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Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.3.6.1 (C): Statement of Common Ground Royal Society for the Protection of Birds (RSPB)

Final Issue C
February 2024

Planning Inspectorate Reference: EN020002

The Infrastructure Planning (Examination Procedure) Rules 2010
Regulation 8(1)(e)

Version History

Date	Issue	Status	Description / Changes
September 2023	A	Final	For Deadline 1.
February 2024	B	Final	Updates to sections of the Draft SoCG to reflect on-going discussions with the Consultee, for submission at Deadline 8.
February 2024	C	Final	Final submission for Deadline 9.

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1. Introduction

1.1 Overview

- 1.1.1 This document supports National Grid Electricity Transmission plc's (here on referred to as National Grid) application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex.
- 1.1.2 A Statement of Common Ground (SoCG) is a written statement produced as part of the application for development consent and is prepared jointly between the Applicant and the interested party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.3 The aim of a SoCG is to help the Examining Authority manage the examination phase of the application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning, and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during examination, and then updated as necessary or as requested during the examination phase.
- 1.1.4 This SoCG is between National Grid (the Applicant) and the Royal Society for the Protection of Birds (the RSPB) relating to the application for development consent for the Bramford to Twinstead reinforcement ('the project'). This SoCG has been prepared in accordance with the guidance for the examination of applications for development consent for Nationally Significant Infrastructure Projects (NSIP) (Planning Act 2008) published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).
- 1.1.5 This SoCG has been prepared to identify matters between National Grid and the RSPB in respect to the Bramford to Twinstead reinforcement only. The SoCG will evolve as the application progresses through examination.

1.2 Description of the Project

- 1.2.1 This document supports National Grid's application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex. This would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km. The project meets the threshold as a NSIP, as defined under Part 3 of the Planning Act 2008, hence National Grid requires a development consent order (DCO).
- 1.2.2 The reinforcement would comprise approximately 18km of overhead line (consisting of approximately 50 new pylons, and conductors) and 11km of underground cable system (with associated joint bays and above ground link pillars).
- 1.2.3 Four cable sealing end (CSE) compounds would be required to facilitate the transition between the overhead and underground cable technology. The CSE would be within a fenced compound, and contain electrical equipment, support structures, control building and a permanent access track.

- 1.2.4 Approximately 27km of existing overhead line and associated pylons would be removed as part of the proposals (25km of existing 132kV overhead line between Burstall Bridge and Twinstead Tee, and 2km of the existing 400kV overhead line to the south of Twinstead Tee). To facilitate the overhead line removal, a new grid supply point (GSP) substation is required at Butler's Wood, east of Wickham St Paul, in Essex. The GSP substation would include associated works, including replacement pylons and underground cables to tie the substation into the existing 400kV and 132kV networks.
- 1.2.5 Other ancillary activities would be required to facilitate construction and operation of the project, including (but not limited to):
- Modifications to, and realignment of sections of existing overhead lines, including pylons;
 - Temporary land to facilitate construction activities including temporary amendments to the public highway, public rights of way, working areas for construction equipment and machinery, site offices, welfare, storage and access;
 - Temporary infrastructure to facilitate construction activities such as amendments to the highway, pylons and overhead line diversions, scaffolding to safeguard existing crossings and watercourse crossings;
 - Diversion of third-party assets and land drainage from the construction and operational footprint; and
 - Land required for mitigation, compensation and enhancement of the environment as a result of the environmental assessment process, and National Grid's commitments to Biodiversity Net Gain (BNG).

1.3 This Statement of Common Ground

- 1.3.1 For the purpose of this SoCG, National Grid and the RSPB will jointly be referred to as the 'Parties'.
- 1.3.2 This SoCG focuses on the concerns of the RSPB and is based on points raised in the RSPB's Relevant Representation to the Examination [RR-043], received by the Planning Inspectorate on 18 July 2023. Any matter not covered in this SoCG should not be taken to indicate the RSPB's agreement on that matter or prevent the RSPB from making further representations as may be necessary, based on new information or submissions made by National Grid to the Examination. The RSPB is focusing on its key areas of concern around RSPB Wolves Wood Reserves/Hintlesham Woods Site of Special Scientific Interest (SSSI) and is not considering or reviewing all aspects of the project.
- 1.3.3 Throughout the SoCG:
- Where a section begins 'Matters Agreed', this sets out matters that have been agreed between the Parties and where there is no dispute;
 - Where a section begins 'Matters Not Agreed', this sets out matters that are not agreed between the Parties and where a difference of opinion remains; and
 - Where a section begins 'Matters Under Discussion', this sets out matters that are subject to further negotiation between the Parties.
- 1.3.4 This SoCG is structured as follows:

- Section 1 provides an introduction to this SoCG and a description of its purpose;
- Section 2 states the role of the RSPB in the DCO application process and details engagement undertaken between the Parties;
- Section 3 sets out matters agreed between the Parties;
- Section 4 sets out matters not agreed between the Parties; and
- Section 5 includes the signing off sheet.

1.3.5 There are no remaining matters under discussion.

2. Record of Engagement

2.1 Role of the RSPB in the Process

- 2.1.1 The Royal Society for the Protection of Birds (registered Charity England and Wales number 207076, Scotland number SC037654, ‘the RSPB’) was set up in 1889. It is a registered charity incorporated by Royal Charter and is Europe's largest wildlife conservation organisation, with a membership of 1.15 million (RSPB Annual Report 2021-22). The RSPB manages 222 nature reserves in the UK covering an area of 159,000 hectares.
- 2.1.2 The principal objective of the RSPB is the conservation of wild birds and their habitats. The RSPB therefore attaches great importance to all international, European Union and national law, policy and guidance that assist in the attainment of this objective. It campaigns throughout the UK and internationally for the development, strengthening and enforcement of such law and policy. In so doing, it also plays an active role in the domestic processes by which development plans and proposals are scrutinised and considered, offering ornithological and other wider environmental expertise. This includes making representations to, and appearing at, public inquiries and hearings during the examination of applications for development consent.
- 2.1.3 The RSPB is the landowner and reserve manager at Hintlesham Woods SSSI and also own associated land at Wolves Wood (also part of the SSSI designation).

2.2 Summary of Pre-application Discussions

- 2.2.1 Pre-application discussions were held with the RSPB between 2009 and 2013 prior to project pause. A summary of these discussions can be found in options appraisal reporting, such as the Connections Option Report [APP-164]. Due to the lapse in time since these original discussions took place and as key staff may have changed, the SoCG only records the meetings and matters agreed since the project restarted.
- 2.2.2 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the application.

Table 2.1 – Pre-application Discussions

Date	Topic	Discussion Points
13 March 2021	Launch of Non-Statutory Consultation	National Grid wrote to the RSPB as they are a prescribed consultee in the DCO process, informing them of the start of the non-statutory consultation and inviting their views. The non-statutory consultation was held for six weeks, between 25 March 2021 and 6 May 2021.
23 June 2021	Introduction to the project and meeting about Hintlesham Woods (joint meeting with Natural England)	National Grid introduced the project and outlined the work previously undertaken (pre project pause in 2013) in relation to the options appraisal process including the routes around Hintlesham Woods.
3 September 2021	Landowner meeting	Meeting between the Parties to discuss the Licence agreement for the dormouse surveys. The terms were agreed on the call.

Date	Topic	Discussion Points
8 September 2021	Ecology Meeting	Thematic National Grid provided a project update and technical discussions around surveys, Biodiversity Net Gain (BNG) and the Habitat Regulation Assessment (HRA).
11 November 2021	Hintlesham Woods Meeting (joint meeting with Natural England)	National Grid and RSPB discussed the proposals at Hintlesham Woods including the two options that will be presented at Statutory Consultation.
25 November 2021	BNG	National Grid presented the enhancement proposals to an environmental working group to seek feedback on the options proposed.
19 January 2022	Launch of the Statutory Consultation	National Grid wrote to the RSPB as they are a prescribed consultee in the DCO process, informing them of the start of the statutory consultation and inviting their views. The Statutory Consultation was held for a period of eight weeks between 25 January 2022 and 21 March 2022 and provided the opportunity for the public and stakeholders to see how the project has evolved since the non-statutory consultation, and comment on further detailed engineering design and environmental assessment work.
26 January 2022	Landowner email	Email correspondence sent from National Grid with regards to the ground-based bat roost surveys.
17 March 2022	Bird surveys	National Grid provided the RSPB with a description of the bird survey scope in an email.
21 March 2022	Response to Statutory Consultation	The RSPB provided their response to the Statutory Consultation.
28 March 2022	Landowner meeting	Meeting between the Parties to discuss the Licence agreement for the breeding bird surveys. The terms were agreed on the call.
30 March 2022	Ecology Meeting	Thematic National Grid provided a project update and technical discussions around surveys and BNG.
04 April 2022	Landowner meeting	Meeting between the Parties to discuss the Licence agreement for the badger surveys. The terms were agreed on the call.
05 April 2022	Bat survey	The RSPB provided National Grid with a copy of a 2012 report on bat activity surveys at Hintlesham Woods.
25 April 2022	Bird surveys	The RSPB confirmed in an email that they were generally supportive of the proposed method for the breeding bird survey at Hintlesham Woods but has questions about the output.
27 April 2022	Bird surveys	National Grid responded to the RSPB in an email about the clarifications on the bird surveys at Hintlesham Woods.
16 May 2022	Landowner meeting	Meeting between the Parties to discuss the Licence agreement for the bat surveys. The terms were agreed on the call and payment was made.
18th May 2022	Landowner email	The RSPB signed the Intrusive Access Licence for the ground investigation work. National Grid confirmed that it would seek Natural England consent (if required) and evidence of that will be provided to the RSPB in advance. National Grid would communicate with the RSPB regarding site access in advance of the works.
1 September 2022	Launch of the targeted consultation	National Grid wrote to the RSPB as they are a prescribed consultee in the DCO process, informing them of the start of the targeted consultation and inviting their views, which ran between 8 September 2022 and 19 October 2022, with a focus on the western part of the Stour Valley.

Date	Topic		Discussion Points
6 September 2022	Ecology Meeting	Thematic	National Grid provided a project update and technical discussions around surveys, BNG and targeted consultation.
17 October 2022	Hintlesham (joint with England and Suffolk County Council)	Woods Natural England and Suffolk County Council)	Meeting to discuss Hintlesham Woods options and barbastelle bats.
17 October 2022	Response to Consultation	Targeted	The RSPB provided their response to the Targeted Consultation.
31 January 2023	Landowner email		National Grid provided a copy of the Heads of Terms to the RSPB for a voluntary grant of overhead rights.
02 February 2023	Update meeting		National Grid provided a project update and technical discussions around the decision to remove Option 2 from the application.

2.3 Summary of Post-submission Discussions

2.3.1 Table 2.2 summarises the consultation and engagement that has taken place between the Parties post submission of the application.

Table 2.2 – Post-submission Discussions

Date	Topic		Discussion Points
25 April 2023	Heads of Terms		The RSPB requested clarification of the rights required and a response was provided by National Grid.
22 June 2023	Project meeting	update	National Grid provided a technical update on the project. The RSPB had some questions about the proposal. The Parties agreed to meet on site to discuss the proposals in further detail. The site visit was arranged for 4 July 2023.
30 June 2023	Landowner email		The RSPB set revised Heads of Terms to National Grid.
30 June 2023	Landowner email		National Grid responded to the RSPB's proposals on the Heads of Terms with an explanation of the proposals and the suggested drafting.
04 July 2023	Landowner site visit		National Grid met the RSPB on site to discuss the proposed works on their land and to discuss the Head of Terms.
05 July 2023	Bird data		National Grid provided the RSPB with data from the bird surveys undertaken in and around Hintlesham Woods.
18 July 2023	Relevant representation		The RSPB submitted a copy of their Relevant Representation to National Grid.
8 August 2023	Landowner email		The RSPB received revised Heads of Terms from National Grid.
30 November 2023	Meeting		National Grid met the RSPB to discuss matters outstanding in the Statement of Common Ground
10 January 2024	Meeting		National Grid met the RSPB to discuss matters regarding management of the existing swathe in Hintlesham Woods
14 February 2024	Meeting		National Grid met the RSPB and Natural England regarding noise management measures at Hintlesham Woods

3. Matters Agreed

Table 3.1 – Matters Agreed

SoCG ID	Matter	Agreed Position	Date Agreed
3.1 The Project			
3.1.1	RSPB Engagement	The project's approach to engagement and consultation has been proactive and professional.	11/09/23
3.1.2	Option 2 at Hintlesham Woods	The RSPB supports the decision by National Grid to not take forward Option 2 (as per the Statutory Consultation material) as part of the application for development consent because removal of Option 2 avoids direct impacts on further ancient woodland habitat of Hintlesham Woods SSSI.	11/09/23
3.2 Assessment Approach and Methodology			
3.2.1	Baseline environment	The study areas used for the ornithology baseline data collection at Hintlesham Woods as presented within the Environmental Statement (ES) are suitable and the scope and detail of the information included in the application is sufficient.	11/09/23
3.2.2	Scope of biodiversity assessment	The bird surveys at Hintlesham Woods have focused on and identified appropriate species and areas of importance.	11/09/23
3.2.3	Construction noise assessment methods	To assess impacts of the construction of pylon RB12T on breeding birds, noise assessments should be based on peak, rather than average, noise levels as impulsive noise is likely to have the greatest impact. The RSPB therefore welcome the Applicant's revision to the assessment in the Technical Note on Noise Levels at Hintlesham Woods [REP3-057] to incorporate peak noise levels.	10/01/24
3.2.4	Vegetation management/ coppicing of existing swathe within Hintlesham Woods	<p>Some details of working methods and measures to manage impacts of any vegetation clearance/ coppicing required within the existing swathe have been agreed. These include a provision around demarcation of the existing swathe during the construction period (measure EM-AB17 which was included in the Register of Environmental Actions and Commitments (REAC) at Deadline 6 [REP6-023]).</p> <p>We have also discussed and agreed measures that will be included in the revised LEMP at Deadline 9. These relate to:</p> <ul style="list-style-type: none"> • The definition of coppicing (stools cut to a height of 3-10cm) (added at paragraph 7.2.2 of the LEMP); • Use of brash obtained from the on-site swathe for stool protection from deer browsing (added at paragraph 8.4.2 of the LEMP); and • A requirement for pre-construction walkover surveys at Hintlesham Woods to include an RSPB staff member (added at paragraph 2.5.6 of the LEMP). 	29/01/24
3.2.5	Surveys at Hintlesham Woods	No further intrusive or non-intrusive surveys are currently planned at Hintlesham Woods SSSI in relation to the construction of the project. If further surveys were required, the Applicant would submit details of the surveys (survey type, method, timings and details of relevant consents obtained by National Grid) to RSPB as the landowner and site manager.	29/01/24

SoCG ID	Matter	Agreed Position	Date Agreed
		This information will also be provided to RSPB in relation to pre-construction surveys.	
3.3 Environmental Impact Assessment			
3.3.1	Impacts on Ancient Woodland at Hintlesham Woods	The RSPB welcomes the commitment and clarification in paragraphs 2.1.4 and 2.2.9 of the Technical Note on Ancient Woodland [REP3-046] that no excavation is permitted within the 15m buffer around Hintlesham Little Wood, and the restriction on the use of the temporary access route adjacent to Keeble's Grove added to the REAC as EM-AB16. We also note our agreement with the requirements that construction of the line to the north and west of Ramsey Woods takes place outside the bird breeding season (except for those activities which must take place during outages) and that no intrusive works can take place within 15m of the woodland in this area (with the exception of mitigation planting).	29/01/24
3.3.2	Noise impacts on breeding Nightingale at Hintlesham Woods during construction	The RSPB welcome the additional commitments (subject to their inclusion in the updated REAC at Deadline 9) around noise monitoring and mitigation at Hintlesham Woods relating to construction of pylon RB11 (updated following programme changes - previously RB12T). These commitments are: <ul style="list-style-type: none"> • Construction of pylons 4YL011 to 4YL017A outside the bird breeding season (with some exceptions where work is required during outages) (EM-AB09); • Not to use percussive piling in the construction of the foundations for pylon RB11 (EM-AB14); • Monitoring of construction noise levels at Hintlesham Woods during bird breeding season (EM-AB20); • Surveys at Hintlesham Woods SSSI of Schedule 1 breeding birds and Nightingale pre-construction, during construction and one year after construction (EM-AB19); • A Hintlesham Woods SSSI Construction Noise Monitoring Plan to be produced prior to commencement for activities taking place within bird breeding season. The Noise Monitoring Plan will include details of the noise monitoring to be undertaken (including location of monitoring equipment, frequency of noise peaks and duration) and additional mitigation that would be implemented should noise levels exceed 70dB during works at RB11 (EM-AB20). 	16/02/24
3.4 Habitat Mitigation Proposals			
3.5.1	Natural regeneration	The RSPB support the proposals to allow natural regeneration of woodland where appropriate in the habitat mitigation areas around Hintlesham Woods. (see also 5.4.1 below).	11/09/23
3.5.2	Proposals	That the broad locations proposed for habitat mitigation in the vicinity of Hintlesham Woods are suitable.	11/09/23
3.5.3	Aftercare	We understand that DCO Requirement 9 will be updated at Deadline 8 to indicate that the requirement for management plans for reinstatement planting will also apply to mitigation areas. We have reached agreement on this point, subject to this inclusion.	06/02/24

SoCG ID	Matter	Agreed Position	Date Agreed
5.4.1	Management and aftercare	Aftercare of mitigation area MM09 should be for a minimum of 30 years to ensure that its ecological objectives are met. National Grid is seeking the land rights to the mitigation area to the north of Ramsey Wood (MM09) for 30 years and would implement and maintain this area over this time period.	07/02/24
3.5 Biodiversity Net Gain (BNG)			
3.4.1	Principle	The RSPB support the commitment to a voluntary 10% BNG for this project.	11/09/23
3.4.2	Proposals	That the broad locations proposed for BNG in the vicinity (but outside the protected areas) of Hintlesham Woods are suitable.	11/09/23
3.4.3	Management and aftercare of BNG	Aftercare of areas contributing to BNG should be for a minimum of 30 years. National Grid will update the REAC (document 7.5.2) at Deadline 8 to say: <i>'The project has committed to deliver net gain by at least 10% or greater in environmental value (including biodiversity) on this project. National Grid will produce a management plan for the biodiversity net gain areas which will set out the proposals for each site and the intended habitat targets.'</i> As BNG is currently not mandatory on Nationally Significant Infrastructure Projects, National Grid has requested the land rights for the environmental enhancement areas for a 30-year period. National Grid is also seeking voluntary land rights with the relevant landowners for this period.	11/09/23

4. Matters Not Agreed

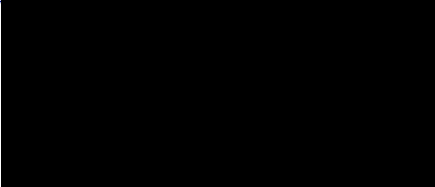
Table 4.1 – Matters Not Agreed

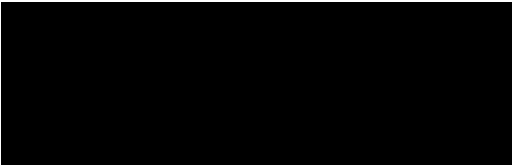
SoCG ID	Matter	The RSPB Position	National Grid's Position
4.3 Environmental Impact Assessment			
4.3.1	SSSI embedded measures	The RSPB agree with the point originally raised by Natural England (on p49 of its Relevant Representations [RR-042]) that the proposed embedded measures need to be legally secured by being within the DCO, not via an associated document (the Landscape and Ecological Management Plan (LEMP) and Construction Environmental Management Plan (CEMP)) that can be more easily changed than DCO conditions. Therefore, the required embedded measures should be set out and included within Requirement 4 of the DCO.	The embedded mitigation is contained within the REAC (document 7.5.2), which is secured through Requirement 4 of the DCO. National Grid therefore does not consider it practical or necessary to duplicate this requirement and list all of the many embedded measures as line items in the Requirement wording.
4.3.2	No construction phase or post-construction vegetation monitoring proposed for Hintlesham Woods SSSI.	<p>Tree health at Hintlesham Woods SSSI (including to the north and west of the woods and along the existing maintained swathe) should be monitored during construction and for an agreed period post-construction.</p> <p>This should be targeted at any impacts resulting from working close to root zones, dust generation and to allow early detection of any introduction of invasive non-native species (INNS). This would also allow some assessment of the effectiveness of the mitigation aimed at addressing these. Impacts on tree health might not be apparent immediately after construction.</p> <p>As well as the monitoring potentially identifying targeted management needed at this site, this project could also contribute usefully to the wider understanding of construction impacts on ancient woodland and how they are best mitigated, informing the design of future projects.</p>	<p>There would be no direct impact on woodland to the north and west of Hintlesham Woods SSSI due to embedded measures that would avoid disturbance of the root protection area. The ES concludes that with the good practice measures in place that there would be no significant secondary effects in relation to dust and INNS. In terms of the managed swathe beneath the overhead line, this would be left to regenerate as per the existing maintenance regime. Therefore, National Grid does not consider that monitoring is required at Hintlesham Woods SSSI.</p> <p>The LEMP (document 7.8) includes inspections as part of the five year monitoring and aftercare period to check that planting is re-establishing following construction.</p> <p>Monitoring would also be undertaken where identified in the final protected species licences agreed with Natural England.</p>
4.3.3	Vegetation management of existing maintained swathe within Hintlesham Woods and Southern access track	Details of the management techniques proposed to produce and maintain the graduated swathe (through either graduated cutting heights or varying the lengths of coppice rotations) have not yet been provided. RSPB has stated our preference for varied lengths of coppice rotations in our response to the First Written Questions [REP3-077]. RSPB note	National Grid has not yet appointed a main works contractor and therefore cannot confirm the method that would be used for vegetation management within the existing maintained swathe at Hintlesham Woods SSSI for construction during Examination. However, the Applicant has agreed to provide the methodology to RSPB when available. This is secured through a new commitment (EM-AB18) which has been added to the REAC at

SoCG ID	Matter	The RSPB Position	National Grid's Position
	during construction	<p>that it is proposed to inform RSPB of the chosen method once a main works contractor has been appointed but consider that the method should be agreed between RSPB, Natural England and National Grid.</p> <p>Details of construction related vegetation management required at the northern end of the access track to the South of Hintlesham Woods (noting importance of the hedgerow and trees along this route) and measures to manage impacts of such works should be agreed.</p>	<p>Deadline 8 (document 7.5.2) which states that <i>'The contractor will produce a method statement describing how the vegetation clearance would be undertaken at Hintlesham Woods SSSI. This will be submitted to RSPB (as landowner and manager of the reserve) for information in advance of the vegetation clearance taking place.'</i></p> <p>In addition, National Grid has also committed to works being confirmed to the existing maintained swathe. EM-AB17 states that <i>'The Order Limits at Hintlesham Woods will be demarcated so that construction activities do not stray beyond the maintained swathe which is the same as the vegetation management that took place during the 2013 re-conductoring works energisation.'</i> Therefore, the only vegetation affected, would be that which is already managed as part of the operational overhead line. The minimum clearance for 400kV conductors at the point of energisation is 5.2m plus three-years of vegetation growth from the conductor swing at blow out conditions on the hottest / windiest day.</p> <p>Sheet 06 and 08 of the General Arrangement Plans [APP-018] show that the temporary access route is in the field to the west of the SSSI. The LEMP (document 7.8) and Appendix A: Vegetation Retention and Removal Plan of the LEMP (document 7.8.1) sets out the proposed vegetation management required.</p>
4.3.4	Method statements for construction works at Hintlesham Woods including conductor restringing and works to pylon RB13	<p>The RSPB has requested details of construction working methods and agreement of measures to manage impacts (noting that some works are planned during the bird breeding season). The RSPB understand that it will be informed of these measures once a main works contractor has been appointed.</p>	<p>ES Appendix 7.1 Annex B: Hintlesham Woods SSSI Assessment [APP-111] describes the proposed working methods to manage the effects around Hintlesham Woods. The Management Plans secured through Requirement 4 of the draft DCO include the measures that would be implemented to avoid impacts, including to nesting birds.</p> <p>As per commitment EM-AB02, the Applicant will reuse the existing pylon RB13. Construction activities will follow the National Grid technical and safety specifications and processes for works to existing overhead lines.</p> <p>The working method for re-stringing conductors and any repairs (if required) to RB13 would follow standard National Grid processes and a similar working method to that used for the re-conductoring work in 2013. National Grid does not consider it to be appropriate for RSPB to input on the required technical methodology undertaken by specialist contractors, where they have a legal responsibility to do the works safely.</p>

SoCG ID	Matter	The RSPB Position	National Grid's Position
4.3.5	Vegetation management of Hintlesham Woods existing swathe	<p>The proposed use of woodchip obtained from vegetation cleared from the same location for protection of stools should vehicle access be required remains under discussion due to concerns around the approach should material obtained from within the swathe be of insufficient quantity. Whilst the RSPB are content with use of material from within the swathe, it would be concerned if it was proposed to import additional material from elsewhere.</p>	<p>The Applicant will add wording to the LEMP at Deadline 9 to say that 'where present, coppiced stools will be protected from vehicle access during construction by using woodchip obtained from vegetation cleared from the same location to provide a flat ground level to support the protective matting. Supplementary woodchip may be required at some locations depending on the amount of vegetation cleared'. The Applicant needs to retain the last sentence, as this statement applies to all areas of woodland and trees (not just Hintlesham Woods SSSI) and there may not be sufficient woodchip sourced on site to protect the coppiced stools.</p> <p>The Applicant has agreed to provide the methodology for the vegetation management to RSPB when available. This is secured through a new commitment (EM-AB18) which has been added to the REAC at Deadline 8 (document 7.5.2) which states that '<i>The contractor will produce a method statement describing how the vegetation clearance would be undertaken at Hintlesham Woods SSSI. This will be submitted to RSPB (as landowner and manager of the reserve) for information in advance of the vegetation clearance taking place.</i>'</p>

5. Approvals

On Behalf of	National Grid
Name	Sally Rotherham
Position	Consents Officer
Date	16 February 2024
Signed	

On Behalf of	The Royal Society for the Protection of Birds
Name	Rosie Sutherland
Position	Head of Environmental Law and In House Solicitor.
Date	16 February 2024
Signed	

Reference List

Department for Communities and Local Government (2015) *Planning Act 2008: Guidance for the examination of applications for development consent*. March 2015 (Department for Communities and Local Government, 2015)

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