



Suffolk County Council (20041323)

**Comments on the Applicant's Response to
the OWSI Amendments**

Bramford to Twinstead (EN020002)

Deadline 8

9 February 2024

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Glossary of Acronyms

<i>BMSDC</i>	<i>Babergh Mid Suffolk District Council</i>
<i>DCO</i>	<i>Development Consent Orders</i>
<i>DVNLSVP</i>	<i>Dedham Vale National Landscape and Stour Valley Partnership</i>
<i>DWSI</i>	<i>Detailed Written Scheme of Investigation</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>EPS</i>	<i>Essex Place Services</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>ExQ</i>	<i>Examining Authority’s Written Questions</i>
<i>ISH</i>	<i>Issue Specific Hearing</i>
<i>LAAA</i>	<i>Local Authority Archaeological Advisor</i>
<i>LHA</i>	<i>Local Highway Authority</i>
<i>OWSI</i>	<i>Outline Written Scheme of Investigation</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SuDS</i>	<i>Sustainable Drainage Systems</i>

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

Purpose of this Submission

The purpose of this submission is to respond to the Applicant’s Outline Written Scheme of Investigation [REP7-013]. SCC provided comments on the OWSI at Deadline 7 [REP7-034], these were provided to the Applicant in-between Deadline 6 and 7 and thus the Applicant’s Deadline 7 OWSI [REP7-013] has responded to a number of these comments. Examination Library references are used throughout to assist readers.

Unfortunately, due to limited staff availability as a result of unforeseen circumstances, SCC has not been able to review the Applicant’s Response to Interested Party Comments on Management Plans [REP7-022] in respect of the Outline Written Scheme of Investigation.

1 Comments on Document 7.10 (C) Outline Written Scheme of Investigation (Tracked) [REP7-013]

- 1.1 SCC (Archaeological Services) notes that all the points raised by Braintree District Council relating to the Outline Written Scheme of Investigation, at Deadline 7 are applicable to Suffolk and for these reasons, SCCAS objects to the updated OWSI [REP7-013] and does not find the Applicant's Responses to Second Written Questions [REP7-025] satisfactory. The comments of Braintree District Council are duplicated within this document for the reader's clarity of SCC's position.
- 1.2 SCC (Archaeological Service) considers that the main issue is the formulation of an appropriate mitigation strategy in areas that have either received no former intrusive archaeological investigation and areas which have been subjected to a limited trial trench evaluation.
- 1.3 To add further detail, the applicant has only made a small quantity of the changes requested by SCC at Deadline 7 *Comments on the Outline Written Scheme of Investigation* [REP7-034].
- 1.4 In regard to the Applicant's Response to Second Written Questions [REP7-025], for question CM2.5.1, the information on archaeological mitigation strategies is not considered appropriate in terms of terminology and scope of mitigation methodologies, specifically SMS methodology, and is in conflict with the revised OWSI (document 7.10 (C)). In response to question HE2.8.2, the Applicant's timetable for the production of a report is not acceptable, for mitigation to be agreed in the areas covered by the report the report will need to be submitted before the OWSI can be agreed. Failing this the OWSI will be required to remove references to any areas that have been identified as not requiring further investigation.
- 1.5 A programme of targeted trial trench evaluation was carried out in November 2023. The results of these investigations have not been submitted in a report to the Local Authority archaeological advisor and the Applicant states that this report will not be provided until May 2024. The Examination ends on 12 March 2024. The last practical opportunity for SCC to comment on any new material will be at Deadline 9 on 23 February 2024 so SCC has to assume that the report will not be available for its comments before the close of the Examination. One area has been identified within the OWSI as requiring further investigation in the form of open area excavation however the remainder of the areas have been scoped out of the requirement for any further investigation. Until the trial trench evaluation report has been submitted and the results discussed with the Local Authority archaeological advisor then the mitigation strategy in these areas cannot be determined.

Document 7.10 (C) states that no further mitigation will be required in these areas however fails to provide any supporting evidence as to why these areas will be removed from scope.

- 1.6 Removing areas from further investigation without adequate supporting evidence is contrary to what is stated in Document 6.2.8 Environmental Statement Ch 8 Historic Environment Section 8.8.2 which states that “*a level of archaeological mitigation would be applied to all archaeological remains where removal or damage is unavoidable, whether significant or not, as per good practice*”.
- 1.7 The evaluations have been successful in determining that there does not appear to be any archaeological remains that would act as a constraint to the development however they were not carried out to an appropriate level to provide sufficient information on the nature, scale and complexity of any archaeological remains present.
- 1.8 A programme of archaeological evaluation will need to be completed across the scheme in areas where there is likely to be an impact on archaeological remains in order provide the Local Authority archaeological advisor sufficient data on which to formulate and come to agreement on, an adequate mitigation strategy.
- 1.9 Any areas where there may be impact to potential archaeological remains, including from temporary compounds, access roads, planting schemes etc. will require an archaeological evaluation in the first instance with an appropriate coverage of trial trenches and using more conventional trial trench methodologies which would allow for the recognition of features through weathering over a suitable time period. The methodology employed during the completed investigations have not been conducive to this.
- 1.10 A detailed strategy for post determination trenched archaeological evaluation will need to be included within the OWSI.
- 1.11 In addition, the area of the trenchless crossing should be subject to upfront geoarchaeological and palaeoenvironmental archaeological assessment, providing enhanced deposit models and palaeoenvironmental information in order to determine if sensitive deposits of archaeological importance would be damaged or destroyed by the proposed trenchless crossing and to allow the formulation of an appropriate mitigation strategy.
- 1.12 There remains considerable areas of concern within the OWSI and it is very important to have this document as detailed and accurate as possible as it will guide the whole archaeological programme.
- 1.13 For further information, identified in Table 1 are the issues were previously raised and have not been satisfied:

Table 1: SCC Table of Comments on the OWSI (Tracked) [REP7-013]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
1a	Introduction	Chapter 1 1.2.2, 1.2.6, 1.3.3, 1.5.1		Changes requested by in [REP7-034] Table items 1a, 1b, 1d, 1e, 1f and 1h have not been undertaken.
1b	Introduction - Purpose of the Report	1.2 1.2.6 – 1.2.7	<p>The OWSI builds on the results of the non-intrusive and intrusive archaeological investigations and desk-based assessment completed to date. This includes geophysical survey and trial trenching which has been carried out within the Order Limits, mainly in the underground cable sections.</p> <p>The field surveys were completed in November 2023 and have focused on the large areas of ground disturbance and topsoil stripping (underground cable sections, the main site compound, the grid supply point (GSP) substation and the cable sealing end (CSE) compounds) and anomalies identified in the AIM and geophysical surveys. This OWSI has been updated with results of this work. The detailed methodologies of the future mitigation are not set out in this document but will be set out within DWSI based on the assumptions provided in the AFS. The DWSI will be provided to the Local Authority Advisors for approval in</p>	The level of evaluation to date has been limited and further evaluation will be required post consent, especially in those areas not being undergrounded and where there are running tracks or access tracks.

			advance of each phase of field work.	
1c	Introduction - Aims and Objectives	1.3.3	<p>Archaeological mitigation is not proposed in the following areas (as shown on Figure 1: Proposed Archaeological Mitigation):</p> <ul style="list-style-type: none"> • Locations where the 132kV or 400kV overhead lines are to be removed. The works in these areas will be limited to the pylon bases, which would have disturbed the soil during construction; • Modification works to the existing 132kV or 400kV overhead line. There will be works to the pylons and conductors of the existing overhead lines and in some areas adding arcing horns to the existing pylons. It is not anticipated that these works would require ground disturbance; • Area subject to a trenchless crossing. Although the drill pits are anticipated to be subject to archaeological mitigation, the line of the trenchless crossing would not be. This is because the trenchless crossings have 	<p>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.</p>

			<p>been proposed in locations where the environment above the crossing is sensitive and the design has sought to avoid impacts to this area; and</p> <ul style="list-style-type: none"> • Environmental planting areas. Planting is proposed in a number of areas across the Order Limits including embedded planting around the CSE compounds and the GSP substation and additional mitigation planting to compensate for vegetation lost. 	
1d	Introduction - Structure of this Report	1.5.1	<p>General considerations in relation to archaeological mitigation are set out in Chapter 2 of this report. The report is then structured into four types of mitigation, all of which have been identified within the AFS. The approaches set out in this report would be used to mitigate adverse effects on archaeological remains during the construction and operational phases, namely:</p> <ul style="list-style-type: none"> • Retention in situ (Chapter 3) – This is where known archaeological remains are preserved in place wherever possible; 	<p>This section needs to include further evaluation work in those areas not evaluated to date.</p>

			<ul style="list-style-type: none"> • Targeted Archaeological Open Area Excavation (OAE) (Chapter 4) – This is a targeted programme of controlled, intrusive fieldwork with defined objectives which examines, records and interprets archaeological deposits, features and structures and, as appropriate, retrieves artefacts, ecofacts and other remains within a specified area or site. The records made and objects gathered during fieldwork are studied and the results of that study published in detail appropriate to the project design; • Archaeological Strip, Map and Sample (SMS) (Chapter 5) – This is where a suitably qualified archaeologist watches the removal of overburden material immediately (the ‘strip’) ahead of the construction works (the ‘strip’).. Any exposed features are ‘mapped’ and a ‘sample’ of the feature is excavated; and National Grid December 2023 January 2024 Bramford to Twinstead Reinforcement 4 	
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			<ul style="list-style-type: none"> Archaeological Watching Brief (Chapter 6) – This is where a programme of observation (monitoring) and investigation is carried out during intrusive ground works as part of the construction programme. It allows for the preservation through record of archaeological deposits which may be damaged or destroyed during the normal course of construction works. Watching briefs can be proactive (archaeological-led or supervised machine strip) or reactive (periodic inspection of groundworks underway). 	
1e	General Considerations	Chapter 2 2.2.2, 2.3, 2.3.2, 2.6		Changes requested by in [REP7-034] Table items 1j, 1k, 1l, and 1n have not been undertaken.
1f	Preservation <i>in situ</i>	Chapter 3 3.1.1, 3.2.1, 3.1.3, 3.2.1		Changes requested by in comment references 1o (in part), 1p, and 1q have not been undertaken.
1g	Targeted Archaeological Open Area Excavation	Chapter 4 4.1.2, 4.2.1, 4.3.1, 4.3.2		Changes requested by in [REP7-034] Table items 1r, 1s, 1t (in part), and 1u (in part) have not been undertaken.

1h	Archaeological Strip, Map and Sample Excavation	Chapter 5 5.1.1, 5.1.2, 5.1.5, 5.2.1, 5.3.1		Changes requested by in [REP7-034] Table items 1v (in part), 1w, 1x and 1y have not been undertaken.
1i	Archaeological Watching Brief	Chapter 6 6.1, 6.1.1, 6.1.2, 6.2.2, 6.3.1	<p>A watching brief (also known as Archaeological Monitoring and Recording) is defined here as the monitoring of groundworks undertaken by the Main Works Contractor during overburden stripping.</p> <p>Watching brief areas includes coverage of the excavation for underground cable trenches, pylon bases, temporary access routes, permanent access routes, laydown areas and construction compounds.</p>	<p>Should now be referred to as Archaeological Monitoring and Recording following the CiFA guidelines.</p> <p>A watching brief is not “<i>also known as Archaeological Monitoring and Recording</i>”. Watching brief is a redundant term and should not be used.</p> <p>Changes requested by in [REP7-034] Table items 1z, 1aa, 1dd and 1ee (in part) have not been undertaken.</p>
1j	Geoarchaeological and Palaeoenvironmental Investigation and Mitigation	Chapter 7 7.2.2, 7.2.4, 7.3.1		<p>Changes requested by in [REP7-034] Table items 1ff (other than the title), 1gg, 1hh and 1ii have not been undertaken.</p> <p>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 detailed WSI.</p> <p>In summary, there is concern regarding the level of archaeological field evaluation undertaken to date and the mitigation strategy proposed. The OWSI does not include any further archaeological trial trenching evaluation and has removed areas along the scheme from any further mitigation based on a limited programme of trial trenching. The results</p>

				of the trial trenching exercise have not been shared with the Local Authority Archaeological advisors and it is considered that there is not enough evidence to remove large areas of the scheme from further mitigation based on the levels of investigation carried out to date.
1k	Dissemination	Chapter 8 8.1, 8.4.2, 8.6		Changes requested by in [REP7-034] Table items 1kk (in part), 1oo and 1rr have not been undertaken.
1l	Archiving	Chapter 9 9.1.1		Changes requested by in [REP7-034] Table items 1ss (in part) and 1tt have not been undertaken.