u>'Where preservation in situ can be achieved and agreed with the relevant LAAA, a detailed management plan document would be required to detail and set preservation in situ of the buried heritage asset during the construction phase and the buried heritage assets long term preservation of the buried heritage asset.'</u></p> <p>Where preservation in situ cannot be achieved by avoidance* discussions with SCC Archaeological Service would be required and appropriate mitigation strategy implemented.</p> <p>*Avoidance mainly achieved through design and embedded mitigation be recommended when significant archaeological remains are discovered during archaeological works. The aim is to avoid damage to heritage assets by removing the impact. Areas of avoidance would need to be mapped and</p>	No remains worthy of preservation <i>in situ</i> have been identified based on the results of the completed ATT. Section 3.2 of the OWSI (Document 7.10 (C)) confirms that there are no locations proposed for preservation <i>in situ</i> . Therefore, the Applicant considers that the additional text proposed by the Councils does not need to be added to the OWSI (Document 7.10 (C)).

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
		<p>fenced off from the main construction works and impacts. Any areas of preservation in situ that may be identified must be treated as 'no touch areas'.</p> <p>Once archaeology has been exposed it must be excavated and recorded.</p>	
3.1.3/3.2.1	Preservation <i>in situ</i>	<p>It is currently unknown whether there would be any further areas of preservation in situ in the areas of the proposal outside of the area that has been subject pre-determination trenched archaeological evaluation. i.e. if post-determination archaeological evaluation identified an area of sensitive archaeology and avoidance could achieve preservation in situ. There may be areas identified for preservation in situ during future archaeological works.</p>	<p>Paragraphs 3.1.2 and 3.1.3 of the OWSI (Document 7.10 (C)) notes that the project has already achieved preservation <i>in situ</i> through optioneering and embedded design measures. Section 3.2 of the OWSI confirms that there are no other locations proposed for preservation <i>in situ</i>.</p>
4.1.2	Targeted Archaeological OAE	<p>This section needs more detail on how the results of the fieldwork will lead into the production of the post excavation assessment report and updated project design (PXA/UPD) in Chapter 8. For further detail see comments for 5.1.1 – 5.1.5.</p>	<p>See the Applicant's comments in 5.1.1 – 5.1.5.</p>
4.1.2	Targeted Archaeological OAE	<p>This paragraph does not need the comparison to SMS. The comparison needs to be removed as the implementation time is not the difference between OAE and SMS.</p>	<p>The Applicant has removed the comparison to SMS in Section 5.1 of the OWSI (Document 7.10 (C)) in response to the Council's comments.</p>
4.2.1, 5.2.1 and 6.2.2	ATT	<p>SCCAS has only seen results of the trenched archaeological evaluation for stages 1-4 and has not seen the full results of the fieldwork. See comment for 1.5.1</p> <p>As there has only been low level of trenched archaeological evaluation within the undergrounding sections of the proposal, at a 2% sample, there is insufficient information to accurately define areas for archaeological mitigation where trenched archaeological evaluation has been undertaken. As a result, there is a need for further trenched archaeological evaluation to be undertaken post-determination for the areas that have not been trenched and in the areas that have been subject to pre-application trenched archaeological evaluation so the archaeological resource can be accurately quantified.</p>	<p>Please see Applicants Comments to 1.2.2, 7.14.3 and 7.14.5 above.</p>
4.2.1, 5.2.1 and 6.2.2	ATT	<p>The OWSI should therefore be a process document and should not contain details of defined areas for archaeological mitigation. Instead, the OWSI should state that there will be archaeological mitigation required to be undertaken prior to the construction phase, which would be defined in DWSI.</p>	<p>The Applicant has completed the ATT for the project and has now defined where it proposes archaeological mitigation in relation to the project. Therefore, the Applicant considers that it is helpful to include these locations in the OWSI.</p>
4.2.1, 5.2.1 and 6.2.2	ATT	<p>This section should also state that DWSI will need to be submitted to the LAAA for approval prior to fieldwork commencing and that no archaeological fieldwork can be undertaken without a DWSI that has been approved in writing by the relevant LAAA.</p>	<p>The OWSI (Document 7.10 (C)) already states in a number of places that DWSI would be produced and submitted to the relevant Local Authority Advisor for approval. This is also written into Requirement 6 (2) of the draft DCO [REP6-003], which states 'No stage of the authorised development may commence until a DWSI of areas of archaeological interest relevant to that stage (if any) as identified within the OWSI or identified through evaluation work as set out in the OWSI has been submitted to and approved by the County Archaeologist.' However, for clarity and in response to the Councils comments, 'approval' has also been added to the wording in paragraph 4.3.1, 5.3.1 and 6.3.1.</p>
4.3.1, 5.3.1, 6.3.1 and 7.3.1	DWSI	<p>This should state that each DWSI will need to be produced in line with a brief/s issued by the relevant LAAA. This paragraph needs to also state that each DWSI will need to be approved by the relevant LAAA prior to the commencement of archaeological fieldwork.</p>	<p>See the Applicant's response to 4.2.1, 5.2.1 and 6.2.2 above.</p> <p>Paragraph 2.2.2 of the OWSI already states that The Local Authority Advisors will be responsible for setting briefs or specifications to guide DWSI, where warranted.</p>
4.3.1, 5.3.1, 6.3.1 and 7.3.1	DWSI	<p>For sites in Suffolk, the DWSI will need to adhere SCCAS guidance for archaeological Excavation (2023). And should detail the requirements of fieldwork and set out a clear strategy for excavation, environmental sampling and recording of archaeology. This should also include post-excavation analysis, archiving and reporting.</p>	<p>The Applicant has updated paragraph 2.4.2 of the OWSI (Document 7.10 (C)) to state that the DWSI will include reference to relevant national and local professional guidance.</p> <p>Paragraph 4.3.1 of the OWSI (Document 7.10 (C)) already states that the DWSI will set out the strategy for excavation and details on environmental sampling. Chapter 8 and 9 of the OWSI include the details regarding post-excavation analysis, archiving and reporting.</p>

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
4.3.2	<u>Overburden removal</u>	<p><u>ClfA universal guidance for archaeological excavation has been updated (2023) More detail is needed in this section, the OWSI should inform the DWSIs of the baseline requirements of the archaeological methodology, which should include (but not limited to):</u></p> <p><u>Overburden removal – the method of overburden removal will be detailed in the archaeological contractors DWSI, which will include:</u></p> <ul style="list-style-type: none"> <u>Topsoil may be mechanically removed (unless otherwise agreed) using a machine of an appropriate size, with a backacting arm and fitted with a toothless ditching bucket, operated by a driver with suitable qualifications and experience. The machine strip will be to the interface layer between the topsoil and subsoil or archaeological horizon. All machine excavation is to be under the direct control and supervision of an experienced archaeologist.</u> <u>Topsoil, subsoil should be kept separate during removal to allow sequential backfilling of the excavation area, unless otherwise agreed with the developer.</u> <u>The DWSI will contain a detailed spoil management strategy including locations of topsoil and subsoil storage areas.</u> <u>All machinery is to be kept off of stripped areas until the archaeological excavations have been completed and area have been signed off in writing by the relevant LAAA.</u> 	<p><u>The Applicant considers that sufficient information is given regarding overburden removal for an outline document, leaving the details requested to be presented in the DWSI, as stated in paragraph 4.3.2 of the OWSI (Document 7.10 (C)).</u></p>
4.3.2	<u>Hand Excavation Policy</u>	<p><u>Hand Excavation Policy – The archaeological contractors DWSI will set out a detailed methodology for the identification of archaeology and excavation of archaeological features, deposits and stratified sequences. Additional details are provided in bullets in the Council's full response.</u></p>	<p><u>The Applicant considers that sufficient information is given regarding the hand excavation policy for an outline document, leaving the details requested to be presented in the DWSI, as stated in paragraph 4.3.2 of the OWSI (Document 7.10 (C)).</u></p>
4.3.2	<u>Human remains</u>	<p><u>The archaeological contractors DWSI will contain a detailed methodology for the excavation, recording and sampling of any human remains. Additional details are provided in bullets in the Council's full response.</u></p>	<p><u>The Applicant considers that sufficient information is given regarding the methodology for human remains for an outline document, leaving the details requested to be presented in the DWSI, as stated in paragraph 4.3.2 of the OWSI (Document 7.10 (C)).</u></p>
4.3.2	<u>Environmental Sampling policy</u>	<p><u>Techniques should follow guidance outlined in "Environmental Archaeology: A guide to the Theory and Practice of Methods, from Sampling and Recovery to Post-excavation (2011 Historic England) and other relevant guidance. Additional details are provided in bullets in the Council's full response.</u></p>	<p><u>The Applicant has amended paragraph 2.4.2 of the OWSI (Document 7.10 (C)) to state that the DWSI will include reference all national and local professional guidance.</u></p> <p><u>The Applicant considers that sufficient information is given regarding the sampling strategy for an outline document, leaving the details requested to be presented in the DWSI, as stated in paragraph 4.3.2 of the OWSI (Document 7.10 (C)).</u></p>
4.3.2	<u>Scientific Dating policy</u>	<p><u>Scientific dating will be utilised to provide spot dates to inform the excavation strategy, contribute to the understanding of stratigraphic sequences, or provide precision/resolution for statistical modelling. The archaeological contractors scientific dating specialist will provide advice and guidance throughout the project and should consult the Historic England Regional Science advisor. Scientific dating techniques. Additional details are provided in bullets in the Council's full response.</u></p>	<p><u>The Applicant considers that sufficient information is given regarding the sampling strategy (including scientific dating) for an outline document, leaving the details requested to be presented in the DWSI, as stated in paragraph 4.3.2 of the OWSI (Document 7.10 (C)).</u></p> <p><u>Historic England has said that it defers to the county archaeological advisors on archaeological matters, as recorded in line 2.4 in the Statement of Common Ground Historic England (Document 8.7.2 (B)).</u></p>
4.3.2	<u>Archaeological recording</u>	<p><u>The archaeological contractors DWSI will contain detailed methodologies for the production of hand-written and drawn records and photography in accordance with professional guidance and good practice. Additional details are provided in bullets in the Council's full response.</u></p>	<p><u>As stated in paragraph 4.3.2 of the OWSI (Document 7.10 (C)), the DWSI will contain detailed methodologies for the production of hand-written and drawn records and photography in accordance with current professional guidance and good practice. This detail is considered to be sufficient for the OWSI.</u></p>

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
<u>4.3.2</u>	<u>Artefact Policies</u>	<p>The retrieval, conservation and analysis of archaeological artefacts will be detailed in the archaeological contractors DWSI.</p> <ul style="list-style-type: none"> ● <u>All artefacts will be collected and bagged by context.</u> ● <u>All small finds will be GPS plotted so the find can be 3-Dimensionally located within its context and the site.</u> ● <u>Treasure will be reported to the LAAA immediately and the relevant county Finds Liaison Officer. The Archaeological Contractor will comply with the provisions of the Treasure Act. Findings will be reported to the Coroner within 14days.</u> ● <u>Findings that are suspected to contain preserved organic residues will not be cleaned in accordance with Historic England Guidance.</u> ● <u>Every effort must be made to get the agreement of the landowner to the deposition of the site archive, and transfer of title, with SCCAS County Store for sites in Suffolk. The intended depository should be clearly stated within the archaeological contractors DWSI.</u> 	<p><u>As stated in paragraph 4.3.2 of the OWSI (Document 7.10 (C)), the retrieval, conservation and analysis of archaeological artefacts will be detailed in the Archaeological Contractor's DWSI. The Applicant has made an amendment to the Artefact Policies bullet point in paragraph 4.3.2 of the OWSI (Document 7.10 (C)) to include reference to the treatment of small finds and treasure.</u></p>
<u>4.3.2</u>	<u>DWSI</u>	<p><u>As there are cremated human remains identified in the archaeological work undertaken so far. The OWSI should detail that there is a need for a scheme wide burial licence to be obtained prior to the commencement of archaeological works.</u></p>	<p><u>The Applicant has added text to paragraph 4.3.2 of the OWSI (Document 7.10 (C)) to refer to the need for a project-wide burial licence.</u></p>
<u>4.3.2</u>	<u>DWSI</u>	<p><u>Research objectives will need to be detailed in the DWSIs, and the excavation strategy will be kept under review.</u></p>	<p><u>Paragraph 2.4.3 of the OWSI (Document 7.10 (C)) states that the DWSI will include reference to the archaeological research objectives set out within the East of England Regional Research Framework where relevant.</u></p>
<u>5.1.1/5.1.2</u>	<u>SMS Excavation</u>	<p><u>This section should be called Strip, Map and Sample Excavation (SMS)</u></p>	<p><u>The Applicant has amended the title of Section 5.1 to 'Archaeological Strip, Map and Sample Excavation' of the OWSI (Document 7.10 (C)) in response to the Councils comments.</u></p>
<u>5.1.1/5.1.2</u>	<u>SMS Excavation</u>	<p><u>SMS is not a rapid form of excavation. This statement needs to be removed.</u> <u>SMS is both an evaluation and a mitigation technique, used to explore the spatial characteristics of archaeological features (such as fieldsystems), where the sample of features to be excavated will be determined by the LAAA following the submission of pre-excavation plans of stripped areas and initial site monitoring visits and results from initial excavation. Where areas of significant or complex archaeological remains are identified, the SMS methodology should be superseded with a targeted OAE methodology for more detailed excavation and recording.</u></p>	<p><u>The Applicant has amended paragraph 5.1.2 of the OWSI (Document 7.10 (C)) to clarify the nature of the mitigation summarised in response to the Councils comments.</u></p>
<u>5.1.1/5.1.2</u>	<u>SMS Excavation</u>	<p><u>The methodology will be the same as OAE, and the comments in 4.3.2 above are applicable here.</u></p>	<p><u>See comments to 4.3.2 above.</u></p>
<u>5.1.1/5.1.2</u>	<u>SMS Excavation</u>	<p><u>Any DWSI submitted for archaeological mitigation by SMS will need to have contingency to be upgraded to OAE. Timescales for SMS implementation is the same as OAE. If SMS is undertaken immediately prior to the commencement of groundworks, then there can be delays to project delivery.</u></p>	<p><u>The Applicant has amended paragraph 5.1.2 of the OWSI (Document 7.10 (C)) in response to the Councils comments to say that SMS may be upgraded to OAE where the archaeological resource warrants its implementation. Additional text has also been added to new paragraph (5.3.2) to say that the DWSI for each SMS area will have contingency included within the programme to develop the SMS into OAE should the archaeological resource warrant it.</u></p>
<u>5.1.1/5.1.2</u>	<u>SMS Excavation</u>	<p><u>As part of the SMS methodology this section should clearly state that pre-excavation plans will be sent to the LAAA for review and decisions on the sample excavation of archaeology will be determined by the LAAA.</u></p>	<p><u>Section 5.3 of the OWSI (Document 7.10 (C)) states that the Archaeological Contractor will produce a DWSI for areas of archaeology requiring SMS mitigation. These will be submitted to the Local Authority Advisors for comment and approval prior to the commencement of earthworks.</u></p>

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
5.1.1/5.1.2	SMS Excavation	The proportion of features excavated would be determined by the importance of the features and the requirements of the research objectives. The excavation strategy would need to be kept under constant review.	These details would be set out in the DWSI that would be submitted to the Local Authority Advisors for comment and approval prior to commencement.
5.1.1/5.1.2	SMS Excavation	SMS would need to reference SCCAS guidance for archaeological excavation (2023).	The Applicant has updated paragraph 2.4.2 of the OWSI (Document 7.10 (C)) to state that the DWSI will include reference to relevant national and local professional guidance in response to the Councils comments.
5.1.5	SMS Excavation	<p>There may be site specific variations to the methodology which should be detailed in the site specific DWSI.</p> <p>The sample excavation strategy will be reviewed continuously by LAAA archaeologists throughout the course of the fieldwork and, if necessary, amended in order to take account of changing circumstances and understanding. Any changes or amendments to the agreed strategy will be agreed in advance of the implementation with the LAAA archaeologists and confirmed in writing.</p> <p>Where areas of significant or complex archaeological remains are identified, the SMS methodology should be superseded with a targeted OAE methodology for more detailed excavation and recording. Alternatively, where the presence and significance of archaeological features is demonstrably low there could be a view to scale back the SMS methodology. This would only be undertaken in agreement with the relevant LAAA.</p> <p>Following the completion of the archaeological fieldwork, to the satisfaction of the relevant LAAA archaeologists, the relevant area, or agreed parts of area, will be released to the main contractor so that construction works may proceed.</p>	These details would be set out in the DWSI that would be submitted to the Local Authority Advisors for comment and approval prior to commencement. The Applicant has also added text to a new paragraph (5.3.2) to say 'The DWSI will include the Local Authority Advisor responsibility of agreeing 'sign-off' of particular SMS areas'.
6.1	Archaeological watching brief	ClfA have updated their terminology (2023) instead of "Watching Brief" this should be titled Archaeological Monitoring and Recording (AMR). This section will be referred to as AMR in my comments.	Please see the Applicants Comments on 7.14.14 above.
6.1	Archaeological watching brief	AMR should only be used to provide opportunities for archaeological investigation and recording in circumstances where OAE and SMS would otherwise be impracticable.	Paragraph 3.5.2 of the AFS [APP-186] sets out that an archaeological watching brief may be undertaken in areas where there is a low potential for significant archaeological remains to be present or where there is a limited potential for impacts on archaeological remains.
6.1.1/6.1.2	Archaeological watching brief	<p>There has not been a sufficient level of archaeological assessment to determine the level of archaeological mitigation within the underground cable trenches, pylon bases, temporary access routes, permanent access routes, laydown areas and construction compounds. There is a requirement further archaeological evaluation, which can be undertaken post-determination to determine appropriate levels of archaeological mitigation, and where AMR would be suitable. SCCAS will not agree to large areas of Archaeological Monitoring and Recording.</p> <p>This approach will cause delays to project delivery through the discovery of un-expected archaeological remains.</p> <p>An appropriate methodology to use on a scheme of this size should be archaeological evaluation (geophysics and trenched archaeological evaluation to a 4% sample) followed by appropriate levels of mitigation. This approach will cause delays to project delivery through the discovery of un-expected archaeological remains. An appropriate methodology to use on a scheme of this size should be archaeological evaluation (geophysics and trenched archaeological evaluation to a 4% sample) followed by appropriate levels of mitigation.</p>	<p>Please see the Applicants Comments on 1.2.2 above.</p> <p>The Applicant has undertaken ATT in the areas where there is the greatest risk to archaeology during construction, namely in the underground cable sections (excluding trenchless crossings), at the CSE compounds, GSP substation and at the main construction compound. It has also targeted buried anomalies detected through aerial interpretation and mapping (AIM) and geophysical survey, with additional trenches in areas of no anomalies to test for the presence of archaeological remains there.</p>

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
6.1.3 and 6.1.4	Archaeological watching brief	<p>In the bullet point:</p> <ul style="list-style-type: none"> To identify any areas requiring additional mitigation (e.g. SMS as described in Chapter 5). <p>This should read:</p> <ul style="list-style-type: none"> Where Archaeological Monitoring and Recording is implemented, and unexpected significant archaeological remains are identified, groundworks are to stop and the LAAA will be notified immediately, and amendments to the DWSI and mitigation methodology will be required (e.g. implementation of an OAE and/or SMS mitigation methodology as described in Chapters 4 and 5). <p>"The watching brief may therefore also feedback into other forms of mitigation in the event of as yet undiscovered archaeology warranting mitigation being found during construction."</p> <p>Should read:</p> <p>Where implemented, Archaeological Monitoring and Recording has the potential to identify archaeology that may require amendments to the DWSI and mitigation methodology. Where this is the case, construction works will need to stop until a mitigation strategy has been agreed and following completion of the archaeological fieldwork to the satisfaction of the LAAA in accordance with the DWSI and OWSI the area has been signed off in writing by the relevant LAAA.</p>	<p>The proposed wording from the councils creates duplication of text in the bullet and the following paragraph. However, in response to the Council's comments, the Applicant has amended the text paragraphs 6.1.3 and 6.1.4 of the OWSI (Document 7.10 (C)) as follows: '<u>Where unexpected significant archaeological remains are identified during the archaeological watching brief, groundworks will stop at that location and the Local Authority Advisor will be notified immediately. Amendments to the DWSI will be required and could include additional mitigation, such as the implementation of an OAE or SMS as described in Chapter 4 and 5. The updated DWSI and mitigation strategy will be approved by the Local Authority Advisor prior to the groundworks recommencing and the archaeological fieldwork will need to be completed to the satisfaction of the Local Authority Advisor before construction works can commence at that location.</u>'</p>
7.0	Geoarchaeological and Palaeoenvironmental Investigation and Mitigation	<p>This section needs to be called Geoarchaeological and Palaeoenvironmental Assessment and Mitigation</p>	<p>The Applicant has amended the title of Chapter 7 of the OWSI (Document 7.10 (C)) to 'Geoarchaeological and Palaeoenvironmental Investigation and Mitigation' to avoid any confusion with the desk-based assessment produced on behalf of the Applicant.</p>
7.2.2 and 7.2.4	Geoarchaeological and Palaeoenvironmental Investigation and Mitigation	<p>Geoarchaeological techniques will include; sediment description and interpretation to inform a programme of scientific dating (e.g. C-14 and OSL)</p> <p>Palaeoenvironmental Sampling for macrofossils and microfossils where appropriate</p> <p>Where peat deposits are identified a programme of investigation and sampling will be carried out to recover archaeological and palaeoenvironmental remains, which could be undertaken by test pitting in conjunction with coring and boreholes.</p> <p>There will need to be provision for C-14 dating of peat sequences.</p> <p>Any de-watering of the crossing would need to have suitable groundwater testing to determine damage to any potential waterlogged deposits, such a peats which are known to exist within the Stour River Valley from the 2013 borehole survey.</p> <p>Need to have consultation with Historic England Regional Science Advisor (East of England) Region.</p>	<p>Paragraph 7.1.2 sets out the objectives of the geoarchaeological and palaeoenvironmental mitigation, which include retrieving organic matter for environmental processing and scientific dating. The details would be included in the DWSI.</p> <p>Historic England has said that it defers to the county archaeological advisors on archaeological matters, as recorded in line 2.4 in the Statement of Common Ground Historic England (Document 8.7.2 (B)).</p>
8	Post Excavation Assessment (PXA) Report and Updated Project Design (UPD)	<p>This section needs to establish a clear timeframe for the delivery of the PXA/UPD following the completion of the archaeological fieldwork.</p>	<p>The Applicant has added additional text to paragraph 8.2.1 of the OWSI (Document 7.10 (C)) to say that the PXA Report will be completed within 12 months from the end of construction and will be submitted to the Local Authority Advisors for review and approval in response to the Councils comment.</p>

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
8	<u>PXA Report and UPD</u>	<u>The LAAA's will be provided with digital vector plans of excavation areas, recorded archaeological features and excavated sections, which should be provided as geo-referenced (EPSG:27700) ESRI shape or QGIS GPK files. These files should have the relevant attributes attached to them, including: HER Parish Code, Primary Reference Number (e.g. Section Number, Context Number, Sample Number, Small Find/Registered Artefact Number, etc), Group or Feature Number, Archaeological Period and Phases. These GIS files should be provided to the Suffolk HER following approval of the PXA/UPD.</u>	<u>The Applicant has added additional text to paragraph 8.2.1 of the OWSI (Document 7.10 (C)) to say that the PXA Report will be completed within 12 months from the end of construction and will be submitted to the Local Authority Advisors for review and approval in response to the Councils comment.</u> <u>The Applicant has added a new paragraph (8.2.3) to the OWSI (Document 7.10 (C)) to detail the digital file submissions required as part of the PXA Report in response to the Councils comment.</u>
8.1	<u>PXA Report and UPD</u>	<u>Standard abbreviation for the Post-Excavation Assessment Report should be PXA which is used by ClfA, planning and ALGAEO.</u>	<u>The Applicant has amended all references to the 'PEA Report' to 'PXA Report' in the OWSI (Document 7.10 (C)) in response to the Councils comment.</u>
8.1	<u>PXA Report and UPD</u>	<u>For Suffolk, approval of the PXA/UPD report will require an archive deposition form to be submitted to the SCCAS Archives Team.</u>	<u>The Applicant has added a new paragraph (9.1.1) to the OWSI (Document 7.10 (C)) which states that the Archaeological Contractor will complete archive deposition forms for each local authority area in response to the Councils comment.</u>
8.3.3	<u>UPD</u>	<u>The UPD will also need to include details on the publication, whether this will be published in a journal or a monograph as detailed in 8.5</u>	<u>Paragraph 8.3.4 of the OWSI (Document 7.10 (C)) has been amended to state that 'The UPD will include details relating to the publication of the results, whether this is in a regional archaeological journal or monograph' in response to the Councils comment.</u>
8.3.4	<u>UPD</u>	<u>This paragraph is not required, as this would be covered in the UPD once the results of the fieldwork have been assessed in the PXA.</u>	<u>The Applicant has deleted this paragraph from the OWSI (Document 7.10 (C)) in response to the Councils comment.</u>
8.4	<u>Post-Fieldwork Analysis Report / Archive Report</u>	<u>Following on from the PXA/UPD the "Post-fieldwork analysis report" should be titled Archive Report, which is used by ClfA, planning and ALGAEO</u>	<u>The Applicant has amended 'Post-Fieldwork Analysis Report' to 'Archive Report' through the OWSI (Document 7.10 (C)) in response to the Councils comment.</u>
8.4.2	<u>UPD timescales</u>	<u>The timescales provide in the UPD will need a point of discharge in the DCO wording.</u>	<u>Paragraph 8.3.2 of the OWSI (Document 7.10 (C)) states that the UPD will make provision for the analysis, publication, timeline and dissemination of results. The OWSI (Document 7.10 (C)) is secured under Requirement 6 of the draft DCO [REP6-003], therefore any commitments made in the OWSI (Document 7.10 (C)) are already secured in the draft DCO [REP6-003].</u>
8.4.5	<u>PXA Report and UPD</u>	<u>This section will need to state that a copy of the PXA/UPD, clearly marked draft, will be sent to the LAAA for review. The LAAA may require amendments to the document for approval and submission to the HER.</u>	<u>The Applicant has amended paragraph 8.4.5 of the OWSI (Document 7.10 (C)) to state that the draft Archive Report will be sent to the Local Authority Advisors for review.</u>
8.5.2	<u>Publication Report</u>	<u>The LAAA will need to review and approve the Publication report prior to submission to the publisher.</u>	<u>The Applicant has amended paragraph 8.5.2 of the OWSI (Document 7.10 (C)) to state that the Publication Report will be issued to the Local Authority Advisors for review prior to approval.</u>
8.6	<u>Outreach</u>	<u>The OWSI outreach provision needs more consideration.</u> <u>This should provide for a social media/media presence reporting the important discoveries, to reach a national audience. Series of publicly accessible talks, to local interest groups, such as schools, parish groups/councils discussing the excavations as they progress.</u> <u>Depending on results in the field, there may be scope to hold site tours to promote the archaeological work being undertaken for the project. Following the completion of the fieldwork there should be provision for a blog post on the Suffolk Heritage Explorer.</u>	<u>The Applicant has amended paragraph 8.6.1 of the OWSI (Document 7.10 (C)) to include reference to social media in relation to web-based initiatives.</u> <u>The Applicant has added a new paragraph (8.6.3) to the OWSI (Document 7.10 (C)) to state that outreach opportunities will be included in the DWSI.</u>
9	<u>Archiving</u>	<u>The PXA/UPD cannot be approved until project archiving has been secured. Details on this can be found in the SCCAS guidance on Archive Preparation and Deposition (2022).</u> <u>There is no provision for Digital Archive deposition. The OWSI should include a project digital management plan for the full site archive, and each DWSI will need to have individual data management plans. The OWSI and resulting DWSIs should also state proposals for the deposition of the digital archive</u>	<u>The Applicant has added a new paragraph (9.1.1) to the OWSI (Document 7.10 (C)) to state that the PXA Report and UPD will not be approved until project archiving has been secured. This includes the provision for digital archives, which will be part of the archive policy in the Archaeological Contractor's DWSI. This may include archiving with the Archaeological Data Service or similar provider. The Archaeological Contractor will complete archive deposition forms for each local authority area.</u>

<u>Ref</u>	<u>Matter</u>	<u>Submission from Interested Party</u>	<u>Applicant's Comments</u>
		relating to this scheme with the Archaeology Data Service, or similar digital archive repository, and allowance should be made for costs incurred to ensure proper deposition. Due to the size of the project costs for digital archiving will need to be agreed early on in the project work with Archaeology Data Service.	
9.1.1	Archiving	SCCAS Archive currently only accepts archives from Suffolk. Discussions would need to be had between the applicant and the SCCAS Archives Team whether an integrated archive could be accepted by the county store. The Suffolk archive will need to be deposited in the SCCAS County Store.	Paragraph 9.1.4 of the OWSI (Document 7.10 (C)) includes reference to the 'appropriate repository', which in this case will mean the correct archives in both Suffolk and Essex.

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