



Babergh District Council and Mid Suffolk District Council (20041302)

Deadline 10 submission for Bramford to Twinstead (EN020002)

The purpose of this submission is to present the councils' response in respect of the following items due at deadline 10:

1. Comments on submissions received at Deadline 9
2. Other matters

RESPONSES

1. Comments on submissions received at Deadline 9

Regarding ecology matters:

Hintlesham Woods

- Para 6.7.3 EM:AB04 We welcome confirmation that the temporary access route will not be used during dusk, dawn or night time hours which will avoid impacts on foraging and commuting bats and are happy for this to be added to the SoCG in relation to vegetation clearance at Hintlesham Woods SSSI.

LEMP

- The length of aftercare is still insufficient to support delivery of BNG and promised condition of habitats so still NOT agreed.
- Para 8.4.12 The text has not been changed re ploughing/subsoiling as part of natural regeneration so this is still NOT agreed.
- Para 9.15 We welcome the commitment that a LA rep will be present at the final inspection before maintenance by the applicant ceases (LV04) but this is still insufficient so NOT agreed.
- Para 9.16 We welcome that the commitment that the applicant will provide copies of the post consent vegetation (aftercare monitoring) surveys to relevant LAs (LV05) but this is still insufficient and NOT agreed.

Regarding landscape and visual matters:



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LEMP

- Para 2.4.2: We welcome the inclusion of landscape architects as one of the environmental specialists employed by National Grid to advise on the design refinements and the micro-siting of project components when appropriate.
- Para 2.5.7: We welcome that a landscape architect is included in the specialists undertaking pre-construction walkover surveys to assist in micro siting the works to minimise tree loss.
- Section: 8.1 General Approach: still appears to cover reinstatement and mitigation planting not compensation planting
- Para 8.1.2 Item 4 in relation to length of aftercare period proposed does not necessarily ensure the baseline position is maintained over time in order for the biodiversity net gain to be secured in the long term. (See ecologist's comments)
- Section 8.2 Landscape and Ecological Reinstatement Plans: this still appears to reference mitigation but not compensation for landscape and visual effects. Para 8.2.7 refers to areas identified for compensation of existing habitats lost during construction but not for landscape and visual effects. The Environmental Gain Report (application document 7.4) gives a short outline of proposed environmental gain in relation to landscape and visual factors but does not elaborate on the quantity of losses, the strategic objectives these discreet projects deliver on nor how they relate to relevant character objectives, for instance.
- Previous comments in relation to the need for the LEMP to remain as an outline document to ensure post DCO control remain.

2. Other matters

Statement of Common Ground: Please refer to the authorities' comments on the SoCG submitted by SCC on behalf of all the host authorities.

Draft DCO: The authorities defer to the comments of SCC and Braintree DC regarding the draft DCO.

