

# NORWICH TO TILBURY

EN020027

## Comments on Submissions received at Deadline 2

Suffolk County Council [REDACTED]

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## Glossary of Acronyms

<i>AMS-OWSI</i>	<i>Archaeological Mitigation Strategy and Outline Written Scheme of Investigation</i>
<i>BNG</i>	<i>Biodiversity Net Gain</i>
<i>CoCP</i>	<i>Code of Construction Practice</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>DWSI</i>	<i>Detailed Written Scheme of Investigation</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>HDD</i>	<i>Horizontal Directional Drilling</i>
<i>HEMP</i>	<i>Historic Environment Management Plan</i>
<i>HER</i>	<i>Historic Environment Record</i>
<i>LIR</i>	<i>Local Impact Report</i>
<i>LPA</i>	<i>Local Planning Authority</i>
<i>LPAAA</i>	<i>Local Planning Authority Archaeological Advisors</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>RSCF</i>	<i>Regional Skills Coordination Function</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SEP</i>	<i>Skills and Employment Plan</i>

*UU Unilateral Undertaking*

*“BDC” refers to Babergh District Council; “MSDC” refers to Mid Suffolk District Council; “BMSDC” refers to BDC and MSDC jointly; “SCC” refers to Suffolk County Council; and “the Councils” refers to BDC, MSDC, and SCC jointly.*

## **Purpose of this Submission**

The document has been prepared by Suffolk County Council to respond to the Applicant’s submissions, and where appropriate representations made by other interested parties, received at Deadline 2 (“**D2**”) for Norwich to Tilbury. Examination Library references are used throughout to assist readers.

## Comments on submissions received at Deadline 2

Table 1: 3.5 (A) Schedule of Changes to the Draft DCO [REP2-008]			
Table Item	Service Area and/or Topic	SCC's Comments	References
1.1	DCO	<p>SCC does not have any comments to make on the changes given the following reference numbers –</p> <ul style="list-style-type: none"> <li>i. Ref. 1 (Article 2, Interpretation)</li> <li>ii. Ref. 2 (Article 2, Interpretation)</li> <li>iii. Ref. 4 (Article 2, Interpretation)</li> <li>iv. Ref. 5 (Article 2, Interpretation)</li> <li>v. Ref. 6 (Article 2, Interpretation)</li> <li>vi. Ref 7. (Article 12, Application of the Permit Schemes)</li> <li>vii. Ref 8. (Article 21, Protective works)</li> <li>viii. Ref 9 to 15. (Schedule 1, Authorised Development)</li> <li>ix. Ref 16. to 18. (Schedule 3, Requirements)</li> <li>x. Ref 19. and 20. (Schedule 3, requirement 5 (archaeology) – please see SCC’s reply to <b>ExQ1 DCO1.S8</b> for SCC’s proposed amendments to this requirement.</li> <li>xi. Ref 21. Schedule 3, Requirements (Paragraph 14)</li> <li>xii. Ref 24. Schedule 4, discharge of Requirements (Paragraph 4(2)(a))</li> <li>xiii. Ref 25. Schedule 11, land of which temporary possession may be taken</li> <li>xiv. Ref 26. Schedule 16, Protective Provisions</li> </ul> <p>SCC would make the following comments in respect of the following remaining amendments –</p>	

	<p><b>Ref. 3 (article 2 (interpretation))</b> – “An amendment in response to feedback from South Norfolk District Council in its Local Impact Report to future -proof the draft DCO against potential re-structuring of local/unitary government to ensure that any successors in function are expressly covered”.</p> <p>Owing to the inclusion of article 2(8) (which states that references in the Order to any statutory body includes that body’s successor in respect of functions which are relevant to the Order) SCC does not consider the amendment necessary.</p> <p><b>Ref 22. (Schedule 3, Requirements (Paragraph 14))</b> – (“An amendment to include a new noise requirement agreed between the Applicant and the undertakers for the Five Estuaries and North Falls Wind Farm Projects”).</p> <p>SCC will defer to the local planning authorities’ comments in respect of this requirement.</p> <p><b>Ref. 23 (Schedule 4, discharge of Requirements (Paragraph 3(1)(b))</b> – this amendment concerns the fee to be paid for the discharge of requirements. Please see row 12 of SCC’s table (below) which responds to Table 3.25 of Applicant’s Response to Local Authority comments on the draft DCO.</p>	
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<b>Table 2:</b> 7.2 (B) Outline Code of Construction Practice (Tracked) <a href="#">[REP2-015]</a>				
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC's Comments</b>	<b>References</b>
2.1	Public Health	<p><b>2.2.3, 2.2.4, 2.2.5, 2.2.7</b></p> <p><i>It is assumed that the core working hours for construction (as set out within Requirement 6 of the draft DCO (document reference 3.1)) would be:</i></p> <ul style="list-style-type: none"> <li><i>i. Monday to Friday: 07:00 to 19:00</i></li> <li><i>ii. Saturdays, Sundays, Bank Holidays and other public holidays: 07:00 to 17:00.</i></li> </ul> <p><i>No percussive piling works would take place outside of the hours of 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays.</i></p> <p><i>Unless otherwise agreed with the Local Highway Authority, no Heavy Goods Vehicle (HGV) deliveries would be made to site outside of the hours of 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays.</i></p> <p><i>[...]</i></p> <p><i>The core working hours exclude:</i></p>	<p>SCC (Public Health) maintains the position as detailed in <b>[REP1-178]</b> in respect to working hours. Construction activity should be limited to Monday–Friday: 08:00–18:00 and Saturday: 08:00–13:00, with no works permitted on Sundays or Bank Holidays, except in exceptional circumstances agreed in advance with SCC. Start up and close down periods should be strictly limited to no more than one hour either side of the core hours and must exclude any activity likely to cause disturbance to nearby residents or businesses.</p>	<p><b>[REP1-178]</b></p> <p><b>[REP2-014]</b></p>

		<p><i>i. Start up and close down activities up to 1 hour either side of the core working hours.</i></p>		
2.2	Public Health	<p><b>2.2.6, 2.2.8</b></p> <p><i>The following operations may take place outside of the core working hours:</i></p> <p><i>i. Trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses</i></p> <p><i>ii. The installation and removal of conductors, pilot wires and associated protective netting (included but not limited to) across highways, railway lines or watercourses</i></p> <p><i>iii. The jointing of underground cables</i></p> <p><i>iv. The continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused</i></p> <p><i>v. Any highway works requested by the Local Highway Authority to be</i></p>	<p>SCC (Public Health) notes that the Applicant’s proposed list of activities that may be undertaken outside core working hours as detailed in paragraphs 2.2.6 and 2.2.8. SCC (Public Health) considers that, as currently drafted, this list is overly broad and insufficiently justified, with the potential to give rise to significant and prolonged disturbance to nearby communities, particularly in relation to noise, sleep disruption and associated health and wellbeing effects. The inclusion of numerous construction activities as standard exceptions risks undermining the purpose of core working hours as a primary mitigation measure.</p> <p>SCC (Public Health) considers that certain categories of activity are reasonable and should be retained, including emergency works, security monitoring and HDD. These are inherently time critical or necessary to protect safety and do not lend themselves to restriction. However, some other activities listed are not on the face of it intrinsically dependent on being undertaken outside of core working hours and therefore require clearer justification or removal.</p> <p>In particular, activities such as cable jointing, intrusive and non-intrusive surveys, mechanical and electrical installation within enclosed buildings, and oil processing of transformers are presented as general exceptions without sufficient explanation as to why they cannot reasonably be programmed within core hours. These activities have the</p>	[REP2-014]

		<p><i>undertaken on a Saturday or Sunday or outside the core working hours</i></p> <p><i>vi. The testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities</i></p> <p><i>vii. The completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities</i></p> <p><i>viii. Activity necessary in the instance of an emergency where there is a risk to persons or property</i></p> <p><i>ix. Security monitoring</i></p> <p><i>x. Non-intrusive surveys</i></p> <p><i>xi. Intrusive surveys</i></p> <p><i>xii. Oil processing of transformers or reactors in substation sites</i></p> <p><i>xiii. Delivery to the transmission works of abnormal loads and any highway works requested by the Local Highway Authority to be</i></p>	<p>potential to generate noise, vibration, lighting and general disturbance and should not be assumed to be acceptable undertakings outside of core working hours without a clear and evidence-based rationale. SCC (Public Health) therefore considers that these elements should either be withdrawn from the list of standard exceptions or be subject to a case-by-case approval process.</p> <p>Similarly, the provision allowing for the completion of works delayed by severe weather is currently too permissive. It is acknowledged that some flexibility may be required, however, the definition provided is broad and could enable routine extension of working hours.</p>	
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		<p><i>undertaken outside the core working hours</i></p> <p>xiv. <i>Mechanical and electrical installation works within buildings once erected and enclosed.</i></p> <p>[...]</p> <p><i>The severe weather conditions referred to means any weather which prevents work from taking place during the core working hours by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access or otherwise) or being contrary to safe working practices.</i></p>		
2.3	Flood and Water Environment	<b>Table 5.1 (Anticipated licences, assents, consents and permits)</b>	SCC (Flood and Water) notes that there is no reference to the Land Drainage Act 1991 consent requirements for temporary or permanent crossing from the Lead Local Flood Authority or Internal Drainage Board.	
2.4	Archaeology	<p><b>6.1.16</b></p> <p><i>Construction and operation (and maintenance) phase management measures in relation to Hydrology, Land Drainage and Flood Risk are contained in the following:</i></p>	Impacts on archaeology and palaeoenvironmental deposits must also be considered within the Hydrological Assessment. De-watering or changes to groundwater regimes can be highly destructive to sensitive deposits, especially those with the potential to preserve organic remains. Such impacts may result in irreversible loss of archaeological and palaeoenvironmental information. Therefore, hydrological modelling and mitigation strategies must be developed in consultation with the Historic	

		<ul style="list-style-type: none"> <li>• <i>Mitigation measures / environmental commitments in Table 6.1.</i></li> <li>• <i>Outline Flood Warning and Evacuation Plan (see Appendix G)</i></li> <li>• <i>Surface Water Management Plan – this Plan has not been prepared to support the Outline CoCP because the detailed design is not yet known. This Plan will demonstrate how runoff across the site will be controlled and how any off-site effects will be managed and mitigated and will be prepared by the Main Work(s) Contractor.</i></li> </ul>	<p>England Regional Science Advisor and integrated into the wider environmental management framework.</p>	
2.5	Archaeology	<p><b>Table 6.1 (GG08)</b></p> <p><i>Where features are to be retained (including veteran trees, ancient woodland, high, medium and low value trees, hedgerows, watercourses and archaeological/ heritage assets where practicable), an appropriate protective area or</i></p> <p><i>protection mechanisms will be established using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary.</i></p>	<p>Management for the protection of archaeological and other heritage assets must be secured through an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b>, which will detail the production of a Historic Environment Management Plan (“<b>HEMP</b>”). This document should set out clear methodologies for the preservation and protection of heritage assets throughout all phases of the project (construction, operation, enhancement and decommissioning). The HEMP should be developed in consultation with the Historic England Regional Science Advisor and relevant local authority archaeological advisors or heritage advisor to ensure it reflects best practice and is proportionate to the significance and sensitivity of the affected heritage assets.</p>	<b>[APP-328]</b>

<p>2.6</p>	<p>Landscape</p>	<p><b>Table 6.1 (B08)</b></p> <p><i>All hedgerows, shrubs, trees or dense vegetation will be retained as far as is practicable. Where these measures are not practicable and works are needed to be carried out during the bird breeding season, all areas to be affected will be checked by the ECoW for evidence of nesting birds 24 hours (as standard) prior to the vegetation modification or removal or tree felling works taking place. There may be some instances where 24 hours is not practical, therefore a maximum period of 48 hours is permitted with contractors having a duty of care to look out for birds prior to removal. If any active bird nests are discovered these will be given a minimum standoff of 5 m (this may increase depending on species, proposed works and location) where no potentially disturbing works will take place until the young have fledged and the nest is vacated. A second nesting bird check would then be undertaken to ensure the tree or vegetation does not contain any further active nests prior to felling or removal works taking place</i></p>	<p>SCC (Landscape) considers this commitment should be strengthened from ‘as far as practicable’ to ‘as far as possible’.</p>	
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<p>2.7</p>	<p>Archaeology</p>	<p><b>Table 6.1 (GH11)</b></p> <p><i>At trenchless crossings, and where otherwise indicated in the ES, within Appendix 9.3: Groundwater Baseline and Qualitative Groundwater Risk Assessment (document reference 6.9.A3), a Hydrogeological Risk Assessment will be undertaken to assess the specific risks to groundwater and groundwater receptors (including impacts on groundwater flow and levels, and the risk of breakout of drilling fluids and turbidity, where appropriate) at those locations and identify any additional mitigation or remediation that may be required. The nature and scope of any mitigation or remediation will be agreed with the Environment Agency or other stakeholders, as appropriate.</i></p>	<p>GH11 should be amended to require the hydrological risk assessment to assess the hydrological risk to sensitive archaeological deposits, deposits with palaeoenvironmental potential and archaeological finds identified during the post-consent geoarchaeological and palaeoenvironmental assessment. Hydrological risk assessment to sensitive archaeological deposits, deposits with palaeoenvironmental potential and archaeological finds must also be included in an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b>.</p>	<p><b>[APP-328]</b></p>
<p>2.8</p>	<p>Archaeology</p>	<p><b>Table 6.1 (H03)</b></p> <p><i>The location of known archaeological remains or areas where archaeological investigations will be undertaken (i.e., excavations) will be signposted/ fenced off to avoid unintentional damage.</i></p>	<p>To avoid unintentional damage to archaeological heritage assets, all relevant management measures must be included in the live constraints mapping for the project. This ensures that heritage assets and sensitive areas are clearly visible and accessible to all teams involved in construction, operation, and decommissioning activities. Early identification and mapping of these constraints is essential to ensure effective avoidance and mitigation.</p>	

<p>2.9</p>	<p>Archaeology</p>	<p><b>Table 6.1 (H04)</b></p> <p><i>Where a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and agree a solution that protects the significance of the new discovery, through preservation</i></p> <p><i>or excavation and recording, whichever is practicable within the Project construction requirements.</i></p>	<p>While the commitment to notify the Local Planning Authority (“LPA”) upon the discovery of previously unknown or unexpectedly significant heritage assets is welcomed, it is essential to emphasise the importance of early-stage archaeological evaluation to minimise such risks.</p> <p>Archaeological evaluation (geophysical survey and trial trenching) is a critical component of the pre-application and pre-consent process. These combined methods help identify areas of archaeological sensitivity, assessing the significance of known and unknown assets, and inform the development of mitigation strategies. Early identification enables the project to integrate mitigation into the project timetable, reducing the likelihood of unexpected discoveries and ensuring compliance with policy and best practice guidance.</p> <p>We would advise the following amendment to H04 add clarity to the commitment:</p> <p><b><u>For areas of the project where an agreed programme of archaeological investigation has been undertaken, and where land has been released for construction to commence, should</u></b> previously unknown <i>heritage asset</i> <b><u>be</u></b> discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and agree a solution that protects the significance of the new discovery, through</p>	
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			<p><i>preservation or excavation and recording, whichever is practicable within the Project construction requirements.</i></p> <p>This amendment clearly sets out a process to be followed, where land is released for construction to commence, and unexpected archaeology is encountered by construction teams.</p>	
2.10	Landscape	<p><b>Table 6.1 (H06)</b></p> <p><i>Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impact to each Protected Lane (Essex) and Historic Land (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 Protected/Historic Lane, including associated banks and ditches. During construction, the Main Works Contractor(s) will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction</i></p>	<p>SCC (Landscape) welcomes the further clarification of the Applicant’s commitments to Protected/Historic Lanes.</p> <p>Any other comments made by SCC in its Relevant Representation [RR-3520] and/or the Joint Suffolk Local Impact Report [REP1-178] with regards to Landscape and Visual still stand.</p>	

		<p><i>activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, replacement (compensatory design elements) will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).</i></p>		
2.11	Archaeology	<p><b>Table 6.1 (W06)</b></p> <p><i>Where a main river is crossed by a trenchless crossing, the cables will be laid at least 1 m below the hard bed level of the river and will remain at or below this level for not less than 3 m from the brink of the riverbank. Marker posts shall also be positioned on each bank of the river to indicate the location of the under-crossing and the nature of the works. The Project proposed the following trenchless crossings (as detailed in Table 4.9 within ES Chapter 4: Project Description (document reference 6.4)):</i></p>	<p>Where a main river is crossed by a trenchless method (such as horizontal directional drilling or microtunnelling) the design of that crossing must take into account the potential for archaeological and palaeoenvironmental remains and their preservation. River valleys often contain deeply stratified and organic-rich deposits, including peat and alluvium, which may preserve significant archaeological and palaeoenvironmental evidence.</p> <p>For Section C River Stour (north part), River Stour (south part) SCCAS would like to highlight that in 6.9.A4 Environmental Statement Appendix 9.4 – Hydrological Risk Assessment <b>[APP-185]</b> paragraph 7.1 states that the western cable corridor of the Stour crossing would be unsuitable for HDD and the Eastern might be possible.</p> <p>To avoid disturbance or degradation of these sensitive deposits, the crossing design should be informed by appropriate geoarchaeological and palaeoenvironmental assessment and developed in consultation with the Historic England Regional Science Advisor. This will ensure</p>	<b>[APP-185]</b>

			<p>that the methodology is proportionate and aligned with best practice for the protection of sensitive archaeological heritage assets.</p> <p>Please see comment on GH11 on hydrological risk assessment for archaeology.</p>	
2.12	Archaeology	<p><b>Table 6.1 (W21)</b></p> <p><i>Drainage ponds and outfalls serving temporary works during construction of the Project will be removed following construction, and the land reinstated.</i></p>	<p>SCCAS would like to highlight that the Drainage Ponds and Outfalls are impacts which will require archaeological trial trenching prior to their construction to inform appropriate archaeological mitigation. Ground disturbance associated with their construction has the potential to significantly impact archaeological heritage assets that are known and currently unknown.</p>	

<b>Table 3:</b> 7.4 (C) Outline Landscape and Ecological Management Plan (Tracked) <a href="#">[REP2-019]</a>				
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC’s Comments</b>	<b>References</b>
3.1	Landscape	Overall	SCC (Landscape) notes that Revision C the OLEMP comprises predominantly minor changes (mainly changes to references to updated versions of other documents). SCC’s previous comments on the OLEMP, as presented in the Relevant Representation <a href="#">[RR-3520]</a> and the Local Impact Report <a href="#">[REP1-178]</a> therefore still stand.	<a href="#">[RR-3520]</a> <a href="#">[REP1-178]</a>
3.2	Ecology	Overall	SCC (Ecology) acknowledges the alterations to the OLEMP and awaits the inclusion of the requirement for the initiation of the Ecology Working Group in the next revision of the document.	
3.3	Archaeology	1.2.2	<p>There needs to be a paragraph in the 1.2 Project Overview section stating that:</p> <p><i>“The historic environment must be a material consideration when selecting land for environmental mitigation, ecological offsetting, and Biodiversity Net Gain (BNG), including land located outside the project Order Limits. Archaeological assessment and evaluation should inform site selection and the design of mitigation measures so that heritage assets are identified, understood, and appropriately protected or recorded before any enhancement or habitat creation is implemented.”</i></p> <p>Mechanisms for habitat creation often have significance adverse impacts on archaeological heritage assets. Any impacts will need archaeological mitigation. This is why we are advising the addition of the above paragraph.</p> <p>All archaeological works would be undertaken in accordance with the approved Archaeological Mitigation Strategy and Outline Written</p>	

			Scheme of Investigation (“ <b>AMS-OWSI</b> ”) and a Detailed Written Scheme of Investigation (“ <b>DWSI</b> ”), which will be submitted and approved by the relevant LPAAA.	
3.4	Archaeology	1.4	<p>Offsite Biodiversity Net Gain (“<b>BNG</b>”) must be delivered in a way that recognises and protects buried archaeological heritage assets. Site selection, design and delivery of habitat creation or enhancement must be informed by archaeological assessment so that damaging interventions (for example tree planting, pond creation, or soil inversion/de-nitrification used for heathland and species-rich grassland) are avoided, minimised or mitigated before works commence.</p> <p>Please see comments on 1.2.2 for further details on how this can be addressed in the OLEMP.</p>	
3.5	Archaeology	2.2	Where advance works are proposed, archaeology must be consulted as many habitat creation or enhancement methods are excessively damaging to buried archaeological remains (tree planting, pond creation and soil de-nitrification for heathland and species rich grassland creation, etc). It is therefore essential that archaeology is taken into account when choosing locations.	
3.6	Archaeology	3.3	For clarity in project delivery and risk reduction it is important to implement a live project constraints mapping so all environmental, archaeological, ecological, and operational constraints are recorded, visualised, and kept up to date in a single, accessible system for project staff.	
3.7	Archaeology	5.3	Archaeology must be consulted as many habitat creation or enhancement methods are excessively damaging to buried archaeological remains (tree planting, pond creation and soil de-nitrification for heathland and species rich grassland creation, etc). It	

			is therefore essential that archaeology is taken into account when designing habitat replacement and protection measures.	
3.8	Archaeology	Table 5.4	<p>SCCAS notes that clay breakouts from proposed HDD river crossings of the Stour could cause significant environmental harm, and any mitigation for drilling clay breakouts must explicitly consider archaeological impacts. Hydrological changes associated with the works may adversely affect archaeological heritage assets both within and beyond the Order Limits redline. SCCAS notes that 6.9.A4 Environmental Statement Appendix 9.4 – Hydrological Risk Assessment <b>[APP-185]</b> paragraph 7.1 states that the western cable corridor of the Stour crossing would be unsuitable for HDD and the Eastern might be possible.</p> <p>Reinstatement of arable habitat has the potential to cause substantial damage to buried archaeological remains, such areas must therefore be subject to archaeological evaluation and, where necessary, mitigation. Areas identified and agreed for in-situ archaeological preservation must be managed under the AMS-OWSI and by separate DWSIs or a Preservation in situ management plan.</p> <p>Close, ongoing coordination between all Clerks of Works identified in the OLEMP and the Archaeological Clerk of Works is essential to ensure the ecological and archaeological requirements are delivered smoothly and without conflict.</p>	<b>[APP-185]</b>
3.9	Archaeology	6	The LEMP must be developed and implemented in close coordination with the AMS-OWSI to ensure that species mitigation and habitat works are planned and delivered alongside archaeological works.	
3.10	Archaeology	6.1.35	Archaeology needs to be a consideration for displacement of Water Voles.	

3.11	Archaeology	7.5.15	The project needs to understand the archaeological implications of their removal. As the survival of veteran trees tend to relate to survival of historic parkland or historic boundaries.	
3.12	Archaeology	7.7	<p>These are likely to have archaeological impacts, particularly on well preserved waterlogged archaeological remains and palaeoenvironmental information.</p> <p>Geoarchaeological and palaeoenvironmental assessment will be required to inform specific archaeological methodology will need to be developed to mitigate these impacts. I.e. development of a Peat Management Strategy and Deep waterlogged archaeological excavation strategy.</p>	
3.13	Archaeology	7.7.6	<p>SCCAS would like to highlight that in 6.9.A4 Environmental Statement Appendix 9.4 – Hydrological Risk Assessment <b>[APP-185]</b> paragraph 7.1 states that the western cable corridor of the Stour crossing would be unsuitable for HDD and the Eastern might be possible, this is contradictory to the statement in 7.7.6 of the OLEMP.</p>	<b>[APP-185]</b>
3.14	Archaeology	9.1	The relevant LPAAA will need to review the indicative landscape design in order to provide advice on the archaeological implications of the habitat creation in these locations.	
3.15	Archaeology	SCCAS Recommendation	<ul style="list-style-type: none"> <li>• The Historic Environment is considered as part of the Environment within in the OLEMP.</li> <li>• <b>Early assessment:</b> Undertake full geoarchaeological and palaeoenvironmental assessment of the river valleys to inform appropriate archaeological mitigation.</li> <li>• <b>Integrated mitigation planning:</b> undertake full archaeological evaluation to ensure CoCP, AMS-OWSI and LEMP work together so that drilling, spoil management, and reinstatement methods are designed to avoid or minimise</li> </ul>	

			<p>disturbance to archaeological deposits; where avoidance is not possible, undertaken appropriate mitigation, informed by the results of archaeological evaluation.</p> <ul style="list-style-type: none"> <li>• <b>Hydrological risk assessment:</b> Assess potential hydrological changes from HDD and associated works and evaluate their likely impacts on <b>archaeological heritage assets</b> and important deposits; incorporate findings into both ecological and archaeological mitigation strategies. Consultation with the Historic England regional science advisor for the eastern region is strongly advised.</li> <li>• <b>Management of preserved areas:</b> Document any areas to be preserved in situ and manage them through the AMS-OWSI, DWSIs, HEMP and live constraints mapping, with clear responsibilities, monitoring regimes, and long-term maintenance arrangements.</li> <li>• <b>Clerks of Works coordination:</b> Establish communication protocols and regular joint site meetings between the Archaeological Clerk of Works and all ecological/engineering Clerks of Works named in the OLEMP to coordinate works, inspections, and unexpected discoveries.</li> <li>• <b>Contingency procedures:</b> Put in place a written unexpected archaeological finds procedure linked to the OLEMP so that discovery, recording, temporary protection, and decision-making are consistent throughout the CoCP, AMS-OWSI and LEMP.</li> </ul>	
3.16	Landscape	New paragraph 9.4.3	<p>SCC (Landscape) welcomes the proposed targeted gap planting of hedgerows (paragraph 9.4.3) and would welcome further information with regards to location, quantities and species choices in due course.</p>	

<b>Table 4:</b> 8.5.5 (A) Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]				
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC's Comments</b>	<b>References</b>
4.1	Planning	<p><b>Table 2.1 (Applicant's response to issues raised by organisations during the hearings)</b></p> <p>Suffolk County Council [REP1-177]</p>	<p>SCC (Planning) considers that cross-referencing to other documents without direction to the relevant paragraph or table item within the document is intentionally obstructive to the Council's ability to respond.</p>	

<b>Table 5:</b> 8.8.2 (A) Applicant's Comments on Local Impact Reports [ <a href="#">REP2-030</a> ]				
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC's Comments</b>	<b>References</b>
5.1	Overall Approach	<p><b>Table A.2</b></p> <p><i>The Applicant's Regard to the Suffolk County Council / Babergh District Council / Mid Suffolk District Council Local Impact Report</i></p>	<p>Suffolk County Council (Planning) finds the Applicant's response to the Joint Suffolk LIR to be wholly unacceptable in its extreme brevity. Table A.2 is no more than a sign-posting exercise in which the Applicant refers to sections of the pre-existing Application documentation (including the ES) which address the topics raised by the Councils in the Joint Suffolk LIR. No attempt is made in that exercise to engage with the specific issues identified in the LIR nor to respond to the concerns about the shortcomings in the way in which the impacts resulting from Application are proposed to be dealt with by the Applicant. The Council acknowledges that the Applicant has (in Table 3.25) made specific responses to the issues raised about the terms of the draft DCO but, if anything, this serves to underscore the paucity of the Applicant's response to the remainder of the Joint Suffolk LIR.</p> <p>The Council invested significant time in the production of the Joint LIR with the purposes of furthering the Examination of the Proposed Development and improving its impact should the ExA be minded to recommend the Scheme for approval to the Secretary of State.</p>	

			<p>Whilst a topic-based approach to responding collectively to LIRs where generic issues are concerned (such as need or the general approach to alternatives) is understandable, considering the volume of information across the LIRs about the local impacts of the proposals on environmental assets and communities in Suffolk, SCC would have expected a specific and focused response to those matters, which are not raised by the other Councils whose responsibilities do not include Suffolk. Whilst some of the local impacts raised in the Joint Suffolk LIR are addressed in the Applicant’s Responses on New Matters and Applicant’s Clarifications in the tables dealing with individual environmental topics, this exercise is by no means comprehensive and no explanation is provided as to why some matters are addressed but others are not. SCC will make clear its position on all matters in the next iteration of the Statement of Common Ground.</p>	
5.2	Landscape and Visual	<p><b>3.10.11 – 3.10.14</b> Adequacy of landscape and visual mitigation provided</p>	<p>SCC (Landscape) acknowledges that it is not possible to fully mitigate the scheme’s landscape and visual effects. However, where mitigation is not possible, SCC considers that for non-mitigable effects, in particular, but not exclusively, significant effects, compensation needs to be considered. NPS-EN1 supports this and requires the Applicant to set out how residual impacts will be compensated for as far as possible (section 4.2).</p>	

5.3	Landscape and Visual	<p><b>3.10.10</b></p> <p>Following the implementation of the embedded and standard mitigation, 6.13 Environmental Statement Chapter 13 - Landscape and Visual <b>[APP-226]</b> identifies significant adverse residual effects during operation on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. The effects reduce to not significant levels beyond this.</p>	<p>SCC (Landscape) considers that this statement by the Applicant underlines the need for Landscape compensation, which matches the residual impacts and effects.</p>	
5.4	Landscape and Visual	<p><b>3.10.12</b></p> <p>Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects.</p>	<p>Neither NPS EN-1 nor SCC (Landscape) expect that all residual effects can be removed. However, for those that cannot be removed compensation is the last resort and needs to be applied. Compensation will not remove or mitigate the residual effects, as this is, by definition, not possible, but provide something different, for example landscape and visual enhancement, improved access to the countryside, better doorstep green spaces, etc., to make up for compensate for the residual effects.</p>	
5.5	Landscape and Visual	<p><b>3.12</b></p> <p>Replacement Tree Planting</p>	<p>Paragraph 3.12.2 states that full details of the compensatory measures for veteran trees are to be agreed post consent and refers to the 7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy <b>[APP-323]</b>. However, SCC (Landscape) is not</p>	

			reassured by paragraph 3.8.3 that compensation measures are not currently proposed in the strategy for ancient woodland and paragraph 5.1.2 stating that the options to deliver as part of a compensation package are considered based on the practicalities of implementing such measures in collaboration with the landowners. SCC would therefore welcome a stronger commitment by the Applicant regarding compensation for both ancient woodlands and ancient/veteran trees.	
5.6	Legal Agreement to secure Tree Replacement Planting and Biodiversity Net Gain	<p><b>3.12.10</b></p> <p><i>“The Applicant has prepared and shared with the local authorities, Heads of Terms regarding a unilateral undertaking (“UU”) to be given by National Grid to the Local Planning Authorities along the Project route under section 106 of the Town and Country Planning Act 1990 (‘s.106 UU’), relating to obligations designed to secure off-site planting required as a result of the 3:1 replanting commitment. [...] It is not considered that a bilateral agreement or a requirement is necessary.”</i></p> <p><b>3.13.20</b></p> <p><i>“The Applicant has prepared Heads of Terms regarding a unilateral undertaking to be given by National Grid to the Local Planning Authorities along the Project route under s.106 of the Town and Country Planning Act</i></p>	<p>Converse to the Applicant’s stated position, SCC (Planning) considers that a Unilateral Undertaking (“UU”) is not appropriate for the purposes of securing Trees Replacement Planting or Biodiversity Net Gain.</p> <p>As Unilateral Undertakings cannot include bilateral obligations, there are some limitations to what can be included in this form of agreement compared to a standard planning obligation. For example, the UU form would not allow for reciprocal obligations for the LPAs to approve a document within a certain time period, or to inspect or remedy ecological works at the Applicants cost.</p>	

		<p>1990 ('s.106 UU'), relating to obligations designed to secure at least 10% BNG as part of the Project. [...] It is not considered that a bilateral agreement or a requirement with 3.1 Draft Development Consent Order <b>[APP-056]</b> is necessary or appropriate”</p>		
5.7	Landscape and Visual	<p><b>3.12.13</b></p> <p>The final veteran tree mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis.</p>	<p>SCC (Landscape) considers that these measures also need to be agreed with the relevant local authority.</p> <p>Given that these measures would be agreed on a case-by case basis, SCC ask for clarification on how these individual agreements will be included in the final LEMP.</p>	
5.8	Landscape and Visual	<p><b>3.12.20</b></p> <p>A number of local authorities have commented in their LIRs that the 3:1 commitment is not compensation but comprises reinstatement planting. The Applicant considers that the delivery of on-site (within the Order Limits) reinstatement planting comprises reinstatement/mitigation, but the delivery of off-site (outside the Order Limits) planting under the 3:1 commitment would comprise compensation.</p>	<p>As stated in the LIR <b>[REP1-178]</b>, SCC (Landscape) considers that the off-site tree planting the Applicant has committed to is compensatory in the sense that the trees cannot be replaced where they were lost. However, SCC does not consider this to be the same as landscape and visual compensation, which in SCC’s view would require co-ordinated landscape restoration enhancements. The proposed trees could be utilised within such wider restoration proposals.</p>	
5.9	Landscape and Visual	<p><b>3.12.21 – 3.12.26</b></p>	<p>Further to the comments provided in the LIR <b>[REP1-178]</b>, it is based on monitoring experience of recent years, that SCC (Landscape) considers five years’</p>	

		Aftercare period for planting and planting failure rate	aftercare to be insufficient for trees and woodland and only just acceptable for hedgerows and simple grassland communities, resulting from erratic weather patterns. SCC therefore considers that adaptive aftercare needs to include a clear temporal element, which will prolong the aftercare period if significant failings in the plantings result in developmental setbacks to plantings in year 5 of aftercare, so that they are not fit to be handed over.	
5.10	Socio-economics, Recreation and Tourism	<p><b>3.16.8</b></p> <p><i>“In response, to elaborate on what the Applicant set out in response to Relevant Representations and without prejudice to the Applicant’s position that such matters do not constitute mitigation, the Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5”</i></p>	<p>SCC (Skills) welcomes the Applicant’s commitment to submit an Employment and Skills Plan.</p> <p>However, as outlined in its previous submissions <b>[REP2-040]</b>, SCC requests that the Applicant goes further than this by committing to a DCO-secured Skills and Employment Plan.</p> <p>SCC expects the Skills and Employment Plan (“<b>SEP</b>”) to provide clear and detailed workforce requirements for all phases of the project, including workforce numbers, skills, role durations, and the anticipated level of both home-based and non-home-based employment. This information is essential to enable SCC, in its role operating the Regional Skills Coordination Function (“<b>RSCF</b>”), to undertake coordinated workforce planning across Suffolk’s major projects and to manage cumulative pressures on the labour market. The SEP should set out how the Applicant will work with the RSCF to align training provision, address specific skills</p>	

			<p>gaps, and contribute to a “right skills, right time” pipeline that maximises opportunities for local residents, supports project delivery, and contributes to long-term legacy skills development across the region.</p> <p>A local education and training strategy should be developed jointly with the RSCF, demonstrating how the Applicant will engage effectively with FE, HE and private providers. This should include support for coordinated curriculum and programme planning and the development of inclusive pathways such as apprenticeships, Bootcamps and modular or short-course training. The Applicant is expected to explain how it will assist RSCF-led engagement with providers, reduce duplication of provision, and help create clear, accessible progression routes for local residents into project-related employment.</p> <p>The SEP should also describe how the Applicant will share information on supply-chain workforce requirements with the RSCF, enabling a coordinated approach to identifying skills gaps and strengthening local supply-chain capacity where feasible. This includes working with the RSCF and economic partners to ensure supply-chain businesses are aware of upcoming opportunities and can plan for training, recruitment and upskilling in a timely and efficient way.</p> <p>To support effective regional alignment, the SEP must set out how the Applicant will contribute to coordinated workforce planning across Suffolk’s NSIPs and other</p>	
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			large developments. This includes committing to early and ongoing information-sharing on project timelines and skills needs so that the RSCF can build accurate county-wide labour market intelligence and manage potential competition for labour. The Applicant should also commit to participating in joint monitoring and governance arrangements through existing structures, using agreed performance measures covering employment, training delivery and supply-chain outcomes.	
5.11	Landscape and Visual	<b>Paragraph 3.18.37</b> Requirement 8 Retention and Removal of Trees, Woodland and Hedgerows	SCC (Landscape) considers that Tree Protection Plans need to be submitted to and agreed by the relevant local authority prior to any works commencing.	
<b>Table 3.25</b> Suffolk County Council, Babergh District Council and Mid Suffolk District Council – Applicant’s Response to Local Authority comments on the draft DCO				
5.12	DCO	<b>Article 3(6) (development consent etc. granted by the Order) –</b> <i>The Applicant has not currently identified any buildings that would need to be demolished. If demolition was to be required, it would be due to unforeseen circumstances. The Applicant is considering SCC’s representation and will provide an updated draft 3.2 Explanatory Memorandum [APP-057] at Deadline 3.</i>	SCC notes that the Applicant has not currently identified any building that would need to be demolished under article 3(6). Owing to this, SCC queries the need for the inclusion of this provision in the draft Order. In any event, SCC looks forward to the updated Explanatory Memorandum at Deadline 3.	

5.13	DCO	<p><b>Article 12(2)(d) (application of the permit schemes) –</b></p> <p><i>The Applicant responded to this representation in its response to SCC’s relevant representations in the following terms:</i></p> <p><i>National Grid notes SCC’s comments and is content to amend Article 12(2)(d) of 3.1 Draft Development Consent Order [APP-056] (draft DCO) in order to refer in both instances to ‘the relevant highway authority’. The Applicant has updated the draft DCO accordingly.</i></p>	<p>SCC welcomes these amendments to article 12(2)(d) of the draft DCO [REP2-005] and considers this issue resolved.</p>	
5.14	DCO	<p><b>Article 23 (removal of human remains) –</b></p> <p><i>The Applicant notes the authorities’ comments on Article 23 (removal of human remains) of the draft Development Consent Order and will consider whether drafting amendments are appropriate and necessary for inclusion in the revised draft Development Consent Order that will be submitted at Deadline 3.</i></p>	<p>SCC looks forward to the revised draft Development Consent Order that will be submitted at Deadline 3.</p>	

<p>5.15</p>	<p>DCO</p>	<p><b>Article 34(1) (time limit for exercise of authority to acquire land and rights compulsorily) –</b></p> <p><i>The Applicant responded to this representation in its response to SCC’s relevant representations in the following terms:</i></p> <p><i>National Grid refers to the justification already provided in Paragraph 3.38.1 of 3.2 Explanatory Memorandum [APP-057]:</i></p> <p><i>‘When paired with the programme and nature and scale of the Project, National Grid is of the view that seven years is justified. A period of seven years is preceded in other Orders, including the East Anglia ONE North Offshore Windfarm Order 2022 and the East Anglia TWO Offshore Windfarm Order 2022. The Statement of Reasons (document reference 4.1) provides further details on compulsory acquisition and time limits.’</i></p> <p><i>The Applicant notes the authorities’ comments on the “usual position” but reiterates that for a project of this nature and scale, its position remains that seven years is proportionate and justified.</i></p>	<p>The applicant says: “The Statement of Reasons (document reference 4.1) provides further details on compulsory acquisition and time limits”; however, in relation to article 34(1), the Statement of Reasons [REP2-009] merely states: “Article 34 (Time limit for exercise of authority to acquire land compulsorily): The time period stated is after the end of the period of seven years beginning with the day on which the Order comes into force”. (paragraph 4.3.8).</p> <p>Regarding the cited precedents, the Secretary of State’s decision letter in respect of the East Anglia One North Offshore Wind Farm Order dated 31 March 2022 includes, at paragraph 26.7 the following text in respect of the inclusion in that Order of a seven-year period for the use of compulsory acquisition powers –</p> <p>“The Applicant seeks to vary the statutory time period for the use of compulsory acquisition powers from five to seven years [ER 29.2.11]. The Applicant justified this on the basis that uncertainties relating to Contract for Difference rounds meant that a realistic timetable would be based on allocation round 5 rather than the forthcoming allocation round 4, and that the intention to initially take temporary possession and then seek permanent rights based on the final location of the infrastructure supported a seven year period whilst not contradicting the pressing need argument for additional</p>	
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			<p>renewable energy infrastructure [ER 29.5.52 et seq.]. The ExA was satisfied with the Applicant’s proposed approach and concluded that the seven year period in Article 19 was satisfactory [ER 29.5.19]. On 9 February 2022 the Secretary of State announced that CfD rounds will be in future be conducted on an annual basis. The Secretary of State has considered the Applicant’s position in light of this request and concludes that despite the change to the timing of future CfD round it is appropriate to grant a seven year period, in particular noting the Applicant's intended approach to minimising the amount of land that will be compulsorily acquired”.</p> <p>The Secretary of State’s decision letter dated 31 March 2022 for the East Anglia Two Offshore Wind Farm Order includes identical text at paragraph 26.7.</p> <p>It is clear from paragraphs 26.7 of the decision letters that there were two project-related reasons which justified the extension of the standard 5-year period to 7 years for the East Anglia ONE North and East Anglia TWO projects (i.e. the uncertainty related to the Contract for Difference rounds – which has since been dealt with – and the applicants’ approach to first taking temporary possession of land and then seeking permanent rights based on the final location of the infrastructure).</p>	
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			<p>The instant Explanatory Memorandum [REP2-006] says the extended time period “will enable National Grid to construct pursuant to temporary use powers and then exercise the powers of compulsory acquisition after construction”. It is not clear from the EM (or, indeed, any other document) why five years is not enough time to allow this to happen, particularly given the applicant’s aim to deliver the project by the end of 2030, which would suggest that compulsory acquisition powers would need to be exercised before the expiration of seven years.</p>	
5.16	DCO	<p><b>Article 49(5) (traffic regulation)</b>  <i>The Applicant notes the authorities’ comments on Article 49(5) (traffic regulation) of the draft Development Consent Order and will consider whether drafting amendments are appropriate and necessary for inclusion in the revised draft Development Consent Order that will be submitted at Deadline 3.</i></p>	<p>SCC looks forward to the revised draft Development Consent Order that will be submitted at Deadline 3.</p> <p>An example of a recently made DCO which includes a provision similar to that requested by SCC is the Gatwick Airport (Northern Runway Project) Development Consent Order 2025 (SI 2025/1054) which includes, at article 18(8) (traffic regulations) –</p> <p>“(8) A copy of the instrument referred to in paragraph (7)(a) must be held at the registered office address of the undertaker for inspection during normal working hours and a copy must be sent to each of Surrey County Council and West Sussex County Council”.</p>	
5.17	DCO	<p><b>Schedule 3 (requirements) (paragraph 1 (interpretation)) –</b></p>	<p>SCC looks forward to the Applicant’s update at Deadline 3.</p>	

		<p><i>The Applicant responded to this representation in its response to SCC’s relevant representations in the following terms:</i></p> <p><i>The definition of ‘discharging authority’ included in Schedule 3 to the 3.1 Draft Development Consent Order [APP-056] (draft DCO) is deliberately drafted so as not to name specific authorities or bodies, noting the different geographies and authorities involved in the Project.</i></p> <p><i>The adopted approach is well-precedented by other DCOs.</i></p> <p><i>However, National Grid recognises that certainty is required by all parties over which bodies are defined as a discharging authority. National Grid will therefore seek to work with local authorities to consider further how responsibility for discharge of requirements between different bodies can be clarified.</i></p> <p><i>National Grid will also review the definitions used in the draft DCO to check whether any amendments can be made to ensure any greater clarity.</i></p> <p><i>The Applicant will provide an update at Deadline 3.</i></p>		
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5.18	DCO	<p><b>Schedule 3 (requirements) (paragraph 1 (interpretation)) –</b></p> <p><i>The Applicant has updated the draft Development Consent Order to reflect the authorities' requested amendment.</i></p>	<p>SCC welcomes this amendment to paragraph 1(4) of Schedule 3 to the draft DCO [REP2-005] and considers this issue resolved.</p>	
5.19	DCO	<p><b>Schedule 3 (requirements) (requirement 3(2) and (3) (stages of authorised development)) –</b></p> <p><i>The Applicant has updated the draft Development Consent Order to replace the 28 day period with 14 days to mirror the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024.</i></p>	<p>SCC considers the 14-day period is preferable to the original 28-day period; however, SCC considers the provision of this information could be done much quicker. Requirement 3(4) only requires the undertaker to notify the relevant planning authority of the commencement and completion of construction of each stage of the authorised development. Such a notice could be issued much sooner without causing any administrative burden for the undertaker. Owing to this SCC considers notice should be given within 7 days of the relevant event occurring. SCC does not consider that the provision of the information would be unreasonable or administratively onerous and requests the provision is amended accordingly.</p>	
5.20	DCO	<p><b>Schedule 3 (requirements) (requirement 5(2) (archaeology))</b></p> <p><i>The Applicant has updated the draft Development Consent Order accordingly.</i></p>	<p>Please see SCC's answer to <b>ExQ1 DCO1.S8</b> which concerns requirement 5 (archaeology).</p>	
5.21	DCO	<p><b>Schedule 4 (discharge of requirements) (paragraph 1, timescales)</b></p>	<p>SCC maintains its position, as set out in paragraphs 14.69 to 14.72 of the LIR [REP1-178] regarding the insufficiency of 28-days for determining applications</p>	

	<p><i>The Applicant responded to this representation in its response to SCC’s relevant representations in the following terms: National Grid acknowledges these comments. However, National Grid considers that the time limits included within Schedule 4 to 3.1 Draft Development Consent Order [APP-056] are necessary and proportionate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government’s Clean Power target of 2030, is not unnecessarily delayed by means outside the control of the Applicant. Furthermore, Annex 2 of the National Energy System Operator’s (NESO) Clean Power 2030 Report published in November 2030 identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031. It is noted that there is already scope within Paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) to extend the 28-day period for the discharge of Requirements by agreement in writing between the undertaker</i></p>	<p>under Schedule 4 and that the period should be 56 days.</p> <p>Further detail regarding why, in practice, 28 days will not work is set out SCC’s reply to <b>ExQ1 DCO1.A2</b>.</p>	
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5.22	DCO	<p><b>Schedule 4 (discharge of requirements) (paragraph 2, further information) –</b></p> <p><i>Given the Project’s status as a project of critical national importance, the Applicant considers five days for the relevant discharging authority to request additional information to be proportionate and appropriate. It aligns with the timeframe in the draft National Grid (Sea Link) Order. Paragraph 2(4) of Schedule 4 to the 3.1 Draft Development Consent Order [APP-056] allows the relevant authority to seek the Applicant’s consent to request further</i></p>	<p>In paragraph 14.73 of its LIR <b>[REP1-178]</b> SCC stated that 7 days was not enough time for the request for information to be made under paragraph 2 of Schedule 4 to the draft DCO <b>[REP-2005]</b>. The reference to 7 days was an error: the period proposed in paragraph 2 is 5 days. The effect of paragraph 2 is that it demands that the discharging authority makes a preliminary decision on an application within 5 days. This is preposterous. If a reasonable period is not provided, applications will be refused and this will cause greater delay to the delivery of the authorised development than would be the case if a reasonable period were provided.</p>	

		<p><i>information after the five day period if necessary. The Applicant has been, and continues to be, committed to collaborative working with the relevant authorities.</i></p>	<p>It will be appreciated that deciding whether further information is needed requires an extensive review of the submitted documents by officers of various technical disciplines which is unfeasible to complete in 5 days. The Order makes provision of 28 days to decide applications, the bulk of which time is spent reviewing the submitted documents to reach a conclusion on whether they fulfil the obligations set out in the requirement. It is only once the documents have been thoroughly reviewed that it can be decided whether an application includes sufficient information for the requirement to be discharged. There is no limit to how many applications can be submitted to a discharging authority at once meaning it is possible for the discharging authority to be expected to review multiple applications amounting to many hundreds of pages of technical detail in just 5 days. It will also be appreciated that, owing to the location of the discharging authorities, that they will be dealing with applications from multiple DCOs at the same time.</p> <p>SCC considers a more reasonable time limit of 21 days (within an overall determination period of 56 days) would give the discharging authority adequate time to decide whether an application contains sufficient information.</p> <p>Further information on the insufficiency of 5/28 days is included in SCC’s reply to <b>ExQ1 DCO1.A2</b>.</p>	
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<p>5.23</p>	<p>DCO</p>	<p><b>Schedule 4 (discharge of requirements) (paragraph 3, fees)</b></p> <p><i>The Applicant does not consider it appropriate or proportionate to require payment of the application fee for any consent sought under the draft Development Consent Order, some of which will be very minor in nature. The Applicant has been, and is committed to, collaborative working and proposes to enter into post-consent planning performance agreements that are intended to work alongside the provisions of the draft Development Consent Order to facilitate this. The Applicant would reimburse the host authorities for reasonably and properly incurred costs in progressing the agreed workstreams, as it has done for the Application Stage planning performance agreements. In relation to paragraph 3(1), the Applicant has amended the draft Development Consent Order to refer to the current national fee schedule applicable to the discharge of planning conditions. The drafting proposed by the Applicant in this paragraph has precedent in a number of recent development consent orders, including the National Grid (Yorkshire Green Energy Enablement Project) Development</i></p>	<p>The only reason any discharging authority will be doing any work is because of the undertaker’s project. It is reasonable to expect the discharging authority’s costs for doing that work to be covered by the undertaker.</p> <p>This argument is heightened when we consider (i) the extraordinary powers that the Order grants to the undertaker (for example, deeming provisions) which will require any discharging authority’s officers to prioritise work arising from the Order over other work and (ii) the number of DCOs which the discharging authorities will have to deal with at any one time.</p> <p>Since there is no other source for the funding of this essential work, it is essential that the authorities’ costs of doing the work is covered.</p> <p>Notwithstanding the above, SCC welcomes the applicant’s commitment to enter into a post-consent Planning Performance Agreement (“PPA”) with SCC and looks forward to discussions on that PPA beginning in earnest as soon as possible.</p>	
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		<p><i>Consent Order 2024 and the National Grid (Bramford to Twinstead Reinforcement) Order 2024. In relation to paragraph 3(2) the Applicant considers it reasonable to request a refund of the application fee in the instances provided for, not least where a planning performance agreement is in place. This provision has precedent in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The Applicant proposes to enter into post-consent Planning Performance Agreements, the contents of which will be discussed and agreed with the relevant stakeholders in due course.</i></p>		
5.24	DCO	<p><b>Schedule 16 (protective provisions) – Part 4 of Schedule 16 includes provisions for the protection of highway authorities</b></p> <p><i>The Applicant shared the draft protective provisions in favour of the local highway authorities on 22 July 2025 with Suffolk County Council (as well as the other Highways Authorities) requesting any comments. This version of the Protective Provisions was then included in the draft Development Consent Order at submission, pending negotiation with the Highways Authorities. Whilst National Grid has not yet</i></p>	<p>SCC, along with the other highways authorities, is considering the joint highways framework agreement and is aiming to return its comments to the applicant on that document as soon as possible.</p>	

		<p><i>received any response to this from Suffolk County Council, it has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the local highways authorities are jointly appointing legal advisors to advise in relation to the Protective Provisions (or an joint highways framework Agreement). Confirmation of the legal advisors acting is awaited. It is the Applicants understanding that the Highways Authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the Highways Authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council’s comments) to all the Highways Authorities and we await comments.</i></p>		
<p><b>Table 4.10</b> Biodiversity Ecology and Nature Conservation (Ecology and Biodiversity) – Responses to New Matters and Applicant Clarifications</p>				
5.25	Ecology	<p><b>Table 4.10 (9.2)</b>  <i>Following the completion of additional habitat surveys over 2025, the completed survey area is now 97% of the Order Limits.</i></p>	<p>SCC (Ecology) still requests mapping to be made available detailing the location of the unsurveyed section. 3% of the entire schemes is an area in excess of 3 miles in length and we would like assurances, and</p>	

		<p><i>The remaining 3% has been mapped from detailed aerial imagery (fixed wing drone survey) and average habitat condition scores applied. This approach has been discussed and agreed in principle with Natural England and the justification of this approach is set out within the 7.1 Biodiversity Net Gain Report [APP-299]. Although surveys did not cover 100% of the Order Limits, this is not uncommon for projects of this scale; the 97% survey coverage achieved is considered more than sufficient to undertake an accurate assessment of the ecological impacts of the Project as presented within 6.8 Environmental Statement Chapter 8 -Ecology and Biodiversity [AS-026]. Assumptions on the remaining 3% are also presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The Applicant disagrees that further detail is needed on the remaining 3% of land within the Order Limits.</i></p>	<p>seek confidence, that an area of this size has not been overlooked and under assessed. Currently, we are not aware of the locations of any of the unsurveyed area.</p>	
5.26	Ecology	<p><b>Table 4.10 (9.5)</b></p> <p><i>The Applicant disagrees that additional mitigation is required over and above what is already proposed within the 7.4 Outline Landscape and Ecological Management Plan (Revision C) for reptiles at Sroughton Park</i></p>	<p>SCC (Ecology) had requested additional mitigation <u>where required</u>. In this case our concern was that mitigation may be provided to replace lost habitat, but in a location where it was accessible by the retained population, due to temporary loss of habitat to bare ground. If this has been considered in the design</p>	

		<p><i>County Wildlife Site (CWS). The proposed works within Sproughton Park CWS and other 'key reptile sites' would be micro-sited to avoid impacts on ecologically important features including those for reptiles. This commitment is set out within Section 7 of the 7.4 Outline Landscape and Ecological Management Plan (Revision C). In addition, Section 6 of 7.4 Outline Landscape and Ecological Management Plan (Revision C) sets out the requirements for creation of hibernacula into areas outside the works areas, to ensure no net loss of these hibernation features, during the short term, for the local reptile population. These measures would ensure the functionality of the key reptile sites, including Sproughton Park CWS, are maintained during construction.</i></p>	<p>process and locating of hibernacula at this site will prevent any such severance of connectivity between usable habitat features, we would consider this mitigation adequate.</p>	
5.27	Ecology	<p><b>Table 4.10 (9.10)</b></p> <p><i>The Applicant acknowledges the large scale and complexity of the Project and sees the value in setting up an Ecology Working Group for the construction phase. This Ecology Working Group would be formed post-consent to provide progress updates on ecological mitigation, as set out within 7.4 Outline Landscape and Ecological</i></p>	<p>SCC (Ecology) welcomes the acknowledgement of the requirement for an Ecology Working Group. We concur with the comments regarding the proposed participants and that this should be included as a requirement in the next revision and final version of the OLEMP. We look forward to receiving the draft terms of reference for our comment and approval. We agree that this would be a post consent matter but would request that the detail within the LEMP stipulates that the group be set up and</p>	

		<p><i>Management Plan (Revision C) and 7.2 Outline Code of Construction Practice (Revision B) during the construction period. The Ecology Working Group would include the Ecological Clerk of Works and suitably qualified and experienced members from the Local Planning Authorities, Wildlife Trust/s and Natural England on their request and agreement with the Applicant. The next iteration of the Outline Landscape and Ecological Management Plan will be updated to include the requirement for a post-consent Ecology Working Group.</i></p>	<p>made active, prior to the start of pre-commencement works associated with the development not prior to the construction phase.</p>	
5.28	Ecology	<p><b>Table 4.10 (9.42)</b></p> <p><i>7.1 Biodiversity Net Gain Report [APP-299] provides an indicative Biodiversity Net Gain (BNG) assessment, based on information known at the time of submission. This included baseline data as of the end of May 2025, with 87.5% of the site being subject to detailed habitat surveys and the remaining 12.5% being mapped from detailed aerial imagery (fixed-wing drone survey). This approach has been discussed and agreed in principle with Natural England. Post-consent the baseline habitat information would be updated, and the Project would be subject to detailed design. The BNG metric would be re-</i></p>	<p>SCC (Ecology) accepts that the update to the metric to include the additional areas could be undertaken post-consent.</p> <p>It is presumed that the new calculations will be based on an incorporation of 9.5% of additional survey data rather than 12.5%. As 3% remains unsurveyed and was presumably previously included within the aerial imagery data and will be included as it was in the original calculation.</p>	

		<p><i>run with the updated baseline and refined impact assessment and any BNG deficit (that cannot be delivered within the Order Limits) would be delivered off-site in line with the approach already set out within 7.1 Biodiversity Net Gain Report [APP-299]. The Project has committed to delivering 10% BNG with environmental and societal benefits.</i></p>		
5.29	Ecology	<p><b>Table 4.10 (9.55)</b></p> <p><i>The Project role and responsibilities of the various clerk of works, environmental managers, work supervisors and technical specialists are set out within Table 3.1 of 7.4 Outline Landscape and Ecological Management Plan (Revision C). The various Ecological Clerk of Works (ECoW) would be suitably qualified based on industry good practice. These roles would be delivered by multiple individuals across the Project, depending on the specific requirement/task. Further detail on the multiple specific individuals undertaking these roles would be available post-consent as part of the final Landscape and Ecological Management Plan/s.</i></p>	<p>SCC (Ecology) would expect the final detail of the ECoW to be presented to the Ecology Working Group for comment and discussion prior to finalisation of the role.</p>	
5.30	Ecology	<p><b>Table 4.10 (9.59)</b></p>	<p>SCC (Ecology) appreciates the commitment to reducing hedgerow removal. We would however like</p>	

		<p><i>The Applicant can confirm that where hedgerow removal/management is required to facilitate visibility splays at highway accesses, the amount of hedgerow removal will be reduced as much as possible and instead the hedgerow will be cut to stump. This will allow sufficient visibility to ensure safety measures while allowing the hedgerow to grow back on completion of works. The commitment is already outlined within Section 8 of the 7.4 Outline Landscape and Ecological Management Plan (Revision C).</i></p>	<p>strengthening of the wording and assurance that wherever temporary access, either pre-planned or as a variation of the original design, occurs, removal will not take place unless there is no practical alternative and that this removal is preceded by a visit by the ECoW who concurs that no alternative is possible.</p>	
<p><b>Table 4.14</b> Health and Wellbeing – Responses to New Matters and Applicant Clarifications</p>				
5.31	Public Health	<p><b>Table 4.14 (17.80 and 17.85)</b></p> <p><i>There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified. Table 10.14 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] contains the findings from the assessment of potential impacts on mental health and wellbeing during the construction phase and includes opportunities for mitigation such as appropriate communication and awareness-raising of construction activities. The approach to informing PRow users of changes to the PRow network during</i></p>	<p>SCC (Public Health) notes the Applicant’s position that health and wellbeing monitoring is not required on the basis that no significant effects have been identified. SCC (Public Health) does not agree that the absence of predicted significant effects, provides sufficient justification to negate a monitoring framework. The identification of effects as “not significant” reflects professional judgement at the point of assessment and does not equate to certainty that effects will not arise in practice, particularly for complex determinants of health and wellbeing such as community anxiety, perceived risk, disruption to daily life and cumulative stress associated with prolonged construction activity.</p>	<p><b>[REP1-178]</b> <b>[APP-192]</b></p>

		<p><i>construction is set out in 7.6 Outline Public Rights of Way Management Plan [APP-329].</i></p> <p><i>The Applicant notes this comment. However, there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192].</i></p>	<p>SCC (Public Health) considers that a precautionary approach would recognise the limitations of predictive assessment. Monitoring provides a proportionate mechanism to identify and respond to emerging issues, rather than relying solely on assumptions made at the assessment stage.</p> <p>As noted in [APP-178], whilst embedded and standard mitigation measures are proposed, these do not remove the need for monitoring. Without a means to assess effectiveness, there is no way to demonstrate that mitigation is functioning as intended or to determine whether additional or modified measures are required. Monitoring is therefore integral to mitigation delivery and supports an adaptive management approach.</p> <p>Monitoring also has value beyond identifying significant effects. Given the scale, duration and geographical extent of the Proposed Development, monitoring presents an opportunity to strengthen the evidence base on construction-phase impacts on community health and wellbeing in rural and semi-rural contexts. Proportionate monitoring data can inform not only the management of this project, but also future infrastructure schemes of a similar nature, enabling lessons to be learned and contributing to continued improvement in assessment methodologies and mitigation design across the sector.</p> <p>Furthermore, the absence of monitoring limits transparency and accountability in relation to health</p>	
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			<p>and wellbeing outcomes. Where concerns are raised by communities during construction, the availability of agreed monitoring indicators and reporting arrangements provides an objective basis for dialogue between the Applicant, local authorities and affected communities. This may help to reduce conflict, support trust in the delivery of the project and ensure that emerging issues are addressed before they escalate into more acute impacts.</p> <p>For these reasons, Public Health maintain that the inclusion of proportionate health and wellbeing monitoring remains justified and appropriate, notwithstanding the Applicant’s assessment that no significant effects have been identified.</p> <p>Recommendations at paragraphs 17.80 to 17.85 are therefore reaffirmed, as a reasonable and precautionary measure to ensure that health and wellbeing is effectively protected, mitigation is demonstrably effective, and learning is captured in the context of a major, long duration infrastructure project.</p>	
<p><b>Table 4.16</b> Historic Environment – Responses to new matters and Applicant clarifications</p>				
5.32	Archaeology	<p><b>Table 4.16 (7.28)</b></p> <p><i>The archaeological evaluation work (geophysics and trial trenching) is ongoing, continuing the Applicant's commitment to the historic environment potentially affected the Project. The results of the fieldwork up to the</i></p>	<p>SCCAS acknowledges that the fieldwork completed to date is substantial. However, this is a c. 180 km linear project crossing Norfolk, Suffolk and Essex, with potential impacts along the entire route. Given the scale of the project, a comprehensive programme of</p>	<p>[APP-328] [REP1-178]</p>

		<p><i>end of December 2025 were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information which Suffolk County Council is aware of. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. The Phase 2 stage of the geophysical survey and trial trenching has continued in 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors (LPAAA) for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information Report. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.</i></p>	<p>archaeological evaluation is required to inform determination.</p> <p>SCCAS does not accept the statement that the fieldwork undertaken to date comprises “a more comprehensive approach” than other NSIPs. As a percentage of areas of impact, significantly more archaeological evaluation was achieved by submission on other NSIPs in Suffolk. However, SCCAS do not consider this as a point of argument, SCCAS aim is to ensure that appropriate levels of post-consent archaeological evaluation and mitigation are secured.</p> <p>SCCAS cannot confirm at this stage that the ongoing and post-consent programme of archaeological evaluation is sufficient to determine the application. Approval of an amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] is required before SCCAS can determine whether the evaluation programme is adequate.</p> <p>If the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] cannot be agreed by the close of the examination, SCCAS will advise a requirement to be included in the DCO to secure post-consent approval of the final document and its methodology for assessing and mitigating archaeological impacts (see Chapter 14,</p>	
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			<p>paragraph 14.50 of the Suffolk County Council Local Impact Report <b>[REP1-178]</b>).</p> <p>For Suffolk, the archaeological evaluation programme has been focused on the priority areas, identified by construction priorities, principally the undergrounding sections and compound locations, where the likelihood of encountering archaeological remains that may require preservation <i>in situ</i>, and therefore necessitate design changes would impose constraints on the development, is at its greatest.</p> <p>The overhead sections in Suffolk have not yet been subject to trial trenching. SCCAS expects to continue discussions with the Applicant to agree the scope and timing of archaeological evaluation for those sections focusing on areas of impact once the construction design is formally agreed, both prior to and after consent, and to ensure archaeology is addressed through an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b> and appropriate DCO requirements.</p>	
5.33	Archaeology	<p><b>Table 4.16 (7.38)</b></p> <p>Decommissioning has been scoped out of the assessments as set out in 6.19 Scoping Report <b>[APP-288 - APP-296]</b> and 6.20 Scoping Opinion <b>[APP-297]</b>.</p>	<p>Decommissioning of existing infrastructure, required to facilitate the scheme, may be scoped out of the assessment for determination, but decommissioning impacts must be addressed in an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written</p>	<b>[APP-328]</b>

			Scheme of Investigation <b>[APP-328]</b> which should set out the methodology to assess and mitigate those impacts.	
5.34	Archaeology	<p><b>Table 4.16 (7.42)</b></p> <p>The Applicant will update 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b> during the examination period in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England and will consider any detailed comments provided in Local Impact Reports.</p>	<p>SCCAS have been informed by the Applicant in meetings on 26/03/2026 and 01/04/2026 that an amended version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b> will be sent over to all Local Planning Authority Archaeological Advisors by Late April 2026, for review and comment.</p> <p>It is essential that 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b> meet the necessary standards and is approved by the Local Planning Authority Archaeological Advisors to ensure the interests of the Historic Environment are adequately managed and protected.</p> <p>If the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b> cannot be agreed by the close of the examination, SCCAS will advise a requirement to be included in the DCO to secure post-consent approval of the final document and its methodology for assessing and mitigating archaeological impacts (see Chapter 14, paragraph 14.50 of the Suffolk County Council Local Impact Report <b>[REP1-178]</b>).</p>	<p><b>[APP-328]</b></p> <p><b>[REP1-178]</b></p>
5.35	Archaeology	<p><b>Table 4.16 (7.47)</b></p>	<p>The Historic Environment Records (“<b>HER</b>”) do not represent the full archaeological resource, and</p>	

		<p>6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables <b>[AS-070]</b> is not intended to provide the full detail of mitigation measures, it signposts where a physical impact to archaeology is expected and therefore where archaeological mitigation would be required. The details of mitigation are contained in 7.2 Outline Code of Construction Practice [Revision B], 7.4 Outline Landscape and Ecological Management Plan [Revision C] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b> and secured through the relevant requirements in 3.1 Draft Development Consent Order <b>[APP-056]</b>.</p>	<p>therefore the <b>6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]</b> do not represent the full archaeological resource. The significance, extent and presence of archaeological heritage assets may change following intrusive archaeological evaluation, and additional previously unknown assets may be identified.</p> <p>Intrusive archaeological evaluation by means of trial trenching is required to establish the presence and absence, character, extent, significance and state of preservation of archaeological heritage assets in the sampled area, to understand the impacts of the proposed development on those remains, and to inform a programme of archaeological mitigation.</p> <p>A programme of archaeological evaluation and mitigation will be secured by requirement wording on the DCO and through an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b>.</p>	
5.36	Archaeology	<p><b>Table 4.16 (8.54)</b></p> <p>The term ‘appropriate’ in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be</p>	<p>Vegetation, tree and hedgerow root removal must not be undertaken until the archaeological evaluation has been undertaken and where it is required, the archaeological mitigation must integrate the root removal into the mitigation programme. This is to avoid any unintentional damage to archaeological remains before they have been excavated and recorded.</p>	

		<p>found in Section 9 of 7.4 Outline Landscape and Ecological Management Plan [Revision C]. Specifically, this means:</p> <ul style="list-style-type: none"> <li>i. Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature</li> <li>ii. Design and siting will be informed by local landscape character assessments, historic environment records, and, where relevant, consultation with Local Planning Authorities and heritage specialists</li> <li>iii. Species selection for replanting (e.g. hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible</li> <li>iv. If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained or, where possible, enhanced.</li> </ul>		
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5.37	Archaeology	<p><b>Table 4.16 (Annex A Table 1, comment 1.1)</b></p> <p>Geoarchaeological monitoring of Ground Investigation works at the Stour Valley took place prior to submission and the results of this work, including a deposit model, is included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report <b>[APP-214]</b>. The results revealed a sequence of natural geological layers with no archaeological deposits identified. Provision for further geoarchaeological work is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b>, which will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports. Commitment GH11 in 7.2 Outline Code of Construction Practice [Revision B] secures the requirement for a Hydrogeological Risk Assessment to be undertaken at all trenchless crossing locations, which would include the River Stour crossing.</p>	<p>SCCAS acknowledges the deposit models in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report <b>[APP-214]</b>. However, no assessment on the significance or date of the deposits identified has been undertaken, furthermore the deposit models can be further enhanced to inform mitigation. This can be secured by DCO requirement and suitable provision for geoarchaeological and palaeoenvironmental assessment within an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b>.</p> <p>In addition, Commitment GH11 should be amended to require the hydrological risk to assess the hydrological risk to sensitive archaeological deposits, palaeoenvironmental deposits and finds identified during the post-consent geoarchaeological and palaeoenvironmental assessment. Hydrological risk assessment to sensitive archaeological deposits, palaeoenvironmental deposits and finds must also be included in an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b>.</p>	<p><b>[APP-214]</b></p> <p><b>[APP-328]</b></p>
5.38	Archaeology	<p><b>Table 4.16 (Annex A Table 2, comment 2.1)</b></p>	<p>The 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report <b>[APP-209]</b> does</p>	<p><b>[APP-209]</b></p> <p><b>[APP-328]</b></p>

		<p>6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] has been produced in accordance with industry standard guidance (CIFA (2014) Standard and guidance for historic environment desk-based assessment) and the Applicant considers it to be fit for purpose. Whilst there is no ‘Archaeological Potential’ section within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] the archaeological potential of the Project is considered throughout the baseline narrative, which includes discussion about the nature of the archaeological resource along the route by location and period. This is essential in aiding the understanding of the nature of human activity since the prehistoric period, the evolving nature of settlement and exploitation of the landscape, the way in which past communities have harnessed local resources and consequently the way in which surviving archaeological remains reflect these activities. This methodology is set out in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209].</p>	<p>not explicitly present a discrete archaeological potential assessment that identifies locations where currently unknown archaeological heritage assets are more likely to survive.</p> <p>An assessment of archaeological potential would help to:</p> <ol style="list-style-type: none"> <li>1. identify areas with higher or lower expected densities of, yet unknown, archaeology.</li> <li>2. indicate likely date ranges and character of archaeology.</li> <li>3. highlight areas where preservation is likely to be good or poor due to past and current land use; and</li> <li>4. identify locations where nationally important assets are more likely to occur.</li> </ol> <p>Such information is useful for programming early trial trenching so that mitigation can be integrated into the project timetable to help avoid any unexpected delays to project delivery.</p> <p>SCCAS considers that the absence of an archaeological potential assessment within the 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is a missed opportunity for the project, however, SCCAS believe the appropriate work can be secured by an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] to assess the</p>	
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			archaeological resource across the scheme and inform a programme of archaeological mitigation.	
5.39	Archaeology	<p><b>Table 4.16 (Annex A Table 3 comment 3.1)</b></p> <p>The Applicant has identified this construction laydown area as ‘Area 162 - North of Lion Rd, south-west of Palgrave (west of RG93)’. The site has been subject to geophysical survey with only a field boundary, a pond and ploughing trends identified. Archaeological trial trenching is planned, and a trench array has been designed and will be shared with the archaeological advisor for agreement.</p>	<p>SCCAS would like to highlight that not all archaeology can be detected by magnetometer survey, and the survey does not provide the full archaeological resource, therefore trenching is required on this site. SCCAS has been informed by the Applicant that archaeological trial trenching is programmed for June 2026 during the examination. However, SCCAS would like to highlight that this timing leaves limited opportunity for redesign before the determination of this application, should significant high value archaeological heritage assets be identified.</p> <p>Because this is a temporary construction laydown area, should significant high value archaeology (e.g. burials or other remains of national importance or regional importance) be identified, permanent loss to high value archaeology for a temporary construction impact cannot be justified. SCCAS therefore recommend that the trenching is completed prior to the end of the examination process to allow time for design changes where necessary.</p>	
5.40	Archaeology	<p><b>Table 4.16 (Annex A Table 3, comment 3.2)</b></p> <p>Value has been assigned following the methodology in 6.19 Scoping Report <b>[APP-288 - APP-296]</b>, 6.11.A1 Environmental Statement Appendix 11.1 - Historic</p>	<p><b>SCCAS are not requesting a change to the methodology.</b> We require the applicant to state clearly in their assessment that the heritage assets mapped within the Order Limits do not represent the full archaeological resource, and these recorded assets</p>	<b>[APP-328]</b>

		<p>Environment Baseline Report [APP-209], and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and using relevant guidance and professional judgement. It is not proposed to make changes to the agreed methodology at this stage.</p>	<p>have the potential to increase or decrease in significance following information obtained by intrusive evaluation and that areas beyond the recorded sites may contain as yet unidentified archaeological heritage assets that could be affected by the scheme.</p> <p>Intrusive archaeological evaluation will determine the presence or absence, significance, character, depth, date and state of preservation of archaeological heritage assets within the sampled areas and will inform a programme of archaeological mitigation. The post-consent archaeological programme will be secured by the DCO through Requirement wording and set out in an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p>	
5.41	Archaeology	<p><b>Table 4.16 (Annex A Table 3, comments 3.5/ 3.7/ 3.8/ 3.9/ 3.12/ 3.14/ 3.16/ 3.18/ 3.19/ 3.20/ 3.21/ 3.22/ 3.25)</b></p> <p>Value has been assigned following the methodology outlined in 6.19 Scoping Report [APP-288 – APP-296], 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and using professional judgement. Cropmarks were not taken as conclusive evidence of function and</p>	<p>SCCAS thanks the applicant for acknowledging that the baseline heritage asset values are provisional and may be revised following geophysical survey and trial trenching.</p> <p>SCCAS welcome the recognition in the applicant’s response that mapped assets within the Order Limits do not necessarily represent the full archaeological resource and that value can increase or decrease as a result of further evaluation.</p> <p>The information regarding archaeological heritage assets contained within the 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment</p>	<p>[APP-209] [APP-328]</p>

		<p>date unless particularly persuasive or supported by evaluation/ excavation results or notable concentrations of artefacts. The Applicant is confident in the heritage valuations given in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report <b>[APP-209] but acknowledges that value could be considered higher or lower based on the findings of geophysical survey and intrusive fieldwork. (own emphasis)</b></p>	<p>Baseline Report <b>[APP-209]</b>, is not exhaustive, and areas beyond the recorded assets may contain unidentified archaeological heritage assets. Only through intrusive archaeological fieldwork can the presence or absence, significance, date, depth and state of preservation of archaeological heritage assets be established within the area sampled and the impacts of the project upon archaeological heritage assets be determined and mitigated.</p> <p>The post-consent archaeological programme will be secured by the DCO through Requirement wording and set out in an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b>.</p>	
5.42	Archaeology	<p><b>Table 4.16 (Annex A Table 3, comment 3.9)</b></p> <p>The Applicant thanks the Council for this information but as it was not included in any of the data sources identified in 6.19 Scoping Report <b>[APP-288 – APP-296]</b> and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report <b>[APP-209]</b> at the point of data cut off for the application and is not located within the Order Limits, the Historic Baseline Report will not be edited to include this heritage asset.</p>	<p>The heritage assets recorded as part of the East Anglia One Offshore Wind Farm – NSIP project (HER number BRF 130) are comparable to the medieval heritage assets recorded at Site 7 – Bramford Substation (Document 6.11.A5: Environmental Statement Appendix 11.5 – Trial Trenching Report <b>[AS-078]</b>). Although the Applicant is not proposing an amendment to the Historic Baseline Report, the county Historic Environment Records (“<b>HER</b>”) are continually being updated and an updated HER search for the project will be required to inform the project post-consent.</p> <p>While an updated HER search is not required to determine this application, if consent is granted the</p>	<b>[AS-078]</b>

			Applicant will be required to undertake an updated project wide HER search for the mitigation phase to account for new discoveries and inform the mitigation reporting.	
5.43	Archaeology	<b>Table 4.16 (Annex A Table 3, comment 3.11)</b> The methodology in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] equates the high value attributed to this asset, with national significance.	SCCAS notes this clarification.	
5.44	Archaeology	<b>Table 4.16 (Annex A Table 3, comment 3.23)</b> The Applicant can supply SCCAS with all the cropmarks mapped by the Project in Suffolk in GIS shapefile format.	SCCAS notes this.	
5.45	Archaeology	<b>Table 4.16 (Annex A Table 4, comment 4.2)</b> The Applicant refers SCCAS to paragraph 4.7.2 bullet point 2 in 6.4 Environmental Statement Chapter 4 – Project Description [APP-130] where construction includes pre-commencement operations. The Applicant will not, therefore, make the suggested edit.	SCCAS notes the cross reference to paragraph 4.7.2 bullet point 2 in 6.4 Environmental Statement Chapter 4 – Project Description [APP-130], however, for clarity and consistency within the Historic Environment Assessment Tables it should be amended to clarify that the definition of construction includes pre-commencement works.	
5.46	Archaeology	<b>Table 4.16 (Annex A Table 4, comment 4.4)</b> The use of the term ‘if required’ reflects the potential for an asset to be within the Order Limits but not located within an area of	The term “if required” has a broad meaning. We accept the Applicant’s explanation that it may be used where an asset lies within the Order Limits but outside the area of physical impact, or where the asset’s low	

		<p>physical impact. Also, it may reflect the low value of the asset e.g. a post-medieval/modern field boundary recorded on 20th century OS mapping. The use of ‘if required’ reflects the Applicant’s intention to consider the requirement for mitigation on a case-by-case basis across the Order Limits.</p>	<p>heritage value (for example a post-medieval/modern field boundary shown only on 20th century OS mapping) means mitigation is unlikely to be necessary.</p> <p>The reason why this is important to define what is “if required” as, without definition, what is required may allow inconsistent interpretation at the implementation stage which could lead to disputes over whether proposals fulfil the DCO.</p>	
5.47	Archaeology	<p><b>Table 4.16 (Annex A Table 4, comment 4.6)</b></p> <p>Value has been assigned following the methodology outlined in 6.19 Scoping Report [APP-288 – APP-296], 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], and 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and using professional judgement. Cropmarks were not taken as conclusive evidence of function and date unless particularly persuasive or supported by evaluation/ excavation results or notable concentrations of artefacts. The Applicant is confident in the heritage valuations given in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] but acknowledges that value could be considered higher or lower based on the</p>	<p>SCCAS acknowledges that asset 2009 is recorded as a possible long barrow and that the Applicant considers the HER polygon to be unaffected by the proposed primary access route.</p> <p>However, a possible long barrow is an indicator of wider funerary activity and therefore highlights the possibility of associated and related archaeological heritage assets in the wider area that could be affected by the project but have yet to be identified.</p>	

		<p>findings of geophysical and intrusive fieldwork. In the case of asset 2009, the HER record describes it as a ‘possible long barrow’ and with no further corroborative evidence the Applicant considers the reported value to be acceptable. Furthermore, and to address SCCAS concerns regarding evaluation and mitigation, the supplied HER polygon straddles the existing Bullen Lane, and Bullen Lane is located within the Order Limits as primary access route. The primary access route in the location of the HER poly will not result in any physical impacts, therefore, neither evaluation nor mitigation is required.</p>		
<p><b>Table 4.20</b> Landscape and Visual – Responses to New Matters and Applicant Clarifications</p>				
5.48	Landscape and Visual	<p><b>Table 4.20 (13.166, 13.186 and 13. 187)</b>  <i>The final Landscape and Ecological Management Plan will be agreed with the relevant LPAs. 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] states ‘The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the</i></p>	<p>The Applicant’s response does not resolve the query. The wording quoted from the OLEMP [APP-323] is what SCC (Landscape) refers to and should be changed to require the agreement/approval of the relevant local planning authority also. The agreement of the final LEMP is not sufficient to secure these points without the wording being changed.</p>	

		<i>relevant landowners on a case-by-case basis.'</i>		
5.49	Landscape and Visual	<p><b>Table 4.20 (13.16)</b></p> <p><i>The ES assesses the effects of the Project as shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. Flexibility within the LoD has been considered for landscape and visual effects in Section 13.9 Sensitivity Testing of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. This concluded that overall, there would be no change to the significance of effects on landscape character or visual receptors, set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] and 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232], as a result of changes to the Project within LoDs. At Viewpoints 4.37 and 8.12 the level of effect could increase as a result of changes to the LoD, however there would be no change to the significance of effect (Table 13.8 of 6.13 Environmental Statement Chapter 13 -</i></p>	<p>SCC (Landscape) remains concerned with regards to LoD in the vicinity of residential properties, and cultural heritage assets both above and below ground, and considers that in such locations, where adverse effects could be made worse, any re-location of the pylon towers is to be agreed with the relevant local planning authority and English Heritage, if applicable.</p>	

		<p><i>Landscape and Visual [APP-226]). This included consideration of lateral and longitudinal movement of pylons. Flexibility within the LoD has also been considered in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]. Worst-case scenarios, whereby a proposed pylon and/or overhead line could be re-positioned to a location within the LoD where they would have the greatest visual impact upon a property (which predominantly, but not always, would be the closest point to it), were assessed. It should be noted, however, that it would be the outer limits of the conductors' swing that may possibly be re-located to the edge of the LoD, and subsequently, not the pylons themselves.</i></p>		
5.50	Landscape and Visual	<p><b>Table 4.20 (13.93)</b>  <i>The approach to making judgements on the value of landscape receptors is set out in paragraphs 13.4.25 to Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. Value judgements were informed by the Landscape Institute's Technical Guidance Note (TGN) 02/21 Assessing Landscape Value Outside National</i></p>	<p>SCC (Landscape) disagrees with the Applicant's assessment and considers that, at least in part, the landscapes the scheme traverses have been undervalued. Detailed comments have been provided in the LIR [REP1-178].</p>	

		<p><i>Designations. This defines landscape value as ‘the relative value or importance attached to different landscapes by society on account of their landscape qualities’ (page 3). Criteria for assessing landscape value are set out in Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. The following criteria (or factors) are considered when making judgements of landscape value:</i></p> <ul style="list-style-type: none"> <li><i>i. Natural heritage</i></li> <li><i>ii. Cultural heritage</i></li> <li><i>iii. Landscape condition</i></li> <li><i>iv. Associations</i></li> <li><i>v. Distinctiveness</i></li> <li><i>vi. Recreational</i></li> <li><i>vii. Perceptual (scenic)</i></li> <li><i>viii. Perceptual (tranquillity)</i></li> <li><i>ix. Functional value.</i></li> </ul> <p><i>Judgements on landscape value are clearly presented in Tables A1 to A55 within Annex A Landscape Value Assessment of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]. The Applicant is confident the</i></p>		
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5.51	Landscape and Visual	<p><b>Table 4.20 (13.194 - 13.197)</b></p> <p><i>The landscape design for the Environmental Area at Wenham Grove CSE compound is indicative at this stage and will be developed further at detailed design stage. The Applicant has produced the indicative design taking on board previous rounds of comments made by the Local Planning Authorities during and following thematic meetings. These further detailed points are welcomed and will be addressed in drafting construction stage planting plans to fulfil the DCO Requirements. The detail of construction stage planting plans (species, locations, sizes and specification) for the Environmental Area is to be provided in the final LEMP in accordance with Requirement 4 of 3.1 Draft Development Consent Order [APP-056]. The final LEMP will be approved by the Local Planning Authorities. Details of on-site tree planting elsewhere will be provided in accordance with the</i></p>	<p>SCC (Landscape) considers that it would be helpful to progress the indicative landscape design for the Wenham Grove Cable Sealing End compound and consider including continuous and wider planting and other suggestions made by SCC prior to consent, as post consent the detailed design will need to accord with the design consented as part of the DCO.</p>	

		<i>Reinstatement Planting Plan secured under Requirement 9 of 3.1 Draft Development Consent Order [APP-056].</i>		
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