



## **Suffolk County Council (20041323)**

Comments on any other submissions received  
at Deadline 9

## **Bramford to Twinstead (EN020002)**

Deadline 10

11 March 2024

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## Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Orders</i>
<i>DVNLSP</i>	<i>Dedham Vale National Landscape and Stour Valley Partnership</i>
<i>EIA</i>	<i>Environmental Impact Assessment</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>LHA</i>	<i>Local Highway Authority</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>SuDS</i>	<i>Sustainable Drainage Systems</i>
<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.</i>	

## Purpose of this Submission

The purpose of this submission is to provide responses to the Applicant’s Deadline 9 (D9) submissions and representations made by other interested parties at D9, as appropriate. Examination Library references are used throughout to assist readers.

# 1 Comments on any other submissions received at Deadline 9

## 5.10 (C) Arboricultural Impact assessment (Tracked) [REP9-019]

Table 1: SCC Table of Comments on 5.10 (C) Arboricultural Impact assessment (Tracked) [REP9-019]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
1a	Update to Tree Survey			<p>SCC (Landscape) welcomes the inclusion of tree T633-T669 at Rose Cottage, Burstall, and T670-T680 in the Brett Valley.</p> <p>There remain however concerns with regards to the completeness and accuracy of the project wide tree survey, for example at</p> <ul style="list-style-type: none"> <li>G1339, Sheet 07 of the Arboricultural Survey is listed as Category B Group, despite containing several mature specimen oaks. Despite being Category B, the group is not listed in Table A2 – Tree Group Data (or not referenced on the plan). For reference, this corresponds with location E-DAP4, Sheet 15 of the Access, Rights of Way and Public Rights of Navigation Plans [APP-012], where a proposed temporary access route leads along a densely vegetated track. SCC considers that the significance of the potential impacts on these trees in this area are not fully captured, that impacts are avoidable and should be avoided by using the cable corridor a haul route.</li> <li>West of Lower Layham, Sheet 5 of the Arboricultural Survey, vegetation, including a specimen oak tree, still appears to be missing, at the point where an access is created from Rands Road into a field (south-east from T145).</li> <li>G1582, Sheet 9 of the Arboricultural Survey, a group of semi-mature to mature trees. For information, this is west of G-AP1/P-G-1, Sheets 17 and 19 of the Access, Rights of Way and Public</li> </ul>

				<p>Rights of Navigation Plans <b>[APP-012]</b>; SCC (Landscape) considers the proposal to have a temporary access route along PRowS W-171/002/X and W-113/001/0 unacceptable in landscape terms and is of the view that this route should be removed from the proposals. SCC considers that the potential impacts on the trees (a large group of which is under Tree Preservation Order) and other vegetation along this route are avoidable and should be avoided. SCC suggests creating a temporary access route along the field edge and avoiding any impacts on existing vegetation.</p>
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## 7.5.1 (D) CEMP Appendix A Code of Construction Practice (Tracked) [REP9-036]

<b>Table 2: SCC Table of Comments on 7.5.1 (D) CEMP Appendix A Code of Construction Practice (Tracked) [REP9-036]</b>				
<b>Ref</b>	<b>Topic</b>	<b>Ref No.</b>	<b>Summary of Comments</b>	<b>SCC's Comments</b>
2a	Landscape and Visual	LV04	A representative from the relevant planning authority will be present at the final inspection of reinstatement and mitigation planting prior to handover to the landowner, unless agreed otherwise with the relevant planning authority. Where applicable, remedial measures will be agreed between the Applicant and relevant planning authority during the site visit in accordance with the Development Consent Order.	<p>SCC (Landscape) considers that this provision is insufficient and that it is necessary that the relevant planning authority is involved in annual site inspections, to a) ascertain that necessary replacement planting is carried out at the earliest opportunity (i.e. the first planting season after the plant has failed) and b) to agree any variations in replacement planting that may become necessary.</p> <p>There should also be an inspection of the final replacement planting prior to, or as part of, the handover, as per the previous iteration of the LEMP at paragraph 9.1.6.</p> <p>Local authorities are effectively responsible for monitoring the implementation of the scheme as consented by the Secretary of State, and ensuring, on behalf of local communities &amp; local taxpayers, that, in practice, rather than just on paper, the impacts of the scheme are effectively and robustly mitigated.</p>
2b	Landscape and Visual	LV05	The results of baseline vegetation surveys and post-construction vegetation (aftercare monitoring) surveys will be	SCC (Landscape) welcomes this additional commitment by the Applicant but considers that while this provides important information to the relevant planning authority, it does not give the relevant planning authority any control in relation to baseline versus post-construction vegetation.

			provided to the relevant planning authority.	<p>It is unclear, whether or not this refers to updated, complete and more accurate baseline vegetation surveys than those available to date.</p> <p>It is unclear, if these monitoring survey results would be provided annually or only at the end of the aftercare period.</p> <p>SCC (Landscape) considers it necessary that reports are provided annually to inform further aftercare and maintenance requirements.</p> <p>LV05 does not fully line up with the wording in paragraph 9.1.6 in the LEMP <b>[REP9-039]</b> (see comments below).</p>
2c	Landscape and Visual			Where no further changes were made, SCC (Landscape)'s position also remains unchanged.

7.5.2 (F) CEMP Appendix B Register of Environmental Actions and Commitments (Tracked) [REP9-038]

Table 3: SCC Table of Comments on 7.5.2 (F) CEMP Appendix B Register of Environmental Actions and Commitments (Tracked) [REP9-038]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
3a	Historic Environment – Impacts on Hintlesham Hall	EM-AB01	<p>The Proposed Alignment to the north of Hintlesham Hall is based on the pylon locations from the optimised alignment discussed with English Heritage (now Historic England) in 2013. National Grid will continue to work with Historic England as the designs develop to identify the most suitable location for the pylons in relation to the setting of Hintlesham Hall, taking into account the limits of deviation and technical considerations such as distance between conductor spans. In utilising the LoD, National Grid will not position a pylon between the access track to Kennels Cottage (608128, 244214) and 100m to the south west of the track (608027, 244151) in order to avoid its visibility in key views from the Grade II* listed ancillary buildings located to the north of Hintlesham Hall, which comprise the converted service ranges, stables, coach house and brewhouse. Within two months of completion of pylon RB8 construction, final details of the as built pylon locations immediately to the north of Hintlesham Hall will be provided to the relevant local planning authority and Historic England.</p>	<p>SCC (Planning) rejects the proposal by the Applicant in notifying the relevant local planning authority and Historic England ‘within two months of completion of pylon RB8 construction’, similar text appears in SoCG ID 4.6.2 [REP9-026].</p> <p>If SCC interprets this correctly, this proposes to provide the details of the new pylon <i>after</i> it has been erected. Further, the comment mentions continuing work with Historic England, however, it does not mention the relevant local planning authorities, which is considered insufficient.</p> <p>SCC’s position can be found in SoCG ID 4.6.2 [REP9-026] under The Consultee Position:</p> <p><i>“Final details of pylon locations should be provided by National Grid’s Main Works Contractor to both the relevant local planning authorities and Historic England, for avoidance of doubt in respect of the final pylon locations. This provision is purely for the avoidance of doubt in respect of the final pylon locations; therefore, this is considered a reasonable prior notification of the Main</i></p>

				<i>Works Contractor’s final proposals to the relevant statutory consultees.”</i>
3b	Landscape and Visual		LV04 and LV05	Please see comments with regards to LV04 and LV05 in SCC Table 2 of Comments on 7.5.1 (D) CEMP Appendix A Code of Construction Practice (Tracked) <b>[REP9-036]</b> and SCC Table 4 of Comments on 7.8 (D) Landscape and Ecological Management Plan (Tracked) <b>[REP9-039]</b> of this document.



7.8 (D) Landscape and Ecological Management Plan (Tracked) [REP9-039]

Table 4: SCC Table of Comments on 7.8 (D) Landscape and Ecological Management Plan (Tracked) [REP9-039]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
	Overall			SCC (Landscape) considers that the final changes the Applicant has made to the LEMP at Deadline 9 do not alter SCC's position that this document is not suitable to be the final control document or even the outline document, as there are still significant shortfalls. The Councils have repeatedly provided guidance as to what they consider necessary to be provided, in particular in the Landscape and Ecological Management Plan Document Review [REP5-035].
4a	Woodland and Tree Removal	7.2.1-7.2.3	<p>Widths of swathes through woodlands</p> <p>7.2.1 where there is an existing maintained swathe will have an up to 20m wide swathe coppiced</p> <p>7.2.1 In woodland areas without an existing maintained swathe, up to a 45m wide swathe will be coppiced</p> <p>7.2.3 Where there is an existing maintained swathe, the trees on either side of the coppiced section will be graduated cut for up to an additional 12.5m on either</p>	<p>SCC (Landscape) consider that there remain inconsistencies in this section of the LEMP.</p> <p>Taking into consideration the Applicant's response in 8.11.3: Applicant's Comments on Other Submissions Received at Deadline 8 [REP9-065] to a previous query by SCC at Deadline 7 (SCC Table of Comments on 7.8 (C) LEMP [REP8-046]) relating to this section of the LEMP, SCC (landscape) accepts the Applicant's response and explanation in [REP9-065], but considers that the wording used in the LEMP is not clear and that this section needs to be reworded to be as clear as the Applicant's response. Illustration 7.1 is no longer helpful, as this is no longer what is proposed.</p>

			side of the 20m swathe to accommodate construction activities.	
4b	Natural Generation of Woodland	8.4.10- 8.4.12		<p>SCC (Landscape) considers that the provisions remain inadequate and in places counterproductive. Please see previous comments, for example in <b>[REP8-047]</b>.</p> <p>Taking into consideration the Applicant's response in 8.11.3: Applicant's Comments on Other Submissions Received at Deadline 8 <b>[REP9-065]</b> to a previous query by SCC at Deadline 7 (SCC Table of Comments on 7.8 (C) LEMP <b>[REP8-046]</b>) relating to this section of the LEMP, SCC (landscape) accepts the Applicant's response and explanation in <b>[REP9-065]</b>, but considers that the wording used in the LEMP is not clear and that this section needs to be reworded to be as clear as the Applicant's response.</p> <p>It is not clear from the wording in paragraph 8.4. 12 of the LEMP <b>[REP9-039]</b> that the measures described (ploughing, de-compacting, dicing, harrowing) are intended to be carried out only, if the natural regeneration has failed. This leads to the question, how long would the natural regeneration be allowed to develop, before a decision for further action is made, and for how long would any further required planting be in aftercare for?</p>
4c	Aftercare	9.1.5	Prior to the end of the aftercare period, a final inspection will be undertaken at which any final replacement planting required shall be communicated to the landowner. A representative	<p>SCC (Landscape) considers that this is vague language and can only be interpreted to mean that it will be the landowners' obligation to carry out the final replacement planting at the end of the aftercare period. This is unacceptable. The final re-planting needs to be carried out by the Applicant.</p> <p>It is further not acceptable that the relevant planning authority is only to be present at the final inspection. This is too little, too late. SCC</p>

			<p>from the relevant planning authority will be present at the final inspection of reinstatement and mitigation planting prior to handover to the landowner, unless agreed otherwise with the relevant planning authority. Where applicable, remedial measures will be agreed between the Applicant and relevant planning authority during the site visit in accordance with the DCO (LV04).</p>	<p>(Landscape) considers that it is necessary that the relevant planning authority is involved in annual site inspections, to a) ascertain that necessary replacement planting is carried out at the earliest opportunity (i.e. the first planting season after the plant has failed) and b) to agree any variations in replacement planting that may become necessary.</p> <p>Local authorities are effectively responsible for monitoring the implementation of the scheme as consented by the Secretary of State, and ensuring, on behalf of local communities &amp; local taxpayers, that, in practice, rather than just on paper, the impacts of the scheme are effectively and robustly mitigated.</p>
4d	Aftercare	9.1.6	<p>Following the completion of any agreed replacement planting, a from the final inspection will then be held as part of the completion of the aftercare, whereupon National Grid shall cease to have any further maintenance obligation. National Grid will notify the relevant planning authority when the aftercare period is complete. In addition, National Grid will also provide copies of the</p>	<p>SCC (Landscape) would request that there should be an inspection of the final replacement planting prior to, or as part of, the handover, as per the previous iteration of the LEMP at paragraph 9.1.6.</p> <p>The wording referenced as LV05 does not fully line up with its description in the CoCP <b>[REP9-035]</b>.</p> <p>The LEMP seems to suggest that the monitoring survey reports would only be provided at the end of the aftercare period.</p> <p>SCC (Landscape) considers it necessary that reports are provided annually to inform further aftercare and maintenance requirements.</p>

			post-construction vegetation (aftercare monitoring) surveys to the relevant planning authority for information (LV05).	
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7.10 (D) Outline Written Scheme of Investigation (Tracked) [REP9-046]

<b>Table 5: SCC Table of Comments on 7.10 (D) Outline Written Scheme of Investigation (Tracked) [REP9-046]</b>				
<b>Ref</b>	<b>Topic</b>	<b>Ref No.</b>	<b>Summary of Comments</b>	<b>SCC's Comments</b>
5a	Introduction - Purpose of this Report	1.2.5	<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 based on the approach set out within the Archaeological Framework Strategy. 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. The trial trenching excluded the areas that would lie above the trenchless crossings (where the soil would not be disturbed) but did focus on the compounds at either side of the trenchless crossings. One area east of the River Stour was not trenched due to ecological constraints (Cotswold Archaeology trenches G6.24 – G6.28) and a further area of trial trenching was curtailed</p>	<p>SCC (Archaeological Service) would note that the results of the trenched archaeological evaluation have only been provided in summary reports for stages 1-4, SCCAS are still awaiting the results of the Stage 5 trenched archaeological evaluation.</p> <p>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.</p> <p>This paragraph should also clarify that trenched archaeological evaluation has only been undertaken within the undergrounding sections of the proposal and cable sealing end. 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.</p> <p>Area G6-trenches G6.24-G6.28 is in an area of high archaeological potential, given that there is archaeology relating to Roman occupation in the field</p>

			on the advice of the Local Authority Advisor due to former quarrying.	to the immediate West, which has been identified as part of the B2T archaeological works. There is currently <b>no provision</b> to accurately assess the archaeological potential of this area post-determination.
5b	Introduction - Purpose of this Report	1.2.7	<p>The trial trench locations targeted an assortment of potentially important archaeological anomalies identified during the non-intrusive surveys mentioned above. In some cases, these anomalies were not previously represented on the local Historic Environment Records (HER). The results of the trial trenching up to August 2023 are available in a series of interim reports that have been issued to the County Archaeologists (Cotswold Archaeology, 2022 and 2023a-d). A final report detailing the completed trial trenching, including the final phase of trial trenching completed in November 2023, along with the full interpretive report with specialist inputs is due in March 2024 (Cotswold Archaeology, forthcoming). Although an interim report is not available for the final phase of trial trenching (completed in November 2023), the Local Authority Advisors received daily reports during the trail trenching on the results of the archaeological features found and are therefore aware of the preliminary</p>	<p>SCC (Archaeological Service) would note that the evaluation was undertaken to assess the archaeological resource within the undergrounding area, this was done at a lower percentage due to site access concerns and constraints of opening and closing trenches within the same day as opening the trench.</p>

			findings of each of the trenches.	
5c	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"> <li>• 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;</li> <li>• 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;</li> <li>• 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 been proposed in locations where the environment above the crossing is sensitive and the design has sought to avoid impacts to this</li> </ul>	<p>SCC (Archaeological Service) would note that 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.</p> <p>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.</p> <p>For modification works, construction compound/storage area locations would need to be assessed and mitigated appropriately.</p> <p>The area of the trenchless crossing is to 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. Therefore, there is archaeological mitigation proposed for the trenchless river crossing areas, and this section should be removed from 1.3.3.</p>

			<p>area; and</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>Planting areas should be considered for archaeological assessment, evaluation and mitigation depending on the planting proposals.</p> <p>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.</p> <p>Any areas of habitat creation would need subject to the same level of archaeological assessment (geophysics and trenched archaeological evaluation) as described above.</p>
5d	Introduction - Structure of this Report	1.5		<p>The OWSI should have an historic background and summarise the archaeological work that has been undertaken, DBA, Geophysical Survey and trenched archaeological evaluation.</p> <p>Plans provided in the document should also show the areas that have been subject to geophysical survey and trenched archaeological evaluation. Figures should also be provided with the plotted geophysics results and results of the trenched archaeological evaluation.</p>



<p>5e</p>	<p>Introduction - Structure of this Report</p>	<p>1.5.1</p>	<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</p> <p>mitigate adverse effects on archaeological remains during the construction and operational phases, namely:</p> <ul style="list-style-type: none"> <li>• Retention in situ (Chapter 3) – This is where known archaeological remains are preserved in place wherever possible;</li> <li>• 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;</li> <li>• Archaeological Strip, Map and</li> </ul>	<p>SCC (Archaeological Service) would note that bullet point 1 refers to chapter 3 as retention in situ, where the chapter is titled Preservation in situ.</p> <p>SMS is not undertaken ahead of the construction works it is undertaken prior to the commencement of construction works. Please see comments on sections 5.1.1/5.1.2 below.</p> <p>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.</p> <p>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>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:</p>
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			<p>Sample (SMS) (Chapter 5) – This is where a suitably qualified archaeologist watches the removal of overburden material (the ‘strip’) ahead of the construction works. Any exposed features are ‘mapped’ and a ‘sample’ of the feature is excavated; and</p> <ul style="list-style-type: none"> <li>• Archaeological Monitoring and Recording (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. Archaeological Monitoring and Recording (formerly known as ‘watching brief’) can be proactive (archaeological-led or supervised machine strip) or reactive (periodic inspection of groundworks underway).</li> </ul>	<p><b>Post-determination Geophysical Survey</b></p> <p>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.</p> <p><b>Post-determination Trenched Archaeological Evaluation</b></p> <p>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.</p> <p>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.</p> <p>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</p>
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				<p>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.</p> <p>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.</p> <p>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.</p> <p>Understanding the archaeological resource by post-determination works outlined above will enable the archaeological resource to be accurately quantified, this will then enable the appropriate level of archaeological mitigation to be determined, as well as a better understanding of how archaeology should be timetabled and costed within the scope of works to ensure there are no unexpected delays to project delivery.</p>
5f	General Considerations –	2.4.2	A list of named individuals for the following roles should they be identified as being required in the DWSI: Project manager;	SCC (Archaeological Service) would note that it is required that all DWSIs identify all specialists the

	Detailed Written Schemes of Investigation		<p>Environmental specialists, which could include Archaeobotany specialist, charcoal specialist, macrofossil and microfossil specialist; mineral preserved organics specialist; lithics specialist with relevant period and regional expertise; ceramics specialist with relevant period and regional expertise; metalwork specialist with relevant period and regional expertise; geoarchaeologist; geophysicist; archaeological surveyor; human remains specialist with experience of working with cremated human remains; animal bone specialist; scientific dating specialist; metal detectorist; public archaeology and community engagement specialist; conservation specialist and the conservation lab details; finds coordinator/processing specialist; digital data manager; and a publication manager;</p>	<p>contracted archaeological contractor uses and indicate whether they are internal and external specialists. The DWSIs will need to provide a named list of all specialists identified in the specialist list provided in the DWSI.</p> <p>The LAA will be afforded the ability to comment on the specialist lists and be provided with the CVs and publication history of specialists on request.</p> <p>The specialist list needs to state that the archaeological contractors' archaeological specialists will have experience of working in East Anglia and of local typologies.</p>
5g	Preservation <i>in situ</i> – Introduction	3.1.1	<p>The retention of archaeological remains, otherwise known as 'preservation in situ' is the term used to refer to the conservation of an archaeological asset in its original location. It can describe situations when a site is preserved as part of a project, for example by the following measures:</p> <ul style="list-style-type: none"> <li>• Avoidance through routeing studies so that the project components are located away from known</li> </ul>	<p>SCC (Archaeological Service) would note that although 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, by post-determination trenched archaeological evaluation, this section should specify that:</p>

			<p>archaeological features and remains;</p> <ul style="list-style-type: none"> <li>• Avoidance of the archaeological remains through a minor variation (within either the Order Limits or the Limits of Deviation) in the proposed working area;</li> <li>• Use of trenchless (non-opencut) techniques, where practicable; and</li> <li>• Protection of subsoil within the working area (e.g. trackway panels, topsoil retention, or other suitable technique).</li> </ul>	<p>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.</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 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>
5h	Preservation in <i>situ</i> – Introductions	3.1.3	<p>Preservation in situ has been achieved through amendments to the alignment and through the development and refinement of the Order Limits to avoid known features identified during the archaeological surveys. No areas of preservation in situ are proposed</p>	<p>SCC (Archaeological Service) would note that 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</p>

			based on the results of the completed trial trench investigations.	evaluation identified an area of sensitive archaeology and avoidance could achieve preservation in situ.
5i	Preservation in <i>situ</i> – Locations	4.2.1	<p>Currently, targeted Archaeological OAE is proposed in two locations within the Order Limits as shown on Figure 1: Proposed Archaeological Mitigation:</p> <ul style="list-style-type: none"> <li>• Section G: South of Workhouse Green, where evidence from the trenched evaluation indicates an area of Roman activity; and</li> <li>• Section G: Either side of Moat Lane west of Lamarsh, where intensive cropmark activity located in the HER has been tested by trench evaluation and proven to contain Iron Age and Roman archaeology</li> </ul>	<p>SCC (Archaeological Service) have only seen results of the trenched archaeological evaluation for stages 1-4 and have not seen the full results of the fieldwork.</p> <p>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.</p> <p>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 and to allow archaeology to be appropriately timetabled and costed within the scope of work for the development, and to unsure there are no unexpected delays to project delivery.</p> <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</p>

				phase, which would be defined in Detailed Written Schemes of Investigation (DWSI).
5j	Preservation <i>in situ</i> – Detailed Written Scheme of Investigation	4.3.2	<p>The excavation and recording policies set out below are in line with good practice and adhere to the ClfA universal guidance for archaeological excavation (ClfA, 2023b).</p> <ul style="list-style-type: none"> <li>• Overburden Removal – the method of overburden removal will be detailed in the Archaeological Contractor’s DWSI;</li> <li>• Hand Excavation Policy – the Archaeological Contractor’s DWSI will stipulate a strategy for identifying archaeological remains and how they will carry out archaeological hand-excavation of the same in accordance with an agreed sampling strategy;</li> <li>• Archaeological Recording – the Archaeological Contractor’s 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;</li> <li>• Environmental Sampling Policy – the Archaeological Contractor’s DWSI will contain detailed methodologies</li> </ul>	<p>SCC (Archaeological Service) would note that paragraph 4.3.1 states that “the DWSI will use the methodological parameters regarding the methods of overburden removal, hand excavation, environmental sampling etc set out below” [para 4.3.2]. However, paragraph 4.3.2 does not provide sufficient detail regarding the methodological parameter.</p> <p>The OWSI should inform the DWSIs of the baseline requirements of the archaeological methodology, which should include (but not limited to):</p> <p>Overburden removal – the method of overburden removal will be detailed in the archaeological contractors DWSI, which will include:</p> <ul style="list-style-type: none"> <li>• Topsoil may be mechanically removed (unless otherwise agreed) using a machine of an appropriate size, with a back acting 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.</li> <li>• Topsoil, subsoil should be kept separate during removal to allow sequential backfilling</li> </ul>

			<p>for the collection of soil samples, the treatment of waterlogged remains and the most appropriate methods of scientific dating. The Archaeological Contractor’s DWSI will also detail the proposed treatment of human remains, as well as stipulating the need to obtain a project-wide burial licence from the Ministry of Justice prior to the commencement of fieldwork; and</p> <ul style="list-style-type: none"> <li>• Artefact Policies – the retrieval, conservation and analysis of archaeological artefacts will be detailed in the Archaeological Contractor’s DWSI. This will include the treatment of small finds and treasure.</li> </ul>	<p>of the excavation area, unless otherwise agreed with the developer.</p> <ul style="list-style-type: none"> <li>• The DWSI will contain a detailed spoil management strategy including locations of topsoil and subsoil storage areas.</li> <li>• 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.</li> </ul> <p>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, which will include:</p> <ul style="list-style-type: none"> <li>• All features, including presumed natural and geological features are to be investigated and recorded unless otherwise agreed with the LAAA.</li> <li>• All archaeological features excavated by hand to establish date, function, and depth, for guidance:</li> <li>• A minimum of 50% of the fills of general features is to be excavated. In some instances, 100% may be requested depending on the significance of the feature/deposit.</li> <li>• A minimum of 10% of the fills of linear features (ditches, etc) are to be excavated. The</li> </ul>
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				<p>interventions must be representative of the available length of the feature and must consider any variations of size, depth, fills and any concentration of artefacts. For linear features 1.00m wide slots should be excavated across their width. Depending on the significance of the feature a higher percentage sample may be requested, increasing in 10% increments until the LAAA are satisfied that research aims can be answered.</p> <ul style="list-style-type: none"> <li>• Archaeological interventions should be placed to best allow the understanding of the relationships between features and deposits (including relationship sections).</li> <li>• For discrete features, such as pits, 50% of their fills should be excavated and sampled for environmental evidence. In some instances, 100% may be requested depending on the significance of the feature.</li> <li>• Large or deep features may be excavated in quadrants in the first instance, or in other such gridded or systematic excavation as may be appropriate to the feature type.</li> <li>• Provision should be made to fully investigate the depth of sequences and the depth of archaeological features. This may involve the use of stepping or shoring.</li> <li>• Appropriate provision should be made for</li> </ul>
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				<p>extracting water from sites and features.</p> <ul style="list-style-type: none"> <li>• Hand auger or a power auger (where appropriate) is recommended to gain information from very deep features so a safe excavation strategy can be designed and implemented in discussion with the LAAA.</li> </ul> <p>Human remains - The archaeological contractors DWSI will contain a detailed methodology for the excavation, recording and sampling of any human remains, this should include:</p> <ul style="list-style-type: none"> <li>• In the event human remains are discovered the archaeological contractor will notify National Grid immediately. The National Grid will immediately notify the relevant LAAA. Remains are to be left <i>in situ</i>, covered and protected in the first instance and the LAAA and archaeological contractor’s human remains specialist will need to assess the condition of the human remains and agree an excavation methodology.</li> <li>• Human remains are to be treated at all stages with care and respect and are to be dealt with in accordance with the law. They must be recorded <i>in situ</i> and subsequently lifted, packed and marked to the standards compatible with those described in current guidance from ClfA, Historic England, Advisory Panel on the Archaeology of Burials in England and the British Association of Biological Anthropology and Osteoarchaeology (BABAO).</li> </ul>
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				<p>Proposals for the final deposition of remains following the study and analysis will be required in the OWSI and DWSIs.</p> <p>Inhumations – should include the following but not limited to:</p> <ul style="list-style-type: none"> <li>• Sites where furnished burials are known, anticipated, or identified, should comply with SCCAS (2023) Guidance on “excavating inhumations for mineral preserved organics”.</li> <li>• Environmental samples to be taken from the lens of soil remaining at the base of the grave, divided into head torso and feet.</li> </ul> <p>Cremations – should include the following but not limited to:</p> <ul style="list-style-type: none"> <li>• Cremation deposits should be subject to sampling and assessment for charcoal, charred plant remains, artefacts and the recovery of human bone.</li> <li>• Where un-urned cremations are suspected or discovered, these will be 100% excavated, and 100% sampled with taken from every 5cm interval until the entire cremation has been excavated.</li> <li>• Urned cremations will be block lifted to allow for X-radiography and excavation under laboratory conditions.</li> </ul>
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				<p>Environmental Sampling policy - 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.</p> <ul style="list-style-type: none"> <li>• The DWSI must provide details of a comprehensive sampling strategy for flotation, assessment and analysis of biological remains by a named environmental specialist (for palaeoenvironmental and paleoeconomic investigations and also for absolute dating), and samples of sediments and/or soils (for micromorphological and other pedological/sedimentological analysis).</li> <li>• All samples should be retained until their potential has been assessed and until a retention strategy has been agreed. Where necessary, advice on the appropriateness of the proposed strategy should be sought from the Historic England Regional Advisor the Archaeological Science (East of England).</li> <li>• Samples of burnt flint retained for lipid analysis should not be washed.</li> </ul> <p>Scientific Dating policy – 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</p>
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				<p>will provide advice and guidance throughout the project and should consult the Historic England Regional Science advisor. Scientific dating techniques.</p> <p>As a baseline each DWSI will include provision for the following:</p> <ul style="list-style-type: none"> <li>• Radiocarbon (C-14) dating and Bayesian chronological modelling - Radiocarbon Dating and Chronological Modelling: Guidelines and Best Practice (Historic England, 2022)</li> <li>• Luminescence dating (optically stimulated luminescence or OSL):</li> <li>• Archaeomagnetic dating for in situ fired material such as kilns or ovens and waterlogged deposits.</li> <li>• Dendrochronology - Dendrochronology: Guidelines on producing and interpreting dendrochronological dates (Historic England 1998)</li> </ul> <p>Archaeological recording – 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.</p> <ul style="list-style-type: none"> <li>• Excavation recording is to be consistent with the requirements of the Suffolk and Essex Historic Environment Record (HER) and compatible with the archive for deposition.</li> </ul>
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				<p>Methods must be specified in the DWSI and agreed with the LAAA.</p> <ul style="list-style-type: none"> <li>• All archaeological features, layers or deposits will be allocated unique context numbers. Each context will be recorded by written and measured description. On-site matrices will be compiled during the excavation such that the results of the written stratigraphical records may be fully analysed and phased.</li> <li>• Plans of archaeological features on the site are to be drawn at 1:20 or 1:50, depending on the complexity of the feature/s being recorded.</li> <li>• Sections of features are to be drawn at 1:10 or 1:20, depending on the complexity of the feature/s being recorded.</li> <li>• If digital recording is used, then DWSI must state the digital recording methodology and details on storage of the site records and backups.</li> <li>• A sufficient number of levels will be taken across the excavation are to gain an understanding of subsurface topography, all levels should relate to Ordinance datum.</li> <li>• All features should be recorded using RTK GPS survey equipment or Total Station (as appropriate) and site plans should be provided</li> </ul>
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				<p>to the LAAA on a regular basis.</p> <ul style="list-style-type: none"> <li>• A photographic record of the work is to be made, consisting of high-resolution digital images. All cameras must have sensors of APS-C (or larger) and all images must be at least 10 megapixels in size. All digital images for archiving purposes must be high quality non-altered RAW files (.DNG) or TIFF images. JPG images must not be used for archiving.</li> </ul> <p>Artefact Policies – The retrieval, conservation and analysis of archaeological artefacts will be detailed in the archaeological contractors DWSI,</p> <ul style="list-style-type: none"> <li>• All artefacts will be collected and bagged by context.</li> <li>• All small finds will be GPS plotted so the find can be 3-Dimensionally located within its context and the site.</li> <li>• Treasure will be reported to the LAAA immediately and the relevant county Finds Liaison Officer (FLO). The Archaeological Contractor will comply with the provisions of the Treasure Act. Findings will be reported to the Coroner within 14days.</li> <li>• Finds that are suspected to contain preserved organic residues will not be cleaned in accordance with Historic England Guidance.</li> <li>• Every effort must be made to get the</li> </ul>
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				<p>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.</p> <p>Research objectives will need to be detailed in the DWSIs, and the excavation strategy will be kept under review throughout the archaeological works.</p>
5k	Archaeological Strip, Map and Sample Excavation – Introduction	5.1.2	<p>SMS excavation is a form of excavation usually tied in with the Main Works Contractor’s overburden removal at the outset of the construction phase (and prior to the main construction activities) yet is done under controlled archaeological conditions in the relevant areas. This method of mitigation is typically applied where large areas of land require archaeological mitigation within the construction programme, and where a lower feature sample rate is often applied relative to OAE.</p>	<p>SCC (Archaeological Service) would note that SMS excavation is not tied into the Main Works Contractor’s overburden removal - that is Archaeological Monitoring and Recording, covered in chapter 6. SMS excavation is timetabled in prior to the commencement of construction works commencing, so archaeology is cleared the same as OAE.</p> <p>Undertaking SMS excavation during the main works contractors overburden removal on sites of known archaeology would lead to delays in project delivery.</p>
5l	Archaeological Strip, Map and Sample Excavation – Introduction	5.1.3	<p>SMS is both an evaluation and a mitigation technique, used to explore the spatial characteristics of archaeological features (such as field systems), where the sample of features to be excavated will be determined by the Local Authority Advisors following the submission of pre-excavation plans of stripped areas and initial site monitoring</p>	<p>SCC (Archaeological Service) welcome this addition, however, given paragraph 5.1.2, SMS methodology would only be implemented as an evaluation technique, where low percentage trenched archaeological evaluation has been undertaken and indicated that SMS would be an appropriate approach to mitigating the impacts of the proposal, without requiring additional trenching to be undertaken to</p>



			visits and results from initial excavation. Where areas of significant or complex archaeological remains are identified, the SMS methodology may (in discussion with the Local Authority Advisors) be superseded with a targeted OAE methodology for more detailed excavation and recording.	increase the trenching percentage in the areas that have already been trenched and determine areas of OAE.
5m	Archaeological Strip, Map and Sample Excavation – Introduction	5.1.4	This method is undertaken across areas with a moderate to high archaeological potential and with the Main Works Contractor machinery under immediate direction from an archaeological banksman.	SCC (Archaeological Service) would note that SMS excavation methodology is timetabled in prior to the commencement of groundworks to ensure archaeology is cleared prior to the Main Works Contractor commencing development. Programming in SMS alongside the Main Works Contractors works would cause delay to project delivery should unforeseen archaeological remains be identified during the archaeological works.
5n	Archaeological Strip, Map and Sample Excavation – Introduction	5.1.7	There may also be discrete areas of SMS within the overhead line sections, for example if the pylon and crane bases are in archaeologically sensitive areas. These areas will be agreed with the Local Authority Advisors.	SCC (Archaeological Service) would note that further trenched archaeological evaluation is required in the areas that have not be subject to trenched archaeological evaluation at the pre-determination phase. This will enable the archaeological resource to be accurately quantified and the appropriate level of archaeological mitigation to be determined.  For detailed comments see comments on para 1.5.1.
5o	Archaeological Strip, Map and Sample Excavation –	5.2.1	SMS excavation will be applied in areas of the project where the presence of archaeological remains warrant preservation by record and the project is anticipated to require topsoil	SCC (Archaeological Service) would direct to the comments for paragraph 4.2.1

	Locations		<p>removal. Areas identified for SMS excavation are shown on Figure 1:</p> <p>Proposed Archaeological Mitigation and include:</p> <ul style="list-style-type: none"> <li>• Section E: area of SMS just to the east of the River Box adjacent (north-east of) to the approximate HDD pits</li> <li>• Section F: Leavenheath/Assington, immediately to the north of Leavenheath village in the location of the proposed construction compound where potentially prehistoric remains were identified during ATT, including a cremation burial; and</li> <li>• Section G: Stour Valley, to the east of St Edmund’s Hill, where kiln remains were found during ATT.</li> </ul>	
5p	Archaeological Monitoring and Recording - Introduction	6.1.2	<p>Archaeological Monitoring and Recording 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>SCC (Archaeological Service) would note that Archaeological Monitoring and Recording (AMR) should only be used to provide opportunities for archaeological investigation and recording in circumstances where OAE and SMS would otherwise be impracticable.</p> <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</p>

				<p>access routes, laydown areas and construction compounds. <b>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.</b></p> <p><b>This approach will cause delays to project delivery through the discovery of un-expected archaeological remains.</b></p> <p>An appropriate methodology to use on a scheme of this size should be archaeological evaluation (post-determination geophysics and trenched archaeological evaluation to a 4% sample) followed by appropriate levels of mitigation.</p>
5q	Archaeological Monitoring and Recording - Introduction	6.1.3	<ul style="list-style-type: none"> <li>To investigate any archaeological remains present and define their extent and character in relation to the working area;</li> </ul>	<p>SCC (Archaeological Service) would note that this bullet point is more appropriate for an SMS excavation methodology, rather than an archaeological monitoring and recording.</p>
5r	Archaeological Monitoring and Recording - Locations	6.2.1	<p>Archaeological Monitoring and Recording will be implemented in areas of topsoil removal, where ground has not previously been disturbed, along the sections of underground cables and new overhead lines (construction of new pylon bases and new stone temporary access routes) where archaeological remains are present, or potentially present,</p>	<p>SCC (Archaeological Service) would direct to the comments for paragraph 4.2.1.</p>

			with the exception of those areas where preservation in situ, OAE or SMS will be carried out, or areas within the cable undergrounding sections where the ATT has demonstrated that there is no archaeological interest. These areas are shown on Figure 1: Proposed Archaeological Mitigation	
5s	Archaeological Monitoring and Recording - Locations	6.2.2	An area of proposed Archaeological Monitoring and Recording is also proposed at the grid supply point (GSP) substation (Figure 1: Proposed Archaeological Mitigation), where some undated archaeological features were located during ATT.	SCC (Archaeological Service) would direct to the comments for paragraph 4.2.1.
5t	Geoarchaeological and Palaeoenvironmental Investigation and Mitigation - Introduction	7.1		<p>SCC (Archaeological Service) would note that this section should reference relevant Historic England Guidance for geoarchaeological and palaeoenvironmental assessment.</p> <p>This should also reference SCCAS guidance for palaeoenvironmental assessment.</p>
5u	Geoarchaeological and Palaeoenvironmental Investigation and Mitigation - Locations	7.2		<p>SCC (Archaeological Service) would note that the paragraph numbering is not consistent in this section of the chapter.</p> <p>Additionally, has the Historic England Regional Science Advisor seen and commented on the results of the preliminary assessments?</p>

5v	Dissemination - Introduction	8.1.4	An Archive Report will be produced based on the scope and schedules in the PXA Report and UPD, as detailed above. This will be submitted to the Local Authority Advisors for approval.	<p>SCC (Archaeological Service) would note that the UPD will include details on the publication, whether it will be published in a journal, or monograph, as detailed in section 8.5.</p> <p>A summary report must be prepared in the established format, suitable for inclusion in the annual 'Archaeology in Suffolk' section of the <i>Proceedings of the Suffolk Institute of Archaeology and History</i>. This should be included in the Archive report, or submitted to SCCAS, by the end of the calendar year in which the archaeological works have been completed.</p>
5w	Dissemination – Updated Project Design	8.3		<p>SCC (Archaeological Service) would note that the timescales provide in the UPD cannot be determined until the PXA has been completed. The OWSI therefore cannot provide an accurate timescale for delivery of the Archive Report, Publication and Archiving. SCCAS will advise the addition of appropriate DCO wording to secure the implementation of the UPD time scales, to secure reporting, publication and archiving.</p>
5x	Dissemination – Archive Report	8.4.5	The draft Archive Report (marked 'Draft') will be submitted to the Local Authority Advisors for review by National Grid. In finalising the report the Archaeological Contractor will consider any comments made by the Local Authority Advisors. The final report will be delivered to the Local Authority Advisors in	<p>SCC (Archaeological Service) would note this is not appropriate, any requested amendments to the document provided by the LAAA will be made by the archaeological contractor, to ensure a suitable document is included in the HER and Archive.</p>

			electronic .pdf format, all inclusive of figures and other appendices.	
5y	Dissemination – Outreach	8.6		<p>SCC (Archaeological Service) would note that the OWSI outreach provision needs further consideration, there are opportunities for Archaeological Outreach officer to be included as part of the archaeological works, to promote heritage and the development.</p> <p>Following completion of the fieldwork, there should be provision for a blog post on the archaeological project to the Suffolk Heritage Explorer.</p>
5z	Archiving	9		<p>There needs to be more details on the retention of the physical archive by the archaeological contractor prior to submission to the deposition with the recipient archive.</p> <p>For Suffolk this will be the SCCAS Archaeology Store. This should also detail archive deposition for Essex archive.</p> <p>The OWSI needs to provide more details on provision for Digital Archive deposition. The needs OWSI include a project digital management plan for the full site archive, and each DWSI will need to have individual data management plans which refers to the OWSI digital management plan.</p> <p>There will be a large amount of digital information created from this project, as a result the OWSI and resulting DWSIs should also state proposals for the deposition of the digital archive relating to this</p>

				<p>scheme with the Archaeology Data Service (ADS), or similar digital archive repository, and allowance should be made for costs incurred to ensure proper deposition</p> <p>██</p> <p>Due to the size of the project costs for digital archiving will need to be agreed early in the project work with ADS.</p>
5aa	Archiving	9.1.2	The Archaeological Contractor will integrate the archives from all project archaeological mitigation into a single archive.	<p>SCC (Archaeological Service) would note that this contradicts with paragraph 9.1.4 which states that the archive will be deposited with the appropriate repository. The OWSI must clearly set out archive deposition for the DWSIs to reference.</p> <p>The Suffolk archive will need to be deposited in the SCCAS Archaeology Store. The OWSI will need to detail on deposition location for the Essex physical archive.</p>
5bb	Archiving	9.1.4	The archive (finds and records) will be retained by the Archaeological Contractor before being deposited with the appropriate repository. A security copy of the archive will be made in an appropriate medium. All archive preparation will be undertaken in accordance with guidelines published by the ClfA on behalf of the Archaeological Archives Forum (ClfA, 2012).	<p>SCC (Archaeological Service) would note that this is in contradiction with paragraph 9.1.2 where it states “The Archaeological Contractor will integrate the archives from all project archaeological mitigation into a single archive” the archive section needs to clearly state the intended archive repository for both Suffolk and Essex.</p> <p>For Suffolk this would be the SCCAS Archaeology Store.</p>

5cc	Figures	Figures 1 – 4		<p>SCC (Archaeological Service) would note that the Figures provided in the document should also show the areas that have been subject to geophysical survey and trenched archaeological evaluation. Figures should also be provided with the plotted geophysics results and results of the trenched archaeological evaluation.</p>
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8.11.2 Applicant’s Comments on Host Authorities’ Deadline 8 Letter [REP9-064]

<b>Table 6: SCC Table of Comments on 8.11.2 Applicant’s Comments on Host Authorities’ Deadline 8 Letter [REP9-064]</b>				
<b>Ref</b>	<b>Topic</b>	<b>Ref No.</b>	<b>Summary of Comments</b>	<b>SCC’s Comments</b>
6a	2 Adequacy of Management plans	2.2.5		
6b	Landscape and Ecological Management Plan	2.2.20	The purpose of the LEMP is not to provide details of survey and assessment, nor to provide detailed method statements, its purpose is to provide a framework for how impacts will be managed (‘the outcomes-based approach’). The Applicant notes that Requirement 8 commits the Applicant to submitting the plans showing vegetation retention and removal to the Councils as part of the discharge of requirements. In addition, Requirement 9 commits the Applicant to providing the reinstatement (including embedded planting and mitigation) planting to the councils along with 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. Therefore, the Councils will have a further opportunity to comment on the extent of vegetation retention and removal and the planting proposals, outside of the Management Plan, once this detail is known.	SCC (Landscape) would welcome an outcomes-based approach, in particular with regards to achieving landscape and ecological mitigation goals, rather than the time restricted approach pursued by the Applicant. The Council agrees that the purpose of an (outline) LEMP is to provide a framework, but even in outline form it should contain sufficiently detailed management prescriptions to enable a smooth progression into detailed LEMPs. It is essential that the framework is fit for purpose, as post consent any changes will need to sit within the consented framework and the opportunities to for change will be limited. Requirement s 8 and 9 of the draft DCO do not alleviate the Council’s concerns in this regard.

6c		2.2.22	The Applicant has taken onboard a number of comments made by the Councils in updating the LEMP and is of the view that concessions have been made on numerous points to address comments on the LEMP and no further action is necessary.	The Council welcomes that the Applicant has taken some comments on board. However, SCC considers that the changes made have not gone far enough to alleviate the Council’s concerns.
	6d Adequacy of Landscape Mitigation and Compensation	3.2.1- 3.2.2	[...] The project has also committed to a 10% Biodiversity Net Gain which will complement landscape and visual reinstatement and mitigation planting. As such, the benefits of the project will significantly and demonstrably outweigh the harm identified.	The Council welcomes the regulatory commitment, placed on National Grid by Ofgem, to provide 10% Biodiversity Net Gain. However, the Council considers that achieving this obligation is put at risk, because of inadequate aftercare provision for reinstatement measures (mitigation), the complete success of which forms the basis on which net gain can be achieved.
6e	6f	3.2.3	[...] the EIA Regulations state in Article 14(2)(c) that an ES must include: ‘a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment’. [...]	SCC considers that it is possible to offset, i.e. compensate, likely significant residual effects, by way of wider landscape restoration. SCC also considers that ‘if possible’ means that these measures should be included, if they are possible. The Applicant has, however, refused to even explore the art of the possible in this context.
6g	6h	3.2.5	The landscape and visual assessment has identified a small number of receptors that would experience residual significant adverse effects, namely in parts of Burstall and to the north of Hintlesham where there would be a new overhead line. Although, the Applicant has proposed planting at these locations, it is noted that this would not completely mitigate the effects to the receptors (and indeed any quantity of planting will	SCC considers that the described scenario, when no amount of planting can fully mitigate the effect of the pylons, is the exact point at which the compensation element of the mitigation hierarchy comes into play and requires exploration.  SCC considers that the residual adverse effects are not small in number and in their accumulation become significant.

			<p>not fully mitigate the effect of the additional pylons in the landscape). The Applicant maintains that the planning balance, and the significant beneficial effects that would be experienced at other receptors, including the receptors in the Dedham Vale National Landscape and in the Stour Valley, would outweigh the small number of adverse effects. Therefore, the Applicant does not consider there to be a need to include further planting to compensate for the effects of the project, which in any case, would not benefit the receptors adversely affected.</p>	<p>While compensation measures in form of wider landscape restoration would not be able to restore all affected views, it would benefit adversely affected visual receptors, as they move through an enhanced landscape.</p>
6i	6j 4. Control and Supervision of the Execution and Aftercare of Landscape and Ecological Mitigation, and Biodiversity Net Gain	4.2.1	<p>The Applicant considers that the project strikes the correct balance with regard to the duration of the aftercare period, having thought very carefully about an appropriate aftercare strategy at each location based on the specific needs of the local environment, the desired outcome, rather than applying a standard blanket duration across the project.</p> <p>[...] the impact on landowners of any planting and subsequent obligations and restrictions must be considered. Where the Applicant has sought compulsory acquisition powers, the Applicant must demonstrate that there is a compelling case in the public interest for those powers. In this particular context considerations therefore</p>	<p>While SCC welcomes the embedded commitment by the Applicant to maintain landscape screening around the GSP substation and the CSE compounds for the lifetime of the transmission asset, SCC (Landscape) cannot see, how an aftercare period of five years for all types of mitigation measures form grassland to naturally regenerated woodland can be regarded as anything other than a standard blanket approach.</p> <p>SCC appreciates that the required successful reinstatement planting puts constraints on landowners.</p> <p>However, it should be considered that, if it is not possible to achieve full reinstatement, it is also likely that 10% of Biodiversity Net Gain will not be achieved.</p>

			included the constraints on landowners by virtue of the rights sought.	
6k	6l	4.2.5	<p>Remaining planting typically consists of the reinstatement of hedgerow gaps as identified in the LEMP Appendix B: Vegetation Reinstatement Plans (document 7.8.2 (D)) and would be maintained for a five-year period, [...]. After that time, the planting would be established and therefore managed by the relevant landowner, as currently takes place in respect of existing planting on private land. A longer duration for this aftercare is not necessary and would be onerous for the affected landowner. The Applicant considers that five-years is appropriate in the context of these locations, based on the types of reinstatement and mitigation planting proposed, which is typically hedgerow reinforcement and planting.</p>	<p>Given the unreliable weather patterns of recent years it is by no means certain that it will be possible to successful establish all reinstatement planting within five years.</p> <p>This may not even possible for all hedgerows to be planted and is even more uncertain for tree plantings and the natural generation of woodland, which are part of the reinstatement mix.</p> <p>SCC (Landscape)advocates an adaptive and dynamic aftercare approach, at the end of which fully established plantings would be handed back to the landowner.</p> <p>While SCC appreciates that the aftercare period puts a restraint on the landowner, this must be weighed up against the risk of the landowner being handed an unsuccessful planting scheme, which he may under obligation to rectify (see LEMP <b>[REP9-039]</b>, paragraph 9.1.5)</p>
6m	6n	4.2.7	<p>The Applicant maintains that five-years maintenance at these locations would not affect the Biodiversity Net Gain that would be delivered. It is the Applicant’s view that there should be no additional obligation on the Applicant (or private landowners) to manage or maintain planting on private land which forms part of the wider baseline, in the same way as the Applicant (or private landowners) would not be obliged to</p>	<p>SCC considers that the Applicant neds to hand the land back to the landowner in the same or in better condition than when they took possession of it. If the land contained a hedgerow, then it should contain a successfully established hedgerow at handover.</p> <p>It cannot be the responsibility of the landowner to rectify planting that has not been successful. Nor can it be acceptable for the landowner to receive land back that has not been successfully reinstated.</p>

			maintain existing baseline planting which is not affected by the project.	
6o	6p	4.2.10	The Applicant’s view is that it is not necessary for control to be afforded to the Councils with respect to the establishment and monitoring of aftercare, for mitigation and Biodiversity Net Gain. The Applicant is a responsible developer who regularly undertakes construction projects of this nature nationally and is experienced in satisfying planning requirements and its obligations under its transmission licence.	SCC considers that sufficiently robust control mechanisms need to be put in place, as the local authorities are effectively responsible for monitoring the implementation of the scheme as consented by the Secretary of State, and ensuring, on behalf of local communities & local taxpayers, that, in practice, rather than just on paper, the impacts of the scheme are effectively and robustly mitigated. LV04 and LV05 do not go far enough.
6q	6r 5. Finalisation of Management Plans and Discharge of Requirements	5.2.2	The Applicant understands that where the Councils refer to a “two stage” process they are requesting a further DCO requirement to be added whereby each of the Management Plans must be re-approved (presumably with additional detail and controls) by the Councils as part of the discharge of requirements prior to construction commencing. The Applicant does not consider that a “two-stage” process for the Management Plans is necessary or appropriate	SCC considers that the outline framework that management plans need to deliver to enable the consenting process is not the same as that which is required to deliver the project on site post-consent. It is not about ‘re-approving’. SCC considers that the detailed management plans will need to flow from a robust framework of consent stage management plans, be informed by the lead contractor (who is not appointed at consenting stage) and be fit to inform the works on site and therefore need to be clear, concise and workable, with clear referencing.

8.11.3 Applicant’s Comments on Other Submissions Received at Deadline 8 [REP9-065]

Table 7: SCC Table of Comments on 8.11.3 Applicant’s Comments on Other Submissions Received at Deadline 8 [REP9-065]				
Ref	Topic	Ref No.	Summary of Comments	SCC’s Comments
7a	LEMP Appendix A	Table 3.1, Matter 2a	<p>The Applicant objects to the statement that there are persisting inconsistencies between the plans and the written documents. The Applicant notes that the DCO application exceeds 10,000 pages, excluding the numerous documents and updates during Examination. Inevitably, some minor inconsistencies will occur between documents. However, the Applicant has addressed all of these as soon as they have been identified, either through updates to documents or through the Errata List (document 8.4.3 (C)). The Applicant is not aware of any outstanding inconsistencies between documents.</p>	<p>Please see SCC’s previous comments on inconsistencies in SCC’s Deadline 6 Submission – Evidence relating to the Landscape and Ecological Management Plan [REP6-054]. While SCC welcomes that some points within this document have been addressed (1.1.a, 1.1.h, and 1.2). The remaining points of this document (1.1.b-g, 1.3, 1.4, 1.5. 1.6, 1.7 and 1.8) were not addressed by the Applicant and therefore the conclusion in 1.9 still stands that the current LEMP [REP9-039] is not fit for purpose as a final control document. The Errata List [REP9-054] does not address the issues raised either.</p> <p>It is appreciated that this is a highly complex application on a large scale. This can however not justify a tolerance for inconsistencies. SCC (Landscape) considers the opposite to be the case. Because this is a complex and large-scale project, it is essential that details line up, as the resulting effects will be widely experienced and could vary greatly depending on whether attention to detail was exercised or not. SCC (Landscape) does not consider the inconsistencies raised, for example with regards to capturing the vegetation baseline and presentation, to be minor, as they undermine the reliability of the documents and therefore their fitness for purpose.</p>

<p>7b</p>	<p>Archaeological Mitigation Strategies</p>	<p>Table 3.1, Matter 1.4</p>	<p>The mitigation identified in the OWSI is based on the interim trial trenching results, which except from the final phase of trenching, have all been supplied to the Local Authority Advisors. The Local Authority Advisors were also issued with the daily communications about the trenches during the site work to confirm that each trench could be closed. The targeting of anomalies with trenches and the testing of areas free of anomalies has largely verified the reliability of the non-intrusive surveys with sufficient confidence to allow recommendation of mitigation for each area to adequately mitigate any removal and damage to archaeological remains.</p> <p>The Applicant will continue to engage with the Local Authority Advisors, including following the issue of the final trial trenching report (due in March 2024) to refine the locations and scope of mitigation as would be set out within the Detailed Written Scheme</p>	<p>SCC (Archaeological Service) would note that the archaeological work undertaken to date have been to inform on the principle of the development, to understand the potential impacts on archaeology within the undergrounding areas.</p> <p>The areas that have been subject to trenched archaeological evaluation have shown that there are below-ground heritage assets of archaeological significance. Further trenched archaeological evaluation would be required in the first instance to define areas for archaeological mitigation, to mitigate the impacts of development. To ensure an accurate record of the archaeology is made before its destruction.</p> <p>SCCAS comments <b>[REP7 – 034]</b> when providing comments on the OWSI, have stated that further archaeological assessment can be undertaken as post-determination archaeological evaluation. This would enable the appropriate levels of mitigation to be determined, proportionate to the impacts of the development, as well as allow for a better understanding for how archaeology should be timetabled and costed within the scope of works to ensure there are no unexpected delays to project delivery.</p>
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			of Investigation (DWSI).	
7c	Trial trench evaluation	Table 3.1, Matter 1.5 – 1.10	See the response to 1.4 above. All of the trial trenching results have been provided to the Local Authority Advisors along with daily communication during the site work about the results on site as part of confirming that each trench could be closed. The Applicant is in the process of producing the final trial trenching report, due in March 2024, however the proposed mitigation set out in the OWSI has already taken into account the results of the final phase of trial trenching. The Applicant will continue to engage with the Local Authority Advisors to refine the locations and scope of mitigation as would be set out within the DWSI. The underground cable sections that are excluded from further mitigation are warranted based on a lack of results from non-intrusive survey and trial trenching. The approach of not trial trenching areas within the overhead line sections is based on a proportionate approach set out	SCC (Archaeological Service) would direct to the response to 1.4 above.



		<p>within the Archaeological Framework Strategy (AFS) [APP-186] and given the very limited disturbance of soil within these sections. Applying an Archaeological Monitoring and Recording approach for these areas is entirely appropriate for mitigating removal and damage to any potential buried archaeology in such limited areas. The methodology for the trial trenching was set out within the DWSI produced for the site work. This explained that the opening and closing of trial trenches in the same day was based on health and safety concerns regarding leaving trenches open overnight and also to reduce the impacts of the works to the landowner and of the land use of these fields. The Applicant maintains that it does not consider that further trial trenching is required on the project, and that the proposed mitigation is appropriate, based on the result of both the desk and site surveys and the limited soil</p>	
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			disturbance that would occur in the overhead line sections.	
7d	Trenchless crossing	Table 3.1, Matter 1.11	The River Stour valley has been subject to extensive geotechnical ground investigation and the results used to inform a detailed/enhanced deposit model interpreted by geoarchaeological specialists. The same level of detail is not available for the River Box valley given the limited ground investigation data at this location. The Applicant has proposed geoarchaeological mitigation in both locations, focussed on the drill pits (ground that would be disturbed). This mitigation will help to enhance the deposit models at both the Rivers Stour and Box whilst retrieving organic material for laboratory analysis. Further text on the latter has been added to the OWSI at Deadline 9 (document 7.10 (D)).	<p>SCC (Archaeological Service) would note that requirements for palaeoenvironmental and geo-archaeological assessment and mitigation as set out in the OWSI will need to be agreed in subsequent Detailed Written Schemes of Investigation/s. Which will need to be undertaken by a specialist geoarchaeologist and a palaeoenvironmental archaeologist.</p> <p>Given that assessment would immediately run into mitigation there would need to be an appropriate on-site provision to gather an appropriate number of samples taken to allow for mitigation (agreed with SCCAS, EPS and Historic England). This would need to be detailed in the relevant DWSI.</p>
7e	Introduction	Table 3.1,	(1a and 1b) Paragraph 1.2.6 of the OWSI (document 7.10 (D)) has been amended to make it clear that the trial trenching was focused on the	SCC (Archaeological Service) would note that:

		<p>Matter 1a</p>	<p>underground cable, the CSE compounds, GSP substation and the main site compound off the A134. Text has also been added to say that some trenches were not excavated due to ecological constraints.</p> <p>(1c) Paragraph 1.3.2 of the OWSI (document 7.10 (D)) has been updated with the correct reference to the East of England Archaeological Research Framework.</p> <p>(1d) The Applicant considers its approach to mitigation set out for the overhead line sections is appropriate and that the proposed Archaeological Monitoring and Recording will suffice in mitigating impacts to any archaeological remains present.</p> <p>(1e) Section 7.3 of the OWSI (document 7.10 (D)) has been updated to include details that will be provided within the geoarchaeological DWSI, with the exception of the need for further assessment, which has been provided already based on the available data.</p>	<p>(1a-1d) There is no provision for additional trenching in area G6 to assess the archaeological potential. There is high archaeological potential in this area.</p> <p>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.</p> <p>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>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:</p> <p><b>Post-determination Geophysical Survey</b></p> <p>Geophysical survey will be required in locations where it has not been previously possible. This would need to be undertaken a 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.</p>
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				<p>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.</p> <p>Understanding the archaeological resource by post-determination works outlined above will enable the archaeological resource to be accurately quantified, this will then enable the appropriate level of archaeological mitigation to be determined, as well as a better understanding of how archaeology should be timetabled and costed within the scope of works to ensure there are no unexpected delays to project delivery.</p> <p>(1c) SCCAS welcome amendments here</p> <p>(1f) tree planting causes below-ground impacts on archaeology, tree root growth can extend into archaeological features and as well as causing direct physical damage to the archaeology, root growth causes changes in soil-hydrology and soil-chemistry.</p> <p>The archaeological potential of formerly wooded areas is unknown, SCCAS would advise appropriate archaeological assessment of these areas, as well as evaluation and mitigation of any new areas of tree planting/habitat creation.</p> <p>(1h) the amendments to 1.2.6 and 1.2.7 only summarise the archaeological work, they do not summarise the archaeology that has been identified. SCCAS would encourage the addition of details from the archaeological evaluations.</p> <p>Additionally, figures should be included showing the results of the geophysical surveys with the results of the trenched archaeological evaluation over the geophysics.</p>
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7f	Geoarchaeological and Palaeoenvironmental Investigation and Mitigation	Table 3.1, Matter 1j	<p>1ff) Detailed assessment of the palaeoenvironmental resource has been completed. The OWSI addresses mitigation and reporting.</p> <p>(1gg and 1hh) Section 7.3 of the OWSI (Document 7.10 (D)) has been updated to include reference to consultation with the regional Historic England Science Advisor. The results of the geoarchaeological assessment will be made available to the Historic England Regional Science Advisor for comment. Any feedback will inform the DWSI.</p> <p>(1ii) Paragraph 7.3.1 of the OWSI already states that a DWSI will be produced for the geoarchaeological and palaeoenvironmental mitigation.</p>	<p>SCC (Archaeological Service) would note that:</p> <p>1ff) this should clearly state in 7.1.1 that further assessment of the areas impacted by the proposal will be undertaken in order to undertake appropriate mitigation.</p> <p>1gg and 1hh) this should also include reference to the appropriate Historic England Guidance.</p> <p>1ii) this needs to state that the work will be undertaken by a suitably qualified and experienced geo-archaeologist and suitably qualified and experienced palaeoenvironmental specialist.</p>
7g	Dissemination	Table 3.1, Matter 1k	<p>(1oo) The Applicant does not consider it necessary to update the wording in the DCO, as paragraph 8.3.2 of the OWSI (document 7.10 (D)) states that the UPD will make provision for the analysis, publication, timeline and dissemination of results. The OWSI is secured under Requirement 6 of the draft DCO (Document 3.1 (H)), therefore any commitments made</p>	<p>SCC (Archaeological Service) would note that:</p> <p>(1oo) SCCAS disagree with this comment. The OWSI can only secure the production of the UPD and state the place of archive deposition. It cannot secure the implementation of the approved UPD as the work required to produce the Archive Report and publication will only be understood flowing the completion of the PXA. Therefore, SCCAS will advise wording in the DCO for archive report production, publication and archive deposition.</p>

			<p>in the OWSI are already secured as part of the draft DCO (document 3.1 (H)).</p> <p>(1rr) The Applicant considers that paragraph 8.6.1 of the OWSI (document 7.10 (D)) already covers the groups named by SCC regarding outreach and also noting that the paragraph notes that these are only examples and not an inclusive list.</p>	<p>(1rr) The OWSI need to commit to Outreach and confirm who will be responsible for each part of the proposed outreach.</p>
7h	Archiving	Table 3.1, Matter 1l	<p>(1ss) Paragraph 9.1.1. of the OWSI (document 7.10 (D)) has been amended to include PXA and UPD approval prior to archiving agreement and makes the provision for digital archiving.</p> <p>(1tt) Paragraph 9.1.4 of the OWSI (document 7.10 (D)) makes reference to the ‘appropriate repository’, meaning that the project archive would be split with respect to the two counties.</p>	<p>SCC (Archaeological Service) would note that:</p> <p>(1ss) The updated paragraph reads that this “may include digital archiving”. The project will generate a lot of digital information, this is not adequately covered by the OWSI and therefore cannot be considered appropriate treatment of the archive.</p> <p>Appropriate provision would be clear commitment to deposition of the digital archive with ADS or other suitable digital archive and the inclusion of a digital management plan within the OWSI.</p> <p>(1tt) this is in contradiction with paragraph 9.1.2 where it states “The Archaeological Contractor will integrate the archives from all project archaeological mitigation into a single archive” the archive section needs to clearly state the intended archive repository for both Suffolk and Essex.</p> <p>For Suffolk this would be the SCCAS Archaeology Store.</p>