

# NORWICH TO TILBURY

EN020027

## Comments on Submissions received at Deadline 4

Suffolk County Council [REDACTED]

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## Glossary of Acronyms

<i>AMS-OWSI</i>	<i>Archaeological Mitigation Strategy and Outline Written Scheme of Investigation</i>
<i>BNG</i>	<i>Biodiversity Net Gain</i>
<i>CoCP</i>	<i>Code of Construction Practice</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>DWSI</i>	<i>Detailed Written Scheme of Investigation</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>HDD</i>	<i>Horizontal Directional Drilling</i>
<i>HEMP</i>	<i>Historic Environment Management Plan</i>
<i>HER</i>	<i>Historic Environment Record</i>
<i>LEWG</i>	<i>Landscape and Ecology Working Group</i>
<i>LIR</i>	<i>Local Impact Report</i>
<i>LPA</i>	<i>Local Planning Authority</i>

<i>LPAAA</i>	<i>Local Planning Authority Archaeological Advisors</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>RSCF</i>	<i>Regional Skills Coordination Function</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SEP</i>	<i>Skills and Employment Plan</i>
<i>UU</i>	<i>Unilateral Undertaking</i>

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

## **Purpose of this Submission**

The document has been prepared by Suffolk County Council to respond to the Applicant’s submissions, and where appropriate representations made by other interested parties, received at Deadline 4 (“**D4**”) for Norwich to Tilbury. Examination Library references are used throughout to assist readers.

## Comments on submissions received at Deadline 4

<b>Table 1:</b> 2.16 (B) Trees and Hedgerows to be Removed and or Managed Plans – Section B [REP4-030] and Section C [REP4-031]			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC’s Comments</b>
1.1	Landscape and Visual	<b>General</b>	<p>The plans do not identify by reference to the numbering systems of the Tree Survey or the Hedgerow Regulations Report the trees and hedgerows, which would be useful to assess the impacts/significance of the proposed works, even if it is provided elsewhere, for ease of reference. SCC raised similar concerns (as regards earlier versions of these plans) in the Joint LIR [REP1-178] at paragraphs 13.119, 13.125, and 13.131. It is unreasonable to expect SCC (or the ExA) to try to tie up the information in the Tree Survey in Annex C of the AIA [APP-236], which is not map based, or in the Hedgerow Regulations Assessment [APP-161] with the affected areas shown on these plans. Nor is it reasonable to expect SCC to have to rely on prior local knowledge and/or field survey to assess these impacts. Schedules should also be provided to list the removals so that the overall effects can be understood.</p> <p>The following comments, although detailed, may not capture all of SCC’s concerns with regards to vegetation losses. SCC understands that the current plan reflects the reasonable worst-case scenario. However, SCC considers that now is the time to flag these issues up, as some may require changes to the DCO boundaries.</p>
1.2	Landscape	<b>Section B, Sheet 1</b>	<p>Ling Road, southern side: Why do the outer two of the four trees need to be removed?</p> <p>Millway Lane, southern side: Why does mature oak require removal rather than crown lifting? - Northern side: there appear some trees to have been missed from the survey (field maple) and just shown as hedge.</p> <p>Lion Road, East Cottage: why is the haul road to the east not place further into the field to avoid vegetation loss? This is not acceptable. - Why does the western curtilage vegetation require</p>

			<p>removal? – The groups shown south of Lion Road showing three trees contains at least two other trees. Why are they not identified?</p> <p>A143 Old Bury Road: Is vegetation removal required to extent shown? Tree west of access (southern side) should be retained if possible.</p>
1.3	Landscape	<b>Section B, Sheet 2</b>	<p>Hedge north-west of Valley Farm (A143): this ought to be micro-sited, as current indication is tree removal, which could possibly be avoided.</p> <p>Field entrance, south of Valley Farm (A143): A lot of vegetation has not been recorded here, including two young oak trees, clearly planted as gateway trees to the entrance. It is also not clear, why the tree shown to the west of the entrance needs to be removed (visibility?)</p>
1.4	Landscape	<b>Section B, Sheet 4</b>	<p>South of Little Green, north of Big Wood: Can DCO boundary redrawn to avoid harm to the trees shown as removed/potentially affected? Hedge has not been mapped.</p> <p>It is also considered that the DCO limits should not cross the property at Windeye.</p> <p>It is also unclear, why the DCO limits need to include the tree south of church view.</p> <p>Hedge adjacent to Mellis Road may require coppicing (shown as unaffected); also, DCO boundary seems very tight and close to the hedge.</p>
1.5	Landscape	<b>Section B, Sheet 5</b>	<p>Burgate Road, west of Big Wood: Could the removal of the two young trees be avoided if the DCO boundary was extended further south to the existing hardstanding, west of Burgate Road, and the works areas accessed from there avoiding the trees?</p> <p>West if hardstanding: why are there two trees shown as affected?</p> <p>West of Moatyard Plantation: Two (or possibly three) trees that require removal (only two are mapped) and a stretch of important hedgerow could have been saved here, if the SCC’s change request (subject to Cultural Heritage agreement) would have been taken on board the alignment kept to the east of Burgate Road.</p>

			<p>Green Lane: Every effort should be made to minimise the harm to this historic route; the western access through the vegetation should be removed.</p> <p>Gislingham, est of Coldham Lane and along Thornham Road: There are a number of trees that are shown as to be removed or affected/managed, where it should be considered, whether some could be retained through micro-siting. The hedge shown in blue, appears to be a group of trees and, if so, should be mapped as such.</p>
1.6	Landscape	<b>Section B, Sheet 7</b>	<p>Wickham Road, PRoW to the south: SCC considers that the impacts on this important hedgerow and the hedgerow trees could have been further reduced or avoided had SCC’s change requests for this area been taken on board.</p>
1.7	Landscape	<b>Section B, Sheet 8</b>	<p>Mendlesham Road, southern side: It is not clear why it is necessary to break through the vegetation on the eastern side of the corridor.</p> <p>On the single-track road between Hoggars Rd and Mendlsham – Wicks Farm there are two oaks on the northern side, which are earmarked to be removed, but which are arguably the features most worth of retention along this road. Micro-siting should be considered here.</p>
1.8	Landscape and Visual	<b>Section B, Sheet 9</b>	<p>Elden’s Lane (north of Lambert’s Lane): It appears that a temporary haul road is placed near the hedge, so that the hedge is potentially affected. The trees within the hedgerow are shown as unaffected, which is welcome, but SCC (Landscape) considers that this requires clarification. SCC considers that temporary works should avoid vegetation loss, if possible. It would also be welcome if the oak at the corner (east) could be retained.</p> <p>South-west of Mendlesham Farm, it is not very clear what measures are intended for the hedge in the stripey hatch. Alos it would be welcome, if the two oaks earmarked as potentially affected could be retained (at southern end of PRoW and at the corner of the road to Gipping).</p> <p>At the bottom of Sheet 9 there are 2 hedges (access track to farm) shown as potentially affected. SCC (Landscape) would ask the Applicant to reconsider the DCO boundary to ensure that these hedges will not be affected for the purposes of a temporary haul road.</p>

1.9	Landscape and Visual	<b>Section B, Sheet 10/11</b>	PRoW north- east of Bell’s Lane (A1120): SCC (Landscape) queries whether in light of the significant loss of two veteran trees, four other, potentially mature trees, within an important hedgerow, the DCO boundary could be amended and the alignment changed to avoid these trees. This would be achievable by changing the locations for towers RG152- RG154. With this change another additional five identified trees along Bell’s Lane and on field tree could also be saved.
1.10	Landscape and Visual	<b>Section B, Sheet 12</b>	<p>South-west of Grove Farm it appears that a temporary haul road is requiring the removal of trees and hedgerows. SCC (Landscape) considers that the DCO boundary in this area should be re-considered to avoid this vegetation loss for temporary works. Temporary works should as a principle avoid existing vegetation and keep a safe distance.</p> <p>SCC (Landscape) queries the purpose of the access route shown north of Stowmarket Road (B1113) between Doves Cottages and The Laurels. This highly vegetated track does not appear to be a suitable access.</p>
1.11	Landscape and Visual	<b>Section B, Sheet 14</b>	<p>SCC (Landscape) would welcome, if vegetation loss east of Gibbon’s Farm and Laurel Cottage could be rationalised/ reduced by locating the haul road within the route corridor, where crossing the hedge line.</p> <p>At Hascott Hill SCC (landscape queries why there are so many peripheral trees earmarked for removal, and whether this could be reduced through traffic management.</p>
1.12	Landscape and Visual	<b>Section B, Sheet 15</b>	<p>Could the haul route east of the corridor (between RG178 and RG179) use the exiting field access further east rather than pushing through another group of vegetation?</p> <p>Also, south-west of Lower Wood and east of RG181, could the punch through the hedgerows and associated tree loss be prevented?</p>
1.13	Landscape and Visual	<b>Section B, Sheet 16</b>	SCC (Landscape) is concerned about the access track leading from the B1078 north-west to a cluster of dwelling which are surrounded by mature vegetation. The Plan shows no vegetation to be removed. However, there is concern that firstly, the vegetation here has not been accurately

			<p>mapped, because what is depicted as hedge appears from a Google search to include several mature trees south of the proposed route. Secondly there is concern that vegetation removal will subsequently become necessary. SCC (Landscape) considers that the DCO boundary should be increased into adjacent fields to avoid temporary haul routes to incur unnecessary vegetation losses.</p> <p>SCC (Landscape) considers that the tree works proposed at Ringshall should be carefully considered and reduce where possible. Traffic management options should be considered.</p> <p>At Williams Tye, Tye Lane, Tye Farm, it should be considered to route the proposed access route around the identified group of trees. This would require changing the DCO boundary.</p> <p>On Holly Road, if the small tringle of land was included within the DCO limits, it might be possible to micro-site the underground cable in such a way as to avoid the loss of/ harm to three young oak trees, which in the context provide considerable amenity value.</p>
1.14	Landscape and Visual	<b>Section B, Sheet 17</b>	<p>RG 190, south of Bildeston Road: SCC would ask the Applicant to consider if the tree-lined hedgerow can be removed from the order limits to avoid harm to this landscape feature.</p> <p>Court Farm: SCC would ask the Applicant to consider if the extensive tree loss in the approach to Court Farm could be avoided by allowing sufficient space within the DCO limits to utilise the adjacent field.</p> <p>SCC queries, why the oak north-east of Gunn’s Farm requires removal (nearest tower: RG195).</p>
1.15	Landscape and Visual	<b>Section B, Sheet 18</b>	<p>PI25: SCC queries why it is necessary to remove five, potentially six trees to remove the existing powerline.</p>
1.16	Landscape and Visual	<b>Section B, Sheet 19</b>	<p>South of Tye Lane, there appears to be great loss of vegetation. Not only numerous trees within a hedge line but also the severing of a linear TPO group in two separate areas and incursion into the Ancient Woodland of Bushy Grove. SCC would ask the Applicant to consider how harm can be minimised here and considers that this strengthens the argument that a landscape</p>

			restoration scheme commensurate with the harm inflicted is required around Bramford substation and Burstall.
1.17	Landscape and Visual	<b>Section B, Sheet 20</b>	<p>SCC considers that the Applicant should endeavour to safeguard and protect the important hedgerow and its trees along the western boundary of the substation.</p> <p>East of Bullen Wood it is unclear what the purpose of the DCO Limits is where a corridor extending south crosses a hedgerow and track.</p>
1.18	Landscape and Visual	<b>Section B, Sheet 21</b>	<p>The proposed vegetation loss along Bullen Lane is considerable and SCC (Landscape) would ask the Applicant to demonstrate that this is really required as other comparable projects did not require this. SCC (Landscape) considers that the proposed road widening at the Bullen Lane/B1113 junction would cause significant harm to the existing tree group, which is of high visual amenity value within the public realm. Its importance is amplified by all the changes the local residence experience in this area. To remove the entire group to also facilitate a temporary works compound is wholly unacceptable and SCC urges the Applicant to reconsider the proposals in this area.</p> <p>At Thornbush the vegetation along the proposed track has not been mapped very accurately. SCC queries why the alignment of the undergrounded power cable cannot be placed to avoid the northern end of the existing hedge.</p> <p>Where towers are removed (PLD47-PLD48), harm to existing vegetation is potentially wide ranging. SCC would urge the Applicant to minimise harm and to increase the DCO limits as necessary to avoid landscape feature, in particular for temporary works.</p>
1.19	Landscape and Visual	<b>Section C, Sheet 1</b>	
1.20	Landscape and Visual	<b>Section C, Sheet 2</b>	PHB26: SCC (Landscape) asks the Applicant to demonstrate why it is necessary to remove seven mature trees along Burstall Lane for the removal of the existing power line. SCC asks that the Applicant explores options to retain these trees.

			<p>It is also unclear why the veteran tree further south (which is outside the DCO Limits is shown as potentially affected.</p> <p>At Hurdle Makers Hill (south of JC 14) it is unclear why almost the entire group requires removal rather than management.</p>
1.21	Landscape and Visual	<b>Section C, Sheet 3</b>	<p>Between JC 22 and JC 23, Chattisham Road: SCC would ask the Applicant to explore options to retain the mature tree (oak) towards the southern edge along the alignment corridor for its visual amenity within the public realm.</p>
1.22	Landscape and Visual	<b>Section C, Sheet 4</b>	<p>Proposed access From Wenham Road, west of Rookery Farm: SCC is concerned that this track (in particular, the stretch between the two hedgerows) is not suitable and too close to existing vegetation, which is shown as being unaffected. Similar concerns exist regarding the next proposed access track further west. SCC urges the Applicant to draw the DCO boundaries wide enough to ensure the existing vegetation will not be affected.</p> <p>It is unclear why the DCO limits north-west of JC26 are laid out so that they directly affect two hedgerows, SCC would welcome some clarification on this.</p>
1.23	Landscape and Visual	<b>Section C, Sheet 6</b>	<p>The proposed access track to JC32 appears considerably more vegetated on Google Maps. SCC would ask the Applicant to explain the discrepancy.</p> <p>There is concern that this track is unsuitable, would incur tree removal, and therefore may need to be reconsidered (including changes to DCO limits).</p> <p>SCC would ask the Applicant to explore whether it is necessary to cross the woodland along the Hadleigh Railway Walk twice.</p>
1.24	Landscape and Visual	<b>Section C, Sheet 7/8</b>	<p>SCC considers that Acacia Road is a clear example where the Limits of Deviation need to be tightened in order to avoid losing five mature trees along this road. SCC considers that this loss is unacceptable.</p>

			<p>SCC further queries whether it would be possible to include the B1070 further south to the corner into the DCO and then continue the haul road in the field adjacent west to the one currently proposed and thereby reducing vegetation losses.</p> <p>SCC queries why the mature oak along the B1068 on the eastern periphery of the cable route needs to be removed.</p>
1.25	Landscape and Visual	<b>Section C, Sheet 8</b>	<p>SCC queries the necessity to remove two, potentially three mature trees and a group of trees along the A12.</p> <p>SCC further queries the removal of three tree along Hadleigh Road at the entrance to Holton St Mary.</p>
1.26	Landscape and Visual	<b>Section C, Sheet 9</b>	<p>There appears to be a tree in the cable corridor near Broomhouse, which is likely to require removal, but has not been mapped.</p>

- 1.1 The changes made by the applicant to the draft DCO at Deadline 4 are set out in Table 2.3 of the Applicant’s *Schedule of Changes to the Draft DCO [REP4-042]*.
- 1.2 Since most of the changes are drafting amendments (resulting from the two Change Applications accepted by the ExA) and typographical corrections, SCC has comments in respect of one change only, namely that listed as item 15, which is set out in Table 2 below.
- 1.3 In addition, **Appendix 1** sets out a proposed new requirement which provides for the establishment of a Landscape and Ecology Working Group (“**LEWG**”). The rationale for the establishment of the LEWG is set out in a document prepared by the Suffolk Wildlife Trust which has been shared with SCC, and which is being submitted at Deadline 5. The Suffolk Wildlife Trust endorse the drafting of the proposed requirement.


Table 2: 3.5 (C) Schedule of Changes to the Draft DCO [REP4-042]				
Table Item	dDCO Ref.	Rationale for Change	Change Made	SCC’s Comments
2.1	Schedule 3, requirements (paragraph 4(1))	Updated following a request from National Highways to be a consultee for the management plans to the extent that they relate to the strategic highway network.	4. Construction Management Plan (1) No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority (following consultation with Natural England in the case of the landscape and ecological management plan and, <b>where relevant in the context of the operation of the local and strategic road network</b> , the relevant highway authority <b>in the case of the</b>	A drafting point: as drafted, for the relevant highway authority to be consulted on a management plan, the context would have to be relevant to the operation of the local <u>and</u> strategic road network. SCC considers relevance to either network should trigger consultation and so SCC would suggest that new paragraph 4(1) should be amended as follows –  4. Construction Management Plans (1) No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority (following consultation with Natural England in the case of the

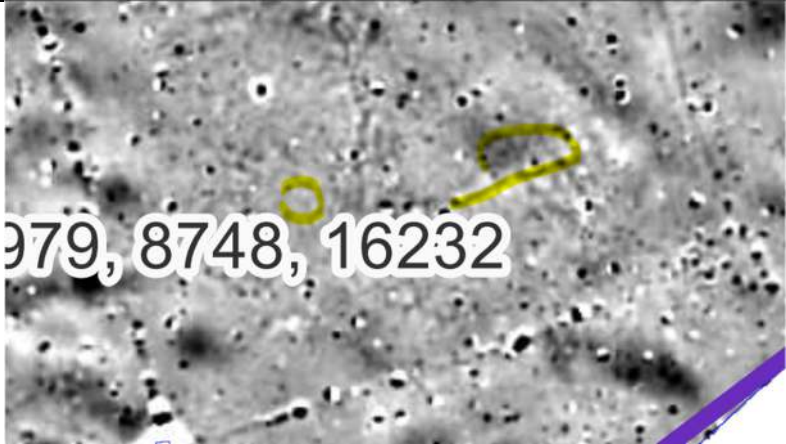
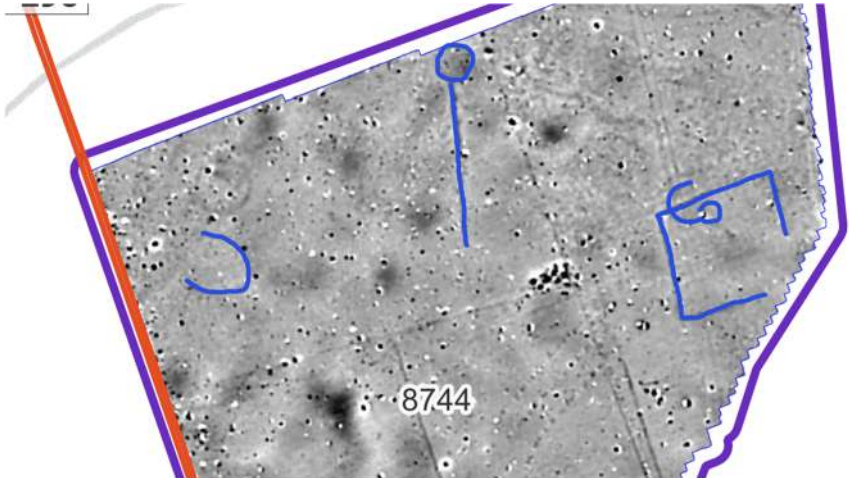
			<b>construction traffic management plan</b> ). The relevant plans are – ...	landscape and ecological management plan and, where relevant in the context of the operation of the local <b>and or</b> strategic road network, the relevant highway authority). The relevant plans are— ...
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Table 3: 6.11.A4 (C) ES Appendix 11.4 Geophysical Survey (Priority Areas) Results Report – Part 1 [REP4-128]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC’s Comments
3.1	Archaeology	<p><b>4.1</b></p> <p>Magnetometer survey is generally recommended over any sedimentary geology. However, the average response/receptivity varies depending on the specific bedrock geology. Over chalk, which is mapped across Section A and Section B, the response is generally good. In Sections B, C, and D, where sand is recorded, the response may be poor but can be variable. <u>Alluvial/colluvial deposits, present within the river valleys across Sections A, B, C, D, F and G, can also cause an average to poor response of the magnetic signal: in these environmental contexts, depending on the thickness of these deposits and on the type of features and/or depth of burial beneath the deposits, it is possible that certain anomalies may be masked.</u></p>	<p>SCCAS welcomes the addition of the amendment to section 4.1. however, SCCAS believe that the Applicant’s response to Essex County Council in [REP3-074] HE1.47 (below) to be a better descriptions of the benefits and limitations of magnetometer survey, and would ask that this is included into the Geophysical Survey Report:</p> <p><i>“Magnetometer survey (as used for the Project) is an extremely useful, rapid, cost effective, non-invasive technique for archaeological prospection that can identify anomalies derived from geological, archaeological, or modern origins. The Chartered Institute for Archaeologists defines geophysical survey as: ‘Archaeological geophysical survey uses non-intrusive and non-destructive techniques to determine the presence or absence of anomalies likely to be caused by archaeological features, structures or deposits, as far as reasonably possible, within a specified area or site on land, in the inter-tidal zone or underwater. Geophysical survey determines the presence of anomalies of archaeological potential through measurement of one or more physical properties of the subsurface’<sup>51</sup>.</i></p> <p><i>As magnetometer survey creates an image of below ground deposits by measuring the magnetic differences between the underlying superficial geological deposits and features cut into those deposits, it is well suited to detecting large features or features with sufficiently magnetic fills to be detected above the natural magnetic variability of the superficial geology. Magnetometry is also suited to identifying deposits altered</i></p>

			<p><i>through heating, organic decay, and containing burnt material ditches, pits, hearths and kilns. The technique does, however, have its limitations and it cannot inform the archaeological significance, function, date, depth, or state of preservation of those anomalies it does identify. Furthermore, the technique is not capable of detecting archaeological features that do not have a magnetic signature sufficiently different to the surrounding superficial geology to be distinguished by the magnetometer.</i></p> <p><i>Magnetometry, therefore, struggles to identify small, ephemeral archaeological features, such as graves which are rapidly backfilled with the same material which was dug out to create the grave, and features of pre-Iron Age date when metallurgy was much more prevalent resulting in magnetically enhanced industrial waste being incorporated into archaeological features.</i></p> <p><i>Due to these shortcomings, the lack of geophysical data has not been treated as negative evidence by the Project, and the absence of anomalies does not prove that archaeological features are absent. For this reason, and in agreement with the archaeological advisors to the Local Planning Authorities, all the geophysically surveyed areas within areas of impact within the Order Limits will be subject to a trial trenching programme that will target geophysical anomalies, cropmarks, old map features, LiDAR anomalies and also 'blank' areas in the geophysical data to test its efficacy. The assessment of the Project's effects on the archaeological resource presented in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] is based on all available sources comprising Historic Environment Record data (e.g. findspots and artefact scatters, cropmarks, results of previous fieldwork), Project mapped cropmarks, Project mapped LiDAR, Project mapped historic map features, a systematic walkover survey undertaken by the Applicant,</i></p>
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			<p><i>and where fieldwork has been undertaken for the Project, the results of geophysical survey and archaeological trial trenching.</i></p> <p><i>The Applicant has, therefore, built up as complete a picture as possible of the archaeological resource within the Order Limits, and on the basis of the accumulated evidence, has been able to infer the potential for the presence of subsurface archaeological remains. In order to assess the impact of the Project on the potential archaeological resource, a realistic worst-case approach has been adopted when assessing the value of the archaeological baseline to ensure that the significance of effect is not underestimated. Both geophysical survey and trial trenching are ongoing but a lot of the evaluation work has been completed and the results have been submitted (6.11.A3 Environmental Statement Appendix 11.3 - EACN Substation Geophysical Survey Report <b>[APP-211]</b>, 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report <b>[APP-212]</b>, 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report - Part 1 <b>[AS-072]</b>, 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report - Part 2 <b>[AS-074]</b>, 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report - Part 3 <b>[AS-076]</b>, and 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report <b>[APP-213 and AS-078]</b>). The results of the ongoing geophysical survey and trial trenching will be made available to the archaeological advisors to the Local Planning Authorities as they become available and the combined results will inform the ongoing production of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b>, which will set out appropriate mitigation for the archaeological remains within the bounds of the Project's Order Limits. The Applicant is, therefore, confident that</i></p>
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			<i>the archaeological resource within and potentially affected by the Project will be fully mitigated either through avoidance or full excavation.”</i>
3.2	Archaeology	<p><b>Section B</b> 11699, 17484 610151, 277756</p> <p>“No anomalies of clear archaeological potential have been identified. One former field boundary, and a former pond have been identified, as well as a few faint linear trends of agricultural origin (Illus 288)”</p>	<p>There is a weakly positive and intermittent concentric curvilinear anomaly of possible archaeological origin that has not been incorporated into the interpretation:</p> 
3.3	Archaeology	<p><b>Section B</b> 11979, 8748, 16232 610091, 277062</p> <p>No anomalies of clear archaeological potential have been identified in this Priority Area. Several linear/rectilinear anomalies in the east may locate former field systems pre-dating historic mapping (Illus 293). Four former field boundaries have been recorded as well as several land drains in the west of the Priority Area (Illus 293). Anomalies</p>	<p>There is a weakly positive curvilinear anomaly of possible archaeological origin that has not been incorporated into the interpretation. The uncertain anomaly appears to be more extensive than the interpretation indicates:</p>

		<p>reflecting variation in the geological background have also been identified, comprising faint, linear trends in the centre of the Priority Area, and much broader, curving anomalies throughout (Illus 293). Large, magnetically enhanced anomalies identified in the south-west possibly locate an intermixed band of Alluvium, Head, and Croxton Sand and Gravel Member, recorded underlying this Priority Area.</p>	
<p>3.4</p>	<p>Archaeology</p>	<p><b>Section B</b> 8744 609642, 276665</p> <p>A possible ring ditch approximately 32m in diameter has been recorded as a low magnitude anomaly in the north-west corner of 8744 (Illus 296). Three sides of a possible rectilinear enclosure 65m in length has been mapped in the eastern part of the Priority Area (Illus 296). Two, parallel, faint ditch-like anomalies possibly cross the enclosure. No HER assets are recorded in the vicinity, and no anomalies of note are recorded in the southern Priority Area. The remaining anomalies are agricultural and/or natural in origin identifying former boundaries and/or field drains.</p>	<p>There are several weakly positive anomalies that could be of archaeological origin that have not been incorporated into the interpretation, and the rectilinear anomaly of probable archaeological origin appears to include anomalies interpreted as agricultural in origin:</p> 

<b>Table 4:</b> 6.11.A4 (C) ES Appendix 11.4 Geophysical Survey (Priority Areas) Results Report – Part 2 [REP4-130]			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC’s Comments</b>
4.1	Archaeology	<b>General Approach</b>	A number of anomalies within the Suffolk sections may be of archaeological origin. These are visible on the processed greyscale images but have not been incorporated into the interpretation. SCCAS will provide further information to the applicant.

<b>Table 5:</b> 6.11.A4 (C) ES Appendix 11.4 Geophysical Survey (Priority Areas) Results Report - Part 3 [REP4-132]			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC's Comments</b>
5.1	Archaeology	<b>General Approach</b>	SCCAS are aware that the vast majority of the undergrounding priority area have been subject to trial trenching, the applicant should include an assessment of the geophysical survey results against the results of the trial trenching in the priority areas within the full evaluation reports.

<b>Table 6:</b> 7.2 (D) Outline Code of Construction Practice [REP4-165]			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC’s Comments</b>
6.1	Health & Wellbeing	<p><b>NV23</b></p> <p><i>For the construction of pylon foundations, non-percussive piling methods will be used, <u>except where the results of ground investigations reveal that percussive piling is unavoidably required. A schedule of locations where percussive piling is unavoidably required will be prepared following the completion of ground investigations and shared with the Local Planning Authorities prior to piling operations commencing.</u></i></p> <p>(Reiterated in [REP4-171] Para 4.3.8)</p>	<p>Alongside the provision of a schedule identifying locations where percussive drilling is unavoidably required. SCC requests that the Applicant provides a location specific assessment of potential health and wellbeing impacts (including where relevant, air quality, noise and vibration effects) together with details of proposed mitigation and management measures for SCC’s consideration prior to commencement of those activities. The outline CoCP should be updated to secure this commitment.</p>
6.2	Water Environment	<p><b>Table 5.1</b></p> <p>Anticipated licences, assents, consents and permits</p>	<p>SCC (LLFA) considers that Table 5.1 should include the section 23 of the Land Drainage Act 1991, and that a note should be added to say that all temporary culverts shall be removed and watercourse reinstated back their original status.</p>
6.3	Landscape and Visual	<p><b>Table 6.1</b></p> <p>Mitigation measures / environmental commitments (LV01 – LV10)</p>	<p>Please refer to comments made in the Joint LIR [REP1-178].</p>

<b>Table 7: 8.2 (B) Drainage Strategy DCO [REP4-187]</b>			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC's Comments</b>
7.1	Water Environment	<b>Appendix A</b> Table A.1	SCC (LLFA) notes that not all drainage areas have a viable strategy for water disposal.
7.2	Water Environment	<b>General Approach</b>	SCC (LLFA) states that the minimum infiltration rate is 10mm/hr, and that any drainage pipes under the public highway will require a licence from SCC Highways.  Appendix C Illustrative Drainage Typical Details is missing.
7.3	Archaeology	<b>General Approach</b>	While the Drainage Strategy Appendix B is not required to address archaeological impacts directly, it identifies locations where drainage infrastructure, temporary and permanent construction works, and potential changes to surface-water movement may occur. These elements have the potential to affect buried archaeological remains through ground disturbance and/or changes to preservation conditions. The OAMS-OWSI should therefore take account of the drainage and construction-related works identified in this document, to ensure that all areas of ground disturbance are subject to archaeological evaluation (geophysical survey and trial trenching) and mitigation where required.

<b>Table 8: 8.4.3 (B) Report on Interrelationship with Other Infrastructure Projects [REP4-297]</b>			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC’s Comments</b>
8.1	Landscape	<b>Table 6.1</b> DCO2 Bramford to Twinstead	<p>SCC (Landscape) considers that the interaction of Norwich to Tilbury with mitigation areas of other projects, in particular, but not exclusively, with Bramford to Twinstead, at Bramford substation, needs to be agreed with the relevant local authority and that an equally suitable, alternative area will need to be provided for the approved Mixed Broadleaved Native Woodland planting in document 7.8.2 (b): LEMP Appendix B – Vegetation Reinstatement Plans submitted during the Bramford to Twinstead examination.</p> <p>Changes to approved mitigation for other projects, such as Five Estuaries and North Falls Offshore Wind Farms, Bramford Green Limited, East Anglia Three Offshore Windfarm, Pathfinder Clean Energy UK DEv Ltd, Clearstone Energy, and Bramford Power Ltd also should be agreed with the relevant local authority.</p>

<b>Table 9:</b> 8.4.9 (A) Applicant’s Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC’s Comments</b>
9.1	Archaeology	<p><b>2.5</b></p> <p><b>Table 6.1 (GG08)</b></p> <p>The Applicant acknowledges the council’s comments and, as stated in the Applicant’s response to questions HE 1.45 and HE 1.46 in 8.9.1 Applicant's Responses to First Written Questions [REP3-074], an updated Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) will be submitted to the ExA at Deadline 5 – after having been shared with stakeholders for review, including Suffolk County Council, other Local Planning Authority Archaeological Advisors and Historic England – with the intention of securing agreement to avoid delays in the discharge of Requirements. The Applicant has already set out in meetings (and in the examination responses) that a revised version will be provided for stakeholder review by Deadline 4 and will be agreed with the</p>	<p>The CoCP is not an appropriate mechanism to secure preservation in situ because it does not provide for post-construction, operational or decommissioning phases. National Grid must therefore reference the production of an Historic Environment Management Plan as part of the OAMS-OWSI to detail how preservation in situ of heritage assets will be achieved.</p> <p>It is necessary that an Historic Environment Management Plan is produced in addition to the OAMS-OWSI to accommodate the discovery of heritage assets during the evaluation and construction phases which are chosen to be preserved in situ.</p> <p>As a minimum, the Historic Environment Management Plan should set out that National Grid will record the location of heritage assets which have been preserved in situ, and that any National Grid works required in these preservation in situ areas will elicit a programme of archaeological mitigation where heritage assets are impacted.</p>

		<p>Local Planning Authority Archaeological Advisors and Historic England to ensure a timely, deliverable programme for evaluation and mitigation.</p> <p>It is not the Applicant’s intention to produce a Historic Environment Management Plan (HEMP) separate from the AMS-OWSI. Measures for the protection and preservation of archaeological and heritage assets during construction are contained within 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], 7.2 Outline Code of Construction Practice [Revision D] and Requirement 5 (Archaeology) of 3.1 Draft Development Consent Order [Revision D]. Beyond the construction phase and the completion of archaeological excavation and recording there are no ongoing impacts to archaeological remains and no heritage assets that will remain within the land retained by the Applicant. Therefore the Applicant will not produce a standalone Historic Environment Management Plan.</p>	
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9.2	Archaeology	<p><b>2.7</b></p> <p><b>Table 6.1 (GH11)</b></p> <p>The Applicant acknowledges the council’s concern and confirms that the wording of GH11 will be revised for inclusion within a future iteration of 7.2 Outline Code of Construction Plan to make specific reference to sensitive archaeological deposits as a receptor to be considered within the Risk Assessment to be undertaken and to include reference to Historic England as a relevant stakeholder.</p>	<p>Can the applicant confirm that the Hydrological risk assessment for crossing locations will include assessment of hydrology of superficial deposits and impacts on archaeological and palaeoenvironmental remains?</p>
9.3	Archaeology	<p><b>2.8</b></p> <p><b>Table 6.1 (H03)</b></p> <p>The Applicant acknowledges the council’s comments and notes that commitment H03 in 7.2 Outline Code of Construction Practice [Revision D] discusses measures to avoid unintentional damage to known archaeological remains or to areas where archaeological investigations will take place. Also, GG04, GG05 and GG08 detail mitigation measures and environmental commitments which will be put in place for the duration of the works.</p>	<p>Archaeology needs to be part of this to cover areas of trial trenching, areas for archaeological mitigation and any areas which are chosen for preservation in situ.</p> <p>The project delivery partner should be made aware as soon as possible that this would be a necessary element of the Digital Environment Management Plan.</p>

		<p>The Applicant currently envisages that a digital Environment Management Plan would be produced by the Project’s delivery partner, alongside the use of a geographic information system as a compliance tool. This would support the Clerk of Works, for example by clearly identifying constraints and no-go areas such as nesting bird locations, relevant buffers and offsets, and mitigation areas.</p>	
<p>9.4</p>	<p>Archaeology</p>	<p><b>2.9</b> <b>Table 6.1 (H04)</b></p> <p>The Applicant notes the council’s comments on the wording of H04 in 7.2 Outline Code of Construction Practice [Revision D] and the suggested amendments. Having reviewed the suggested amendments against the current wording, it is the Applicant’s position that the suggested amended wording would not alter the actions to be taken in the event of the discovery of previously unknown heritage assets.</p> <p>Therefore the Applicant proposed that the current wording remains. For clarity the current wording of H04 is as follows:</p>	<p>SCCAS have concerns with the proposed wording put forward by the applicant, as H04 is in the OCoCP it needs to explicitly state that this is for the unexpected discovery of archaeological heritage assets during construction activities, and link H04 to the OAMS-OWSI which will detail how the archaeology would be mitigated.</p> <p>SCCAS would advise the following amendments to add clarity to H04:</p> <p><i>“Where, <b>during construction activities</b>, 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 Historic England and agree <b>an appropriate</b> solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements. <b>This will be secured through a DWSI or Preservation In Situ Management Plan, in line with the approved OAMS-OWSI.</b> The Main Works Contractor(s) will be 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”.</i></p>

		<p>‘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 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. The Main Works Contractor(s) will be 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.’</p>	<p>This adds clarity to the commitment within the OCoCP by making clear that it relates to the discovery of unexpected archaeology by construction workers during the construction phase. It also signposts that the procedures to be followed in the event of previously unknown archaeological heritage assets being discovered are set out in the OAMS-OWSI.</p>
9.5	Archaeology	<p><b>2.11</b> <b>Table 6.1 (W06)</b></p> <p>The Applicant acknowledges the council’s comment on the need to tailor horizontal directional drilling (HDD) crossings to protect archaeologically and palaeoenvironmentally sensitive deposits, including river valleys, and notes that this has been addressed in our ongoing process. Our response on pages 355 – 356 of 8.8.2 Applicant’s Comments on Local</p>	<p>The OAMS-OWSI must reflect the potential for alternative crossing methods to be employed, if HDD is considered unviable following further geological assessment.</p> <p>“<i>reported sequence of natural layers with no archaeological deposits</i>” does not appear to reflect the findings set out in <b>6.11.A6 Environmental Statement Appendix 11.6 Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]</b> the report records the presence of peats and organic silts of currently unknown date. This report also notes these deposits are likely to have high palaeoenvironmental and archaeological significance, and further archaeological assessment of these deposits will be required (post-consent) to determine the level of</p>

		<p>Impact Reports [REP2-030] sets out that the approach to safeguarding archaeology is governed by 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] under Requirement 5, with geoarchaeological and palaeoenvironmental investigations incorporated where necessary. The geoarchaeological monitoring of Ground Investigation works for the Stour Valley (6.11.A6 Environmental Statement Appendix 11.6 Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]) reported sequence of natural layers with no archaeological deposits. Further work is provided for within 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and will be updated in consultation with Local Planning Authority Archaeological Advisers, as already confirmed above.</p>	<p>significance and appropriate mitigation dependent upon final designs for the crossings.</p>
9.6	Archaeology	<p><b>2.12</b>  <b>Table 6.1 (W12)</b>                  A substantial programme of archaeological evaluation (geophysical survey and trial trenching) has been</p>	<p>SCCAS acknowledges the archaeological works undertaken to date, however, this do not cover the whole of the scheme. In particular, trial trenching does not extend to elements outside the priority areas. This includes features such as drainage ponds and outfalls, which, based on the information provided to us, are not currently proposed for trial trench evaluation as part of Phase 2 trenching.</p>

		<p>undertaken and remains ongoing, and construction features such a drainage ponds and outfalls are within the Order Limits and as such have been considered and incorporated into survey areas which have already been completed and those yet to be undertaken.</p> <p>To the end of December 2025, approximately 3,000 trial trenches and 1,650 hectares of geophysical survey had been completed; the results to that date were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information (SEI) [AS068 to AS-083], and Suffolk County Council has been made aware of this information. The vast majority of the priority geophysical survey and trial trenching areas are complete and are included within the SEI. The approach taken is proportionate to the importance and likely significance of the assets and exceeds the level of field evaluation often completed for comparable nationally significant infrastructure projects. Where further uncertainty remains, the Applicant has a clear and agreed programme for further</p>	<p>Revision of the OAMS-OWSI is necessary to ensure that <b>all construction impacts</b> are evaluated and, where appropriate, mitigated post-consent. This must be secured through robust and enforceable requirement wording and an approved OAMS-OWSI.</p> <p>There is currently no agreed programme for further/post-consent work and mitigation, as the OAMS-OWSI still requires significant amendment.</p> <p>SCCAS also note that, in Suffolk, the majority of trial trenching reports submitted to date are interim reports rather than full archaeological reports, and that SCCAS has not been consulted on, or involved in, any discussions with the applicant regarding the mitigation programme for the priority areas.</p>
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		work and mitigation. Phase 2 evaluation is underway in 2026 and all subsequent results will be shared with the Local Planning Authority Archaeological Advisors for review, in accordance With 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].	
9.7	Archaeology	<p><b>3.3</b></p> <p><b>1.2.2</b></p> <p>The council’s concern is noted. It is proposed to create habitats within the Environmental Areas within the Order Limits and therefore impacts to the historic environment have been considered as part of the Environmental Impact Assessment. It is not proposed to create habitats elsewhere within the Order Limits, habitats that are temporarily removed would be reinstated. The AMS-OWSI outlines the archaeological mitigation proposed for all areas of impact within the Order Limits.</p> <p>There are no proposals for the Applicant to create habitats off site. The Applicant will purchase biodiversity units to deliver a net gain in biodiversity; these will be</p>	<p>SCCAS notes the Applicant’s clarification that habitat creation within the Order Limits, where it forms part of the authorised works or project mitigation and has the potential to affect archaeological remains, would be addressed through the programme of archaeological works defined in the AMS-OWSI and subsequent DWSIs.</p> <p>SCCAS also notes the Applicant’s position that it does not propose to create, enhance or manage off-site habitats, and that biodiversity units would instead be purchased from organisations registered with Natural England. However, where any off-site habitat creation, enhancement or management is relied upon as part of the project’s BNG or environmental mitigation package, SCCAS considers that the archaeological implications of those works should be appropriately assessed and, where necessary, secured. This may be through the DCO archaeological requirements where the relevant land or works are secured by the DCO, or through an equivalent legally enforceable mechanism or obligation where works are delivered outside the Order Limits.</p> <p>Any on-site habitat creation areas within the Order Limits should be clearly identified in the AMS-OWSI and/or relevant DWSIs where they involve</p>

		<p>obtained from organisations that are registered with Natural England to sell units. The Applicant will not be creating/enhancing or managing these habitats.</p> <p>Therefore, the Applicant proposes to make no changes in the project Overview section.</p>	<p>ground disturbance or other works with potential to affect archaeological remains.</p> <p>Any BNG habitat creation should be sensitive to the historic environment.</p>
9.8	Archaeology	<p><b>3.4</b></p> <p><b>1.4</b></p> <p>See response to 3.3 above, the council’s concern is noted but there are no proposals for the Applicant to create habitats off site. The Applicant will purchase biodiversity units to deliver a net gain in biodiversity; these will be obtained from organisations that are registered with Natural England to sell units. The Applicant will not be creating/enhancing or managing these habitats.</p>	See SCCAS response to NG’s response to 3.3
9.9	Archaeology	<p><b>3.5</b></p> <p><b>2.2</b></p> <p>See responses to 3.3 and 3.4 above; the council’s concern is noted, but the only places where habitats are to be created within the Order Limits are within the</p>	See SCCAS response to NG’s response to 3.3

		<p>Environmental Areas. Impacts to the historic environment have been considered as part of the Environmental Impact Assessment. There are no proposals for the Applicant to create habitats off site.</p> <p>The Applicant will purchase biodiversity units to deliver a net gain in biodiversity; these will be obtained from organisations that are registered with Natural England to sell units. The Applicant will not be creating/enhancing or managing these habitats.</p>	
9.10	Archaeology	<p><b>3.6</b></p> <p><b>3.3</b></p> <p>The Applicant currently envisages that a digital Environment Management Plan would be produced by the Project’s delivery partner, alongside the use of GIS as a compliance tool. This would support the Clerk of Works, for example by clearly identifying constraints and no-go areas such as nesting bird locations, relevant buffers and offsets, and mitigation areas.</p>	See SCCAS response to NG’s response to 2.8
9.11	Archaeology	<p><b>3.7</b></p> <p><b>5.3</b></p>	See SCCAS response to NG’s response to 3.3

		<p>See responses to 3.3, 3.4 and 3.5 above; the council’s concern is noted, but the only places where habitats are to be created within the Order Limits are within the Environmental Areas. Impacts to the historic environment have been considered as part of the Environmental Impact Assessment. There are no proposals for the Applicant to create habitats elsewhere within the Order Limits or off-site. The Applicant will purchase biodiversity units to deliver a net gain in biodiversity; these will be obtained from organisations that are registered with Natural England to sell units. The Applicant will not be creating/enhancing or managing these habitats.</p> <p>Habitats that are to be temporarily removed for example to create the haul road will be reinstated in the same location; there would be no need to break ground in areas that have not been excavated by the construction activities.</p>	
9.12	Archaeology	<p><b>3.8</b></p> <p><b>Table 5.4</b></p> <p>The Applicant has addressed Suffolk County Council Archaeology Service’s</p>	<p>This is mitigation for contamination, not mitigation for impacts upon archaeological remains or deposits.</p> <p>GH11 SCCAS agree with the proposed amendment to include assessment of sensitive archaeological deposits.</p>

		<p>concern on page 357 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], noting that clay breakouts and HDD risks are mitigated under GH11 and GH12 in 7.2 Outline Code of Construction Practice [Revision D] and that commitment B26 specifically commits to a trenchless crossing method statement and contingency plan for the River Stour crossing by the Main Works Contractor(s), once detailed design is available.</p> <p>Also, the Applicant agrees that close coordination between all Clerks of Works within the Outline Landscape and Ecological Management Plan [REP3-030] and the Archaeological Clerk of Works is essential to deliver both ecological and archaeological requirements smoothly and without conflict. This will be clarified and formalised in 7.2 Code of Construction Practice [Revision D].</p>	<p>However, GH12 does not reflect the need for a separate methodology to manage drilling clay breakout in areas of archaeological sensitivity. The standard methodology to seal and provide remediation for breakouts would be damaging to archaeological remains which are to be preserved in situ therefore, a separate methodology should be developed for these areas and this should be noted in GH12.</p> <p>SCCAS would recommend an additional bullet point in GH12:</p> <ul style="list-style-type: none"> <li>• <b><u>In areas of archaeological sensitivity, a separate methodology for containment, removal and remediation of drilling clay breakout will be developed, in consultation with the relevant LPAAA, project archaeologists and where necessary Historic England.</u></b></li> </ul> <p>SCCAS welcomes the applicant's commitment to ensure close coordination between all project Clerks of Work to ensure smooth delivery of the project.</p>
9.13	Archaeology	<p><b>3.9</b></p> <p><b>6</b></p> <p>See responses to 3.3, 3.4, 3.5 and 3.7; there are no plans to create habitats in areas that are not already affected by</p>	<p>See SCCAS response to NG's response to 3.3</p>

		<p>construction activities, therefore no new impacts to buried archaeology would arise because of the habitat creation, reinstatement or enhancement.</p> <p>Habitats are to be created in the Environmental Areas on land that would be owned by the Applicant that has been subject to heritage assessment.</p> <p>Replacement planting will be undertaken at locations across the Project, where temporary construction activities would already have broken ground. The replacement planting would be on a like for like basis, i.e. hedgerow, tree, shrub and grassland planting will be undertaken in the areas that were covered by these habitats/plants prior to construction activities taking place. The Environmental Areas are the only locations where new habitats are to be created, but construction activities in the areas will have broken ground or caused disturbance in the areas before the planting takes place.</p>	
9.14	Archaeology	<p><b>3.10</b></p> <p><b>6.1.35</b></p>	<p>The creation of Water Vole exclusion zones typically requires removal of vegetation and burrows 50m either side of the crossing location.</p>

	<p>If it is necessary to displace water vole they are to be displaced into the sections of watercourse that adjoin the impact area. There is no proposal to create new waterbodies or water features for water vole. Cutting back bankside vegetation to encourage water vole to move out of the construction area, and digging back into burrows in areas where culverts are to be located, would not lead to additional impacts over and above what has been assessed for the watercourse crossings.</p> <p>The Applicant acknowledges the council’s point that archaeology should be considered in relation to water vole displacement. Details on this issue have been provided in the Applicant’s response to the council on pages 357 – 358 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p> <p>In summary, the impacts of ecological mitigation on archaeology are addressed in 6.11.A2 Environmental Statement Appendix 11.2 Historic Environment Assessment Tables [AS070]. Any mitigation of these effects will be Delivered in accordance with the governance Framework set out in 7.2</p>	<p>Therefore, there would be the potential for disturbance of the banks to have archaeological implications.</p> <p>There should be appropriate provision within the OAMS-OWSI, SCCAS suggests the following paragraph is added to the OAMS-OWSI:</p> <p><b><u>“Where water vole displacement is required, appropriate archaeological assessment and mitigation will be undertaken.”</u></b></p> <p>For similar projects in areas of high archaeological potential a programme of archaeological monitoring and recording was employed during works for water vole displacement to mitigate impacts upon archaeology.</p>
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		Outline Code of Construction Practice [Revision D] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].	
9.15	Archaeology	<p><b>3.11</b></p> <p><b>7.5.15</b></p> <p>The Applicant acknowledges veteran trees as living monuments potentially connecting them to past human activity and land use, for example lapsed pollard management and their link to bio-cultural heritage. The Applicant has committed to reducing the overall impacts on trees, see commitments GG14 and LV08 of 7.2 Outline Code of Construction Practice [Revision D].</p> <p>The Applicant acknowledges the council’s point that archaeology should be considered in relation to the survival of veteran trees and the historic landscape.</p> <p>A response to the council on this issue has been provided on page 358 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</p>	<p>SCCAS note that surviving veteran trees are important elements of the historic landscape and are strong indicators of potential archaeological remains.</p> <p>SCCAS welcome the applicant’s commitment to undertake archaeological assessment and mitigation in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] and request that this be included in the OAMS-OWSI.</p>

<p>9.16</p>	<p>Archaeology</p>	<p><b>3.12</b></p> <p><b>7.7</b></p> <p>6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181] concluded that neither groundwater levels nor groundwater receptors would be impacted by construction of above ground infrastructure, open cut trenching and trenchless crossing (paragraphs 9.7.21 – 9.7.25). Therefore, it is concluded that groundwater levels beyond the Order Limits will not be impacted and by extension the environment of any potential archaeological remains will remain unchanged.</p> <p>Geoarchaeological monitoring of Ground Investigation works at the Stour Valley took place prior to submission of the application for development consent, and the results of this work, including a deposit model, are included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]. The results revealed a sequence of natural geological layers with no archaeological</p>	<p>For clarification, SCCAS are not referring to the hydrological impacts of frack out on the aquifer, as discussed in <b>6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181]</b>. Rather, SCCAS are referring to impacts on the hydrology of the superficial deposits, which may have significant implications for the survival of organic archaeological and palaeoenvironmental remains.</p> <p>In this context, the statement that “<i>the results revealed a sequence of natural geological layers with no archaeological deposits identified</i>” does not appear to reflect the findings set out in <b>6.11.A6 Environmental Statement Appendix 11.6 – Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]</b>. That report records the presence of peats and organic silts of currently unknown date. It also notes that these deposits are likely to be of high palaeoenvironmental and archaeological significance, and that further archaeological assessment will be required.</p> <p>Given that the extent of impact will depend on the final crossing designs, SCCAS accepts that further geoarchaeological and palaeoenvironmental work may be undertaken post-consent to determine the significance of these deposits and inform appropriate mitigation.</p>
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		<p>deposits identified. Provision for further geoarchaeological work is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which, as stated earlier, will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports.</p> <p>Commitment GH11 in 7.2 Outline Code of Construction Practice [Revision D] secures the requirement for a Hydrogeological Risk Assessment to be undertaken at all trenchless crossing locations, which would include the River Stour crossing.</p>	
<p>9.17</p>	<p>Archaeology</p>	<p><b>3.13</b></p> <p><b>7.7.6</b></p> <p>The Applicant notes the comment from Suffolk County Council. For clarification, paragraph 7.7.6 of 7.4 Outline Landscape and Ecological Management Plan [REP3-030] states that a trenchless technique would be viable for either corridor. This does not preclude any specific technique.</p>	<p>Information received from the design team at the time of writing indicates that the western cable corridor is likely to be unsuitable for HDD due to the loose and soft deposits within the Alluvium and River Terrace Deposits. Direct pipe or pipejacking is likely required if cable installation proceeds in the western cable corridor. HDD may be feasible in the eastern corridor with reduced bore spacings.</p> <p>Above is the paragraph from Section 7.1 of 6.9.A4 of Environmental Statement Appendix 9.4 – Hydrogeological Risk Assessment [APP-185]. SCCAS have not seen the results of these further studies, can you please indicate where these can be found within the submissions.</p> <p>For GH11 and GH12 please see SCCAS response to NG’s response to 3.8 and 3.12.</p>

		<p>The statement in Section 7.1 of 6.9.A4 of Environmental Statement Appendix 9.4 – Hydrogeological Risk Assessment [APP-185] indicates that the western cable corridor is likely to be unsuitable. However, following further studies, this crossing is now considered more viable.</p> <p>Commitment GH11, secured in 7.2 Outline Code of Construction Practice [Revision D], states that at trenchless crossings a Hydrogeological Risk Assessment will be undertaken to assess the specific risks to groundwater and groundwater receptors and identify any additional mitigation or remediation that may be required. This is reinforced by commitment GH12, which secures further detailed and appropriate design of all trenchless crossings.</p>	
9.18	Archaeology	<p><b>3.14</b></p> <p><b>9.1</b></p> <p>Noted.</p>	Noted.
9.19	Archaeology	<p><b>3.15</b></p> <ul style="list-style-type: none"> <li>The Applicant welcomes SCCAS’s comments and draws attention to section 1.3 of 7.5 Outline Archaeological Mitigation Strategy</li> </ul>	<ul style="list-style-type: none"> <li>It is the applicant’s responsibility to ensure that all these documents work together, and to ensure that they do not contradict or create a scenario where delivery of protections of one part of the environment damages another.</li> </ul>

		<p>and Outline Written Scheme of Investigation [APP328], which states that 7.2 Outline Code of Construction Practice [Revision D] and 7.4 Outline Landscape and Ecological Management Plan [REP3-030] already address mitigation for historic buildings and the historic landscape. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] contains consideration of archaeological remains. Therefore the Historic Environment is addressed across these documents.</p> <ul style="list-style-type: none"> <li>• Geoarchaeological monitoring of Ground Investigation works at the Stour Valley took place prior to submission of the application for development consent, and the results of this work, including a deposit model, is included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP214]. The results revealed a sequence of natural geological layers with no archaeological deposits identified. Provision for further</li> </ul>	<ul style="list-style-type: none"> <li>• The statement regarding the results of <b>6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]</b> is incorrect. The report records the presence of peats and organic silts of currently unknown date. This report also notes these deposits are likely to have high paleoenvironmental and archaeological significance, and further archaeological assessment of these deposits will be required (post-consent) to determine the level of significance and appropriate mitigation dependent upon final designs for the crossings.</li> </ul> <p>Can the applicant confirm that the Hydrological risk assessment for crossing locations will include assessment of hydrology of superficial deposits and impacts on archaeological and palaeoenvironmental remains?</p> <ul style="list-style-type: none"> <li>• The OWSI specifically refers to post-consent archaeological works. The OAMS-OWSI must reflect the potential for alternative crossing methods to be employed, if HDD is considered unviable following further geological assessment.</li> </ul>
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		<p>Geoarchaeological work is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports. Commitment GH11 in 7.2 Outline Code of Construction Practice [Revision D] secures the requirement for a Hydrogeological Risk Assessment to be undertaken at all trenchless crossing locations, which would include the River Stour crossing.</p> <p>The River Stour HDD is covered by a trenchless crossing method statement (commitment B26). 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] provides the framework for evaluating and mitigating archaeological effects, including post-consent considerations, with ongoing coordination with Historic England and Local Planning Authorities. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</p>	
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		addresses the management and preservation in situ of archaeological remains. For the additional points raised here refer back to our response to matters 2.9 and 3.8.	
9.20	Skills	<p><b>5.10</b></p> <p><b>3.16.8</b></p> <p>The Applicant can confirm that it is committed to delivering an Employment and Skills Plan and that this will be secured by a DCO Requirement. The Employment and Skills Plan will be submitted into the examination at Deadline 5 as an outline document with the DCO requirement securing the preparation of a final document in accordance with the outline which shall be agreed by the relevant planning authority. The Applicant welcomes the suggestions made by Suffolk County Council with regard to the contents of the plan. Whilst outline, the document will make reference to working with the Regional Skills Coordination Function in order to align training provision through a Project-specific local education and training strategy if this is agreed by all</p>	<p>SCC welcomes the Applicant’s confirmation that a Skills and Employment Plan (“<b>SEP</b>”) will be secured through a DCO Requirement; however, SCC does not consider that the Applicant’s response fully addresses the substance of the concerns previously raised. In particular, SCC remains concerned that the Outline SEP is not yet underpinned by the level of detail and evidence required to demonstrate how workforce demand, skills provision and cumulative labour pressures will be effectively managed. The Applicant’s continued position that detailed workforce breakdowns, including skills profiles, role durations and supply-chain labour requirements, will only be available following contractor appointment does not remove the requirement to provide a robust, phase-specific evidence base at this stage. EN-1 requires that the impact of workforce influx across different construction phases is properly assessed and that likely worst-case social and economic effects are evaluated where details are not yet fixed; this expectation cannot be met where key workforce data is deferred to post-consent.</p> <p>While SCC notes the Applicant’s commitment to reference the Regional Skills Coordination Function (RSCF) within the Outline SEP, the level of commitment remains insufficiently defined. The Applicant’s position that a project-specific education and training strategy will be developed “if agreed by all parties” lacks certainty and does not reflect the role of the RSCF as the established mechanism for coordinating labour demand, aligning training provision and managing cumulative impacts across NSIPs in</p>

		<p>parties as being the most appropriate mechanism. The precise workforce breakdown for the construction, including skills and role durations for the Project, is yet to be confirmed by the Main Works Contractors. This includes details on matters such as the supply-chain workforce requirements. However, the plan will list the potential mechanisms to be used to engage and strengthen local supply chains with a commitment to sharing the precise measures to be taken with the Regional Skills Coordination Function and with other relevant organisations once these have been confirmed. These measures will be presented within the final Employment and Skills Plan post consent. The Plan will commit the Project to working with the RSCF in order to co-ordinate with the initiatives operated by other NSIPs on the matter of employment and skills provision.</p>	<p>Suffolk. SCC maintains that active participation in the RSCF, including structured data-sharing, joint planning and ongoing governance, is essential to ensure that the Project contributes effectively to a coordinated regional skills response and avoids duplication or fragmentation of provision. A high-level commitment to future engagement is not considered equivalent to a clear obligation to work through the RSCF framework.</p> <p>SCC is also concerned that the Applicant continues to defer the definition of specific interventions, supply-chain engagement measures and workforce-related outputs to a post-consent stage. While the Outline SEP refers to potential mechanisms and future information-sharing, it does not establish a clear linkage between forecast workforce demand and the scale or type of training, employment or supply-chain support required. Without this linkage, it is not possible to determine whether the proposed approach is proportionate, deliverable or sufficient to address identified skills gaps and labour market pressures. Furthermore, the absence of committed targets, monitoring arrangements and performance measures within the Outline SEP limits the ability to secure meaningful outcomes through the proposed DCO Requirement.</p> <p>While SCC supports the principle of a DCO-secured SEP, it maintains that the current approach does not yet provide the necessary level of certainty, evidence or integration with regional governance structures to ensure compliance with SCC policy and EN-1 expectations. SCC continues to require that the Outline SEP is strengthened to include phase-specific workforce assumptions, clear articulation of skills demand, defined commitments to working through the RSCF, and a robust framework for monitoring, reporting and delivery. This is essential to ensure that the SEP can be relied upon as an effective mechanism for managing</p>
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			socio-economic impacts and maximising local skills and employment outcomes across the full lifecycle of the Project.
9.21	Landscape and Visual	<p><b>Table 3: 7.4 (C) Outline Landscape and Ecological Management Plan (Tracked) [REP2-019]</b></p> <p><b>3.1</b></p> <p>The Applicant seeks clarification from the council with respect to the items that it considers remain outstanding.</p>	<p>The proposed natural regeneration of woodland (paragraph 9.3.9 of the oLEMP [REP3-031]) requires further clarification regarding how the potential need of supplementary planting of saplings will be secured and who will be responsible to carry out such works. Aftercare and management for these areas need to be secured through the DCO.</p> <p>Construction and operational lighting; both should be more clearly defined, in terms of hours, frequency, type of luminaire and fixtures, etc; operational lighting should be agreed with relevant discharging authority.</p> <p>Aftercare; the adaptive aftercare approach needs to include an adaptive aftercare <i>period</i>, in case planting struggles to achieve the required milestones or is failing; the trees to be planted as part of the OPDS should be included in the aftercare; annual monitoring reports to and annual inspections by the relevant local authority and/or the Ecology Working Group should be accommodated and required remediation measures agreed. The baseline to monitor against is the pre-construction baseline data.</p> <p>7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan (Final Issue A) [REP4-176 and REP4 -177]: There remain numerous trees and hedges without ID label; it needs to be secured, when the relevant authorities can expect to be issued with a fully updated and complete Tree Survey Plan, including Tree Schedule, and Tree Protection Plan; it should also be clarified how the losses of Category C trees will be quantified.</p> <p>Further clarification is required as to which plans are best placed to include tree protection fencing; SCC is concerned that the Vegetation</p>

			<p>Reinstatement Plans are not the right place, as these may be issued too late in the process. No works should commence (including pre-commencement works) until a fully updated and complete Arboricultural Impact Assessment (including Tree Survey and Tree Protection Plan) and an Arboricultural Method Statement, (including location specific special construction method statements, where works are to be carried out within rootzones of trees that are to be retained) in accordance with BS 5837:2012 are submitted to and agreed with the relevant LPA in writing.</p> <p>Please refer to comments in SCC Relevant Representations regarding Hedgerows [RR-3520]. In particular, the oLEMP should include commitments to secure the following:</p> <ul style="list-style-type: none"> <li>a. Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 lists Hedgerows as habitats of principal importance in England, as boundary and linear features.</li> <li>b. Any important hedgerows that are to be removed should be listed in a Schedule (Removal of Important Hedgerows) and identified on an appropriate plan.</li> <li>c. No work should be allowed to commence until full and complete hedgerow surveys have been carried out. This is necessary to inform the baseline against which Biodiversity Net Gain and the success of the LEMP need to be assessed and to agree replacements as part of the landscaping scheme.</li> </ul> <p>7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals (Final Issue A) [APP-325]: SCC would welcome further engagement with the Applicant to progress amendments to these proposals.</p>
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9.22	Landscape and Visual	<p><b>3.16</b></p> <p><b>New paragraph 9.4.3</b></p> <p>Targeted gap planting of hedgerows, where existing gaps are located within the Order Limits, will be undertaken as a hedgerow enhancement measure. Hedgerow gap planting will use appropriate native woody hedgerow species, which are characteristic of the local landscape. Further details regarding the location, quantities and species will be included within the final Landscape and Ecological Management Plan, once the design has been finalised and the precise locations for haul roads and other areas where vegetation is to be removed are known, quantified and locations where planting can take place identified.</p>	<p>SCC welcomes the additional paragraph regarding gapping up of hedges and would welcome a clear commitment in this regard.</p>
9.23	Landscape and Visual	<p><b>5.5</b></p> <p><b>3.12</b></p> <p>The Applicant maintains that compensation measures for the potential loss of veteran trees contains practicalities for implementation requiring collaboration with landowners. The mechanism for securing compensation</p>	<p>SCC (Landscape) appreciates that compensation measures for the loss of veteran trees will require collaboration with landowners. However, if this compensation relies on this collaboration and this is not forthcoming, then the compensation is in jeopardy. SCC would welcome further assurance by the Applicant that compensation for veteran tree loss will be fully secured through the DCO consent, through a clear commitment.</p> <p>SCC (Landscape) further considers that these measures also need to be agreed with the relevant local authority.</p>

		<p>will, however, be in the final 7.4 Outline Landscape and Ecological Management Plan [REP3-030] which will be agreed with the relevant Local Planning Authorities. As per the mitigation hierarchy, compensation should only be applied as a last resort. The Project has first looked to avoid impacts to ancient woodlands through the routeing, siting and design process. where it is not possible to completely avoid impacts to ancient woodland, the Project has minimised impacts through design changes or modifications to working methodology. Standard mitigation included within 7.2 Outline Code of Construction Practice [Revision D] and additional mitigation measures included within 7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032] ensure no significant long-term residual effects on ancient woodland are encountered as a result of the Project. Compensation for ancient woodland is therefore not currently proposed within the ancient woodland strategy.</p>	<p>Given that these measures would be agreed on a case-by-case basis, SCC ask for clarification on how these individual agreements will be included in the final LEMP.</p> <p>With regards to Ancient Woodlands, SCC notes that the Outline oCoCP Appendix D Dust Management Plan [REP4-167] does not appear to include any safeguarding commitments to avoid adverse impacts on Ancient Woodlands (as well as veteran/mature trees) resulting from dust.</p> <p>SCC (Landscape) further considers that the 7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] should contain a provision for compensation for Ancient Woodlands, as a safeguard in case it becomes necessary.</p>
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<p>9.24</p>	<p>Landscape and Visual</p>	<p><b>5.9</b> <b>3.12.21-3.12.26</b></p> <p>The Applicant notes the council’s comments and whilst the Applicant’s position remains unchanged on the length of the aftercare period for planting outside the Environmental Areas, the Applicant would welcome sight of the council’s monitoring evidence that this period is insufficient given this would be a deviation from National Grid’s previously consented nationally significant infrastructure projects.</p>	<p>SCC has ample experience (and records) of planting schemes that were not ready for handover after five years of aftercare. This is why SCC promotes adaptive aftercare periods. If the planting is established and thriving after five years, SCC would be content for the handover to take place. SCC considers the ‘as-required time extension’ necessary, to avoid large-scale failed planting schemes being handed back to the landowners, leaving them and Suffolk’s biodiversity worse off.</p> <p>SCC considers the delivery of successfully established replacement and mitigation planting as part of the delivery of the project as a whole and would welcome a greater commitment from the Applicant to this element of the project.</p>
<p>9.25</p>	<p>Landscape and Visual</p>	<p><b>Table 4.20: Landscape and Visual – SCC Responses to New Matters and Applicant Clarifications 5.48</b></p> <p><b>Table 4.20 (13.166, 13.186 and 13.187)</b></p> <p>The Applicant acknowledged SCC’s concerns and has addressed them in 8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030] (see page 89), confirming the Final Landscape and Ecological Management Plan (LEMP) will be subject to the agreement of the LPA.</p> <p>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient</p>	<p>As previously stated in [REP3-085], it is not only about the final LEMP(s) being agreed with the relevant discharging authority, but also about the final mitigation measures and remediation works, and long-term monitoring referred to within.</p>

		<p>Woodland and Veteran Tree Strategy [REP3-030] states ‘The final mitigation measures, remediation works and long-term monitoring are to be agreed at detailed design stage with the Project arboriculturist and the relevant landowners on a case-by-case basis.’</p> <p>This passage above is referring to the Final LEMP, which will be agreed with relevant LPAs.</p>	
<p>9.26</p>	<p>Landscape and Visual</p>	<p><b>5.49</b> <b>Table 4.20 (13.16)</b></p> <p>The Applicant has responded to this topic in its response to question HE 1.10 provided in 8.9.1 Applicant's Responses to First Written Questions [REP3-074].</p> <p>‘Sensitivity testing’ has been undertaken to determine if changes to the design within the LoD would affect the assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].</p> <p>Alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While</p>	<p>SCC’s position remains unchanged. Changes within the Limits of Deviation could also affect residential properties which are not historic assets, but for which changes could make matters worse, even if they are within the same assessment bracket.</p>

		<p>alternative locations within the LoD have been considered, 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068] comprehensively accounts for the reasonable worst-case physical and setting impacts on heritage assets. Therefore, no significant effects beyond those reported in the 11.7 Residual Effects section of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets, specific commitments are set out in 7.2 Outline Code of Construction Practice [Revision D] to restrict the longitudinal LoD. The assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD; and the potential effects of a vertical</p>	
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		increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans Sections A and B [APP 017 and APP-018], Section C [Revision B], Sections D to G [APP-020 to APP-023] and Section H [Revision B].	
9.27	Landscape and Visual	<p><b>5.51</b></p> <p><b>Table 4.20 (13.194 – 13.197)</b></p> <p>The Applicant welcomes the council’s detailed suggestions as set out in the LIR. As previously stated within 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] (in Table 4.20, ID 13.194 -13.97, pages 477 - 478), the detail of construction stage planting plans is to be provided in the final LEMP, and will be approved by the Local Planning Authorities.</p>	As mentioned earlier in this table, SCC would welcome further engagement with the Applicant to achieve agreement on the outline proposals for the Wenham CSEC. SCC is concerned that if the proposals are consented as they currently are, the outcomes for mitigative planting will be insufficient and views from VP 3.25 [APP-346] will remain open.

<b>Table 10: 8.4.10 (A) Applicant’s Comments on Responses to ExQ1 [REP4-299]</b>			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC’s Comments</b>
10.1	Planning	<p><b>ALT 1.7</b></p> <p>The Applicant notes and welcomes Suffolk County Council and Mid Suffolk Council’s acceptance of the Applicant’s reasoning for not progressing with the Waveney Valley Alternative. The Applicant has addressed the need for landscape compensation in 8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030] (see Section 3.10) and the response to written questions LV 1.18 and LV 1.28 in 8.9.1 Applicant’s Responses to First Written Questions [REP3-074].</p> <p>In summary, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations ) do not treat offsetting (or the similar word ‘compensation’) in the same way as prevention or reduction. The Environmental Statement is fully compliant with the EIA Regulations; it clearly sets out measures incorporated to avoid, prevent, reduce and, if possible, offset likely significant effects. The above aligns with The National Grid (Bramford to Twinstead Reinforcement) Order 2024, where the Examining Authority and the Secretary of State were similarly satisfied that there is no requirement in policy to</p>	<p>SCC (Planning) maintains its positions as set out in answer to ALT 1.7 <b>[REP3-086]</b>.</p> <p>As stated in answer to ExQ2 GEN 2.2, SCC has outlined its expectations of the Applicant in regard to committing to a legal agreement concerning the Waveney Valley. The Council has included in this answer, justification for which it considers the request meets the relevant tests.</p>

		<p>compensate all residual landscape and visual effects. The Applicant is also of the view that compensation is not required for every environmental effect, unless it is expressly referred to in National Policy Statement (NPS) EN -1 (2024).</p> <p>Notwithstanding this position, the Applicant has sought and received information in relation to the specific compensatory measures requested by Suffolk County Council and Mid Suffolk District Council and is currently seeking justification for this request against the Regulation 122 tests. Once received, the Applicant will review this information.</p>	
10.2	Skills	<p><b>SET 1.5</b></p> <p>The use of ‘where practicable’ within the outline control documents is necessary in each instance of its use and a justification in the context of the Project for each case was submitted in the Applicant’s response to SET 1.5 in 8.9.1 Applicant’s Responses to First Written Questions [REP3-074]. The term reflects the status of the relevant detail, and appropriate flexibility, at this outline stage in the usual manner and falls to be considered alongside:</p> <ul style="list-style-type: none"> <li>• requirement 4 of 3.1 draft Development Consent Order [Revision D] which requires that detailed control documents which are substantially in accordance with their relevant outline control document must be approved by the relevant planning authorities prior to commencement of</li> </ul>	<p>Suffolk County Council (Skills) does not agree with the Applicant’s response and maintains that the use of the term “<i>where practicable</i>” remains inappropriate for mitigation relied upon within the Environmental Statement. While SCC notes the Applicant’s reference to DCO Requirements and precedent from the Sizewell C examination, these do not address the fundamental issue of clarity, certainty and enforceability. The presence of approval mechanisms within the DCO does not remove the ambiguity inherent in the term itself, nor does it provide a clear and consistent basis for determining when mitigation may not be delivered. The Applicant’s reliance on precedent is also not determinative; each application must demonstrate that mitigation relied upon to support conclusions of non-significant effects is sufficiently</p>

		<p>the relevant stage of the authorised development; and</p> <ul style="list-style-type: none"> <li>• requirement 1(4) which states that where an approval is required under the terms of a requirement or document referred to in a requirement, approval may only be given by the relevant planning authority where the authority is satisfied that the subject matter of the approval does not give rise to any new or materially different environmental effect.</li> </ul> <p>The term ‘where practicable’ is thus not the final word for the resulting mitigation measures to be set out in the detailed control documents, and would be constrained in the usual manner by the scope of environmental effects which have been assessed. [...]</p>	<p>specific, certain and enforceable within the context of the current Project.</p> <p>SCC remains concerned that the continued use of “where practicable” introduces discretion and flexibility to mitigation delivery, particularly where such measures support conclusions within the ES. The explanation provided from the Sizewell C case reinforces this concern, as it demonstrates that decisions not to implement mitigation may ultimately be based on subjective judgements of cost, effort or difficulty, rather than a clearly defined and consistently applied standard. This creates a risk that mitigation could be weakened or not delivered in practice, with limited transparency or accountability. While SCC recognises that a degree of flexibility is necessary at outline stage, this must be balanced against the requirement for mitigation to be clearly defined and capable of enforcement through the DCO.</p> <p>SCC maintains that alternative wording is necessary to provide clarity and accountability, particularly for mitigation measures relied upon to support conclusions of non-significant effects. The wording previously proposed by SCC, which requires mitigation to be implemented unless it can be demonstrated to the satisfaction of the relevant local authority that it is not feasible and that equivalent mitigation will be delivered, remains appropriate and consistent with established DCO practice. SCC therefore considers that the Applicant’s response does not resolve the concern raised and that the drafting of mitigation measures should be revised to ensure</p>
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			they are sufficiently certain, enforceable and capable of effective monitoring.
10.3	Landscape and Visual	<p><b>LV 1.26</b></p> <p>The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] and Table A13.1.1 LVIA Study Area of 6.13.A1 Environmental Statement 13.1 Landscape and Visual Methodology [APP-227]. Viewpoints are largely contained within the 3 km Study Area; however, some more distant viewpoints up to 5 km from the Project were considered, including the following within Suffolk:</p> <ul style="list-style-type: none"> <li>• Viewpoint 3.20 Fenbridge Lane (4.2 km)</li> <li>• Viewpoint 3.24 Higham Hill, south of Lower Raydon (4.2 km)</li> <li>• Viewpoint 3.27 B1066 Park Road, near Thorington Street (4.8 km).</li> </ul> <p>Additional viewpoints would not change the outcome of the Landscape and Visual Impact Assessment (LVIA).</p>	<p>SCC notes the response by the Applicant. While the viewpoints and their viewing directions mentioned are beyond 3km from the proposed infrastructure, almost all are within the 3km study area, despite visibility beyond this any several locations.</p>
10.4	Landscape and Visual	<p><b>LV 1.34</b></p> <p>The Applicant notes Essex County Council's position on replacement planting and agrees that a 3:1 planting ratio would not be suitable to compensate loss of</p>	<p>While SCC welcomes the principle of the OPDS, SCC shares the concerns of the other host authorities. SCC considers that further reassurance for an accurate baseline (i.e. how many trees, of which quality and at which location were lost), a</p>

		<p>irreplaceable habitat. Outline compensation for veteran trees is provided in Table 5.1 in 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]. Paragraph 5.4.53 of National Policy Statement EN-1 (2024) requires that ‘a suitable compensation strategy exists’ if there is a loss or deterioration of any irreplaceable habitats. If the veteran trees cannot be retained during the detailed design stage, the compensation measures would be agreed on a case-by case basis with landowners and detailed in the final Landscape and Ecological Management Plan. The compensation measures proposed will be implementable and proportionate to the impacts attributed to the final detailed design. [...]</p>	<p>strategic approach linked to LNRS, greater engagement and agreement with the relevant local authorities, an adaptive aftercare period and annual monitoring reports to and site inspections with the relevant host authorities will be required. The OPDS should be included into the tasks of the Ecology Working Group.</p> <p>SCC further considers that the Applicant should strive to identify sites as early as possible and should start an advanced planting scheme. While final numbers of trees lost will emerge later, it should be possible to anticipate a core number of trees that will not be replaceable within the Order Limits.</p>
10.5	Archaeology	<p><b>HE 1.9</b></p> <p>The Applicant has provided detailed responses regarding archaeology in response to HE 1.43, HE 1.44, HE 1.45, HE 1.46 and HE 1.47 in 8.9.1 Applicant’s Responses to First Written Questions [REP3-074]. [...]</p>	<p>SCCAS has provided detailed comments regarding the applicant’s responses in <b>Comments on any further information or submissions received by deadline 3 [REP4-335]</b>. Table items: 9.13, 9.14, 9.15, 9.16 and 9.17</p>

<b>Table 11: 8.5.8 (A) Applicant’s Responses to Issue Specific Hearing 2 Action Points [REP4-303]</b>			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC’s Comments</b>
11.1	Archaeology	<p><b>13</b></p> <p><b>Article 23 Removal of human remains</b></p> <p>Suffolk County Council to provide comments on the Applicant’s response to ExQ1 DCO 1.28.</p> <p>The Applicant has responded to this point in response to DCO 1.A28 in <b>8.9.1 Applicant’s Responses to First Written Questions [REP3-074]</b>.</p>	<p>See SCC Archaeological Services response to DCO 1.A28 in 8.9.1 Applicant’s Responses to First Written Questions <b>[REP3-074]</b> in Comments on Submissions received at Deadline 3 <b>[REP4-335]</b> Table Matter 9.9.</p>
11.2	Landscape and Visual	<p><b>18</b></p> <p><b>Schedule 3 requirement 9: Reinstatement planting plan</b></p> <p>6.5 Environmental Statement Chapter 5 - Environmental Impact Assessment Approach and Method [APP-135] paragraphs 5.4.21 to 5.4.31 explain what the Applicant is proposing in terms of mitigation, enhancement and compensation (referred to as offset in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017). 7.1 Biodiversity Net Gain Report [APP-299] details in Section 3.5 how habitat creation and enhancement on-site will be delivered through replacement planting and within the Environmental Areas. The Environmental Areas are multi-functional areas where landscape mitigation and biodiversity gains can be achieved together. The mitigation planting provided for landscape and visual has therefore been included within the BNG metric. The BNG methodology requires</p>	<p>SCC (Landscape) welcomes clarifications provided by the Applicant.</p> <p>SCC (Landscape) considers that, as there will be aftercare and monitoring requirements, plans will be required that show the OPDS locations and that the provision of these needs to be secured as part of the DCO consent process, for example through a commitment in the REAC and oLEMP. The trees relating to the OPDS could be included in the Reinstatement Planting Plan.</p>

		<p>all on-site habitats post-development (i.e. on completion of all works including landscaping), to be inputted into the BNG metric. This post-development metric therefore includes all habitats to be retained, habitats to be improved, habitats to be reinstated and habitats to be created across the Project. The BNG assessment therefore includes all land within the Environmental Areas. The BNG additionality principle also allows for landscape mitigation and habitat mitigation to be included within the BNG calculation. The Project will deliver any biodiversity deficit, in order to achieve 10% net gain, through off-site third-party habitat banks as set out within 7.1 Biodiversity Net Gain Report [APP-299]. [...]</p>	
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<b>Table 12:</b> 8.16 (A) Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317]			
<b>Table Item</b>	<b>Service Area and/or Topic</b>	<b>Referenced Paragraph or Item</b>	<b>SCC’s Comments</b>
12.1	Health and Wellbeing	<b>General Approach</b>	<p>SCC (Public Health) considers that the Technical Note does not currently address cumulative or overlapping pressures. It is therefore recommended that the updated Chapter 10 submission considers areas experiencing localised deprivation and/or changing vulnerability that are also subject to other NSIP activity and/or development. The assessment should examine how these combined pressures may interact and potentially amplify impacts on mental health and wellbeing over time.</p> <p>Public Health requests that the updated Chapter 10 submission also include an accompanying analysis setting out how revisions to the baseline information may alter the assessment of construction related impacts, and whether effects previously assessed as “not significant” remain appropriate in light of newly identified populations or changes in population vulnerability.</p> <p>Public Health welcomes the observations set out in paragraph 3.2.1, which state: <i>“In areas where there has been a relative increase in deprivation, for example parts of Braintree and Mid Suffolk, the updated data may highlight greater vulnerability among local populations. This could require targeted consideration of potential health impacts, particularly in relation to capacity for community resilience.”</i> This observation reinforces the need for a precautionary approach to assessing and managing construction impacts. In particular, Public Health considers that where prolonged construction activity affects communities experiencing increased or persistently high levels of deprivation, community resilience is likely to be reduced. In line with previous SCC’s (Public Health) previous submissions, this further strengthens the justification for restricting working hours to provide predictable periods of respite for affected communities. It also supports the implementation of a Mental Health and Wellbeing Monitoring Plan to ensure that risks of adverse effects on mental wellbeing, particularly for vulnerable groups, are identified at an early stage and appropriately mitigated.</p>

12.2	Skills	<b>General Approach</b>	<p>SCC (Skills) considers that the scope of the Technical Note is limited to a high-level comparison of deprivation indices and does not address the core issue raised in previous submissions, namely whether updated baseline conditions materially affect labour market capacity, skills availability, or cumulative workforce pressures arising from the Project. As a result, it does not address the main ways the Project is expected to generate effects, particularly in relation to construction labour demand and skills requirements.</p> <p>SCC notes that the Technical Note concludes that deprivation levels at local authority level remain “broadly comparable” between 2019 and 2025. SCC considers that this conclusion is overly high-level and does not sufficiently consider the implications of changes within specific deprivation domains, particularly employment and education, skills and training. These domains are directly relevant to labour market capacity and skills availability. While overall rankings may appear stable, the Technical Note itself identifies changes within these domains across local planning authorities, yet does not assess whether these changes influence the ability of the local labour market to meet Project demand.</p> <p>The Technical Note places significant emphasis on methodological limitations in comparing IMD datasets. While these limitations are acknowledged, SCC considers that they are used to support a general conclusion that changes are not material, without undertaking a proportionate assessment of how even small shifts in deprivation, particularly in skills, employment and access to services, may affect labour market resilience. In the context of a large infrastructure project with significant workforce requirements, even marginal changes in labour market conditions may be relevant to the scale of effects, particularly when considered cumulatively with other NSIPs.</p> <p>The Technical Note identifies localised changes in deprivation at LSOA level, including areas experiencing worsening conditions in specific domains such as education, skills and training. However, these findings are not carried through into the assessment of implications. SCC considers that this lack of alignment weakens the reliability of the conclusions, as localised deprivation is particularly relevant to understanding access to employment opportunities, potential for local workforce participation and the need for targeted skills interventions.</p>
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			<p>SCC does not agree with the conclusion that updated IMD data does not materially alter the sensitivity of economy and employment receptors. This conclusion is reached without revisiting the underlying assumptions in the ES, including the assumed availability of labour and the distribution of skills within the Wider Study Area. Sensitivity is partly determined by the availability of labour and skills and the risk of labour market pressure. The Technical Note does not reassess these factors in light of updated data, nor does it consider whether areas experiencing changes in education, skills and training deprivation may have reduced capacity to supply the required workforce.</p> <p>The Technical Note does not address the implications of IMD updates for cumulative labour market pressures. No assessment is made of how overall deprivation interacts with the scale and timing of workforce demand from this Project in combination with other NSIPs. This is critical given that the purpose of understanding baseline socio-economic conditions is to enable assessment of cumulative effects on labour supply, skills availability and displacement risks. The Technical Note does not provide any additional evidence to support the conclusions of the cumulative assessment in the ES, nor does it update the underlying labour market context in a way that would allow such conclusions to be tested.</p> <p>SCC does not believe that the Technical Note does not engage with the skills profile of the local population in a meaningful way. While IMD includes an education, skills and training domain, the analysis does not disaggregate this information or link it to the types of skills required for construction of the Project. This is particularly important given that the ES identifies an existing skills gap within the Wider Study Area, including a higher proportion of residents with no qualifications and lower levels of higher qualifications compared to regional and national averages. The Technical Note does not consider whether updated IMD data reinforces, reduces or alters this baseline position.</p>
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# NORWICH TO TILBURY

EN020027

## **APPENDIX 1** LEWG Requirement

Comments on Submissions received at Deadline 4

Suffolk County Council 

# 1 Requirement to provide for the establishment of a Landscape and Ecology Working Group

## Schedule 3 (Requirements)

### X. Landscape and Ecology working group

(1) Prior to the submission, in accordance with requirement 4(1)(c), of the first landscape and ecological management plan, the undertaker must establish the landscape and ecology working group to discharge the role of that group in accordance with the provisions of Schedule [X] (membership, role and protocol of the landscape and ecology working group).

(2) The membership, role and protocol of the landscape and ecology working group must be as set out in Schedule [X] and the group must be administered by the undertaker, and operated, in accordance with the provisions of Schedule [X].

(3) The first meeting of the landscape and ecology working group must be held before the submission of the first landscape and ecological management plan and it must continue its duties until the authorised development has been decommissioned, in accordance with requirement 13 (decommissioning), unless otherwise agreed by the ecology working group.

### Schedule [X] (membership, role and protocol of the landscape and ecology working group)

1. — (1) The landscape and ecology working group (“LEWG”) will comprise -

(a) two representatives to be nominated by the undertaker (one of whom must be a suitably qualified ecologist);

(b) one representative to be nominated by each of the following local authorities –

(i) Babergh & Mid-Suffolk District Council;

(ii) Broadland & South Norfolk District Council

(iii) Colchester Council;

(iv) Essex County Council;

(v) Norfolk County Council;

(vi) Suffolk County Council; and

(vii) Tendring District Council.

- (2) The LEWG shall encourage participation at its meetings by representatives of the Environment Agency, Natural England, any relevant National Landscape team, any relevant Wildlife Trust, and such other person whose attendance representatives of the LEWG may from time to time consider to be beneficial.
2. — (1) The undertaker is responsible for convening and holding meetings of the LEWG.
- (2) The LEWG must meet at least annually, either virtually or in a convenient location to be identified by the undertaker and agreed by the representatives of the LEWG.
- (3) Meetings will be –
- (a) chaired by the undertaker;
  - (b) quorate if at least five representatives are present.
3. — (1) The undertaker must consult the LEWG on –
- (a) the development of any landscape and ecological management plan, to be submitted in accordance with requirement 4(1)(c) (construction management plans), and each plan must explain how this has been done;
  - (b) the implementation of the ecological aspects of any approved landscape and ecological management plan, including monitoring;
  - (c) the provision of adaptive aftercare, in accordance with the outline landscape and ecological management plan; and
  - (d) the development of any habitat management and monitoring plan to be developed, in accordance with the outline landscape and ecological management plan.
4. — (1) In addition to responding to the consultations mentioned in paragraph (3), the role of the LEWG will be to –
- (a) advise on the achievement of biodiversity mitigation and enhancement in respect of the authorised development;
  - (b) advise on the way in which the undertaker communicates on biodiversity matters to the LEWG representatives mentioned in sub-paragraph (b) of paragraph 1(1) and those bodies mentioned in sub-paragraph (2) of paragraph 1;
  - (c) advise on the co-ordination of any [biodiversity-related] research project [arising from] [related to] the authorised development, the dissemination of any outcomes, and the provision of feedback to the undertaker and to relevant stakeholders;
  - (d) review the monitoring undertaken in accordance with any landscape and ecological management plan;

- (e) determine whether the ecological commitments and outcomes set out in the outline landscape and ecological management plan are being met; and
- (f) if the commitments and outcomes in the outline landscape and ecological management plan are not being met, to agree reasonable actions that the undertaker must implement in an agreed time, in order to meet those commitments and outcomes.

5. — (1) The undertaker must pay for –

- (a) all reasonable costs arising from the attendance of attendees at any meeting of the LEWG (which shall include reasonable transport and preparation costs); and
- (b) such other costs of the LEWG representatives, provided these have been agreed in advance by the undertaker.

6. — (1) In this requirement –

“a suitably qualified ecologist” means an ecologist with appropriate academic qualifications, relevant experience of tree species selection, habitat reinstatement and arboricultural good practice, and membership of an appropriate professional body such as the Chartered Institute of Ecology and Environmental Management.

“any relevant Wildlife Trust” and “any relevant National Landscape team”, means any Wildlife Trust, or any National Landscape team, as the case may be, located within the administrative area of any of the local authorities mentioned in paragraph 1(1)(b).