



**Triton Knoll Offshore Wind Farm Limited
Triton Knoll Electrical System**

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**Appendix 34: Statement of
Common Ground between Triton
Knoll Offshore Wind Farm
Limited and Lincolnshire Wildlife
Trust**

Date: 5th January 2016

**Appendix 34 of the Applicant's
Response to Deadline 4**

Triton Knoll Offshore Wind Farm Limited

Triton Knoll Electrical System

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between Triton Knoll Offshore Wind Farm
Limited and Lincolnshire Wildlife Trust

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Deadline 4

5th January 2016

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Offshore Wind Farm Limited
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8

1. CONFIRMATION OF AGREEMENT

Confirmation of Agreement with Lincolnshire Wildlife Trust

Signed:



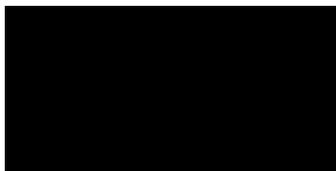
For: Triton Knoll Offshore Wind Farm Limited

Name: Kim Gauld-Clark

Title: Senior Consent Manager

Date: 05 January 2016

Signed:



For: Lincolnshire Wildlife Trust

Name: Paul Learoyd

Title: Chief Executive

Date: 18 December 2015

2. INTRODUCTION

Reason for this Statement of Common Ground

- 2.1 This Statement of Common Ground (SoCG) has been prepared in respect of Triton Knoll Offshore Wind Farm Ltd's (TKOWFL or the Applicant) application for a development consent order (DCO) under the Planning Act 2008 (the Application).
- 2.2 This SoCG with Lincolnshire Wildlife Trust (LWT) is a means of clearly recording any areas of agreement and disagreement between the two parties in relation to the Application. The SoCG has been structured to reflect topics of relevance to LWT in relation the Application.
- 2.3 The structure of the SoCG is as follows:
- Section 1: Introduction;
 - Section 2: Consultation;
 - Section 3: Matters agreed;
 - Section 4: Matters under discussion
 - Section 5: Matters of Disagreement; and
 - Section 6: Appendices
- 2.4 Throughout this SoCG the phrase "It is agreed..." is used as a precursor to any point that has been specifically agreed between the Applicant and LWT. The phrase "It is not agreed..." is used as a precursor to any point that the Applicant and LWT wish to identify as not yet agreed. Points that are "still under discussion" or "not agreed" will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.
- 2.5 It is the intention that this document will facilitate further discussions between both parties and also give the Examining Authority (ExA) an understanding of the level of common ground between both parties from the outset of the examination process.

The proposed development

- 2.6 The proposed development comprises the project elements as described in Volume 2, Chapter 1 and Volume 3, Chapter 1 of the Environmental Statement (ES).

Application elements under the LWT remit

- 2.7 LWT is not a prescribed consultee for the proposed development under section 42 of the Planning Act 2008 and Regulation 9 (1)(a) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. However, the Applicant recognises the importance of LWT as a consultee due to their central role within the Lincolnshire Coastal Grazing Marsh (LCGM) Project alongside Natural England, Lincolnshire County Council and East Lindsey District Council.
- 2.8 LWT is the historic county of Lincolnshire's major voluntary organisation concerned with all aspects of nature conservation. With more than 26,000 members, 1,250 active volunteers and its management of 98 nature reserves throughout the historic county, covering more than 3,300 hectares of terrestrial, fresh water and inter-tidal habitat, LWT provides a voice for wildlife from the Humber to the Wash. The mission of the Lincolnshire Wildlife Trust is to safeguard wildlife in Lincolnshire and in the neighbouring sea and estuaries.
- 2.9 The assessment topics under LWT's remit that have been agreed to include within this SoCG are:
- Volume 1, Chapter 4, Site Selection and Alternatives
 - Volume 3, Chapter 4, Terrestrial Ecology
- 2.10 Although the LWT has an interest in the conservation of the marine environment, for the purposes of the examination of the Triton Knoll Electrical System project they have deferred consideration of marine topics to Natural England, the Marine Management Organisation and Cefas.

3. CONSULTATION

Summary

- 3.1 The Applicant engaged with LWT on the proposed development during the pre-application process, both in terms of informal non-statutory engagement and formal consultation, carried out pursuant to section 47 of the Planning Act 2008 (the 2008 Act). However, given the importance of LWT to the LCGM project and nature conservation in the area generally TKOWFL treated them in the same way as section 42 consultees. A summary of consultation undertaken, specific to an environmental topic, is presented in each of the chapters of the ES, with detail on all the consultation undertaken by the Applicant during the pre-application process presented in the Consultation Report (document reference 5.1). The Consultation Report demonstrates how the Applicant has complied with its duties under the relevant sections of the 2008 Act. Sections 2 and 8 of the Consultation Report detail the formal non-statutory consultation that was carried out and section 6 provides a summary of the formal statutory consultation under the 2008 Act.

EIA Evidence Plan

- 3.2 LWT participated in the pre-application EIA Evidence Plan process which commenced in May 2014. The primary aim of the EIA Evidence Plan was to ensure that TKOWFL, by agreement with the key statutory and non-statutory bodies, provided sufficient and proportionate information and applied appropriate and proportionate methods in the assessment of the TKES works and the application documentation. The EIA Evidence Plan (document reference 8.16) was submitted with the application for development consent and provides detail of the discussions and agreements undertaken and made as part of that process.
- 3.3 As part of the process LWT was represented on the Terrestrial Ecology and Offshore Ecology review panels. However, for the purposes of the examination of the project, LWT have deferred their considerations regarding offshore ecology to Natural England, the Marine Management Organisation and Cefas.
- 3.4 Agreements reached during the EIA Evidence Plan process are set out in this SoCG in order to provide the ExA with a clear understanding of the status of these matters.

Pre-application Consultation

- 3.5 Consultation on the TKES commenced with LWT in July 2012 in relation to the onshore and offshore electrical infrastructure. A further meeting was held in December 2012 in relation to The Wash Offshore Cable Route Feasibility Study.
- 3.6 In its response to the statutory consultation in November 2014, LWT provided comments on the topic of terrestrial ecology following the provision of preliminary environmental information (PEI).
- 3.7 The meetings detailed in Table 1 were held with LWT and other relevant stakeholders to discuss outstanding issues.
- 3.8 It is agreed that Table 1 presents an accurate chronological overview of the key meetings in relation to the Application which were undertaken with LWT prior to the submission of the Application.
- 3.9 It is agreed that the Consultation Report (document reference 5.1) submitted with the application provides an accurate record of the consultation with LWT.
- 3.10 It is agreed that additional topic-specific consultation with LWT, outside of the EIA Evidence Plan process, is captured within the consultation section of Volume 3, Chapter 4, *Terrestrial Ecology* of the ES. It is noted that at the meeting held in December 2013 and in LWT's response to the scoping request, impacts on the Lincolnshire Coastal Grazing Marshes were identified as key issues.

Table 1: Consultation undertaken with Lincolnshire Wildlife Trust pre-application

Date	Form of consultation	Activity/Summary	Application Reference for further details
July 2012	Meeting	Onshore and offshore cable route discussion	N/A
December 2012	Meeting	Onshore and offshore cable route discussion	N/A
December 2013	Meeting	Onshore cable route discussion	Volume 3, Chapter 4 of the ES (Table 4-2).

15-May-2014	Review Panel Meeting	Triton Knoll Evidence Plan kick-off meeting	EIA evidence plan (doc ref 8.6) Appendix I; Annex C1
29-July-2014	Review Panel Meeting	Terrestrial Ecology Review Panel	EIA evidence plan (doc ref 8.6) Appendix I; Annex B
28-Jan-2015	Lincolnshire Coastal Grazing Marsh Meeting	Discussion of LCGM	N/A

Post-application Consultation

- 3.11 The Applicant made initial contact with LWT in relation to the preparation of a SoCG in late May 2015, following the Secretary of State's acceptance of the Application. It was agreed that drafting a SoCG would be appropriate as a means of making a clear statement to the ExA appointed for the Application on the key issues during the early stages of the examination.
- 3.12 The ExA requested that the applicant and the LWT prepare a SoCG in its Rule 6 letter on the 30th July 2015, to be submitted into the examination at Deadline I, on the 5th October 2015.
- 3.13 The Applicant met with LWT on 10th August 2015 to discuss a first draft of the SoCG and the relevant representations submitted to the Planning Inspectorate.
- 3.14 The Applicant met with LWT on 23rd September 2015 to discuss a second draft of the SoCG, with a further telephone conference held on 22nd October 2015 to finalise the text. Final edits were agreed via email prior to the submission at Deadline II.
- 3.15 Following the Issue Specific Hearing held on 17th November 2015, a further meeting was held on 3rd December 2015 to discuss all outstanding issues.

4. MATTERS AGREED

Site Selection and Alternatives

- 4.1 This section of the SoCG sets out those aspects of the Application that are agreed in relation to the site selection and alternatives.
- 4.2 It is agreed that LWT was consulted on the site selection and design of the Application as summarised in the Alternatives Consultation Report, Appendix B of the Site Selection and Design Report (document reference 8.17).
- 4.3 It is agreed that paragraphs 4.25 – 4.79, Volume 1, Chapter 4, *Site Selection and Alternatives* of the ES provide a reasonable summary of the Interface Selection Assessment, including the update of the Interface Selection Assessment assumptions. However, LWT note that they are not in a position to confirm the efficacy of the process as this lies outside of their remit.
- 4.4 It is agreed that the site selection and alternatives process has resulted in an Interface Point at Bicker Fen that is not of concern to the LWT.
- 4.5 It is agreed that the site selection and alternatives process has resulted in a substation location that is not of concern to the LWT.
- 4.6 It is agreed that the site selection and alternatives process has resulted in a location for the IEC that is not of concern to LWT.
- 4.7 It is agreed that suitable mitigation measures can be implemented at the landfall during the construction and restoration phases of the project to reduce the significance of effect on biodiversity to negligible (see Appendix 1).
- 4.8 It is agreed that suitable mitigation measures can be implemented in grazing marsh habitats along the cable route, during the construction and restoration phases of the project, to reduce the significance of effect on biodiversity to minor adverse (see paragraph 4.33 below).
- 4.9 Notwithstanding this, LWT's preference would be for the cable route to be located outside of the LCGM project target area at Burgh Le Marsh. It is also acknowledged that LWT have expressed the preference that the field located at TF 485 628 (known as Field 6) be crossed trenchlessly or, as an alternative and less favourable option to a trenchless crossing, that the cable corridor be reduced to 40m wide and moved to closely follow the road edge

Terrestrial Ecology

- 4.10 This section of the SoCG sets out those aspects of the Application that are agreed in relation to terrestrial ecology.
- 4.11 Where the agreements set out in the following sections refer to sections of the ES, it is agreed that those statements apply equally to the equivalent data, descriptions or analyses set out in any relevant technical reports, survey reports or any other application documents, unless otherwise stated.

Policy Context

- 4.12 It is agreed that the National Policy Statements (NPS) for Overarching Energy (EN-1), Renewable Energy (EN-3) and Electricity Networks Infrastructure (EN-5), are the overriding policy documents in relation to the Project.
- 4.13 It is agreed that NPS EN-1, EN-3 and EN-5 provide for flexibility in the project design at the point of consent.
- 4.14 It is agreed that NPS EN-1 and EN-3 advocate the use of the ‘Rochdale Envelope’ approach to allow the assessment of effects in relation to the scope of the project design by reference to the maximum extents or dimensions, subject to the imposition of relevant controls in the draft DCO and DML (paragraphs 4.2.7 to 4.2.8 of EN-1 and paragraphs 2.6.42 to 2.6.43 of EN-3).
- 4.15 It is agreed that Policy Context sections of each of the relevant ES chapters listed in paragraph 2.9, have considered and referred to relevant specific policy and guidance documents and relevant national and international legislation in relation to the potential impacts identified.

Project Description

- 4.16 It is agreed that the project details described in Volume 3, Chapter 1, *Onshore Project Description* of the ES (document reference 6.2.3.1) provide a clear and thorough description of the proposed development.
- 4.17 It is agreed that the project details of the proposed development are appropriately reflected in the parameters as set out in the draft DCO (document reference 3.1 – *Part 1 Authorised Development*).

Scope and Methodology

- 4.18 It is agreed that the EIA process, as set out in Volume 1, Chapter 3, *Approach to EIA* of the ES (document reference 6.2.1.3) is an appropriate approach for the identification and assessment of the potential impacts and effects of the proposed development.
- 4.19 It is agreed that the study area defined in paragraphs 4.24 – 4.26 and Table 4-3 of Volume 3, Chapter 4 of the ES is acceptable for the purposes of describing the baseline environment and understanding the potential impacts on terrestrial ecology from the proposed development.
- 4.20 It is agreed that the impact assessment methodology presented in paragraphs 4.27 – 4.45 of Volume 3, Chapter 4 of the ES is based on current best practice for the assessment of impacts on terrestrial ecology and that it is fit for purpose for use in the assessment process.
- 4.21 It is agreed that the use of aerial Phase 1 surveys for areas where survey access was not provided by landowners, as set out in paragraphs 4.46 – 4.47 of Volume 3, Chapter 4 of the ES, is an appropriate technique to identify broad habitat types within the existing environment. It is recognised however that this technique has limitations as described in paragraphs 4.46 and 4.47 of Volume 3, Chapter 4 of the ES and may not always correctly categorise habitats.
- 4.22 It is agreed that the project-specific data sources and field surveys presented in Tables 4-7 – 4-8 and paragraphs 4.48 – 4.50 of Volume 3, Chapter 4 of the ES are appropriate for the purposes of establishing the existing terrestrial ecology environment, bearing in mind the limitations in relation to aerial habitat survey undertaken on land where land owners refused access permission.
- 4.23 It is agreed that the Applicant has used the available survey data (Phase 1 habitat survey data), post application, to determine the value of habitats within the onshore development area using the Local Wildlife Site (LWS) identification criteria, as requested by LWT. It is agreed that the use of this method can provide further information that is useful within the evaluation process. It is also agreed that the output of this exercise was the identification of no areas of habitat that are of LWS quality, thereby confirming the valuations provided within Table 4-12 of Volume 3, Chapter 4 of the ES.

Existing Environment

- 4.24 It is agreed that the descriptions given in paragraphs 4.51 – 4.98 of Volume 3, Chapter 4 of the ES provide a reasonable characterisation of the terrestrial ecology
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baseline appropriate to inform the assessment bearing in mind the limitations in relation to aerial Phase 1 surveys undertaken on land where permission was not obtained to carry out ecological surveys.

- 4.25 It is agreed that the specific fields identified in Appendix 1 are those within the LCGM project target areas that require specific mitigation.

Key Parameters for Assessment and Embedded Mitigation

- 4.26 It is agreed that a maximum adverse scenario has been established according to the 'Rochdale Envelope', using project specification details given in Volume 3, Chapter 1 of the ES.
- 4.27 It is agreed that the maximum adverse scenarios as defined in Table 4-16 of Volume 3, Chapter 4 of the ES, are clearly described, sufficiently justified and appropriate for assessing the potential impacts on terrestrial ecology during all phases of development.
- 4.28 It is agreed that there are no other scheme permutations, when considering the project details, which could lead to any greater terrestrial ecology effects than the maximum adverse scenarios set out in Table 4-16.
- 4.29 It is agreed that paragraphs 4.101 – 4.105 and Table 4-17 of Volume 3, Chapter 4 of the ES describe the mitigation measures that have been embedded into the project design and demonstrate how the design has minimised harm to the environment.
- 4.30 It is agreed that the mitigation outlined for specific fields within the LCGM project target areas is described appropriately in Appendix 1.
- 4.31 It is agreed that the ecological receptors set out in paragraphs 4.106 – 4.108 and Table 4-18 of Volume 3, Chapter 4 of the ES have been appropriately scoped out of the assessment, bearing in mind the limitations of the survey data.

Assessment of Impacts

- 4.32 It is agreed that paragraphs 4.109 – 4.162 of Volume 3, Chapter 4 of the ES present an assessment of the potential impacts on terrestrial ecology arising from the construction, operation and decommissioning of the development, in accordance with the requirements of relevant policy and legislation. The exception being the exclusion of Lincolnshire Coastal Grazing Marsh from the operational phase assessment (see paragraph 6.3)

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- 4.33 It is agreed that all potential impacts, following mitigation, are predicted to be **Minor Adverse** or below, as summarised in Table 4-33 of Volume 3, Chapter 4 of the ES and are therefore **Not Significant**.
- 4.34 It is acknowledged that LWT would prefer the field at TF 485 628 (known as Field 6) to be crossed trenchlessly, which would ensure impacts on breeding lapwing could be discounted completely.
- 4.35 It is agreed that impacts judged to be minor adverse during the construction period, despite the implementation of mitigation, would reduce to negligible or nil following the restoration of habitats. It is noted that the assessment of potential impacts is based on the ecological surveys that have been carried out. Where permission was not granted for survey, pre-construction surveys may highlight habitats of nature conservation importance that meet Local Wildlife Site criteria that would require appropriate mitigation and restoration. It is agreed that the presence of protected species would require appropriate mitigation to ensure legal compliance.

Mitigation and Monitoring

- 4.36 It is agreed that the measures shown in Appendix 1 are appropriate to mitigate for impacts on specifically identified fields within the LCGM project target areas following the completion of construction.
- 4.37 It is agreed that grassland fields within the LCGM target areas that have not been identified for specific mitigation can be adequately restored through the general restoration protocols as described in paragraphs 2.50 – 2.53 of the Outline Construction Method Statement (CMS) (Document Reference 8.17).
- 4.38 It is agreed that the Outline LSEMP (document reference 8.8) and Outline CMS (document reference 8.7.1) provide suitable indicative forms of the final LSEMP and CMS; although it is noted that these documents will be updated to reflect agreements reached in Statements of Common Ground prior to the completion of the examination.
- 4.39 It is agreed that the Outline Soil Management Plan (SMP) (document reference 8.7.5) provides a suitable indicative form of the final SMP.
- 4.40 It is agreed that given the generally low level of significance ascribed to the predicted changes to terrestrial ecology as a result of the construction, operation and decommissioning of the project, no specific monitoring is required, other than in regard to ensuring restoration has been successful.

Cumulative Impacts

- 4.41 It is agreed that LWT has no comments to make on the cumulative assessment and the projects scoped into the cumulative impact assessment, as detailed in Table 4-31, Volume 3, Chapter 4 of the ES.

Inter-related Effects

- 4.42 It is agreed that LWT has no comments to make on the assessment undertaken and detailed in Table 12-7, Volume 2, Chapter 12.

Draft Development Consent Order (DCO)

- 4.43 This section of the SoCG sets out those aspects of the Application that are agreed in relation to the draft DCO (document reference 3.1).
- 4.44 It is agreed that the wording of **Requirement 13** of the draft DCO (document reference 3.1) secures an Ecological Management Plan (EMP), which accords with the principles set out in the Outline LSEMP (document reference 8.8).
- 4.45 It is agreed that the wording of **Requirement 14** of the draft DCO (document reference 3.1) secures a Code of Construction Practice (CoCP) which accords with the Outline CoCP (document reference 8.7); a Construction Environmental Management Plan (CEMP) which accords with the Outline CEMP (document reference 8.7.9); and the relevant specific plans listed in Requirement 14(2)(a) which accord with the suite of Outline plans submitted with the application (document references 8.7.1 – 8.7.10).
- 4.46 It is agreed that the wording of **Requirement 19** of the draft DCO (document reference 3.1) secures adequate protection for European Protected Species (EPS) and the need for pre-construction survey work to confirm the presence or absence of EPS prior to the commencement of each stage of the onshore works. It is agreed that this requirement also appropriately secures a scheme of protection and mitigation measures if any EPS are found during the pre-construction surveys.
- 4.47 It is agreed that the wording of **Requirement 20** of the draft DCO (document reference 3.1) secures the reinstatement of any land used temporarily for construction of the onshore works.

5. MATTERS UNDER DISCUSSION

- 5.1 The Applicant and LWT are currently discussing measures to promote biodiversity gain. These discussions will be concluded with the submission of a technical note outlining the Applicant's position in relation to biodiversity gain.

6. MATTERS OF DISAGREEMENT

- 6.1 The parties have not reached agreement on the positioning of the cable route, as it passes through the LCGM project target area of Burgh Le Marsh. LWT would prefer that the cable route completely avoids the target area to prevent impacts on grazing marsh priority habitat and areas in which this habitat could be created in the future. It is the Applicant's view that the design of the cable route as described in Volume 1, Chapter 4 *Site selection and alternatives* of the ES (Document Reference 6.2.1.4) has taken into account a full range of considerations including environmental constraints such as ecological sensitivity (especially grasslands), archaeologically sensitive areas, existing land use considerations, the Lincolnshire Wolds Area of Outstanding Natural Beauty and the historic environment, particularly National Trust's Gunby Hall Estate. Environmental considerations were considered alongside cost considerations such as length of cable route. The consideration of the various factors determined the course of the cable route, which would cause the least harm to the environment overall, despite the known presence of grazing marsh habitats.
- 6.2 LWT would prefer the field located at TF 485 628 (known as Field 6) to be crossed by trenchless means to avoid impacts on breeding lapwing. It is the position of the Applicant that appropriate mitigation has been provided that will allow for the area to be restored effectively (see Appendix 6 of the Response to Deadline 2), whilst ensuring that the requirements of Section 9 of the Electricity Act (i.e. to ensure all elements of the transmission network are economic and efficient) are met. Field 6 is not designated at an international, national or local level, does not provide a place of shelter for any European Protected Species and has shown evidence of becoming a habitat of conservation interest in the short term (i.e. the field was still in arable production in 2009), therefore it is the Applicant's view that the engineering and scheduling risks associated with a long trenchless crossing is not warranted. It should be noted however that the agreement reached in paragraph 4.8 notes that the mitigation laid out in Appendix 1 is sufficient to ensure that impacts of the project are no more than "minor adverse" and therefore not significant in EIA terms.
- 6.3 A second option put forward by LWT would be to reduce the cable corridor to 40m wide and closely follow the road edge. This route would have a very much reduced impact on the wetland features and important central breeding habitat. This would cause more disturbance than directional drilling and is not LWT's preferred option but, if timed correctly, LWT considers that there is less risk of losing the breeding waders compared to current proposals to trench through the middle of the site. It is the Applicant's view that this option is problematic as it does not allow for the

stand-off necessary to work adjacent to the existing drainage ditch; it requires a change in angle of the cable (just to the south of Field 6) which makes the pulling of cables more technically difficult and slower (due to friction created on the cable) and does not alter the impacts predicted either during construction or post-restoration (based on the mitigation as laid out in Appendix 1).

- 6.4 Lincolnshire Coastal Grazing Marsh is excluded from the operational phase assessment by the Applicant. The justification for this being that the restoration or creation of grazing marsh habitats throughout the Development Area will not be impeded during the operational phase. LWT do not agree that the creation of grazing marsh habitats in arable fields within LCGM project target areas will not be impeded because there will be a restriction on excavating within the cable corridor and specific mitigation is not being implemented within all the fields within the Burgh le Marsh target area to ensure that the cable corridor does not become a preferential drainage pathway. LWT are uncertain whether the fields will be able to hold water in the future should the opportunity arise to create grazing marsh habitat. Opportunities for the creation of grazing marsh habitat within the cable corridor will therefore be restricted. The Applicant notes that the control of water levels will largely be controlled by the impounding of water within adjacent drainage ditches. This technique is used to create grazing marsh without the removal of field drains, suggesting strongly that if the trench infill material became a preferential drainage pathway the ability to raise the water table level would not be restricted. The Applicant also notes that the onshore development area only covers a relatively small percentage of the fields crossed (commonly between 5 and 40%) and therefore there remains considerable areas over which scrapes and foot drains could be dug.

APPENDICES

Appendix 1 – Specific Mitigation Measures for LCGM Target Areas			
Site	Description	Area (ha)	Mitigation and Discussion
1	<p>Arable field (Site A in Outline CMS)</p> <p>Transition Joint Bays (TJBs) at landfall are located within this field</p>	<p>Field size = 35.49</p> <p>Area within the proposed Order Limits = 2.99</p>	<ul style="list-style-type: none"> • Raise the land within which the TJBs will be located by ~1.5 m to ensure that the TJBs are located above ground level (area of ~0.5 ha) and therefore above any standing water; • Ensure specification of infill material that is used for the ground raising will be of suitable pH and structure (e.g. will not lead to siltation of drainage network due to high percentage of fines); • Seed the area of raised ground (~0.5 ha) with an appropriate native wild flower rich grassland mix that reflects similar habitats in the surrounds using, where possible, a seed source of local provenance. Seeding will take place following completion of TJBs (i.e. earlier than end of construction phase) and the grassland managed appropriately during the operational life of the project; • Drainage of raised ground to ensure that the run-off neither hampers agricultural production in the field or leads to loss of water from the system that could not be impounded in the future should grazing marsh be created (i.e. drainage to be channelled into existing ditch system to enable control by weir if necessary); • Trench infill specification (for excavation underneath current ground level) to be confirmed as being equally or less permeable than surrounding soils;

			<ul style="list-style-type: none"> Measures to be implemented to ensure that in-filled material does not become a preferential drainage pathway (i.e. clay stanks, geosynthetic clay liners, plugs in duct ends) specified by a drainage engineer at detailed design phase (i.e. following site investigation).
2	Arable field (Site B in Outline CMS)	<p>Field size = 30.42</p> <p>Area within the proposed order limits = 3.27 (this includes an access route where no effects are predicted)</p>	<ul style="list-style-type: none"> Trench infill specification to be confirmed as being equally or less permeable than surrounding soils; Measures to be implemented to ensure that in-filled material does not become a preferential drainage pathway (i.e. clay stanks, geosynthetic clay liners, plugs in duct ends). Exact measures to be specified by a drainage engineer at the detailed design phase following site investigation; Trenchless crossing operation (to cross Roman Bank) to begin at least 50m back from Roman Bank to avoid movement of water across the existing ditch boundary.
3	Permanent pasture (Site C in Outline CMS)	<p>Field size = 8.08</p> <p>Area within the proposed order limits = 1.02</p>	<ul style="list-style-type: none"> A trenchless crossing will be used to cross this field as this will retain grassland; IEC construction haul road (~60m) will, if possible, be constructed of temporary panels on top of existing grassland with any undulations infilled with sand bags or sand screed (or similar) to ensure even surface; To enable remaining grassland to be managed appropriately, livestock will be granted access to cross the Order Limits (through

			<p>gated access in fences) when it is possible to be safely and carefully managed. Grass sward within the Order Limits will be managed appropriately using mechanical measures (e.g. grass mowing, strimming etc.);</p> <ul style="list-style-type: none"> • Use netting or other barrier to screen the working area from surrounding area if required (to be determined by the Ecological Clerk of Works (ECoW)). • If temporary panels cannot be used for the haul road, restoration of the site will take place as soon as possible following its removal. • Where stripped, topsoil will be re-instated and seeded with an appropriate grass seed mix to be agreed with the landowner. This seed mix could include species of botanical interest should the landowner wish to diversify the grass sward.
4	Wet grassland (Site D in Outline CMS)	<p>Field size = 4.84</p> <p>Area within the proposed order limits = 0.88</p>	<ul style="list-style-type: none"> • Measures to be implemented to ensure that in-filled material does not become a preferential drainage pathway (i.e. clay stanks, geosynthetic clay liners, plugs in duct ends) specified by a drainage engineer at detailed design phase; • Trench infill specification to be confirmed as being equally or less permeable than surrounding soils; • IEC construction haul road (~145m) will, if possible be constructed of temporary panels laid on surface without soil stripping; • Soil storage areas to be covered by bog mats, panels or geotextile to retain grassland below (i.e. no soil stripping). Soil stripping only to take place in areas in which cables are to be buried;

			<ul style="list-style-type: none"> • To enable remaining grassland to be managed appropriately, livestock will be granted access to cross the Order Limits (through gated access in fences) when it is possible to be safely and carefully managed. Grass sward within the Order Limits will be managed appropriately using mechanical measures (e.g. grass mowing, strimming etc.); • Use netting or other barrier to screen the working area from surrounding area if required (to be determined by the ECoW). • Restore the site once cable ducts and cables have been installed (i.e. topsoil reinstated and seeded soon after construction in section is complete. An appropriate seed mix will be used to maintain or enhance current floral composition in discussion with the landowner). If haul road is required at a later date (i.e. once construction of the IEC is complete) temporary track way to be used.
5	Grazing marsh listed on Priority Habitat Inventory	<p>Field size = 8.49</p> <p>Area within the proposed order limits = 0.86</p>	<ul style="list-style-type: none"> • Measures to be implemented to ensure that in-filled material does not become a preferential drainage pathway (i.e. clay stanks, geosynthetic clay liners, plugs in duct ends) specified by a drainage engineer at detailed design phase; • Trench infill specification to be confirmed as being equally or less permeable than surrounding soils; • Haul road (~160m) to be constructed of temporary panels laid on surface without soil stripping. • Soil storage areas to be covered by bog mats, panels or geotextile to retain grassland below (i.e. no soil stripping). Soil stripping only to

			<p>take place in areas in which cables are to be buried;</p> <ul style="list-style-type: none"> • To enable remaining grassland to be managed appropriately, livestock will be granted access to cross the Order Limits (through gated access in fences) when it is possible to be safely and carefully managed. Grass sward within the Order Limits will be managed appropriately using mechanical measures (e.g. grass mowing, strimming etc.); • Use netting or other barrier to screen the working area from surrounding area if required (to be determined by the ECoW); • Restore the site once cable ducts and cables have been installed (i.e. topsoil reinstated and seeded soon after construction in section is complete. An appropriate seed mix will be used to maintain or enhance current floral composition in discussion with the landowner). If haul road is required at a later date temporary track way to be used.
6	Grazing marsh (not on Priority Habitat Inventory) (Site E in Outline CMS)	<p>Field size = 4.90</p> <p>Area within the proposed order limits = 1.78</p>	<ul style="list-style-type: none"> • Working width to be narrowed to 40m when crossing the foot drains located within the field; • Drains bordering the field (reference numbers DK_179, DK_181 and DK_183) will be crossed trenchlessly. The trenchless crossing launch and exit pits will be situated at least 10m away from the ditch bank. This will ensure that measures taken by the LCGM project to raise water table levels (e.g. soil compaction of field edges) will not be compromised by the installation of cable ducts; • Measures to be implemented to ensure that in-filled material does

			<p>not become a preferential drainage pathway (i.e. clay stanks, geosynthetic clay liners, plugs in duct ends) specified by a drainage engineer at detailed design phase;</p> <ul style="list-style-type: none"> • Trench infill specification to be confirmed as being equally or less permeable than surrounding soils; • Haul road (~340m) to be constructed of temporary panels laid on surface without soil stripping; Soil storage areas to be covered by bog mats or geotextile to retain grassland below (i.e. no soil stripping). Soil stripping only to take place in areas in which cables are to be buried; • To enable remaining grassland to be managed appropriately, livestock will be granted access to cross the Order Limits (through gated access in fences) when it is possible to be safely and carefully managed. Grass sward within the Order Limits will be managed appropriately using mechanical measures (e.g. grass mowing, strimming etc.); • Use netting or other barrier to screen the working area from surrounding area if required (to be determined by the ECoW); • To schedule the works appropriately to minimise impacts to wintering/breeding birds and to avoid times of inundation. During detailed construction scheduling duct installation will be scheduled to begin within this field between August and October to minimise potential disturbance of breeding lapwing; • Following the detailed electrical design identifying joint pit and link
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			<p>box locations, Field 6/Site E will be included within the consideration of secondary constraints to enable, if possible, the avoidance of these structures within the field boundary. This being to reduce the potential for disturbance of breeding birds during routine maintenance inspections;</p> <ul style="list-style-type: none"> • To reinstate the scrapes/blind ended ditches as currently in place to the current layout. The location, depth and form of scrapes will be accurately plotted via a topographical survey prior to construction beginning within the field to ensure that the current landscape can be restored accurately; • To discharge any water pumped from excavations to scrapes/blind ended ditches should this be determined as a benefit to biodiversity; • Restore the site once cable ducts and cables have been installed (i.e. topsoil reinstated and seeded soon after construction in section is complete. An appropriate seed mix will be used to maintain or enhance current floral composition in discussion with the landowner). If haul road is required at a later date temporary track way to be used; • Following restoration the re-instated foot drains will be refilled with water to an agreed level. This activity would only be carried out should the relevant authority grant a temporary abstraction licence. The need for this measure would be determined by the ECoW and the Agricultural Liaison Officer in discussion with the landowner. •
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<p>7</p>	<p>Grazing marsh listed on Priority Habitat Inventory</p>	<p>Field size = 2.44</p> <p>Area within the proposed order limits = 1.05 (this includes an access route where no effects are predicted)</p>	<ul style="list-style-type: none"> • Measures to be implemented to ensure that in-filled material does not become a preferential drainage pathway (i.e. clay stanks, geosynthetic clay liners, plugs in duct ends) specified by a drainage engineer at detailed design phase; • Restore the site once cable ducts and cables have been installed (i.e. topsoil reinstated and seeded soon after construction in section is complete. An appropriate seed mix will be used to maintain or enhance current floral composition in discussion with the landowner). If haul road is required at a later date temporary track way to be used; • Launch/retrieval pit and trench infill specification to be confirmed as being equally or less permeable than surrounding soils; • Soil storage areas to be covered by bog mats, panels or geotextile to retain grassland below (i.e. no soil stripping); • To enable remaining grassland to be managed appropriately, livestock will be granted access to cross the Order Limits (through gated access in fences) when it is possible to be safely and carefully managed. Grass sward within the Order Limits will be managed appropriately using mechanical measures (e.g. grass mowing, strimming etc.); • Use netting or other barrier to screen the working area from surrounding area if required (to be determined by the ECoW).
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