NORWICH TO TILBURY

EN020027

Answers to Examining Authority Questions Round 2

Suffolk County Council [redacted]

Babergh District Council [redacted]

Mid Suffolk District Council [redacted]

Deadline 5

10 June 2026

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Glossary of Acronyms

AIL	*Abnormal Indivisible Load*
CNP	*Critical National Priority (Infrastructure)*
DCO	*Development Consent Order*
DESNZ	*Department of Energy Security and Net Zero*
DOR	*Discharge of Requirement*
ES	*Environmental Statement*
HGV	*Heavy Goods Vehicle*
LIR	*Local Impact Report*
NSIP	*Nationally Significant Infrastructure Project*
PPA	*Planning Performance Agreement*
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, Babergh District Council, and Mid Suffolk District Council to answer to the Examining Authority's Second Round of Written Questions ("**ExQ2**"). The response format is based on the template provided by the Planning Inspectorate case team. For ease of reference, questions which are not addressed to Suffolk County Council, Babergh District Council, and Mid Suffolk District Council have been deleted (save for rare exceptions, where the Local Authorities have opted to answer although not requested). Where another Local Authority is the lead authority, this has been attributed. Examination Library references are used throughout to assist readers.

Answers to Examining Authority's Second Round of Written Questions (ExQ2)

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
1 GEN General and cross-topic questions			
GEN 2.1	The applicant All interested parties	**Final deadlines and statements of common ground (SoCG)** The scale of the proposed development and volume of documentation submitted into the examination by all parties is considerable. The applicant and all interested parties (IPs) are reminded of the four remaining deadlines in the examination timetable and are referred to the Rule 8 letter dated 17 February 2026 [PD-011] which sets out what the ExA expects to receive at each deadline. deadline 5: 10 June (the additional deadline 5A on 17 June is limited to certain responses only) deadline 6: 7 July deadline 7: 21 July deadline 8: 4 August All parties are reminded that there is no need to resubmit comments which have already been made in earlier deadlines. If an IP continues to be dissatisfied with the unchanged response from the applicant, they should set out clearly those points in summary form in their final comments at deadline 7; there is no requirement to respond at	SCC (Planning) and BMSDC note this request and intend to submit representations throughout the remaining deadlines and will provide its updates to the Applicant for inclusion in the Statement of Common Ground.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		every deadline unless new information has arisen which they wish to comment on. Cross-reference should be made to the examination library references where possible in all submissions. The ExA also reminds all parties of the importance of setting out matters which the parties agree on, and which they continue to disagree on. This can be set out in SoCGs or written summaries at the final deadline 8 (by 4 August 2026). The ExA expects SoCGs to be signed by both parties involved in each SoCG and urges the relevant IPs to engage in these so that their comments are accurately reflected within the documents.	
GEN 2.2	The applicant All local authorities	**Legal Agreements** Further to first written question (ExQ1) GEN 1.21, the applicant provided a table (appendix E [REP3-074]) outlining the legal agreements requested to date by local authorities and setting out its comments, including on whether (or not) such an agreement would meet the relevant tests. All local authorities are invited to provide: further comments on appendix E [REP3-074], or if already done this, to signpost to the ExA where in the examination library your comments on such matters can be found. In particular, the ExA seeks comments from the local authorities on how they consider each of its requests would meet the relevant policy tests (including regulation 122 of the Community Infrastructure Levy Regulations	SCC outlined its expectations of legal agreement in answer to ExQ1 GEN1.21 **[REP3-086]**. BMSDC support the below. In brief, the requests are: i. Biodiversity Net Gain ii. Tree Replacement Planting Programme iii. National Landscape Duty (section 85) iv. Location-specific Compensatory Measures (including the Suffolk Locations identified below) a. Waveney Valley b. Gipping Valley c. Bramford and Burstall v. Abnormal Indivisible Loads vi. Workforce Skills Training

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		2010). The applicant is asked to provide: an update to the table of the requests a summary of any ongoing agreements with local authorities which are being progressed, with expected time periods for completion an update to the document 'Consents and licences required under other legislation' as necessary to include such other forms of agreement updates to SoCG with local authorities as necessary to reflect agreement or non-agreement on the need for such agreements	SCC proposes that these requests should form a bilateral or multi-party S106 agreement or S111 agreement, or other such hybrid agreement known as a Deed of Obligation. The Council understands that the Applicant's position, as set out in Appendix E of **[REP3-074]**, is that the commitments for Biodiversity Net Gain and the 3:1 Tree Replacement Planting Programme should be secured by Unilateral Undertakings ("**UU**") because of the number of parties involved. SCC considers that this approach is unreasonable and ineffective. The Council has concerns that UUs will not secure mutual obligations for the Local Authorities, nor does the Council agree with the Applicant's rationale. SCC considers that there can be a mechanism within such an agreement that specifies that only the Local Authority(ies) whose administrative area covers the land is affected should approve Biodiversity Net Gain measures. With regard to the Tree Replacement Planting Programme, SCC considers that a multi-party agreement would reduce the administrative burden on the Local Authorities (with all schedules captured in one agreement) and allow the Applicant to have the power to ensure that the funds were directed to the intended purpose(s). Therefore, SCC considers that a UU for these schedules would not sufficiently secure the relevant obligations and therefore proposes that all requested schedules should be captured in one multi-party S106/S111 legal agreement. The Council considers that paragraph 4.1.18 of EN-1 sets out the relevant policy tests, building on section 122(2) of the Community Infrastructure Levy Regulations 2010 and

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			at paragraph 58 of the National Planning Policy Framework, as below: • relevant to planning; • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development; • reasonable in all other respects. Concerning the BNG schedule, SCC understands that the Applicant has voluntarily proposed this schedule. EN-1 paragraph 4.6.6 states *"Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible"*. This has been proposed as a Unilateral Undertaking; however, the Host Authorities believe that this should be a multi-party agreement and that approval should be sought and that mechanisms could be introduced in the agreement to avoid over-complication regarding decision-making. Recognising that BNG is not (as yet) a mandatory legal requirement for NSIPs to deliver (but is currently a matter for policy as above and so relevant to planning), the Council considers that 10% BNG should be sought if achievable to (a) meet the expectations of policy in paragraph 4.4.6 of EN-1 (thereby necessary to make the development acceptable in planning terms), (b) compensate for the adverse impacts experienced on the environment as a direct result

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			of the construction of the proposed development (thereby directly related). The metric of 10% BNG is an established precedent for projects of equal and lesser scale (thereby related in scale and kind). SCC notes that BNG has been delivered by different routes in recent made energy DCOs, including via a multiparty legal agreement in Yorkshire Green grid upgrade (2024) between NGET and three separate local authorities, and via DCO requirements in Bramford to Twinstead grid upgrade (2024), Five Estuaries OWF (2025), and North Falls OWF (2026). SCC understands that there may be practical difficulties with use of a DCO requirement if some BNG provision is to be offsite and outside of the Order limits. Both DCO requirements and planning obligations in legal agreements have to be relevant to planning, necessary to make a development acceptable in planning terms, and reasonable in all other respects, if they are to be taken into account by the Secretary of State, and it can be reasonably concluded that the Secretary of State was satisfied that these tests were met for BNG provision in the cases of those other energy projects. Whilst each case turns on its own facts, SCC is clear that the tests are met for 10% BNG provision to be required in the case of this project. The Tree Replacement Planting Programme has been proposed by the Applicant to replace any trees removed at a 3:1 ratio. The Council considers that vegetation removal and tree loss should follow the Mitigation Hierarchy, as identified in EN-1 (avoid, mitigate, compensate). SCC deems that the tree replacement planting programme represents compensatory measures (thereby necessary).

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			As this schedule relates to replacing trees lost which must be removed if the proposed development is progressed, the Council considers this directly related to the proposed development (thereby directly related). The Council does not yet know how many trees will be removed and therefore any costing is subject to this confirmation, however, SCC supports the 3:1 proposal as put forward by the Applicant (thereby related in scale and kind). The National Landscape Duty as section 85 of the Countryside and Rights of Way Act 2000 (as amended) dictates is the requirement to "seek to further the purpose" of the Area of Outstanding Natural Beauty ("**AONB**"). As the project will unavoidably traverse through the Dedham Vale AONB, and the proposed undergrounding reduces but does not remove all adverse impacts (and imposes its own further impacts, especially as regards vegetation clearance, Link Pillars, and Cable Sealing End compounds), the Council considers that this compensation is required (thereby necessary and directly related). The Council has proposed a cost schedule based on the Management Plan of the National Landscape (thereby related in scale and kind), for which the Applicant has accepted as an approach. SCC considers that the Applicant should commit to sign legal agreement(s) in regard to location-specific compensatory measures including the Suffolk locations identified, i.e. the Waveney Valley (for landscape and visual amenity compensation) and Bramford/Burstall and Gipping Valley (for strategic landscaping and biodiversity connectivity improvements). The Council considers that

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			these sensitive locations have experienced significant adverse in-combination and/or cumulative effects and that compensation is the next step of the Mitigation Hierarchy to explore (thereby necessary and directly related). SCC does not agree with the Applicant's interpretation of what was concluded by the ExA in the Bramford to Twinstead ExA Report. SCC set out its position in its remarks on 'compensation' in section 8.2 of its Post Hearing Submissions following ISH2 **[REP4-336]** to which reference should be made. NB there is a minor typo in the fifth paragraph of that text in that 'preferable' should be 'referable', and in the quotation from paragraph 3.9.197 of the Bramford to Twinstead ExA Report the words '**in this case**' should have been highlighted in bold. SCC notes that the Applicant has repeated its misinterpretation of the SCC position in its comments on item 8.2e in **[REP4-302]** and SCC responds to the Applicant's further comments in its response to LV 2.16 (below). Notwithstanding this disagreement, the Council has been engaging with the Applicant to justify its requests and explain the potential opportunities as the Council perceives them. The Council has provided the Applicant with a written CIL Justification Statement for the request for Waveney Valley Landscape and Visual Amenity improvements and provided information regarding the request for Bramford and Burstall Strategic Landscaping. SCC therefore awaits further dialogue with the Applicant to finalise proposals (thereby in scale and kind). Suffolk County Council understands that the Applicant will be

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			submitting at Deadline 5, in answer to ExQ2 LV 1.28, constraints and opportunities plans for these proposed locations. Whilst SCC understands that the Applicant maintains the position that these measures are not necessary (a view not shared by SCC), SCC and the Applicant are agreed on the principle of the approach (as identified on the opportunity plans). The Council understands that the Applicant is seeking to agree resourcing for police escorts for Abnormal Indivisible Loads, however, the Council seeks to ensure that obligations such as to undertake Structural Surveys on proposed routes are secured (thereby necessary and directly related). This matter does not requirement financial compensation, rather protection for the Local Highway Authority (thereby related in scale and kind). SCC and BMSDC have outlined in their Joint LIR **[REP1-178],** paragraphs 10.87 and 10.88, that a Section 111 legal agreement should be entered into that would provide workforce skills training. The proposed development will negatively impact upon the workforce availability to regional businesses and supply chains due to workforce displacement and churn (Table Item 8f of **[REP1-178]**), therefore, the Mitigation Hierarchy should be considered (thereby necessary and directly related). The Councils therefore propose that Applicant enters into such an agreement to commit to a structured investment in skills and training infrastructure with proportionate contributions to skills development (thereby related in scale and kind) to mitigate and compensation for these impacts. In the case of Suffolk, this could integrate with

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			regional initiatives and training facilities and align with the Suffolk Regional Skills Coordination Function ("**RSCF**") to realise benefits via synergies.
GEN 2.4	The applicant All local authorities All IPs listed within the Report on interrelationship with other infrastructure projects	**Report on interrelationship with other infrastructure projects** The ExA notes that the latest cut-off date for other existing and approved developments in the cumulative assessment is currently 31 January 2026 (Environmental Statement (ES) Chapter 17 - Cumulative Effects - Response Update [REP4-163], see also question GEN 2.5 below). However, the final version of the interrelationship report [REP4-296] should include, as far as possible, the most up-to-date position relating to the progress of other approved and pending development proposals in a summary 'at a glance' document. The applicant is asked to: • ensure its final interrelationship report to be submitted at deadline 7 is consistent with ES chapter 17 and [REP4-163] • include an indication of the location of Tasway Energy Park (DCO 17) in table 2.1 of the next version of the report (the ExA notes that this proposal is not included in the plans due to the infancy of its design development) and, if available, an indication of its submission date to the Planning Inspectorate.	Having regard to the judgement in Pearce v Secretary of State for Business, Energy and Industrial Strategy and Norfolk Vanguard Ltd as interested party, BMSDC and SCC refer to the Brunfort 1.5GW BESS development, currently at EIA scoping stage as being reasonably foreseeable, as a customer of National Grid with a valid connection offer for Bramford substation, for consideration in the assessment of cumulative effects (BMSDC references DC/26/01910 and DC/26/01983).

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		All local authorities, and IPs who are listed in the interrelationship report, are asked to: • Review the interrelationship report [REP4-296] and confirm if the updated position on approved and proposed developments is, to the best of your knowledge, accurate and to provide any further comments if you wish.	
2 DES Design, parameters and other details of the proposed development			
DES 2.5	The applicant All local authorities	**Approach to scenarios** The ExA notes the updates to the progress of a number of alternative design scenarios as noted in [REP4-310], and that a number of revised plans and documents are expected to be submitted at deadline 5, however it remains unclear when a number of the other alternative scenarios are likely to be confirmed for a number of reasons, including the progress of third party planning applications. • The applicant is asked to ensure that by deadline 7 those outstanding alternative scenarios which remain are fully reasoned and timescales given wherever possible for such matters to be resolved. The local authorities are asked to review the Approach to Scenarios document [REP4-310],	SCC (Planning) and BMSDC note that there are none in Section B and three in Section C that relate to Suffolk. In each of these, the decision has been to retain flexibility into delivery. SCC and BMSDC recognise the current status of these and awaits further engagement.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		clarify their understanding of the scenarios which are reliant on third party planning applications, and to make other comments on the document where relevant to their area.	
3 BIO Biodiversity, ecology and natural environment			
BIO 2.1	The applicant All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust	**Assessment of biodiversity deficit** In response to ExQ1 BIO 1.4 the applicant has stated that replacement planting and habitat creation is identified as embedded/ standard mitigation within the outline Landscape and Ecological Management Plan (outline LEMP). The applicant considers that with this in place there would be no 'biodiversity deficit'. **To applicant:** However, the ExA notes that as indicated in image 4.1 of ES Chapter 4 [APP-130] the overall construction programme, for example, for the Dedham Vale National Landscape the enabling works through to the initial energisation would take almost 4 years. Using this as an example and noting that up to a 120 metre (m) swathe of vegetation would need to be removed for the proposed underground cabling (and with a further 50m either side being "potentially affected") set out the worst-case scenario in time period from vegetation being removed to when you consider the replanted vegetation would reach a similar degree of maturity. Also, the	SCC (Ecology) and BMSDC believe that the likely biodiversity deficit has been sufficiently and reasonably assessed and mitigated within the ES. It will be essential, however, that in the execution of the mitigation and reinstatement of habitats, these are done in a timely fashion. The shorter the period of time where habitats are removed, or otherwise compromised, the less the likely impact upon ecological populations and the faster their recovery to pre-impact levels would likely be. In order to ensure that no temporary works would cause long term significant population impacts, the onus will be on the correct use of: i. pre-commencement ecological surveys to provide current understanding of habitats and populations; ii. appropriate implementation of construction works designed to minimise impacts e.g. appropriate soil storage; iii. appropriate implementation and provision of mitigation measures e.g. provision of temporary flyways for bats for the entire required period i.e. from

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		applicant is requested to further explain its statement in response to BIO 1.4 that ES Chapter 8 [AS- 026] has taken into account any short term temporary effects on ecological receptors – explain this with worked through examples, such as for hedgerow species and also for bats, to demonstrate how impacts on biodiversity have been assessed for this intervening period. **To all local authorities and Wildlife Trusts:** Set out your views on the potential for there to be biodiversity deficit and whether you consider this has been properly assessed in ES Chapter 8 and mitigated for by the applicant. Explain any outstanding concerns and what (if any) additional measures you would wish to see the applicant implement.	removal of habitat until the replacement habitat can provide the requisite ecological functionality; and iv. reinstatement measures being implemented at the earliest possible opportunity i.e. as soon as works are complete, not when the entire project is complete. The outline detail within the Outline COCP and LEMP indicate that suitable measures will be applied to meet the stated assessment that no biodiversity deficit would occur in the long term. In order to ensure that this is the case, the detailed proposals for the mitigation and enhancement of temporary habitat impacts will need to be scrutinised and agreed by the ECoW team and reported to the Ecology Working Group prior to commencement of works likely to cause any such impacts, as well as during their implementation.
BIO 2.8	All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust	**Monitoring the effects on birds** In response to ExQ1 BIO 1.13 regarding the use of bird diverters the applicant in [REP3-074] states that ES Chapter 8 [AS-026] and the Habitat Regulations Assessment (HRA) Report [APP-082] predict no significant adverse effects on birds during operation of the proposed development either with	SCC (Ecology) and BMSDC believe that the use of bird diverters as a precautionary approach to prevent future bird strikes is a positive measure allowing for future changes in avian populations in the Waveney valley area. The WALOR project has aims to improve the habitats of the area in such a way that in the future a greater number of bird species with potential to collide with power lines may occur and/or pass through the location of the route. The importance of these populations and/or the protection the populations will have cannot be speculated on at this time. The best approach to ensure that future collision risk is not a significant impact on bird populations during the operational phase, is to perform periodical reviews through

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			the operational phase by the ECoW and Ecology Working Group based on information regarding population observations at the time of the review. Once this information has been assessed and discussions have taken place, recommendations for the necessity to alter collision risk mitigation, or not, can be made at that time. The Councils believe that the first such review should be undertaken by the Ecology Working Group, 5 years from commencement of construction works.
4 DCO Draft Development Consent Order			
DCO 2.G2	All local authorities	**DCO General 2** In light of the applicant's response to ExQ1 [REP3-074], question SET 1.5, and the Secretary of State's decision letter for The North Falls Offshore Wind Farm Project dated 14 May 2026, especially paragraphs 4.192 to 4.194 (inclusive), do you have any further comment in regard to the use of the term "where practicable" or any variant of that term.	SCC notes the point raised originally by the Essex authorities and supports their position. SCC and BMSDC have considered the relevant paragraphs of the North Falls decision letter and considers the analysis regarding "where practicable" is relevant to the circumstances in that decision letter and is not drafted in such a way to suggest it is intended to bind all future instances where an applicant seeks to include such language in control documents.
Articles			
DCO 2.A4	Babergh and Mid Suffolk District Councils	**Articles 48** During ISH2 (Day 1, Part 4) [EV9-007] Babergh and Mid Suffolk DCs indicated they have concerns in relation to Article 48 (Defence to proceedings in respect of statutory nuisance), but would be	BMSDC did not make a D4 submission on this matter. The DCO suggests that the applicant should not be subject to actions in respect of statutory nuisance. Control and mitigation measures in respect of noise, vibration, dust and light can reduce the *likelihood* of a statutory nuisance however, they may not completely exclude the possibility

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		making those in writing at deadline 4. Please direct the ExA to where within your deadline 4 submissions you have raised these concerns or submit your concerns in response to this question.	of action being taken under the provisions of the Environmental Protection Act 1990. It is therefore not accepted that there should be a defence against proceedings in respect of statutory nuisance as, if all measures and controls suggested by the applicant are in place, there should be no reason to be exempt from investigation and potential statutory nuisance action.
Schedules			
DCO 2.S3	The applicant All local authorities	**Schedules 3, Requirement 4 (Construction Management Plans) 1** Complaints procedure under the Outline CoCP secured by Requirement 4 Thurrock Council in its deadline 4 submission [REP4-339], as well as a number of other County/ Local Authorities raises concerns in regard to the complaints management process. It considers the current complaints management process, as detailed in the updated outline CoCP [REP3-025] to be "…too basic." It highlights that although it includes contact details and requires complaints to be logged, it is lacking in significant areas. These include, but are not limited to defined response times; defined escalation procedures, requirements related to ongoing communication with complainants; identifying persons/parties with clear responsibility for resolving issues; and	SCC (Highways) would expect the Applicant to follow the established complaints process. Whilst SCC acknowledges that there are differences between NG and the LHA, the Council have included a link below to SCC's process for the ExA's consideration. https://www.suffolk.gov.uk/asset-library/corporate-comments-compliments-and-complaints-policy.pdf SCC (Highways) would strongly recommend the Applicant's complaints procedure is submitted to the planning inspectorate for consideration by the Secretary of State.

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		transparency through shared recording with the local authorities. The ExA requests: i) the applicant addresses these concerns raised and updates the complaints management process by incorporating them into a revised/updated complaints management process. ii) The local authorities are to provide draft wording for a complaints management process it/they would be satisfied with.	
DCO 2.S6	The applicant All local authorities	**Schedules 3, Requirement 4 (Construction Management Plan) 4** Noise and Vibration Thurrock Council in its deadline 4 submission [REP4-347], along with other County/ Local Authorities, raises concerns in regard to the applicant's approach to noise and vibration monitoring, alleging it is not sufficiently developed and there is no clear or structured strategy for dealing with such matters. The Council highlights: there is no commitment to routine monitoring: no use of simple baseline checks like listening tests; no clear triggers for more detailed monitoring; and no defined	Since this point was raised originally by Thurrock Council, SCC and BMSDC will defer to them on this point, with a view to making any comments at the next Deadline if it considers further comments would be helpful.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		thresholds for action or reporting requirements. The ExA requests the applicant to address these concerns raised and updates the outline CoCP to set out a clear and structured strategy regarding noise and vibration monitoring and complaints procedure. Local authorities are asked to collaborate and provide and agreed draft wording for the outline CoCP to set out a clear and structured strategy regarding noise and vibration monitoring and complaints procedure.	
DCO 2.S10	The applicant All local authorities	**Schedules 3, Requirement 7 (Construction Hours)** The local authorities are maintaining their concerns in regard to this requirement, especially in terms of the core working hours of 07:00–19:00 on weekdays and 07:00–17:00 on saturdays, sundays and bank holidays, together with additional start-up and close-down activities outside these hours. The ExA notes the applicant's extensive response to ExQ1 [REP3-074] at question DCO 1.S10, especially at pages 210 and 211, where it states in relation to just removing sundays or bank holidays/ other public holidays "Should these scenarios be modelled, it is anticipated that the energisation date on the baseline construction programme would remain largely unchanged."	**Background** SCC (Public Health) maintains its position, as stated in Table Item 1.2 of SCC's Comments on Submission received at Deadline 3 **[REP4-335]** that the construction working hours proposed by the Applicant, are not appropriate to safeguard public health. These hours would expose communities to prolonged and continuous exposure to noise, vibration, construction traffic and general disturbance, with limited opportunity for predictable respite. SCC (PROW) considers that prolonged construction hours will give no respite to PROW users, from the noise, flashing lights and movements from construction vehicles. This includes works on and adjacent to the PROW. This is especially pertinent to horse riders on bridleways. Many PROW are used or health and wellbeing, as well as

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		The ExA has noted all the justifications put forward by the applicant, as well as the applicant's final sentence in this question where it states "...removal of sundays and/or bank holidays and public holidays from the core working hours would not represent a neutral change; rather, it would reduce flexibility and introduce unnecessary risk on the timely delivery of the project." The applicant is asked to model the scenarios of removing: just Sundays just bank and other public holidays sundays and bank and other public holidays and then confirm whether the energisation date on the baseline construction programme would remain largely unchanged in relation to each of those scenarios. The ExA asks the local authorities to collaborate and provide a single form of wording for this requirement that they consider to be a reasonable compromise that collectively satisfies the concerns being raised in regard to this requirement, so this can assist in informing a discussion at ISH3 into the draft DCO. The wording submitted should include, but not be limited to, the core construction hours specified, start and close down activities and the operations that may take place outside of those core working	recreation, and used by visitors to the area contributing to tourism. The prolonged hours on Sundays and Bank Holidays may mean PROW may change their routes and/or habits, which will be detrimental to them. No mitigation has been put forward to address this. From a public health perspective, the provision of regular and predictable periods of respite is essential to protect mental wellbeing, sleep quality and overall quality of life. SCC maintain that extended daily working periods proposed by the Applicant, together with weekend and Bank Holiday working, are likely to contribute to heightened stress, anxiety and a reduced sense of control for affected communities. These effects are likely to be felt most acutely by vulnerable groups, including older people, disabled residents and those without access to private transport, and risk exacerbating existing health inequalities. SCC further emphasises that these concerns must be considered in the context of cumulative impacts. Suffolk is experiencing and is expected to continue to experience a high concentration of NSIPs. The potential for overlapping construction activity and sequential disruption across multiple schemes materially increases the likelihood of sustained adverse effects on community wellbeing. The establishment of appropriately restricted construction working hours is a critical mitigation measure, not only for

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		hours.	this project but also in setting an appropriate and consistent approach for future infrastructure development in the county. **<u>Proposed requirement</u>** Notwithstanding the above, SCC and BMSDC recognise the Examining Authority's request for local authorities to seek a reasonable compromise position. Whilst it has not been possible to attain a cross-local authority position ahead of ExQ2 deadline submission, SCC and BMSDC are willing to engage constructively with other host authorities on the matter, with a view to securing meaningful protection for community health and wellbeing. In particular, the Councils considers that any compromise must retain clear limits on weekend and Bank Holiday working. Notwithstanding the above, the Councils are aware of the draft requirement that Essex County Council intends to propose and SCC and BMSDC confirm it would be content for ECC's drafting (which is similar to that proposed by SCC and BMSDC in the Joint LIR **[REP1-178]** at paragraphs 14.58 to 14.68) to be incorporated into the DCO. For completeness, the requirement, as drafted by ECC, is set out below - ***Construction hours***

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			(1) Subject to sub-paragraphs (2) - (5) work may only take place between the hours of 07.00 and 19.00 Monday to Friday and 08.00 and 13.00 on Saturdays, and may not occur on Sundays, bank holidays and other public holidays (the core working hours), unless otherwise approved by the relevant planning authority *(2) No piling operations may take place outside of the hours of 08:00 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturday with no piling operations taking place on Sunday and Bank Holidays.* *(3) Subject to sub-paragraph (5), unless otherwise agreed with the local highway authority, no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 0800 to 1300 on Saturdays.* *(4) The following operations may take place outside the core working hours—* *(a) trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses;* *(b) the installation and removal of conductors, pilot wires and associated protective netting across highways, railway lines or watercourses;* *(c) the jointing of underground cables excluding cable cutting;*

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			(d) the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused; *(e) any highway works requested by the highway authority to be undertaken on a Saturday or Sunday or outside the core working hours;* *(f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities;* *(g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities that the undertaker and its contractor agree forms the critical path for the accepted construction programme. In such cases, the undertaker must, as soon as practicable, notify the relevant planning authority of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1);* *(h) activity necessary in the instance of an emergency where there is a risk to persons or property;* *(i) security monitoring;* *(j) non-intrusive surveys;*

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			(k) intrusive surveys; *(l) oil processing of transformers or reactors in substation sites;* *(m) delivery to the transmission works of abnormal loads and any highway works requested by the highway authority to be undertaken outside the core working hours; and* *(n) mechanical and electrical installation works within buildings once erected and enclosed* *(5) Works outside core working hours are subject to a 50dBA noise limit will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours.* *(6) The core working hours exclude:* *(a) start up and close down activities up to 1 hour either side of the core working hours* *(b) administrative and clerical activities up to 1 hours either side of the core working hours.* *(7) The severe weather conditions referred to in sub-paragraph 3(g) means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site*

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			access or otherwise) or being contrary to safe working practices. *(8) In this requirement, "start-up and close down activities" means general works that will not create an audible disturbance to local residents including but not restricted to—* *(a) arrival and departure of workforce and staff at site and movement to and from places of work;* *(b) general refuelling of plant;* *(c) site inspections and safety checks;* *(d) site meetings inspections and walkovers;* *(e) site clean-up (site housekeeping that does not require the use of plant);* *(f) general site maintenance; and* *(g) low key maintenance and safety checking of plant and machinery.*
DCO 2.S11	All local authorities	**Schedule 3 – Requirements 8 (Retention and removal of trees, woodland and hedgerows)** The ExA asked in ExQ1 DCO 1.S12 [PD-014] why arboricultural protection measures, such as arboricultural method statements, tree protection plans and root protection areas are not clearly defined and being secured prior to construction as part of this requirement.	SCC (Landscape) and BMSDC are broadly content that paragraph 7.1.2 of the outline LEMP sufficiently secures not only the provision of an Arboricultural Method Statement ("**AMS**") and Tree Protection Plan ("**TPP**"), but also that these must be agreed with the relevant LPA. There is however concern with regards to the timing and logical placement.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		The applicant responded [REP3-074] "…The submission of an Arboricultural Method Statement is secured through the outline LEMP and requirement 4 of the draft DCO. The outline LEMP states 'All construction elements likely to impact on retained trees will be addressed within an Arboricultural Method Statement to be produced following detailed design and agreed with the relevant Local Planning Authorities prior to construction activity commencing. The Arboricultural Method Statement will include protection measures including tree protection fencing, as discussed in Section 7.3. and illustrated in a Tree Protection Plan'. Therefore, whilst the Arboricultural Method Statement is not secured through requirement 8, it is secured through requirement 4 and full details will be provided within the final LEMP(s) prior to the stage of works commencing.". The ExA seeks comments from the local authorities on the applicant's reply or, if you have already responded to this matter, signpost where you have provided a response on this matter.	Ideally detailed and complete Tree and Hedgerow Surveys should be informing the detailed design with the aim to reduce tree and other vegetation loss. In particular, vegetation losses for temporary works should be avoided as far as possible. This includes accesses, haul roads and compounds, but also any surveys, which may incur vegetation loss. Based on this detailed design, stage specific updated Trees and Hedgerows to be Removed and or Managed Plans will then need to be produced. However, these appear to stand independently from the outline LEMP and are governed by Requirement 8 rather than Requirement 4. As the AMS and the tree protection would emerge out of these Trees and Hedgerows to be Removed and or Managed Plans, as well as out of the detailed design, it would seem logical to link the tree protection plans to these plans rather than to the LEMP and secure them specifically through additional wording in Requirement 8. In this context, the Councils query what is intended for Appendix A Arboricultural Impacts Plan of the outline LEMP **[REP4-176 and REP4-177]** and how this relates to the Trees and Hedgerows to be Removed and or Managed Plans. With regards to the timeline, SCC and BMSDC consider that the detailed design, the Trees and Hedgerows to be Removed and or Managed Plans, the AMS and TPPs would ideally need to be agreed prior to pre-commencement

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			works to avoid unnecessary vegetation clearance. The Councils accept that this may not always be realistic but would seek re-assurance from the Applicant that vegetation clearance at per-commencement stage is kept to the absolute minimum required to enable pre-commencement works and required surveys.
DCO 2.S12	All local authorities The applicant	**Schedule 3 – Requirements 13 (Decommissioning)** Braintree DC, in its response to ISH2 Action Points [REP4-323], considers the DCO should include '…a clear obligation on the undertaker… to remove any equipment or infrastructure that becomes obsolete, in order to avoid unnecessary long-term impacts on landscape, heritage and residential amenity." The ExA would seek clarification from Braintree DC or any local authority: i) how the relevant planning authority would determine equipment/ infrastructure has become obsolete; ii) whether the removal of such equipment/ infrastructure should be within a specified/ fixed period of time from it becoming obsolete, for example 6 months; and iii) whether some form of control over the decommissioning of such obsolete equipment/ infrastructure, such as a written	Since this point was raised originally by Braintree DC, SCC and BMSDC will defer to them on this point, with a view to making any comments at the next Deadline if it considers further comments would be helpful.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		scheme of decommissioning to be submitted to the relevant planning authority for its approval, should be included within the requirement. The ExA also asks the applicant to comment on this matter.	
DCO 2.S13	All local authorities	**Schedule 4 – (Discharge of Requirements)** Schedule 4(3) - Fees The ExA notes the applicant's responses to ExQ1 [REP3-074], question DCO1.S20 related to fees and asks the local authorities if they wish to raise anything in regard to this matter, especially: paragraph 3(1)(a) of Schedule 4 (discharge of requirements) to the Draft DCO already providing for the application fee for the discharge of conditions to be such fee as is prescribed under the relevant regulations and the drafting in paragraph 3(1)(b) providing for an alternative figure or arrangement that would apply in the absence of there being a prescribed fee the term "per request" having the same meaning as in the Town and Country Planning regime, meaning that the fee would be per application for consent (i.e. more than one consent could be sought in one application) and not for each individual discharge of requirement or consent contained in an application for approval.	**General** SCC's and BMSDC's position on paragraph 3 (fees) of Schedule 4 (discharge of requirements) to the draft DCO **[REP4-038]** is set out in paragraphs 14.74 to 14.80 of its Local Impact Report **[REP1-178]**. Subject to what follows, SCC and BMSDC maintain that position. **(a) paragraph 3(1)(a):** as stated in paragraph 14.79 of the LIR **[REP1-178]** (and in subsequent documents) SCC and BMSDC consider it would be preferable if the applicant and SCC and BMSDC entered into a planning performance agreement ("**PPA**") for the full recovery of SCC's and BMSDC's costs in discharging any application under the Order. In the LIR, SCC and BMSDC stated that paragraph 3(1) should be recast to provide that no application can be made until an appropriate PPA is in place. The *Applicant's comments on the Local Impact Reports* **[REP2-030]** includes the following text in reply to paragraph 14.79 of SCC and BMSDC's LIR **[REP1-178]** –

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		It is noted the applicant has used the term 'per request', which as far as the ExA can see is not used in the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. The term 'Each Request' is used. The ExA invites all local authorities to comment on this should they wish.	"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". SCC and BMSDC have yet to receive the draft PPA and would encourage the Applicant share this as soon as possible, although note that engagement has begun. On a drafting point, and notwithstanding the precedents, it seems to SCC and BMSDC that, as currently drafted, the undertaker could still pay the prescribed fee (under paragraph 3(1)(a)) even if a PPA were entered into (under paragraph 3(1)(b)). This is because a fee must be paid under the arrangements described in paragraph 3(1)(a)) or under those described in paragraph 3(1)(b). While, as currently drafted, a PPA would seem capable of trumping the fee of £298, it would not seem capable of trumping the prescribed fee. In the light of this, SCC and BMSDC would suggest that paragraph 3(1) is amended as follows – "**3.** —(1) Where an application is made to a relevant authority for any consent, agreement or approval

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			required by a requirement (including consent, agreement or approval in respect of part of a requirement), **unless a bespoke arrangement has been agreed between the applicant and relevant authority and legally secured** a fee must be paid to the relevant authority as follows— (a) such fee as may be prescribed (under sections 303 and 333(2A) of the 1990 Act for the discharge of conditions attached to a planning permission); or (b) a fee of £298 per request ~~unless a bespoke arrangement has been agreed between the applicant and relevant authority and legally secured"~~." This drafting is proposed on the basis that a PPA will be entered into before the application for development consent is granted. If no PPA is entered into, SCC and BMSDC would request that the Secretary of State amends paragraph 3 to provide that no application can be made until an appropriate PPA is in place. **(b) "per request": The answer to DCO 1.S20 in the Applicant's Responses to First Written Questions [REP3-074] –** "The term "per request" will have the same meaning as in the Town and Country Planning regime, meaning that the fee would be per application for consent (i.e. more than one consent could be sought in one application) and not for each individual discharge of

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			Requirement or consent contained in an application for approval". SCC and BMSDC disagree with this statement because subordinate legislation is not constructed in this way. Section 11 of the Interpretation Act 1978 ("**IA 1978**") concerns how subordinate legislation is constructed and states – "Where an Act confers powers to make subordinate legislation, expressions used in that legislation have, unless the contrary intention appears, the meaning they bear in the Act". Here, section 114(1)(a) of the Planning Act 2008 ("**PA 2008**") confers powers on the Secretary of State to make an order granting development consent (i.e. a DCO) and since section 117(4) of the PA 2008 applies, the order must be contained in a statutory instrument, which is subordinate legislation. By section 11 of the IA 1978, expressions used in a DCO have the meaning they bear in PA 2008, unless the contrary intention appears in the DCO. The expression "per request" is not defined in the PA 2008 and so that expression would have its ordinary meaning i.e. every time the applicant asked for something to be done, the fee would be payable.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
5 HE Historic environment			
HE 2.13	All local authorities	**Updated version of the outline AMS/ outline WSI** The ExA is aware that, as referenced by the applicant in [REP4-298] an updated version of the outline AMS/ outline WSI [APP-328] is due to be submitted at deadline 5. However, the applicant has indicated that this updated document would be shared with the local authorities for review at deadline 4. Please provide any initial views (and without prejudice to any formal comments you may wish to make on the submitted version at deadline 6) on the updated version of the outline AMS/ outline WSI that you might have.	SCC (Archaeological Service) has provided its comments on these in **Appendix 1** and **Appendix 2** to this document.
6 LUS Land use and soils, green infrastructure			
LUS 2.4	The applicant All local authorities	**Green Belt - 3** With reference to paragraph 5.11.38 of NPS-EN1 can the applicant and local authorities identify any Local Green Spaces that have been designated in Local Plans that would enjoy the same protection as Green Belt through which the proposed development would pass, and confirm whether these areas should be given the same protection as green belt in the consideration of	The development passes through the plan areas of the following made Neighbourhood Plans: i. East Bergholt ii. Copdock and Washbrook iii. Sproughton iv. Stowupland v. Mendlesham vi. Diss and District

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		this application. If not please explain your reasoning.	All of these Neighbourhood Plans include locally designated Local Green Spaces, which should be afforded the same protection as Green Belt, in accordance with NPS EN-1 and NPPF paragraphs 108, 153, 154 and 155. However, SCC (Planning) and BMSDC confirm that the development does not pass through any of the designated spaces.
7 LV Landscape and visual			
LV 2.4	The applicant Suffolk County Council Essex County Council Babergh District Council Tendring District Council Dedham Vale National Landscape and Stour Valley Partnership	**Link pillars 3** The ExA are considering how the siting and detailed design of the link pillars and compounds are secured and approved by the relevant discharging authority, bearing in mind requirement 12 relates only to buildings. The applicant is asked to provide an appropriate form of wording in the draft DCO and / or control documents. This should include (but not limited to) siting, colour, appearance, compound size, surface treatment, fencing appearance and dimensions, and maintenance access. Do the relevant discharging authorities have any views on how detailed design matters should be controlled and discharged?	SCC (Landscape) and BMSDC consider that the detailed design matters for the link pillars should be submitted to and approved by the relevant discharging authority, secured by a Requirement (as drafted below): **12A. Design of link pillars** 1. No stage of the authorised development may commence until the design details of the link pillars have been submitted to and approved by the relevant planning authority. 2. In this requirement, the design details of the link pillars includes, but is not limited to, siting, colour, appearance, compound size, surface treatment, fencing appearance and dimensions, and maintenance access details. 3. The authorised development must be carried out in accordance with the approved design details of the link pillars.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			SCC and BMSDC further consider that the structures should be of a receding colour which blends with the environment and that screen planting is required to embed the structures and associated fencing into the surroundings and to reduce the adverse visual effects.
LV 2.16	All local authorities	**Mitigation and compensation - 1** Point 8.2e [REP4-302] states that the applicant considers it has provided sufficient mitigation and that the residual impacts are vastly and substantially outweighed by the public benefits of the proposed development, and that consequently further compensation for landscape and visual effects would be disproportionate. The local authorities, particularly Suffolk County Council, are asked to provide views on this statement, referring to the Bramford to Twinstead examination report where relevant. Any other IP may also respond if they wish.	SCC (Landscape) and BMSDC disagree with the Applicant in this matter and considers that the project as it is currently presented falls short in its provision for landscape mitigation and compensation for host communities. The starting point is the guidance in paragraph 4.1.5 of EN-1 on how the Secretary of State should undertake the overall planning balance between the adverse impacts and the benefits of energy NSIPs. The second bullet point in that advice is clear that the potential adverse impacts should take into account measures proposed to avoid, reduce, mitigate, or compensate for adverse impacts, 'following the mitigation hierarchy'. The mitigation hierarchy is only 'followed' if all component parts of it are applied, including (critically in this context) the expectation in para 4.2.11 that 'Applicants must apply the mitigation hierarchy' and in para 4.2.12 that 'Applicants should set out how residual impacts will be compensated for as far as possible.' The Applicant has wrongly inferred from para 4.2.15 – 4.2.17 of EN-1 that because some 'residual impacts' are likely for any NSIP, so there is no need to consider compensating for those impacts, even where that is possible, and that the residual impacts are simply left to form part of the overall planning balance, to be weighed

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			against need and any benefits. SCC considers that this is not the proper interpretation of EN-1. Para 4.2.15 (which addresses the CNP policy) is very clear that the policy on residual impacts only applies 'after the mitigation hierarchy has been applied'. A similar point is made in para 4.2.14, that the CNP policy is to be applied once the applicant has demonstrated that 'the requirements set out above have been met'. Those requirements include requirements in paras 4.2.11 and 4.2.12 of EN-1 (as above). Whilst compensation does not remove or reduce an impact (which is why it is at the bottom of the mitigation hierarchy), it is still a part of the mitigation hierarchy and should be provided 'as far as possible'. SCC remains of the view that meaningful compensatory/offsetting measures are indeed possible for the residual landscape impacts of the proposal. What the Applicant seeks to do, in effect, is to 'bypass' the requirement of the mitigation hierarchy to 'compensate, as far possible', and to simply push the unmitigatable (but potentially compensatable) residual impacts on to the final planning balance, where in most cases the CNP policy will ensure that they are outweighed by need for/benefit of the project. This approach would be to distort the mitigation hierarchy and make the provision of compensatory/offsetting measures not a question of considering what is realistically possible, given the particular residual impacts, but an optional extra that an applicant may choose to engage with or not, as it sees fit.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			The Councils do not consider that this is a proper application of the policy on the need to apply the mitigation hierarchy as set out in EN-1. The Councils agree that the project provides public benefits. However, the benefits are distributed over a much wider area, while the host communities, which will experience the long-term/ permanent significant residual adverse landscape and visual effects of the project will benefit no more than communities who will enjoy the benefits of the project without experiencing the harm. SCC has set out its comments on the findings of the Bramford to Twinstead ExA Report in **[REP4-336]** and above in response to GEN 2.2. In short, SCC does not say that 'all' residual impacts must be 'automatically' or 'fully' compensated for, and a case-by-case assessment is required of the extent to which compensation for the particular residual impacts is possible (including the proportionality of any compensation in that exercise). ***Embedded mitigation*** SCC and BMSDC consider that the adverse effects of the scheme could have been further reduced and/or in some areas avoided, if SCC's and BMSDC's change requests presented to the Applicant in the pre-application period had been taken on board. ***Replacement planting*** SCC and BMSDC consider that the Applicant's commitment to 3:1 tree replacement planting (as referred to in answer to GEN 2.2 above) to be essentially 'making good', as far as possible. Where full replacement planting

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			is not achieved, BNG will be eroded. Replacement planting includes the replacement of each removed mature tree with three new trees. ***Compensatory planting*** As it will not be possible to plant all replacement trees in the locations they were removed from, new areas of planting will be required, some of which will be outside the DCO limits. Beyond the commitment to plant these trees, which is welcomed by SCC, there is currently no strategic delivery mechanism that would maximise the potential benefits of the trees for landscape restoration and visual enhancement. ***Mitigative planting*** This is limited to planting around CSE compounds. In this regard, the Councils would welcome further engagement with the Applicant in order to achieve agreement on the outline proposals for Wenham CSEC, as expressed in the SoCG meeting on 2 June 2026. SCC is concerned that if the current proposals form part of the DCO then there will be insufficient room for improvement/changes/additions post-consent, as the detailed design would need to accord with the DCO- secured outline. The Council awaits explanation from the Applicant regarding their interpretation. The Councils are currently not content with the proposals at Wenham CSEC but considers that agreement could be achieved and that its change requests are reasonable and proportionate. ***Strategic landscape compensation and restoration***

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			SCC and BMSDC note the conclusions in the Bramford to Twinstead Examining Authority's Recommendation Report (paragraphs 3.9.196 to 3.9.197) with regards to landscape compensation. As stated in **[REP3-085]**, neither NPS EN-1 nor SCC (Landscape) expect that all residual effects can be removed. However, SCC and BMSDC consider that for those residual effects, that cannot be removed, compensation is the last resort and needs to be applied, and that NPS EN-1 supports this. 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. The Councils consider that landscape restoration should be considered along the entire length of the route, where significant residual effects are recorded (the area of influence), but efforts should be particularly focused around key areas (Waveney Valley, Mellis Common/ north of Gislingham, Gipping Valley, Bramford/Burstall substation area). The Councils welcome the current engagement with the Applicant in these matters, as detailed in answer to GEN 2.2 above.
8 SET Socio-economics, tourism and recreation			

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
SET 2.1	Babergh and Mid Suffolk District Councils	**Socio-economics** In your 'Comments on any further information or submissions received by deadline 1' [REP2-113] concern was raised in regard to the 'cumulative impacts of the proposed development' in relation to the applicant only considering other projects that physically interface with the order limits and the temporal interface of those projects which overlap. You considered other projects not considered by the applicant, as they fell outside of the above criteria, would also be likely to have socio-economic impacts when considered in conjunction with the applicants proposed development. These included i) pressure on the housing markets; ii) social integration; iii) loss of rental accommodation; and iv) pressure on local facilities and resources. The ExA would draw your attention to the applicant's response to your deadline 2 submission in its 'Comments on any Further Information or Submissions Received by Deadline 3' [REP4-298]. We would also draw your attention to the applicants document entitled 'ES Chapter 17 Cumulative Effects - Response Update' [REP4-163] and ask whether the applicant's responses in these documents adequately address the socio-economic concerns, as listed above, which you raised.	BMSDC remains concerned that Applicant has not fully assessed the impact (cumulative or otherwise) of construction on socio-economics, recreation or tourism. They have declared that there are *"no significant cumulative effects from the Project and the newly identified other existing and, or approved developments on socio-economic, recreation and tourism receptors within the areas surrounding the Project are anticipated during both construction and operation (and maintenance)".* BMSDC are minded to agree that long term operation of the pylons will not have a significant impact but disagree with this assessment in relation to the construction phase. The specific issue of severance alongside lengthy diversions during construction could cause significant harm to small businesses and communities accessing essential services, including education, healthcare and employment as well as leisure facilities. The visual impact of the construction is also likely to be significant, particularly when we are celebrating "Constable 250" this year and "Gainsborough 300" next year when the landscape in this specific area is likely to have a national focus e.eg. the Haywain is being exhibited at Christchurch Mansion this summer and this will attract national media to the area to showcase the landscapes that he painted.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		Please note the applicant has indicated an Employment and Skills Plan is to be submitted at deadline 5.	There will also be a significant anniversary for Benton End in 2030 (Cedric Morris), BMSDC are aware that the pylons are projected to have a direct impact on Benton End which BMSDC have identified specifically in a previous response.
9 MW Minerals and Waste			
MW 2.1	Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	**Contaminated Ground** Please confirm if you accept the applicant's assessment of contaminated ground risk as detailed in ES Chapter 9 [APP-181] and provide any comments, if applicable, on commitment GH10 in the outline CoCP [REP4-163].	SCC (Planning) defers to Babergh and Mid Suffolk District Councils on this point. SCC might comment on this issue at the next deadline if, having considered the Councils' reply, SCC considers further comments on this issue would be helpful.
MW 2.2	The applicant Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	**Quarries and Minerals Plan Candidate Sites** Please provide an update from ExQ1 on consideration of design and land use considerations in the vicinity of existing quarries and candidate sites.	SCC (Planning) confirms that there are no known issues at time of writing.
10 SS Safety and security			
SS 2.4	The applicant	**Aviation safety resolution – Agent of change**	NPPF December 2024 (as amended) paragraph 200 states:

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
	General Aviation Awareness Council Norfolk Gliding Club/Tibenham Airfield Raydon Wings Aerodrome Priory Farm And any other relevant IP	It was stated in ISH2 and is reiterated in the written summary of oral submissions [REP4-302] that the matter of public safety is one for the aerodrome operator and that insofar as operations are alleged by an operator to be unsafe then they will not happen and the operator will cease that element of the operation. However, there is clearly a difference in opinion between the applicant and many of the relevant airfield operators between whether the proposed development will cause issues of public safety. The ExA understands the position of the applicant in this matter (in short that no harm will be caused, save to Chase Farm) but would appreciate the views of all relevant parties on the relevance of the 'agent of change' principle within the National Planning Policy Framework (paragraph 200).	*"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."* SCC (Planning) considers that the Norfolk Airfields of Priory Farm and Tibenham would be significantly affected by having 50m high pylons introduced under the existing circuit pattern. Aircraft departing or arriving will face additional obstructions which would make technical or human factor error very much more hazardous and potentially fatal. The remedy would be to re-route the overhead lines or bury them under the surface. A similar situation exists in respect of Raydon Wings whereby the Cable Sealing End Compound and the crude opencut trench burial of the adjacent cables will again introduce serious hazards into the flight paths and ground rolls of aircraft operating in and out of the airfield, potentially with fatal consequences. The remedy in this instance would require moving the CSEC further north and routing the cable away from the grass runway or by using horizontal directional drilling to bury it.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
11 TT Traffic and transport			
TT 2.2	National Highways Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	**PARs 2** Please highlight any residual concerns you may have regarding specific PARs which you believe have not been adequately addressed by the applicant and where you may have concerns about ability to address them either during or after the examination.	**B1113 to Finningham** Whilst SCC (Highways) acknowledges that the Applicant has proposed mitigation, the Council has residual concerns with how this will work in practice. However, SCC hopes that the positive working relationship with National Grid on this project continues and that if any issues arise then they will work with the LHA to resolve them.
TT 2.4	National Highways Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	**Outline CTMP 2** Following ISH2, at DL4 the applicant updated the outline CTMP [REP4-174] with regard to community engagement with councils, parish councils, other developers and the public. Please provide comments on this updated proposal.	SCC (Highways) considers that more detail is required as to communication and the proposals, specifically with local organisations such as County, District and Parish Councillors.
TT 2.9	The applicant National Highways	**Outline CTMP 6** In their response action points at ISH2 [REP4-336] at paragraph 11.5.d, Suffolk CC propose a quarterly report on the key transport parameters, some of which they go on to list. Does the	SCC (Highways) considers that the quarterly report should be secured within the CTMP with the contents agreed with the LHA. There is a strong preference that this document should be made available to the public. The LHA considers that this will help reassure local communities that the

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
	Essex County Council Thurrock Council Norfolk County Council	applicant consider this appropriate and how would this be secured in the DCO. Please can the other highway authorities comment on this proposal.	management of construction traffic is transparent and accountable.
TT 2.10	National Highways Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	**Cap on Heavy Goods Vehicles (HGVs)** Please can all highway authorities who have not done so already, provide comments on whether you consider a cap on HGVs is required or if the applicant's proposals to provide a three month forward view is acceptable. If you have commented previously, please signpost the ExA to your latest position on this matter.	SCC (Highways) welcomes the three month forward view, however, this should be provided in addition to caps on HGV numbers, not as an alternative. Caps should be placed on HGV movements to secure what the LHA understands to be the Applicant's realistic worst-case assessment. This would give reassurance to the LHA and local communities that movements will not exceed those assessed.
12 WE Water environment: flood risk, hydrology and drainage			
WE 2.1	Water Management Alliance Essex County Council Thurrock Council Suffolk County Council	**Drainage Strategy** Please provide comments on the updated drainage strategy submitted at deadline 4 [REP4-186].	SCC (LLFA) has provided comments on **[REP4-186]** in its Comments on Submissions Received at Deadline 4.

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
	Norfolk County Council		
WE 2.2	Water Management Alliance Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	**Progress with agreement of issues** The applicant states that it is confident that drainage issues can be resolved by close of the examination, please explain if you consider this an accurate reflection of progress and if there are specific matters you consider are at risk of not being agreed by the close of the examination.	SCC (LLFA) confirms that this is an accurate reflection of progress and are working towards an agreed strategy with the Applicant. The Council's position is therefore that matters, as stated in the SoCG, are likely to be agreed before the close of the examination.
WE 2.3	Water Management Alliance Essex County Council Thurrock Council Suffolk County Council Norfolk County Council	**Disapplication of section 23 of the Land Drainage Act 1991** Further to applicants reply to WE 1.9, please confirm acceptance, or otherwise, to the disapplication of section 23 of the Land Drainage Act 1991 and provide an update on your consideration of the applicants proposed protective provisions in this regard.	SCC (LLFA) does not agree to the disapplication of section 23 of the Land Drainage Act 1991, as indicated in **[REP4-336]**. If the Applicant's proposed Protective Provisions are in accordance with the determination period as set out in Section 23 of the Land Drainage Act 1991 then SCC could find these agreeable.
13 HW Health and Wellbeing			
HW 2.1	The Applicant	**Communication Strategy** In your response to ExQ1 HW1.9 [REP3-074] in relation to Colchester City Council's Local Impact	SCC (Public Health) welcomes the ExA's recognition of the importance of monitoring health and wellbeing impacts, and its suggestion that appropriate commitments should

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		Report (point 5 – a robust health and wellbeing monitoring framework with enforceable commitments) amongst other matters you state: "*It may, however, be appropriate to identify specific actions in addition to the above that could help with understanding community mental health over the pre-construction, construction and operation periods. This could include reviewing the number and type of complaints or concerns raised during construction works through the complaints procedure identified. Complaints / concerns could be categorised by theme, type of action and speed of escalation. This would help understand where further communication may be required with local communities*". The suggestions put forward would appear to be applicable across the range of points raised on this issue by a number of local authorities. However, there are no commitments included in the outline CoCP [REP4-164] or commentary related to such matters in its Appendix E [REP4-168]. The ExA are of the view that appropriate commitments in the outline CoCP or commentary in Appendix E to set out such approaches would be necessary to bring the suggestions into effect and ensure there were appropriate enforceable commitments in the DCO documentation. The applicant is asked to update either the outline CoCP or appendix E to include suitable wording to	be secured within the CoCP. SCC has consistently emphasised throughout the examination that there is a lack of a clearly defined mechanism to monitor the projects impacts on health and wellbeing. Monitoring is an important component of mitigation in its own right. Particularly in the context of a large scale and prolonged construction programme where impacts on communities may evolve over time and may not be fully predictable at the point of assessment. As set out in SCCs previous submissions, including **[RR-3520]**, health and wellbeing effects associated with NSIPs are often influenced by factors such as uncertainty, perceived loss of control, and cumulative pressures, and therefore require a responsive and iterative approach rather than a fixed set of mitigation measures. This is particularly important in Suffolk, where multiple NSIPs are either ongoing or anticipated, increasing the risk of cumulative and interacting effects on affected communities. SCC considers that the CoCP should include a commitment to the development and implementation of a Health and Wellbeing Monitoring Framework, to be secured prior to the commencement of construction and maintained throughout the construction phase. The framework should establish an appropriate baseline and enable the detection of change over time, drawing on a combination of quantitative indicators and qualitative community feedback. This should include as a minimum, the use of existing population level data alongside locally

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
		bring into effect your suggested actions. If not explain why not.	specific primary data collection to understand lived experience, including factors such as stress, sleep disturbance, perceived control and trust in the project. It is suggested that monitoring should not be limited to periodic reporting, but should form part of an adaptive management approach, whereby findings are reviewed at defined intervals and used to inform the refinement of mitigation measures. This should include clearly defined reporting and governance arrangements, with regular review points during construction and a mechanism for escalation where monitoring indicates deteriorating wellbeing outcomes or disproportionate impacts on particular communities or groups. The purpose of such an approach is to ensure that mitigation remains responsive to real world impacts, rather than being fixed at the point of consent. Given the likelihood of cumulative impacts arising from multiple NSIPs within Suffolk, SCC also considers it important that the CoCP includes a commitment to align, where practicable, monitoring approaches with those of other projects operating within overlapping geographic areas or timeframes. This would support the identification of cumulative or interacting effects, reduce duplication of engagement activity, and minimise consultation fatigue for affected communities, whilst improving transparency and consistency in reporting. Governance arrangements should include a mechanism for joint review of monitoring outputs with the relevant

ExQ2	Question to:	Question:	SCC and BMSDC Answer:
			local authorities and other key stakeholders, enabling agreement of mitigation where required.

Suffolk County Council

NORWICH TO TILBURY

EN020027

APPENDIX 1 OAMS-OWSI Review

Answers to Examining Authority Questions Round 2

Suffolk County Council [redacted]

1 Deadline 5 review of the OAMS-OWSI

7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI)				
Stakeholder's ref.	**Referenced Paragraph or Item**	**Stakeholder's comment**	**Applicant's Response**	**SCCAS Comments**
Norfolk	**Norfolk**	**Norfolk**	**Norfolk**	
N/A		Evaluation versus mitigation Comment on Norfolk CC's contention in [RR-2753] that your submitted archaeological assessment methodology needs to make a clearer distinction between pre-consent work which the NPPF labels as 'evaluation' and post-consent work which is usually termed as 'mitigation'.	The Applicant believe that the current iteration of the AMS makes the distinction clear	
Suffolk	**Suffolk**	**Suffolk**	**Suffolk**	
10.1	General	In line with the requirements of the Overarching National Policy Statement for Energy (EN-1), the historic environment must be considered as an integral part of the environmental assessment process. EN-1 (Section 5.8) requires applicants to assess the significance of heritage assets and the impact of proposed developments on them, including mitigation where appropriate.	Noted	Noted
11.1	General	Similarly, EN-5 (Electricity Networks Infrastructure) reinforces the need to consider the historic environment in the context of infrastructure development. These	Noted	Noted

		policies make clear that impacts on heritage assets must be properly assessed and addressed through appropriate mitigation strategies, secured during the pre-commencement phase of works.		
1.3 Purpose of the Outline AMS-OWSI				
10.2	1.3.1 "The purpose of this document is to set out the process, guiding principles and methods for the planning and implementation of additional archaeological mitigation works (and any post-consent archaeological work proposed to mitigate the adverse effects of the Project.")	This statement needs to be amended as the AMS-OWSI purpose is to set out the principles and methodology of post-consent archaeological evaluation and archaeological mitigation. For archaeology this is to mitigate the impacts of the development upon archaeological heritage assets. SCCAS would recommend the following amendment to add clarity to the documents purpose: "The purpose of this document is to set out the guiding principles and methodologies for post-consent archaeological evaluation and archaeological mitigation. For archaeology, its primary function is to ensure that the impacts of the development on archaeological heritage assets are appropriately assessed and mitigated."	Text edited as requested	no further comment

10.3	1.3.2 *"This document details the types of archaeological mitigation proposed to reduce the effect of the Project on archaeological remains."*	This paragraph needs to be amended; we suggest the following wording: "This document details the archaeological preservation in situ management and archaeological investigations and recording, proposed as mitigation for the impacts of the development upon archaeological heritage assets." This is to add clarity to the purpose of the document. The purpose of the OWSI, which is to detail the process of all post-consent archaeological work; evaluation (geophysical survey and trial trenching), archaeological mitigation, post-excavation assessment, reporting, publication and archiving.	Text edited as requested	no further comment
10.4	1.3.4 "*Appropriate and proportionate geophysical (magnetometer) survey and archaeological trial trenching has been undertaken to date. This is summarised in Section 1.8. Alongside the detailed desk-based information included in assessment this is considered to provide a reasonable basis for assessment necessary for the purposes of the ES (document reference 6.11).*	We would recommend the following amendment for the first sentence of this paragraph: "For some areas of the project impact geophysical survey and archaeological trial trenching has been undertaken to date." This clarification is important for the Examination, as not all areas affected by the proposed development will have undergone archaeological evaluation. This is because certain design elements, such as haul roads and overhead sections, have not yet been finalised.	Text edited as requested	no further comment

11.4	*1.3.4* *It is expected that limited additional archaeological evaluation would also be carried out post-consent at certain locations along the Project where access was previously not possible or where only a limited amount of work was carried out pre-consent. This assumes that the majority of evaluation would have been undertaken during the pre-consent phase, as set out in Section 1.8. The purpose of this would be to inform the detailed mitigation requirements."*	"It is expected that ~~limited~~ additional archaeological evaluation would also be carried out post-consent at ~~certain~~ locations along the Project where access was previously not possible or where only a limited amount of work was carried out pre-consent, or where designs of impacts have yet to be finalised" · The term "limited" should be removed, as the archaeological evaluation must be undertaken to the same scope and standard as the pre-consent archaeological works. This ensures consistency in the evaluation approach. · The use of the term "certain" is inappropriate, as it implies a selective approach. Archaeological evaluation is required for all areas subject to development impact where pre-consent evaluation has not been undertaken. This requirement is not discretionary.	Text edited as requested	The paragraph is fine up to this sentence: *"This assumes that the majority of evaluation would have been undertaken during the pre-consent phase, as set out in Section 1.8."* SCCAS would advise the removal of the sentence. This is because this is not relevant to this section and it is unlikely to be true given the current progress of the pre-consent programme of evaluation and where we are at in the examination.

		SCCAS recommends the inclusion of figures to add clarity and support the archaeological strategy. One figure should show all areas where geophysical survey and trial trenching have been completed, and a second figure highlighting all areas where the evaluation remains outstanding and are to be undertaken post-consent. These visual aids will help ensure that archaeological evaluation is clearly documented and that future mitigation is appropriately targeted and timetabled.	Two figures have been produced in support of the AMS: Figure 1: Archaeological Mitigation Strategy (AMS).pdf Figure 2: Location of Archaeological Mitigation Areas Within Priority Trial Trenching Area	Details of archaeological mitigation areas can only be provided in Detailed Written Schemes of Investigations (DWSIs), and agreed with the relevant LPAAA and Historic England where relevant. Having areas defined as mitigation in the AMS-OWSI will lead to issues later on if designs change post-consent, as final designs vary. There is little value having these defined in the AMS-OWSI as the AMS-OWSI cannot function as a DWSI, and would be contrary to the dDCO requirement wording, which requires DWSIs **Figure 2 (7.5.F2):** Is misleading as it includes the entire length of the scheme and only defines an "Where mitigation areas are yet to be defined". However, it does not include this for the areas where evaluation has not been completed as shown in Figure 1 as areas where "mitigation areas are yet to be defined". This will need to be included in Figure 2.

				Figure 2 also needs to include the trench locations. Full reporting has not been provided on all sites, and no discussion on mitigation has been had with the LPAAA. Therefore, archaeological mitigation areas should not be included in the OAMS-OWSI.
10.5	image 1.1 	this should include: “Post-consent Detailed WSIs produced for; phases of archaeological work, geographical areas or elements of construction works” This clarifies that multiple DWSIs may be produced for a single section, particularly where post-consent evaluation is needed to inform mitigation, as implied by the flow chart.	Graphic edited as requested	no further comment

10.6	Image 1.1 	This should also include archiving. Additionally, there needs to be two more stages prior to this stage. For clarity of the procedure please add in: 1. Produce Post-Excavation Assessment Report and Updated Project Design (PXA/UPD). 2. Share with Stakeholders for agreement. 3. Include details about when discharge of requirement is appropriate. **Notes:** 1. All costs for detailed assessment, reporting, publication, and archiving must be agreed and secured at the Updated Project Design stage. 2. Archive deposition costs for Suffolk must also be secured at this stage, as the County Archaeology Store is the only suitable repository. 3. Digital archive deposition costs must be secured at the same stage, with ADS as the required repository for Suffolk.	Graphic and text edited as requested	no further comment
1.4 Scope of the Outline AMS-OWSI				

10.7	1.4.1 "*This document follows the approach to mitigation set out in ES Chapter 11: Historic Environment (document reference 6.11) of the ES (Volume 6 of the DCO application) and mitigation measures in the Outline CoCP (document reference 7.2).* Mitigation in the Outline CoCP is secured by Requirement 4 and mitigation within this Outline AMS-OWSI is secured by Requirement 5 in the Draft DCO (document reference 3.1) which would require the Main Works Contractor(s) to submit, have approved by the relevant discharging authority, and comply with, Detailed WSIs that are substantially in accordance with this document. All pre-commencement operations listed in the Draft DCO (document reference 3.1) would be carried out in accordance with this Outline AMS-OWSI."	Please add in the following red text: "All pre-commencement operations listed in the Draft DCO (document reference 3.1) would be carried out in accordance with this Outline AMS-OWSI and relevant DWSIs."	Text edited as requested	The programme of post-consent archaeological work is secured by DCO requirement 5 and an approved OAMS-OWSI. It cannot be secured by the OCoCP, the OCoCP can only reference the OAMS-OWSI. It is highly likely that archaeological works will continue into the period post-commencement of the authorised development. However, DCO requirement 5 will apply to the delivery of ALL archaeological works (evaluation and mitigation) throughout the project. **NB.** We are aware that there are concerns about the ability of NG to undertake archaeological works during pre-commencement and that this may have implications for project programme. However, this can be easily solved by including pre-commencement works and period in the DCO Requirement 5 wording. This would allow archaeological works under DWSIs to be undertaken during

				this period.
10.8	1.4.2 "*The Outline AMS-OWSI sets out the framework for archaeological mitigation of sites affected by the Project. This document conforms with current good practice as defined*	Please include local guidance to this paragraph as the local guidance documents are referenced the bullet points below: "The Outline AMS-OWSI sets out the framework for archaeological mitigation of sites affected by the Project. This document conforms with current good practice as	Text edited as requested	no further comment

	by national and professional standards, and takes account of relevant guidance including but not limited to:"	defined by national, local and professional standards, and takes account of relevant guidance including but not limited to:"		
10.9	1.4.4 *"The mitigation measures proposed within this Outline AMS-OWSI are informed by established approaches set out in recognised national guidance, such as the Design Manual for Roads and Bridges (DMRB) LA 106 (Cultural Heritage Assessment, National Highways, 2020). While the Project is not a road scheme, this guidance provides nationally recognised approaches to mitigation strategies for archaeological remains within linear infrastructure contexts. Its principles are broadly applicable to large-scale infrastructure projects, including linear energy developments."*	This should also reference EN-1 and EN-5 and CIfA guidance, which is referenced in DMRB LA 106.	Text edited as requested	no further comment

10.1	1.4.6 "*Embedded, standard and additional mitigation measures relevant to the Historic Environment are described in ES Chapter 11: Historic Environment, Section 11.6 (document reference 6.11) and the Outline CoCP (document reference 7.2).* Standard and additional mitigation measures specific to the Historic Environment are secured through Requirement 4 in the Draft DCO (document reference 3.1) which would require the Main Works Contractor(s) to prepare the CoCP to discharge the Requirement."	This is incorrect, as Section 11.6 contains no mitigation measures. The AMS-OWSI outlines the mitigation process but cannot define specific mitigation measures until evaluation is complete. Site or section specific mitigation will be detailed in the DWSIs, once informed by the evaluation.	SCCAS appear to have misinterpreted the text Section 11.6 of the ES is Proposed mitigation and lists various embedded standard and additional mitigation measures.	The OAMS-OWSI is the document which defines the mitigation measures, the OCoCP references other documents which do detail the mitigation measures. This is not the same as containing it itself. The OAMS-OWSI and DWSIs provide the appropriate detail for managing all archaeological mitigation for the project.
10.11	1.4.7 *"Standard and additional mitigation measures for archaeology set out in the Outline CoCP include:"*	The Standard and additional mitigation measures are insufficient for delivery of the project, as they do not provide sufficient details of the archaeological process, archaeological evaluation and mitigation.	Included a sentence here signposting to section 5.3 which does contain further details on the archaeological process	noted

10.12	1.4.7 "**H01 -** *Methodology and processes for archaeological mitigation is specified through the Outline AMS-OWSI (document reference 7.5) to be submitted with the DCO application."*	This should read: "Methodologies and processes for further archaeological evaluation and mitigation are specified within the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) (document reference 7.5). This document provides the framework for identifying, assessing, and managing archaeological heritage assets and will directly inform the production of Detailed Written Schemes of Investigation (DWSIs) for specific areas or phases of the Project." This clarification strengthens the purpose of the Outline AMS-OWSI by ensuring that archaeological evaluation, such as geophysical survey and trial trenching, is appropriately scoped and implemented. These evaluations are essential for identifying areas of archaeology and informing proportionate mitigation strategies.	Text edited as requested	No further comment
10.13	1.4.7 "**H03 -** *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."*	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	At this current time it is not the Applicant's intension to maintain live constraints mapping during the construction phase of the Project	We would strongly recommend the use of live constraints mapping to ensure that inadvertent breaches do not occur. Live constraints mapping is a tool used on other NSIP projects. This is not just for archaeology, but for all other areas of the project.

		identification and mapping of these constraints is essential to ensure effective avoidance and mitigation.		
10.14	1.4.7 "**H04 -** *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 or excavation and recording, whichever is practicable within the Project construction requirements."*	A robust protocol must be established to train operatives in identifying archaeological remains during construction works. 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. Thorough evaluation (through geophysical survey and trial trenching) is a critical component of the pre-application and pre-construction process. These combined methods help identify areas of archaeological sensitivity, assessing the significance of known and unknown assets, and inform the development of proportionate and effective strategies to mitigate the impacts of the development upon the Historic Environment. Early identification enables the project to integrate mitigation into the programme timetable, reducing the likelihood of unexpected discoveries and ensuring compliance with planning policy	Paragraph 1.4.8 added	SCCAS would advise for clarity the following amendments to H04: *"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,* **during construction activities,** *the Project will inform the LPA and Historic England and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements.* **This will be secured through a DWSI or Preservation In Situ Management Plan, in line with the approved OAMS-OWSI.** *The Main Works Contractor(s) will be*

		and best practice guidance.		*responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This will include toolbox talks within site inductions".* This provides clarity that H04 only applies to archaeological discoveries made during the construction activities. If H04 is amended to the above, then the inclusion of 1.4.8 will work in conjunction with H04.
1.5 Structure of the Outline AMS-OWSI				

10.15	1.5.1 "*Chapters 1 to 4 of this document comprise the outline archaeological mitigation strategy. They describe the principles to be applied when designing and implementing archaeological mitigation for the Project. They propose strategies and approaches for the protection of archaeological remains to be retained and for the investigation, recording, analysis, and publication of archaeological remains to be removed in advance of construction.*"	This should include: Chapters 1 to 4 of this document comprise the outline archaeological mitigation strategy. They describe the principles to be applied when designing and implementing a programme of archaeological evaluation and mitigation for the Project. This highlights the need for further evaluation to inform appropriate archaeological mitigation in response to development impacts.	Text edited as requested	No further comment
10.16	1.5.3 "*Chapter 6 of this document details the requirement for post-excavation analysis and the eventual publication of the archaeological and other heritage work arising from the mitigation programme.*"	Chapter 6 should detail the requirement for post-excavation analysis, publication and deposition of archives arising from the programmes of archaeological fieldwork other heritage work arising from the mitigation programme This removes the word "eventual" to emphasise that post-excavation analysis, publication, and archive deposition must occur in a timely manner, and clarifies the post-excavation process outlined in Chapter 6.	Text edited as requested	no further comment
1.6 Status of this Document				

10.17	1.6.2 "*This Outline AMS-OWSI has been agreed in principle with the Local Planning Authority Archaeological Advisors. This document will be updated in agreement with the Local Planning Authority Archaeological Advisors and will be provided to them for approval.*"	This document is not currently agreed in principle. SCCAS reviewed a draft in April 2025. However, due to its substantially incomplete nature, we were unable to provide comprehensive comments or offer agreement in principle. Consequently, the referenced paragraph is inaccurate until the document has been formally approved by the LPAAA.	This text has not been edited on the assumption that we will get agreement in principal before submission at Deadline 5	The document is not yet approved, and this statement is more of a representation to the ExA, rather than something that should be included as a control document. The applicant should look at the OAMS and OWSI as separate documents. The OWSI is a control document specifically to outline the delivery of a post-consent archaeological programme. The OAMS defines principles around archaeological evaluation and mitigation to inform the DCO examination process and is not a primary control document used to manage post-consent delivery. A meeting with the Applicant would be extremely useful to discuss approval of these documents.
1.7 Roles and Responsibilities				

10.18	1.7.3 "*The Local Planning Authority Archaeological Advisors will be responsible for confirming that the requirements of the DCO are met, in accordance with any conditions relating to archaeology. The archaeological Advisors will be responsible for final sign off and approval of all mitigation measures."*	This paragraph should add in the following sentence in red. "The Local Planning Authority Archaeological Advisors, working with the discharging authority, will be responsible for confirming that the requirements of the DCO are met, in accordance with the DCO requirements relating to archaeology. The Local Planning Authority Archaeological Advisors will be responsible for final sign off and approval of all mitigation measures." This should acknowledge who the discharging authority would be in accordance with the DCO.	Text edited as requested	**This may need to be amended in line with discussions that are being had in the Examination regarding the Local Government Reform.** Please amend the paragraph to include the following: *"1.7.3 The Local Planning Authority Archaeological Advisors (LPAAA), working with the discharging authority, will be responsible for confirming that the requirements of the DCO are met, in accordance with the DCO requirements any conditions relating to archaeology. The Local Planning Authority Archaeological Advisors will be responsible for final sign off and approval of all mitigation measures,* **post-excavation assessment, updated project design, publication, outreach and deposition of archive. "** This keeps the LPAAA role consistent throughout the document.

	1.7.4	The ACoW, working on behalf of National Grid, will be responsible for liaising with the Archaeological Advisor to ensure that evaluation and mitigation measures are correctly implemented, monitored, and maintained during the construction phase of the works.		This should be amended to refer to the "archaeological advisor" as the **Local Planning Authority Archaeological Advisors (LPAAA)** to keep this consistent with the rest of the document.

10.19	1.7.5 "*National Grid will appoint an Archaeological Contractor to carry out the archaeological evaluation and mitigation fieldwork. The Archaeological Contractor will be responsible for the production of DWSIs for each stage of archaeological investigation.*"	This paragraph should also specify the party responsible for submitting the Detailed Written Schemes of Investigation (DWSIs) to the LPAAA for review and approval.	Following text added: "National Grid will appoint an Archaeological Contractor to carry out the archaeological evaluation and mitigation fieldwork. The Archaeological Contractor will be responsible for the production of DWSIs for each stage of archaeological investigation. National Grid's Archaeological Advisor will submit the DWSIs to the appropriate LPAAA for review and approval."	No further comment
1.8 Summary of Evaluation Fieldwork Undertaken by the Project				
10.2	1.8.1 "*The results of the evaluation fieldwork completed to date are contained in ES Appendix 11.3: EACN Geophysical Survey Report (document reference 6.11.A3), ES Appendix 11.4: Geophysical Survey Results Report (document reference 6.11.A4), ES Appendix 11.5: Trial Trenching Results Reports (document reference 6.11.A5) and ES Appendix 11.6: Geoarchaeological and Archaeological Monitoring of Ground Investigation Works*	The way this paragraph reads in its current form could be miss understood about the extent of the work that has been undertaken to date. SCCAS would recommend the following amendment in red to clarify this: "The results of the evaluation fieldworks completed to date for the priority areas only are contained in…"	Text edited as requested	No further comment

	Report (document reference 6.11.A6). The results of this fieldwork are summarised in the ES Chapter 11: Historic Environment (document reference 6.11) and included in assessment in ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2).”			
10.21	1.8.2 “*Table 1.1 below provides a summary of the progress to date* and future programme for the archaeological evaluation fieldwork for the Project. The table refers to priority and non-priority areas for fieldwork. Priority areas have been defined based on reduced design flexibility, construction methodology, and the associated extent of archaeological impact likely to result from their construction. The Limits of Deviation (LoD) allows for greater flexibility at	Table 1.1 only covers the priority areas and non-priority areas that have been currently identified. This does not cover all areas of construction impact yet to be identified.	Following text added: "Trial trench evaluation of non-priority areas, which will include all identified or as yet unidentified areas of below ground construction impact, will be agreed with Local Planning Authority Archaeological Advisors and is expected to follow the same approach to areas of physical impact from construction as for the priority areas."	We cannot see that this amendment has been added to the OAMS-OWSI. We are happy with it to be included, please ensure it is added to 1.8.2

	the construction stage for some elements of the Project than others, for example the overhead line in comparison to temporary construction compounds. The priority areas have less design flexibility in the LoD than the non-priority areas. Construction programme considerations have also informed the classification of priority areas. Priority areas comprise:"			
	1.8.3 Ecological and landscape mitigation areas/biodiversity net gain areas (although noting that the majority of these areas have been evaluated as part of the priority phase of work).			Question: It states that these areas have been evaluated as part of the priority phase of works, is the BNG inclusive of areas beyond the project Order Limits? We are aware that discussions are being held with the applicant around the creation of BNG offsite, ecological enhancements, as these have yet to be defined, these have not been subject to any form of archaeological assessment or evaluation.

10.22	1.8.4 "*In most cases the classification of priority areas for geophysical* survey and archaeological trial trenching are the same. However, for geophysical survey the priority areas also include some sections of proposed overhead line or 3rd party mitigation works where there is assessed to be higher archaeological potential. As there is greater flexibility in final design for these design elements and the working areas, and consequently areas of physical impact, are smaller, they have not been included in the priority areas for archaeological trial trenching."	Please remove *"consequently areas of physical impact, are smaller they have not been included in the priority areas for archaeological* trial trenching." As this is materially incorrect, as where archaeological remains exist the damage would be equivalent.	This text has not been edited as it is not ruling out trial trenching, just that it not being undertaken at the priority stage.	The applicants' comments need to be made clearly within this section. Please include a clear statement "**all areas of physical impact will be evaluated, both geophysical survey and trial trenching**"
10.23	Table 1.1	Please remove the word "contingency" from the post DCO Consent/Pre-commencement sections of this table. **All areas that have not been evaluated where construction impacts will occur, must be evaluated** (geophysical survey and trial trenching) prior to commencement. This is to inform an appropriate mitigation strategy. This is to provide clarity in the process and to ensure that all areas impacted by the development will be evaluated to inform on	Following edit made: ~~Contingency~~ Archaeological evaluation for any areas where access not possible pre-consent. This document includes provision for this and will be secured through the DCO.	As the OAMS-OWSI is one document it presents difficulties that Section 1.9.1 – 1.9.2 are included, as it does not progress the archaeological works, this could be simplified to a single statement "**All areas that have not been evaluated prior to determination will be evaluated post-consent**"

		an appropriate archaeological mitigation strategy.		
10.23		The AMS-OWSI should clearly state that not all areas of the Order Limits have been surveyed and on the areas that have been surveyed only magnetometer survey was undertaken. **No other geophysical** techniques have been deployed. The results presented therefore relate exclusively to magnetometer data and without "ground truthing" the results should not be interpreted as a comprehensive characterisation of the archaeology within a given area/site.	Following paragraph added: 1.8.5 It should be noted that geophysical survey undertaken for the Project comprises magnetometer survey and no other geophysical techniques have been deployed. The results presented, therefore, relate exclusively to magnetometer data and without "ground truthing" the results should not be interpreted as a comprehensive characterisation of the archaeology within a given area/site.	We welcome the inclusion of 1.8.5

	1.10.1 Phase 2 archaeological trial trenching...			1.10.1 - should refer to the DWSIs rather than SSWSIs Please include the following amendments: "Evaluation will comprise a ~~maximum~~ 4% sample by area of these elements of the project, **unless otherwise agreed with the relevant LPAAA**, with a 1% contingency to react to on-site requirements..." "The archaeological contractor(s) will also submit for approval to the relevant LPAAAs ~~Site Specific Written Schemes of Investigation (SSWSI)~~ Detailed Written Schemes of Investigation (DWSIs) for Phase 2 ~~evaluation~~ **trial trenching** areas, which will include a ~~trench plan, and a site-specific archaeological background which will set out specific methodologies related to the archaeological resource expected within the site~~ **trench plans, site-specific archaeological background and detailed methodologies."** This provides consistency for DWSIs throughout the document and clarity over the content of the DWSIs.

	Table 1.2			It is unclear as to why Table 1.2 is included in a DCO control document, this is a representation to the ExA We are confused by the percentages given in this table, as they do not appear to add up. For phase 2 geophysical survey it states that 30% has been provided but then a final 16% will be submitted, what happens to the remaining 54%? For trial trenching the focus appears to be on completed fieldwork, how many of the sites have been completed with full reports to inform a programme of mitigation for the priority areas? For clarity, the project needs to draw a line for the examination submissions as there will be a point where new information submitted would not inform the decision. Any further submissions will be submitted post-DCO. SCCAS would recommend the removal of Table 1.2 from the OAMS-OWSI as it is not required for a control document. The applicant can supply the table as a separate

				representation to the ExA. SCCAS would recommend a meeting with the applicant to discuss this further.

2 Principles and Objectives for Archaeological Mitigation

2.1 Principles

10.24	2.1.3 "*Additional archaeological mitigation is required where there would be an unavoidable impact on archaeological remains and associated deposits. The sites of archaeological interest which would require mitigation were initially identified in ES Chapter 11: Historic Environment (document reference 6.11) and ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2) (and any further environmental information – as detailed within ES Chapter 11: Historic Environment document reference 6.11) and Table 1.1, regarding providing Historic Environment baseline and assessment following further evaluation).*"	Please remove the word additional from this paragraph, as archaeological mitigation will be a requirement of the DCO. This is incorrect, as the evaluation results are only for the priority areas and not the full scheme. All areas where there are potential impacts upon archaeological remains must be evaluated to inform appropriate mitigation strategies.	Following edit made: ~~"Additional~~ Archaeological mitigation is required where there would be an unavoidable impact on archaeological remains and associated deposits. The sites of archaeological interest which would require mitigation, were initially identified in ES Chapter 11: Historic Environment (document reference 6.11) and ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2) (and any further environmental information – as detailed within ES Chapter 11: Historic Environment document reference 6.11) and Table 1.1, regarding providing Historic Environment baseline and assessment following further evaluation)."	Archaeological mitigation cannot be determined by desk-based assessment. ES Chapter 11: Historic Environment (document reference 6.11) and ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2) is only an initial assessment of known archaeological heritage asset significance. We would therefore advise the following amendment: "Archaeological mitigation is required where there would be an unavoidable impact on archaeological remains and associated deposits. ~~The sites of archaeological interest which would require mitigation~~ **An initial assessment of known archaeological heritage assets, using desk-based sources, was undertaken in** ~~were initially identified in~~ ES Chapter 11: Historic Environment (document reference 6.11) and ES Appendix 11.2: Historic Environment Assessment Tables (document reference 6.11.A2) (and any

				further environmental information – as detailed within ES Chapter 11: Historic Environment (document reference 6.11) and Table 1.1, regarding providing Historic Environment baseline and assessment following further evaluation)."
10.25	2.1.4 "*All heritage assets should be considered with appropriate weight, reflecting their value, which could be subject to change in the event of discovery of currently unknown archaeological remains or new information on known*	Please add in the following sentence to bullet point 2: · All heritage assets should be considered with appropriate weight, reflecting their value, which could be subject to change in the event of discovery of currently unknown archaeological remains or new information on known archaeological remains as a result of a programme of archaeological evaluation	Text edited as requested	We are happy with the inclusion of the edit we recommended. However, the below bullet point should be in the detailed methodology section, in relation to extension of agreed excavation/mitigation areas. This is not appropriate for defining

	archaeological remains"	(geophysical survey and trial trenching). This is to clarify the process.		mitigation areas from evaluation results: *"Mitigation areas will be designed to extend 10m beyond the extent of known assets (through either or both geophysical survey and archaeological trial trenching), unless the assets comprise structural remains or funerary activity, in which case the mitigation area will extend 20 m beyond the known extent of such remains."* So, where there is archaeology in trial trenching which requires further work, the limits of mitigation areas will be defined to the nearest blank trench beyond the identified archaeology. When a mitigation area has been opened and archaeology is shown to continue beyond the defined mitigation area, implementation of the above 10m/20m extension is applied until suitable clearance is achieved to define the archaeology. **NB.** This is constrained by the

				limits of development whether that be area of impact or order limit (whichever is smaller).
10.26	2.1.5 "*Only undertake extensive intrusive works in areas within the Order Limits where there would be a direct impact through development to archaeological remains"*	Please amend bullet point 5, to bring this point in line with EN01 5.9.12: · Only undertake extensive intrusive works in areas within the Order Limits where there would be a direct and/or indirect impact through development to archaeological remains. e.g. any areas where preservation of archaeological heritage assets by avoidance has been agreed and there is an indirect impact, such as drilling clay break out, or areas where a de-compaction strategy is required. Or areas where off site ecological compensation/BNG is agreed and would have a direct impact upon archaeological heritage assets.	Following edit made: Only undertake extensive intrusive works in areas within the Order Limits where there would be an impact through development to archaeological remains.	No further comment

10.26	2.1.5	There needs to be a bullet point for the AMS-OWSI and DWSIs linking to OLEMP, OCoCP, OCEMP, Overarching Soil Management Plan and any other project level environmental and/or construction management documents. This is to ensure control measures are coherent and easily cross-referenced. Archaeological mitigation should be included on live constraints mapping for the project. There should be the inclusion of a bullet point for public engagement and outreach.	Included reference to CoCP, soil management plans and LEMP. Outreach is referred to in paragraph 2.2.3	No further comment
	2.1.6 Following archaeological evaluation (geophysical survey, archaeological trial trenching and, where appropriate, geoarchaeological investigation), areas of the Project that prove to be archaeologically negative will not require mitigation and will be returned to National Grid.			This new paragraph is unclear, we would advise the following amendment to clarify this point: Following archaeological evaluation (geophysical survey, archaeological trial trenching and, where appropriate, geoarchaeological investigation), areas of the Project that prove to be archaeologically negative **and have been determined to not require further investigation/mitigation, these areas will be signed off by the relevant LPAAA** and will be returned to National Grid **to allow commencement of**

				development in these areas.
	2.1.7 Archaeological mitigation will not be required for post medieval field boundaries. Archaeological mitigation will also not be required for sparce undated pits, post-holes and gullies. Any such areas of the Project will be returned to National Grid.			2.1.7 should be replaced with the following: **"Areas of archaeological mitigation will be informed by the significance of archaeological remains indicated by the results of trial trench evaluation. Classes of archaeological features such as Post-medieval field boundaries which are recorded on 1st ed OS mapping and sterile pits (where they appear in isolation) are unlikely to require further mitigation"** The decisions of the mitigation areas need to be informed by the results of trial trenching.

	2.1.9 - Appendix B details the mitigation excavation areas thus far identified through the Priority geophysical and trial trenching surveys. The appendix is supported by Figure 2 – Archaeological Mitigation in the Priority archaeological trial trenching areas. The identification of the mitigation areas was based on the excavation of dated archaeological remains, or remains the morphology of which suggested occupational or funerary activity, that have the potential to further relevant research aims as identified in the East of England Regional Research Framework (EERRF) (Association of Local Government Archaeological Officers East of England and Historic England, 2000; 2011; 2021).			2.1.9 – These areas (Suffolk) have not been discussed with SCCAS. Areas of mitigation cannot be determined without full reports and therefore should be removed from the OAMS-OWSI. Mitigation areas should be defined in the Detailed Written Schemes of Investigation (DWSIs). The OAMS-OWSI is a control document and cannot define mitigation areas and would contradict the DCO requirement wording. As discussed with the applicant in an archaeological thematic meeting held 06/05/2026, the solution to undertaking works in the pre-commencement period is to include pre-commencement works in the archaeological DCO requirement wording (as has been followed by other NSIPs e.g SEAlink). Also, the research aims and objectives will change from those identified in the evaluation as archaeology is identified during the mitigation works.

	2.1.10			See above comment
	2.1.11 To avoid delays in, and to facilitate the construction phase of the Project, the mitigation of the temporary haul road, where it passes through the mitigation areas recorded in Appendix B, may have to be carried out in advance of the full excavation of the mitigation area(s). If this does occur, suitable safety considerations will be implemented to protect both the Main Works Contractor(s)' and the Archaeological Contractor(s)' staff and the measures taken will be recorded in the relevant DWSI.			2.1.11 – delays can be avoided when archaeology evaluation (geophysical survey and trial trenching) is completed prior to the commencement of authorised development. Where archaeology coincides with development, areas within the areas of archaeological mitigation as defined in the DWSIs can be brought forward and prioritised in sections to facilitate development.
2.2 Objectives				

10.27	2.2.2 · *"Ensure a detailed programme of archaeological work is in place to appropriately mitigate impacts on any archaeological remains due to the Project…*	We would recommend the following amendment to clarify the process: · Ensure a detailed programme of archaeological work is in place to appropriately mitigate impacts on any archaeological remains due to the Project, informed by archaeological evaluation (geophysical survey and trial trenching) for all areas of impact.	Text edited as requested	No further comment
	· *Ensure that the results of the investigations are:* — Made publicly available in an appropriate format for assimilation into the relevant Historic Environment Records (HERs) — Disseminated in a timely manner via the Online Access to the Index of Archaeological Investigations (OASIS) and the Archaeological Data Service — Disseminated through outreach during and post fieldwork where possible."	With the provision for public outreach there should be a methodology developed to enable effective public engagement. In previous projects of equivalent scale and complexity, the delivery of public outreach has been coordinated by a dedicated "Archaeological Outreach Officer". This individual has either been a part of the principal archaeological contractors' team or been directly employed by the developer. The Archaeological Outreach Officer can be an excellent source of positive engagement between developers of the scheme and the local community.	Paragraph 2.2.3 added	Paragraph 2.2.3 appears to be absent from the OAMS-OWSI
Table 2.1 Aims of Mitigation Techniques Proposed on the Project				

10.28	Table 2.1 **Ref 1**	Preservation in situ will need to be agreed and secured by creation of a separate management plan, this management plan will need to link to other documents such as the OLEMP and OCoCP and Soil Management Plan etc. The preservation in situ management plan would need to detail the preservation in situ of archaeology during, construction (including decommissioning of 132kV) and operation. The Preservation in situ management plan would also need to have sufficient provision to allow for archaeological mitigation should archaeological heritage asset be unable to be preserved in situ during construction and/or during its operation.	The Applicant will not commission the production of a Historic Environment Management Plan (HEMP) nor a Preservation In Situ Plan (PISP). Preservation in situ for appropriate assets will be achieved through the CoCP and the SSWSI. Once the land within the Project is handed back to the owners, the Applicant will no longer have any responsibilities regarding the ongoing preservation in situ of any asset.	This contradicts the dDCO requirement wording, which specifically requires the submission and approval of preservation in situ management plans. The CoCP is not an appropriate mechanism to deliver preservation in situ as it does not cover the post construction and decommissioning. Although we recognise that NG will not be responsible for sites following construction. There needs to be a mechanism in place to secure the protection of heritage assets from NG activities during the life of the scheme e.g. maintenance and repairs. As a minimum, the preservation in situ management plan should set out that NG will record the location of heritage assets which have been preserved in situ, and that any NG works required in these preservation in situ areas will elicit a programme of archaeological mitigation.

10.29	Table 2.1 **Ref 1.1 – Avoidance** "*Primarily achieved through design as embedded mitigation but can be recommended when significant archaeological remains are discovered during archaeological work or construction. The aim is to avoid damage to heritage assets by removing any potential impact.*"	Preservation in situ through avoidance will need to secure the production and the implementation of a Historic Environment management plan (HEMP). This would need to link into other management plans such as the CEMP and LEMP to ensure preservation of the archaeological heritage assets. This will also need to allow for monitoring of the preservation in situ areas by the Archaeological Clerk of Works and have sufficient provision to allow archaeological mitigation should preservation in situ not be achieved during construction or during operation such as repair works.	The Applicant will not commission the production of a Historic Environment Management Plan (HEMP) as set out at Deadline 3.	See comment on 10.28
10.3	*Table 2.1* ***Ref 1.2 - Burial or sealing of remains with barrier membrane***	This is no longer considered good practice. As a general principle, once archaeology has been exposed it will need to be mitigated as re-burial of exposed remains will not allow preservation in situ, as the burial environment will have changed. Depending on the buried heritage assets the use of barrier membrane may cause damage through altering water percolation through the burial environment and the introduction of Oxygen which will cause the degradation of artefacts and palaeoenvironmental remains.	Text edited with regard to Historic England guidance	This needs to be amended to stat that "**Appropriate assessment is required to determine if reburial will achieve preservation in situ."** This is in line with Historic England Guidance Historic England 2024 Preserving archaeological remains. Appendix 5 – The Reburial of archaeological sites. NB. The applicant must also consider that semipermeable membrane is also considered ground contamination as it is easily damaged and can rip and

				break. This may have implications on the project soil management plan as soil may be considered contaminated and need removal from site.
	Burying or sealing remains beneath fill material to ensure that they are not disturbed (including use of a protective barrier membrane between the buried remains and the fill material. The aim is to avoid damage to heritage assets by removing any potential impact.	If areas are temporarily built up, above topsoil/ploughsoil level, there will need to be sufficient testing to assess compaction/compression damage to archaeology as this depending on depth of the archaeological heritage assets can cause direct and indirect impact upon archaeological heritage assets, through compaction and plastic deformation to archaeological heritage assets. If areas are temporarily built up, then the decompaction methodology needs to be informed by the results of archaeological evaluation and mitigated appropriately ahead of implementation of a decompaction methodology.	Text edited with regard to Historic England guidance	This needs to be amended to stat that "**Appropriate assessment is required to determine if reburial will achieve preservation in situ."** This is in line with Historic England Guidance Historic England 2024 Preserving archaeological remains. Appendix 5 – The Reburial of archaeological sites.
10.31	*Table 2.1* ***Ref 1.3 Fencing*** *Measures for preservation in situ would include protective fencing. The aim is to avoid damage to heritage assets by removing the potential for unintended impacts*	In order to establish the extent of buried archaeological heritage assets archaeological evaluation including geophysical survey and trial trenching of a suitable sample percentage (typically 4% with geophysical survey and 5% without geophysical survey), would be required to inform on extent of archaeological heritage assets to be preserved in situ.	Following edit made: Measures for preservation in situ would include protective fencing. The aim is to avoid damage to heritage assets by removing the potential for unintended impacts. The extent of any given asset would need to be established through geophysical survey and	The applicant suggested wording is fine

			archaeological trial trenching prior to fencing.	
10.32	*Table 2.1* ***Ref 1.4 – Track matting*** *Where construction vehicle movements cannot be avoided, temporary track matting will be laid to spread vehicle loads, prevent rutting and minimise compression of the soil profile, thereby reducing the risk of harm to any buried archaeological remains.*	Use of track matting is fine where depth of soil coverage above archaeology is sufficient, however, preservation in situ cannot be achieved if remedial works such as decompaction will be utilised after the track matting has been removed. Where decompaction is required, the area will need to be mitigated appropriately ahead of implementation of a decompaction methodology.	No formal decompaction is planned. The land will revert to its original use e.g. arable and pastoral production.	This contradicts 5.3.17 of this OWSI. Which states: "*The location and type of ground cover mats for each site for preservation of archaeological remains will be set out in a DWSI (it may be helpful for the Archaeological Contractor(s) to combine various sites into a single DWSI). It will also set out whether any preliminary archaeological investigative work is required (before or during the installation or removal process or* **during any decompaction or soil remediation activity [emphasis added]).** *Requirements for archaeological investigation will be contained within the DWSIs."* Additionally, Document: 7.2 Outline Code of Construction

				Practive Appendix C – Outline Soil Resource Plan sets out soil management measures for the project and decompaction methodologies are in this document. Question: Is trackmatting for main construction vehicle movement or for vehicles working on the archaeological works? The applicant will need to ensure that track matting on topsoil is appropriate for large vehicle movements, with vehicles carrying 100s of tonnes of cables. There would be to many variables for the project engineers to sign off on its use for construction vehicle movement. If a topsoil strip is required to use track matting then this would impact the archaeology and preservation in situ would not be achieved.

10.33	*Table 2.1* ***Ref 2.1 - Geoarchaeological Deposit Modelling*** *May be used in conjunction with 4.4. Using existing information to map the distribution of buried deposits of archaeological interest across a site or landscape.* *Interpretation of when the deposits accumulated and what they represent allows areas of archaeological potential to be identified. The aim is to enable subsequent fieldwork to be focused and/or the context of archaeological remains to be better understood.*	This should also include palaeoenvironmental assessment and C-14 dating, as there are known organic rich deposits and peats within the river valleys. This is essential to inform on the palaeoenvironmental potential, significance and date of these deposits to inform the scheme design and an appropriate mitigation strategy.	C-14 dating is covered in 4.4	4.4 is substations. In the OWSI scientific dating is covered in pragraphs 5.3.103 – 107. There is no reference to the use of scientific dating and its use for geoarchaeological and geoarchaeological deposit modelling. Provision for this must be included in the OWSI scientific dating section. 5.3.14 should include the statement "Appropriate scientific dating will be applied to deposits recovered as samples taken during geoarchaeological works to inform on significance of those deposits e.g. C-14 dating for organic deposits.

10.34	*Table 2.1* ***Ref 3.1 – Controlled metal detecting*** *The systematic metal detecting of a given area of archaeological investigation to allow the plotting and recording of any metalwork. controlled metal detecting will be undertaken on all areas designated for archaeological mitigation prior to the excavation areas being opened. Detecting will be completed after any surface clearance and prior to any hand excavation of archaeological features. There are two aims, firstly to create a record of the distribution of archaeological artefacts within the ploughzone, to advance understanding of the value of the archaeology of a given area and to inform the development of further mitigation, and secondly to recover any archaeological metalwork from topsoil during intrusive archaeological fieldwork.*	*this should also include that controlled metal detecting will be undertaken on areas of archaeological mitigation, prior to the excavation areas being opened. Please include:* *controlled metal detecting will be undertaken on all areas designated for archaeological mitigation prior to the excavation areas being opened. Detecting will be completed after any surface clearance and prior to any hand excavation of archaeological features.*	Following edit made: The systematic metal detecting of a given area of archaeological investigation to allow the plotting and recording of any metalwork. Controlled metal detecting will be undertaken on all areas designated for archaeological mitigation prior to the excavation areas being opened. Detecting will be completed after any surface clearance and prior to any hand excavation of archaeological features. There are two aims, firstly to create a record of the distribution of archaeological artefacts within the ploughzone, to advance understanding of the value of the archaeology of a given area and to inform the development of further mitigation, and secondly to recover any archaeological metalwork from topsoil during intrusive archaeological fieldwork.	No further comment

10.35	*Table 2.1* ***Ref 3.2 – Geophysical survey*** *A non-intrusive archaeological survey technique used to identify differences between buried archaeological remains and surrounding soil. The purpose of this is to understand likely presence, extent and nature of buried archaeological remains.*	The AMS-OWSI should acknowledge that geophysical survey is not a definitive evaluation technique and should clearly state that without "ground truthing" the results it is difficult to interpret the data. Only features with sufficient magnetic contrast will register within the data, and interpretation of these results is inherently subjective. Additionally, the lack of a detectable anomaly within the survey does not guarantee an absence of archaeology, nor can the survey alone establish the precise character, date or extent of features it does identify. The AMS-OWSI should clearly state that not all areas of the Order Limits have been surveyed and on the areas that have been surveyed only magnetometer survey was undertaken. No other geophysical techniques have been deployed. The results presented therefore relate exclusively to magnetometer data and without "ground truthing" the results should not be interpreted as a comprehensive geophysical characterisation of the site.	Following edit made: A non-intrusive archaeological survey technique used to identify differences between buried archaeological remains and surrounding soil. The purpose of this is to understand likely presence, extent and nature of buried archaeological remains. Magnetometer survey is the sole method employed by the project due to its rapid, cost effective, non-invasive approach to archaeological prospection and its ability to detect geological, archaeology, or modern anomalies. These benefits outweigh the limitations of the method to identify small ephemeral features, or ones that lack a distinctive magnetic signature.	This should state that trial trenching is required to ground-truth the geophysical survey results.

10.36	Table 2.1 **Ref 4.1 – Trial trenching** This comprises the machine excavation of trenches and investigation by hand of identified archaeological remains. The aim is to determine the presence or absence of archaeological deposits, their state of preservation and to inform the development of further mitigation.	SCCAS would recommend the following amendment: *"This comprises the machine excavation of trenches and investigation by hand of identified archaeological remains. The aim is to determine the presence or absence, significance, extent, depth and character of archaeological heritage assets as well as their state of preservation. To inform the development of a programme of appropriate archaeological mitigation."* This amendment clarifies the objectives of archaeological trial trenching.	Text edited as requested	No further comment
10.37	Table 2.1 **Ref 4.2 – Detailed excavation** *A programme of controlled, intrusive fieldwork with defined objectives which maps, examines, records and interprets archaeological remains at a site or within a specified area. The aim is to create a record of any archaeological remains before they are lost, wholly or in part, to advance understanding of the value of the archaeological assets.*	We would recommend the following amendment: "A programme of controlled, intrusive fieldwork which maps, investigates through hand-excavation and post-excavation analysis, records and interprets archaeological remains at a site or within a specified area. The aim is to create a complete record of any archaeological remains before they are lost, wholly or in part, to advance understanding of the value of the archaeological assets." This amendment clarifies the objectives of detailed excavation.	Text edited as requested	No further comment

10.38	Table 2.1 **Ref 4.3 – Strip, Map and sample excavation** *Strip, map and sample comprises the archaeologically controlled strip of a defined area within the Order Limits under the direction of a suitably qualified archaeologist. The aim is to create a record of any archaeological remains before they are lost, wholly or in part, to advance understanding of the value of the archaeological assets.*	SCCAS would recommend the following amendment in red: "Strip, map and sample comprises the archaeologically controlled strip of a defined area within the Order Limits under the direction of a suitably qualified archaeologist. The exposed archaeology will then be planned, and the level of hand-excavation will be determined in consultation with the LPAAA. The aim is to create a record of any archaeological remains before they are lost, wholly or in part, to advance understanding of the value of the archaeological assets. Strip Map and Sample mitigation should only be applied to areas where the archaeological evaluation has indicated the presence of lower value archaeological heritage assets which are spread over a larger area, e.g. Prehistoric Field Systems. This mitigation methodology should not be applied to areas of occupation, industry or burial. Where SMS mitigation identifies areas of higher archaeological value than anticipated the SMS methodology should be changed to a detailed excavation methodology.	Text edited as requested	No further comment

10.39	*Table 2.1* ***Ref 4.4 Geoarchaeological and palaeoenvironmental investigation*** *May be used in conjunction with 2.2 (Geoarchaeological deposit modelling). A programme of sample recovery and assessment/analysis carried out to investigate palaeoenvironmental conditions and soil sediment development that may be relevant to the research of archaeological sites or remains found within the vicinity. Achieved through trial pit excavations or other soil sample retrieval methods (such as auger or boreholes). The aim is to provide additional information and context to any archaeological remains before they are lost, wholly or in part, to advance understanding of the value of the archaeological assets.*	This should be included in 2.1 as palaeoenvironmental and geoarchaeological assessment as it sets out the assessment criteria. SCCAS would recommend the following amendment in red: Will be used in conjunction with 2.1 (Geoarchaeological deposit modelling). A programme of sample recovery and assessment/analysis/scientific dating carried out to investigate palaeoenvironmental conditions, significance of deposits, organic artefact preservation, and soil sediment development that may be relevant to the research of archaeological sites or remains found within the vicinity, and the broader palaeoenvironment. Achieved through trial pit excavations or other soil sample retrieval methods (such percussion auger or boreholes to provide sleeved samples for full analysis). The aim is to provide ~~additional~~ sufficient information and context to any archaeological remains before they are lost, wholly or in part, to advance understanding of the value of the archaeological assets, and to inform the broader understanding of palaeoenvironmental conditions in the region. This will also inform on the potential for	Text edited as requested	No further comment See comment on 5.3.14

		organic artefact preservation within deposits.		
	Table 2.1 Ref 4.4 Geoarchaeological and palaeoenvironmental investigation	For Geoarchaeological and palaeoenvironmental **mitigation**, this section needs to set out mitigation measures informed by the results of palaeoenvironmental and geoarchaeological assessment.	This section of the AMS sets out the aims of the project. Mitigation is set out in section 5.3	This is confusing as there is a column called mitigation method for the table. For geoarchaeological and palaeoenvironmental mitigation you need to state that "mitigation will be informed by the results of the assessment"

10.4	*Table 2.1* ***Ref 5.1 – Archaeological Monitoring and Recording*** *A programme of observation of soil stripping by machine for construction works and where required the investigation and recording of archaeological remains. To be carried out in specific areas where the presence of, or moderate potential for, archaeological remains has been demonstrated or can be predicted. The aim is to create a record of any archaeological remains before they are lost, wholly or in part, to advance understanding of the value of the archaeological assets.*	Archaeological monitoring and recording should be confined to minor, unassessed interventions, such as supervising ground-investigation test pits. Where a project area shows clear archaeological potential (indicated by baseline information or through archaeological evaluation), more comprehensive evaluation and mitigation, like targeted excavation or strip, map and sample excavation, to ensure appropriate archaeological mitigation. When monitoring reveals archaeological assets of potential significance, the approach must be escalated according to the nature and importance of those finds. E.g. progress to opening an excavation area to allow Detailed Excavation for heritage assets of significant archaeological interest. **Risks and Project Implications** · Monitoring and recording during construction is inherently high risk, as unexpected discoveries will halt works. · Discovery of significant archaeology during construction may force redesigns or additional fieldwork, impacting project timelines. · Unexpected and unplanned-for mitigation can drive up costs and delay project delivery. Therefore, archaeological monitoring and recording should only be reserved for very	Text edited as requested	No further comment

		specific situations. Instead, SCCAS recommends a comprehensive evaluation of all scheme impacts, combining geophysical survey with trial trenching, to inform the development of the archaeological potential of areas of impact. This full assessment not only shapes effective archaeological mitigation strategies but also provides reliable data for realistic project delivery timelines and cost forecasts. **We would recommend a complete re-write of this to the following:** For small, defined, construction impacts, where archaeological potential is low an archaeological monitoring and recording programme may be implemented. This will: • Provide continuous archaeological oversight of all relevant groundworks. • Require an immediate halt to construction if remains are uncovered, allowing for careful hand-excavation and comprehensive recording. • Trigger an escalation protocol, informing the relevant LPAAA if discoveries prove more extensive or significant than anticipated. Any upgrade to a more robust mitigation strategy will be agreed with the relevant LPAAA and in discussion with project stakeholders to ensure heritage assets are properly investigated and documented before development resumes.		

10.41	*Table 2.1* ***Ref 6.2 - Outreach activities*** *This could include presentations, talks, public events and exhibitions*	Outreach activities can span traditional and digital channels, including: · Presentations, talks, public events and exhibitions · Maintenance and enhancement of digital outreach platforms · Engagement with media partners, such as documentaries or features on Digging for Britain	Text edited	No further comment
10.42	*Table 2.1* **Ref 7 – Post-excavation**	**Note:** Please ensure that funding is available to allow for the off-site processing finds and stabilizing sensitive materials during the fieldwork phase, as this is essential to ensure their conservation.	Noted	Can you link to the relevant section in the OWSI.
10.43	*Table 2.1* ***Ref 7.1- Conservation and assessment*** *A programme of post-excavation assessment, conservation and reporting would be carried out.*	*We would recommend the following amendment to provide clarity to the post-excavation assessment process:* *"A programme of post-excavation assessment, conservation and reporting would be carried out and presented in Post-Excavation Assessment Reports (PXA). An Updated Project Design must be developed from the PXA's detailing a programme of full post-excavation analysis, reporting, publication and archive deposition."*	Text edited as requested	No further comment

10.44	*Table 2.1 7.2* ***Analysis and Reporting*** *Archaeological post-excavation analysis (including but not limited to, finds analysis, environmental sample analysis, Carbon 14 and Optically Stimulated Luminescence (OSL) dating and other specialist inputs), and reporting.*	Further detail should be included in this summary, we would recommend the following amendment: A programme of post-excavation analysis will be undertaken, which will include (but not limited to): · Finds Analysis, · Environmental Sample Analysis, · Appropriate Scientific Dating, · Bayesian Modelling, · Human remains and faunal remains analysis, · and other specialist input and reporting. These specialists' analysis will be reported in Post-Excavation Assessment reports and inform the production of an Updated Project Design (UPD), detailing further analysis, publication, outreach and deposition of archives.	Text edited as requested	No further comment

10.45	*Table 2.1* ***Ref 7.3 – Archiving*** *The deposition of the archive in an approved local museum or other repository, and the creation of an appropriate digital archive.*	We would recommend the following amendment to this summary: "The deposition of the archive in an approved local museum or other repository, in accordance with local archival guidance and the creation of an appropriate digital archive to be deposited with the Archaeological Data Service (ADS). All archives (both physical and digital) will be accompanied by an appropriate archive report and GIS shapefiles provided for inclusion in the County Historic Environment Record" **Note:** Archive deposition charges will apply; these must be agreed with the local archive repository in advance of deposition and detailed in the Updated Project Design (UPD). For Suffolk the archive repository is the Suffolk County Council Archaeology Store in accordance with national and local guidance (there are no museums with capacity to take an archaeological archive in Suffolk), and the Suffolk archive deposition charges are payable at the PXA/UPD submission. SCC County Archaeology Store can only store the archive generated within the County. We cannot accept archive material from other counties.	Text edited as requested	No further comment

10.46	*Table 2.1* ***Ref 8.1 – Publication*** *Publication of the results in appropriate formats including academic and more popular publications.*	Please see SCCAS recommendation in red below: Provision for publication of the results of archaeological fieldwork will be proportionate to the significance of the archaeology recorded, and published in appropriate nationally recognised academic journals e.g. East Anglian Archaeology (EAA). In addition, more popular publications may be produced as part of the programme outreach. Note: As a minimum, summaries of the archaeological work undertaken within Suffolk must be provided for inclusion in the Proceedings of the Suffolk Institute for Archaeology.	Text edited as requested	No further comment
10.47	3.1.3 *"The research framework relevant to the Project is the East of England Regional Research Framework (EERRF) (Association of Local Government Archaeological Officers East of England and Historic England, 2000; 2011; 2021)."*	Please include a reference to the East of England Regional Research Framework website (https://researchframeworks.org/eoe/). This online resource lays out period-specific research agendas (each framed by specific research questions) and is complemented by overarching, multi-period research questions. As a live, web-based document, it's regularly updated to reflect the latest archaeological investigations, discoveries and evolving research priorities.	Text edited	No further comment

10.48	*3.1.5* *"The EERRF, desk-based studies, geophysical surveys and the results of the archaeological trial trenching would be used to inform specific research questions for the Project, in consultation with key stakeholders, and would be set out in the DWSIs."*	Please remove "specific" and replace with initial, as research questions can change during the mitigation/excavation process. This work will be guided by initial research questions, which may be refined as archaeological work progress, ensuring that final reporting and publication is proportionate to the significance of the archaeological heritage assets affected by the development.	Text edited as requested	No further comment
10.49	3.1.6 "Each DWSI for areas of archaeological interest would be prepared substantially in accordance with this document, which is secured through Draft DCO Requirement 5 (document reference 3.1), and would clearly identify research objectives and approaches which would contribute to meeting those objectives."	The research objectives for each DWSI will only be fully understood once **Post-Excavation Assessment reporting** has been undertaken and the research objectives of the project would be defined in an Updated Project Design. "Each DWSI for areas of archaeological interest would be prepared substantially in accordance with this document, which is secured through Draft DCO Requirement 5 (document reference 3.1), and would identify initial research objectives and approaches which would contribute to meeting those objectives."	Text edited as requested	No further comment

10.5	4.1.4 "*As the construction of the temporary construction compounds would require removal of soil there is potential for physical impacts to archaeology located within these areas. The construction techniques are expected to affect near-surface archaeology with no impacts expected to deeply buried deposits. On the basis of current construction information it is not expected that the static load or vehicle movements within temporary construction compounds would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI.*"	In areas containing waterlogged and/or organic-rich sediments, appropriate archaeological evaluation must be undertaken to assess the potential impact on stratified deposits. This is essential to ensure that any significant palaeoenvironmental or archaeological remains are identified and appropriately mitigated prior to development. While **no impacts are currently anticipated** on deeply buried archaeological deposits, this assumption **must be verified through archaeological evaluation**. Archaeological evaluation, combining geophysical survey and trial trenching, is necessary to confirm the presence or absence of archaeological heritage assets, and inform on the significance of archaeological remains and to ensure appropriate mitigation is applied, if required.	Text edited	Amended text is agreeable.
4.2 Haul Roads				

10.51	*4.2.9* *"Temporary crossings would be required over watercourses, streams, and field ditches to maintain the haul roads along the alignment; these would likely consist of temporary bridges or culverts. Further detail is included in ES Appendix 4.2: Watercourse Crossing Details (document reference 6.4.A2)."*	Watercourses and streams where temporary crossings will be required will need archaeological evaluation and **palaeoenvironmental assessment** to inform design. e.g. impacts could be large if Water Vole mitigation is required.	Text edited	No further comment
10.52	*4.2.10* *"As the construction of the haul roads would require removal of soil there is potential for physical impacts to archaeology located within these areas. The construction techniques are expected to affect near-surface archaeology with no impacts expected to deeply buried deposits. On the basis of current construction information it is not expected that vehicle movements on the haul roads would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the*	While **no impacts are currently anticipated** on deeply buried archaeological deposits, this assumption **must be verified through archaeological evaluation**. Archaeological evaluation, combining geophysical survey and trial trenching, is necessary to confirm the presence or absence of archaeological heritage assets, and inform on the significance of archaeological remains and to ensure appropriate mitigation is applied, if required.	Text edited	Amended text is fine, no further comment.

	depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI."			
4.3 Overhead Lines				
10.53	*4.3.4* *"As the construction of the pylons and surrounding working areas would require removal of soil there is potential for physical impacts to archaeology located within these areas. The construction techniques are expected to affect near-surface archaeology with potential for impacts to deeply buried deposits in the locations of the pylon foundations. On the basis of current construction information it is not expected that the static load or vehicle movements within pylon*	Archaeological evaluation should be undertaken to inform appropriate mitigation strategies for each pylon location and its associated working area. In addition, any geotechnical investigations should be archaeologically monitored by a suitably qualified geoarchaeologist. This will help assess potential impacts on deeply buried deposits and inform the development of appropriate mitigation measures	Noted	We would advise the following amendment, as this 4.3 does not specifically state that archaeological trial trenching will be carried out: **4.3.4** *As the construction of the pylons and surrounding working areas would require removal of soil there is potential for physical impacts to archaeology located within these areas. The construction techniques are expected to affect near-surface archaeology with potential for impacts to deeply buried*

	working areas would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI."			*deposits in the locations of the pylon foundations.* **An archaeological trial trenching will be undertaken prior to construction to inform a programme of archaeological mitigation.** *On the basis of current construction information it is not expected that the static load or vehicle movements within pylon working areas would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI.* **NB.** The use of piles or other intrusive stabilisation mechanisms would affect deeply buried archaeological deposits as this introduces oxygen and changes the chemical stability of those environments. Therefore, where these are proposed, an assessment of impact needs to

				be made.
10.54	*4.3.6* *"Other elements of the works to construct the pylons and install the conductors are not expected to cause any below ground impacts as there would be no requirement to break ground in new areas."*	Archaeological evaluation will be required to inform on the impacts of the development.	Noted	
4.4 Substations				

10.55	4.4.2 "*As the construction of the substation would require removal of soil there is potential for physical impacts to archaeology located within these areas. The construction techniques are expected to affect near-surface archaeology with potential for impacts to deeply buried deposits in the locations of any piling works. On the basis of current construction information it is not expected that the static load or vehicle movements within other parts of substation working areas would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI.*"	While **no impacts are currently anticipated** on deeply buried archaeological deposits, this assumption **must be verified through archaeological evaluation**. Archaeological evaluation, combining geophysical survey and trial trenching, is necessary to confirm the presence or absence of archaeological heritage assets, and inform on the significance of archaeological remains and to ensure appropriate mitigation is applied, if required.	Text edited	No further comment
4.6 Underground Cables				

10.56	*4.6.5* *"As the construction of the underground cable and working area would require removal of soil there is potential for physical impacts to archaeology located within these areas. The construction techniques are expected to affect near-surface archaeology with no impacts expected to deeply buried deposits. On the basis of current construction information it is not expected that the static load or vehicle movements within the construction swathe for underground cables would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI."*	Document 6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design indicates that the proposed open-cut construction will occur within areas of high palaeoenvironmental value. As such, there is potential for both direct and indirect impacts on significant palaeoenvironmental sequences and associated archaeological heritage assets. To appropriately assess and mitigate these potential impacts, a**rchaeological evaluation and palaeoenvironmental assessment will be required.** These investigations will inform the development of suitable mitigation strategies to ensure the protection and understanding of the buried historic environment	Text edited	*As the construction of the underground cable and working area would require removal of soil there is potential for physical impacts to archaeology and, in some cases, palaeoenvironmental deposits located within these areas.* *The construction techniques are expected to affect near-surface archaeology with no impacts expected to deeply buried deposits. On the basis of current construction information it is not expected that the static load or vehicle movements within the construction swathe for underground cables would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI.* We do not believe this statement is accurate particularly for the

				river valleys, facilitating measures such as de-watering will have widespread impact on palaeoenvironmental deposits to significant depth. Please speak to Historic England regional Science advisor - Zoe Outram.
10.57	*4.6.8 "The underground cable would be installed using a drilling or boring method (or a suitable alternative method) to pass beneath features. There are different trenchless methods that could be used, and each method would have a different construction footprint (all of which could be accommodated within the Order Limits). Depending on the technique, there may be a need to undertake several passes to make the hole wide enough to allow the ducts (pipes) to be pulled through."*	Document 6.9.A4 – Hydrological Risk Assessment states that HDD is not suitable due to the nature of the sub-surface geology and has proposed a boring method of micro tunnelling. There is confusion when you discuss features, are you describing geological features or archaeological features? There are deep deposits of peat and alluvium within the Stour River Valley, the significance of which is currently unknown as no palaeoenvironmental assessment has been undertaken. The trenchless crossing design will need to be informed by appropriate archaeological assessment. This section will need amending in	Text edited	Section 4.6 does not currently provide sufficient clarity or evidence regarding the archaeological implications of the proposed underground cable installation. In particular, the assessment appears to rely on generalised assumptions about the ability of trenchless techniques to avoid archaeological impacts, without demonstrating that the proposed methods, depths, ground conditions, hydrological effects and engineering design would preserve archaeological and palaeoenvironmental remains in situ.

		consultation with the design engineers.		Paragraphs 4.6.7 to 4.6.14 appear to treat trenchless installation as a means of avoiding archaeological impact by passing beneath archaeological features. However, this conclusion has not yet been demonstrated. The method, depth, footprint, ground conditions, hydrological effects and engineering design are not yet fixed. Organic deposits of currently unknown significance are also known to be present within the area potentially affected by the proposed works. As a result, it is not currently possible to conclude that archaeological or palaeoenvironmental remains would be preserved in situ or avoided. Preservation in situ cannot be assumed simply because a cable is proposed to pass beneath archaeological remains. It requires evidence that the remains, organic deposits, and their burial environment would not be harmed by direct or

				indirect impacts, including: • launch and reception pits • drilling or boring alignment • multiple reaming passes • settlement or collapse • dewatering • hydrological change • changes to groundwater conditions or oxidation of organic deposits • drilling slurry breakout or frac-out • access routes and working areas • ground improvement or temporary works, and • fallback or alternative methods if HDD or another trenchless technique proves unsuitable

				Historic England guidance recognises that construction over, around or beneath archaeological remains can still harm through direct physical impacts or changes to the burial environment, particularly where waterlogged, deeply buried or palaeoenvironmental deposits may be present. The assessment should therefore set out how both physical and environmental impacts would be assessed and where possible avoided. Paragraphs 4.6.5 and 4.6.6 are broadly consistent with a mitigation-by-record approach for near-surface archaeology. However, the conclusion that deeply buried deposits would not be affected should be clearly evidenced through geoarchaeological deposit modelling, geoarchaeological investigation, palaeoenvironmental assessment and detailed construction information. At present, that information is incomplete. Section 4.6 should therefore make clear that further

				investigation is required before the programme of archaeological mitigation can be determined. Paragraph 4.6.8 states that the underground cable would be installed using a drilling, boring or suitable alternative method to pass beneath archaeological features. It also acknowledges that different trenchless methods could be used, each with a different construction footprint, and that several passes may be required. This introduces uncertainty. Where preservation in situ is being relied upon, the assessment needs to demonstrate that the selected method, alignment, depth and working areas would avoid harm to archaeological remains/deposits and their preservation conditions. Paragraph 4.6.9 acknowledges that trenchless installation can be technically challenging in unsuitable geology. However, that acknowledgement increases archaeological concern. If ground conditions are unsuitable, there

				may be increased risk of method change, additional passes, settlement, drilling fluid loss, frac-out/slurry breakout, or the need for alternative trenchless or open-cut interventions. These scenarios could all have archaeological implications and should be assessed. Paragraphs 4.6.10 and 4.6.11 identify dewatering, over-pumping, loss of drilling fluids and breakout of fluids as potential risks. These matters are directly relevant to archaeological preservation, particularly where waterlogged deposits or palaeoenvironmental sequences may be present. The assessment should therefore explain how hydrological change, dewatering and drilling slurry breakout have been considered in archaeological terms, rather than relying solely on assessment within contaminated land, geology and hydrogeology submissions. Paragraph 4.6.12 also introduces uncertainty because the number

				and location of trenchless crossings remain subject to micro-siting and further engineering design, therefore the archaeological impacts cannot be fully understood. Any micro-siting should be informed by archaeological further evaluation and assessment to inform mitigation. Paragraph 4.6.13 acknowledges that drilling slurry breakout could occur but states that archaeological mitigation in advance is not proposed because the risk is considered unlikely. This does not adequately address the potential archaeological consequences of a breakout, particularly for near-surface archaeology, waterlogged remains or palaeoenvironmental deposits. A specific archaeological contingency procedure separate from those proposed in GH12 should be secured for trenchless crossing locations where preservation in situ is determined to be achievable. This should include monitoring, reporting, emergency

				response, archaeological investigation and remediation measures in the event of slurry breakout, frac-out or other unexpected ground disturbance. Paragraph 4.6.14 should be amended to make clear that any conclusions regarding deeply buried deposits are **provisional** until informed by geoarchaeological investigations, deposit modelling, palaeoenvironmental assessment and further ground investigation works. Where deeply buried or waterlogged deposits are identified, the trenchless design should demonstrate that both direct and indirect impacts, including hydrological change and drilling fluid loss, would be avoided. The position is particularly concerning in relation to the Stour crossing. The Hydrological Risk Assessment indicates that the western cable corridor may be unsuitable for HDD and that the eastern corridor may only be possible. This creates a high-risk

				scenario for archaeology. If ground conditions prove unsuitable, there is potential for construction difficulties, changes to the crossing method, additional drilling passes, frac-out, settlement, or alternative trenchless/open-cut interventions. These could all affect archaeological features and deposits. Overall, the wording in section 4.6 appears to assume that boring beneath archaeological features would avoid harm. That has not yet been demonstrated. Near-surface archaeological remains may still be affected by launch and reception pits, working areas, access routes, dewatering, settlement, drilling fluid breakout or contingency works if the trenchless method proves unsuitable. Section 4.6 should therefore be revised to state that archaeological impacts cannot yet be determined until the trenchless design, ground investigation works,

				geoarchaeological investigations and palaeoenvironmental assessment have been completed. These works should inform the significance and sensitivity of any deposits present and enable appropriate archaeological mitigation and contingency measures to be designed.
10.58	*4.6.13* *"The construction methods for trenchless installation of underground cable are not expected to affect near surface archaeology in normal working, with the exception of the drive and reception locations. In these locations impacts to both near surface and deeply buried archaeological deposits could occur, due to construction passing through the full stratigraphy to reach the required depth.* ***Within the trenchless crossing there is the possibility of a drilling slurry breakout. However, this is considered to be unlikely with the proposed mitigation***	**SCCAS does not agree** with the current assessment regarding trenchless river crossings. No palaeoenvironmental assessment has been undertaken to inform the suitability of the proposed design**. Document 6.9.A4 – Hydrological Risk Assessment** identifies the instability of underlying deposits, which significantly increases the risk of drilling slurry breakout during trenchless construction. Such an event would have catastrophic consequences for organic-rich deposits of archaeological and palaeoenvironmental significance. Without appropriate assessment, these sensitive and irreplaceable deposits would be at risk of irreversible.	The Applicant believes SCCAS have overstated the risk of slurry breakouts. The Hydrological Risk Assessment states the risk of break our as Low to Moderate and also states that the risk could be lower than assessed and the risk only exists in the White Chalk sub-group. Commitments GH11 and GH12 present mitigation for breakouts. AMS text updated to include reference to GH11 and GH12	Comment for 4.6: 6.4.A4 - Hydrological Risk Assessment Does not state that the risk of break out as Low to moderate, it states that the risk of breakout impacting water quality in the chalk aquafer is moderate – low. See below extract from document: *"The principal risk associated with the proposed trenchless crossings is considered to be the creation of suspended sediment which could create turbidity impacts in the White Chalk Subgroup. This could affect water*

	of these risks and consequently archaeological mitigation in advance is not proposed. The trenchless crossing locations are subject to geophysical survey and archaeological trial trench evaluation to ensure the character and extent of any archaeology in these locations is understood [emphasis added]. *This would inform any potential mitigation requirements in the event of a drilling slurry breakout."*	To ensure the protection of sensitive palaeoenvironmental deposits, the design of trenchless crossings must be informed by palaeoenvironmental assessment. This should include the use of sleeved cores to enable detailed stratigraphic analysis and scientific dating of buried sequences. Such work must be undertaken in consultation with the **Historic England Regional Science Advisor** to ensure that appropriate methodologies are applied and that maximum information is recovered to inform both mitigation and design decisions.		*quality in the PWS abstractions within SPZ1 and 2 during the construction phase. However, at both sites, the trenchless crossings are not anticipated to go through the Chalk. In the absence of the Thanet Formation and Lambeth Group at the western cable corridor,* ***there is a slightly greater probability that this pollutant linkage could occur. Despite the greater probability, the potential risks are considered to be moderate / low at both cable corridors [emphasis added]."*** The report goes on to state on page 27: *"Where the superficial deposits lie directly above the Chalk without the presence of the TALM, this may pose as a hazard from a tunnelling perspective[15]. This is mainly because soft and loose deposits in superficial deposits can lead to poor tunnelling navigation and stability. Within these soft deposits there is the risk that*

				during reaming (enlarging the hole), the tunnel bore may not stay open. Granular deposits such as gravels may form over breaks (over excavation around the bore) during progression and lead to a loss of drilling fluid through the permeable matrix. Loose sand below the groundwater level is considered to present major difficulties as ground may flow into the bore." And on page 28: *"At the western cable corridor, HDD may be considered unsuitable due to the loose and soft superficial deposits. It is likely that direct pipe or pipejacking would be required for this trenchless crossing.* *In further stages of the design, the risk of an infilled channel of RTD will need to be considered in the eastern cable corridor. Design of the trenchless crossing methodology should consider frac-out[3] and river contamination when determining the depth of the crossing. In terms of settlements, the environmental*

				impact of a potential bore collapse should also be considered. *[3] Frac-out is the unintentional loss of drilling fluids to the ground surface during HDD. It can occur due to excessive downhole pressure, or when fluids penetrate a preferential seepage pathway (eg. faults, fractures, infrastructure or loose material). These fractures can be natural or induced by over-pressuring of materials."* It is SCCAS's interpretation of this information that frac-out is likely in the Western crossing, due to the presence of lose unconsolidated and soft deposits. Drilling under archaeology archaeological remains in a location which presents a moderate to high likelihood of frac-out does not achieve preservation in situ. Particularly in relation to sensitive organic and palaeoenvironmental remains. SCCAS would therefore

				recommend archaeological mitigation of the near-surface archaeology to mitigate this impact. To date there has been no assessment the significance of superficial deposits in the river valleys, which include extensive alluvial sediments, including peat formations. SCCAS advice a post-consent programme of geoarchaeological and palaeoenvironmental work to determine significance of these deposits, which will inform an archaeological risk assessment of the river crossing and appropriate mitigation. Which should form part of the assessment required under GH11 in the OCoCP.
10.59	*4.6.14* *"The construction techniques have potential to affect deeply buried deposits depending on the potential identified by geoarchaeological monitoring of the ground investigation works in these locations. In most cases it is assessed that the depth is great enough to avoid*	Further assessment is required to establish the significance of the paleoenvironmental deposits identified at these locations. This should include the extraction of sleeved cores to facilitate detailed stratigraphic analysis and enable scientific dating techniques.	text not updated as the conclusion of the sentence is that the deposits will be avoided	The paragraph contradicts itself. Peat was present in the trenches at a depth less than 1m, how can this paragraph be correct? This should be amended to: *"The construction techniques have potential to affect deeply buried deposits depending on the*

	impacts to even deeply buried deposits."			*potential identified by geoarchaeological monitoring of the ground investigation works in these locations.* ~~In most cases it is assessed that the depth is great enough to avoid impacts to even deeply buried deposits.~~ **A programme of geoarchaeological and palaeoenvironmental investigation will be required to establish the suitability of the technique in this location and any mitigation measures that may be required.**
4.7 Modifications and Removal of Existing National Grid Pylons				

10.6	*4.7.2* *"Where pylons are proposed to be removed, it may be necessary to establish a 60 m x 60 m working area. Typically, this area would not be stoned; instead, if ground conditions are poor, trackway may be used. Removal of pylons would involve removing the conductors by lowering cut sections to the ground, then lowering the insulators and fittings to the ground. Where a pylon is in a clear area and it is safe to do so, the pylon would be removed by 'felling' the whole structure. Alternatively, a mobile crane would be used to remove the structure in sections which would then be lowered to the ground. Once dismantled, the pylon steelwork would typically be broken up on site then removed. The reinforced concrete foundation would then be removed typically to a depth of 1.2 m below ground level. The excavation would then be backfilled and the ground reinstated and any waste removed from site to a suitable*	The felling of pylons is likely to have a direct impact on archaeological remains through both ground compaction and physical penetration of subsurface deposits. Compaction effects may include the crushing or distortion of fragile features such as postholes, hearths, or buried soils, as well as the displacement or fragmentation of artefacts within the stratigraphy. In waterlogged or soft sediments, compaction can also lead to the irreversible collapse of organic remains, including preserved timbers, peat layers, or palaeoenvironmental deposits, compromising their integrity and interpretive value.	Noted	Please insert: **Removal of the pylons by "felling method" could significantly disturb near-surface geology and archaeological remains. Therefore, the intended fall zone should be archaeologically evaluated before this removal method is used.**

	licensed waste management facility."			
10.61	*4.7.3* *"The removal of existing pylons is not expected to cause new impacts to archaeology as the works areas would have been affected by construction of the pylons, and if archaeology were present it would have been removed at this time."*	SCCAS disagree with this paragraph. As detailed in 4.7.2 the deconstruction of existing pylons has the potential to impact archaeology through compaction and penetration during the felling process. See comments on 4.7.2	the applicant believes that there is insufficient risk to the historic environment from the dismantling of pylons to warrant the inclusion of specific mitigation measures in the AMS.	SCCAS acknowledge that the area of concrete foundation of existing plyon will have removed archaeology. However, archaeological evaluation must be undertaken for areas of haul roads, access, laydown areas, crane base and pylon felling area. SCCAS would therefore recommend the following: "**Archaeological evaluation and where appropriate mitigation, is required for all areas of impact, including haul roads, access,**

				laydown areas, crane base and pylon felling area."
10.62	4.7.4 "Archaeological impacts related to construction of new/temporary pylons and underground cable are as described for those works above."	There are no details regarding temporary pylons.	The temporary pylons are for the diverted/ undergrounded UKPN 132kV lines. Currently the Applicant does not know the exact location along the line of the temporary pylons and so it has not been possible to design evaluation works.	Add this statement into the AMS-OWSI: "The temporary pylons are for the diverted/ undergrounded UKPN 132kV lines. Currently the Applicant does not know the exact location along the line of the temporary pylons and so it has not been possible to design evaluation works."
4.8 Third Party Infrastructure Works				
10.63	4.8.9 "These *works would be expected to cause similar types of impacts to archaeology as for the 400 kV connection, although they would be reduced in area due to the smaller working areas and greater use of trackway required for the 132 kV works. Where practical archaeology would be avoided by these works, but archaeological mitigation would be required in*	This needs to say: "A programme of archaeological evaluation and mitigation would be required in any locations where this is not practicable."	Text edited as requested	The programme of archaeological evaluation to inform where there is archaeology to avoid. Therefore we recommend the following: "*These works would be expected to cause similar types of impacts to archaeology as for the 400 kV connection, although they would be reduced in area due to the smaller working areas and greater use of trackway required for the 132 kV works.* ~~Where~~

	any locations where this is not practicable."			~~practical archaeology would be avoided by these works, but a programme of archaeological evaluation and mitigation would be required in any locations where this is not practicable.~~ **A programme of archaeological evaluation will be undertaken to inform detailed design, enabling archaeology to be avoided where practicable. Where avoidance is not possible, a programme of archaeological mitigation will be required."** This clarifies the process of evaluation to inform design and mitigation where necessary.
10.64	*4.8.14* *"These works would be expected to cause similar types of impacts to archaeology as for the 400 kV connection, although they would be reduced in area due to the smaller working areas and greater use of trackway required for the low voltage works. Where practical, archaeology would be avoided by these works but archaeological mitigation would*	This needs to say: "A programme of archaeological evaluation and mitigation would be required in any locations where this is not practicable."	Text edited as requested	The programme of archaeological evaluation to inform where there is archaeology to avoid. Therefore, we recommend the following: *These works would be expected to cause similar types of impacts to archaeology as for the 400 kV connection, although they would be reduced in area due to the smaller working areas and greater use of trackway required*

	be required in any locations where this is not practicable."			*for the low voltage works.* ~~Where practical archaeology would be avoided by these works, but a programme of archaeological evaluation and mitigation would be required in any locations where this is not practicable.~~ **A programme of archaeological evaluation will be undertaken to inform detailed design, enabling archaeology to be avoided where practicable. Where avoidance is not possible, a programme of archaeological mitigation will be required."**
10.65	*4.8.16* *"These works are not expected to cause any new impacts to archaeology as the works areas would have been affected by construction of the original poles/pylons, and if archaeology were present it would have been removed at this time."*	In the absence of final design submissions, the scope and significance of potential archaeological impacts remain uncertain and will require further assessment once detailed plans are available.	Noted - will revisit once final design submitted	Please include this into the 4.8.16 "These works are not expected to cause any new impacts to archaeological remains as the works areas would have been affected by construction of the original poles/pylons, and if archaeological remains were present it would have been removed at this time. **The archaeological implications of these works will be revisited once final designs have been**

				submitted."
4.9 Environmental Mitigation				
10.66	4.9 *Environmental Mitigation*	**Query**: Is this inclusive of Biodiversity Net Gain (BNG)? BNG areas are typically located beyond the Order Limits and, as such, would not be covered by the archaeological assessment and mitigation measures set out within those limits. However, any proposed BNG areas must be subject to archaeological assessment to ensure that potential impacts on the historic environment are appropriately addressed. It is important to note that certain habitat creation methodologies, such as soil inversion, can be highly damaging to buried archaeological remains. **Therefore, archaeological considerations must be integrated into the planning and design of the projects BNG proposals.**	No off-site BNG is proposed. This has been dealt with in the response to written questions.	Are you sure, as this is not consistent with discussions the applicant is having with other areas.
5. Outline Written Scheme of Investigation				
5.1 Detailed Written Scheme of Investigation				

10.67	*5.1.1* *"DWSIs would be prepared setting out in detail specific mitigation measures for the detailed design of the Project, informed by the strategy described in this Outline AMS-OWSI. Existing models and new datasets collected during fieldwork would inform design of mitigation works in the DWSIs during the investigations. These DWSIs would be prepared by the relevant Archaeological Contractor(s) in consultation with National Grid, the relevant Local Planning Authority Archaeological Advisors and Historic England. The DWSIs would be approved by the relevant Local Planning Authority (through the relevant Local Planning Authority Archaeological Advisors) and, if relevant, Historic England, prior to works commencing in the area to which each DWSI applies. A period of 28 days for review and agreement of DWSIs will be included in the programme."*	This only sets out DWSIs for the purpose of archaeological mitigation and does not recognise that it will be process of further archaeological evaluation and mitigation informed by the results of evaluation.	Text edited	For clarity, please add in the following: **"Separate** DWSIs would be prepared setting out in detail specific mitigation and evaluation measures for the detailed design of the Project, informed by the strategy described in this Outline AMS-OWSI."

10.68	*5.1.2 "The specification for the archaeological works contained within the DWSIs would be written in accordance with this Outline AMS-OWSI, and the complete suite of CIfA Standards and Guidance (CIfA 2020a-c, 2022b, 2023a–f). These documents cover archaeological evaluation, excavation, archaeological monitoring and recording (watching brief), and other related fieldwork and post-excavation activities. The DWSIs will also adhere to the current CIfA Code of Conduct (CIfA 2022a) and all other relevant best-practice guidance and standards."*	This needs to make specific reference to Historic England Guidance and Local Guidance.	Text edited	Suffolk County Council Guidance is now updated and should be 2026 for all versions of our guidance.
10.69	*5.1.3 "DWSIs would be prepared for specific geographic areas of works, such as a section of overhead line construction, or for types of construction works, such as temporary construction compounds. The approach would depend on the requirements of the construction programme and the nature of archaeology to be*	Separating DWSIs by specific scheme element would be confusing and unworkable. Instead, DWSIs will be prepared for each archaeological phase (evaluation and mitigation) within defined geographic work areas.	The Applicant disagrees. This is how the DWSI's have been produced so far. Text edited to ensure separate DWSIs for eval and mitigation	Amended text is agreeable, no further comment.

	mitigated."			
10.7	*5.1.4* *"Each DWSI would set out the timing and order of the investigative works and include details of how the archaeological programme interacts with other construction activities, and the parties undertaking them. Each DWSI would include a programme for the archaeological work that would be referenced against key milestones/events in the overall design and construction programme."*	The DWSIs should acknowledge that the archaeological programme is fluid, with timelines contingent on the extent and significance of archaeological remains, weather, site conditions, site access, and contractor availability.	Text edited	The amended text is agreeable
10.71	*5.1.5* *"The Archaeological Clerk of Works (ACoW) and/or the Archaeological Contractor(s) would produce archaeological constraints maps and give Tool Box Talks to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are*	Please remove "and generally" as the purpose of these documents is to ensure the protection of heritage assets.	Text edited as requested	No further comment

	required and their obligations under the Outline AMSOWSI, DWSI ***and generally [emphasis added]****, to ensure that these are put in place and complied with."*			
10.72	*5.1.6* *"The archaeological mitigation works would be delivered by an Archaeological Project Team under the leadership of an experienced Project Manager. The Archaeological Project Team would be provided by one or more Archaeological Contractor(s), to be appointed by National Grid. The Archaeological Contractor(s) would have prime responsibility for delivery of the full programme of archaeological mitigation as set out in the Outline AMS-OWSI including: all on and off-site works; technical and nontechnical publication and dissemination; and preparation and deposition of the archaeological Project archive with the recipient museum or other appropriate*	This should include: "The archaeological mitigation, including further phases of evaluation and paleoenvironmental assessment, would…" This confirms that the Outline Written Scheme of Investigation will specify additional archaeological evaluation and palaeoenvironmental assessments to inform the formulation of appropriate mitigation	Text edited as requested	No further comment

	storage facility."			
10.73	*5.1.7* *"The Archaeological Project Team would include named key specialists who would either be site-based or have a regular site presence, or who would be on-call at short notice. These would include (but not be limited to) the following roles:* · *Ceramics specialist with relevant period expertise"*	The Ceramic specialist should have relevant period and experience of local typologies.	Text edited	No further comment
10.74	5.1.8 "The names and qualifications of the individuals fulfilling these roles would be provided by the Archaeological Contractor(s) to National Grid for information and comment, immediately after their appointment. The postholders would be in place at the start of	CV's of the archaeological contractors staff and specialists should be included in the DWSIs for LPAAA approval.	Text edited	No further comment

	the mitigation programme. Any changes to the named Archaeological Project Team postholders would be notified to National Grid, for information and comment."			
10.75	5.1.11 and 5.1.12 Unexpected finds	This appears to be in the wrong section and should be moved to the mitigation methodology section. This should also be retitled to Unexpected Finds During Construction. A robust protocol must be established to train operatives in identifying archaeological remains during construction works. 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.	Text edited and moved	Amend 5.1.11 to the following: **Unexpected finds during construction activities** *If unexpected finds (sites, artefacts, environmental remains or ecofacts, monuments or features) are made during ~~the construction stage~~* **construction activities**, *a site consultation meeting(s) would be convened between the Main Works Contractor(s), National Grid, the ACoW, the Archaeological Contractor(s), the relevant Local Planning Authority Archaeological Advisors and (if appropriate) Historic England or other key stakeholders…"* This needs to be made clear that this is unexpected finds during construction activities and not

				unexpected finds during archaeological works.
5.2 Communication, Monitoring and Sign-Off				
10.76	5.2.1 *"On a project of this size, effective communication between all parties is essential. A communication strategy for external communications about the archaeological mitigation would be developed and implemented in line with the Outline Stakeholder Communications Plan, Appendix E of the Outline CoCP (document reference 7.2)."*	This should also incorporate appropriate and timely protocols for the dissemination of plans and photographic documentation.	Text edited	No further comment
10.77	*5.2.2.* *"Regular progress meetings would be held monthly during the programme of archaeological mitigation works between key stakeholders, including the Local Planning Authority Archaeological Advisors and Historic England,*	The principle of regular progress meetings should extend into the post-excavation analysis period, although the frequency of such meetings may be reduced.	Text edited	No further comment

	the relevant Archaeological Contractor(s), the ACoW, National Grid and Main Works Contractor(s)as required."			
10.78	5.2.6 "Site monitoring has two elements, firstly, the day-to-day liaison and monitoring between the ACoW and the Archaeological Contractor(s), National Grid, and the Main Works Contractor(s) (as relevant) to monitor progress and compliance with the requirements of the DWSIs, and secondly the monitoring of the archaeological mitigation works by the Local Planning Authority Archaeological Advisors."	We would recommend the following amendment: "Site monitoring would be the day-to-day liaison and monitoring between the ACoW and the Archaeological Contractor(s), National Grid and the Main Works Contractor, and regular monitoring of the progress and compliance with the requirements of the DWSIs and archaeological fieldwork and post-excavation work by the Local Planning Authority Archaeological Advisors"	Text edited as requested	No further comment
10.79	5.2.7 *"The first element would include (but not be limited to):* · *Monitoring of all aspects of archaeological fieldwork by the ACoW* · *Monitoring of the installation and removal of protective measures, such as temporary*	We would recommend the following amendment: "The responsibilities of the ACoW will include (but not be limited to): · Day to day monitoring of all aspects of the archaeological fieldwork. · Day to day monitoring of the instillation and removal of protective measures, such as	Text edited as requested	No further comment

	fencing, and at sites where preservation of archaeological remains is required by the ACoW."	temporary fencing and at sites where preservation of archaeological remains is required. Where issues are identified, the ACoW will report to the relevant LPAAA."		
10.8	5.2.8 *"The archaeological mitigation works would be subject to ongoing monitoring by the ACoW, who would have unrestricted access to the sites, site records or any other information as may be required. The work would be inspected to ensure that it is being carried out to the required standard and that it would achieve the desired aims and objectives."*	We would recommend the following amendment: "The archaeological mitigation works would be subject to ongoing monitoring by the relevant LPAAA and ACoW, who would have unrestricted access to the sites, site records or any other information as may be required. The work would be inspected to ensure that it is being carried out to the required standard and that it would achieve the desired aims and objectives."	Text edited as requested	No further comment
10.81	5.2.10 *"The second element would ensure that archaeological mitigation works meet the requirements of each approved DWSI."*	We would recommend the following amendment: Monitoring by the relevant LPAAA would ensure that archaeological mitigation works meet the requirements of each approved DWSI.	Text edited as requested	No further comment

10.82	*5.2.13* *"National Grid would act as coordinator of engagement between the Archaeological Contractor(s) and the relevant heritage stakeholders, to ensure the timely provision of on-site advice to the fieldwork team."*	This should be the National Grid ACoW specifically. On other projects of similar scale and complexity, there have been significant and problem causing delays as a result of complexity of engagement through hierarchies.	Text edited	No further comment
10.83	*5.2.16* *"Once the Archaeological Contractor(s) determines the fieldwork to be completed, a sign-off meeting would be held on site (unless alternative communication is agreed) between the ACoW, National Grid, Local Planning Authority Archaeological Advisors (and Historic England, if appropriate), the Archaeological Contractor(s) and the Main Works Contractor(s)."*	We would recommend the following amendment: "Once the Archaeological Contractor(s) believes the fieldwork to be completed, a sign-off meeting would be held on site…" This then works with 5.2.17 as the LPAAA will determine completion of fieldwork.	Text edited as requested	No further comment NB. On other large NSIP projects, direct communication between the archaeological contractor and SCCAS, with all relevant parties copied into correspondence has allowed for rapid sign off of trenches. This is something to consider for the project.

10.84	*5.2.18* *"Sites that have been completed would be subject to a formal signing off procedure. The Archaeological Contractor(s) would submit a completion statement to the ACoW. The ACoW would submit the accepted completion statement to National Grid and the appropriate Local Planning Authority Archaeological Advisor for confirmation (in consultation with Historic England, where required) that the relevant works have been completed in compliance with the relevant DWSIs."*	We would recommend the following amendments: "Sites that have been completed would be subject to a formal signing off procedure, in order to allow the mitigation areas to be released to the construction team. The Archaeological Contractor(s) would submit a completion statement to the ACoW. This statement will include a final site plan, showing locations of archaeological features and interventions (in both PDF and Shapefile format). The ACoW would submit the accepted completion statement to National Grid and the appropriate Local Planning Authority Archaeological Advisor for confirmation (in consultation with Historic England, where required) that the relevant works have been completed in compliance with the relevant DWSIs." These additions state the purpose of the signing off of mitigation areas and will allow for the submission of plans to detail the completion of the archaeological fieldwork.	Text edited as requested	No further comment
10.85	*5.2.19* *"In the event of disagreement between the Archaeological Contractor(s), the ACoW, the relevant Local Planning Authority Archaeological Advisor and/or National Grid on the progress, strategy or completion*	Schedule 4 sets out the appeal procedure. Any appeal would relate specifically to the content of the DWSI, since the DWSI defines the strategy that must be agreed before archaeological works commence, as required by the AMS-OWSI. For this reason, we consider Schedule 4 an impractical mechanism for resolving on-site disputes	The Applicant prefers to retain this paragraph in order to retain the process no matter how unlikely its use might be.	We are not sure about this.

	of work, a form of arbitration would be proposed in accordance with Schedule 4 of the Draft DCO (document reference 3.1).”	about sign-off. The LPAAA’s role is to ensure compliance with the DWSIs and to secure appropriate management and protection of archaeological heritage assets.		
10.86	*5.2.20* *“National Grid would act as coordinator of engagement between the Archaeological Contractor(s) and the relevant heritage stakeholders, to ensure the sign-off meeting is held in a timely manner.”*	**Query:** Can you clarify that this would be the ACoW?	Confirm this would be the ACoW, edit made	No further comment
10.87	***Interim Statements, Post-Excavation Reporting and Publication*** 5.2.22 *“The Post-Excavation Assessment Report would be approved by the relevant Local Planning Authority (through the relevant Local Planning Authority Archaeological Advisors) and Historic England.”*	We recommend the sub-title of this section be amended to clarify the content of this section: Review of Interim Statements, Post-Excavation Assessment Reporting, Updated Project Design and Publication.	Text edited as requested	No further comment

10.88	***Interim Statements, Post-Excavation Reporting and Publication*** 5.2.22 *"The Post-Excavation Assessment Report would be approved by the relevant Local Planning Authority (through the relevant Local Planning Authority Archaeological Advisors) and Historic England."*	We recommend the inclusion of the Updated Project Design: "The Post-Excavation Assessment Report and Updated Project Design would be approved by the relevant Local Planning Authority (through the relevant Local Planning Authority Archaeological Advisors) and Historic England."	Text edited as requested	No further comment
10.89	*5.2.23* *"Details of the Interim Statements, post-excavation reporting and publication are set out in Chapter 6"*	Please include the Updated Project Design here as well: Details of the Interim Statements, post-excavation reporting, updated project design and publication are set out in Chapter 6.	Text edited as requested	No further comment
5.3 Methodology for Each Mitigation Technique				
10.9	*5.3.2* *"Heritage assets and archaeological sites that will be protected by a combination of protection measures that will be put in place at the start of the construction programme to ensure their long-term survival will be identified in the DWSIs."*	Please ensure that Historic Environment Management Plans (HEMPs) are included, as these documents are required to specify the measures for securing the long-term preservation of heritage assets throughout both the construction and operational phases and will set out the mechanisms for mitigation should preservation in situ not be achievable. "Heritage assets and archaeological sites that will be protected by a combination of protection measures that will be put in place	The Applicant will not commission the production of a Historic Environment Management Plan (HEMP) as set out at Deadline 3.	Is this true? This is in contradiction to the dDCO requirement 5 wording. Which specifies the use of Preservation in situ management plans. Please specify how preservation in situ will be achieved and managed, as the OCoCP is not an appropriate mechanism to secure preservation in situ beyond construction.

		at the start of the construction programme to ensure their long-term survival will be identified in the DWSIs and Historic Environment Management Plans (HEMPs)."		
10.91	*5.3.4* *"Avoidance would be undertaken where it would be practicable to amend design/construction works areas to allow for retention of the archaeological remains in situ and where those archaeological remains are found to be of significant value to require this form of mitigation. Relevant protection measures would include temporary protective fencing which will be maintained throughout the pre-commencement works and construction stages (incorporating an additional 10m buffer area for specific identified designated and non-designated assets where practicable). Some sites may require*	Archaeological evaluation will need to inform on the extent and significance of archaeological heritage assets, this will inform the appropriate protection measures for preservation in situ, to be detailed in the relevant HEMP. The required buffer zones will be dependent upon the nature of archaeological heritage assets and their significance. We recommend the following amendment: Avoidance would be undertaken where it would be practicable to amend design/construction works areas to allow for retention of the archaeological remains in situ and where those archaeological remains are found to be of significant value to require this form of mitigation. Sufficient archaeological evaluation should have been undertaken to establish the extent and significance of archaeological heritage	Text edited as requested. The Applicant will not commission the production of a Historic Environment Management Plan (HEMP) as set out at Deadline 3.	Please specify how preservation in situ will be achieved and managed, as the OCoCP is not an appropriate mechanism to secure preservation in situ beyond construction. Preservation in situ beyond construction for NG would be to maintain a record of the location of heritage assets which have been preserved in situ, so that any maintenance works required do not impact these heritage assets, and trigger consultation with the LPAAA where impact from maintenance works cannot be avoided.

	archaeological photographic recording prior to protection measures to ensure that there is a record of their existing condition, prior to the start of any groundworks."	assets. Relevant protection measures would include temporary protective fencing which will be maintained throughout the pre-commencement works and construction stages (incorporating an additional 10m buffer area for specific identified designated and non-designated assets where practicable and a 20m buffer area for burials and structural remains). Some sites may require archaeological photographic recording prior to protection measures to ensure that there is a record of their existing condition, prior to the start of any groundworks.		

10.92	*5.3.6 – 5.3.11* *"For each site or heritage asset, protection measures will be described in a DWSI prepared in consultation with the relevant Local Planning Authority Archaeological Advisors and, if appropriate, Historic England. This will also include arrangements for regular site inspections by the ACoW, maintenance requirements, and 'Tool-Box Talks' to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under this Outline AMS-OWSI and generally, to ensure that these are put in place and complied with. New sites may be added to the number of sites for preservation of archaeological remains, or existing sites may be adjusted."*	We recommend the following amendment to add clarity and appropriate mechanisms for protection of heritage assets. "For each site or heritage asset, protection measures will be described in a DWSI and Historic Environment Management Plan (HEMP) prepared in consultation with the relevant Local Planning Authority Archaeological Advisors and, if appropriate, Historic England. This will also include arrangements for regular site inspections by the ACoW, maintenance requirements, and 'Tool-Box Talks' to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under this Outline AMS-OWSI and generally, to ensure that these are put in place and complied with, preservation in situ sites will also be recorded on project live constraints mapping. New sites may be added to the number of sites for preservation of archaeological remains, or existing sites may be adjusted."	No edits The Applicant will not commission the production of a Historic Environment Management Plan (HEMP) as set out at Deadline 3. At this current time it is not the Applicant's intension to maintain live constraints mapping during the construction phase of the Project.	Please specify how preservation in situ will be achieved and managed, as the OCoCP is not an appropriate mechanism to secure preservation in situ beyond construction. Preservation in situ beyond construction for NG would be to maintain a record of the location of heritage assets which have been preserved in situ, so that any maintenance works required do not impact these heritage assets, and trigger consultation with the LPAAA where impact from maintenance works cannot be avoided. SCCAS would strongly recommend the implementation of live constraints mapping for this project.

10.93	5.3.6 – 5.3.11 ***Burial or Sealing of Remains***	Reburial of exposed archaeological deposits is no longer considered best practice. Once stratigraphy has been disturbed and the original burial environment cannot be reinstated, preservation in situ will be compromised. The use of barrier membranes risks further damage by altering soil hydrology and introducing oxygen, thereby accelerating the deterioration of artefacts and palaeoenvironmental remains. Where temporary ground-raising above topsoil or ploughsoil level is unavoidable, comprehensive testing must first assess the potential for compaction and compression damage to buried deposits. The depth and character of the archaeological heritage assets should inform this assessment, since mechanical pressure can cause both direct and indirect harm through compaction and plastic deformation. Any subsequent decompaction methodology must likewise be developed in response to the archaeological evaluation results and include appropriate mitigation measures prior to implementation.	Text edited in line with Historic England guidance	Please specify how preservation in situ will be achieved and managed, as the OCoCP is not an appropriate mechanism to secure preservation in situ beyond construction. NB. Please be aware that membrane and pea shingle when removed can be considered a ground contaminant under the soil management plan, and remediation works may be required to remove the contaminated soil.

10.94	*5.3.12* *"To demarcate those sites that require preservation of archaeological remains and to avoid unintentional damage during construction, temporary fencing will be installed during the start of the construction stage. The fencing will be installed by a fencing contractor(s) under the supervision of the relevant Archaeological Contractor(s)."*	Archaeological evaluation will need to inform on the extent and significance of archaeological heritage assets, this will inform the appropriate protection measures for preservation in situ, to be detailed in the relevant HEMP. We would recommend the following amendment: "To demarcate those sites that require preservation of archaeological remains, sufficient archaeological evaluation should have been undertaken to establish the extent and significance of archaeological heritage assets. To avoid unintentional damage during construction, temporary fencing will be installed during the start of the construction stage. The fencing will be installed by a fencing contractor(s) under the supervision of the relevant Archaeological Contractor(s)."	Text edited as requested	No further comment
10.95	*5.3.13* *"The location and type of fencing for each site for preservation of archaeological remains will be set out in the DWSI (it may be helpful for the Archaeological Contractor(s) to combine various sites into a single DWSI). It will also set out whether any preliminary archaeological investigative work is required (before or*	We would recommend the following the amendment: The location and type of fencing for each site for preservation of archaeological remains will be set out in the DWSI (it may be helpful for the Archaeological Contractor(s) to combine various sites into a single DWSI), and the Historic Environment Management Plan (HEMP). It will also set out whether any preliminary archaeological investigative work is required (before or during the installation or removal process). Requirements for	The Applicant will not commission the production of a Historic Environment Management Plan (HEMP) as set out at Deadline 3.	Please specify how preservation in situ will be achieved and managed, as the OCoCP is not an appropriate mechanism to secure preservation in situ beyond construction. Preservation in situ beyond construction for NG would be to maintain a record of the location of heritage assets which have been preserved in situ, so that

	during the installation or removal process). Requirements for archaeological investigation will be contained within the DWSIs."	archaeological investigation will be contained within the DWSIs and the HEMP.		any maintenance works required do not impact these heritage assets, and trigger consultation with the LPAAA where impact from maintenance works cannot be avoided.
10.96	5.3.15 – 5.3.18 ***Track Matting***	Where the depth of topsoil and subsoil is sufficient, track matting may be employed to minimise direct disturbance of archaeological deposits and features. However, the necessity for subsequent remedial interventions, such as soil decompaction, will irrevocably alter the original burial environment and thus cannot be regarded as true preservation in situ. Accordingly, any area subject to decompaction or related soil-remediation measures must first be the focus of targeted archaeological mitigation prior to the commencement of those works. A paragraph outlining this constraint should be added to the relevant sub-section.	Text edited	Amendment is acceptable

10.97	*5.3.22* *"Geoarchaeology studies should follow the guidance provided by Historic England (2015b), Norfolk County Council (2018), Suffolk County Council Archaeology Service (SCCAS) (2018) and Essex County Council (2020). Buried soils and sediment sequences may be inspected and recorded on site at all intrusive stages of the Project by a geoarchaeologist* ***where practicable [emphasis added]*** *in order to produce a geoarchaeological deposit model. Historic records of previous ground investigation, where available, may also be consulted to inform the deposit model. This model can then provide further understanding of site formation processes and subsequently reduce or avoid the collection and processing of redundant samples during further intrusive works or provide an outcome as mitigation."*	Please remove "where practicable" as the geoarchaeological assessment and mitigation will need to be delivered. There should be suitable mechanisms in place to allow safe recovery of geoarchaeological samples, e.g. coring and/or shuttered trenches.	Text edited as requested	No further comment

10.98	*5.3.23* *"Samples will be collected for analysis of chemistry, magnetic susceptibility, particle size, micromorphology and/or other techniques as appropriate, following the outline strategy presented in a DWSI, and in consultation with the Archaeological Contractor(s)'s geoarchaeologist, ACoW, National Grid, and Local Planning Authority archaeological advisors."*	Establishing the chronology for the stratigraphic sequences is essential. Accordingly, we recommend the incorporation of appropriate scientific dating methodologies. Samples will be collected for scientific dating, analysis of chemistry, magnetic susceptibility, particle size, micromorphology and/or other techniques as appropriate, following the outline strategy presented in a DWSI, and in consultation with the Archaeological Contractor(s)'s geoarchaeologist, ACoW, National Grid, and Local Planning Authority archaeological advisors.	Text edited as requested	No further comment
10.99	***Geoarchaeological Deposit Modelling***	We recommend that the sub-section heading be amended to: **Geoarchaeological and Palaeoenvironmental Assessment** This revision will clarify the purpose of the sub-section and distinguish it from the subsequent Geoarchaeological and Palaeoenvironmental Mitigation section.	Text edited as requested	No further comment
10.1	5.3.24	We would also recommend an additional bullet point: · To inform the development of the significance of deposits and of the potential for preservation of organic archaeological remains within deposits.	Text edited as requested	No further comment

10.101	*5.3.26* *"Geoarchaeological and palaeoenvironmental investigation is also discussed below"*	This needs to reference the section where it is further discussed.	Text edited as requested	No further comment
10.102	5.3.33 *"The aims of geophysical surveys are set out in Table 2.1. The following general approach will apply for geophysical surveys."*	Table 2.1 "*A non-intrusive archaeological survey technique used to identify differences between buried archaeological remains and surrounding soil. The purpose of this is to understand likely presence, extent and nature of buried archaeological remains*." This does not discuss the aim. There are many different forms of geophysical survey, each with different survey outcomes and limitations. This paragraph should describe the types of survey available for the project and the limitations of the survey types.	Text edited as requested	Does not appear to be edited
10.103	*5.3.37* *"Project archives must be prepared in line with Schmidt (2013) and submitted to the relevant county archive."*	These will need to be included with the relevant PXA and the UPD.	Noted	Not amended
10.104	*5.3.38* *"The results of the geophysical survey will need to be placed fully within the context of known nearby archaeological findings of all kinds."*	The results of the evaluation and resulting mitigation will need to be compared to the geophysical survey to confirm the accuracy of the survey results.	Text edited	No further comment

10.105	*5.3.40* *"At the pre-commencement stage additional trial trenching will be carried out in areas along the Project where, although all evaluation necessary for the purposes of the ES (Volume 6 of the DCO application) was completed, detailed evaluation was not completed due to access issues. The purpose of the trenching will be to determine the presence/absence, extent, character, condition and significance of the remains in order to inform the detailed mitigation requirements at these locations should it be required."*	Archaeological trial trench evaluation has not been completed for very large areas of the project where significant project construction impacts will occur. We would recommend the following amendment to this sentence: *"The purpose of archaeological trial trenching will be to determine the presence/absence, extent, character, condition and significance of the remains in order to inform a mitigation strategy."*	Text edited as requested	SCCAS would recommend the following amendment, with the removal of "*although all evaluation necessary for the purposes of the ES (Volume 6 of the DCO application) was completed, detailed evaluation was not completed due to access issues."* As this is a representation to the ExA and not suited for inclusion in the OWSI. "At or before the pre-commencement stage ~~additional~~ trial trenching will be ~~carried out~~ **undertaken** in any areas **of project impact that have not previously been trial trenched** ~~that have not along the Project where, although all evaluation necessary for the purposes of the ES (Volume 6 of the DCO application) was completed, detailed evaluation was not completed due to access issues.~~ The purpose of archaeological trial trenching will be to determine the presence/absence, extent, character, condition and significance of the remains in

				order to inform a mitigation strategy."
Intrusive Archaeological Fieldwork				
Trial Trenching				
10.106	Trial Trenching	Please insert a paragraph specifying that sampling shall cover 4 percent of the total area in sectors underlain by geophysical survey and 5 percent where no survey data exists. Trenches shall not exceed 30 metres in length, unless otherwise approved by the Local Planning Authority Archaeological Advisor (LPAAA) and, shall be at least 1.8 metres wide. Where geophysical survey results are available, trench positions shall be selected to investigate both identified anomalies and "blank" areas, to "ground truth" the results and shall be laid out in a systematic array to minimise gaps between adjacent trenches.	See section 1.10 of the AMS	Please add this into the OWSI as the OWSI is the control document for the DCO. The OAMS defines principles around archaeological evaluation and mitigation to inform the DCO examination process and is not a primary control document used to manage post-consent delivery of archaeological works.

10.107	*5.3.41* *"The approach to be employed during this stage of additional trial trenching will be identical to that used during the archaeological evaluation stage (used to inform and confirm the ES findings), and as set out in the Overarching Written Scheme of Investigation for Pre-Commencement Trial Trenching (Headland Archaeology 2025). However, the approach shall consider specific provisions of the AMS-OWSI in respect of archaeological excavation, environmental sampling and scientific dating, where relevant."*	Replace additional trail trenching with **archaeological trial trenching** as this will be a continuation of the trial trenching that is being undertaken pre-determination. This paragraph is confusing, as it sets out that the trial trenching will be identical to the pre-submission trial trenching, but then in the second sentence states that it will be different. Archaeological evaluation is to assess the archaeological resource, determining its presence or absence, its character, extent and significance. The archaeological trail trenching will inform archaeological mitigation and the development of mitigation DWSIs. We would recommend the following to clarify this paragraph: The further stages of archaeological trail trenching will be implemented in accordance with the AMS-OWSI and will be detailed in DWSIs. The Post-Consent Archaeological Trial Trenching will replicate the methodology used in the pre-determination evaluation stage, detailed within the Overarching Written Scheme of Investigation for Pre-Commencement Trial Trenching (Headland Archaeology 2025). The evaluation DWSIs will apply the AMS-OWSI requirements for excavation, recording,	Text edited as requested	No further comment

		environmental sampling and scientific dating to inform a mitigation strategy.		
11.108	*5.3.42* *"The scope and location of additional trial trenching will be described in a DWSI that will be prepared by the Archaeological Contractor(s) in consultation with National Grid, the relevant Local Planning Authority Archaeological Advisors and Historic England. The DWSIs will be approved by the relevant Local Planning Authority (through the relevant Local Planning Authority*	We recommend that the following amendment be adopted to clarify the objectives of the trenching Detailed Written Scheme of Investigation (DWSI) and to define the role of the Local Planning Authority Archaeological Advisor (LPAAA) in advising the Local Planning Authority (LPA): The scope of archaeological trial trenching will be described in a DWSI that will be prepared by the Archaeological Contractor(s) in consultation with National Grid, the relevant Local Planning Authority Archaeological Advisors and Historic	Text edited as requested	This may need to be updated following further discussions in the Examination regarding Local Government Reform.

	Archaeological Advisors) and Historic England, prior to works commencing in the area to which each DWSI applies."	England. The DWSIs will be approved by the relevant Local Planning Authority (on the advice of the relevant Local Planning Authority Archaeological Advisors) and Historic England, prior to works commencing in the area to which each DWSI applies.		
Detailed Evaluation				
10.109	Detailed Evaluation	Paragraphs need to be added to '**General Approach**' for working at depth, dewatering and plant control we would recommend the following: *Working at depth: The hand-excavation of deep features or deposits on site will only proceed following the design of a suitable safe working practice methodology, as required by national health and safety guidance. The DWSIs will contain appropriate methodologies to achieve safe working at depth, these will include stepping of excavations and the use of shuttering where appropriate."* *Dewatering of features and sites: The DWSI will include details for the dewatering of*	Text edited as requested	Added in as 5.3.54, 5.3.55 & 5.3.56

		features and removal of water from site, including (but not limited to) pumping. *Plant control: Areas defined for archaeological mitigation will be clearly demarked on site, and no plant or other vehicles not directly involved in the archaeological excavation process, will access these areas until the archaeological excavation has been completed, and the area has been formally signed off by the LPAAA and released by the LPA. All plant access to archaeological excavation areas must be supervised and directed by a suitably trained and experienced archaeologist.*		
10.11	*5.3.44* *"Sites that require investigation will be those that are identified in DWSIs and may include new areas that arise as a result of emerging results, detailed design and unexpected discoveries"*	To clarify the process for defining areas for detailed excavation, we propose the following revision: "Sites that require detailed excavation will be identified through a programme of archaeological evaluation and defined in DWSIs for mitigation."	Text edited as requested	No further comment

10.111	*5.3.45* *"Sites designated for detailed archaeological excavation will be stripped with mechanical plant as set out in the DWSI except in areas where further ploughzone sampling is taking place. The sequencing of stripping, location of soil storage areas and arrangements for backfilling, together with other relevant logistical considerations, will be set out in the DWSI."*	**Query:** Can you explain what "further ploughzone sampling" would be?	Included in error, deleted.	No further comment
10.112	*5.3.46* *"For sites where machine stripping is required ~~(following completion of any ploughzone sampling)~~, topsoil, subsoil and other overburden will be removed under the supervision of the relevant Archaeological Contractor(s) to the correct archaeological horizon. The relevant horizon will be informed by the evaluation results, the Research Framework, and the aims and objectives described in the DWSIs."*	Please remove "correct" as machine excavation will stop at the first archaeological horizon. This may be different to the horizon identified at the evaluation stage, as the archaeological may differ across an excavation area. The Research Framework sets out research objectives and aims of archaeological fieldworks, it does not dictate the level/layer at which archaeological machine stripping will stop. Additionally, this paragraph reads as if you are expecting modern made-ground. The project mostly crosses greenfield sites, where significant modern made-ground layers are unlikely. Furthermore, all archaeology contained within a detailed excavation area will need to be investigated and recorded to mitigate the	Text edited as requested Ref. to ploughzone deleted	No further comment

		impacts of the development. We would advise the following amendment: "For sites where machine stripping is required ~~(following completion of any ploughzone sampling)~~, topsoil, subsoil and other confirmed non-archaeological overburden will be removed under the supervision of the relevant Archaeological Contractor(s) to the first archaeological horizon." **Query**: again, please clarify what ploughzone sampling is?		
10.113	*5.3.47* *"In accordance with the research aims and objectives outlined in the Research Framework, which will be further developed through the identification of site specific aims and objectives within the DWSIs in consultation with relevant archaeological Project team specialists, the archaeological site will then be subject to hand excavation of key features designed to recover artefactual and scientific dating evidence. All specialist samples*	The wording of this paragraph is inappropriate for detailed archaeological excavation and project which will be predominantly on green field sites, we recommend the following paragraph: *"The DWSIs will reflect research aims and objectives set out in the Regional Research Frameworks and will be further developed to identify site specific aims and objectives. The archaeological site will be subject to hand excavation of all archaeological features, structures and deposits unless previously agreed with the relevant LPAAA and where relevant Historic England"*	Text edited as requested	No further comment

	will be accurately located in three dimensions. At the same time selected feature complexes would be subject to further hand excavation designed to resolve stratigraphic relationships."	This amendment clarifies that the DWSIs will define the initial research questions and provide for their refinement as archaeological mitigation progresses. It also establishes detailed excavation as a mitigation methodology, requires all archaeological features and deposits within designated excavation zones to be fully excavated and recorded to mitigate the development impacts. This also removes the sentence regarding Environmental Sampling, as this needs to be relocated to the Environmental Sampling section to maintain a clear and cohesive methodology.		
10.113		**NB** Small Finds Recording Additionally, as well as 3D recording for specialist environmental sampling, all small finds recovered during excavation should be recorded using 3D recording techniques to capture their precise spatial context. There should also be provision for full 3D recording of features which contain structured deposition. Please ensure that there is provision for this in the finds and recording methodology within this document.	Covered in para 5.3.65	In Suffolk when excavating inhumation burials, the excavation of metal grave goods within the burial context will need to follow SCCAS guidance Excavating Inhumations for Mineral Preserved Organics Guidance (2026) please ensure this is referenced in this paragraph and in the Human remains section of the OWSI.

10.114	*5.3.48* *"The works will also include sampling of archaeological remains for palaeoenvironmental and palaeo-economic indicators (for example, charred plant remains, molluscs, pollen, etc.) (see Environmental Sampling Strategy), in accordance with the DWSI and the Research Framework. Artefact and palaeoenvironmental assessments will be carried out during the course of the fieldwork; selected key features/structures will be subject to more detailed excavation and sample recovery to address the evolving research objectives of the archaeological programme."*	To provide clarification to this paragraph we would recommend the following amendment: "Excavation and recording of archaeological features and deposits will also include appropriate sampling for palaeoenvironmental and palaeo-economic indicators (for example, charred plant remains, molluscs, pollen, etc.) (see Environmental Sampling Strategy)..."	Text edited as requested	No further comment

10.115	*5.3.49* *"The proportion of features excavated will be determined by the significance of the remains and the requirements of the research objectives set out in the DWSI. This iterative process is intended to allow the approach to excavation sampling to be both flexible and closely targeted to address specific questions, rather than being tied to a pre-determined excavation strategy.* ***The proportion will be determined in consultation with National Grid."***	The Local Planning Authority Archaeological Advisors (LPAAA) will assess whether the works to be undertaken/undertaken meets the appropriate standards. Therefore, National Grid are not suited to determine the suitability of their own work, and the sentence "The proportion will be determined in consultation with National Grid." Should be removed. **All archaeology within areas defined for detailed excavation must be excavated and recorded,** unless otherwise agreed with the relevant LPAAA. Any initial research questions will be detailed within the DWSIs, however, it is expected that the **initial research questions** will need to be refined during the course of excavation as new information is identified, and new research questions are required. We would recommend the following, which clarifies the purpose of Detailed Excavation as a mitigation strategy: "All features will be excavated and recorded, unless otherwise agreed with the relevant LPAAA." This **clearly defines the purpose of Detailed Excavation** as a mitigation methodology.	Text edited as requested	No further comment

10.116	*5.3.50* *"The research objectives and excavation strategy will be kept under review during the investigation at each site. In order to facilitate this approach, relevant data, artefact and environmental sample processing will be undertaken whilst the investigation proceeds on site (including artefact spot-dating and preliminary assessment of environmental samples, see section – Environmental Sampling Strategy). The preliminary assessment of materials, including faunal remains, ecofacts and palaeoenvironmental proxies recovered from samples, undertaken whilst the investigation is underway will support the outlined iterative approach to sampling.* ***Decisions on further investigation at a given site will be made once sufficient information becomes available [emphasis added]"***	There is no mention of the DWSIs within this paragraph, which will detail the sampling strategy. Additionally, please remove "*Decisions* on further investigation at a given site will be made once sufficient information becomes available" as this is confusing. All archaeology contained within a detailed excavation area will need to be excavated and recorded to appropriate national and local standards and guidance. We would recommend the following for clarity of the process: "The research objectives and excavation strategy set out within the DWSIs will be kept under review during the investigation at each site. A process will be set out within the DWSIs to facilitate this approach. Initial artefact and environmental sample processing will be undertaken whilst the investigation proceeds on site (including artefact spot-dating and preliminary assessment of environmental samples, see section – Environmental Sampling Strategy). The preliminary assessment of materials, including faunal remains, ecofacts and palaeoenvironmental proxies recovered from samples, undertaken whilst the investigation is underway will inform any updated sampling strategy. However, the minimum sampling requirements defined in the DWSIs will be adhered to"	Text edited as requested	No further comment

10.117	*5.3.51* *"Palaeoenvironmental sampling and environmental sequences of* ***Pleistocene [emphasis added]*** *date have the potential to recover information about past human environmental interactions, human activities and evidence of environmental change."*	We would recommend replacing "Pleistocene" with Quaternary (as this covers both Pleistocene and Holocene).	Text edited as requested	No further comment
10.118	*5.3.53* *"The Archaeological Contractor(s) shall not excavate any area beyond those identified within the relevant DWSI. Should archaeological features revealed within the excavation area continue outside of the area and are likely to be subject to construction impact, the excavation area may need to be extended to fulfil the requirements of the DCO and National Policy Statement (NPS) (EN-1) (DESNZ, 2024). This will only be undertaken with the agreement of National Grid, the ACoW and the Main Works Contractor(s), in consultation with the relevant Local Planning Authority Archaeological Advisors and where appropriate*	We would recommend the following amendment to clarify this paragraph, all DWSIs will need to have provision to extend the defined excavation area where significant archaeological remains, features extend beyond the boundaries of the excavation area, within the areas of construction impact: "The Archaeological Contractor(s) shall not excavate any area beyond those identified within the relevant DWSI, unless archaeological features revealed within the excavation area continue outside of the area and are likely to be subject to construction impact, then the excavation area may need to be extended to fulfil the requirements of the DCO and National Policy Statement (NPS) (EN-1) (DESNZ, 2024). This will only be undertaken following consultation with National Grid, the ACoW, the Main Works Contractor(s), the relevant Local Planning	Text edited as requested	No further comment

	Historic England.”	Authority Archaeological Advisors and where appropriate Historic England.”		

10.119	*5.3.54* *"Detailed archaeological excavation will be carried out at the locations identified in the DWSIs. Each detailed archaeological excavation area will be positioned using electronic survey-grade equipment. The initial stage of excavation will be undertaken using a 360° mechanical excavator or other similar back-acting plant fitted with a toothless bucket, used in such a manner as to expose cleanly the archaeological surface. The Archaeological Contractor(s) shall ensure that hired-in plant and operators have the capability to achieve a consistently high standard of work. All operatives will receive an induction outlining the nature of any archaeological remains likely to be encountered and the expectations of the Archaeological Contractor(s), Main Works Contractor(s), the wider Project Team, and National Grid. The DWSIs for each site will include proposals for the stockpiling, handling and*	We would recommend the following amendment: Detailed archaeological excavation will be carried out at the locations identified in the DWSIs. Each detailed archaeological excavation area will be positioned using electronic survey-grade equipment. Overburden will be removed using a 360° mechanical excavator or other similar back-acting plant fitted with a toothless bucket, under continuous supervision and direction of an appropriately qualified archaeologist. Removal of overburden should be undertaken to the first archaeological horizon and expose a clean archaeological surface. The Archaeological Contractor(s) shall ensure that hired-in plant and operators have the capability to achieve a consistently high standard of work. All operatives will receive an induction outlining the nature of any archaeological remains likely to be encountered and the expectations of the Archaeological Contractor(s), Main Works Contractor(s), the wider Project Team, and National Grid. The DWSIs for each site will include proposals for the stockpiling, handling and replacement of topsoil with reference to the Outline Soil Resource Plan, Appendix C of the Outline CoCP (document reference 7.2).	Text edited as requested	Now 5.3.57 Colluvium and alluvium are covered in 5.3.64 No further comment.

	replacement of topsoil with reference to the Outline Soil Resource Plan, Appendix C of the Outline CoCP (document reference 7.2).”	**Note:** The archaeological horizon will likely vary across a site, and there will likely be colluvial and alluvial deposits which will mask archaeological features, or have archaeological features stratified within them. This may result in sites requiring more than one mechanical strip, and the archaeologists should be aware that the level will likely not remain constant across one site. The DWSIs will need to contain methodologies for investigation of colluvium and alluvium		
10.12	*5.3.56* *“The surface achieved through machine excavation will be inspected for archaeological remains. The resulting surface will be cleaned by hand in order to identify or define the extent of archaeological remains present. Areas where hand cleaning is likely to be required will be identified in the DWSI; decisions regarding where additional hand*	This paragraph is confusing as it states that there will be hand cleaning immediately following machine strip but then goes on to say that not all areas are to be hand cleaned. To avoid confusion on site, we would recommend the following amendment: “Where the surface exposed through machine stripping does not provide clarity of the exposed archaeological remains, hand cleaning will be required to define the extent	Text edited as requested	No further comment

	cleaning is required will be made on site."	and nature of archaeological features. Where sites are left open and previously clean horizons have become silted or unclear, re-cleaning of these areas by hand will be required to re-define the extent and nature of archaeology. Provision for hand cleaning will be identified in the DWSI"		

10.121	*5.3.58* *"Topsoil within detailed excavation areas will be subject to a rapid metal detector scan prior to stripping, to identify and recover metal objects within the topsoil. ~~All archaeological metal artefacts (except those that cannot be X-rayed, such as lead artefacts) will be subject to X-ray, which will be used to rapidly scan material for retention or disposal (with reference to the CIfA selection toolkit 2019 (rev. 2022)).~~ The finds co-ordinator/processing specialist and the Conservation specialist will be consulted. Stripped surfaces and archaeological features will also be subject to a rapid metal detector scan to identify loose artefacts from uncleaned surfaces, and on cleaned surfaces to help identify areas for careful excavation. Hand-excavated spoil will also be scanned. This will be undertaken by an appropriately qualified or experienced metal detectorist. The DWSIs will set out how metal detecting will be used as part of the artefact*	Please remove the sentence on find retention and x-ray of metal artefacts as this is more suited for inclusion within the finds post-excavation analysis section. All finds should be recovered from site and assessed by the relevant specialist at the post-excavation assessment stage. Specialist advisors will recommend a discard policy following assessment, in accordance with the CIfA selection tool kit and other relevant guidance.	Text edited as requested	No further comment

	recovery strategy for individual sites. Provision will also be made for 3D location recording of artefacts within features, but also within unstratified deposits where significant quantities are identified. The Archaeological Contractor(s) will consider the use of metal detecting at the end of each day in order to assist in site security."			

10.122	*5.3.59* *"Hand excavated trenches and test pits will be opened using hand tools instead of mechanical plant in circumstances where sensitive/fragile archaeological remains are predicted to survive based on the results of ploughzone artefact sampling and/or trial trenching. These circumstances may include, for example, in situ lithic assemblages whose fabric could be damaged by the use of mechanical equipment, or distortion of spatial distributions, or where the scale of the investigations is significantly smaller, or where greater control is required (for example where deposits of buried colluvium have been exposed)."*	This is confusing, we would recommend the following amendment to clarify: "Where ploughzone artefact sampling or trial trenching suggests sensitive or fragile remains may survive, trenches and test pits shall be opened with hand tools rather than mechanical plant. Circumstances requiring this approach include: · In situ lithic assemblages at risk of fabric damage or spatial distortion. · Investigations on a very small scale where fine control is essential. · Exposed buried colluvial or alluvial deposits with potential to contain or seal archaeological remains. Hand excavation in these scenarios ensures maximum protection and accurate recording of delicate archaeological contexts. Hand excavations of test-pits or slots will inform a design for removal of deposits, created in consultation with the relevant LPAAA and Historic England where required."	Text edited as requested	No further comment

10.123	*5.3.60* *"Hand excavation will be used to establish the presence/absence of remains/artefact distributions, the extent and condition of the remains or concentrations of artefacts, and to inform additional mitigation requirements. It may be necessary to limit the depth of the investigation so as not to compromise the integrity of a high value potential resource, such as a buried ground surface. Hand excavation will be conducted with due regard to the potential survival of cultural material at the interface with the topsoil and the potential survival of microtopographic features, as identified in the DWSIs. It may also be necessary to excavate deposits using spits of predetermined thickness to allow cross-site comparisons with work undertaken at the evaluation stage. The proposed use of spits will be set out in the DWSIs."*	This is very confusing and the way it has been written seems to suggest it is best suited for an evaluation methodology rather than mitigation. **This paragraph will need to be re-written to define it as part of the mitigation strategy**. We would recommend the following: "Where deposits with archaeological potential, such as colluvium, alluvium, buried soils and occupation layers etc. are encountered during the mitigation works, these will need to be assessed by hand-excavation of test pits, or where appropriate, slots, to inform an appropriate strategy for their full excavation and recording, which will need to be agreed with the relevant LPAAA and if required Historic England. This process will be defined within the DWSIs."	Text edited as requested	No further comment

10.124	*5.3.61* *"As well as the routine collection of artefacts that will be carried out during normal site works, other techniques may be deployed as identified in the DWSI, to recover datasets relevant to the investigation and site specific or Project-wide research objectives."*	This is confusing and doesn't provide any methodology for finds of special value (small finds). We recommend the following to clarify: "Finds will be recovered and will be bagged and labelled according to the context from which they were recovered. Where finds of specific value (small finds) are identified, e.g. metal artefacts, grave goods, structured deposition etc. their position will be recorded three-dimensionally prior to removal from the context."	Text edited as requested	No further comment
10.125	*5.3.62* *"The Archaeological Contractor(s) will consult the specialists during the preparation of the DWSIs, regarding the artefact recovery strategy. If changes are required during the course of the investigation at a site, then these will be developed as an iterative process at site consultation meeting(s) between the Archaeological Contractor(s), National Grid, and the relevant Local Planning Authority Archaeological Advisors and where appropriate Historic England."*	All finds, unless of demonstrably 20th century or later date, will be recovered from site. The discard policy will need to be agreed with the relevant LPAAA, and will be informed by specialist assessment of the finds during the post-excavation analysis stage. **NB** In some instances, 20th century finds may also be recovered e.g. finds relating to military sites, WW1, WW2 and Cold War.	Text edited	No further comment

10.126	*5.3.63* *"Archaeological features, layers or deposits identified for excavation will be hand excavated in an archaeologically controlled and stratigraphic manner, to meet the aims and objectives of the investigation as set out in the DWSIs. Machine assisted excavation of large deposits will only be permitted at the discretion of National Grid, in consultation with the relevant Local Planning Authority Archaeological Advisors. Sufficient deposits/features will be investigated through hand excavation in each archaeological excavation area to record the horizontal and vertical complexity of the stratigraphic sequence to the level of underlying sterile geological strata. Excavation will also target the inter-relationships between features and major feature intersections to understand and record their relationships.*	Should consent be granted for this NSIP, the discharging authority would be the Local Planning Authority. As advisors to the LPA the Local Planning Authority Archaeological Advisors (LPAAA) will assess whether the works to be undertaken/undertaken meets the appropriate standards. Therefore, National Grid are not suited to determine the suitability of their own work. We would recommend the following amendment: "Archaeological features, layers or deposits identified for excavation will be hand excavated in an archaeologically controlled and stratigraphic manner, to meet the aims and objectives of the investigation as set out in the DWSIs. Where excavation of deep features or deposits is required, a methodology to achieve this will be agreed by the relevant LPAAA in consultation with National Grid, Historic England and other relevant stakeholders. This may take the form of machine assisted excavation following suitable hand investigation. All deposits/features will be investigated through hand excavation in each archaeological excavation area to record the horizontal and vertical complexity of the stratigraphic sequence to the level of underlying sterile geological strata.	Text edited as requested	No further comments

		Excavation will also target the inter-relationships between features and major feature intersections to understand and record their relationships.”		
10.127	*5.3.64* *The excavation sampling strategy will be dictated by the significance of the remains, their stratigraphic complexity and their artefactual and palaeoenvironmental content (including absence of artefactual content). The Archaeological Contractor(s), in consultation with National Grid, the relevant Local Planning Authority Archaeological Advisors and, if appropriate,*	We would recommend the following amendment to clarify this paragraph: The excavation sampling strategy of individual features/deposits will be dictated by the significance of the remains, their stratigraphic complexity and their artefactual and palaeoenvironmental content (including absence of artefactual content). The Archaeological Contractor(s), in consultation with National Grid, the relevant Local Planning Authority Archaeological Advisors and, if appropriate, Historic England will describe in their DWSIs an appropriate	Text edited as requested	No further comment

	Historic England will describe in their DWSIs an appropriate sampling strategy as determined by the results of the archaeological evaluation and key research questions, prior to works commencing in the area to which the DWSI applies.	sampling strategy informed by the results of the archaeological evaluation and key research questions. DWSIs will be approved by the relevant LPAAA prior to works commencing in the area to which the DWSI applies.		
10.128	*5.3.65* *The strategy will be kept under review during the investigation. Site data, artefact and environmental sample processing will be undertaken whilst the investigation proceeds on site (including artefact spot-dating and preliminary assessment of environmental samples). Initially, the minimum sample sizes will be implemented on site by the Archaeological Contractor(s) in accordance with the approved DWSI. The reflexive process will allow the recovery of finds and samples for dating and assessment for their palaeoenvironmental and geoarchaeological potential.*	To clarify the procedure for deviating from the approved DWSI methodology, we propose the following amendment: "The excavation sampling strategy will remain under continuous review throughout all field investigations. The strategy outline in the approved DWSIs will be implemented unless otherwise agreed in writing by the relevant LPAAA. Site data, artifacts, and environmental samples will be processed as the investigation progresses. This should include provision for spot-dating of finds and preliminary assessment of environmental samples. Provision should be made within the DWSIs to employ a reflexive approach to recover additional finds and samples for radiocarbon dating and palaeoenvironmental or geoarchaeological analysis as needed. Any deviation from the approved DWSI strategy will be developed through regular	Text edited as requested	No further comment

	Changes to the strategy will be developed as an iterative process at site consultation meeting(s) between the Archaeological Contractor(s), National Grid, and the relevant Local Planning Authority Archaeological Advisors.	site consultation meetings involving project stakeholders and the relevant LPAAA and Historic England were required, and will require approval in writing by the relevant LPAAA."		
10.129	*5.3.66* *The following minimum sampling requirements will be used as a standard, within the iterative excavation sampling strategy; these may be varied to suit the research value of the remains, subject to agreement with National Grid, the relevant Local Planning Authority Archaeological Advisors and, if appropriate, Historic England at a site consultation meeting. The DWSI will identify the initial minimum sample for excavation.*	The Local Planning Authority Archaeological Advisors (LPAAA) will advise the discharging authority and will assess whether the works to be undertaken/ undertaken meets the appropriate standards. Therefore, National Grid are not suited to determine the suitability of their own work. We would recommend the following amendment: "The following minimum sampling requirements will be used as a standard, within the iterative excavation sampling strategy; these may be varied to suit the research value of the remains, subject to agreement with the relevant Local Planning	Text edited as requested	No further comment

		Authority Archaeological Advisors and, if appropriate, Historic England at a site consultation meeting with National Grid and relevant Stakeholders. The DWSI will identify the minimum sample for excavation."		
10.13	*5.3.67* *Sufficient sections though linear features will be targeted in key locations to address research questions. It may be necessary to increase percentage excavation to address research questions where a higher volume sample would achieve this. Segments will be hand excavated along the length of the feature to understand its depositional sequence and character. Each segment will be not less than 1 m long and will be regularly spaced along its length. Segments will be located away from intersections with*	The purpose of archaeological interventions into features is to characterise the feature. Anywhere where ditches interact with other features (including other ditches), these will need to be investigated to provide a stratigraphic relationship. We would recommend the following amendment: "The DWSIs will detail the minimum requirement for investigating linear features, sufficient numbers of sections though linear features will be targeted to fully characterise the archaeological feature. It may be necessary to increase percentage excavation to address research questions where a higher volume sample would achieve this.	Text edited as requested	No further comment

	other features, although key intersections will also be targeted to provide an understanding of the deposit sequence and the relationship between different feature types/classes. All ditch ends will be investigated. A minimum of 10% of each linear feature will be excavated (increasing to 40% for enclosure ditches and 100% for smaller curvilinear features).	Segments will be hand excavated along the length of the feature to understand its depositional sequence and character. Each segment will be not less than 1 m long and will be regularly spaced along its length. Segments will be located away from intersections with other features, although intersections will also be targeted to provide an understanding of the deposit sequence and the relationship between different feature types/classes. All ditch termini will be investigated. A minimum of 10% of each linear feature will be excavated (increasing up to 50% for enclosure ditches unless otherwise agreed with the relevant LPAAA) and provision for 100% excavation for ditches with burial or structural context."		
10.131	*5.3.68* *Pits, post-holes and other isolated features (including natural features that have been shown to contain significant archaeological remains) will normally be completely (100%) excavated (unless otherwise agreed in consultation with National Grid, and the Local Planning Authority Archaeological Advisors. Half-sectioning (50%) of general features may be excavated and*	We would recommend the following amendment: Pits, post-holes and other discrete features (including presumed natural features) will be half-sectioning (50% excavated) as a minimum. There will be provision to fully excavate (100% excavate) where significant archaeological remains have been identified or to address research questions. Structural post-holes will be 100% excavated and sampled to recover evidence to aid in the dating and use of structures.	Text edited as requested	No further comment

	sampled for environmental evidence as a minimum, in consultation with National Grid and the Local Planning Authority Archaeological Advisors, subject to the significance of the remains and the research questions identified in the DWSIs.			

10.132	*5.3.69* *Buried ground surfaces, floor surfaces and hearths have the potential to contain important remains, including finds distributions, ecofacts and palaeoenvironmental remains. It may be possible to recognise individual turves or deposits representing dumped material; if laminated sequences are identified e.g. turves, the Geoarchaeologist will attend site with the Environmental Specialist to devise a sampling strategy, which may include recovery of monoliths. Grid sampling and bulk sampling may be adopted depending upon the significance of the remains and the research questions identified in the DWSIs. Hearths and areas of in situ burning will be completely excavated (in plan or by quadrant) and sampled for palaeoenvironmental remains and to recover material suitable for scientific dating, such as archaeo-magnetic dating, to address key research aims.*	This needs to be separated into different topics as methodology for investigating Buried Ground Surfaces, floor surfaces and hearths is very different from one another. We would recommend the following: **Buried soils (ground surfaces)** Buried soils have the potential to contain important archaeological remains, including finds distributions, ecofacts and palaeoenvironmental evidence. Where buried soils are identified, a suitably qualified geoarchaeologist and environmental specialist will design an excavation and sampling methodology in consultation and agreement with the relevant LPAAA and Historic England where appropriate. **Floor surfaces and working surfaces (this could be included in the section on structures)** Floor surfaces and working surfaces relate to structural remains and have the potential to contain important archaeological remains, including finds distributions, ecofacts and palaeoenvironmental evidence which will inform on the date and use of the structure. Where floor surfaces and working surfaces are encountered, these will be excavated in grids and should be fully excavated (100% excavated) by hand. There is potential for stratigraphic sequences of multiple floor surfaces and working surfaces, the	Text edited as requested	SCCAS welcome the inclusion. No further comment

		excavation methodology must account for this. **Hearths, Ovens, Kiln structures** Heat effected features, such as Hearths, Ovens, Kilns etc. will need a careful and specific excavation methodology. Once features have been identified on site, the potential need for archaeomagnetic dating should be assessed prior to the feature being excavated, to allow time to gather control samples before the excavation process. Features will be hand excavated to fully characterise and achieve 100% recovery of remains. Appropriate samples must be taken, to address research questions and identify the nature of the feature. There will be provision to consult the Historic England Regional Science Advisor for advice on specific sampling strategies and dating techniques.		

10.133	*5.3.70* *Where structured deposits or animal bone groups are identified during excavation, the Archaeological Contractor(s) will follow Historic England guidance Animal Bones and Archaeology: Recovery to archive (Baker and Worley, 2019) and will consult with National Grid and the Local Planning Authority Archaeological Advisors and where appropriate Historic England.*	Structured deposits and animal bone groups require different approaches to excavate. For example animal bone groups might include retting pits or pits containing waste from horn core working or midden. Where structured deposits will contain animal burial, possible human burial and other artefacts in structured sequences. We would recommend the following: **Animal bone groups** Where animal bone groups are identified during excavation, the Archaeological Contractor(s) will follow Historic England guidance Animal Bones and Archaeology: Recovery to archive (Baker and Worley, 2019). Sufficient sampling to extrapolate total quantities and understand the nature of the deposit(s). Where animal bone groups are identified the excavation and sampling strategy should be designed in by a qualified animal bone specialist and environmental specialist in consultation with the relevant LPAAA and where required Historic England. **Structured Deposits** Where features are identified to contain structured deposition of archaeological remains and artefacts (including Human and/or animal bone). A methodology for excavation of the feature should be developed which fully records the location and stratigraphic sequences of the	Text edited as requested	SCCAS welcome the inclusion. No further comment

		structured deposition, this will require three-dimensional recording and can be assisted by photogrammetry and will require 100% sampling of each stratigraphic layer. The excavation and sampling methodology will need to be agreed by the relevant LPAAA and where relevant Historic England.		
Structures				
10.134	5.3.71 *"Each structure, including stone structures, will be investigated/sampled to define the extent, form, stratigraphic complexity and depth of the component features and its associated deposits. Intersections between components will be investigated to determine their*	We would recommend the following minor amendment: Each structure, including stone structures and foundations, will be investigated and sampled to define the extent, form, stratigraphic complexity and depth of the component features and its associated deposits. Intersections between components will be investigated to determine their relationship(s). Particular	Text edited as requested	No further comment

	relationship(s). Particular care will be taken to ensure that areas of in situ burning are not investigated prior to the consideration of scientific dating."	care will be taken to ensure that areas of in situ burning are not investigated prior to the consideration of scientific dating.		
10.135	5.3.72 "If dwelling structures are found or suspected after topsoil stripping, careful hand cleaning will be undertaken at the level of initial definition to establish the full extent of the structure and any associated or related contemporary features, to understand its complexity, state of preservation, significance and to contribute to answering research questions set out in the DWSIs. It may be necessary to re-clean areas to achieve an acceptable level of feature definition. Features/contexts that are part of the structure or which may have contributed to its construction (such as drip gullies, post holes, internal or external surfaces, hearths, etc.) will be 100% excavated.	We would recommend the following amendment as not all structures will be dwellings e.g. industrial structures, religious structures. "Where structures are found or suspected after topsoil stripping, machine excavation will stop and careful hand cleaning will be undertaken at the level of initial definition to establish the full extent of the structure and any associated or related contemporary features, to understand its complexity, state of preservation, significance and to contribute to answering research questions set out in the DWSIs. It may be necessary to re-clean areas to achieve an acceptable level of feature definition. Features/contexts that are part of the structure or which may have contributed to its construction (such as drip gullies, post holes, internal or external surfaces, hearths, etc.) will be 100% excavated. Contexts will be routinely sampled for ecofacts, palaeoenvironmental	Text edited as requested	No further comment

	Contexts will be routinely sampled for ecofacts, palaeoenvironmental remains and dating material."	remains and dating material."		
10.136	5.3.73 "The hand excavation of wells, or similar deep structures, will only proceed following a safe working practice, as required by national health and safety guidance, and as recorded in the DWSI to be prepared by the Archaeological Contractor(s) and approved by National Grid, the ACoW and the relevant Main Works Contractor(s). Preliminary hand augering of potential deep deposits may be able to identify depth and would inform an excavation strategy which may include machine excavation or stepping-out to	The AMS-OWSI needs provision for working at depth, regardless of the feature type. This also should include provision for removal of water from features/sites, stepping of excavation slots and/or shuttering of deep excavation to allow safe hand excavation and recording of archaeology. We would recommend the following amendment: The hand excavation of wells, or similar deep structures, will only proceed following design of a suitable safe working practice methodology, as required by national health and safety guidance, and as recorded in the DWSI to be prepared by the Archaeological Contractor(s) and approved by National Grid, the ACoW and the relevant Main Works Contractor(s). Preliminary hand augering of	Text edited as requested	No further comment

	ensure that there is no depth restriction in areas subject to archaeological mitigation. The excavation sampling strategy will be developed at site consultation meeting(s) between the Archaeological Contractor(s), National Grid, and the relevant Local Planning Authority Archaeological Advisors and where appropriate Historic England."	potential deep deposits may be able to identify depth and would inform an excavation strategy which may include machine excavation or stepping-out to ensure that there is no depth restriction in areas subject to archaeological mitigation. The excavation sampling strategy will be developed at site consultation meeting(s) between the Archaeological Contractor(s), National Grid, and the relevant Local Planning Authority Archaeological Advisors and where appropriate Historic England.		
Burials				

10.137	5.3.74 Burials	This requires further information, or should be included in the Human Remains section, as Burials covers the controlled investigation of burial features and funerary contexts (e.g. grave cuts, burial fills and associated grave goods). Furthermore, more detail is required on what the procedure would be when suspected burial or burials are identified and believed to extend beyond the area defined for excavation. There would need to be provision in the DWSIs for a minimum 20m buffer from the last burial within an area of impact and order limits to ensure that the extent of the cemetery/ burial group has been defined and can be appropriately mitigated. The project team must include the relevant expertise and capacity from the outset: this must include specialists in **mineral-preserved textiles and other MPOs (Mineral Preserved Organics)**, an **archaeological conservator** with access to the necessary laboratory space and equipment, and the appropriate **academic advice**, oversight and co-ordination. These specialists must be included in the archaeological contractor(s) specialist list and consulted before excavation begins on research potential and approaches and agree appropriate recording and retrieval strategies for the DWSI. Please reference the relevant sections with the AMS-OWSI rather than say "below" refers	Text edited as requested	5.3.108 – Can you add in body stains/shadows into this paragraph, as due to the acidic nature of many Suffolk soils, bone preservation is poor, but there are instances where human remains survive as body stains or shadows in the base of the grave. Where body stains/shadows are present the excavation strategy would need to be amended. I would recommend adding in the following as a separate paragraph as to not blur the line between biological remains and evidence of a body/burial: **the DWSIs will also include provision for the identification, excavation, recording and sampling of body stains/shadows, coffin remains and coffin stains/shadows where they exist.** 5.3.113 – this paragraph should be amended to include the following: *Where artefacts are identified within the burial context, additional specialist advice* **will** *be sought with regards to the potential for*

		to the excavation of human remains, which denotes biological material. NB due to the acidic nature of many soil types in Suffolk, bone preservation is relatively poor and, in some instance, does not survive. There should also be adequate provision for the excavation and recording of body stains and/or body shadows, as well as coffins and coffin shadows We would therefore recommend the following amendment: Burials (including features suspected of being burials) will be investigated in accordance with a strategy detailed in the DWSIs for the excavation of burials and the recovery of human remains. A methodology for the recovery of human remains is expanded upon in the Strategy for the Recovery of Human Remains section below (5.3.XX-XXX).		*mineral-preserved organics*, **including mineral-preserved textiles and other organic materials preserved on or in proximity to metal artefacts.** *Appropriate block lifting, sampling*, **conservation and laboratory excavation will** *be* **undertaken** *where required*. **This will be carried out in accordance with relevant guidance, including the SCCAS *Excavating Inhumations for Mineral Preserved Organics Guidance* (reviewed April 2026), and in consultation with the human remains specialist, archaeological conservator and relevant finds/MPO specialists.** This adds clarity and consultation with relevant specialists including the archaeological conservator and finds/MPO specialists. **NB**. Experience from other sites in Suffolk indicates that block lifting of metal grave goods can reduce the time required for on-site burial excavation, as detailed excavation of the metal artefacts

				and associated deposits can be undertaken off site under controlled laboratory conditions. Block lifting can also enable the identification of "ghost objects", which survive only as corrosion products within the surrounding soil block.
Tree Hollows				

10.138	5.3.75 *"Tree hollows, where encountered, may relate to historic ploughing, topography and drainage, or possibly to specific prehistoric land use. The distribution of tree hollows has potential to contribute to studies of landscape evolution and change across the landscape. The comprehensive mapping and investigation of a representative sample of tree hollows for artefactual, ecofactual and palaeoenvironmental evidence is therefore proposed, comprising:* · *Mapping of all possible tree hollows encountered in mitigation areas (i.e. Interpretation)* · *Archaeological excavation of a sample of confirmed tree hollows* · *Recovery of a sample of the fill of excavated tree hollows to be sieved for small artefact recovery. If sieving produces*	Tree hollows, where encountered, may relate to historic ploughing, topography and drainage, or possibly to specific prehistoric land use. The distribution of tree hollows has potential to contribute to studies of landscape evolution and change across the landscape. The comprehensive mapping and investigation of a representative sample of tree hollows for artefactual, ecofactual and palaeoenvironmental evidence is therefore proposed, comprising: · Mapping of all possible tree hollows encountered in mitigation areas (i.e. Interpretation) · Archaeological excavation of a sample of potential tree hollows to assess the archaeological significance of these features within the excavation area, and inform a full mitigation strategy in consultation with the relevant LPAAA and Historic England where appropriate. · Recovery of a sample of the fill of excavated tree hollows to be sieved for small artefact recovery. A proportion of samples will be wet-sieved to identify whether significant ecofacts e.g. grains, hazelnut shells are present to inform a full sampling strategy.	Text edited as requested	No further comment

	significant quantities of settlement debris, particularly hazelnut shell, then flotation samples will also be processed"			
Recording				
10.139	5.3.78 *"A full written, drawn and photographic record will be made of the archaeological remains, in accordance with the Archaeological Contractor(s)'s recording system and standard archaeological methodologies."*	This should include the following: A full written, drawn and photographic record will be made of the archaeological remains, in accordance with the Archaeological Contractor(s)'s recording system, ~~and~~ standard archaeological methodologies and national and local guidance. Details of the recording system to be used must be included in the DWSIs.	Text edited as requested	No further comment

10.140	*5.3.79* *"The Archaeological Contractor(s) will be expected to use digital recording methods to ensure the smoothest transfer of information between the on-site work and the Local Planning Authority Archaeological Advisors."*	This needs further details: The Archaeological Contractor(s) will be expected to use digital recording methods to ensure the smoothest transfer of information between the on-site work and the Local Planning Authority Archaeological Advisors. Digital records will be backed up daily to ensure that no data is lost due to technical issues. Where digital recording is un-deliverable, manual recording by paper record and hand-drawn sections and plans will be substituted. All written records and hand drawn plans will be tied to the Ordnance Survey Datum.	Text edited as requested	No further comment
10.141	5.3.81 *"Site photography will be used to record all archaeological remains that are under investigation. In addition, photographs will be taken to assist in interpretation and publication, and to give an overview of the site, the progress of the investigations and site activities. Overhead (drone) photography will also be used to record progress, relationships between structures and to put the investigations within a wider landscape context. Particular attention will be paid to*	This needs further details to expand on to set the minimum standards for photographic equipment, to ensure an appropriate photographic record of the work is undertaken, please include: A photographic record of the work is to be made, consisting of high-resolution digital images. All cameras must have sensors of APS-C (or larger) and all images must be at least 10 megapixels in size. All digital images for archiving purposes must be high quality non-altered RAW files (.DNG) or TIFF images. JPG images must not be used for archiving.	Text edited as requested	No further comment

	obtaining photographs suitable for displays, exhibitions and other publicity material, dependent on Health and Safety considerations."			
Environmental Sampling Strategy				
10.142	5.3.82 *"An Environmental Archaeology Coordinator will develop the detailed environmental sampling strategy in consultation with all relevant specialists and will oversee the work at the fieldwork stage. The Environmental Archaeology Coordinator will liaise with the variety of specialists who may be involved, to develop fully the strategy and tactics for environmental research and to ensure the smooth running of this aspect of the investigations. The nominated Coordinator may be a member of the Archaeological Contractor(s)'s specialist team responsible for a*	To clarify this paragraph and the role of the Environmental Archaeology Coordinator we would recommend the following amendment: An Environmental Archaeology Coordinator will be appointed to develop, manage and oversee all aspects of the environmental sampling strategy. Their core responsibilities will include: · Consulting with qualified environmental specialists, the Local Planning Authority Archaeological Advisors (LPAAA) and Historic England (as required) to define sampling methodologies and research aims · Supervising the implementation of the strategy during fieldwork to ensure methodological consistency and data quality	Text edited as requested	No further comment

	particular aspect of the proposed work (such as geoarchaeologist), with suitable experience and training and the ability to convey accurate information about a site and the deposits to specialists. The Environmental Archaeology Coordinator will be present at site visits and meetings with National Grid, and Local Planning Authority Archaeological Advisors as necessary."	· Liaising with the archaeological contractor's specialist team, of which they may be a member, to coordinate resources and maintain smooth progress The nominated Coordinator must hold formal qualifications and demonstrable experience in environmental archaeology. They will also attend site visits and stakeholder meetings with National Grid and the LPAAA, where required, to integrate sampling activities into the wider palaeoenvironmental framework and address any emerging issues.		
10.143	*5.3.83* *"The Environmental Archaeology Coordinator will take charge of the routine processing of samples and the supervision of routine sampling in connection with the investigations."*	We would recommend the following amendment: The Environmental Archaeology Coordinator will oversee all routine sample collection and manage the subsequent processing of environmental samples throughout the investigations.	Text edited as requested	No further comment

10.144	*5.3.84* *"The detailed environmental sampling strategy for each DWSI will be based upon the results of previous assessment work and the potential of the materials to address key research questions. Specialists (such as a zooarchaeologist for animal bones, archaeobotanist for charred plant remains, archaeomalacologist for molluscs), National Grid, the relevant Historic England Regional Science Advisor and Local Planning Authority Archaeological Advisors will be consulted regarding site specific requirements."*	We would recommend the following amendment for clarity: Each Detailed Written Scheme of Investigation (DWSI) will include an environmental sampling strategy informed by previous assessment results. The Environmental Archaeology Coordinator will develop this strategy in consultation with specialists such as (but not limited to) zooarchaeologists for animal bones, archaeobotanists for charred plant remains, and archaeomalacologists for molluscs, as well as National Grid, the Historic England Regional Science Advisor, and Local Planning Authority Archaeological Advisors to establish site-specific requirements. The strategy will remain adaptable throughout excavation; as new evidence and deposits emerge, sampling methods, priorities, and coverage will be reviewed and refined to ensure all key research questions are addressed.	Text edited as requested	No further comment

10.145	5.3.85 *"Environmental sampling will be carried out in accordance with current national guidelines including Environmental Archaeology: A Guide to the Theory and Practice of Methods, from Sampling and Recovery to Post-Excavation (English Heritage, 2011), Geoarchaeology, Using earth sciences to understand the archaeological record (Historic England, 2015b), and the current CIfA Standard and guidance for the collection, documentation, conservation and research of archaeological materials (CIfA, 2020a)."*	Environmental sampling will adhere to current national and local guidance, including (but not limited to): · Historic England (2025) Environmental Archaeology: A Guide to the Theory and Practice of Methods, from Sampling and Recovery to Post-Excavation (3rd edition). Supersedes - English Heritage, Environmental Archaeology: A Guide to the Theory and Practice of Methods, from Sampling and Recovery to Post-Excavation (2011) · Historic England, Geoarchaeology: Using Earth Sciences to Understand the Archaeological Record (2015) · CIfA Standard and Guidance for the Collection, Documentation, Conservation and Research of Archaeological Materials (2020) · Relevant Historic England Good Practice Advice and CIfA standards for field evaluation, excavation, and post-excavation reporting Where necessary, specialist guidance (for example) for archaeobotany, zooarchaeology, osteoarchaeology, geoarchaeology or waterlogged deposits, will be integrated to ensure all phases of sampling, recovery and analysis meet professional quality and consistency.	Text edited as requested	No further comment

10.146	5.3.86 *"The processing of samples and their assessment will feed back into the sampling strategy that is employed in the field. The processing and initial assessment of all samples (except for specialist samples) would be undertaken at a site compound to facilitate the rapid feedback to the field team. Processing will be supervised by the Archaeological Contractor(s)'s finds coordinator/processing specialist."*	We would recommend the following amendments to add in the Environmental Archaeology Coordinator, as set out in 5.3.82 and it is unlikely that there would be on site facilities to undertake environmental sample processing on site, such as wet-sieve and floatation as this would need suitable facilities to deal with waste water and silt generated, therefore we would recommend the following amendments, as this doesn't limit the processing of samples to onsite only: The processing of samples and their initial assessment will feed back into the sampling strategy that is employed in the field. Except for specialist samples, the processing and initial assessment of environmental samples would be undertaken during the archaeological fieldwork to facilitate the rapid feedback to the field team. Processing will be supervised by the Archaeological Contractor(s) Environmental Archaeology Coordinator and relevant specialists as required.	Text edited as requested	No further comment

10.147	5.3.87 *"All flotation samples and coarse sieved samples should be processed and assessed to inform the sampling strategy within a timescale agreed between the Archaeological Contractor(s) and National Grid, but not greater than two weeks, except for specialist samples which will need a specific approach. Finds, ecofacts and biological artefacts from sample residues should be recorded to sample fraction."*	This section needs to separate flotation and coarse sieving into two sections, as these require different approaches, one that can be delivered on site and one that will need specific facilities to deliver it. Please see below definitions of both strategies: **Coarse Sieved Samples** Following consultation and agreement with the relevant LPAAA, coarse sieving may be employed to recover small or fragmented bones, larger Mollusca, substantial charcoal fragments, robust plant macrofossils (e.g., hazelnut shell fragments, fruit stones, and pips), and some wood. However, coarse sieving is not appropriate as the sole method of sample processing and **will not reliably retrieve the full range of palaeoenvironmental and bioarchaeological material** present within archaeological deposits. Coarse sieved samples are usually sieved on a minimum sieve mesh size of 2mm. Samples may be processed dry or wet, subject to prevailing soil conditions. Coarse sieving is typically used on deposits rich in larger animal bone or shell, which are readily retained by sieves of this aperture. Full recovery requires smaller mesh apertures, which require Flotation sample processing. **Floatation** Flotation sampling enables the recovery of charred and mineralised plant macrofossils,	Text edited as requested	No further comment

		charcoal fragments, and small bones from well-drained deposits. Larger, denser remains are retained in the wet-sieved residues generated by the flotation process. Sample volumes should be a minimum of 40L (as per Historic England Guidance) or more may be taken due to feature/deposit significance and where context size allows, whereas smaller contexts should be completely sampled. Sample size and strategy should be agreed with specialists during project planning, based on expected preservation, frequency, and fragment size. Where facilities permit (water supply, drainage, silt disposal, drying space), flotation processing can be carried out at the site compound. Molluscan shells are generally processed in the laboratory using 0.5 mm sieves. All residues must then be carefully examined for any remains not captured by the sieves. Flotation operates by washing samples through sieves of decreasing mesh size, retaining both the float (the flot) and the residue. Two methods are employed: · Hand flotation · Machine flotation (water pumped from below) Standard mesh sizes: · Flot collection: 300 µm; 500 µm; 1 mm · Residue collection: 1 mm or 2 mm (use 500 µm if mineralised remains are anticipated)		

		Both the flot and residue are typically sorted under a microscope to maximise recovery of bioarchaeological materials. Therefore, we recommend the following: All environmental samples will be processed and assessed unless otherwise agreed with the relevant LPAAA and Historic England (where required). Initial samples will be processed and assessed to inform the sampling strategy within an agreed timescale, agreed between National Grid, Archaeological Contractor(s), the relevant LPAAA and Historic England (where required). Realistic timescales for initial sample processing will be detailed within the DWSIs.		

10.148	5.3.88 *"The aims of the environmental strategy will be to address the Research Framework. Site based studies that could aid the investigations will include the following (this list is not exhaustive, and other studies may be relevant):* · *Pedological (including micromorphology) study of soils (or other suitable deposits) deeply buried beneath or within colluvium would provide information relating to the status of the soil at the time of burial and should be able to detect and characterise aspects of previous land use and will provide information on erosion and on the contribution of colluvium and wind-borne material to the soil* · *Pollen and diatom/phytolith analysis* · *Detailed wet sieving/flotation of buried ground surfaces and other selected contexts and features for the recovery of charcoal/wood, plant macrofossils, small animal*	The aim of the environmental strategy will be to examine the environmental evidence produced by the archaeological works. This will be informed by the Regional Research Frameworks, but will not be limited to specific research questions. We would advise the following amendment: The aims of the environmental strategy will be to examine the environmental evidence produced by the archaeological works. Site based studies that could aid the investigations will include the following (this list is not exhaustive, and other studies may be relevant).... Keep the rest! The descriptions of the types of Environmental sampling could be discussed separately.	Text edited as requested	No further comment

	bones, molluscs, coleoptera, small artefacts, etc. The retrieval of a reliable sample will be achieved by the routine sampling of a set proportion of each selected context/deposit excavated. Sampling will also be systematic and extensive."			
10.149	5.3.90 "If organic rich archaeological remains are encountered during the investigations, the Environmental Archaeology Coordinator will be contacted for advice and to devise an "If organic rich archaeological remains are encountered during the investigations, the Environmental Archaeology Coordinator will be contacted	This needs to include the following: If organic-rich archaeological remains are encountered during the investigations, the Environmental Archaeology Coordinator will be contacted for advice and to devise an appropriate excavation and sampling strategy. The Archaeological Contractor(s) will inform the Archaeological Clerk of Works (ACoW) immediately, who will then notify the Main Works Contractor(s) and National Grid. All proposed strategies must be developed in	Text edited as requested	No further comment

	for advice and to devise an appropriate strategy for excavation and sampling. In addition, the Archaeological Contractor(s) will inform the ACoW immediately, who will then notify the Main Works Contractor(s) and National Grid."	consultation with, and agreed by, the Local Planning Authority Archaeological Advisor (LPAAA).		

10.15	5.3.91 *"Environmental assessment at the reporting stage will include consideration of scientific methodologies alongside traditional recording. For example, zooarchaeological assessment will include the potential of biomolecular methodologies where there is a clear research question which could be addressed through biomolecular analysis, determined through the assessment of animal bones. The Archaeological Contractor(s) will consult with National Grid, the relevant Local Planning Authority Archaeological Advisors and the Historic England Regional Science Advisor. National Grid will approve the proposals for scientific study at the assessment and analysis stages, in consultation with the relevant Local Planning Authority Archaeological Advisors and the Historic England Regional Science Advisor. Samples for radiocarbon dating will be*	Should consent be granted for this NSIP, the discharging authority would be the Local Planning Authority. As advisors to the LPA the Local Planning Authority Archaeological Advisors (LPAAA) will assess whether the works to be undertaken/undertaken meets the appropriate standards. National Grid and their advisors will be consulted, but National Grid or other project stakeholders cannot determine the scope of any analysis and assessment of the work to mitigate the impacts of their development. Therefore, we would recommend the following amendment: At the post-excavation assessment (PXA) reporting stage, the Environmental Assessment will contribute to the understanding of the archaeology and site formation processes, and inform the development of strategy for further investigation, detailed within the Updated Project Design (UPD). For example, zooarchaeological assessment at the PXA reporting stage will include the potential of biomolecular methodologies where there is a clear research question which could be addressed through biomolecular analysis, determined through the assessment of animal bones, and detailed within the UPD.	Text edited as requested	No further comment

	identified from material sampled for environmental analyses."	Samples for radiocarbon dating will be identified from material sampled for environmental analyses during the post-excavation assessment stage, and detailed for full analysis in the UPD. The Archaeological Contractor(s) will consult with National Grid, the relevant Local Planning Authority Archaeological Advisors and the Historic England Regional Science Advisor throughout the post-excavation assessment process to develop a programme of further investigation and reporting detailed in the UPD. The UPD will be submitted for approval with the relevant LPA in consultation with the relevant LPAAA and, where required, Historic England.		
Strategy for Scientific Dating				

11.151	*5.3.92* *"Statistical modelling will be combined with a comprehensive scientific dating programme and the archaeological evidence to address the aims and objectives identified in the DWSIs. Each Scientific Dating Specialist will develop the detailed strategy for scientific dating in consultation with all relevant specialists, the Historic England Regional Science Advisor, the relevant Local Planning Authority Archaeological Advisors and National Grid. The Scientific Dating Specialist will devise a strategy (prior to the commencement of the works to which the dating strategy will apply) so that it can be incorporated into the DWSIs to ensure that the right contexts are excavated and to ensure a comprehensive programme of scientific dating is possible, with specific research objectives. Although scientific dating will be undertaken at post-excavation it will also be prioritised at the fieldwork stage to inform decision making and develop*	This is confused. The DWSIs will set out provision for scientific dating, and the provision for spot dates (using multiple dating methods, which can include scientific dating). Scientific dating would also be undertaken at the post-excavation stage, in order to aid the development of an Updated Project Design (UPD), final reporting and refine dating, as recommended by relevant specialists and the relevant LPAAA and historic England where required. Therefore, the DWSI cannot detail the entire scope of dating that may be required, which will be informed by what is found on site. We recommend the following amendment to clarify the scientific dating strategy within the DWSI, fieldwork and post-excavation process: An initial scientific dating strategy will be developed by the scientific dating specialist, and this will be detailed in the DWSI. Where scientific dating is required during fieldwork stage to inform the scientific dating strategy or provide spot dates to inform the excavation strategy, the initial scientific dating strategy may need to be amended to reflect this. The Updated Project Design will set out the programme of a comprehensive scientific dating programme, based upon the results of the archaeological fieldwork and post-excavation assessment (PXA). At the Post-	Text edited as requested	5.3.14 should include the statement "**Appropriate scientific dating will be applied to deposits recovered as samples taken during geoarchaeological works to inform on significance of those deposits e.g. C-14 dating for organic deposits."**

	the strategies used on site."	excavation Assessment (PXA) reporting stage, each Scientific Dating Specialist will develop a detailed strategy for scientific dating in consultation with relevant specialists, the relevant LPAAA, Historic England and National Grid. The UPD will be submitted for approval with the relevant LPA in consultation with the relevant LPAAA and, where required, Historic England.		
11.152	*5.3.94* *"Scientific dating will also be utilised to provide spot dates to inform the excavation strategy, contribute to understanding of stratigraphic sequences, or to provide precision/resolution for statistical modelling. The Scientific Dating Specialist will provide advice and guidance throughout the life-cycle of the Project (preparation of the*	*For clarity:* *Scientific dating will also be utilised to provide spot dates to inform the excavation strategy, contribute to understanding of stratigraphic sequences, or to provide precision/resolution for statistical modelling. The Scientific Dating Specialist will provide advice and guidance throughout the life-cycle of the Project (preparation of the DWSIs, site investigations, and at the post-excavation assessment and analysis stages and production of the Updated Project*	Text edited as requested	No further comment

	DWSIs, site investigations, and at the post-excavation assessment and analysis stages). The Historic England Regional Science Advisor, the relevant Local Planning Authority Archaeological Advisors and National Grid will be consulted during preparation of the DWSI and during the Project."	*Design). The Historic England Regional Science Advisor, the relevant Local Planning Authority Archaeological Advisors and National Grid will be consulted during preparation of the DWSI, throughout the fieldwork, post-excavation stages, production and delivery of the UPD.*		
11.153	*5.3.95* *"Scientific dating techniques will include the following:* · *Radiocarbon (14 C) dating which can be used to date any carbon-based organic materials, such as wood, bone, or plant remains. If remnant peat is found, reliable and high-resolution dating will be essential and multiple methods will be employed unless otherwise justified* · *Luminescence dating for suitable features* · *Archaeomagnetic dating for highly fired structures such as kilns or ovens and burnt soil* · *A range of other absolute techniques, such as amino acid racemization, or*	Scientific dating techniques will include (but not limited to) the following: · Radiocarbon ~~(14 C)~~ dating (C-14) which can be used to date any carbon-based organic materials, such as wood, bone, or plant remains. If remnant peat is found, reliable and high-resolution dating will be essential and multiple methods will be employed unless otherwise justified · Luminescence dating for suitable features · Archaeomagnetic dating for highly fired structures such as kilns or ovens and in situ burning. · A range of other absolute techniques, such as amino acid racemization, or tephrochronology (dating volcanic ash from deposits) If preserved wood is present, for example, in waterlogged deposits then	Text edited as requested	No further comment

	tephrochronology (dating volcanic ash from deposits) · *If preserved wood is present, for example, in waterlogged deposits then dendrochronology may be able to provide precise and accurate dates."*	dendrochronology may be able to provide precise and accurate dates (suitable on-site provision to retain the wood in stable condition will be required).		

10.154	5.3.96 *"Scientific dating will be undertaken on the recovered samples in accordance with an explicit sampling strategy designed, in consultation with a chronological modelling specialist, to address the research questions set out in the Research Framework and the DWSI, using simulation of the results that could be obtained from the available samples and Bayesian chronological modelling to combine these with the other available information. A sequential sampling strategy will be adopted (Bayliss, 2009). Multiple laboratories/techniques will be employed to ensure that robust chronologies are produced. Different strands of evidence will be combined using formal statistical modelling to produce quantitative estimates for chronologies that address the Project objectives. Reporting will follow Historic England guidelines such as Historic England 2015c. The strategy will*	Should consent be granted for this NSIP, the discharging authority would be the Local Planning Authority. As advisors to the LPA the Local Planning Authority Archaeological Advisors (LPAAA) will assess whether the works to be undertaken/undertaken meets the appropriate standards. Therefore, National Grid are not suited to determine the suitability of a scientific dating strategy for their own work. Additionally, this needs to include reference to Historic England (2022) Radiocarbon Dating and Chronological Modelling. We would recommend the following amendment: Scientific dating will be undertaken on the recovered samples in accordance with an sampling strategy designed, in consultation with a scientific dating specialist and chronological modelling specialist, to address the research questions set out in the Research Framework and the DWSI, and any research questions identified during the excavation and post-excavation analysis process. This strategy should follow guidance set out in Historic England (2022) Radiocarbon Dating and Chronological Modelling and should be set out within an Updated Project Design.	Text edited as requested	No further comment

	be devised in consultation with the Historic England Regional Science Advisor, the relevant Local Planning Authority Archaeological Advisors and National Grid and will be approved by National Grid."	Multiple laboratories/techniques will be employed to ensure that robust chronologies are produced. Different strands of evidence will be combined using formal statistical modelling to produce quantitative estimates for chronologies that address the Project objectives. Reporting will follow Historic England guidelines such as Historic England 2015c. The strategy will be devised in consultation with the Historic England Regional Science Advisor, the relevant Local Planning Authority Archaeological Advisors and National Grid ~~and will be approved by National Grid~~."		
Strategy for the Recovery of Human Remains				

10.155	5.3.97 “The DWSIs will describe a detailed strategy for the investigation, treatment, recovery and assessment/analysis of human remains (neonate/young infants, inhumations, cremations, is articulated/charnel remains) which will be developed by the human remains specialist. Any investigation of human remains must comply with Article 23 of the Draft DCO (document reference 3.1). The investigation of human remains will be undertaken in accordance with national and local guidelines (Historic England, 2018; Advisory Panel on the Archaeology of Burials in England, 2017; Historic England, 2023; McKinley and Roberts, 1993; and McKinley and Brickley, 2004; SCCAS 2023a), under the guidance of the human remains specialist. If scattered cremated remains are present, for example in subsoil or colluvium, it may be necessary to use a combination	**Article 23** The approach to human remains recovered in an archaeological context (over 100 years old) should require the developer to obtain a Ministry of Justice Burial License under the 1857 burial act (section 25). The DWSIs would need to accommodate the exhumation or removal of buried human remains under a burial license from the Ministry of Justice. We would therefore recommend the following amendment to AMS/OWSI: The DWSIs will describe a detailed strategy for the investigation, treatment, recovery and assessment/analysis of human remains (neonate/young infants, inhumations, cremations, disarticulated/charnel remains) which will be developed by the human remains specialist. Any archaeological investigation of human remains must comply with section 25 of the 1857 Burial Act. The investigation of human remains will be undertaken in accordance with national and local guidelines (Historic England, 2018; Advisory Panel on the Archaeology of Burials in England, 2017; Historic England, 2023; McKinley and Roberts, 1993; and McKinley and Brickley, 2004; SCCAS 2023a), under the guidance of the human remains specialist. An appropriate methodology for the recovery	Text edited as requested	No further comment

	of methodologies and techniques (including sample sieving) to identify the source of the deposit. At the post-fieldwork stage (assessment and analysis) the Archaeological Contractor(s) will consider the application of modern scientific studies, such as DNA work and isotope analysis."	of cremated human remains will be developed and detailed in the DWSI. At the post-excavation assessment (PXA) stage the Archaeological Contractor(s) will consider the application of modern scientific studies, such as DNA work and isotope analysis. It is expected where other dating cannot be obtained for this material that C-14 will be applied. A programme of full assessment of human remains will be detailed in the Updated Project Design (UPD), which will be approved by the relevant LPAAA and where required Historic England.		

10.156	5.4.98 *"In the event of the discovery of human remains the Archaeological Contractor(s) will notify National Grid and the ACoW immediately. The ACoW will immediately notify the relevant Local Planning Authority Archaeological Advisors. Remains will be covered and protected and left in situ in the first instance, in accordance with current good practice."*	This requires further details: In the event of the discovery of human remains the Archaeological Contractor(s) will notify National Grid and the ACoW immediately. The ACoW will immediately notify the relevant Local Planning Authority Archaeological Advisors. Remains will be covered and protected and left in situ in the first instance, in accordance with current guidance. A strategy for recovery of remains will be developed, with reference to the DWSI, and in consultation with the LPAAA and Historic England where appropriate, and a licence from the Ministry of Justice will be applied for.	Text edited as requested	No further comment
10.157	5.3.99 *"In general, excavation of human remains will not extend beyond the limits of the investigation work area; however, it may be followed under the baulk so that it may be lifted in its entirety, provided this will not result in disturbance of further burials, or extend beyond the Order Limits."*	This is incorrect as the archaeological mitigation will need to mitigate the impacts of the development upon archaeology. Therefore, extensions to the excavation areas will be necessary where human remains are shown to or believed to, extend beyond the limits defined in the DWSI. Within the order limits, SCCAS typically recommend 20m extensions from last human burial to define the extent of burials, burial groups, cemeteries. Therefore, we recommend the following: The excavation of human remains should be in their entirety, therefore where human	Text edited as requested	No further comment

		remains are partially exposed, extensions to the excavation area will be required. Extensions for the purpose of mitigating human remains will follow national and local guidance, and a 20m archaeologically sterile area from the last human burial will be required to identify the presence/absence of further human remains, define the extent of burials, and mitigate the impacts of the development. Extensions would not exceed the project Order Limits.		
10.158	5.3.102 "*If grave goods are identified and are not subject to block lifting, additional specialist samples should be taken from the areas around the grave goods.*"	If grave-goods are identified, additional specialist advice should be sought with regards to the potential for Mineral Preserved Organics (MPO), guidance on this has been produced by SCCAS. We would therefore recommend the following amendment to clarify this: Where artefacts are identified within the burial context, additional specialist advice should be sought with regards to the potential for mineral preserved organics. Appropriate block lifting and sampling should be taken where required.	Text edited as requested	Check that SCCAS MPO guidance is referenced in document

10.159	5.3.103 *"Cremation deposits should be subject to sampling and assessment for charcoal, charred plant remains, artefacts and the recovery of human bone."*	These are human remains, cremation burials or suspected cremation will be 100% sampled. We therefore recommend the following amendment: Cremation deposits, or deposits suspected to contain cremated human material, will be subject to 100% excavation and sampling to enable assessment of charcoal, charred plant remains as well as recovery of artefacts and human bone at the post-excavation assessment (PXA) phase.	Text edited as requested	No further comment
10.16	5.3.104 "*Where un-urned cremations are suspected or identified, these will be subject to 100% sampling. Where large deposits of pyre debris are identified the human remains specialist will be contacted to devise an appropriate strategy for excavation and sampling. The strategy will be developed at site consultation meeting(s) between the Archaeological Contractor(s), National Grid, the relevant Historic England Regional Science Advisor and the relevant."*	This paragraph is unclear and appears to conflate un-urned cremations with pyre debris/locations. We would recommend the following amendment for clarity: ~~"Where un-urned cremations are suspected or identified, these will be subject to 100% sampling.~~ Where large deposits of pyre debris are identified the human remains specialist will be contacted to devise an appropriate strategy for excavation and sampling. The strategy will be developed in consultation with the Archaeological Contractor(s), National Grid, the relevant Historic England Regional Science Advisor and the relevant LPAAA. **NB** Bustum burials contain large amount of pyre debris along with the entire cremated individual.	Text edited as requested	No further comment

10.161	5.3.105 *"Local Planning Authority Archaeological Advisors. It may be beneficial to consider half sectioning the excavation of un-urned cremations to aid an understanding of the vertical distribution of the deposit; the deposit may then be excavated in spits."*	This is confusing. We would recommend the following to define the correct methodology for the excavation of un-urned cremations or features suspected to be cremation burials: Where un-urned cremation deposits are encountered or anticipated, each cremation or suspected cremation burial will first be half-sectioned in 5cm spits to document the depositional sequence and spatial distribution of cremated remains. Once this half-section is recorded, the feature will be excavated in full to its natural base continuing in 5cm spits until the entire feature has been excavated. Each of the 5cm samples will be retained as separate samples to inform on depositional sequences and concentration of bone.	Text edited as requested	
10.162	5.3.107 *"It is good practice to block lift cremation urns to allow for X-radiography and excavation under laboratory conditions. The conservator or field staff experienced in lifting cremation urns will be present when lifting takes place. In the first instance, the conservator will be contacted for advice."*	This should be amended to: Urned cremations will be block lifted to allow for X-radiography and excavation under laboratory conditions. The conservator or field staff experienced in lifting cremation urns will be present when lifting takes place. In the first instance, the conservator will be contacted for advice.	Text edited as requested	No further comment

10.163	5.3.108 *"In addition to traditional osteological recording, post-excavation osteological assessment will include consideration of recently developed microscopic, biomolecular, imaging and other methods for the study of human remains and the potential of these techniques to meet the research questions relevant to the Project. Where research questions of the Project and the aims and objectives identified in the DWSIs can be addressed through recently developed microscopic, biomolecular, imaging and other methods for the study of human remains, the Archaeological Contractor(s) will consult with National Grid, the Historic England Regional Science Advisor and the relevant Local Planning Authority Archaeological Advisors for further advice prior to analysis being undertaken. National Grid will approve the proposals for scientific study at the assessment and analysis stages."*	National Grid are not the appropriate authority to make decisions on the analysis and assessment of human remains. Please remove this from this paragraph. We recommend the following for clarification of the process during the post-excavation assessment phase: In addition to standard osteological recording, post-excavation assessment will evaluate advanced analytical techniques, including but not limited to, microscopic, biomolecular, imaging, and other emerging methods. To determine their potential to develop the project's research questions and develop a programme of full analysis and reporting in the Updated Project Design (UPD). The Archaeological Contractor(s) will consult National Grid, the Historic England Regional Science Advisor, and the relevant Local Planning Authority Archaeological Advisor.	Text edited as requested	The amended text is acceptable. No further comment

Strip, Map and Sample Excavation				
10.164	5.3.110 *"Strip, Map and Sample Excavation (SMS) is defined in Table 2.1. The following general approach will apply for SMS. Sites that require investigation by SMS are identified in DWSIs."*	Please see SCCAS comments on Table 2.1 section 4.3 (10.38 this table).	Noted	
10.165	5.3.111 *"Sites designated for SMS will be stripped with mechanical plant as set out in the DWSIs. Topsoil, subsoil or other overburden that does not contain material relevant to the research objectives will be removed to the correct archaeological horizon under archaeological supervision. The relevant horizon will be informed by the evaluation results, the research framework, and the research aims and objectives identified in the DWSIs. The sequencing of stripping, location of soil storage areas and arrangements for backfilling, together with other relevant logistical considerations, will be set out in a DWSI."*	This is confusing and doesn't add clarity of machine type to be used during archaeological works. We would recommend the following to clarify this process: Sites designated for SMS in the DWSI will be stripped by a suitably sized back-acting tracked excavator fitted with a toothless ditching bucket and operated by an experienced operator under the continuous supervision and direction of an experienced archaeologist; machine excavation will proceed to the first archaeological horizon with overburden continuously examined for artefacts and ecofacts, and metal-detector surveys carried out before, during and immediately after stripping and prior to any hand excavation of the horizon; topsoil, subsoil and other non-archaeological overburden will be kept separate, the depth of the archaeological horizon will be confirmed on site (informed by evaluation results where available), and the sequencing	Text edited as requested	No further comment

		of stripping, soil storage locations, backfilling and other logistics will be detailed in the DWSI.		
10.166	5.3.112 *"Following stripping, the exposed archaeological remains will be surveyed using electronic survey-grade equipment to create a detailed digital pre-excavation plan. In accordance with the research framework and the research objectives identified in the DWSIs, a strategy based on this plan will be implemented for hand excavation of key features to recover artefactual and scientific dating evidence. At the same time selected feature*	There is confusion here regarding the process of SMS excavation. We would recommend the following amendment to clarify the process of mitigation by SMS excavation: Following stripping, the exposed archaeological remains will be surveyed using electronic survey-grade equipment to create a detailed digital pre-excavation plan, to inform an excavation strategy which will be agreed with the relevant LPAAA and where required Historic England, in discussion with National Grid. The agreed strategy will be implemented for hand excavation of features/deposits to recover artefactual,	Text edited as requested	No further comment

	complexes would be subject to further hand excavation designed to resolve stratigraphic relationships."	stratigraphic, environmental and scientific dating evidence. The DWSI will set out provision for where complex features, complexes of features and/or significant archaeology is identified, excavation will follow the detailed excavation methodology.		
10.167	5.3.113 *"The proportion of features excavated will be determined by the significance of the remains, the research framework, and the site-specific research objectives developed in the DWSIs and in consultation with relevant specialists."*	The proportion of features excavated will need to be agreed with the relevant LPAAA and where required Historic England. Therefore, we would recommend the following: The proportion of features excavated will be determined by the significance of the remains, the research framework, and the site-specific research objectives developed in the DWSIs, and in consultation with relevant specialists and approved by the relevant LPAAA and where appropriate Historic England. Sufficient hand excavation must be undertaken to understand and characterise any features and deposits identified.	Text edited as requested	No further comment

10.168	5.3.114 *"The following minimum sampling requirements will be used as a standard, but these may be varied to suit the research value of the remains, subject to agreement between National Grid, the Archaeological Contractor(s), the ACoW and the relevant Local Planning Authority Archaeological Advisors and Historic England if required.* · *Linear features: A minimum sample in length not less than 1 m long, where the depositional sequence is consistent along the length. Linear features with complex variations of fill type will be sampled sufficiently to understand the sequence of deposition – a minimum of 10% along the length. If appropriate all intersections will be investigated to determine the relationships between features. All termini will be investigated* · *Discrete features: Pits, post-holes and other isolated features will normally be half-sectioned. If large pits or deposits (over 1.5 m diameter)*	This whole section is inappropriate for Strip, Map and Sample Excavation (SMS) methodology as the sample excavation strategy will be determined after the site has been opened and the archaeological resource can be quantified to determine level of excavation required to sufficiently characterise any features and deposits identified. Where significant archaeology is identified, those parts of the site will revert to the Detailed Excavation Methodology. Strip, Map and Sample Excavation (SMS) methodology is used to expose and quantify the archaeological resource within a given area before a programme of targeted excavation is determined, which will need to be agreed with the relevant LPAAA. Under an SMS methodology sufficient hand excavation will be undertaken to characterise features identified. For examples, field systems sufficient interventions will be targeting relationships and provide sufficient sections to record the form of the field system ditches. Where exposed archaeology or areas of archaeology are determined to be significant or greater complexity than expected the mitigation methodology for that area would need to transfer to a targeted Detailed Excavation methodology. This will subject a specified area to a higher level of	Text edited as requested	No further comment

	are encountered, then the sample excavated should be sufficient to define the extent and maximum depth of the feature and to achieve the objectives of the sampling but should not be less than 25% · *Structures: Each structure will be sampled sufficiently to define the extent form, stratigraphic complexity and depth of the component features and its associated deposits to achieve the objectives of the evaluation. All intersections will be investigated to determine the relationship(s) between the component features. The remains of all upstanding walls will be hand cleaned sufficient to understand their dimensions, extent, composition, sequence and relationships* · *Special or burnt features: These features should be the subject of 100% excavation. Such features will be identified during pre-excavation planning to enable the input and advice of appropriate archaeological specialists. Where in situ*	investigation and recording (as stated above in our comments on paragraphs 5.3.112 and 5.2.113). Therefore, the DWSIs must include clear triggers and procedures for the escalation from SMS to Detailed Excavation methodology. SMS is not a suitable methodology for all types of archaeology and cannot be used on the excavation of Human remains, flint scatters, structures, industrial features or other complex archaeology. **Therefore, we would recommend removal of this paragraph, as the requirements are detailed in the SCCAS amendments to paragraphs 5.3.112 and 5.2.113.** **NB** Ridge and Furrow cannot be identified in plan. For example, in Suffolk it is similar to Roman planting beds. Therefore, sufficient excavation and environmental sampling must be undertaken to characterise and date these features.		

	burning is identified no excavation shall take place until the possible recovery of samples for scientific dating has been considered. · *Flint scatters: These should be the subject of 100% excavation. Where associated with buried land surfaces, in situ flint scatters will require hand cleaning and will need to be spatially defined in three-dimension to determine the limits of the scatter within the area of investigation. All lithic artefacts with a Maximum Linear Dimension (MLD) of 10 mm will require three-dimensional plotting prior to recovery and individually bagged and recorded as registered finds. Non-tool fragments of less than the MLD should be bagged according to an appropriate spatial recording system consistent with context* · *Human remains: refer to paragraphs 5.3.98 –5.3.108* · *Tree hollows: refer to paragraph 5.3.76 above* · *Ridge and furrow: Ridge and furrow will only be recorded to*			

	note its alignment. No excavation of furrows is proposed."			
Geoarchaeological and Palaeoenvironmental Investigation				

10.169	5.3.115 *"Each area requiring geoarchaeological or palaeoenvironmental assessment should have an array of boreholes or cores, designed in a grid or transects as appropriate to ensure full evaluation across the area. This design should be undertaken by the Archaeological Contractor(s), who must have a geoarchaeologist and environmental specialists as part of the Project team. The borehole design must take into account the results of the evaluation excavations in ES Appendix 11.5: Trial Trenching Results Report (document reference 6.11.A5) and any geotechnical boreholes in the vicinity to maximise data recovery. The methodology, design and any revised or site-specific aims must be detailed in a DWSI to be prepared by the Archaeological Contractor(s)."*	We would recommend the following amendment: Areas requiring geoarchaeological or palaeoenvironmental assessment will be subject to investigation using boreholes and cores, laid out in grids or transects as appropriate to ensure comprehensive coverage. Sleeved cores should be recovered using a percussion coring rig, to facilitate full analysis of the deposits/sediments. Details and full methodology will be defined within the DWSI.	Text edited as requested	No further comment

10.17	5.3.116 "*Each borehole column will be recovered using a windowless sampling rig (for example a Terrier Drilling Rig, Dando Rig or for shallower deposits a power auger) that will be provided by the Main Works Contractor(s) and under the supervision of the Archaeological Contractor(s). The diameter of the borehole shall be approximately 100 mm and the core shall be recovered in plastic tubes (or an appropriate substitute).*"	The windowless sampling rig would be suitable for collecting shallow samples as well. Power Auger at shallow depths would not be suitable to allow for full analysis and dating of shallow sequences as sleeved samples must be retrieved. Additionally, two boreholes at each location will be required to allow for failure and retention for further analysis if required. We therefore recommend the following amendment: All borehole columns will be recovered using a windowless sampling rig (for example a Dando Terrier Rig) that will be provided by the Main Works Contractor(s) and under the supervision of the Archaeological Contractor(s). The diameter of the borehole shall be approximately 100mm and the core shall be recovered in plastic tubes (or an appropriate substitute). Two cores will be recovered in each location, to allow for failure and further analysis.	Following edit made: 5.3.126 Each borehole column will be recovered using a windowless sampling rig (for example a Terrier Drilling Rig, Dando Rig or for shallower deposits a power auger) that will be provided by the Main Works Contractor(s) and under the supervision of the Archaeological Contractor(s). The diameter of the borehole shall be approximately 100 mm and the core shall be recovered in plastic tubes (or an appropriate substitute). The number of cores to be recovered from each location will be specified in the DWSI.	Amended text is agreeable. No further comment
10.171	5.3.122 *"The core sample shall be sealed, labelled, transported as soon as practicable, and stored securely and in appropriate controlled conditions either on site (temporary) or off-site at the assessment stage. It may be*	This needs additional details: The core sample shall be sealed, labelled, transported as soon as practicable, and stored securely and in appropriate controlled conditions (refrigerated) either on site (temporary) or off-site at the assessment stage. It may be necessary to store the core	Text edited as requested	No further comment

	necessary to store the core long-term if it is likely to contribute to any future analyses."	long-term if it is likely to contribute to any future analyses. Facilities to achieve appropriate storage will be detailed in the DWSIs.		
10.172	5.3.123 *"Where warranted, areas identified for geoarchaeological assessment may be stripped to reveal archaeological features sealed by the colluvium. The requirement will be dependent upon the results of the boreholes and further focus of stripping can be achieved by controlled broad transect samples (2 m+). The results of this approach will guide the requirement for removal of overlying deposits by machine, which may need to be undertaken in stages for the exposure of contemporary surfaces and features over a wide area. The hand- excavated transects should be orientated perpendicular to the course of the streams in question, so that they capture in section*	This is confusing and in places incorrect, we would recommend the following for clarity: Where archaeological remains are suspected to be sealed by colluvium, alluvium, peats or other sediments. Appropriate techniques will be applied, including (but not limited to), boreholes and test pits to inform on depth and extent of buried archaeological remains. The results of this approach will guide the requirement for removal of overlying deposits by machine or hand, which may need to be undertaken in stages for the exposure of archaeological horizons and features over a wide area. Where palaeochannels are suspected/identified the hand-excavated transects should be orientated perpendicular to the course of the streams in question, so that they capture in section sedimentary processes such as colluviation and headland formation. In all cases, the requirement for work should detailed the DWSIs. guided by the Archaeological	Text edited as requested	No further comment

	sedimentary processes such as colluviation and headland formation. In all cases, the requirement for work should be guided by the Archaeological Contractor(s)'s geoarchaeologist."	Contractor(s)'s geoarchaeologist and agreed with the relevant LPAAA and Historic England where relevant.		
10.173	5.3.124 *"All work must be taken in line with guidance on Geoarchaeology (Historic England, 2015b) and Environmental Archaeology (English Heritage, 2011)."*	This should also include provision for consultation with the Historic England Regional Science advisor. And include reference to the 3rd draft edition of Historic England's Environmental Archaeology (currently under review). All work must be undertaken with the most recent guidance on environmental archaeology. We would therefore recommend the following: All work must be taken in line with guidance on Geoarchaeology (Historic England, 2015b), Environmental Archaeology (Historic England 2025 3rd edition). Provision will be included within the DWSIs for consultation with the Historic England Regional Science Advisors.	Text edited as requested	No further comment

10.174	5.3.125 *"A preliminary interpretation of the soil and sediment characteristics of the core will be made, including a summary of the stratigraphy that will characterise the deposit sequence and identify soil/ sediment formation processes. The description of each deposit will include sediment type, inclusions, colour, bedding and nature of contacts to overlying and underlying units. The report will also include appropriate lithological diagrams."*	This is something that would need to be agreed and detailed within the DWSIs.	Following edit made: A preliminary interpretation of the soil and sediment characteristics of the core will be made, including a summary of the stratigraphy that will characterise the deposit sequence and identify soil/ sediment formation processes. The scope and methodology for this work will be detailed in the Archaeological Contractor(s)'s DWSI and agreed with the relevant LPAAA and Historic England where relevant.	The amended text is agreeable. No further comment
10.175	5.3.126 "If suitable organic sediment is recovered from the core, samples will be taken for radiocarbon dating, to provide a dating framework for the stratigraphic sequence. The Archaeological Contractor(s) shall make provision for submitting a justified proposal and number of samples for radiocarbon dating."	This should also include provision for consultation with the Historic England Regional Science advisor.	Following edit made: "If suitable organic sediment is recovered from the core, samples will be taken for radiocarbon dating, to provide a dating framework for the stratigraphic sequence. The Archaeological Contractor(s) shall, following consultation with the Historic England Regional Science advisor, make provision for submitting a justified proposal and number of samples for radiocarbon dating."	The amended text is agreeable, no further comment

10.176	5.3.127 *"If suitable deposits exist, samples will be submitted for specialist assessment (pollen, diatom/ foraminifera) to identify the potential for past environmental reconstruction."*	Samples will need to be assessed by specialists to inform on the suitability of the samples to inform an appropriate mitigation strategy. Therefore, we would recommend the following amendment: Samples will be submitted for specialist assessment to define geoarchaeological and palaeoenvironmental objectives and mitigation aims, for example dating, landscape reconstruction, depositional sequencing, human impact and palaeoclimate indicators and, to determine the required analyses, minimum sample densities, reporting format and curation arrangements; analyses will include, but are not limited to, pollen, macrofossil and charcoal identification, diatoms/ foraminifera, phytoliths, chironomids, sedaDNA, geochemical profiling (XRF, Loss On Ignition) and grain-size analysis and appropriate dating of all sequences. Based on the results of the assessment stage, further geoarchaeological and palaeoenvironmental site investigations may be required and, provision for this will be set out in the DWSIs.	Text edited	This should also include consultation with the **Environmental Archaeology Coordinator** as detailed in paras. 5.3.89 – 5.3.102. To keep specialist advice and responsibilities for project delivery consistent.

10.177	5.3.128 *"An interim summary assessment report will be produced shortly after completion of the fieldwork to inform the design of any subsequent archaeological mitigation."*	Further details are required to secure an appropriate level of interim reporting to aid in the formulation of a suitable mitigation strategy. It is essential that sufficient scientific dating is available to determine the significance of deposits/sequences identified. Therefore, we would recommend the following amendment: An interim summary assessment report will be produced by a suitably qualified geoarchaeologist shortly after completion of the fieldwork, and include sufficient specialist analysis and scientific dating, to inform the design of any subsequent archaeological mitigation.	Text edited as requested	No further comment
10.178	5.3.129 *"The final geoarchaeological assessment report will illustrate the sub-surface topography and shall characterise the sediments present on the site and indicate the potential of the core sample taken for environmental reconstruction. If appropriate, it will include a fully justified and costed proposal for analysis and publication."*	This should a post-excavation assessment report (PXA) and inform the production of the Updated Project Design (UPD) which will detail further work required to fully analyse, report and curate samples recovered. Therefore, we would recommend the following amendment to clearly set out the purpose of post-excavation assessment and reporting: The final geoarchaeological and palaeoenvironmental assessment report will provide a detailed deposit model, which will characterise the sediments present on the site and provide an assessment of the paleoenvironmental record. The report will	Text edited as requested	We would advise the following amendment: *The final geoarchaeological and palaeoenvironmental assessment report will provide a detailed deposit model, which will characterise the sediments present on the site and provide an assessment of the paleoenvironmental record* **and include preliminary scientific dating**. *The report will include all aspects of the fieldwork associated with geoarchaeological and*

		include all aspects of the fieldwork associated with geoarchaeological and palaeoenvironmental investigation. This will inform the production of the Updated Project Design for full analysis and publication, which will include costings and timescales to complete this work.		*palaeoenvironmental investigation. This will inform the production of the Updated Project Design for full analysis and publication, which will include costings and timescales to complete this work.* Scientific dating will be required to inform on the significance of deposits.
Monitoring During Construction				
Archaeological Monitoring and Recording				
10.179	5.3.131 *"The following general approach will apply for Archaeological Monitoring and Recording during pre-commencement and main works stages."*	For clarity: The following general approach will apply for Continuous Archaeological Monitoring and Recording during pre-commencement and main works stages on very small construction impacts where no other mitigation methodology is practicable.	Text edited as requested	No further comment

10.18	5.3.132 *"Sites that require monitoring during construction activities and investigation will be those that are identified in DWSIs but may also include new areas that arise as a result of emerging results, detailed design and unexpected discoveries."*	This methodology will not be employed on a site wide basis, as it is only suitable for very small construction impacts, where no other mitigation methodology can be implemented (i.e. monitoring of GI investigations). It is inappropriate to implement this methodology to mitigate unexpected discoveries during the construction process. Therefore, we recommend the following amendment to clarify the purpose of Continuous Archaeological Monitoring and Recording: The location of pre-commencement and construction activities that require continuous archaeological monitoring and recording during construction activities and investigation will be identified in DWSIs.	Text edited as requested	No further comment
10.181	5.3.133 *"Sites designated for Archaeological Monitoring and Recording will be stripped with mechanical plant as set out in the DWSIs. The Main Works Contractor(s)' preferred method of working will be subject to archaeological supervision and control. Topsoil, subsoil or other overburden that does not contain datasets relevant to the research objectives will be stripped by a mechanical*	Continuous Archaeological monitoring and recording is only applied to construction activities, therefore this paragraph should be removed.	The Applicant wishes to retain this paragraph as all it does is lay out continuous monitoring and recording will apply good archaeological practice.	For clarity, Continuous Archaeological monitoring and recording is only applied to construction activities where no other mitigation measure is practicable, this is made clear in 5.3.131. Therefore, no further comment on this paragraph.

	excavator fitted with a toothless bucket to the correct archaeological horizon, under the supervision of the Archaeological Contractor(s). The relevant horizon will be informed by the evaluation results, the Research Framework and the research aims and objectives identified in the DWSIs. The sequencing of stripping, together with other relevant logistical considerations will be set out in the DWSI."			
10.182	5.3.134 *"Following stripping, if archaeological remains are identified they will be surveyed using electronic survey-grade equipment to create a detailed digital pre-excavation plan. In accordance with the aims and objectives that will be identified in each DWSI, a strategy based on this plan will be implemented for hand excavation of key features to recover artefactual and scientific dating evidence. At the same time selected feature complexes would be subject to further hand*	Continuous Archaeological monitoring and recording is only applied to construction activities, therefore this paragraph should be removed.	The Applicant wishes to retain this paragraph as all it does is lay out continuous monitoring and recording will apply good archaeological practice.	For clarity, Continuous Archaeological monitoring and recording is only applied to construction activities where no other mitigation measure is practicable, this is made clear in 5.3.131. Therefore, no further comment on this paragraph

	excavation designed to resolve stratigraphic relationships."			
10.183	5.3.135 *"The Main Works Contractor(s) will allow opportunity for the investigation of the archaeological remains. National Grid and the ACoW in consultation with the relevant Local Planning Authority Archaeological Advisors and if appropriate, Historic England, will determine the scope of work and timetable for the completion of the investigation at each site. Vehicles and other plant will not be permitted to track over areas that contain remains until archaeological investigations are complete, or until the ACoW has given permission."*	This is unclear, as it sets out a methodology more suited to Strip, Map and Sample Excavation (detailed above). Continuous archaeological monitoring and recording is applied to small construction activities where no other form of mitigation can be undertaken. A suitably qualified archaeologist will monitor the construction groundworks and will need to be able to hand excavate and record archaeology encountered during groundworks. To facilitate this, plant will be stopped in the area of investigation. Where significant archaeological remains are identified works in the area will cease, and a meeting arranged between the relevant LPAAA, ACoW and National Grid, and where appropriate Historic England to determine an appropriate methodology, which may involve the implementation of targeted Detailed Excavation methodology to appropriately mitigate the impacts of the development	Text edited as requested	No further comment

		upon archaeology. We therefore recommend the following amendment: The Main Works Contractor(s) will allow sufficient time and access for the investigation of the archaeological remains identified during the monitoring process. Should significant archaeological remains be identified during monitoring, groundworks in that area will stop and a methodology will be agreed to appropriately mitigate the impacts of the development. This will be agreed with the relevant LPAAA, in consultation with the National Grid, ACoW and where appropriate Historic England. This may include reversion of the methodology to Detailed Excavation of defined and targeted areas. Vehicles and other plant will not be permitted to track over areas that contain remains until archaeological investigations are complete, or until the ACoW has given permission.		

10.184	5.3.137 *"Modification of the works specification may be required during the investigations to enable detailed recording to take place, and to allow adequate time within the construction programme in the event of important discoveries. In this situation a revised DWSI will be prepared by the Archaeological Contractor(s) in consultation with National Grid, the ACoW , the relevant Local Planning Authority Archaeological Advisors and if appropriate, Historic England, prior to works commencing in the area to which the DWSI applies. Written notice will be provided by the Archaeological Contractor(s) to the Main Works Contractor(s) to give clearance for construction works to (re)commence in the area."*	The DWSIs will be approved, and any revisions will require significant delays to the programme as they will need to be resubmitted through the LPA for approval. Therefore, we would recommend a different approach which allows greater flexibility and reduces delays to the construction programme. We recommend the following amendment and approach: There will be provision within the DWSIs methodology for continuous archaeological monitoring and recording methodology to allow for the modification of work specification should significant archaeological remains be identified during the monitoring process. In this event, a Contractor's Method Statement will be produced, in line with the DWSI and AMS-OWSI Detailed Excavation Methodology detailing the extent of archaeological works to be undertaken. This will be approved by the relevant LPAAA in consultation with National Grid, ACoW and where appropriate Historic England. Written notice will be provided by the LPAAA to the ACoW, to give clearance for construction works to (re)commence in the defined area once archaeological mitigation has been completed. A mechanism for authorising continued construction, under	Text edited as requested	No further comment

		archaeological supervision, beyond the defined mitigation area will be detailed within the DWSIs.		

10.185	5.3.138 *"In the event of an unexpected discovery requiring further investigation (that is, a significant find that was not predicted as a result of the evaluation), the provisions set out above will apply. A site consultation meeting will be held which will consider the specific nature of any unexpected archaeological remains and the potential impacts of any construction activity on the unexpected archaeological remains. The outcomes of this meeting will inform any further archaeological work and the extent of any stand-off that may be required. The area will be fenced off, cleaned archaeologically and recording works completed, in line with a revised DWSI prepared by National Grid and the ACoW in consultation with the relevant Local Planning Authority Archaeological Advisors and if appropriate, Historic England. This document, as secured through Requirement 5 of the*	This is not appropriate for areas where archaeological evaluation has been undertaken. In areas where evaluation has been undertaken, archaeological mitigation would either be by Detailed Excavation or Strip, Map and Sample Excavation. Continuous Archaeological Monitoring and Recording is only appropriate for small construction impacts where other forms of archaeological mitigation cannot be applied (e.g. monitoring of GI investigations). **Please remove this section from archaeological monitoring and recording** as it is not appropriate. This should be included in the Unexpected Archaeology Section, as mitigation methodology will be dependent upon what archaeology has been identified and the significance of the archaeology.	Text edited as requested	For clarity we would advise the following amendment: "*In the event of an unexpected discovery***, during construction**, *requiring further investigation (that is, a significant find that was not predicted as a result of the evaluation),* **the archaeological excavation methodologies outline in Intrusive Archaeological Fieldwork (above**) *will apply. A site consultation meeting will be held which will consider the specific nature of any unexpected archaeological remains and the potential impacts of any construction activity on the unexpected archaeological remains. The outcomes of this meeting will inform any further archaeological work and the extent of any stand-off that may be required. The area will be fenced off, cleaned archaeologically and recording works completed, in line with a revised DWSI prepared by National Grid and the ACoW in consultation with the relevant Local Planning Authority*

	Draft DCO (document reference 3.1), requires that any unexpected finds must be retained in situ and reported to the relevant Local Planning Authority as soon as reasonably practicable. No construction can take place in the location of the unexpected finds until a suitable approach is agreed with the Local Planning Authority and executed, as appropriate."			*Archaeological Advisors and if appropriate, Historic England."*
6. Reporting and Publication				
10.186	6.1.1 *"Following the completion of the fieldwork, all finds and samples would be processed (cleaned and marked). Each category of find or environmental/industrial material would be examined by a suitably qualified specialist so that the results can be included in the Post-Excavation*	For clarity we would advise the following amendment: All finds and samples will be processed, cleaned and marked within appropriate timescales, following removal from the excavation site. It is expected that a programme of finds processing will be undertaken simultaneously with the excavations to ensure appropriate curation	Text edited as requested	No further comment

	Assessment Report produced at the end of the investigations."	of the archaeological evidence. Following completion of the fieldwork, each category of find or environmental/industrial material would be examined by a suitably qualified specialist so that the results can be included in the Post-Excavation Assessment Report produced at the end of the investigations and inform the production of the Updated Project Design.		
6.2 Interim Statements				
10.187	6.2.1 *"Interim statements would be prepared and submitted to National Grid within six weeks of completing fieldwork at each site. The purpose of each interim statement is to provide a basic account of the results of the investigations at each site to inform the progress meetings. The interim statement would include:* · *A summary of the results* · *A draft or sketch plan of each archaeological area or site* · *A quantification of the primary archive including finds and samples* · *Identification of any issues that have arisen to ensure that*	Interim statements would be prepared and submitted to National Grid and the relevant LPAAA within six weeks of completing fieldwork at each site. The purpose of each interim statement is to provide a basic account of the results of the investigations at each site to inform the progress meetings. The interim statement would include: · A summary of the results · A plan of each archaeological area or site showing features, interventions and sample locations. · Provisional dating of features. · A quantification of the primary archive including finds and samples · Identification of any issues that have arisen to ensure that there is integration across the Project between sites and phases · An initial programme of work and	Text edited as requested	No further comment

	there is integration · *across the Project between sites and phases* · *A programme of work and schedule for the completion of the Post-Excavation Assessment Report."*	schedule for the completion of the Post-Excavation Assessment Report. **NB** Full analysis and proposals for publication and archive deposition will be detailed within the Updated Project Design (UPD) following completion of the Post Excavation Assessment Report.		
6.3 Post-Excavation Assessment Report				
10.188	6.3.1 *"The Archaeological Contractor(s) would meet the set time frames in order that the post- excavation assessment, analysis, and publication phases can be programmed and resourced properly, and so that the completion date for all construction and post excavation works can be met."*	This seems more of a contractual obligation rather than something that should be defined within the AMS-OWSI and doesn't secure a timeframe for completion and delivery of the Post-Excavation Assessment Reports and Updated Project Design. The AMS-OWSI should define a timeframe for delivery. We would recommend a more suitable statement: The Post-Excavation Assessment (PXAs) reports will be completed within six months of the completion of the archaeological mitigation for the relevant development phase, detailed within the relevant DWSI. The	Text edited as requested	No further comment

		Updated Project Design (UPD) will be completed within one year of the completion of development. The UPD will provide details of timescales and costs for delivery of the archaeological project and detail full publication and archive deposition.		
10.189	6.3.2 "The results from several fieldwork interventions may be combined as one site for the purposes of the post-excavation assessment and analysis stages or the results for the entire Project assessed in a single Post Excavation Assessment Report. The results from earlier investigations (evaluation surveys and excavations) would also be assessed/reviewed by the Archaeological Contractor(s) where they contribute to an understanding of the site and address the research framework and aims and objectives of the DWSI(s). Following the completion of the post-excavation assessment,	This paragraph is unclear and does not represent the post-excavation process that would be required to fully mitigate the development. We would recommend the following paragraph which clearly defines the purpose of the PXA and UPD: Where practical, results from multiple sites may be presented together in a single Post excavation Assessment Report (PXA) document, but each site must be assessed on its own merits and recorded separately within that PXA. The PXAs will: · **Set out** the assessment and analysis of fieldwork results. · **Identify** revised research questions and priorities derived from the Regional Research Frameworks. · **Inform** the production of an Updated Project Design (UPD). The Updated Project	Text edited	The amended text is acceptable. No further comment

	the original Project objectives would be reviewed to determine the scope of any analysis and publication that may be appropriate.”	Design (UPD) will: · **Consolidate** findings from the PXAs across the project and define a programme of further analysis and specialist study. · **Detail** the required work, including further analysis, scientific dating and specialist reporting. · **Provide** a clear delivery timetable and costed programme for completion of the post-excavation work, including publication of results and archive deposition (including provision to add the vast amount of information to each of the relevant county Historic Environment Records). · **Secure** archive deposition with the relevant LPAAA’s archaeological archive repository and digital archiving with the Archaeological Data Service (ADS). The PXAs and UPD will be approved by the LPAAAs.		

10.19	6.3.3 *"The preparation of the Project archive, post-excavation assessment and subsequent analysis and publication phases would be undertaken in accordance with the DWSI(s), Historic England guidelines (Historic England, 2016a), and CIfA guidelines (CIfA 2014b; 2020; 2023a-f) and other relevant archaeological standards and national guidelines. The different phases would be completed within a set time frame following completion of fieldwork, as agreed between the Archaeological Contractor(s) and the National Grid in consultation with relevant Local Planning Authority Archaeological Advisors and, if relevant, Historic England.*	The Detailed Written Scheme of Investigation (DWSI) cannot set out the exact scope or level of post-excavation analysis because it is approved before fieldwork commences and cannot predict the character or quantity of material recovered. The AMS-OWSI must therefore set out a mechanism to secure a programme of post-excavation reporting to inform the production of an Updated Project Design (UPD). The DWSI will set out the scope of initial assessment to facilitate the production of a Post-Excavation Assessment Report (PXA). However, the UPD is the appropriate document to define and secure the full post-excavation analysis, publication phases as well as preparation and deposition of the project archive. The statement "The different phases would be completed within a set time frame following completion of fieldwork, as agreed between the Archaeological Contractor(s) and the National Grid" reads more as a contractual obligation between National Grid and their chosen archaeological contractor(s). This is not suitable for the AMS-OWSI to secure a timeframe for completion of the assessment reporting phase. We therefore recommend the following amendment: Post-excavation Assessment reports and the	Text edited	No further comment

		Updated Project Design will be prepared in accordance with all relevant national and local guidance, including but not limited to: Historic England guidelines Historic England, 2016a, MoRPHE 2015, and CIfA guidelines CIfA 2014b; 2020; 2023a-f, and with reference to the approved AMS-OWSI and approved DWSIs. Timescales for production of the Post-excavation Assessment Reports (PXA)s and Updated Project Design (UPD) will be decided in consultation with the relevant LPAAA, National Grid, the Archaeological Contractor(s). It is expected that delivery of the PXAs and UPD to the relevant LPAAAs for approval will occur within a period not exceeding one year post completion of project construction. **NB** SCCAS provide local guidance on the preparation of archives for deposition in the County Archaeology Store.		
10.191	6.3.4 "The precise format of the reports is dependent upon the findings of the investigations, but the Post-Excavation Assessment Report would contain the following:"	This section needs to reference MoRPHE 2015	Text edited	No further comment

10.192	6.3.5 *"The Post-Excavation Assessment Report would be submitted to National Grid for review and comment. National Grid would issue the revised draft report to relevant Local Planning Authority Archaeological Advisors and Historic England for comment. In finalising the report, the Archaeological Contractor(s) would take account of these comments."*	This paragraph needs to recognise that the LPAAAs will need to approve each of these documents to fulfil the requirements of the DCO. Therefore, we recommend: The Post-Excavation Assessment Report would be submitted to National Grid for review and comment. National Grid would issue the revised draft report to relevant Local Planning Authority Archaeological Advisors and Historic England for comment and approval. In finalising the report, the Archaeological Contractor(s) would take account of these comments.	Text edited as requested	No further comment
10.193	6.3.7 *"In accordance with the principles of Management of Research Projects in the Historic Environment) (Historic England, 2006) and the Management of Archaeological Projects, 2nd Ed (Historic England, 1991), a staged programme of post-excavation assessment and reporting would be carried out, to commence on completion of archaeological mitigation fieldwork. The terminology used in relation to this is 'Project design' (PD) and 'updated Project design' (UPD). The PD*	All of the referenced guidance documents in this paragraph have been superseded. The relevant documents is MoRPHE (2015) https://historicengland.org.uk/images-books/publications/morphe-project-managers-guide/heag024-morphe-managers-guide/ Therefore, the paragraph needs amending to reflect current national guidance: In accordance with the principles of Management of Research Projects in the Historic Environment (Historic England, 2015), a staged programme of post-excavation assessment and reporting would be carried out, to commence on completion of archaeological mitigation fieldwork of each archaeological mitigation site. This	Text edited as requested	No further comment

	and UPD would be developed in consultation with key stakeholders and agreed by the relevant Local Planning Authority Archaeological Advisors."	would inform the production of an Updated Project Design (UPD). The UPD would be developed in consultation with key stakeholders and agreed by the relevant Local Planning Authority Archaeological Advisors.		
10.194		Given the project's duration, a significant interval may elapse, therefore, we strongly recommend commissioning an up-to-date Historic Environment Record (HER) data request at the Post-Excavation Assessment stage so that any records added in the interim can be incorporated into the assessment reports.	Text edited	SCCAS welcome this inclusion.
6.4 Conservation and Assessment				
10.195	6.4.1 *"Following (or, where suitable, during) fieldwork, the findings would be assessed against the original PD to determine the extent to which the original research aims have been met, and to identify any new research questions to be incorporated in a post-excavation UPD."*	The document currently refers to a Project Design (PD) only in paragraph 6.3.7, creating inconsistency in terminology across the text. The use and role of the PD should be removed as it should refer to the AMS-OWSI and DWSIs which will align this section with the rest of the document to ensure consistent terminology and clear cross-references throughout the document. We would therefore recommend the following amendment:	Text edited as requested	No further comment

		Following (or, where suitable, during) fieldwork, the findings would be assessed against the original AMS-OWSI and DWSIs to determine the extent to which the original research aims have been met, and to identify any new research questions to be incorporated in a post-excavation Updated Project Design (UPD).		
10.196	6.4.2 *"A Post-Excavation Assessment Report would be produced, and this report would form part of the Project archive. It would include a statement of the quantity and perceived quality of the data in the site archive, a statement of the archaeological potential of the data to answer the Project research aims, and recommendations on the analysis and data storage and curation requirements."*	This paragraph needs further clarification; it is anticipated that there will not be a single Post-Excavation Report for the whole project due to its scale and crosses multiple authorities. The post-excavation assessments should commence as soon as fieldwork for a site has been completed. Therefore, we recommend: ~~A~~ Post-Excavation Assessment Reports (PXAs) will be produced, and these reports will form part of the Project archive. The PXAs will include a statement of the quantity and perceived quality of the data in the site archive, a statement of the archaeological potential of the data to answer the Project research aims, and recommendations on the analysis and data storage and curation requirements.	Text edited as requested	No further comment

10.197	6.4.3 *"After processing, including conservation, recording and marking, the finds assemblage from the mitigation must be assessed to give an overview of its potential to meet the research aims of the Project. The recommendations for the extent or depth of further analysis of all, or selected components of, the finds assemblage will be given and justified at this stage and would contribute to the UPD. The assessment would also determine the resource requirements for analysis and identify conservation needs both for analysis and long-term storage and curation. Further analysis should not proceed without the assessment."*	This paragraph needs amending to reflect the scale and nature of the project, we therefore recommend: After processing, including conservation, recording and marking, each finds assemblage type from all mitigation and evaluation phases of work must be assessed to give an overview of their potential to meet the research aims of the archaeological project. The specialists recommendations for further analysis of all, or selected components of, the finds assemblages will be given and justified at this stage and would contribute to the development of an Updated Project Design (UPD). The specialists assessments will also determine the resource requirements for analysis and identify conservation needs both for analysis and long-term storage and curation. Further analysis should not proceed without the specialists assessments.	Text edited as requested	No further comment

10.198	6.4.4 "*Specialist assessment and site narratives would be prepared for inclusion in an UPD. This would be prepared on completion of the specialist assessment, providing a scope for the analysis, reporting and publication of the findings.*"	This paragraph requires further detail: Specialists' assessments and site narratives would be prepared for inclusion in an Updated Project Design (UPD). This would be prepared on completion of the specialist assessment, providing a scope for the full analysis, reporting and publication of the findings, as well as archive deposition (both physical and digital). In addition to reporting, digital vector plans of processed geophysical survey data (greyscale and interpretation plots), trial trenches and mitigation areas, recorded archaeological features and excavated sections, should be provided as georeferenced (EPSG: 27700) ESRI shape or QGIS GPK files. These files should have the relevant attributes attached to them including; HER Parish/Site Code, Primary Reference Number e.g. (Section Number; Context Number; Sample Number; Small Find number; etc); Group or Feature Number; Archaeological Periods and Phases. These GIS files should be provided to the relevant HER following approval of the Post-Excavation Assessment Report(s).	Text edited as requested	No further comment

10.199	6.4	This section needs a paragraph to be added between 6.4.3 and 6.4.4 to cover environmental sampling, we would recommend the following paragraph: Samples taken from each archaeological context will be processed and assessed by the relevant specialists for palaeoenvironmental, industrial and agricultural potential. This must include appropriate scientific dating. The specialist's assessments will also determine the resource requirements for analysis and identify conservation needs both for analysis and long-term storage and curation. Further analysis should not proceed without the specialists' assessments.	Text edited as requested	No further comment
6.5 Analysis and Reporting				
10.2	6.5.1 *"The Project-specific research aims would be addressed in determining the scope for further specialist analysis. This would be carried out in line with the agreed UPD and against measurable programme milestones, to ensure a reasonable and timely programme for the final publication of the results."*	This paragraph requires further detail: The updated Project specific research aims would be addressed in determining the scope for further specialist analysis. This would be carried out in consultation with the relevant LPAAA and line with the approved Updated Project Design (UPD). The UPD will set out measurable programme milestones to ensure a reasonable and timely programme for the final publication of the results and secure archive deposition (both physical and digital).	Text edited as requested	No further comment

10.201	6.5.2 "As a minimum, reports would be produced and deposited with the relevant HER within a reasonable and agreed timescale from completion of fieldwork."	This paragraph requires further details, we would recommend the following: The Updated Project Design (UPD) will define a programme of publication and the number and nature of publications, e.g. journal articles and monographs, appropriate to the significance and extent of archaeology investigated by the project. As a minimum all results will be published as summaries in a regional publication such Proceedings of the Suffolk Institute for Archaeology and History. This will be undertaken within agreed timescales set out within the UPD.	Text edited as requested	No further comment
6.6 Archiving				
10.202	6.6.1 "All reasonable steps would be taken to obtain the agreement of the landowner to the deposition of the full Project archive, and transfer of title to the relevant repository or repositories before mitigation commences."	*This requires further detail:* *All reasonable steps would be taken to obtain the agreement of the landowner to the deposition of the full Project archive, and transfer of title to the relevant repository or repositories before mitigation commences. The Archives must be appropriately maintained and publicly accessible for future research.*	Text edited as requested	No further comment

10.203	6.6.2 “An archiving strategy, including digital archiving would be developed prior to the preparation of any DWSI(s). Each DWSI will outline the specific requirement for use of accession/event number or parish code per site, which will be used as a reference on all material to be archived. Generally the following will apply: · Norfolk - Archives will be deposited with The Norfolk Museums Service. An Event number will be obtained prior to commencement of site works. An accession number will be obtained during reporting phases of works. · Suffolk - Archives will be deposited with Suffolk County Council Archaeological Archive, and in line with SCCAS (2024) guidelines for deposition within Suffolk. A HER Parish Code will be obtained prior to commencement of site works for each parish within which a site falls. An archive deposition form will be completed and	This needs further detail: An archiving strategy, including digital archiving would be developed prior to the preparation of any DWSI(s) and be further developed in the Updated Project Design (UPD). Each DWSI will outline the specific requirement for use of accession/event number or parish code per site, which will be used as a reference on all material to be archived. The following will apply: · Norfolk - Archives will be deposited with The Norfolk Museums Service. An Event number will be obtained prior to commencement of site works. An accession number will be obtained during reporting phases of works. · Suffolk - Archives will be deposited with Suffolk County Council Archaeological Archive, and in line with SCCAS (2024) guidelines for deposition within Suffolk. A HER Parish Code will be obtained prior to commencement of site works for each parish within which a site falls. An archive deposition form will be completed and submitted to the SCCAS Archive Team · Essex and Colchester – Archives will be deposited with Essex Museums Service or Colchester and Ipswich Museum Service (as	Text edited as requested	No further comment

	submitted to the SCCAS Archive Team · Essex and Colchester – Archives will be deposited with Essex Museums Service or Colchester and Ipswich Museum Service (as appropriate). A unique site code will be agreed with the Local Planning Authority Archaeological Advisor prior to commencement of site works for each site. An accession number will be obtained in conjunction with the site code for deposition. It will need to be determined whether a single combined deposition location for the archives is practicable. This will be ascertained on a site-specific basis as required. If an agreement cannot be reached between the districts within Essex, individual deposition requirements will be determined per district."	appropriate). A unique site code will be agreed with the Local Planning Authority Archaeological Advisor prior to commencement of site works for each site. An accession number will be obtained in conjunction with the site code for deposition. It will need to be determined whether a single combined deposition location for the archives is practicable. This will be ascertained on a site-specific basis as required. If an agreement cannot be reached between the districts within Essex, individual deposition requirements will be determined per district.		

10.204	6.6.3 "*The relevant repository or repositories would be consulted before the archive is prepared regarding the specific requirements for the archive deposition and curation, and regarding any specific cost implications of deposition, including the long-term storage of material requiring special conditions, such as relative humidity and temperature.*"	This needs further detail for clarity: The relevant repository or repositories would be consulted before the archive is prepared regarding the specific requirements for the archive deposition and curation, and regarding any specific cost implications of deposition, including the long-term storage of material requiring special conditions, such as relative humidity and temperature. This will typically occur at the Post-Excavation Assessment and Updated Project Design Stage.	Text edited as requested	No further comment
10.205	6.6.4 "*If no relevant repository or repositories are identified, the Project would ensure the storage of the archive until an appropriate repository is available.*"	This needs further details: If no relevant repository or repositories are identified, the Project would ensure the storage of the archive until an appropriate repository is available. All repositories will need to be approved by the relevant LPAAA.	Text edited as requested	No further comment

10.206	6.6.5 "*In addition to the deposition of Project reports and archive with the relevant Local Planning Authority Archaeological Advisors, an electronic record of the Project details would be created through OASIS. The Project record would include technical details for each technique used in the Project. Subject to any contractual requirements on confidentiality, copies of the OASIS record would be integrated into the relevant local and national records and published through the Archaeology Data Service.*"	Following the completion of the project, all reports will need to be published and made publicly available as the data has been generated through the planning process. We would therefore removal of the reference to confidentiality and would recommend the following wording: In addition to the deposition of Project reports and archive with the relevant Local Planning Authority Archaeological Advisors, an electronic record of the Project details would be created through OASIS. The Project record would include technical details for each technique used in the Project. Copies of the OASIS record would be integrated into the relevant local and national records and published through the Archaeology Data Service.	Text edited as requested	No further comment
6.7 Digital Data				

10.207	6.7.1 "*A strategy for digital data would be developed setting out the requirements for the management and preservation of digital data created during the course of the Project. Digital data and digital finds information will be archived to national standards and would be transferred at the end of the Project to a suitable facility or collections repository where it can be properly accessed, curated and maintained (such as Archaeology Data Service University of York), or other cloud based service).*"	Currently ADS are the only digital repository that meet national standards. Suffolk specifically require deposition of the Digital Archive with ADS, for inclusion on the ADS Suffolk Landing Page. Further details are required to set out the provision of a digital management plan. We would recommend the following: A strategy for digital data would be developed setting out the requirements for the management and preservation of digital data created during the course of the Project. This would require the production of a Digital Management Plan, which will be included within the DWSIs. The Digital Management Plan will be updated during the Post-Excavation Assessment and full requirements for digital archiving will be included in the Updated Project Design (UPD). All relevant digital data generated by the project will be archived to national standards and would be transferred at the end of the Project to a suitable facility or collections repository where it can be properly accessed, curated and maintained (such as Archaeology Data Service (University of York)).	Text edited as requested	No further comment
6.8 Publication and Outreach				

10.208	6.8.1 "*The Project is likely to provide scope for additional and more complex reporting, through for example a periodical or regional journal, stand-alone 'monograph' publication and/or popular publication. In addition, popular publications that include, for example, reconstruction drawings and non-technical summaries could be provided to make the results of the on-site mitigation recording more publicly accessible. A programme and strategy for the publication, and public dissemination of the results of the archaeological programme of works would be provided in the UPD.*"	The project scale will provide scope for more complex reporting, therefore we recommend the following amendment: The Project will provide scope for additional and more complex reporting, through for example a periodical or regional journal, stand-alone 'monograph' publication and/or popular publication. In addition, popular publications that include, for example, reconstruction drawings and non-technical summaries could be provided to make the results of the on-site mitigation recording more publicly accessible. A programme and strategy for the publication, and public dissemination of the results of the archaeological programme of works would be provided in the UPD.	Text edited as requested	No further comment

10.209	6.8.2 “Opportunities should be considered and undertaken as appropriate to disseminate the results in the community, for example a public talk about the results of the excavations to take place locally. Other ideas for public benefit should also be explored.”	In previous projects of equivalent scale and complexity, the delivery of public outreach has been coordinated by a dedicated Archaeological Outreach Officer. This individual has either been part of the principal archaeological contractor’s staff or been directly employed by the developers. This requires further details, we would advise the following amendment: Opportunities should be considered and undertaken as appropriate to disseminate the results publicly, this should be coordinated by a dedicated Archaeological Outreach Officer and detailed within the DWSIs for example public talks to take place locally during the excavation phase of the project, the use of social media to disseminate information, engagement with national archaeological programmes TV, Radio and Magazines. If the results present significant information a public facing conference at the end of the project. Other ideas for public benefit should also be explored and detailed in the DWSIs and Updated Project Design (UPD). NB Suffolk have a heritage explorer and Blog posts should be provided with updates as the project progresses.	Text edited	No further comment

10.21	Bibliography	A lot of the referenced documents are out of date and have been superseded. Please ensure you are referencing the up-to-date guidance and documents.	Text edited as requested	SCCAS guidance has been updated 2026
	Appendix B archaeological mitigation areas			SCCAS are not happy with the inclusion of appendix B Archaeological Mitigation areas, and will need to discuss this with the applicant. Where full reporting and agreement with the LPAAA has not be achieved, reference to archaeological mitigation proposals cannot be included in the OAMS-OWSI. Where these conditions are met, mitigation areas can only be included as DWSIs as appendices in order to provide sufficient detail to deliver the archaeological mitigation. Appendix B is not a complete list of mitigation areas for the project as full evaluation of the project impacts has not been completed. This is misleading as it implies the full extent of archaeological mitigation has been determined for the project. However, as the

				evaluation has not been completed for large proportions of the scheme full mitigation cannot yet be determined. The areas included have not been agreed with the LPAAA, in a thematic meeting held 06/05/2026 SCCAS asked for a meeting with the applicant to discuss mitigation within the Suffolk Priority Areas. However, this has not happened.
Essex	**Essex**	**Essex**	**Essex**	
Historic Environment	6.23.2	The Outline AMS/WSI are not currently adequate in relation to archaeology and geoarchaeology and requires amendments. Further detail is required in the Outline WSI as it forms the foundation of later strategies. It is therefore important for it to be clear how this work will proceed, and what is expected of the contracting unit(s) responsible for investigation. It has been agreed, with the Applicant's archaeological representatives that detailed comments will be provided separately in combination with other County Officers in order to come to agreement on the content of the Outline AMS/WSI.	The Applicant believes the respondent is referring to the comments from other stakeholders contained in this document	

Historic Environment	6.23.3	The document states that "Appropriate and proportionate geophysical (magnetometer) survey and archaeological trial trenching has been undertaken to date (Section 1.3.4). The levels of evaluation proposed prior to submission were agreed between the Applicant and relevant parties during the pre-application stage. However, the evaluation, including geophysics and trial trenching, was not completed prior to submission and as a result, full reporting of these investigations has not been completed. This is less than ideal. Normally this would not be considered sufficient information to submit with an application.	The AMS has been updated to include information submitted as SEI in January and will continue to be updated with data from ongoing fieldwork until its submission at Deadline 5.	
Historic Environment	6.23.4	The report proposes that post-consent archaeological evaluation would be limited (**PW - para 1.3.4?**) in extent and to certain locations. ECC considers this position needs to be re-considered in light of the current stage of the evaluation fieldwork as it would normally be anticipated that all areas where impact to the archaeological or geoarchaeological resource is expected, would be evaluated through intrusive archaeological methods (archaeological trenching).	Text edited	

Historic Environment	6.23.5	The document also requires clarity on the scope and extent of further evaluation needed prior to any agreed mitigation. ECC contends that evaluation will be required in all areas of potential impact where topsoil is to be removed, including (but not limited to) undergrounding, pylon bases, haul roads, ecological mitigation measures and drainage measures. This evaluation would include further geophysical survey, archaeological trial trenching and geoarchaeological investigation. Furthermore, the Outline WSI could be supported with the addition of a figure illustrating the areas that remain to be evaluated. This will allow all parties to be clear about the scope and level of evaluation that may be required should consent be given.	Two figures have been produced in support of the AMS: Figure 1: Archaeological Mitigation Strategy (AMS).pdf Figure 2: Location of Archaeological Mitigation Areas Within Priority Trial Trenching Area	
Historic Environment	6.23.6	ECC considers the Outline AMS and WSI do not fully incorporate all potential methodologies and strategies for the post consent mitigation of the archaeological and geoarchaeological resource. While the main mitigation methods proposed are agreed in principle, including preservation in situ, excavation and strip, map and sample excavation and it is agreed that avoidance of significant archaeological remains would be the preferred approach to mitigation, it would not be acceptable to rely on archaeological monitoring and recording **(Section 5.3.131- 5.3.138**) as a mitigation	Text edited	

		method during construction unless undertaken on areas that have been previously evaluated and the extent/significance of potential archaeology has been adequately understood.		
Historic Environment	6.23.7	With regard to preservation of sites through burial, it is considered Section 5.3.6 to 5.3.11 may need updating in light of current research into the most suitable methods and materials. As a result, ECC feels the most up to date methods and practices for burial or sealing of remains will need to be agreed in discussion with the Historic England Regional Scientific Advisor.	This section of the AMS has been updated in light of Historic England's latest guidance	
Historic Environment	6.23.8	The sections covering geoarchaeological evaluation and mitigation lack detail in their methodologies and outputs and need further detail to be included as well as consideration of other geoarchaeological assessment techniques that may be more appropriate.	This section of the AMS has been updated, however, site specific methodologies for the geoarchaeological evaluation will be detailed within the relevant DWSIs.	
Historic Environment	6.23.9	In this regard, Geoarchaeological deposit modelling is listed as an assessment technique however a methodology for this is not provided. Section 5.3.22 refers to archaeological site investigations where geoarchaeology may be recorded and inspected. There is also reference to historic borehole records being consulted. ECC	This section of the AMS has been updated, however, site specific methodologies for the geoarchaeological evaluation will detailed within the relevant DWSIs.	

		considers this does not provide a robust strategy for the collection of geoarchaeological data to inform a deposit model. More details on sources and methodologies for the updating or creation of a deposit model should therefore be included.		
Historic Environment	6.23.10	ECC would also request that if there is potential for further monitoring of ground Investigation (GI) works across the scheme this should also be included as an assessment method and details of the proposed methodology provided. Any further GI works would need to be monitored under geoarchaeological control to enable recording and incorporation into the deposit model and included as a commitment in the Outline WSI as a mitigation method.	This section of the AMS has been updated, however, site specific methodologies for the geoarchaeological works will detailed within the relevant DWSIs.	
Historic Environment	6.23.12	Dependant on the depth, nature and extent of the geoarchaeological deposits to be investigated (which should be derived from a deposit model) there may be other more suitable geoarchaeological techniques which could better address the aims and objectives of the mitigation.	This section of the AMS has been updated, however, site specific methodologies for the geoarchaeological evaluation will detailed within the relevant DWSIs.	
Historic Environment	6.23.13	Geoarchaeological test pits and trenches should be included as potential geoarchaeological methodologies for mitigation in areas where the lateral extent and sampling methodologies would benefit	This section of the AMS has been updated, however, site specific methodologies for the geoarchaeological evaluation will detailed within the relevant	

		from open excavations rather than borehole cores.	DWSIs.	

Historic Environment	6.23.14	Section 6.1.1 makes reference to the processing of finds however no further details are provided. A section on finds processing and processes for the treatment and conservation of metal finds should be included within the Outline WSI. Finds would need to be examined by a suitable qualified specialist so that the results can be included in the evaluation reports. This information would be required for the identification of mitigation areas.	**This has not been addressed in the shared AMS (08/05/2026, 17:16).** **The following has been added to the version on SharePoint:** 6.1.2 A conservation strategy will be developed. All finds will be assessed in order to recover information that will contribute to an understanding of their deterioration and hence preservation potential, as well as identifying potential for further investigation. Furthermore, all finds will be stabilised and packaged in accordance with the requirements of the receiving museum. As a guiding principle, only artefacts of a "displayable" quality would warrant full conservation, but metalwork and coinage from stratified contexts would be expected to be x-rayed if necessary, and conservation costs should also be included as a contingency. 6.1.3 Upon completion of fieldwork all finds will be cleaned, identified, marked (if appropriate) and properly packed and stored in	

			accordance with the requirements of national guidelines. Metalwork will be x-rayed and assessed by a conservator. Any samples taken shall be processed appropriately. All artefacts must be assessed by a qualified and experienced specialist. Assessment should be generally based on MORPHE (Historic England 2015b) but should include: * Preparation of a descriptive catalogue * Dating (where possible) * An assessment of the significance of the assemblage * An assessment of the potential for further analysis to contribute to the interpretation of the archaeology of the site * An assessment of the potential for further analysis to contribute to artefact studies * Recommendations for additional artefact illustration/photography * An assessment of the condition of the assemblage and recommendations for conservation, retention/discard	

			and archiving.	

Historic Environment	6.23.15	The proposals for reporting and provision of updated information need further consideration. The full reporting of the previous, current and forthcoming evaluations is considered a priority as this will be the basis for the selection of sites for mitigation. The reporting of trial trench evaluations should be included as a separate section within the outline WSI as the information required to make a balanced decision on mitigation will differ from a site that has been chosen for mitigation.	Text edited	
Historic Environment	6.23.16	Agreement on the content of the Post-excavation Assessment Report (6.3) needs to be discussed in conjunction with both Norfolk and Suffolk archaeological advisors to ensure the requirements do not clash across county boundaries. It would be preferable to only include Essex sites within each post ex report and not a combination across the counties unless the sites cover a landscape that crosses county boundaries such as the Stour Valley.	Text edited	
Historic Environment	6.23.17	It is considered there would be scope to demonstrate a commitment to delivering enhanced public understanding/benefit and legacy as part of the mitigation (section 6.8) considering the significant size of the scheme and the interest in the heritage of the area. There is more opportunity for publication and outreach which should be expanded on in the Outline WSI.	The case for outreach has been strengthened in the document and this is encapsulated in para 6.8.2	

Historic England	Historic England	Historic England	Historic England	
4.1		1.3.4 states that appropriate and proportionate geophysical (magnetometer) survey and archaeological trial trenching has been undertaken to date, but we do not feel that this statement is correct. It was stated in the Chapter 11 of the main Environmental Statement that part of the geophysical survey work has not been completed (10% of the Phase 1 Priority areas and 50% of the Phase 2 areas), and that the Trial Trench evaluation excavations are also outstanding (85% of the Priority areas and 100% of the Phase 2 areas).	Table 1.1 has been updated with the latest completion rates	
4.2		In addition, the Geophysics and Trial Trench evaluation reports included in Appendices 11.4 and 11.5 respectively are stated to be interim reports only. They do not represent the full assessment of the results, and they do not include the specialist assessment of things like the artefacts or samples. Referring to these documents as 'the results of the evaluation fieldwork' for example (Section 1.8.1) is misleading.	This comment relates to the Chapter Appendices and not the AMS.	
4.3		The result of the geophysical survey and Trial Trench evaluation excavation are needed to understand the potential of the proposed development area as well as the potential impact of the different elements of the scheme. A significant amount of information	The AMS has been updated to include information submitted as SEI in January and will continue you to be updated with data from ongoing fieldwork until its submission at	

		is therefore not available for review to support the application.	deadline 5.	
4.4		It is stated in Section 1.3.4 that only **limited** additional archaeological evaluation will be carried out post-consent, but as stated above, the majority of the Phase 1 and all of the Phase 2 evaluation work has either not been completed or not started at the point of submission.	The AMS has been updated to include information submitted as SEI in January and will continue you to be updated with data from ongoing fieldwork until its submission at deadline 5.	
4.5		It is stated that the OAMS-OWSI describes the mitigation that could be undertaken. Due to the lack of evaluation data available for review, this document will need to allow for a degree of flexibility post-consent to ensure that opportunities to investigate features and deposits are not missed, and will need to be updated regularly.	The AMS has been updated to include information submitted as SEI in January and will continue you to be updated with data from ongoing fieldwork until its submission at deadline 5.	
4.6		Table 2.1 outlines the aims of the mitigation techniques proposed for the project. In general, the approaches summarised in this table are what we would expect to see. However, we would recommend that mitigation approach 1.2 (discussed further in Sections 5.3.6-5.3.11), which proposes the burial or sealing of remains within barrier membrane' is reviewed. The Historic England document 'Preserving Archaeological Remains' (2016), and in particular, Appendix 5, 'The Reburial of Archaeological Sites'	This section of the AMS has been updated in light of Historic England's latest guidance	

		(2024) should be referred to, to help define a reburial scheme for the archaeological site: https://historicengland.org.uk/imagesbooks/publications/preserving-archaeological-remains/		
4.7		The 'Reburial of Archaeological Sites' document states that the use of geosynthetic membranes needs to be justified. It is further stated that they are not usually required and can at times cause damage to the assets that they are installed to protect. We would therefore recommend that the potential use of geosynthetics as a barrier membrane is reconsidered and justified.	This section of the AMS has been updated in light of Historic England's latest guidance	
4.8		The 'Reburial of Archaeological Sites' document helps to define a reburial scheme for an archaeological site that considers the significance of the remains, its condition and an assessment of the impacts and risks facing the site. We would recommend that this document is referred to and the 'Reburial Checklist' and 'Reburial Threats and Risks' documents are completed. This would ensure that the reburial strategy is appropriate for the site and for the remains in question.	This section of the AMS has been updated in light of Historic England's latest guidance	

4.9		5.1.1 states that the DWSI's will be approved by the relevant Local Planning Authority, and if relevant, Historic England. We would recommend that the DWSI's are shared with Historic England, particularly the Science Advisor who can review aspects such as the sampling strategies.	Text edited	
4.1		5.1.12 and 5.3.138 state that no construction will take place on site if unexpected remains are discovered until a suitable approach has been agreed with the Local Planning Authority and Historic England. It should be noted that if waterlogged structures, remains and deposits are discovered, the size of the stand-down area required will need to be considered as the construction work could result in the dewatering of adjacent areas. This could impact the archaeology and result in its degradation and loss.	Text edited	
4.13		5.3.40 states that all evaluation necessary for the purposes of the ES was completed, but we do not agree with this statement. The Geophysics reports in Appendix 11.4 and the Trial Trench evaluation reports presented in Appendix 11.5 are interim reports only and significant portions of the evaluation work is still outstanding. Specialist assessment of the artefacts and environmental samples has not been carried out/ completed and so the potential, condition and significance cannot be confidently determined at this stage.	The AMS has been updated to include information submitted as SEI in January and will continue you to be updated with data from ongoing fieldwork until its submission at Deadline 5.	

4.15		5.3.51 states that if waterlogged deposits are identified, the Conservation specialist and the Environmental Archaeology Coordinator or Environmental Archaeology Supervisor will be contacted for advice, which is good to see. In addition, advice will be sought from the Historic England Science Advisor and relevant Local Planning Authority, which is also good to see.	Noted	
4.16		5.3.69 and 5.3.72 state that hearths and areas of burning will be completed excavated and sampled for techniques such as archaeomagnetic dating. We would recommend that it is made clear that an archaeomagnetic dating specialist will need to assess the potential of a feature for dating before it is excavated, as this technique requires samples to be recovered from areas of in situ burning.	Text edited	
4.17		It should be noted that some of the features and remains will require a specific sampling strategy to be developed (e.g. structures, industrial features etc). The strategies will need to be included in the DWSIs.	Text edited	
4.18		5.3.84 states that the environmental sampling strategy for each DWSI will be based upon the results of previous assessment work, but with the exception of the EACN evaluation excavations, environmental samples have not been assessed yet.	The AMS has been updated to include information submitted as SEI in January and will continue to be updated with data from ongoing fieldwork until its submission at Deadline 5.	

4.2		5.3.88 outlines the sort of remains that will be assessed as part of the investigations. Details of the types of samples that will be recovered will need to be included in the subsequent DWSI, include the size of the samples required to produce statistically reliable assessments.	Following edit made: The aims of the environmental strategy will be to address the Research Framework. *Details of the types of samples that will be recovered are to be included in the appropriate DWSIs and will include the size of the samples required to produce statistically reliable assessments.* Site based studies that could aid the investigations will include the following (this list is not exhaustive, and other studies may be relevant):	
4.23		It is stated that scientific dating will be undertaken at the post-excavation stage (Section 5.3.92) but it should be noted that for some techniques, samples will need to be recovered during the fieldwork phase (e.g. archaeomagnetic dating. OSL etc.).	Text edited	

Suffolk County Council

NORWICH TO TILBURY

EN020027

APPENDIX 2 OAMS-OWSI Figures

Answers to Examining Authority Questions Round 2

Suffolk County Council [redacted]

1 Deadline 5 review of the OAMS-OWSI

1.1 SCCAS comments on figures 1 and 2 submitted with the draft OAMS-OWSI for review with the LPAAAs.

1.2 SCCAS strongly recommend a meeting to discuss issues arising from these comments.

Figure 2

General comments

1.3 Figure 2 is misleading. Despite being titled "Figure 2 - Location of Archaeological Mitigation Areas Within Priority Trial Trenching Areas", it includes the entirety of the scheme including vast areas which are yet to have archaeological evaluation completed and reported (geophysical survey and trail trenching). ALL these areas should be shaded as areas of “mitigation not defined” to provide appropriate clarity for ExA.

1.4 Figure 2 must include numbered trench locations.

Mitigation Areas comments

1.5 The areas of proposed mitigation which have been included in Figure 2 have not been discussed with the LPAAA and for the majority of sites there are no full evaluation reports. Given the lack of information available (in terms of reporting of evaluation) SCCAS do not support the inclusion of mitigation areas within the OWSI in Figure 2 or Appendix B.

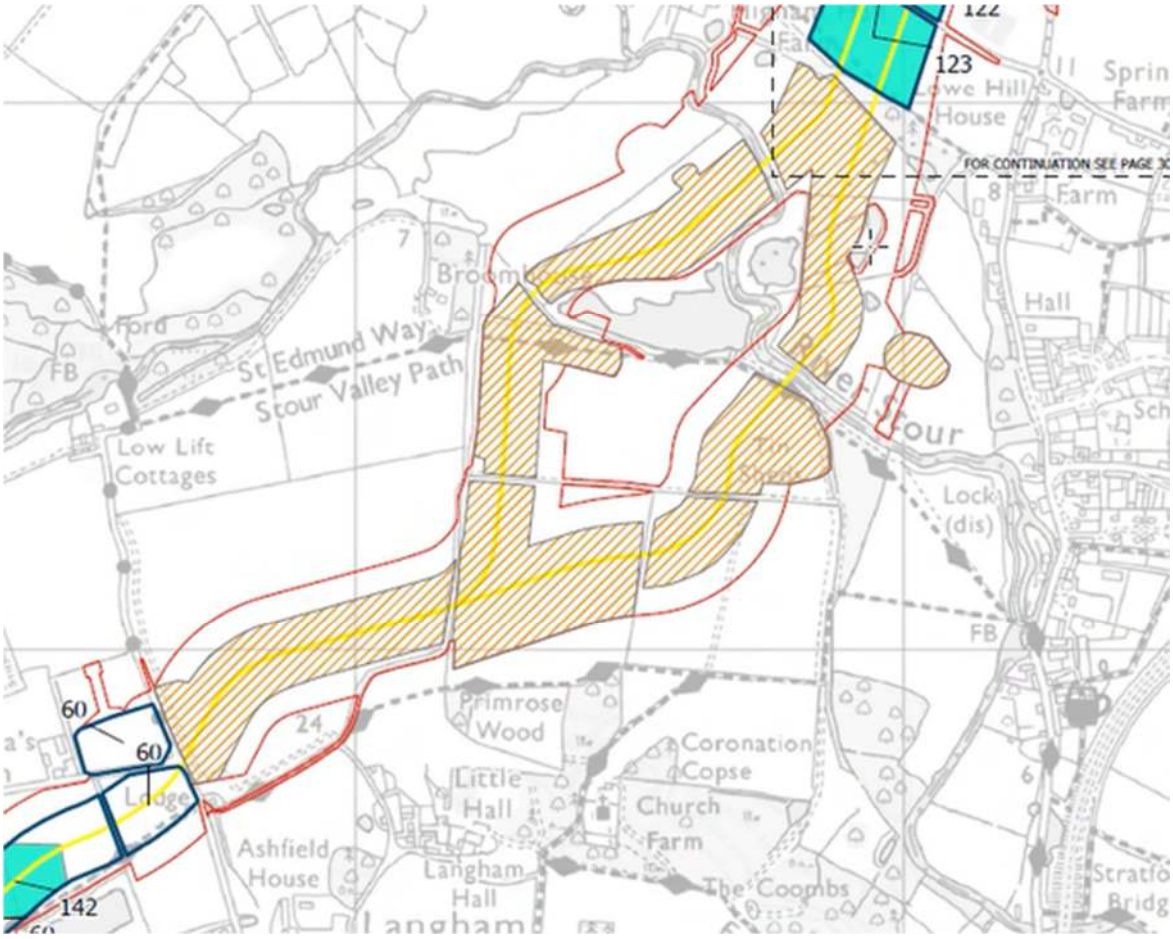
1.6 Identification of the location and extent of mitigation requires full evaluation reports and detailed discussions with the LPAAAs as the information and analysis in those reports, such as dating of features, will influence the extent and type of mitigation appropriate. Without this information and discussions, it is impossible to make reliable decisions on mitigation. SCCAS did ask the applicant in a thematic archaeology meeting 06/05/2026 to have a meeting to discuss limited areas of mitigation where full reports exist, however this meeting has not yet happened.

1.7 Although the applicant states they will supply DWSIs covering these areas of mitigation for approval, with the inclusion of mitigation areas in the OWSI (DCO submission) there is no legal mechanism to secure the quality of the DWSIs as they are not secured under DCO requirement wording. Therefore, any areas of mitigation included in the OWSI for the DCO, must be included as DWSIs (as appendices to the OAMS-OWSI). The OWSI does not provide sufficient detail to secure appropriate mechanisms for excavation and recording of archaeological mitigation areas.

1.8 Where full evaluation reports are available and discussions with the relevant LPAAAs have agreed mitigation areas, these could be included in a figure similar to figure 2, however, it should be clearly identified as "indicative" to facilitate any changes in engineering design that may occur and SCCAS reiterate that all other areas must be clearly defined as "mitigation yet to be defined", and any areas must have accompanying DWSIs (approved by the LPAAAs). This provides clarity to the ExA that the areas identified do not comprise the entirety of mitigation for this project.

1.9 From the archaeology thematic meeting held on 06/05/2025, SCCAS are aware that there are concerns about the ability of National Grid to undertake archaeological works during pre-commencement and that this may have implications for project programme. However, this can be solved by including pre-commencement works and period in the DCO Requirement 5 wording. This would allow for DWSIs to be submitted for approval during that period and the subsequent archaeological works to be undertaken during this period (under approved DWSIs).

Stour Valley



1.10 The Stour is part of the priority trenching but has not been outlined as priority trenching. This should be outlined in dark Blue to indicate this is also part of the priority trenching area.

Figure 1

1.11 SCCAS welcome the inclusion of Figure 1, but it requires edits before it can be accepted.

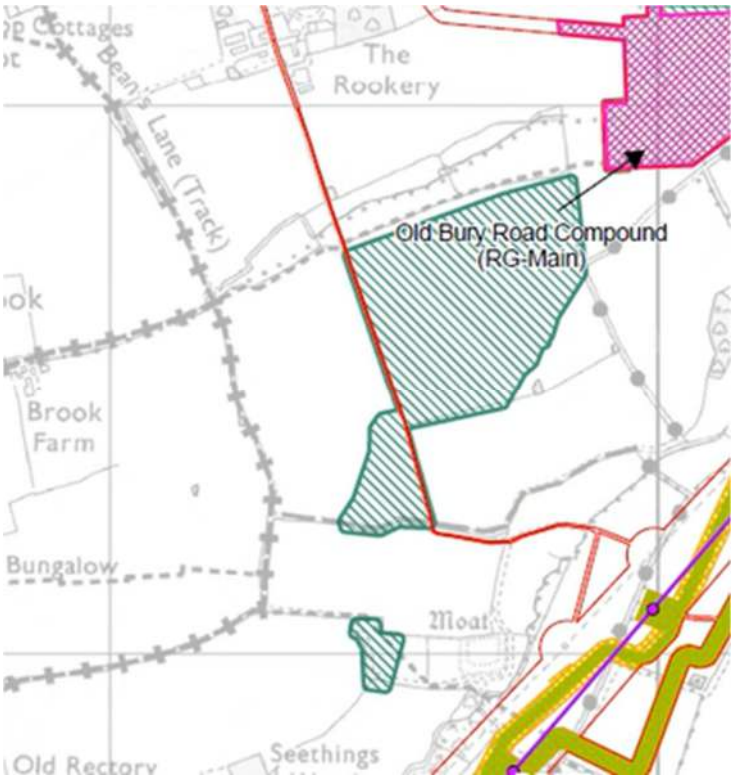
1.12 Figure 1 should show the locations of the trial trenches undertaken within the Phase 1 priority areas.

1.13 The current key is confusing. It states that Phase 1 priority geophysical survey and trial trenching have been "completed." While the fieldwork has largely been carried out for the priority areas, full reporting is not available for all areas. SCCAS recommend relabelling these areas in the key as "fieldwork completed" to avoid implying that the evaluation is fully complete, an area should only be described as "completed" once full reporting has been provided.

1.14 Comparison with Document 8.2.1 Drainage Strategy Appendix B shows that multiple construction impacts (including SuDS ponds and proposed overhead-line pulling locations etc.) are not covered by the Phase 2 trenching as currently defined. This must be corrected for the plan to be acceptable.

1.15 The OAMS-OWSI currently defines Phase 2 evaluation too narrowly, which risks preventing necessary design variations after approval. SCCAS recommends that the full red line order limit be identified as the **Phase 2 evaluation area**, with a clarification in the key that the evaluation will be **focused on project impacts**. The specific areas to be evaluated for Phase 2 should then be defined in the DWSI(s) for Phase 2.

1.16 Finally, Figure 1 (page 12) includes areas outside the project order limits. It is unclear what development impacts these areas relate to. Please clarify whether these areas are intended for ecological enhancements, biodiversity net gain or other purposes.


Cottages
Bean's Lane (Track)
The
Rookery
Old Bury Road Compound
(RG-Main)
Brook
Farm
Bungalow
Moat
Old Rectory
Seethings