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Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.8.6: Applicant's Response to Interested Party Comments on Management Plans

Final Issue A
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1. Introduction

1.1 Overview

- 1.1.1
- National Grid Electricity Transmission plc (here on referred to as the Applicant) has made an application for development consent to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The Bramford to Twinstead Reinforcement (‘the project’) would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km (18 miles), the majority of which would follow the general alignment of the existing overhead line network. The application for development consent includes five management plans, which would be secured through Requirement 4 of the draft Development Consent Order (DCO) (**Document 3.1 (F)**), and the Archaeological Framework Strategy [**APP-186**] and the Outline Written Scheme of Investigation (OWSI) [**REP5-016**], which are secured by Requirement 6 of the draft DCO.
- 1.1.2
- This document comments on submissions received from Interested Parties regarding proposed changes to the management plans. This document includes in Chapter 4, comments on the tracked change version of the Landscape and Ecological Management Plan (LEMP) [**REP5-035**] which was submitted on behalf of Suffolk County Council (SCC), Essex County Council (ECC), Babergh and Mid Suffolk District Council (BMSDC) and Braintree District Council (BDC) at Deadline 5.
- 1.1.3
- SCC also noted in their Response to Action Points from Issue Specific Hearing 2 (paragraph 1.2) in the Response to Action Points from CAH1, ISH2, ISH3 and ISH4 [**REP5-034**] that the suggested changes to the LEMP that are required in order to make it function as an outline LEMP also apply to the Construction Traffic Management Plan (CTMP), the Construction Environmental Management Plan (CEMP), the LEMP and its appendices, the Public Rights of Way Management Plan (PRoWMP) and the Outline Written Scheme of Investigation (OWSI). The Applicant is unable to comment on this further, as other than a request that the other management plans are made outline instead of final, it is unclear which references in the LEMP would apply to these other management plans. The Applicant also notes that the OWSI [**REP5-016**] is an outline plan with the details provided later in the form of Detailed Written Scheme of Investigation, in accordance with Requirement 6 of the draft DCO (**Document 3.1 (F)**).
- 1.1.4
- This document covers submissions that have been received from Interested Parties on the CEMP (**Document 7.5 (C)**) and its Appendix B: Register of Environmental Actions and Commitment (REAC) (**Document 7.5.2 (D)**), CTMP (**Document 7.6 (C)**) and the LEMP [**REP3-034**]. In terms of the remaining management plan documents:

• CEMP Appendix A: Code of Construction Practice (CoCP) [**REP3-026**] - No specific comments have been received on this, and therefore it is not included within this document;

• Materials and Waste Management Plan [**REP3-032**] - No specific comments have been received on this, and therefore it is not included within this document;

• PRoWMP [**REP3-056**] – the only comment raised by Interested Parties was to provide further clarification regarding the assumed closure sequencing. This has been provided in the Technical Note on Public Rights of Way Closure Sequencing (**Document 8.5.9**) and therefore is not further addressed within this document;

• Archaeological Framework Strategy [**APP-186**] - No specific comments have been received on this, and therefore it is not included within this document; and

• OWSI [**REP5-016**] - Comments were received on behalf of Essex and Suffolk County Council on the 18 December 2023. The Applicant will review these comments and respond further at Deadline 7. Therefore, the OWSI is not included within this document.
- 1.1.5
- The Applicant has also received a number of documents from the Local Planning Authorities in response to the discussions on the draft Statement of Common Ground Local Authorities (**Document 7.3.1 (C)**), some of which may apply to the Management Plans. The Applicant is reviewing these comments and will respond further at Deadline 7 regarding any further changes that may be required.

1.2 Structure of this Report

Table 1.1 sets out the structure of this report, which addresses each management plan in a separate chapter.

Table 1.1 – Structure of this Report

Chapter	Content
1: Introduction	This sets out the purpose of the document and presents the structure of the report.
2: Construction Environmental Management Plan	This sets out the Applicant’s review of proposed changes to the CEMP (Document 7.5 (C)) and the REAC (Document 7.5.2 (D)).
3: Construction Traffic Management Plan	This sets out the Applicant’s review of proposed changes to the CTMP (Document 7.6 (C)).
4. Landscape and Ecological Management Plan	This sets out the Applicant’s review of proposed changes to the LEMP and its appendices, which will be updated and submitted at Deadline 7.

2. Construction Environmental Management Plan

2.1 Introduction

Table 2.1 sets out the Applicant’s review of submissions received from Interested Parties on the CEMP (**Document 7.5 (C)**). The Applicant commented on the SCC Responses to Comments on Local Impact Report [**REP4-008**] at Deadline 5 in relation to the CEMP so these are not duplicated in Table 2.1. Table 2.1 does not cover comments received from third parties on the working hours, as the Applicant has been commenting separately on these, including in the Technical Note for Noise Sensitive Receptors (**Document 8.8.7**) submitted at Deadline 6.

Table 2.1 – Comments on the CEMP (including the CoCP and REAC)

Ref	Matter	Submission from Third Party	Applicant's Comments
SCC Comments on any other submissions received at Deadline 4 [REP5-033]			
Table 3 (3a)	REAC	SCC welcomes the changes in layout to the REAC. The added columns for Location, Project Phase, Delivery Mechanism and DCO Requirement or Schedule are useful.	The Applicant notes this response and has no comment to make.
Table 3 (3b)	REAC	The references with regards to the delivery mechanisms could be more detailed, ideally down to paragraph numbers, where further detail can be found; for documents that have several Appendices, any relevant Appendix should be listed.	The Applicant considers the delivery mechanism column is presented in the same manner as the Yorkshire GREEN example requested by the ExA. The Applicant does not consider it necessary to provide paragraph numbers, where these could change reference during the course of examination. The purpose of this column is to demonstrate that commitments are secured.
BMSDC Comments on Other Submissions Received at Deadline 4 [REP5-030]			
N/A	Section 61 consent	It is our understanding that scheduled overruns/out of hours working will be subject to Control of Pollution Act (CoPA) 1974 S61 prior consent with the submission of an application detailing times of work, plant details and noise/vibration levels. BMSDC shall require these submissions without exception at least 28 days prior to commencement. This would be essential in the case of horizontal directional drilling which is identified as being likely to require night-time working to complete trenchless crossings	Section 14.4 of the CEMP (Document 7.5 (C)) outlines the need for Section 61 consents. This states in paragraph 14.4.1 that the contractor will be required to submit applications for Section 61 consents, variations and dispensations under CoPA 1974 for construction activities that are: likely to result in a significant effect at a sensitive receptor (see Environmental Statement (ES) Chapter 14: Noise and Vibration [APP-082] for details); or likely to be undertaken outside of the Core Working Hours (within the parameters of DCO Requirement 7 of the draft DCO (Document 3.1 (F))).
Natural England's Comments on Information Provided at Deadlines 3 and 4 on Soils and Best and Most Versatile Agricultural Land [REP5-037]			
2.1, 2.17 / 3.1, 3.2	Soil Management Plan	The inclusion of the soil management measures as a soil management plan in the CEMP is acceptable, as per our advice provided in our Written Representation. However, the CEMP is not informed by site specific soil information, where such data is available.	The Applicant does not consider that the CEMP (or a Soil Management Plan) needs to contain the details from the soil surveys. The Main Works Contractor would draw on the original soil survey results to inform the site-specific soil storage and reinstatement measures.
2.2	Soil types	It is acknowledged that soil surveys have not been completed for all land inside the Order Limits, and that soil surveys will be undertaken in ‘areas of underground cable where soil stripping is proposed’. However, identified soil types at the cable sealing end (CSE) compound and substation locations should provide an indication of soil resilience. This includes expected excavated topsoil and subsoil volumes and thus the required storage space, including any need to separate soils of differing type, which should be considered in the soil management measures.	<p>The Applicant has undertaken soil surveys for all areas within the Order Limits where there would be a permanent impact on soils (at the CSE compounds and the grid supply point (GSP) substation and also at locations where the temporary works would disturb large areas of soil i.e. the underground cable swathe and the temporary access route off the A131,</p> <p>The Applicant does not consider that the CEMP (or a Soil Management Plan) needs to contain the details from the soil surveys. The Main Works Contractor would draw on the original soil survey results to inform the site-specific soil measures and would identify soil storage areas as part of the detailed designs.</p> <p>The estimated volumes of soil storage have been considered as part of the development of the Order Limits, as shown on the Design and Layout Plans Cable Working Cross Section [APP-027]. This shows that soil storage would typically be along the working length for the cable sections. However, there are exceptions to this where there are existing site constraints, for example an additional storage area is shown on Sheet 14 of Figure 4.1 [PDA-002] which allows for soil storage from where the Order Limits have been narrowed to avoid impacts on woodland at Alder Carr.</p>
2.3	Good Practice Guide for Handling Soils	Natural England notes that Good Practice Guide for Handling Soils (Ministry of Agriculture, Fisheries and Food, 2000) has now been superseded by guidance from the Institute of Quarrying (2021).	Noted. The Applicant has included the updated reference in the CEMP at Deadline 6 (Document 7.5 (C)). The Applicant does not consider that this updated guidance affects the conclusions of the ES or change the measures set out in Chapter 11 of the CEMP (Document 7.5 (C)).

Ref	Matter	Submission from Third Party	Applicant's Comments
2.4	Soils during extreme weather conditions	It is expected that soil handling would be confined to the drier summer period to minimise risk of soil damage (April through September). This would minimise the need to recondition soils, which requires additional space and time. This is particularly important for land to be restored to agricultural use.	<p>The Applicant is not able to restrict all soil handling to April to September as this would have significant implications on the deliverability of this Nationally Significant Infrastructure Project (NSIP) and also when it has made commitments to avoid works in bird nesting season around Hintlesham Woods SSSI. The Applicant considers that there are suitable measures contained within the CEMP (Document 7.5 (C)) to protect soils during construction, including those soils to be restored to agricultural use.</p> <p>The Applicant also notes that its contractors regularly undertake construction of high voltage electricity lines and is used to managing and handling soil on its projects in discussion with landowners, many of which are agricultural holdings. Paragraph 11.3.34 of the CEMP (Document 7.5 (C)) states that '<i>Land used temporarily will be reinstated to an appropriate condition relevant to its preconstruction condition and, where relevant, Agricultural Land Classification grade, including any subsoil drainage, unless otherwise stated within the LEMP.</i>' 'Where relevant' refers to areas where the original land use would not be reinstated, for example in areas where new planting is proposed rather than reinstatement of the original arable use.</p>
2.6, 2.16	Working in relation to frozen ground	Paragraph 11.3.4 of the CEMP states, 'In the case of frozen ground, excavation works may proceed given effective excavation techniques and implementation of safety measures to prevent excavation collapse during thawing, however backfilling of frozen soils will not be possible as required compaction levels will be unachievable. Subsequently the soils will be allowed to fully thaw before commencing backfilling activities.' It is Natural England's advice that soil should not be handled or trafficked over/driven on when the ground is frozen or covered by snow.	The Applicant considers that the wording in paragraph 11.3.4 of the CEMP (Document 7.5 (C)) confirms the method that would be undertaken but also notes that there need to be measures in place to allow for excavation works to proceed during prolonged periods of cold weather where tasks become critical to the programme, for example where needed to meet an agreed outage window.
2.7	Soil scientist role	As detailed in paragraph 11.3.7 of the CEMP, Natural England welcomes the requirement for a Soil Scientist with specified competencies to advise on, and supervise, soil handling activities.	Noted. The Applicant has no comment on this matter.
2.8	Machinery	Paragraphs 11.3.12 - 11.3.13 of the CEMP detail that the topsoil stripping methodology is stated to follow the Defra 2009 Construction Code, however the subsequent paragraph states stripping will include excavators and bulldozers. The Defra 2009 Construction Code states that stripping should be undertaken by an excavator. Any alternative stripping methods proposed need to demonstrate that they can afford the same degree of soil protection as the excavator method.	The Applicant notes that the Institute of Quarrying (2021) includes guidance for both excavators and bulldozers. The Applicant regularly uses bulldozers on the construction and maintenance of long linear high voltage electricity lines and that this does not lead to detrimental effects on soil when handled appropriately.
2.9	Soil stockpile locations	Paragraph 11.3.16 of the CEMP states, 'where the working area allows'. Natural England advise that the soil volume to be excavated should already have been determined and inform the required working area for soil stripping and storage.	The estimated volumes of soil storage have been considered as part of the development of the Order Limits, as shown on the Design and Layout Plans Cable Working Cross Section [APP-027]. This shows that soil storage would typically be along the working length for the cable sections. However, there are exceptions to this where there are existing site constraints, for example an additional storage area is shown on Sheet 14 of Figure 4.1 [PDA-002] which allows for soil storage from where the Order Limits have been narrowed to avoid impacts on woodland at Alder Carr.
2.11	Soil records	Natural England advise that further detail should be added to paragraph 11.3.26 of the CEMP and advise soil stockpiles should be correctly labelled with the footprint, location, volume and type clearly recorded.	Text has been added to paragraph 11.3.26 of the CEMP (Document 7.5 (C)) at Deadline 6 to state ' <i>The records will also include details of the location, volume and soil type to aid reinstatement.</i> '
2.12	Soil storage	Paragraph 11.3.27 of the CEMP provides some detail of how soils will be stored. Natural England advise soils should be stored 'like on like' with topsoil stored on topsoil, and subsoil on subsoil.	Paragraph 11.3.27 of the CEMP (Document 7.5 (C)) already states that ' <i>Topsoil can be stored either on topsoil (of the same type) or on subsoil. However, as subsoil should only be stored on subsoil, topsoil will first be stripped from any land to be used for subsoil storage.</i> ' In addition, paragraph 11.3.23 also states ' <i>A separator geotextile will be placed beneath topsoil stockpile areas.</i> ' Therefore, no further change to the CEMP is considered necessary.
2.13	Soil methodology	As detailed in paragraph 11.3.28 of the CEMP, Natural England support the use of the loose tipping method (as described in the Defra 2009 Construction Code). This method is appropriate only when the soils are in a dry and friable condition.	Noted. The Applicant has no comment on this matter.
2.14, 2.19	Soil surveys	Natural England welcome that the land undergoing temporary disturbance will be restored to its baseline agricultural land classification (ALC) grade. This will be informed by the site-specific soil and ALC surveys.	Noted. The Applicant has no comment on this matter.
2.16	Soil methodology	Reference AS01 of the CoCP states that the CEMP includes 'how the different topsoil and subsoil resources present will be stripped and stockpiled.' However, only one methodology is presented for stripping; stockpiling and reinstatement.	AS01 in the CoCP [REP3-026] is a high-level commitment developed at the start of the project. Further details on the methodology are included in the CEMP (Document 7.5 (C)).

Ref	Matter	Submission from Third Party	Applicant's Comments
2.10 and 2.16	Soil storage	Good practice measures should also include: <ul style="list-style-type: none"> Soil stockpiles in place for longer than six months should be seeded. 	Paragraph 11.3.24 of the CEMP (Document 7.5 (C)) states that ' <i>Management of stockpiles will be undertaken to reduce the risk of silt-laden runoff or dust generation, for example through the use of coverings or through seeding where stockpiles will be in place for longer time periods.</i> ' The Applicant notes that other methods including covering could be used instead of seeding. The Applicant also considers that the Main Works Contractor would determine the timing based on risk of dust considering factors such as exposure, season, soil type etc as to when measures are required.
2.16	Working methods	Good practice measures should also include: <ul style="list-style-type: none"> No trafficking/driving of vehicles/plant or materials storage to occur outside designated areas, nor on reinstated soil (topsoil or subsoil). 	Paragraph 11.3.39 of the CEMP (Document 7.5 (C)) already states that ' <i>Once reinstated, the area will be kept clear of traffic.</i> ' The Applicant notes that it cannot commit to no trafficking/driving of vehicles/plant or materials storage to occur outside of soil storage areas, as there will be some light vehicles that may drive over unstripped soil e.g. during landscape planting or testing of the line.
2.16	Soil handling	Good practice measures should also include: <ul style="list-style-type: none"> Only direct movement of soil from donor to receptor areas (no triple handling and/or ad hoc storage). 	Paragraph 11.3.27 of the CEMP (Document 7.5 (C)) states that ' <i>Soil will be stored within the Order Limits, where it can be left undisturbed and will not interfere with site operations.</i> ' In addition, as paragraph 11.3.16 notes that the general principle will be that wherever the working area allows, the stripped material will be removed and stockpiled adjacent to the excavation, i.e. close to the donor site. There will be exceptions where site constraints may require soil to be stored away from the donor site, for example at Alder Carr noted above and also avoiding stockpiles within the floodplain.
2.5 and 2.16	Soil handling	Good practice measures should also include: <ul style="list-style-type: none"> No soil handling to be carried out when the soil moisture content is above the lower plastic limit (the soil is plastic). 	Paragraph 11.3.19 of the CEMP (Document 7.5 (C)) states ' <i>if sustained heavy rainfall is experienced resulting in soil materials becoming plastic (as assessed by hand), soil stripping activities will be put on hold until the ground has had at least a full dry day or has met the agreed moisture content criteria. Where this is not possible, weather-specific methods will be agreed with the soil scientist prior to work commencing.</i> ' The latter would apply when tasks become critical to the programme of this NSIPt, for example for meeting an agreed outage window.
2.15 and 2.16	Weather conditions	Good practice measures should also include: <ul style="list-style-type: none"> Soils should only be moved under the driest practicable conditions and this must take account of prevailing weather conditions. (rainfall "stop" criteria should be included). 	The Applicant cannot commit to stopping work if there is adverse weather as this would put the programme of this NSIP at risk. Such a restriction would create a risk that the Applicant does not meet the required outage windows and therefore the construction programme.
2.16		Good practice measures should also include: <ul style="list-style-type: none"> No mixing of topsoil with subsoil, or of soil with other materials. 	The methodology set out in the Chapter 11 of the CEMP (Document 7.5 (C)) already describes the method to avoid any mixing of topsoil with subsoil. The Applicant cannot commit to not mixing soil with other materials, as other materials may be required as part of the re-conditioning of the soil or to enable soil stabilisation.
2.16	Soil storage areas	Good practice measures should also include: <ul style="list-style-type: none"> Soil only to be stored in designated soil storage areas. 	The Main Works Contractor would identify the locations for storing soil within the working area. For the cable sections, this would typically be parallel to the cable trenches as show on the Design and Layout Plans Cable Working Cross Section [APP-027].
2.16	Daily records	Good practice measures should also include: <ul style="list-style-type: none"> Daily records of operations undertaken, and site and soil conditions should be maintained. 	The Main Works Contractor would keep daily records of activities undertaken on site. The Applicant does not consider that it is necessary to maintain daily records of soil conditions.
2.18	Best and most versatile (BMV) soil	In the absence of a detailed, site-specific soil and ALC survey in the ES and assuming that all mapped ALC Grade 3 land is BMV (i.e. Subgrade 3a), it is not possible to provide an accurate baseline and demonstrate the likely potential impacts. So, whilst this may make the mitigation precautionary, it means that the project is unable to show how it avoids impacts to BMV soils nor the design of potential mitigation to safeguard the soil resources.	The Applicant respectfully disagrees with this statement. The Applicant has assumed that all the soil within the Order Limits could be BMV land, an assumption that has been backed up by the site-specific surveys undertaken at the GSP substation, CSE compounds and in the underground cable sections. ES Chapter 11: Agriculture and Soils [APP-079] has rightly considered a realistic worst case which assumes BMV throughout an area that is in the most part under intensive agricultural production. The Applicant considers that the good practice measures would avoid damage to soil, whether this is classified as BMV land or not.
2.20	Permanent loss of BMV land	In the Applicant's response to the issue raised in Natural England's Written Representations regarding permanent loss of soil and how ALC grades have been considered, reference is made to Document 6.2.3, which provides information of the different factors that were considered in the routing of the project. Whilst Natural England acknowledges 'the difficulty in avoiding BMV land within the study area, when almost all land is identified as BMV land,' (Document 8.5.2, p.32), review of Document 6.2.3 shows no areas of ALC land were provided for the options, so it is not possible to compare between options.	High level options appraisal work is based on the Department for Environment, Food and Rural Affairs (Defra) ALC mapping layers for BMV land. As this does not differentiate between 3a and 3b, a precautionary case is made that Grade 3 is BMV land. Using this data source, the four route corridors considered in the Route Corridor Study (October 2009) [REP3-015] would all lie wholly within BMV land, except for an area at and around Hintlesham Woods SSSI and to the south of Ansell's Grove (where a trenchless crossing is proposed to avoid habitats). Therefore, BMV land was not a material differentiating factor between the options which is why this is not referenced in the summary tables.

3. Construction Traffic Management Plan

3.1 Introduction

Table 3.1 sets out the Applicant’s review of submissions received from Interested Parties on the CTMP (**Document 7.6 (C)**). The Applicant commented on the SCC Responses to Comments on Local Impact Report [**REP4-008**] at Deadline 5 in relation to the CTMP so these are not duplicated in Table 3.1, other than where amendments are to be made at the next update of this document.

Table 3.1 – Comments on the CTMP

Ref	Matter	Submission from Third Party	Applicant’s Comments
BDC Deadline 5 Submission - Comments on other submissions received at Deadline 4 [REP5-031]			
TT1.13.21	Highways Monitoring and Enforcement Strategy	<p>The Council maintains our response at Deadline 4 [REP4-049] where we set out the current position on these issues, which are summarised below:</p> <ul style="list-style-type: none">• Surveying of the condition of the highway network for remediation. Partially resolved. Further information and discussions are needed.• That the local highway authorities (LHA) should be the party responsible for discharging the CTMP and agreeing any changes to the CTMP. This appears to be resolved.• Absence of monitoring of construction and workforce traffic. It is understood that TT02 will ensure GPS monitoring of construction routes and there is an indication that construction traffic will be recorded at paragraph 7.2.4. Further information is sought on what traffic is to be monitored and how vehicle numbers will be reported to the highway authorities. Not considered to be resolved.• Absence of commitment to achieve staff modal share through commitment to minibuss and car sharing. Not resolved; there continues to be no commitment to achieve the staff mode share.• Absence of commitments to survey staff movements. The CTMP includes commitment towards surveying of staff movements in the form of a travel survey. This appears to be partially resolved, but further commitment to monitoring of total staff vehicle movements.• Absence of reporting on CTMP monitoring and non-compliance to highway authorities. Not resolved: there is no commitment to report the findings of the monitoring to the highway authorities; nor any meaningful process for remedial actions if the CTMP fails to achieve its targets.• Approval of construction traffic routes. Resolved through inclusion of Construction Routes at Appendix A.	<ul style="list-style-type: none">• Surveying the condition of the highway for remediation: Section 5.2 of the CTMP (Document 7.6 (C)) includes details of the visual and photographic surveys that would be undertaken and shared.• Changes to the CTMP: The Applicant has confirmed that the LHA would be the party responsible for discharging and agreeing changes to CTMP (Document 7.6 (C)), as detailed in paragraph 7.6.6. Agreed that this is resolved.• Monitoring of construction and workforce traffic: As detailed in paragraph 6.3.5 of the CTMP (document 7.6 (C)), the Applicant would require staff to sign in and out of each work location. These records will be used to assess vehicle movements and occupancy rates and the Applicant can provide this information to the LHA. A change has been made to paragraph 6.3.5 of the CTMP at Deadline 6 to confirm that information on staff traffic will be shared with relevant highway authorities.• Monitoring of HGVs: Paragraph 7.2.5 of the CTMP (Document 7.6 (C)) includes details of the monitoring and reporting for compliance with the CTMP, including requirements to; provide GPS tracking for the main works contractor’s HGVs, monitor vehicle numbers between the strategic road network and the site and use the Construction Traffic Routes shown in Figure 1 of Appendix A of the CTMP. This is considered a sufficient and proportional level of monitoring. A change has been made to paragraph 7.2.5 of the CTMP to commit to sharing information on compliance with HGV routes and discussing further action where required.• Modal share/staff movements: Section 6.4 of the CTMP (Document 7.6 (C)) has been updated at Deadline 6 to provide detail of monitoring, including; the mode of transport; number of crew van movements; number of people sharing cars (average minimum occupancy of 1.3) and crew vans (average minimum occupancy of 4) and car park usage. The Applicant has also committed to a target of 70% of staff travelling to sites using crew vans, with this being a new commitment introduced at Deadline 6. The Applicant is willing to also periodically share information on modal share with the LHAs and discuss potential measures to increase modal share where these targets are not met.• Staff survey: Staff vehicle movements will be monitored for the purposes of assessing whether targets on modal share are being met as described above and as now stated in paragraph 6.3.5. the Applicant is happy to share this information with the local highway authorities.• CTMP monitoring and non-compliance: as outlined under ‘monitoring of workforce traffic’ and ‘monitoring of HGVs’ above, further commitments to monitor and report CTMP compliance have been added to the CTMP at Deadline 6 (Document 7.6 (C)). The Applicant is happy to share this data. The non-compliance procedure is detailed in Section 7.3.• Approval of construction traffic routes: agreed. The construction traffic route proposed by the LHAs at Sudbury, which avoids the one-way system by utilising Head Lane/Shawlands Avenue, has been included in the CTMP at Deadline 6 (Document 7.6 (C)).
4.2.1	Parking of construction staff vehicles	Monitoring, reporting and enforcement of inappropriate parking should be included in CTMP.	Measures for controlling parking on site are already included in paragraph 6.3.10 of the CTMP (Document 7.6 (C)).

Ref	Matter	Submission from Third Party	Applicant's Comments
4.2.1	70% of staff travel by crew van.	Include appropriate targets, monitoring and controls within CTMP to ensure modal split.	The Applicant has added a target to the CTMP for 70% of staff to travel using crew vans and 4 personnel per van to address this comment. This has been added to the CTMP at Deadline 6 (Document 7.6 (C)).
6.2.1 – 6.2.4	Construction Routes	<p>For the construction routes within the CTMP that represent the following:</p> <ul style="list-style-type: none"> • Henny Road, Bell Hill, Springett's Hill and Lamarsh Hill on sheet 3 of the construction routes. • Bures Road to Henny Road shown on Sheet 3 of the construction routes. • Church Road through Twinstead on Sheet 4 of the construction routes. • Church Road to Wickham St Paul on Sheet 4 of the construction routes. <p>It appears that ES Appendix 12.1 – Traffic and Transport Significance of Effects Tables [APP-134], assumes no HGV traffic will utilise these routes, only staff movements; this is noteworthy due to the routes' rural characteristics and narrowness. The CTMP needs to ensure that general HGV traffic does not utilise these routes to access the site. Church Road and Twinstead Road in particular are very narrow, and do not conveniently facilitate any form of two-way traffic with limited potential for passing. Mitigation in the form of passing bays may still be required.</p> <ul style="list-style-type: none"> • Old Road to Wickham St Paul on Sheet 4 of the construction routes. <p>The ES assumes very low levels of HGV traffic will utilise these routes; this is noteworthy due to the routes' rural characteristics and narrowness. The CTMP needs to ensure that no more than the low levels of HGV traffic identified within the ES uses these routes to access the site and be able to evidence the same. Old Road is very narrow and does not conveniently facilitate two-way traffic with limited potential for passing.</p>	<p>Heavy Goods Vehicles (HGV) routes are detailed within Figure 1 of the CTMP (Document 7.6 (C)), and the CTMP is secured via Requirement 4 to the draft DCO (Document 3.1 (F)). In accordance with good practice measure TT02 in the CoCP [REP3-026], the Main Works Contractor will implement a monitoring and reporting system to check compliance with the measures set out within the CTMP (Document 7.6 (C)). This will include the need for a GPS tracking system to be fitted to HGV owned and operated by the Main Works Contractor to check for compliance with authorised construction routes.</p> <p>The Construction Routes located on Church Road, Twinstead Road and Old Road are considered suitable for their proposed use, however the intention would be that construction traffic would primarily use the temporary access route leading to the A131 at H-AP20.</p>
7.2.1 (4.1)	Clarification on the term 'minibus' and staff vehicles used	<p>The Council welcomes the clarification regarding the crew van. No evidence has been submitted that supports the 70% assumption nor any controls within the CTMP that will ensure it is delivered.</p> <p>Mainly as a result of the two assumptions around car share and staff travel times, the peak figure of 528 staff is assessed as 32 peak hour vehicle movements, which is a reason why a traffic impact has not been identified. It is difficult to see how this can be considered a worst-case assessment.</p>	<p>To address these comments the CTMP (Document 7.6 (C)), has been updated at Deadline 6 to change the word 'minibus' to 'crew vans' throughout. It has also been updated to include a target for 70% of staff to use crew vans and commitments for staff vehicle and occupancy use to be monitored and discussed with the relevant highway authorities if targets are not met.</p> <p>The Applicant considers that this addresses this comment.</p>
7.2.1 (4.1)	Outline CTMP	The Council welcomes the inclusion of the construction routes within the CTMP. The Council maintains its position as set out at Paragraph 21.1.4 of our Deadline 4 Response [REP4-049] that there should be a further iteration of the CTMP, when more information is available from the contractor for discharge by the Highway Authorities.	<p>Response noted regarded inclusion of the Construction Routes in Appendix A of the CTMP (Document 7.6 (C)).</p> <p>The Applicant does not consider it necessary to commit to a future CTMP, as it does not consider additional information regarding construction traffic and routing is required to be submitted outside of the existing processes available through the DCO. The Applicant has, however, updated the CTMP at Deadline 6 to address local highway authority comments.</p> <p>If changes are necessary to the CTMP following Examination, then these would be subject to LHA engagement to agree changes before commencement of works as detailed in paragraph 7.6.6 of the CTMP (Document 7.6 (C)).</p>
SCC Response to Action Points from CAH1, ISH2, ISH 3 and ISH 4, received at Deadline 5 [REP5-034]:			
2.10	Abnormal Indivisible Loads (AIL)	The movement of AILs is generally controlled through separate consenting processes, such as Electronic Service Delivery for Abnormal Loads. However, issues with the capacity of Suffolk's bridge stock make it, in SCC view, imperative that a feasible route is determined at this stage, to ensure that access for AILs is at least feasible as issues such as weak bridges and highway constraints identified. The Applicant has proposed control via the	The Applicant has submitted Reports on Abnormal Indivisible Load Access for Cable Drums, Transformers and Shunt Reactors at Deadline 6 (Document 8.8.11). This contains an assessment of the AIL routes which have been added to Appendix A of the CTMP at Deadline 6 (Document 7.6 (C)).

Ref	Matter	Submission from Third Party	Applicant's Comments
		specification of routes within the CTMP, which is acceptable subject to the above.	
2.11-2.12	Timing of HGVs	<p>SCC would consider that to give respite to local communities, HGV movements should be restricted to:</p> <ul style="list-style-type: none"> Monday to Friday 0600-2000. Saturday 0600-1400. <p>With exceptions as listed in the which if accepted by the decision makers should give the Applicant the flexibility that they require to deliver the project.</p>	<p>Restricting delivery times is not considered necessary or proportional given the level of traffic expected; the temporary use; the urgency of the programme, the linear nature of the project and due to the construction of temporary access routes.</p> <p>The delivery hours in the TA [APP-061] are considered to be a reasonable worst case; this is very different to being able to secure HGV times on a day-to-day basis. Numerous factors can occur on a particular day that would affect the time an HGV arrives at site, from incidents on the road, delays to deliveries at ports, personnel related delays and so on. An unintended consequence of a requirement to restrict HGV movements may mean that vehicles need to park to wait for 'core hours' with adverse impacts on capacity and safety.</p>
2.13	HGV Access Routes	SCC has raised concerns regarding the suitability of some of the HGV access routes in the Local Impact Report [REP1-044] . The information provided by the Applicant at D4 assists the authority in understanding the movements, but our position remains that controls are necessary to ensure that movements do not exceed those assessed in the Transport Assessment and ES. Our view is that this is consistent with EN1 2023 in 5.14.14 The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic.	<p>The Applicant considers the TA [APP-061] to be based on a reasonable worst-case assessment but does not consider it to be reasonable, proportional, or necessary to secure the vehicle numbers it was based upon. As concluded in the TA [APP-061], the project would not result in substantial HGV traffic movements.</p> <p>Paragraph 5.13.11 of the 2011 Overarching National Policy Statement for Energy (EN-1), states that requirements may be attached to a consent where there is likely to be substantial heavy goods vehicle (HGV) traffic. The Applicant does not consider the project meets this threshold based on the assessments undertaken. Further, Paragraph 5.14.14 of the proposed revised EN-1 reinforces this point.</p>
2.14	Recovery of expenses due to by extraordinary traffic (Highways Act 1989 s59)	SCC considers it proportionate to include an agreement to recover any costs incurred due to damage resulting from traffic associated with this development and this should be recovered through a side agreement or protective provisions. This formalises the arrangement without recourse to a retrospective application through the courts.	Highways Act 1989 s.59 is an existing statutory provision allowing for recovery of expenses, and hence the Applicant submitted at the ISH3 hearing (and again at the ISH6 hearing) that it is not necessary to replace that provision. In this context, the Applicant refers also to the Applicant's Written Summaries of Oral Submissions to Issue Specific Hearing 6 (Document 8.8.4.2).
2.15	Emissions	SCC considers that emissions from HGVs should be controlled to minimise pollution from construction traffic. This can be achieved by a commitment in the CTMP for all HGVs to be compliant with EURO IV, although accepting that some specialist vehicles may need to be exempt.	<p>Good practice measure GG12 in the CoCP [REP3-026] states that plant and vehicles will conform to relevant standards for the vehicle or plant type as follows:</p> <ul style="list-style-type: none"> Euro VI (NOx and PM) for lorries, buses, coaches and Heavy Goods Vehicles (excluding specialist abnormal indivisible loads).
2.16	Workers	SCC considers that trips resulting from workers employed on this project should be controlled to ensure that trips do not exceed those assessed in the ES or Transport Assessment. This can be through the monitoring and reporting of vehicles arriving and departing the site(s) or recording numbers of workers and the transport modal split to achieve the same.	See response provided for TT1.13.21 above under 'Monitoring of workforce traffic' and 'Modal share / staff movements.'
2.18 (and table page 8)	Monitoring and Reporting	Controls must be supported with sufficient monitoring and reporting to demonstrate compliance with controls. Summaries of the reports should be made public subject to appropriate data protection being applied.	See response provided for TT1.13.21 above under 'Monitoring of HGVs'.
SCC Comments on any other submissions received at Deadline 4 [REP5-033]:			
4.1.	Clarification on the term 'minibus' and staff vehicles used	<p>SCC and ECC welcome the clarification regarding the crew van.</p> <p>No evidence has been submitted that supports the 70% assumption, nor any controls within the CTMP that will ensure it is delivered.</p> <p>Mainly as a result of the two assumptions around car share and staff travel times, the peak figure of 528 staff is assessed as 32 peak hour vehicle movements, which is a reason why a traffic impact has not been identified. It is difficult to see how this can be considered a worst-case assessment.</p>	See response provided for TT1.13.21 above under 'Modal share / staff movements' and 7.2.1 (4.1) above on crew vans and the additional commitment on the percentage of staff using crew vans. The Applicant considers that the TA [APP-061] . and the assumptions used provide a reasonable worst-case assessment.
4.1.	The progress of the CTMP	<p>SCC welcomes the inclusion of the construction routes within the CTMP albeit with the reservations expressed in the LIR [REP1-044] and [REP1-045].</p> <p>SCC considers that with the lack of controls and details regarding monitoring, reporting, and enforcement, the CTMP can only be considered a draft or outline and that there should be a further iteration of the CTMP when more information is available from the contractor for discharge by the Highway</p>	<p>Whilst the Applicant is seeking to update certain aspects of the CTMP in response to comments provided by the Councils, and notwithstanding that in some cases there is a difference of opinion with the Councils as to the nature and/or extent of controls, this does not mean that the CTMP in overall terms is incomplete and/or insufficiently detailed.</p> <p>Indeed, the Applicant considers that the CTMP provides appropriate information and controls for it to be considered "final" at the end of the Examination and certified as such by the Secretary of State.</p>

Ref	Matter	Submission from Third Party	Applicant's Comments
		Authorities. It was assumed that the flexibility sought was included within the Applicant's assumptions made when estimating the parameters assessed in the ES and Transport Assessment.	Should any future changes become necessary that would result in updates being required to the document these would need to be submitted to and agreed by the LHAs, as set out in paragraph 7.6 of the CTMP; or where derogations are necessary then these would be subject to Requirement 1(4) of the draft DCO (document 3.1 (F)). It should be noted that the approach to, and structure of, the CTMP mirrors that adopted on the Applicant's previous DCOs (see, for example, the Richborough Connection Project and Yorkshire Green).
Essex Police SoCG (Document 8.8.8.2)			
3.2	Update to The Road Vehicles (Construction & Use) Regulations 1986	Please note this is 18.75m for a draw bar combination vehicle.	Paragraph 5.3.1 of the CTMP (Document 7.6 (C)) has been amended at Deadline 6 to provide compliance with the update to The Road Vehicles (Construction and Use) Regulations 1986.
SCC Post-Hearing Submission for Third Issue Specific Hearing (ISH3) into Transport and Rights of Way [REP4-021]			
3.1f	Peak and average staff numbers	The peak construction staff numbers are estimated in paragraph 4.4.54 of the TA [APP-061] as 350 for the worst-case alternative scenario and an average of 180 per day [APP-091]. SCC has not seen any details of how this number was estimated or evidenced nor whether this includes visitors and support staff. Suffolk Joint LIR [REP1-045] paragraph 12.63 lists the information considered to be lacking in the application. No additional information has yet been provided to SCC.	<p>The peak construction staff numbers are shown in Illustration 4.1 of the ES Chapter 4: Project Description [APP-072] and have been calculated by an experienced contractor from the Applicant's Framework of approved Contractors, who are competent and experienced in delivering similar projects. The contractor has generated workforce numbers for construction of the project including the temporary access routes, removal of the 132kV overhead line, new overhead lines (pylons and conductors), underground cables including CSE compounds and the GSP substation.</p> <p>Given the low number of workers anticipated and that the Applicant has not identified any likely significant effects in relation to this matter, the Applicant does not consider there to be a need to provide a more detailed workforce profile into Examination or to SCC.</p> <p>Worker numbers are only relevant to the TA [APP-061] insofar as they inform assumptions about vehicle numbers. The vehicle numbers are very conservative so unlikely to be exceeded regardless of whether worker numbers exceed the peak estimated. However, a change has been made to the CTMP at paragraph 6.3.5. to agree to share information on staff numbers per work site with the relevant highway authority on a periodic basis.</p> <p>The CTMP (Document 7.6 (C)) states that '<i>National Grid and its contractor will promote the use of sustainable travel solutions, such as car sharing and use of public transportation. Wherever practicable, operatives will meet at pre-determined locations to share a minibus to the workface to reduce the impact of cars being parked at unsuitable locations.</i>' This sentence should have read 'crew vans' and has been updated in the CTMP at Deadline 6. This demonstrates that the Applicant is committed to reducing vehicle numbers and promoting sustainable travel where practicable. The commitment to shared transport means there is not necessarily a direct relationship between worker numbers and vehicle numbers.</p>
ECC/BDC Deadline 4 Submission - Response to Applicant's comments on BDC/ECC Local Impact Report & Other Documents [REP4-049]			
21.1.3	Specific Comments on the Deadline 3 submission: CTMP	Further clarification is needed over paragraph 7.2.5 on the details that the construction vehicle numbers that are being checked against, along with relevant reporting and enforcement procedures.	This commitment provides details on how the Applicant (and their contractor) would monitor and report deviations from HGV routing secured in the CTMP and discuss further mitigation measures with LHA should they be required. The mention of traffic numbers in the previous version was an error given that traffic numbers are not secured in the DCO. The CTMP (Document 7.6 (C)) has been amended at Deadline 6. However, the Applicant would also record traffic movements at each site and can share this information with the LHA.

4. Landscape and Ecological Management Plan

4.1 Introduction

Table 4.1 sets out the Applicant’s review of submissions received from Interested Parties on the LEMP at Deadline 4 and at Deadline 5. No submissions have been specifically received in relation to the LEMP appendices: Appendix A: Vegetation Retention and Removal Plan [APP-183], Appendix B: Vegetation Reinstatement Plan [REP3-036] and Appendix C: Planting Schedules [APP-185]. However, these will be updated at Deadline 7 to reflect the following changes:

- LEMP Appendix A: Update to include new veteran tree embedded measure and to update vegetation loss assumptions at woodland without an existing maintained swathe to reflect submissions from Interested Parties regarding concerns about a graduated swathe;
- LEMP Appendix B: Update to reflect the changes to the vegetation loss assumptions noted above and to add some additional planting requested by the Local Planning Authorities; and
- LEMP Appendix C: Update to reflect the proposed changes received from the Local Planning Authorities with regards to species types and sizes.

Table 4.1 – Comments on the LEMP

Ref	Matter	Submission from Third Party	Applicant’s Comments
SCC Responses to Comments on Local Impact Report Annex A – Control Document Review in Relation to Landscape and Visual Impacts [REP4-008]			
N/A	General	SCC considers that there are issues with the LEMP, as it is currently presented, which are not acceptable for a final LEMP, in some cases, not even for an Outline LEMP. In addition to the following points, SCC shall provide a tracked-change version of the D3 LEMP for Deadline 5, therefore these comments are unlikely to be comprehensive at this stage.	The Applicant has commented on the points raised at Deadline 5 in the table below underneath the heading Landscape and Ecological Management Plan Document Review [REP5-036].
N/A	Purpose of the LEMP	The purpose of the LEMP should go beyond the construction period and include aftercare and long-term management prescriptions (which are, in fact, included in the document).	No change is proposed to the LEMP. Paragraph 1.3.1 of the LEMP (Document 7.8 (C)) states that the LEMP already ‘sets out how land, vegetation and habitats will be reinstated following construction <u>together with the subsequent aftercare and, where applicable, monitoring arrangements.</u> ’
N/A	Table 3.1	The technical specialists should also include a landscape architect. It should be more clearly defined for which types of works they will be called upon, rather than leaving this to the discretion other personnel.	The LEMP will be amended at Deadline 7 to include a landscape architect in the list of specialists included in Table 3.1. Further clarification will also be added about specialist roles and when these would be called upon.
N/A	Vegetation Reinstatement Plan	The Vegetation Reinstatement Plan indicates the location of the proposed embedded planting at the GSP. There are, however, no indications of how the planting will be arranged or what it will comprise. This means, there is no reassurance as to how effective the planting will be in terms of visual mitigation.	No change is proposed to the LEMP. Reinstatement planting is shown on LEMP Appendix B: Vegetation Reinstatement Plans [REP3-036] and the planting schedules are provided in LEMP Appendix C: Planting Schedules [APP-185] and provide details of the planting mix, sizes and density. The schedule of plants, numbers, species, sizes and density are also covered within Requirement 9 of the draft DCO (Document 3.1 (F)). The Applicant considers these to be sufficient to show the extent of reinstatement that is proposed. The Applicant also notes that the GSP substation has been consented by BDC via a planning application (planning application reference 22/01147/FUL) under the Town and Country Planning Act.
N/A	Vegetation Reinstatement Plan	The Vegetation Reinstatement Plan is presented at a scale that is not accurate enough for the implementation stage. While various plantings are labelled, not much assistance is provided to remind the user of the drawings, what these labels stand for and where exactly further prescriptions might be found, for ease of use.	No change is proposed to the LEMP. LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] is presented at a scale that is considered suitable for the application for development consent. The Applicant welcomes further feedback on which labels are unclear and will then review whether changes can be made.
N/A	Paragraph 6.3.7	Tree protection approach for veteran trees states that the project ‘has considered’ the Standing Advice by Natural England and the Forestry Commission. The Applicant needs to confirm that it will adhere to this advice or demonstrate why this is not possibly on a case-by-case basis.	No change is proposed to the LEMP. Table 6.2 in the LEMP [REP3-034] sets out the measures with regards to veteran trees and has been written in accordance with the Standing Advice by Natural England and the Forestry Commission. This sets out the specific measure proposed for each veteran tree on a case-by-case basis, noting only one veteran tree would be affected by the project, and this is subject to a specific mitigation measure (EM-G13) agreed with BMSDC. This is the same approach agreed with Natural England and the Forestry Commission on the Southampton to London Pipeline Development Consent Order, see Appendix C of the LEMP on that project (project reference EN070005 [REP6-028]).
N/A	Paragraph 6.4.2	SCC considers that the protection of hedgerows too vague.	Section 6.4 of the LEMP [REP3-034] describes measures for the protection of hedgerows that do not require to be removed. The Applicant will update the text further at Deadline 7 to include the following details as requested by the Councils. a. The topsoil (including any bank) from beneath the hedgerow would be stripped and stored separately. b. Vegetation and topsoil from any associated ditch would be stripped and stored separately.

Ref	Matter	Submission from Third Party	Applicant's Comments
			c. Soil storage areas would be clearly signed and demarcated to prevent any mixing with other soils.
N/A	Section 6. Vegetation Retention	SCC considers that the Vegetation Retention is inadequate (paragraphs 6.2.5-6.2.10). Where protection is required, i.e., if there is any risk that the retained vegetation may be damaged during construction, appropriate protection, i.e., Heras style fencing, shall be installed. There should be a clear approach to situations, when vehicle access with RPAs (paragraphs 6.2.10 and 6.2.13) may be deemed necessary and therefore acceptable and any works within the root protection area (RPA), including protective measures must be supervised by a suitably qualified Arboriculturist.	No change is proposed to the LEMP. As stated in paragraph 6.2.5 of the LEMP [REP3-034] , and in accordance with the British Standard 5837 (2012) Trees in Relation to Design, Demolition and Construction, the type of barrier will be provided dependent on the level of risk posed to the RPA and to suit the location in accordance with clause 6.2.2.3 of BS 5387:2012, as agreed with the arboriculturalist on site. The Applicant considers that paragraphs 6.2.13 to 6.2.15 of the LEMP [REP3-034] provide a clear approach to vehicle access within an RPA.
N/A	Planting Schedules	The plant schedules are divided into vegetation types. However, there is no indication that the species listed for each type represent a palette that will be fine-tuned to reflect the potentially varying conditions of the different landscape character areas (based on landscape character types) within the project area.	The species proposed in LEMP Appendix C: Planting Schedules [APP-185] were chosen based on the results of the ecology surveys that were undertaken for the project and species present within the landscape. The Applicant considers the species mixes proposed to be suitable to the landscape and environment within which they would lie. However, the Applicant will also add a sentence to the LEMP at Deadline 7 to say that the species in Appendix C: Planting Schedules can be fine-tuned during the discussions with the Local Planning Authorities as part of the discharge of Requirement 9 of the draft DCO (Document 3.1 (F)).
N/A	Species selection	The species mixes contain species that are not usual for the wider project area, such as <i>Tilia cordata</i> in Hedgerow Mix H2. <i>Sambucus nigra</i> does not need to be included in the mixes (for example in H1 Species rich Hedgerow mix), as it is likely to self-seed.	The species proposed in LEMP Appendix C: Planting Schedule [APP-185] were chosen based on the results of the ecology surveys that were undertaken for the project. <i>Tilia cordata</i> (small leaved lime) was recorded and has been included within Hedgerow Mix H2, which is species rich hedgerow mix with trees. <i>Sambucus nigra</i> has also been included as it is fast growing and good for birds, bees and butterflies. However, the Applicant will update the proposed species in Appendix C: Planting Schedule at Deadline 7 to remove <i>Sambucus nigra</i> from the proposed mix.
N/A	Species mixes	The percentages of certain species within some species mixes seem inappropriate, such as 20% of <i>Prunus spinosa</i> (suggest 5%).	<i>Prunus spinosa</i> (blackthorn) and <i>Crataegus monogyna</i> (hawthorn) typically make up the majority of hedgerow mixes as they create a good dense hedge and 20% prunus spinosa is not uncommon. However, the Applicant will update the proposed species in LEMP Appendix C: Planting Schedules at Deadline 7 to reduce the proportion of <i>Prunus spinosa</i> .
N/A	Proposed sizes for trees	The sizes for proposed trees within the W1 Woodland Mix, W2 Woodland Edge, T1 Individual Tree Planting and H2 Species Rich Hedgerow Planting With Trees are inappropriate for the planting conditions of the project area. SCC cannot support these sizes, as root-balled trees of a height of 300-350cm are costly, inherently difficult to establish, and would require heightened levels of aftercare, in particular regular (twice weekly) watering, to give them a chance of survival. SCC (Landscape) recommends planting sizes no bigger than feathered whips, if/where a differentiation to smaller hedge planting is desired. Usually, smaller trees have a greater rate of success, with better growth rates than trees planted in larger sizes. Within a few years the smaller trees are likely to provide the same or better mitigation as/than trees larger at planting. Additionally, failure rates tend to be lower, and failures are less costly to replace (money that can be spend on aftercare).	The trees listed in Table 3.1 and Table 4.2 of LEMP Appendix C: Planting Schedules [APP-185] have been included to allow for a more immediate screening effect and to allow for a variety of available sizes during detailed design. The sizes are typical and not unusual to other similar planting schemes. The Applicant would be responsible for the establishment of any planting proposed in accordance with LEMP [REP3-034] . However, at the Councils' request, the Applicant will look to reduce the size of the trees proposed in LEMP Appendix C: Planting Schedules at Deadline 7.
N/A	Prototype LEMP	Prior to construction a detailed LEMP would be produced for each stage of the works including details of all proposed hard and soft landscaping works, such as:	No change is proposed to the LEMP. The Applicant does not consider a need to produce detailed LEMP at each stage and has responded to where the existing LEMP serves the purpose or where further control is unnecessary. Further discharge of the LEMP at each stage would put at risk the construction programme of the project.
N/A	Planting schedules	a. Finalised location, number, species, sizes and density of any proposed planting, including any trees	No change is proposed to the LEMP. The location, number, species sizes and density is already secured in the LEMP as per LEMP Appendix B: Reinstatement Plan [REP3-036] and LEMP Appendix C: Planting Schedules [APP-185] . Requirement 9 of the draft DCO (Document 3.1 (F)) also states that ' <i>Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may be brought into operational use until, for that stage, a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated during that stage has been submitted to and approved by the relevant planning authority.</i> '
N/A	Planting environment	b. cultivation, importing of materials, protection, and weed control to ensure plant establishment	The Applicant is unsure what is meant by cultivation in relation to the LEMP and considers that this matter may be covered in Chapter 11: Agriculture and Soils in the CEMP (Document 7.5 (C)). The Applicant assumes that importing of materials is related to the provenance of plants. This is covered in paragraph 8.2.2 of the LEMP [REP3-034] which states that ' <i>Trees and shrubs will be of local provenance (to reduce risks associated with disease when importing stock from overseas sources) and consideration will be given to resilience to climate change. They shall be</i>

Ref	Matter	Submission from Third Party	Applicant's Comments
			<p><i>supplied in accordance with BS 8545:2014 Trees: from nursery to independence in the landscape (British Standards Institution, 2014).'</i></p> <p>Protection is covered in Chapter 6 of the LEMP [REP3-034], which covers protection of vegetation to be retained on the project. Weed control is described in paragraph 9.2.1 of the LEMP [REP3-034] which states '<i>The five-year aftercare includes inspections by a suitably experienced professional for all reinstated woodland, hedgerows, tree belts and individual trees to apply herbicide to maintain weed-free plant circles around base of transplants and spot-treat undesirable species, having regard to any restrictions on use of herbicides in certain locations, for example, in proximity to watercourses or other sensitive habitats. Selective hand weeding may be required where there are no suitable alternative methods</i>'.</p>
N/A	Ground levels	c. proposed finished ground levels	No change is proposed to the LEMP, as paragraph 8.3.2 already says ' <i>Topsoil is pulled from the heap using excavator buckets and displaced gradually to the correct grade using either excavators or bulldozers as reinstatement progresses and topographic levels are checked regularly by Global Positioning System (GPS) survey equipment so that reinstatement reflect the existing profile before construction commenced, wherever practicable.</i> '
N/A	Hard landscape features	d. hard surfacing materials	No change is proposed to the LEMP, as hard surfacing is limited to the permanent access tracks to the GSP substation and the CSE compounds. These are functional features and the Applicant does not consider it to be necessary for this information to be provided to the Councils for approval. EM-G14 was added to the REAC at Deadline 5 (Document 7.5.2 (D)) in relation to the surfacing of the permanent access track at Stour Valley East CSE compound, and states ' <i>A landscape architect will be involved in the detailed design to advise on suitable finishes for the permanent access route at Stour Valley East CSE compound as part of reducing the landscape and visual effects of this feature.</i> '
N/A	Pedestrian access and parking	e. vehicular and pedestrian access, parking and circulation areas	No change is proposed to the LEMP, as the Applicant assumes that this is in relation to the CSE compounds and GSP substation which would be operational sites. These areas would be unmanned, therefore there is no parking required at the sites other than for an occasional operational vehicle for staff undertaking an inspection or maintenance check.
N/A	Minor structures	f. minor structures, such as furniture, refuse or other storage units, signs and lighting	<p>The Applicant is unclear about what minor structures, such as furniture, refuse or other storage units the Councils are referring to in relation to this project. No permanent signage is anticipated on the project other than at the permanent access points at the entrance to the GSP substation and the CSE compounds.</p> <p>The only permanent lighting would be the security lighting proposed at the GSP substation. This security lighting would be low lux level light-emitting diode type luminaires with directable light output and passive infrared sensor motion activated lighting at the access gates to facilitate safe entry at night. As the GSP substation has been granted planning consent under the TCPA, the Applicant does not see a need to provide further details in the LEMP.</p>
N/A	Services	g. proposed and existing functional services above and below, ground, including drainage, power and communications cables and pipelines, manholes and supports	No change is proposed to the LEMP. The Main Works Contractor will undertake a full service check as part of their risk assessments for construction of the project. The relocation of existing services has been considered as part of the vegetation assumptions shown on LEMP Appendix A: Retention and Removal Plan [APP-183] and LEMP Appendix B: Reinstatement Plan [REP3-036] .
N/A	Tree and hedge protection	h. details of existing trees and hedges to be retained with measures for their protection during the construction period	No change is proposed to the LEMP. LEMP Appendix A: Retention and Removal Plan [APP-183] shows the trees and hedges that would be retained on the project. Chapter 6 of the LEMP [REP3-034] sets out the measures to protect trees (Section 6.2 and 6.3) and hedgerows (Section 6.4).
N/A	Historic landscape features	i. retained historic landscape features such as ditches and banks and proposals for restoration, where relevant	No change is proposed to the LEMP, as this is already covered in both the LEMP [REP3-034] and the CoCP [REP3-026] . Paragraph 8.3.2 of the LEMP [REP3-034] states ' <i>Topsoil is pulled from the heap using excavator buckets and displaced gradually to the correct grade using either excavators or bulldozers as reinstatement progresses and topographic levels are checked regularly by Global Positioning System (GPS) survey equipment so that reinstatement reflect the existing profile before construction commenced, wherever practicable.</i> ' Whilst good practice measure H05 in the CoCP [REP3-026] states ' <i>A topographic survey will be undertaken in advance of construction of each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the lane, including banks and ditches. During construction, the contractor will seek to limit the working area to the narrowest section of the lane that is practicable for the specific works. Any historic features associated with the lane will be reinstated at the end of construction to the pre-work condition, including the replanting of hedgerows and reinstatement of historic earthworks.</i> '
N/A	Implementation timetable	j. implementation timetables for all landscaping works	No change is proposed to the LEMP as Requirement 10 of the draft DCO (Document 3.1 (F)) states that ' <i>all reinstatement planting works... must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use</i> '.

Ref	Matter	Submission from Third Party	Applicant's Comments
N/A	Soil measures	k. soil retention, handling and protection (including replacing woodland soils within the woodlands on completion)	No change is proposed to the LEMP, as this is already included in Chapter 11 of the CEMP (Document 7.5 (C)) which describes soil retention, handling and protection of soils and that soils would be replaced in situ.
N/A	Sustainable drainage	l. The provision of a scheme of sustainable drainage will be integrated into the scheme	No change is proposed to the LEMP, as this is already described in the CEMP (Document 7.5 (C)) which states in paragraph 9.3.7: <i>'In accordance with good practice measure AS05, land drains and ditch locations will be identified based on existing land drainage plans and/or site observations. Where required, land drainage will be installed (either temporary or permanent) to maintain the integrity of existing field drainage systems for the duration of works. Drainage systems however will not be installed into areas where they are not currently present, e.g. environmental wetlands. The actual condition and characteristics (e.g. depth of installation, pipe type and diameter) of the existing drainage will be recorded upon excavation. Landowners will be consulted during the pre-construction surveys to establish the existing underdrainage within those areas to be disturbed during construction.'</i>
N/A	Details at the CSE compounds	m. the details of hard and soft landscaping works at the CSE compounds	The soft landscaping at the CSE compounds is shown on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036]. The Applicant has also updated Requirement 9 of the draft DCO (Document 3.1 (F)) at Deadline 6 to state that: <i>'Unless otherwise agreed with the relevant planning authority, the reinstatement planting plan submitted under sub-paragraph (1) will include a landscape plan for the cable sealing end compound where relevant for the stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.'</i>
N/A	Details at the CSE compounds	n. Integration of CSE compound design principles.	The Applicant is unsure what is meant by this comment. The CSE compound would be designed to National Grid standards suitable to its purpose. However, the Applicant has also updated Requirement 9 of the draft DCO (Document 3.1 (F)) at Deadline 6 to state that: <i>'Unless otherwise agreed with the relevant planning authority, the reinstatement planting plan submitted under sub-paragraph (1) will include a landscape plan for the cable sealing end compound where relevant for the stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.'</i>
N/A	Veteran trees	o. A mitigation strategy, if required, for the loss of any veteran trees or trees with veteran characteristics and how it would be implemented.	There is only one veteran tree (T378) that is anticipated to be lost on the project. The Applicant has made a commitment (EM-G13) with regards to this tree, which is secured in the REAC (Document 7.5.2 (D)): <i>'EM-G13: Veteran tree T378 has a historic primary union failure at 3m which has internal hollowing within large cavities and deadwood present. It is likely that it will need to be felled due to its location within the cable swathe. Where the removal of the tree is necessary, the compensation will comprise soft felling of the tree (in accordance with the final bat licence where applicable). If the limbs are not rotten and have suitable veteran features, then these will be attached to a suitable retained tree(s) within the Order Limits as close as practicable to the lost tree. Where attaching the limbs is not suitable (e.g. if rotten or if these have no veteran features), then the wood will be retained on site as a log pile to retain a habitat function. In addition, another tree will be veteranized as compensation for the loss of T378. The tree to be veteranized will be identified by an arboriculturalist who will also advise on the method for veteranisation, with advice from an ecologist on how to achieve the most habitat value.'</i>
N/A	Planting over cables	p. Where trees cannot be planted over the cables, habitat continuity would be maintained through planting of shrub species	No change is proposed to the LEMP, as scrub planting (over cables) is already shown over the cable sections on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036].
N/A	Browsing	q. To aid establishment of replanted trees and shrubs, a scheme of protection would be developed to demonstrate how new tree and hedge planting would be protected against deer, rabbits/hares etc. (for example with stock-proof fencing and either rabbit-proof fencing or tree guards). The detail would also indicate a variety of access gates within the detail for badgers or other creatures that may have, for instance, established routes through the restored hedge.	<p>No change is proposed to the LEMP as it will be the Applicant's responsibility to protect new trees and hedge planting from browsing, otherwise the required habitat objectives would not be met.</p> <p>The Applicant is not intending to use stock or rabbit proof fencing to protect against deer at length, as this is impractical on a linear project of this nature and it would create a barrier for other species. Paragraph 8.2.2 of the LEMP [REP3-034] states that <i>'Tree and shrub planting areas will initially be protected to shield young trees from browsing rabbits and deer during establishment, for example using tree/shrub shelters or fencing. Protection, for example fencing will also be considered around planting'</i>. Paragraph 9.1.4 of the LEMP [REP3-034] also states that <i>'Checks will also be made to identify the success of protective measures to avoid browsing by deer and rabbits to see if additional management measures are required to encourage growth and development of the reinstatement planting... These checks will identify whether additional measures need to be undertaken so that vegetation re-establishes in these areas. This could include additional planting.'</i></p> <p>The Applicant will add additional wording to the LEMP at Deadline 7 to state that coppiced stools will be protected during operation by using vegetation cleared from the specific site during construction to create protective areas around the stools or dead hedges around group of stools to reduce the risk of animal browsing.</p>
N/A	Annual inspections	r. To ensure development to a satisfactory standard, there will be an agreed procedure for joint annual inspection of all planting areas by representatives of the relevant Local Planning Authority and developers towards the end of each growing season and for each year of the aftercare period, following implementation. Areas found not to be thriving should be treated to such	The Applicant does not consider there to be a requirement for joint annual inspections with the Local Planning Authorities however if considered beneficial to all parties this could be organised at the relevant time. The Applicant notes that it undertakes similar activities to that proposed on the project across its network and is used to implementing landscape contracts on its projects.

Ref	Matter	Submission from Third Party	Applicant's Comments
		additional works as are required to rectify the situation within the next growing season.	
N/A	Aftercare	s. Any tree or shrub planted as part of an approved landscaping management scheme that, within the agreed aftercare period, is removed, dies or becomes, in the opinion of the relevant Local Planning Authority, seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise agreed in writing by the relevant Local Planning Authority.	No change is proposed to the LEMP, as Requirement 10 of the draft DCO (Document 3.1 (F)) states that ' <i>Any trees or hedgerows planted as part of an approved reinstatement planting scheme that, within a period of 5 years after planting, are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority.</i> '
N/A	Aftercare	t. Suspension of the aftercare period for any part of the scheme may occur in the event that in the opinion of the relevant Local Planning Authority there was a significant failure of the planting scheme that could not be satisfactorily remedied in the following planting season, and or part of the planting scheme was failing to progress to the extent that it would not achieve the objectives of the scheme within the specified aftercare period.	The Applicant considers it to be standard process to commit to a five-year aftercare period on the planting undertaken as part of the project. In general, this consists of reinstatement of hedgerows and regrowth of coppiced vegetation, both of which are likely to be well established at the end of 5 years. The Applicant has committed to longer duration of aftercare for the embedded planting (for the life of the associated asset) (measures EM-D01, EM-F01, EM-G03, EM-G06, EM-H02 in the REAC (Document 7.5.2 (D))), and at the mitigation woodland planting area to the north of Hintlesham Woods, where a longer duration would be required to reach the required habitat objectives.
N/A	Hedgerow prescriptions –	For hedgerows, where there are no protected species issues (e.g., they are not used as important commuting/ foraging routes by bats, etc), the hedgerow does not qualify as an important hedgerow under the Hedgerow Regulations 1997, and removal of the hedgerow is not anticipated to have significant residual visual impacts, the following measures would be followed: a. The topsoil (including any bank) from beneath the hedgerow would be stripped and stored separately. b. Vegetation and topsoil from any associated ditch would be stripped and stored separately. c. Soil storage areas would be clearly signed and demarcated to prevent any mixing with other soils.	The Applicant will update the LEMP at Deadline 7 to include reference to the following hedgerow measures as requested by the Councils: a. The topsoil (including any bank) from beneath the hedgerow would be stripped and stored separately. b. Vegetation and topsoil from any associated ditch would be stripped and stored separately. c. Soil storage areas would be clearly signed and demarcated to prevent any mixing with other soils.
N/A	Hedgerow prescriptions –	Measures for Important Hedgerows under the Hedgerow Regulation 1997 to be included in the LEMP. The mitigation measures for botanically important hedgerows, or those qualifying as important under the Hedgerow Regulations 1997 would be the same as above with the exception that, where viable, the following measures would be considered, discussed, and agreed with the relevant Local Authority:	See detailed responses below.
N/A		a. The minimisation of the construction width, by coppicing the hedge plants and protection of the coppice stools, with a temporary roadway, wherever practicable and appropriate	No changes are proposed as the LEMP Appendix A: Vegetation Retention and Removal Plans [APP-183] already show the minimum widths required to safely construct the project. The Applicant has sought to minimise the width of hedgerow crossings and the intervention, the required widths and method are explained further in ES Chapter 4: Project Description [APP-072].
N/A		b. The coppicing and removal to hedge plants, (shrubs) along the cable route to a location where they can be maintained and subsequently replaced into the boundary. Vegetation would first be strimmed to ground level.	No change is proposed as the LEMP already includes these details, as shown on the plans in LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183] which shows that hedgerows within the cable swathe would need to be removed (including roots) to install the cables and then would be reinstated as shown on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036]. It would not be practicable, as it would significantly affect the programme and cost of the project, to coppice and remove each hedgerow species prior to installing the underground cables. These would then need to be stored for up to four years until after testing of the transmission line, when replanting could be undertaken. Coppicing would be used as a measure within some parts of the overhead line areas, as shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183].
N/A		c. Where possible, geotextile would be used for the running track to reduce the amount of topsoil being stripped (this would aid reinstatement of vegetation).	No change proposed in the LEMP, this would not protect soil structure. It is important to protect the soil as well as the seedbank within the topsoil. The contractor would choose the lowest form of intervention suitable. Stone access routes are expensive and take time to install and reinstate and would not be used if there wasn't a project need based on the vehicle types and need to protect the soil structure. Trackway is proposed in locations which do not require heavy construction vehicles. Stone access routes would be required in the cable sections due to the delivery of the cable drums. Stone access routes would also be required in the overhead line sections where a crane and/or piling rig is required to construct the pylons.

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N/A	Post construction	d. Banks and ditches would be reformed to similar profiles as before.	No change is proposed, as paragraph 8.7.1 of the LEMP [REP3-034] already states that ' <i>Watercourses will be reinstated to at least the same condition as prior to construction. This includes reinstatement of the bank profile, bed levels and gradients.</i> '
N/A	Topsoil replacement	e. Topsoil would be replaced after works in the reverse order that it was excavated to distinguish its difference from other stored topsoil	No change is proposed to the LEMP as paragraph 11.3.36 of the CEMP (Document 7.5 (C)) states that ' <i>Soil reinstatement is the reverse of soil stripping with topsoil being replaced over subsoil. Soil horizons will be replaced to the correct thickness.</i> '
N/A	Planting season	f. Replanting of hedgerows would take place in the first available planting season following construction and would aim to enhance baseline conditions i.e., through improved species diversity or replanting on a two for one basis (two planted foreach plant removed), where compliant with landscape objectives.	No change is proposed to the LEMP as Requirement 10 of the draft DCO (Document 3.1 (F)) states that ' <i>all reinstatement planting works... must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use</i> '. Defra Metric 3.1 has been used to demonstrate reinstatement of the baseline conditions and the Environmental Gain Report [APP-176] sets out the enhancements proposed to deliver the 10% net gain. This is instead of a ratio approach.
N/A	Planting mixes	g. Planting would use shrubs of the same species and in the same general proportions as existed pre-construction (native, preferably of local origin). The replanting mix and pattern would be established on the basis of a survey in accordance with the Hedgerow Regulations, 1997	No change is proposed to the LEMP as paragraph 8.2.3 of the LEMP [REP3-034] already states that ' <i>The proposed species mixes and typical stock sizes for the main planting reinstatement types are set out in the table in Appendix C and are cross-referenced on the Vegetation Reinstatement Plan in Appendix B. These generally reflect existing species compositions and habitat types identified within the ecological and arboricultural surveys, where these were considered appropriate.</i> ' Paragraph 8.2.2 of the LEMP also states that ' <i>Trees and shrubs will be of local provenance (to reduce risks associated with disease when importing stock from overseas sources) and consideration will be given to resilience to climate change.</i> ' A Hedgerow Regulations 1997 assessment has been undertaken for hedgerows in the Order Limits and can be found in ES Appendix 7.5: Important Hedgerows Assessment [APP-115] .
N/A	Species composition	h. A schedule of species composition for reinstatement would be provided	No change is proposed to the LEMP, as LEMP Appendix C: Planting Schedules [APP-185] already provides this. Requirement 9 of the draft DCO (Document 3.1 (F)) also states ' <i>The reinstatement planting plan submitted under sub-paragraph (1) must include 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.</i> '
N/A	Detailed scheme of hedge planting	i. A detailed scheme of hedge planting aftercare will be provided, to be agreed with the relevant local authorities. This will include details of soil restoration and ground preparation, species choice, stock size, spacing and a program of weed control and aftercare to cover a period of five years.	No change is proposed to the LEMP as these details are already provided in the LEMP (or CEMP) as follows: <ul style="list-style-type: none">• Soil restoration and ground preparation is contained in Chapter 11 of the CEMP (Document 7.5 (C));• Species choice, stock size and spacing can be found in LEMP Appendix C: Planting Schedules [APP-185];• Weed control is described in Section 9.2 of the LEMP [REP3-034]; and• The aftercare is 5 years (unless stated otherwise) as per Requirement 10 of the draft DCO (Document 3.1 (F)).
Landscape and Ecological Management Plan Document Review [REP5-035]			
N/A	General	Changing nature of document from LEMP to Outline LEMP. The document contains multiple references to the document being an Outline LEMP (oLEMP) and for the need for a 'Final' LEMP.	The Applicant does not consider a need to change the document to an Outline LEMP as it considers all relevant aspects are included within the LEMP [REP3-034] and has responded to specific matters below.
1.1.2	Refinements	Proposed deletion of ' <i>It is recognised that there may be minor refinements through examination process as part of the application for development consent</i> '.	The text will be deleted from the LEMP at Deadline 7 to reflect the Councils' proposed text.
1.2.8	Aftercare period	Proposed deletion of text as follows 'National Grid, UKPN and any appointed contractors will carry out all work in accordance with the OLEMP during the construction, reinstatement and five-year aftercare period of the project unless a longer period has been defined through the project commitments (see paragraph 9.1.2 of the LEMP) or if otherwise agreed with the relevant planning authority'	No change is proposed to the LEMP, as this aligns with the wording of Requirement 10 of the draft DCO (Document 3.1 (F)) which states that ' <i>Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of 5 years after planting, are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority.</i> '
1.3.1	Purpose of the LEMP	The purpose of the LEMP is to set out outline how landscape and ecological features such as landform, watercourses, vegetation (including trees) and habitats will be protected and managed during construction. It also sets out and how land, vegetation and habitats will be reinstated following construction, together with the subsequent aftercare and, where applicable, monitoring arrangements, <i>reflecting the results and recommendations of relevant surveys and impact assessments.</i>	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
New	Purpose of the LEMP	The contractor will be responsible for implementing the measures outlined within the LEMP and associated management plans. The final detail of the mitigation	The Applicant does not consider a need to change the document to an Outline LEMP as it considers all relevant aspects are included within the LEMP [REP3-034] and has responded to specific matters below.

Ref	Matter	Submission from Third Party	Applicant's Comments
		<i>and enhancement measures will be provided through the Landscape and Ecological Management Plan(s) (LEMPs), to be agreed with the relevant authorities, pursuant to Requirements XX and XX of the draft DCO.</i>	
1.3.2	Objectives of the LEMP	The objectives of the <i>OLEMP</i> , as the basis for these more detailed future plans, are to	The Applicant does not consider a need to change the document to an Outline LEMP as it considers all relevant aspects are included within the LEMP [REP3-034] and has responded to specific matters below.
1.3.2	Objectives of the LEMP	Provide a mechanism for the delivery of landscape and ecological measures (other than those which will be secured through specific requirements of the DCO), to avoid, <i>minimise and</i> compensate for environmental effects identified in the Environmental Statement (ES);	No change is proposed to the LEMP, as the Applicant has used the word 'reduce' throughout the application documents including the ES and the management plans and therefore proposes to stick with this term in terms of consistency across the documents.
1.3.2	Objectives of the LEMP	<i>To clearly outline the framework for ecological management and agree timetables for submission, after consultation with the relevant planning authority;</i>	The Applicant does not consider the need for this bullet as the implementation timetable is defined in Requirement 10 of the draft DCO (Document 3.1 (F)) which states that ' <i>Unless otherwise agreed with the relevant planning authority, all reinstatement planting works referred to in Requirement 9 must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use</i> '.
1.3.2	Objectives of the LEMP	<i>To outline the provision of the details that would form both species protection and landscape mitigation and compensation planting schemes;</i>	The text will be amended in the LEMP at Deadline 7 to state 'To outline the provision of the details that would form both species protection and landscape mitigation (including compensation for habitats lost) planting schemes.'
1.3.2	Objectives of the LEMP	<i>To provide the basis for the agreement of a detailed Landscape Scheme for the CSE compound and substation sites with an aftercare for the duration of the operational phase.</i>	<p>The LEMP already sets out the landscape planting proposed at the CSE compounds and the GSP substation site, as shown on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036]. The Applicant has also updated Requirement 9 of the draft DCO (Document 3.1 (F)) at Deadline 6 to state that: '<i>Unless otherwise agreed with the relevant planning authority, the reinstatement planting plan submitted under sub-paragraph (1) will include a landscape plan for the cable sealing end compound where relevant for the stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.</i>'</p> <p>The Applicant does not consider this necessary at the GSP substation, where BDC has been provided with a landscape plan for the planning application (planning application reference 22/01147/FUL) consented under the TCPA. There is no planting proposed within the Bramford Substation boundary.</p>
1.3.2	Objectives of the LEMP	<i>One for one replacement planting of failed plants would only be required for the first 5 years. Replacement planting after this date may be requested at the discretion of the relevant Local authority.</i>	The Applicant does not see the need for this specific bullet to be included in the purpose of the LEMP as Requirement 10 of the draft DCO (Document 3.1 (F)) states: ' <i>Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of 5 years after planting, are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority.</i> '
1.3.2	Objectives of the LEMP	<i>This scheme will detail how ecological landscape and Sustainable Drainage System (SuDS) requirements will be integrated at the CSE compound and substation sites. For this, a SuDS drainage strategy will be developed in accordance with DCO Requirement XX relating to a Surface Water and Drainage Management Plan, taking into account provisions of the Outline Landscape and Ecological Management Plan;</i>	<p>The Applicant does not see the need for this specific bullet to be included in the purpose of the LEMP because paragraph 4.9.24 of ES Chapter 4: Project Description [APP-072] states that the CSE compounds would have porous surfacing (such as soakaways or French drains) to allow surface water to naturally infiltrate to greenfield rates without the need for formal drainage.</p> <p>The GSP substation (which has been consented under a separate TCPA planning application (planning application reference 22/01147/FUL)) would include permanent surface and foul drainage systems. The drainage design would be in accordance with the requirements of the Essex County Council SuDS Design Guide (2020) and would include allowances for climate change in accordance with current Environment Agency requirements (good practice measure W12 in the CoCP [REP3-026]). All remaining areas are likely to contain porous surfacing to allow surface water to naturally infiltrate without the need for formal drainage.</p> <p>Requirement 5 of the draft DCO (Document 3.1 (F)) states that no stage of the authorised development may be brought into operational use until, for that stage, a Drainage Management Plan, to address operational surface water management matters, has been submitted to and approved by the relevant highway authority.</p>
1.3.2	Objectives of the LEMP	<i>To provide the basis for the agreement of a detailed Landscaping Management Plan for the protection and restoration of trees and hedges in the cable corridor, with an aftercare period of five years for hedges and ten years for trees;</i>	As noted above, the Applicant does not consider there is a need for a detailed landscape management plan. The Applicant has committed to five years of aftercare, as per Requirement 10 in the draft DCO (Document 3.1 (F)). The Applicant has also identified specific areas where a longer duration aftercare period would be undertaken (see paragraph 9.1.2 of the LEMP [REP3-034]).
1.3.2	Objectives of the LEMP	<i>It is expected that the schemes of planting and aftercare for the both the cable corridor and CSE compound and substation sites would be delivered by contractors who can demonstrate appropriate experience and capacity to deliver effective and robust aftercare and provide a consistent quality of work across the</i>	The Applicant uses competent framework contractors to deliver its projects. These contractors have to submit tenders at both the framework level and project level to show how they are qualified to deliver National Grid projects. As this is a commercial process between National Grid and its contractor, the Applicant does not consider it appropriate to involve the Councils in the tendering process.

Ref	Matter	Submission from Third Party	Applicant's Comments
		<i>whole project. The relevant Local Authorities would seek to work collaboratively with National Grid to develop planting specifications for tendering for this work;</i>	
1.3.2	Objectives of the LEMP	<i>To provide a single document for all ecological mitigation considerations on site e.g. a single reference for the Ecological Clerk of Works (ECoW);</i>	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text for the objectives of the LEMP. However, the Applicant notes that the terminology used across all the management plans is for an Environmental Clerk of Works (EnvCoW) who would be supported by various specialists including ecologists.
1.3.2	Objectives of the LEMP	<i>To ensure all reasonable precautions are taken by National Grid and their contractors to safeguard protected species. This Strategy also acts as the basis for a Species Protection Plan. A final detailed scheme of protection and mitigation measures for any European protected species (EPS) shown to be present, prior to construction, will be agreed with the relevant authorities under Requirement 33 of the draft DCO.</i>	The Applicant does not see the need for this specific bullet to be included in the purpose of the LEMP as this is in relation to compliance with legislation and the licences agreed with Natural England. Section 7.4 of the LEMP [REP3-034] sets out the measures in relation to protected species.
1.3.2	Objectives of the LEMP	<i>The LEMPs will also form the basis of a process of ongoing dialogue/forum with Local Authorities leading up to and during construction to ensure that Local Authorities are kept informed and satisfied of the implementation of the Outline Landscape and Ecological Management Plan (and the plans/schemes of which it forms the basis) and in order that they can also keep communities informed.</i>	The Applicant is committed to continuing engagement with the Councils which will be in the form of the regular Host Authority meetings currently held on the project. The Applicant would also be undertaking communications with local residents as described in Section 3.4 of the CEMP (Document 7.5 (C)).
1.3.2	Objectives of the LEMP	Provide details of the vegetation which will be provided as part of the embedded measures, reinstatement or additional mitigation proposals	The Applicant is unclear why the Councils are suggesting deleting this sentence, as the Applicant considered this a key function of the LEMP [REP3-034] .
1.3.2	Objectives of the LEMP	<i>An Ecological Clerk of Works (ECoW) and/or Arboricultural Clerk of Works (ACoW) will be present on site during construction.</i>	It would be completely disproportionate to the nature of the effects (and not economic and efficient) to have an ECoW and ACoW on site for the duration of construction. Especially given that the works lie typically within arable fields with limited ecological or arboricultural value. The LEMP [REP3-034] already includes many references to where an ecologist and / or arboriculturalist would advise the EnvCoW on relevant matters. However, the Applicant will add clarity about the roles into the LEMP at Deadline 7 to make clear that specialists would be available to advise on landscape and ecological matters as required.
1.3.2	Objectives of the LEMP	<i>If protected species or trees and hedges specified to be retained, are unexpectedly found or damaged during construction, the following action will take place:</i> <ul style="list-style-type: none"> • Works will cease immediately; • The ECoW and or ACoW and Construction Manager will be informed; • The relevant area would be demarcated and access will be restricted if necessary; • A way forward will be established and agreed and if necessary licences and authorisations will be sought; and • Works will restart once the EcoW and or ACoW, Natural England and the relevant planning authority are satisfied with the works proposed. 	The Applicant uses competent framework contractors to deliver its project, who understand what is required to comply with environmental legislation. However, the Applicant will add reference to Section 7.4 of the LEMP at Deadline 7 to explain that advice would be sought from an ecologist if protected species are found on site during construction and that this could involve seeking necessary licences if pertaining to protected species.
1.3.2	Objectives of the LEMP	<i>National Grid will work with the relevant local authority to ensure appropriate resourcing is in place to monitor compliance with the provisions of the Outline Landscape and Ecological Management Plan, and the plans and schemes of which it forms the basis.</i>	The Applicant considers that it is its role, alongside its Main Works Contractor, to deliver the project in compliance with the management plans otherwise it would be in breach of its DCO. Paragraph 10.2.2 of the LEMP [REP3-034] states that ' <i>Regular site checks will be carried out to monitor compliance with the LEMP.</i> ' In addition, the Applicant will update the LEMP at Deadline 7 with the equivalent text from Section 15.3 of the CEMP (Document 7.5 (C)) which sets out the process for dealing with non-compliance of the management plans. This notes that where there is non-compliance, that it would be reported and investigated and the appropriate enforcing authority will be contacted and informed.
1.3.3	Environmental commitments	The project as submitted with the application for development consent include environmental commitments under the following categories... <ul style="list-style-type: none"> • <i>Compensation??</i> 	Compensation for habitats lost during construction is included under the header of mitigation. Therefore, the Applicant does not consider there to be a need to add an additional bullet for compensation.
1.4	Environmental gain	Comment: 'BNG and ENG conflated'	The Applicant is unsure what the Councils mean in relation to this comment or what they would like addressed in the LEMP.

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1.5	Table 1.1 (Landscape and Ecological Reinstatement)	Comment: 'References reinstatement works only, not mitigation and compensation. Expand Chapter 8 to include mitigation and compensation.'	This is an error. The title of the chapter was updated at Deadline 3 [REP3-034] but was not carried through to Table 1.1. This will be amended in the LEMP at Deadline 7.
1.5	Table 1.1 (Landscape and Ecological Reinstatement)	Comment: 'Expand Chapter 9 to include long-term management.'	The Applicant does not consider the change to the title necessary, as long term management would only apply in certain areas and the heading of 'aftercare' is generic.
1.5	Table 1.1 (Appendix B)	Comment: 'Need separate reinstatement plan, mitigation plan and compensation plan'. Comment: 'Clarify through colour coding on one plan'.	<p>The Applicant disagrees with disaggregating LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] into separate plans for the planting plans for reinstatement, mitigation and compensation. This seems to contradict the comment above and below to have all ecological mitigation considerations in one place.</p> <p>The different types of planting are shown on Figure 16.1 in ES Figures [APP-155] for clarity for the assessment. The Applicant does not consider there to be a need to add further colour coding to LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036], the purpose of which is to inform the contractor about what planting is required where. Differentiation between the types of planting is considered unnecessary for this purpose.</p>
2.1	Environmental considerations	As explained in Chapter 1, the project incorporates environmental considerations through measures embedded in the design, good practice (general measures and topic-specific) measures and mitigation measures identified in the ES (application document 6.2). For ease of reference these have been assigned a reference number: • <i>Compensation measures?</i>	Figure 16.1 in ES Figures [APP-155] explains the planting that is required for biodiversity compensation. This has been considered as part of the overall mitigation identified on the project. Introducing a different term in the management plans would not align with the ES and would be confusing to readers linking the two together.
2.5	Table 2.1 (UK Habitat Classification Survey)	Minor correction UK Habitats Classification Survey.	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
2.5.6	Pre-construction surveys	Addition: The pre-construction survey information will inform the updated versions of Appendices A and B of the <i>final</i> LEMP which will be provided to the relevant planning authorities in accordance with Requirement 8 of the draft DCO (application document 3.1) which states:	As noted above, the Applicant does not consider there to be a need for a later discharge version of the LEMP.
2.5.6	Pre-construction surveys	Comment: 'this caveat weakens the requirement' (1) 'Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a plan showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage has been submitted to and approved by the relevant planning authority	No change is proposed to the LEMP, as this is the wording from the Requirement 8 of the draft DCO (Document 3.1 (F)), which is based on standard wording used in DCO drafting.
3.2	Table 3.1	Addition: These will have the relevant experience to supervise the relevant aspects of the works (<i>suitably qualified persons</i>), which might include an arboriculturist, land contamination specialist, soil specialist, ecologist, archaeologist <i>and landscape architect</i> .	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
4.3	Table 4.1	RNRs	No change is proposed to the LEMP, as the general language style used throughout the application documents is to not pluralise acronyms.
5.1.2	Statutory landscape designations	Amendment: The statutory landscape designations relevant to the LEMP and located within or close to the Order Limits are as follows: • Dedham Vale AONB National Landscape	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
5.1.2	Special Landscape Areas (SLA)	Comments: "Not in new Babergh Mid Suffolk Plan? 'BMSDC adopted Joint Local Plan (Section 1) supersedes policies of the individual Local Plans'.	The Applicant notes that the new local plan was adopted on 20 November 2023, however for consistency and as the ES was based on the old plan as that was current at time of writing, the references to SLA are retained within the LEMP [REP3-034] although a note will be added to the LEMP at Deadline 7 to state that these are no longer designated.

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5.2 and after 5.2.2	Landscape character areas	Comment: "Needs summary of main landscape character areas crossed" <i>The landscape character area that the project crosses are...</i>	The LEMP will be amended at Deadline 7 to include a list of the LCA crossed by the Order Limits and will also include a cross reference to ES Appendix 6.3: Assessment of Effects on Landscape Character [APP-100] where these are described in more detail.
6.1.3	General approach	In accordance with good practice measure GG24, where working areas will be <i>are fenced, with Heras-type fencing, unless otherwise agreed with the relevant local authority. the type of fencing installed will take into consideration the level of security required in relation to the surrounding land and public access, rural or urban environment and arable or stock farming.</i> For some locations the fence used may also <i>need</i> to serve to provide acoustic and visual screening of the work sites and reduce the potential for disturbance of users in the surrounding areas. Fencing will be regularly inspected and maintained and removed as part of the demobilisation unless otherwise agreed with the relevant landowner and <i>relevant local authority</i> to meet ecological objectives. The EnvCoW <i>ECoW</i> and arboriculturalist will contribute to discussions on appropriate signage and/or fencing to protect environmentally sensitive features, <i>which will be agreed with the relevant local authority.</i>	<p>The Applicant does not consider it to be appropriate to fence the entire Order Limits with Heras fencing. GG24 in the CoCP [REP3-026] is worded so that the measure is dependent on the risk. The Applicant also does not consider there to be any need to involve the Councils in how it chooses to secure its working area. The Applicant delivers high voltage electricity line projects all across the county, many of these are undertaken using permitted development rights and is used to securing the boundary of its sites.</p> <p>The Applicant changed the reference from ECoW to EnvCoW at the Councils request on the draft LEMP and is not proposing to change it back again. However, the Applicant will add further clarification to the LEMP at Deadline 7 regarding roles and the need to draw on suitably qualified specialists during construction.</p>
6.2.1	Working near trees - land access	Comment: 'Where (geographically) and how big (numbers of trees, lengths of tree lines, areas of woodlands) are the gaps in the surveys?'	<p>The vegetation affected is clearly shown on the plans in LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183]. The Applicant does not see any need to provide further details on where these are located and areas, when it is shown visually on the plans.</p> <p>This reference to gaps in surveys was in relation to the lack of arboricultural survey along the temporary access off the A131, which has since been completed in August 2023 and submitted into Examination at Deadline 1 (see Arboricultural Impact Assessment (AIA) [REP1-012]). Therefore, the line will be updated in the LEMP at Deadline 7 to remove reference to '<i>where land access was granted</i>'.</p>
After 6.2.1	Working near trees	<i>A pre-construction walkover survey will be undertaken by the Arboriculturist, Ecological Clerk of Works (ECoW) and an engineer to assist in micrositing the works to minimise tree loss.</i>	Pre-construction surveys are noted in paragraph 2.5.4 of the LEMP [REP3-034] . However, the LEMP will be updated at Deadline 7 to include reference to a pre-construction walkover of key areas between the EnVCoW, arboriculturalist, ecologist and engineer to assist in micrositing the construction works to minimise tree loss and avoid any other sensitive features.
After 6.2.1	Working near trees	<i>Any additional veteran trees present within the Development Area would be identified during this survey as well as any tree with bat roost potential. The surveys and assessments would be undertaken pre-construction to provide the works contractor with detailed baseline construction information.</i>	<p>The Applicant has already undertaken an arboricultural survey and impact assessment which has mapped the veteran trees within and adjacent to the Order Limits [REP1-011]. The proposed measures are included with the LEMP (see Section 6.3), which will be updated at Deadline 7 to include the new commitment made at Deadline 5 regarding veteran tree T378 (EM-G13 in the REAC (Document 7.5.2 (D))).</p> <p>Trees with bat roost potential are identified in ES Appendix 7.7: Bat Survey Report [APP-117]. A draft bat licence has been included in ES Appendix 7.7 Annex A: Bat Draft Licence [APP-118]. Natural England has provided a Letter of No Impediment (with caveats). A final draft licence will be submitted to Natural England should development consent be granted. As stated in paragraph 1.3.7 of the LEMP [REP3-034], the LEMP does not duplicate the measures set out within the relevant EPS Licences.</p> <p>Paragraph 2.5.4 of the LEMP [REP3-034] notes that the pre-construction surveys will check that the habitats on site are the same as in 2021/22. Paragraph 2.5.5 states that '<i>National Grid does not anticipate that information gathered during the preconstruction surveys would affect the commitments and methods of implementation set out within the LEMP. However, if the surveys identify new or different features, then these would be reviewed in accordance with the change process set out in Section 10.5.</i>'</p>
After 6.2.1	Working near trees	<i>The surveys would show actual position of trees and hedges, their condition and value and indicate the extent of root protection zones.</i>	<p>The location of trees and hedgerow are shown on the plans in LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183]. Their condition, value and extent of the root protection areas are recorded in the baseline documents that will be provided to the contractor namely the:</p> <ul style="list-style-type: none">• AIA [REP1-012].• ES Appendix 7.5: Important Hedgerows Assessment [APP-115]. <p>The Applicant does not see any need to provide further details on where these are located and areas, when it is shown visually on the plans and described in the supporting documentation.</p>
After 6.2.1	Working near trees	<i>All features of bat roost potential in accordance with 4th Ed Bat survey Guidelines (Collins ed 2023). This survey can be conducted at any time of year.</i>	No change is proposed to the LEMP, as this is part of a separate statutory process, as noted in paragraph 1.3.7 of the LEMP [REP3-034] which states ' <i>The LEMP does not duplicate the measures set out within the relevant EPS Licences or actions required to comply with any permits or licences applied for on the project.</i> ' A draft bat licence has been included in ES Appendix 7.7 Annex A: Bat Draft Licence [APP-118] . Natural England has provided a Letter of No Impediment (with caveats). A final draft

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			licence will be submitted to Natural England should development consent be granted. This would be undertaken in accordance with the latest guidance (currently 4 th Edition Bat Survey Guidelines (Collins, 2023)).
After 6.2.1	Working near trees	<p><i>The Arboriculturist would define specific mitigation measures to reduce the number of trees to be removed and to protect trees situated in or adjacent to the working width. The Arboriculturist will produce:</i></p> <ul style="list-style-type: none"><i>Drawings showing typical trench sections and some of the situations where micro-siting of the trenches and running track can avoid trees including canopy and roots.</i><i>Arboricultural Implications Assessments (AIA).</i><i>Arboricultural Method Statements (AMS) Tree Protection Plans (TPP).</i><i>Mitigation Strategy, if required, for any loss of veteran trees or trees with veteran characteristics in consultation with the ecologist and landscape architect.</i> <p><i>These will be produced for the working corridor to meet the British Standard (BS) 5837:2012 or its updates. These will be issued to, and agreed with the relevant local authorities.</i></p>	<p>Good practice measure LV02 in the CoCP [REP3-026] commits the Applicant to complying with BS 5837:2012 and this is also reiterated in the LEMP, for example at paragraph 6.2.3. The AIA has already been submitted into Examination [REP1-012]. The Applicant does not consider there to be a need to submit drawings on trench sections, AMS or TPP on this Nationally Significant Infrastructure Project (NSIP), as the Applicant regularly undertakes similar activities on other construction projects.</p> <p>The mitigation for the veteran tree (T378) is included in EM-G13 in the REAC (Document 7.5.2 (D)) (secured through Requirement 4 of the draft DCO (Document 3.1 (F)) and has been agreed through discussions with BMSDC.</p>
After 6.2.1	Working near trees	<p><i>The method statements (AMS) will detail the tree and hedge protection required at the CSE compounds and substations and at each hedge crossing along the works corridor, such as fencing or ground protection. This information will assist the contractor with the Arboriculturist to micro-site the trenches and manage the storage of materials and movement of vehicles to provide optimum embedded mitigation against tree and hedge loss or damage.</i></p>	<p>Good practice measure LV02 in the CoCP [REP3-026] commits the Applicant to complying with BS 5837:2012 and this is also reiterated in the LEMP [REP3-034], for example at paragraph 6.2.3. This requires AMS to be produced, which will be approved by the arboriculturalist.</p>
6.2.2	Working near trees	<p>Comments: ‘Compaction levels may increase through more frequent and heavier constriction traffic. “Agreed. All proposed access routes should be protected whether already compacted or not.</p> <p>Trees that are alongside existing tracks, hard surfaces or heavily compacted ground (such as unmetalled internal agricultural tracks) are considered to have adapted to the presence of that rooting constraint.</p>	<p>This paragraph was originally added to the LEMP to note that in some situations the tree roots may already have been affected such as along roads. However, the Applicant will add clarification to the LEMP at Deadline 7 to say that an arboriculturalist would advise on suitable measures based on the environment and the size and numbers of construction vehicles proposed along the route.</p>
6.2.3	Working near trees	<p>Works to trees and the agreement of relevant protection measures will be undertaken under the supervision of an aArboriculturist and/or the EnvCoW.</p>	<p>No change is proposed to the LEMP, as the Applicant has not been capitalising the specialist roles in any of the management plans. The Applicant maintains that not all tree protection measures need to be undertaken under the supervision of an arboriculturalist. However, an arboriculturalist would advise on what is required during the pre-construction surveys and the EnvCoW would be responsible for monitoring the implementation of the LEMP measures.</p>
6.2.4	Land drains	<p><i>The location of pre- and post-construction land drains would also be adjusted to avoid or minimise damage to tree roots.</i></p>	<p>This change has been accepted but the text has been added to the CEMP at Deadline 6 (Document 7.5 (C)) which sets out the details on land drainage – see paragraph 9.3.7 of the CEMP (Document 7.5 (C)) where the text now reads ‘<i>land drains will be adjusted to avoid or minimise damage to tree roots, where practicable</i>’.</p>
6.2.5	BS 5387	<p>6.2.5 — The type of barriers will be provided dependent on the level of risk posed to the RPA and to suit the location in accordance with clause 6.2.2.3 of BS 5387:2012, as agreed with the arboriculturalist on site. For example, this may be post and rope, or netlon-type fencing in low risk areas, plastic style pedestrian barriers in medium risk areas or, in high risk areas, welded mesh panels on rubber feet with stabiliser struts, commonly known as Heras-type fencing.</p>	<p>The Applicant disagrees with the removal of this paragraph as this is based on BS 5387:2012.</p>
6.2.7	BS 5387	<p><i>Unless otherwise agreed with the relevant local authority, Tree Protection Fencing types will include:</i></p> <ul style="list-style-type: none">Level 1 Protection: This will be used in areas with a low risk to trees, for example marking the RPA of trees lying outside of the working area. This may include orange netting on steel pins (or similar) to mark out the extent of the RPA for trees beyond the working area.	<p>The Applicant disagrees with the removal of this paragraph as this is based on BS 5387:2012. Heras-style fencing is unsuitable on long linear electrical infrastructure projects such as the Bramford to Twinstead Reinforcement. The fencing is costly, time consuming to install and is over designed for the risk that would occur in many locations across the project. BS 5387:2012 does not say that Heras-style fencing has to be used to mitigate the risk.</p>

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		<p>• Level 2 Protection: This will be used to reduce the risk of construction encroachment for example trees at the edge of the working area. This may include rigid pedestrian barriers.</p> <p>• Level 3 Protection: This will be used to protect important trees within areas of high construction activity. It could include measures such as braced consist of Heras-type panels with signage or solid hoarding in areas where it provides a combined function of protecting trees and providing security and screening.</p>	
6.2.8	BS 5387	It is assumed that physical barriers will not be provided where retained vegetation is in a location where there is a very low risk of accidental damage being caused, for example at the top of a steep cutting where the cutting itself provides protection.	The Applicant disagrees with the removal of this paragraph as this is based on BS 5387:2012.
6.2.9	BS 5387	As well as delineating the site, the working area fencing (where required) will serve to protect the trees that lie outside of the working area.	No change is proposed to the LEMP as the ' <i>where required</i> ' is included to cover locations where the Order Limits may not be fenced, and the level of risk does not dictate its need. For example in between pylons where the conductors are to be pulled but otherwise there would be limited construction activities.
6.2.10	BS 5387	In accordance with good practice and to avoid ground compaction, as referenced in clause 8.4 of BS 5387:2012, no materials (including fencing material prior to installation), plant or equipment will be stored in an RPA at any time. This will be briefed to the construction workforce working in or adjacent to an RPA , and be monitored by, the EnvCoW-Arboriculturist . In addition, construction vehicles and construction plant will not be allowed to idle or be parked in access the RPA. Where exclusion is not practical access is required in either of these instances, discussion with the recommendations of the arboriculturalist Arboriculturist.	The Applicant will update this paragraph in the LEMP at Deadline 7 to reflect the Councils' proposed text, other than to note that the EnvCoW would typically be the person briefing and monitoring implementation of the LEMP on site.
6.2.12	Deadwood habitat	In addition, and in accordance with good practice measure B08, decaying and dead wood within the Order Limits will be retained and protected during construction, subject to landowner agreement , to provide an important habitat for terrestrial invertebrates.	No change is proposed to the LEMP. The Applicant considers that this should be with landowner agreement, for example where this would not conflict with the operation of the land. The Applicant considers such measures as providing an optional benefit in relation to the project and should not be enforced on landowners without their agreement.
6.2.13	Root protection areas	It will not always be practical to keep construction vehicles outside of the RPA in all instances. In some cases, temporary construction access may be required within some RPA, as identified in clause 6.2.3.1 of BS 5387:2012.	No change is proposed to the LEMP. The Applicant considers that the first sentence is linked to the following one.
6.2.23	Tree works	Where branches overhang the working area and / or access routes, these may require trimming back or pruning to avoid further damage for example from passing construction vehicles. All tree works will be carried out by a specialist arboricultural contractor to avoid damage to the health of the tree <i>under the supervision of the Arboriculturist</i> .	The Applicant will update the LEMP at Deadline 7 in response to the Councils comments to add ' <i>under the advice of the arboriculturalist</i> '. The Applicant maintains that not all tree works require supervision by an arboriculturalist, as this would be costly and could delay the programme. However, an arboriculturalist would advise on what is required during the pre-construction surveys.
Following 6.2.23	Working in woodland	<p><i>Tree Works near and within Woodlands</i></p> <p><i>During construction</i></p> <p><i>The working width will be reduced to XXm within woodlands by storing soils from the woodland areas within the working width of adjacent sections of lower value habitat (on the same landownership).</i></p> <p><i>Soil excavated from within the woodland areas will be stored separately to that removed from either side of the woodland. This will protect any seeds which may be present within the ancient woodland soil. Soil will be stored in a fenced-off area; highlighting its different origin to soil excavated outside of the woodland and preventing mixing of the two.</i></p> <p><i>Where this would unacceptably restrict the working width or cannot be achieved due to adjacent hedgerows, the maximum area possible will be fenced and measures taken to mitigate the impacts of working beneath the canopy of the trees such as bog matting and sand padding to spread the weight of machinery passing over the root area would be used where practicable.</i></p>	In refining the Order Limits, the Applicant has already sought to limit the working width as much as it can at woodlands, as explained in ES Chapter 4: Project Description [APP-072]. There is very limited soil stripping required in woodland, as shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183], and in many cases the trees would be coppiced (rather than removed) to allow works to take place. However, the Applicant will consider adding some additional text in Section 7.2 of the LEMP at Deadline 7 to address this point.

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Following 6.2.23	Working in woodland	<i>Where possible, removal of vegetation will be timed to avoid the bird breeding season (March to August inclusive). Where tree or scrub removal during the breeding season is unavoidable, a check by the ECoW would be undertaken immediately prior to habitat removal to confirm that there are no occupied nests. Should any occupied nests be identified, an appropriate buffer zone (determined on the basis of the species concerned and the location of the nest in the context of the surrounding vegetation, but no less than 5m) would be implemented until the chicks have fledged.</i>	No change is proposed to the LEMP as paragraph 2.2.7 and 7.1.2 of the LEMP [REP3-034] already refer to good practice measure B02 which relates to bird breeding season. The Applicant does not consider it necessary to duplicate this text in 6.2.23.
Following 6.2.23	Working in woodland	<i>For trees in which bat roosts have been identified or which are identified as having bat roost potential, the measures set out for bat mitigation will be followed. No materials or vehicles, whether temporary or otherwise, shall be stored under crown spreads of trees.</i> Comments on the above additional text re. bat mitigation: "Has this been done? Can it be cross referenced? Needs to reference CoCP and EPS Report".	No change is proposed to the LEMP, as stated in paragraph 1.3.7 of the LEMP, the LEMP does not duplicate the measures set out within the relevant EPS Licences or actions required to comply with any permits or licences applied for on the project. Paragraph 2.6.2 of the LEMP states that the application for development consent includes the draft EPS licences for bats and dormouse and the draft badger licence. The final licences will be produced and submitted to Natural England in accordance with good practice measures B01 in the CoCP [REP3-026] . The final licences will contain the mitigation measures required to comply with legislation. All applicable works will be undertaken in accordance with the relevant requirements and conditions set out in those licences
6.3	Headings	Heading for 'Working near designated trees' moved to above paragraph 8.4.5.	The Applicant considers the heading to be appropriately located in the Chapter covering Vegetation Retention.
6.3.5	Standing advice for ancient woodland and veteran trees	The project has considered <i>will follow</i> the Forestry Commission and Natural England Standing Advice (2022) which states that 'For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage...'. Comments: 'These provisions are insufficient. Measure A1 should apply , unless otherwise agreed with the relevant local authority. Temporary access roads should not be included. That should be A2.' Agreed but delete ref to 'unless otherwise agreed etc. Comment: "All these exceptions require a detailed and location specific arboricultural method statement which needs to be agreed with the relevant local authority prior to works in this area starting". These will be recorded in a method statement <i>which will be agreed.</i> The project has considered <i>will follow</i> the Standing Advice on protecting veteran trees from development which states 'A buffer zone around... Comment: "As above. Revision required. Areas where measures are not practicable will need to be identified and agreed post consent in final LEMP."	The Applicant has sought to avoid areas of ancient and potential ancient woodland through the routing of the project, as outlined in ES Chapter 3: Alternatives Considered [APP-071] . There are four locations along the Order Limits where a 15m buffer cannot be maintained, including at Hintlesham Woods SSSI where the Applicant is proposing to use the existing overhead alignment through the woods. These locations and the works proposed are set out in the Technical Note on Ancient and Potential Woodland [REP3-046] . In these specific locations, Table 6.1 of the LEMP [REP3-034] sets out the measures that would be undertaken. Similarly, there is only one veteran tree that would be lost on the project (T378), all others will be retained with a suitable buffer based on the results of the arboricultural survey, as outlined in Table 6.2 of the LEMP [REP3-034] . The approach to both ancient woodland and veteran trees uses the same measures that were used on the Southampton to London Pipeline DCO (EN070005), which included the Approach to Ancient Woodland and Veteran Trees as Appendix C in the LEMP on that project [REP6-028] . The Applicant considers these methods to be suitable for protecting the trees from harm during the works necessary to construct this NSIP. As these measures are already detailed in the LEMP [REP3-034] and the LEMP already refers to AMS being agreed with the arboriculturalist, the Applicant does not consider there to be a need to agree further measures with the Councils post-consent on this matter.
6.4.2	Hedgerows	Hedgerows that do not require removal during the works would have not been identified on the detailed Vegetation Retention and Removal Plans submitted and approved as part of the detailed LEMPS <i>will be appropriately protected during construction. This may include suitable fencing to and provide a buffer which protects the rootzone from trafficking.</i> <i>For hedgerows where there are no protected species issues (e.g. they are not used as important commuting/foraging routes by bats, etc), the hedgerow does not qualify as an important hedgerow under the Hedgerow Regulations 1997, and removal of the hedgerow is not anticipated to have significant residual visual impacts, the following measures will be followed:</i> <i>a. The topsoil (including any bank) from beneath the hedgerow will be stripped and stored separately.</i> <i>b. Vegetation and topsoil from any associated ditch will be stripped and stored separately.</i> <i>c. Soil storage areas will be clearly signed and demarcated to prevent any mixing with other soils.</i>	No change is proposed to the LEMP, as hedgerows that are to be retained and removed are shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-133] . The measures for protection of hedgerows are detailed in Section 6.4 of the LEMP [REP3-034] . However, the Applicant will update the LEMP at Deadline 7 with the following measures with regards to all hedgerows on the project to reflect the Councils' proposed text: <i>a. The topsoil (including any bank) from beneath the hedgerow will be stripped and stored separately.</i> <i>b. Vegetation and topsoil from any associated ditch will be stripped and stored separately.</i> <i>c. Soil storage areas will be clearly signed and demarcated to prevent any mixing with other soils.</i>
6.4.2	Important hedgerows	<i>The mitigation measures for botanically important hedgerows, or those qualifying as important under the Hedgerow Regulations 1997 will be the same as above with the exception that, where viable, the following measures will be considered, discussed, and agreed with the relevant local authority:</i>	The Applicant notes that the majority of hedgerows on the project are botanically important and/or qualify as important under the Hedgerow Regulations 1997, as set out in ES Appendix 7.5: Important Hedgerows Assessment [APP-115] . The Applicant has already minimised the construction width and is proposing to coppice and use geotextile in locations where there is no underground cable installation or a requirement for a stone access route due to the size of vehicles. The vegetation

Ref	Matter	Submission from Third Party	Applicant's Comments
		<p>a. <i>The minimisation of the construction width, by coppicing the hedge plants and protection of the coppice stools, with a temporary roadway, wherever practicable and appropriate</i></p> <p>b. <i>The coppicing and removal to hedge plants, (shrubs) along the cable route to a location where they can be maintained and subsequently replaced into the boundary. Vegetation would first be strimmed to ground level.</i></p> <p>c. <i>Where possible, geotextile will be used for the running track to reduce the amount of topsoil being stripped (this will aid reinstatement of vegetation).</i></p>	<p>assumptions are described further in ES Chapter 4: Project Description [APP-072] and are also shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183].</p> <p>The Applicant also notes that it would not be practicable to temporarily remove, store and replace hedgerow plants, which in some locations could be up to four years, along the cable route and temporary access routes.</p>
6.4.2	Hedgerows with protected species	<p><i>Where hedgerows provide habitat for protected species, specific mitigation measures are addressed under the relevant protected species title.</i></p> <p><i>Where the removal of the hedgerows is anticipated to have significant residual visual impacts, or impact on Barbaestelle bats, because one or more pass by this species has been found along a hedge, in addition to the mitigation identified in the preceding sections, these hedgerows will be reviewed and special engineering measures will be considered in order to further reduce significant residual visual impacts. Engineering measures include a change to the typical trench sections, alteration of construction methodology and machinery which would enable the open cut trenches and haul road to be micro-routed through existing narrow gaps in the otherwise dense tree or hedge lines without loss of landscape character or setting.</i></p>	The Applicant has produced draft protected species licences for the project, including for dormouse (ES Appendix 7.8 Annex A: Dormouse Draft Licence [APP-120]) and bats (ES Appendix 7.7 Annex A: Bat Draft Licence [APP-118]) and would need to submit final licences to Natural England prior to construction. The draft licences set out the measures required in accordance with the relevant guidance and specific measures are not duplicated in the LEMP.
6.4.2	Hedgerows at CSE compounds	<i>In addition, clarification will be provided regarding the potential impact on hedgerows at the entrances to CSE compounds.</i>	The proposals relating to hedgerows at the entrance to the CSE compounds are shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183] and LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036]. In addition, the Applicant has also updated Requirement 9 of the draft DCO (Document 3.1 (F)) at Deadline 6 to state that: ' <i>Unless otherwise agreed with the relevant planning authority, the reinstatement planting plan submitted under sub-paragraph (1) will include a landscape plan for the cable sealing end compound where relevant for the stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.</i> '
6.4.2	Trenchless crossing of hedgerows	<i>If the pre-construction surveys and the Arboricultural Method Statement identify additional constraints at these hedgerows such that the measures outlined above will not adequately minimise the impact of the development, the use of trenchless techniques will be considered.</i>	It would not be practicable to use trenchless construction techniques to install the underground cables at multiple hedgerow crossings. This would be expensive (against the Applicant's duty to be economic and efficient) and would extend the construction programme. The majority of hedgerow crossings are small gaps created for the temporary access route, which is required along the length of the cable sections for the delivery of cable drums, therefore trenchless techniques could not be used for this.
6.5.1	Temporary bridge	Comment against 'A temporary clear span bridge is proposed...': "Detailed design and location plan needs to be approved prior to installation." [with reference to the above comment] "Is this covered somewhere"	The Applicant does not consider the need for temporary works to be agreed with the Councils or details to be provided in the LEMP. The design of the bridge will be submitted to the Environment Agency as part of the Flood Risk Activity Permit process. Further details can be found in Table 2.1 of the CEMP (Document 7.5 (C)).
6.5.4	Watercourses	Prior to carrying out any works to watercourses, a preconstruction check will be undertaken <i>by a SQE</i> to check for the presence of otter, water vole and any INNS.	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
6.8.2	Historic earthworks	<p>Comment against 'The project includes the removal of historic earthworks and hedgerows for temporary bellmouths or access routes': "I am doubtful as to the success of this approach. Historic environment comment also required".</p> <p>Comment against 'Any historic features associated with the lane will be reinstated at the end of construction to the pre-work condition, including the replanting of hedgerows and reinstatement of historic earthworks': "Are these really capable of restoration?"</p> <p>Comment: "Considerable number impacted"</p>	<p>The only historic earthworks that have been identified within the Order Limits that would be affected by the project are associated with the Protected Lane (Essex) and Historic Lane (Suffolk). Details regarding the proposed works can be found in Table 6.5 of the LEMP [REP3-034].</p> <p>Good practice measure H05 in the CoCP [REP3-026] states that '<i>A topographic survey will be undertaken in advance of construction of each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the lane, including banks and ditches. During construction, the contractor will seek to limit the working area to the narrowest section of the lane that is practicable for the specific works. Any historic features associated with the lane will be reinstated at the end of construction to the pre-work condition, including the replanting of hedgerows and reinstatement of historic earthworks.</i>'</p> <p>The impact assessment is presented in ES Chapter 8: Historic Environment [APP-076] concludes in paragraph 8.6.19 that with this good practice measure in place (H05), the direct effects to Protected Lanes and historic lanes would be a short term minor adverse effect, which is not significant.</p>
7.1.1	Vegetation loss	<i>Based on the surveys carried out to date, the following vegetation losses are expected:</i>	The assessment presented in the ES considers the overall value associated with hedgerows, trees and other habitats that would be affected within the Order Limits. As shown on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183],

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		<ul style="list-style-type: none">XXX Nos. trees (xx Nos, Veteran, xx Nos Category A, etc.)XXX m hedgerow (of which XXm are important hedgerows under the 1997 Hedgerow Regulations); losses for visibility splays are included in these figures.XXXXm2 woodland, with xxxxm2 being ancient or semi-ancient woodland.XXXXm2 grasslandXxxxm2 Other habitats. <p>These figures will be revised, once pre-construction surveys have been carried out, will be communicated to the relevant Local Authorities and will inform mitigation strategies, the Biodiversity Metric calculations and the detailed LEMPs for each section of the scheme.</p>	<p>very little vegetation would be affected during construction, and as per LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036], almost all of this is a temporary loss with vegetation being restated at the end of construction.</p> <p>The Applicant does not consider it necessary to report the temporary vegetation losses in the LEMP. Defra Metric 3.1 has been used to demonstrate reinstatement of the baseline conditions and the Environmental Gain Report [APP-176] sets out the enhancements proposed to deliver the 10% net gain. The Defra Metric (alongside any updates to LEMP Appendix A and B as per Requirement 9 and 10 of the draft DCO (Document 3.1 (F))) would be updated prior to construction, once the contractor has identified the final vegetation that would be affected. Requirement 13 of the draft DCO (Document 3.1 (F)) requires the Applicant to provide written evidence (in the form of the outputs of the biodiversity metric) demonstrating how at least 10% in biodiversity net gain is to be delivered as part of the authorised development.</p>
7.2.5	Tree works	Comment: 'Landscaping Contractor isn't a thing'. All tree works will be carried out by a specialist landscaping or arboricultural contractor	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
7.2.7 subsection heading	Heading reference	Other Ancient Woodland and Woodland Priority Habitat	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
7.3.1	Nesting birds	Any required hedgerow removal will be compliant with the Wildlife and Countryside Act 1981 which restricts the timings of this in relation to nesting birds.	No change is proposed to the LEMP as the existing commitment (good practice measure B02) is compliant with the Wildlife and Countryside Act 1981.
7.3.4	Cable swathe	Comment in relation to 'Where the 400kV underground cable crosses existing hedgerows, a gap of up to 60m will be created in the hedgerow and the roots would be grubbed out'. "Is this the narrowest working width?"	No change is proposed to the LEMP, as this is the narrowest width for the underground cable sections (reduced from the standard 80m width) given the splay of the cables, as shown on Design and Layout Plans Cable Working Cross Section [APP-027].
7.4.4	Terminology	Secondly, vegetation will be cleared down to ground level under the supervision of an ECoW ecologist.	The Applicant considers that an ecologist is the suitably qualified person to supervise this task. However, the Applicant will add further clarification regarding roles and the need to draw on suitably qualified specialists during construction.
7.4.6	Soft felling	Where high potential roosting features are present, the project will soft fell these under the supervision of an ECoW	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text with the supervision of an ecologist.
7.4.6	Bat roosts	Comment in relation to 'Where it is not practicable to attach limbs with potential roost features from trees with high bat roosting potential suitability to retained trees within the Order Limits, then additional bat boxes will be provided to avoid loss of these roosting opportunities.' This is what I asked for.	The Applicant welcomes this comment.
8.1.1	Reinstatement	This section sets out the general principles for how reinstatement and mitigation planting will be undertaken on the project. It includes the reinstatement of hard landscaping features such as walls and fences. It also covers soft landscaping, including the reinstatement of vegetation that has been removed and reinstatement of habitat areas and also mitigation planting, for example MM09 to the north of Hintlesham Woods.	The Applicant is unsure as to why the two sections in paragraph 8.1.1 of the LEMP [REP3-034] have been highlighted, as there is no accompanying comment.
8.1.2	Requirement wording	All reinstatement planting works referred to in Requirement 9 must be carried out in accordance with the relevant <i>approved</i> reinstatement planting plan for that stage of the authorised development, unless otherwise approved <i>agreed</i> by the relevant planning authority.	No change is proposed to the LEMP, as this is the wording from the Requirement 9 of the draft DCO (Document 3.1 (F)), which is based on standard wording used in DCO drafting.
8.1.3	Reinstatement	The general principle of reinstatement on the project is that land used temporarily will be reinstated where practicable (bearing in mind any restrictions on planting and land use) to its pre-construction condition and use. Hedgerows, fences and walls (including associated earthworks and boundary features) will be reinstated to a similar style and quality to those that were removed, in consultation with the landowner (GG07), <i>and as agreed with the relevant planning authority.</i>	No change is proposed to the LEMP, as noted on page 86 of the Schedule of Changes to the Management Plans [REP3-055], ' <i>where practicable</i> ' has been retained as this will depend on what the pre-site conditions were and what the end land use needs to be. For example, trees cannot be planted over the underground cables and the land use within the CSE compounds and GSP substation footprint will differ from the pre-project conditions. Reinstatement planting would already have been agreed as per Requirement 10 of the draft DCO (Document 3.1 (F)).

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8.1.4	Aftercare	In accordance with good practice measure LV03, and as stated in Requirement 10 of the draft DCO (application document 3.1), a five-year aftercare <i>and long-term management</i> periods will be established for mitigation planting and reinstatement (<i>five years for hedges, 10 years for trees and 15 years for woodlands</i>), unless a longer period has been defined through the project commitments (see paragraph 9.1.2 of the LEMP) or if otherwise agreed with the relevant planning authority.	No change is proposed to the LEMP, as this reflects the wording of good practice measure LV03 in the CoCP [REP3-026] and the wording of Requirement 10 (Document 3.1 (F)). The Applicant is proposing an aftercare period that is suitable for the proposed planting. This is for the life of the asset at the locations where embedded measures are proposed (measures EM-D01, EM-F01, EM-G03, EM-G06, EM-H02 in the REAC (Document 7.5.2 (D)), up to 30 years for the new woodland planting (MM09) to the north of Hintlesham Woods, and five years is considered suitable elsewhere which is typically regrowth of coppiced vegetation and replanting of hedgerows.
8.2.2 (second bullet)	Planting season	Reinstatement and any new planting, including any subsequent replacement of failed planting, will be carried out in the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use. For example, tree and scrub planting will typically be undertaken between November and the end of March <i>February</i> , avoiding periods of frosts, extreme cold and waterlogged conditions.	The Applicant is not proposing to shorten the season, as March is standard in landscape contracts and the success of the planting would be dependent on the weather and climate in any given year e.g. planting could take place if it is a cold March rather than deferring to the following winter. However, at the Councils' request, a sentence will be added to the LEMP [REP3-034] to explain that replacement planting should be undertaken as early within the season as practicable to give the best chance of success.
8.2.2 (fourth bullet)	Browsing	Tree and shrub planting areas will initially be protected to shield young trees from browsing rabbits and deer during establishment, for example using tree/shrub shelters or fencing. Protection, for example fencing will also be considered around planting in fields that are grazed by livestock.	The Applicant disagrees with this proposed removal. The shelters or fencing are examples of measures that could be used. There are other methods that can also be used to reduce the risk of browsing.
Before 8.4.1	Woodland soils	<i>Woodland soils will be replaced within the woodlands on completion of cable installations.</i>	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
Before 8.4.1	Planting ratio	<i>Where compliant with landscape objectives, replanting will be on a two for one basis (two planted for every one removed) with native species, preferably of local origin.</i>	No change is proposed to the LEMP, as Defra Metric 3.1 has been used to demonstrate reinstatement of the baseline conditions (this requires the planting of more than has been removed to achieve no net loss) and the Environmental Gain Report [APP-176] sets out the enhancements proposed to deliver the 10% net gain. This includes hedgerow reinforcement. Therefore, the Applicant considers it to be unnecessary to also commit to a two for one ratio for replanting.
Before 8.4.1	Veteran trees	<i>The mitigation strategy, if required, for the loss of any veteran trees or trees with veteran characteristics will be implemented.</i>	The Applicant has made a commitment with regards to the mitigation strategy for the single veteran tree (T378) that would be lost on the project (EM-G13 in the REAC (Document 7.5.2 (D))). The text will also be included in the LEMP at Deadline 7.
Before 8.4.1	Planting over cables	<i>Where trees cannot be planted over the cables, habitat continuity will be maintained through planting of shrub species.</i>	No change is proposed to the LEMP as this is already shown in LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036] .
Before 8.4.1	Land drains	<i>Where possible, the location of pre- and post-construction land drains will also be adjusted to avoid or minimise damage to tree roots.</i>	This change has been accepted but the text has been added to the CEMP at Deadline 6 (Document 7.5 (C)) which sets out the details on land drainage – see paragraph 9.3.7 of the CEMP (Document 7.5 (C)) where the text now reads ' <i>land drains will be adjusted to avoid or minimise damage to tree roots, where practicable</i> '.
8.4.10	Seed collection	In areas immediately adjacent to existing woodland, the soil is already likely to contain seeds that have fallen from the adjacent trees. These seeds will be used and supplemented where necessary with seeds collected from the <i>native</i> trees within nearby woodland areas (subject to landowner permission).	The Applicant is reviewing this comment and will respond further at Deadline 7.
8.4.10	Browsing	<i>Given the likely impacts caused by deer, rabbits and hares on potential saplings, deer and rabbit proof fencing will be provided. Badger gates and raptor posts will be included within such fences.</i>	No change is proposed to the LEMP, as browsing is covered in paragraph 8.2.2 of the LEMP [REP3-034] and the Applicant does not consider it necessary to duplicate here. The Applicant disagrees that fencing is the only solution for protection against browsing on a linear project of this nature, as the fencing will create a barrier to other wildlife.
8.4.11	Long term management	The aftercare <i>and long-term management</i> checks (see Chapter 9) will identify whether the habitat is establishing using natural regeneration methods or whether additional planting is required to achieve the habitat objectives. If further planting is required, this will use the same or other locally appropriate <i>native</i> species.	No change is proposed to the LEMP, as the Applicant does not consider it necessary to add long term management into the text.
8.4.12	Reinstatement	Addition and comment: To prepare the site, the soil will be ploughed or subsoiled to break up any compacted soil. <i>Then the stored topsoil will be replaced.</i> The site will be disced and repeatedly harrowed during the spring and summer to reduce successive flushes of weeds and to produce an even seedbed.	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
8.4.12	Natural regeneration	Comment: 'The detail of the method for natural regenerations will need to be agreed with suitably qualified specialists post consent in the final LEMP.'	The Applicant is reviewing this comment and will respond further at Deadline 7.

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8.5.1	Reinstatement	<i>Banks and ditches will be reformed to similar profiles as before.</i>	No change is proposed to the LEMP, as this is already covered in good practice measure GG07 in the CoCP [REP3-026] , which states that ‘ <i>Land used temporarily will be reinstated where practicable to its pre-construction condition and use. Hedgerows, fences and walls (including associated earthworks and boundary features) will be reinstated to a similar style and quality to those that were removed, in consultation with the landowner.</i> ’
8.5.1	Topsoil replacement	<i>Topsoil will be replaced after works in the reverse order that it was excavated to distinguish its difference from other stored topsoil.</i>	No change is proposed to the LEMP, as this is already stated in paragraph 11.3.36 of the CEMP (Document 7.5 (C)).
8.5.1	Reinstatement	<i>Replanting of hedgerows will take place in the first available planting season following construction.</i>	No change is proposed to the LEMP, as this is covered in Requirement 10 of the draft DCO (Document 3.1 (F)), which states ‘ <i>Unless otherwise agreed with the relevant planning authority, all reinstatement planting works referred to in Requirement 9 must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use.</i> ’
8.5.1	Planting ratio	<i>Replanting of hedgerows will aim to enhance baseline conditions i.e., through improved species diversity or replanting on a two for one basis (two planted for every one removed) where compliant with landscape objectives.</i>	No change is proposed to the LEMP as the reinstatement proposals are already shown on the LEMP Appendix B: Reinstatement Plan [REP3-036] , along with LEMP Appendix C: Planting Schedules [APP-185] which sets out the species mixes. Defra Metric 3.1 has been used to demonstrate reinstatement of the baseline conditions (this requires the planting of more than has been removed to achieve no net loss). The Environmental Gain Report [APP-176] sets out proposals for reinforcement of existing hedgerows to provide net gain on the project.
8.5.1	Planting mix	<i>Planting will use shrubs of the same species and in the same general proportions as existed pre-construction (native, preferably of local origin). The replanting mix and pattern will be established on the basis of a survey in accordance with the Hedgerow Regulations, 1997. Where single species hedgerows require replanting, this opportunity to enhance the species mix to contribute to biodiversity net gain.</i>	No change is proposed to the LEMP, as paragraph 8.2.2 of the LEMP [REP3-034] already states that trees and shrubs will be of local provenance. LEMP Appendix C: Planting Schedules [APP-185] set out the species mixes which have been determined based on the results of the habitat and hedgerow surveys. The Environmental Gain Report [APP-176] sets out proposals for reinforcement of existing hedgerows to provide net gain on the project. However, the Applicant will review the hedgerow survey results to see where single species hedgerows exist as SCC has requested that gaps created by the project are not planted with a diverse mix of species where this would change the character of the hedgerow. This will be reviewed as part of the updated LEMP at Deadline 7.
8.5.1	Species mix	<i>A schedule of species composition for reinstatement will be provided.</i>	No change is proposed to the LEMP, as this is already provided in LEMP Appendix C: Planting Schedules [APP-185] .
8.5.1	Hedge planting	<i>A detailed scheme of hedge planting aftercare will be provided, to be agreed with the relevant local authorities. This will include details of soil restoration and ground preparation, species choice, stock size and spacing and a program of weed control and aftercare to cover a period of five years, (ten years for hedges on the CSEC and substations sites).</i>	No change is proposed to the LEMP, as these details are already provided in the LEMP (or CEMP) as follows: <ul style="list-style-type: none"> • Soil restoration and ground preparation is contained in Chapter 11 of the CEMP (Document 7.5 (C)); • Species choice, stock size and spacing can be found in LEMP Appendix C: Planting Schedules [APP-185]; • Weed control is described in Section 9.2 of the LEMP [REP3-034]; and • The aftercare is 5 years (unless stated otherwise) as per Requirement 10 of the draft DCO (Document 3.1 (F)).
8.6.1	Grassland	<i>In all grassland, topsoil would be stripped, stored and replaced to retain the seed bank. Areas of improved grassland and verges disturbed by construction activities outside of the areas identified for natural regeneration, will be reinstated by seeding of an appropriate grass mix suited to the existing soil conditions and site use.</i>	The text will be amended in the LEMP at Deadline 7 to reflect the Councils’ proposed text.
8.6.1	Neutral grassland	<i>In neutral grassland areas, natural regeneration is preferred and no supplementary seeding would be used. For the sections where disturbance cannot be avoided (i.e. the cable trench) topsoil should be removed, stored and reinstated and the area left to recover naturally.</i>	The text will be amended in the LEMP at Deadline 7 to reflect the Councils’ proposed text along with reference to the locations where neutral grassland is present.
9.1.1	Reinstatement	As a general principle, at the end of construction, land used temporarily will be reinstated to an appropriate condition relevant at least equivalent to its pre-construction condition and its previous use’ (GG07).	No change is proposed to the LEMP, this is consistent with the wording of GG07 in the CoCP [REP3-026] and is a general principle applied across the whole project.
9.1.1	Handover	In many locations <i>that do not require aftercare</i> , the land will be handed back to the relevant landowner at the end of reinstatement.	The text will be amended in the LEMP at Deadline 7 to reflect the Councils’ proposed text.
9.1.2	Aftercare duration	Where vegetation including woodland, hedgerows and trees have been planted as part of the reinstatement and mitigation, these will have a five-year aftercare period (<i>five years for hedges, ten for years for trees and fifteen years for woodlands</i>) in accordance with good practice measure LV03 and Requirement	The Applicant is proposing an aftercare period that is suitable for the proposed planting. This is for the duration of the asset at the locations where embedded measures are proposed (measures EM-D01, EM-F01, EM-G03, EM-G06, EM-H02 in the REAC (Document 7.5.2 (D))), up to 30 years for the new woodland planting (MM09) to the north of Hintlesham Woods, and five years is considered suitable elsewhere which is typically regrowth of coppiced vegetation and replanting of hedgerows.

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		10(3) of the draft DCO (application document 3.1). In addition, National Grid will continue to maintain planting at the GSP substation and the CSE compounds for the life of the asset, in accordance with embedded measures EM-D01, EM-F01, EM-G03, EM-G06 and EM-H02 set out within the REAC (application document 7.5.2). National Grid will also maintain mitigation area MM09 to the north of Hintlesham Woods SSSI, for up to 30 years due to the importance of this site in meeting an objective to improve habitat connectivity between Ramsey Wood and Wolves Wood, and to enable the woodland planting to achieve the growth rates predicted and secure its long-term viability.	
9.1.3	Terminology	Periodic checks will be undertaken by a suitably <i>qualified experienced</i> professional to check reinstatement and to replace species <i>plants</i> that have not taken. The landscape contractor will prepare inspection reports as part of these visits <i>and submit a copy to the relevant Local Authority</i> .	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
9.1.4	Detailed LEMP	<i>A programme for maintenance visits and inspections will be provided within the detailed LEMP for each section of the project.</i>	No change is proposed to the LEMP, as the Applicant does not consider a detailed LEMP to be required.
9.1.4	Aftercare	<i>To ensure development of the planting to a satisfactory standard, there will be an agreed procedure for joint annual inspection of all planting areas by representatives of the relevant Local Authority and developers at the end of each growing season and for each year of the aftercare period (ten years for woodlands and tree planting and five years for hedge and scrub planting), following implementation. Areas found not to be thriving will be treated to such additional works as are required to rectify the situation within the next growing season.</i>	No change is proposed to the LEMP, as the Applicant does not consider there to be a need for the Councils to attend annual inspections of all planting areas, as the Applicant regularly undertakes landscape contracts across the country for its maintenance and permitted development activities.
9.1.4	Aftercare duration	<i>Suspension of the aftercare period for any part of the scheme may occur in the event that in the opinion of the relevant Local Authority there was a significant failure of the planting scheme that could not be satisfactorily remedied in the following planting season, and or part of the planting scheme was failing to progress to the extent that it would not achieve the objectives of the scheme within the specified aftercare period.</i>	The Applicant is proposing an aftercare period that is suitable for the proposed planting. This is for the duration of the asset at the locations where embedded measures are proposed (measures EM-D01, EM-F01, EM-G03, EM-G06, EM-H02 in the REAC (Document 7.5.2 (D))), up to 30 years for the new woodland planting (MM09) to the north of Hintlesham Woods, and five years is considered suitable elsewhere which is typically regrowth of coppiced vegetation and replanting of hedgerows.
9.1.5	Aftercare	Prior to the end of the five year aftercare period, a final inspection will be undertaken at which any final replacement planting required shall be communicated to the landowner <i>and the relevant Local Authority</i> . Following the completion of any <i>the</i> agreed replacement planting, a final inspection will then be held <i>with representatives of the Local Authority</i> as part of the completion of the aftercare, whereupon National Grid shall cease to have any further maintenance obligation.	The Applicant will remove reference in the LEMP to five years before aftercare as requested by the Councils. The Applicant will also add to a sentence to the LEMP at Deadline 7 to notify the Local Planning Authority when the aftercare period is complete. The Applicant does not consider there to be a need for the Local Planning Authority to be on the final inspection, as the Applicant regularly undertakes landscape contracts across the country for its maintenance and permitted development activities, however, if considered beneficial to all parties, this could be organised at the relevant time. The Applicant notes that it undertakes similar activities to that proposed on the project across its network and is used to implementing landscape contracts on its projects.
9.2.1	Inspections	The five year aftercare includes inspections by a suitably <i>qualified</i> professional for all reinstated woodland, hedgerows, tree belts and individual trees to <i>will include</i> :	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text but retaining 'suitably' to match the language requested elsewhere in relation to 'qualified'.
9.2.1	Planting season	Check and record failing, dead or defective plants and replace failed planting each year, between November and end of February <i>March</i> , until the target stocking density is achieved;	The Applicant is not proposing to shorten the season, as March is standard in landscape contracts and the success of the planting would be dependent on the weather and climate in any given year e.g. planting could take place if it is a cold March rather than deferring to the following winter. However, at the Councils' request, a sentence will be added to explain that replacement planting should be undertaken as early within the season as practicable to give the best chance of success.
9.2.1	Herbicides	Apply herbicide to maintain weed-free plant circles around base of transplants and spot-treat undesirable species, having regard to <i>complying with</i> any restrictions on use of herbicides in certain locations, for example, in proximity to watercourses or other sensitive habitats. Selective hand weeding may be required where there are no suitable alternative methods;	The text will be amended in the LEMP at Deadline 7 to reflect the Councils' proposed text.
9.2.1	Mulching	Comment: "Mulching should be included as part of the establishment."	The Applicant is considering this comment and will provide feedback at Deadline 7.
9.2.2	Site inspections	Inspections will also be undertaken to any areas that were coppiced during construction to check that the coppicing is re-establishing. This will confirm that	The Applicant would be responsible for the site inspections as part of its aftercare and does not consider that it needs to provide a detailed programme of when these would occur.

Ref	Matter	Submission from Third Party	Applicant's Comments
		<p>these areas are regenerating as planned or will identify the need for further measures, such as additional planting where the coppicing is not leading to successful regrowth. In addition, an arboriculturalist will also be consulted to advise on whether veteranising of existing individual trees is appropriate as part of the aftercare and management.</p> <p><i>A detailed programme for the above measure will be provided in the detailed LEMPs for each section of the project.</i></p>	
10.1.1	Detailed LEMP	<p>National Grid will <i>provide detailed LEMPs and Landscaping schemes for each section of the scheme and in accordance with this OLEMP. The LEMPs will</i> put in place robust procedures to inform and supervise all those working on the project including its contractor, to make sure the control measures set out in the OLEMP are adopted when undertaking the construction of works authorised by the DCO. The main responsibility for implementing these control measures will fall to the contractor.</p>	No change is proposed to the LEMP, as the Applicant does not consider a detailed LEMP to be required.
10.2.2	Terminology	<p>Regular site checks will be carried out to monitor compliance with the <i>respective</i> LEMP. The programme of site inspections will be managed by the Environmental Manager who will draw on appropriate suitably experienced <i>qualified specialists</i> for specific tasks. The overarching inspections are summarised below in Table 10.1. Immediate action including, if necessary 'stopping a job', will be taken should any incidents or non-conformance with the LEMP be found during inspection.</p>	The word 'experienced' will be replaced by 'qualified' in the LEMP at Deadline 7 to reflect the Councils' proposed text and match the terminology used elsewhere.
10.3.1	Terminology	<p>Comment: 'by a suitably qualified and licensed (where required) person': This is now consistent throughout.</p>	Noted. This change has already been made to the LEMP [REP3-034].
10.3.2	Site inspections	<p>Site inspections will be undertaken to check whether habitats are returning to their pre- construction condition. The baseline habitat surveys will provide the evidence of the pre- construction conditions and will be used to establish site specific targets for the habitat reinstatement. The aim of the site inspections is to identify whether adaptive measures need to be taken so that these sites achieve the habitat conditions required (i.e. pre- construction quality and value).</p> <p><i>A detailed programme for these site inspection will be provided in the detailed LEMPs for each section of the scheme.</i></p>	The Applicant would be responsible for the site inspections as part of its aftercare and does not consider that it needs to provide a detailed programme of when these would occur.
10.4.2	Detailed LEMP	<p>The monitoring requirements, including locations and frequency of inspections, will be set out <i>in the detailed LEMPs within</i> as per the finalised EPS licence applications and will be agreed with Natural England. Any corrective actions that may be required will be agreed with Natural England and implemented as required.</p>	No change is proposed to the LEMP, as the Applicant does not consider a detailed LEMP to be required.

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