

NORWICH TO TILBURY

EN020027

Comments on Submissions received at Deadline 5

Suffolk County Council 

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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>LIR</i>	<i>Local Impact Report</i>
<i>LPA</i>	<i>Local Planning Authority</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>

“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 5 (“**D5**”) for Norwich to Tilbury. Examination Library references are used throughout to assist readers.

Comments on submissions received at Deadline 5

Table 1: 3.1 (E) Draft DCO [REP5-061]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
1.1	Archaeology	Schedule 3 (Requirements) Requirement 5 (Archaeology)	Requirement 5(1) currently refers to “<i>No archaeological evaluation...</i>”. This is not sufficient, as the requirement needs to control commencement of the authorised development itself. As drafted, there is a potential scenario in which construction or other archaeologically damaging activities could commence before archaeological evaluation and any necessary mitigation have been carried out. Part 1 should therefore be amended so that no stage of the authorised development may commence, including pre-commencement operations involving intrusive groundworks, until an appropriate detailed Written Scheme of Investigation for archaeological evaluation has been submitted to and approved. SCCAS suggested wording: <u>“(1) No stage of the authorised development may commence including any pre-commencement operations that involve intrusive groundworks which for the avoidance of doubt includes vegetation removal where that removal involves intrusive groundworks until a detailed</u> <i>Written Scheme of Investigation for archaeological evaluation works for that stage or relevant part of the authorised development has been submitted to and approved by the relevant planning authority, following consultation with the relevant county planning authority’s archaeological or historic environment service and, if relevant, Historic England.</i>” Part 2 should also be amended to include pre-commencement operations involving intrusive groundworks. It should secure the subsequent mitigation strategy, whether

			preservation in situ or preservation by record, and ensure that this is informed by the archaeological evaluation carried out under Part 1 and by the archaeological evaluation that has been completed prior to submission. SCCAS suggested wording: <u>“(2) No stage of the authorised development may commence, including any pre-commencement operations that involve intrusive groundworks which for the avoidance of doubt, includes any vegetation removal, where this removal includes intrusive groundworks until for that stage either a preservation in situ Management Plan or a detailed written scheme of investigation, which accords with the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation and is informed by the pre-commencement archaeological evaluation under part (1) and the works that have been completed prior to submission, has been submitted to and approved by the relevant planning authority, in consultation with the relevant county planning authority’s archaeological or historic environment service and, if relevant Historic England.”</u> With these amendments, Part 3 could be removed, as SCCAS amended Parts 1 and 2 would clearly set out the process for archaeological evaluation and subsequent mitigation. Parts 4 and 5 are acceptable. Part 6(a) is acceptable. Part 6(b) should be amended to provide a fixed timeframe for submission of the archaeological Updated Project Design. As currently worded, linking the timeframe to approval of the final site-specific post-excavation assessment is problematic. If the final assessment is delayed or not approved, this could prevent submission of the Updated Project Design in a timely manner. The discharging authority also requires a fixed point from which to monitor compliance.
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			SCCAS suggested wording: <i>“No later than two years following completion of construction, an archaeological updated project design must be submitted to, and approved by, the relevant planning authority following consultation with the county planning authority’s archaeological or historic environment service or, if relevant, Historic England. The archaeological updated project design must be in general accordance with the outline archaeological mitigation strategy and outline written scheme of investigation and set out scope for full post-excavation analysis and publication.”</i> The sentence <i>“...and have regard to the site-specific research agendas set out in the detailed written schemes of investigation.”</i> should be removed. The Updated Project Design should be informed by the results of the archaeological fieldwork and define the research agendas appropriate to the archaeology identified during the fieldwork. In effect, the Updated Project Design is an updated detailed Written Scheme of Investigation for post-excavation analysis, publication and archiving. Parts 6(c) and 6(d) are acceptable. Part 7 should be removed, as the matters it seeks to address would be properly controlled through SCCAS amended Parts 1 and 2. As currently drafted, Part 7 is not acceptable because it creates a circular and potentially ineffective control mechanism. The Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation are process documents and do not contain the necessary site-specific detail to determine, approve or secure the archaeological works required in advance of intrusive pre-commencement operations. This is particularly problematic because pre-commencement operations may include intrusive groundworks. Such works have the potential to affect archaeological remains before evaluation has been completed and before appropriate mitigation has been agreed. It is therefore necessary to secure archaeological evaluation in advance, in order to inform appropriate mitigation, whether through preservation in situ or
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			preservation by record. Any such mitigation must be implemented in accordance with a detailed Written Scheme of Investigation or preservation in situ management plan that has first been submitted to and approved by the relevant planning authority, following consultation with the relevant archaeological adviser and, where relevant, Historic England. It is SCCAS's position that Requirement 5 should expressly include pre-commencement operations involving intrusive groundworks within Parts 5(1) and 5(2). This approach is reflected in the Sea Link DCO requirement wording, which provides that no stage of the authorised development may commence, including pre-commencement operations involving intrusive groundworks, until either a preservation in situ Historic Environment Management Plan or a site-specific Written Scheme of Investigation has been submitted to and approved. Sea Link DCO requirement 14 part 2: <i>“(2) No stage of the authorised development may commence, including any pre-commencement operations that involve intrusive groundworks which for the avoidance of doubt, includes any vegetation removal, where this removal includes intrusive groundworks until for that stage either a preservation in situ Historic Environment Management Plan or a site-specific written scheme of investigation, which accords with the relevant Overarching Written Scheme of Investigation and is informed by the pre-commencement archaeological surveys, has been submitted to and approved by the relevant planning authority, in consultation with Historic England.”</i> On this basis, archaeological Requirement 5 should be amended to ensure that intrusive pre-commencement operations cannot commence until the archaeological work has been completed under a detailed written scheme of investigation or the parcel of land has been released back to the developer by the relevant archaeological or historic environment service, following completion of the archaeological evaluation.
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Table 2: 3.5 (D) Schedule of Changes to the Draft DCO [REP5-065]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
2.1	Skills	Item 14 – Schedule 3 requirements (paragraph 15)	SCC welcomes the inclusion of Requirement 15 within Schedule 3 of the draft Development Consent Order (“DCO”), providing a mechanism for securing an Employment and Skills Plan (“ESP”). SCC agrees that the principle of requiring a Final ESP prior to commencement is appropriate. However, SCC considers that the current drafting does not provide sufficient certainty, control or enforceability to ensure that the ESP will operate as an effective mechanism for managing the socio-economic impacts of the Project and delivering meaningful skills, employment and supply chain outcomes. As currently drafted, Requirement 15 requires submission prior to commencement but does not require the ESP to be approved before works begin. This creates a risk that the document may not be adequately scrutinised or agreed and that deficiencies in its evidence base, scope or delivery mechanisms cannot be resolved prior to implementation. In SCC’s view, this significantly weakens the effectiveness of the Requirement as a control. SCC considers that the Requirement must secure formal approval of the ESP by the relevant local authorities. Approval is necessary to ensure that the ESP is consistent with the Outline ESP, incorporates sufficient detail on workforce demand, skills interventions and supply chain measures as well as aligns with local and regional governance arrangements, including the Regional Skills Coordination Function (“RSCF”). SCC also has concerns regarding the use of the terms “substantially in accordance with” and “general accordance” within the drafting of the Requirement. These introduce a degree of flexibility which, in the absence of sufficient detail within the Outline ESP, creates uncertainty as to how compliance will be assessed and what level

			of deviation from the outline document would be acceptable. Given SCC's existing concerns about the limited level of detail in the Outline ESP, reliance on such broadly framed wording risks allowing further dilution or alteration of commitments at the post-consent stage without any clear mechanism for ensuring equivalence or adequacy. This reduces the degree of certainty that the Requirement can provide. These concerns are amplified by the substantive issues identified in SCC's previous submissions, including at Deadline 4, regarding the Outline ESP. In particular, SCC has identified that there is currently no clear linkage between forecast workforce and supply chain demand and the interventions required to address it; that key elements, including interventions and outputs, are deferred to the post-consent stage; and that there are no defined targets, monitoring arrangements or performance measures. In this context, the effectiveness of Requirement 15 is critical. However, as currently drafted, the Requirement does not provide sufficient assurance that these matters will be addressed within the Final ESP, nor that the resulting document will be proportionate, deliverable and evidence-led. This, in turn, raises concerns as to whether the Requirement is sufficiently precise and enforceable, particularly given that the ESP is intended to play a key role in managing socio-economic impacts. SCC therefore considers that Requirement 15 must be strengthened to ensure clarity, certainty and enforceability. In particular, it should require the ESP to be approved in writing by the relevant local authorities prior to commencement, with approval contingent upon the authority being satisfied that the ESP is supported by a robust, phase-specific assessment of workforce and supply chain demand, includes clearly defined interventions aligned to that demand, establishes appropriate governance arrangements including engagement through the RSCF, and contains clear targets, monitoring and reporting mechanisms. Consideration should also be given to strengthening the wording of compliance with the approved ESP, and to providing for ongoing review and updating of the ESP, subject to local authority approval, where necessary to respond to changing labour market conditions or cumulative impacts.
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Table 3: 7.2 (B) Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [REP5-148]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
3.1	Joint Emergency Planning Unit	Section 5.2 / Table 5.2	Contact details for Emergency Services – Specifically looking at the Suffolk Fire and Rescue Service details listed but the point is likely to be applicable for the other county areas, these are routine contact details. Are they required? In an emergency requiring any of those services it will be a call to 999 (as the line in bold and underlined above states). Does the inclusion of these numbers risk causing confusion for the Site Manager? Is there a reason why the non-emergency numbers are required? As of Deadline 6, the questions above remain. In addition, Suffolk Fire and Rescue Service non-emergency out of hours contact number has changed to 01473 369016 (see https://www.suffolk.gov.uk/suffolk-fire-and-rescue-service/about-suffolk-fire-and-rescue-service/contact-suffolk-fire-and-rescue-service-with-non-emergency-queries)
3.2	Joint Emergency Planning Unit	Section 5.2	Ipswich Hospital is not listed here. There may be a reason for this, but this note is made in case it has been missed. As of Deadline 6, Ipswich Hospital is not listed in this version.
3.3	Joint Emergency Planning Unit		Bold and underlined text - The reference to 'Amber Alert' jumps between warning levels and systems and could cause a bit of confusion. The National Severe Weather Warning Service uses the Red, Amber, Yellow descriptors and the EA Flood Warning Service uses 'Flood Alert, Flood Warning, Severe Flood Warning' (the colours of the triangle symbols being Red - Severe Flood Warning, Red - Flood Warning, Amber – Flood Alert, as seen on the pages 20 and 21).

			Is the site manager notifying on-site personnel on receipt of a Flood Alert or a Flood Warning? It may be useful to consistently use the same terminology i.e., <i>'Upon receipt of an EA Flood Warning the site manager(s) shall notify on-site personnel of the Flood Warning and complete a review to ensure that the site is in a state of readiness ahead of a potential flood situation'</i>. As of Deadline 6, the above point is still valid and could result in confusion on site. While this plan is focussed on flooding, the Met Office Weather Warning System is used for many types of weather/hazard. 6.2.2 currently suggests that weather warnings will follow step by step i.e., suggesting that a yellow warning will be received first, followed by an amber warning, followed by a red warning. This may not always be the case. Consider changing 6.2.2 to be more descriptive to avoid any confusion i.e., <i>'Upon receipt of a Met Office Weather Warning the site manager(s) shall notify on-site personnel of the Warning ensuring they are aware of the information contained in the 'what to do' section of the table below and complete a review to ensure that the site is in a state of readiness ahead of a potential flood situation'</i>.
3.4	Joint Emergency Planning Unit	Section 7.1.1	The colour of Trigger Level 3 does not align with the EA Flood Warning Service descriptors (see above comment). Recognising that this then directs to the site actions which do use a Yellow, Amber, Red system it is worthwhile considering how this could be confusing for site personnel, i.e., Severe Weather Warning has a red colour warning triangle and building which then equates to an Amber Alert site action. As of Deadline 6, the above point is still valid and could result in confusion on site.

3.5	Joint Emergency Planning Unit	Section 7.2 / Table 7.1	Flood Evacuation Procedures – Level 1 procedures state ‘initiate implementation of FWEPP Procedures’. What does this include? At the moment this reads that on receipt of a Flood Alert, no further action is taken. The second level then goes into receipt of a Flood Warning. As of Deadline 6, the above point is still valid.
3.6	Joint Emergency Planning Unit	Section 7.2 / Table 7.1	Level 2 procedures include signage to evacuation points. Is this the same signage as any other evacuation signage used by the site? What does it look like? It may be worthwhile including an image or description of this in the plan or signposting to/referencing any documentation that explains what this looks like, i.e., health and safety briefings for site personnel. As of Deadline 6, the above point is still valid.
3.7	Joint Emergency Planning Unit	Section 7.3.1	The sentence is ‘If an evacuation point is on private land, it would be the responsibility of the contractor to communicate with the landowner regarding access’. Should this also be added to the pre-occupation actions at section 4? Currently that sections states that the designated point should be located on public land outside the extreme flood extent, with no mention to private land. As of Deadline 6, the above point is still valid. Should the private land aspect be added to section 4 to act as a greater prompt for the Site Manager to explore pre-occupation.
3.8	Joint Emergency Planning Unit	Annex A – Supporting Figures	The flood risk mapping used to develop the Flood Risk has been updated recently, possibly post the National Grid access to the website. Although this may not affect the assessment it would be worthwhile checking this.

Table 4: 7.3 (D) Outline Construction Traffic Management Plan [REP5-150]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
4.1	Highways	5.2.2	Surveys may also be required on minor roads used as Secondary Access Routes where the width of carriageway, bends or other features may result in damage to the highway. No commitment to undertaking repairs and SCC seeks repairs to all roads that may be affected i.e. PARs, secondary access routes, diversion routes (including informal) during construction activities: 5.2.3 wording not explicit regarding this commitment.
4.2	Highways	5.4.2	Where use is made of roads not designated as PARs the routing of HGVs shall be agreed in advance with the LHA. Specific concerns are the number and routing of HGVs associated with construction and removal of site accesses and cross overs (Table 5.2). In the absence of the haul road this may lead to the use of unsuitable local roads which may be avoided or minimised using the LHAs knowledge of the network. SCC is still waiting for a list of Non-primary Access Routes
4.3	Highways	5.4.19	The LHA should be consulted if any exceedances are predicted not just if the National Grids EnvCoW considers that these would have the potential to introduce materially new or materially different residual effects. To do so otherwise allows no independent oversight of the transport movements to demonstrate they will remain within the forecast used to assess impacts.
4.4	Highways	5.8.3	Where access for cyclists and pedestrians cannot be provided a suitable alternative route must be provided.
4.5	Highways	5.8.6, 5.8.10, 5.8.12	Division routes will need to be agreed with LHAs to ensure they are adequate and avoid other planned or emergency works. This will be a requirement of the LHA issuing a NRSWA permit.

4.6	Highways	6.3.1	SCC remain concerned about the lack of visibility of any non-conformance with the CTMP occurring as this remains with the undertaker and LHA's only informed, if needed, corrective action is required other than in the quarterly report (6.3.3). 6.3.2 states that further sanctions (but not reporting) <u>could</u> be included within the final CTMP.
4.7	Highways	6.4.1 (Enforcement)	Enforcement (6.4.1) does not include actions taken to ensure HGV numbers remain within the assessed values.

Table 5: 7.3 (B) Outline Construction Traffic Management Plan Appendix B - Outline Construction Worker Travel Plan [REP5-152]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
5.1	Highways	5.2.1	SCC is concerned that the change of minimum car share occupancy target from 1.3 to 2 will be difficult to achieve. Whilst only a target non-compliance would result in additional worker vehicles on the network which may exceed those assumed in the ES and TA. SCC would expect the applicant to evidence such an aspirational target using data from other projects that are being or have been constructed.

Table 6: 7.4 (E) Outline Landscape and Ecological Management Plan [REP5-158]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
6.1	Landscape	Table 1.1 Structure of the Outline LEMP	This lists under Appendix D:7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals (Tracked) (Final Issue B) [REP5-160]. However, this only contains the revised proposals for Tilbury North substation and CSE, and not for the other areas, previously included in 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals (Final Issue A) [APP-325]. SCC considers that this needs to be addressed and a revision C provided at D7 which includes all relevant sites for Appendix D.
6.2	Landscape	Paragraph 2.2.2	The added wording is not very clearly worded. SCC would suggest: <i>Advance works may also take place prior to development consent, where consented under alternative regimes. Any such early works would be controlled under the terms of the relevant planning permission and would not relate to development carried out under the DCO. Any advanced works consented under other regimes, e.g. Town and County Planning Applications, would be agreed and secured through the development control documents as part of the relevant planning applications. Therefore, such works, measures, and commitments are not included within this Outline LEMP to avoid duplication.</i> However, what remains unresolved is the issue of avoidable vegetation losses during pre-commencement works under the DCO consent, which may occur because relevant

			plans are not updated or changes in detailed design are not communicated sufficiently early to the contractor. SCC seeks a mechanism/commitment that requires a dialogue between the contractor and the design lead of the project to communicate prior to any vegetation clearance on site, so that only vegetation that needs to be removed or managed will be affected. SCC considers this necessary in order to achieve, where possible, a reduction in vegetation loss from the Rochdale Envelope approach of reasonable worst-case presented in the DCO submission documents and to avoid unnecessary losses because of works being carried out to outdated plans.
6.3	Landscape	Paragraph 7.5.10	SCC considers it should be made more explicit that the last sentence only refers to Rainbow Wood and Ashen Shaw. SCC would suggest: <i>Management of any replacement ancient woodland compensatory replanting for Rainbow Wood and Ashen Shaw will be undertaken pursuant to the management regime contained in LTC's control documents.</i>
6.4	Landscape	new paragraph 7.6.4	SCC welcomes the new paragraph 7.6.4 but would ask that it states explicitly that the records, as well as the pre-condition surveys, will be made available to the relevant local authorities. SCC would suggest: <i>In accordance with good practice measures, a full record of the condition of hedgerows will be carried out (photographic and descriptive) prior to construction. This record will be available <u>and shared with</u> the relevant local authorities (and other stakeholders) for comparison following reinstatement after the works have been completed, to demonstrate that the standard of reinstatement meets that recorded in the pre-condition survey or as agreed in the Outline LEMP.</i>

6.5	Landscape	New section Woodland Planting Deer and Grey Squirrel Management (paragraph 9.3.10 onwards)	SCC considers that this is still too non-committal (“potential measures include”). The potential measure of deer fencing also ignores the damage that can be caused by rabbits. Deer and rabbit proof fencing is the only way to protect areas selected for natural regeneration, as no planting/re-planting is envisaged and therefore tree guards etc. do not apply.
6.6	Landscape	Paragraph 9.7.2	As stated above Appendix D (Final Issue B) [REP5-160] does not contain all areas. Further, SCC has previously asked that the proposals for Wenham Grove CSE compound be revised, which has not been taken on board by the Applicant. SCC is concerned that post-consent there will not be sufficient flexibility to address the comments SCC have raised and that un-satisfactory proposals will have to be carried forward.
6.7	Landscape	Paragraph 10.1.2	It should be agreed what would constitute a significant amount. SCC considers that a failure rate of 20% or more would be significant.
6.8	Landscape	Aftercare for Woodland, Trees and Hedgerows	SCC maintains that for trees and woodlands a non-flexible five year aftercare period is wholly insufficient. SCC further considers that annual inspection visits with representatives of the relevant local authorities should be accommodated throughout the aftercare period. Herbicide use should always be last resort. This is not clear in all bullet points. Watering only trees with a trunk diameter of 6 cm or more will compromise the majority of planting, which will be smaller, and is therefore considered insufficient. Any removed stakes, guards etc need also be disposed of responsibly. No provisions have been made for aftercare and management for areas of woodland selected for natural regeneration. Further, comments made at D5 in [REP5-270] remain valid.

Table 7: 7.5 (B) Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-162]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
OAMS			
7.1	Archaeology	1.4.8 The archaeological contractor(s) or Archaeological Clerk of Works (ACoW) will develop a tool box talk on the identification and reporting of unexpected archaeological remains during construction works. The illustrated talk will be given by a suitably qualified member of the archaeological contractor(s) staff or ACoW to the Project construction staff. The talk will include that any findings will be immediately reported to the Archaeological Clerk of Works on site who, following initial investigations to establish the validity of any remains, report the findings on the relevant stakeholders as appropriate.	This needs to be amended to state that it is the ACoWs responsibility to develop the toolbox talks, to ensure consistency across the scheme. The ACoW can instruct the archaeological contractor to deliver the toolbox talks. <i>The archaeological contractor(s) or Archaeological Clerk of Works (ACoW) will develop a tool box talk on the identification and reporting of unexpected archaeological remains during construction works. The illustrated talk will be given by a suitably qualified member of the archaeological contractor(s) staff or ACoW to the Project construction staff. The talk will include that any findings will be immediately reported to the Archaeological Clerk of Works on site who, following initial investigations to establish the validity of any remains, report the findings on the relevant stakeholders as appropriate.</i>
7.2	Archaeology	1.9 Table 1.2	This should include the priority areas where design change to the Order Limits means that the revised route has not been evaluated.

7.3	Archaeology	1.7.4 National Grid will appoint an Archaeological Clerk of Works (ACoW) for the Project. The ACoW, working on behalf of National Grid, will be responsible for liaising with the Local Planning Authority Archaeological Advisors to ensure that evaluation and mitigation measures are correctly implemented, monitored, and maintained during the construction phase of the works. This will include monitoring the Archaeological Contractor's work to ensure compliance with the DWSIs and this Outline AMS-OWSI and monitoring the specific construction activities to ensure compliance with all archaeological mitigation requirements, including protection measures, set out in the Outline CoCP (document reference 7.2).	This requires amendments to clarify that the appointed ACoW is for client site archaeological assurance, liaison and compliance monitoring, which is distinct from the archaeological contractor who undertakes the fieldwork. This sentence need to be removed “<i>This will include monitoring the Archaeological Contractor’s work to ensure compliance with the DWSIs and this Outline AMS-OWSI</i>”, as this is the role of the LPAAA on behalf of the discharging authority. This corresponds to 5.2.11 in the OWSI. SCCAS would therefore advise the following amendments to add clarity to the role: <i>National Grid will appoint an Archaeological Clerk of Works (ACoW) for the Project. The ACoW will be a suitably qualified and experienced archaeologist, working on appointed to act on behalf of National Grid; The ACoW The ACoW will be responsible for liaising with the Local Planning Authority Archaeological Advisors and the project team to ensure that evaluation and mitigation measures are correctly implemented, monitored, and maintained during the construction phase of the works. This will include monitoring the Archaeological Contractor’s work to ensure compliance with the DWSIs and this Outline AMS-OWSI and The ACoW shall be responsible for monitoring the specific construction activities to ensure compliance with all archaeological mitigation requirements, including protection measures, set out in the Outline CoCP (document reference 7.2). The ACoW will also advise the project team on archaeological constraints including ensuring that constraints identified through the DWSIs are communicated appropriately and incorporated into project-wide constraints information and will provide toolbox talks or other</i>
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			<u>site briefings where required to inform site personnel of archaeological and historic environment constraints.</u> Question: will the Archaeological Clerk of Works comprise a team of people as it is stated in the Deadline 5 submissions? If this is the case that should be made apparent in the OAMS-OWSI.
7.4	Archaeology	1.7.5 National Grid will appoint an Archaeological Contractor to carry out the archaeological evaluation and mitigation fieldwork. The Archaeological Contractor(s) or National Grid’s Archaeological Advisor [emphasis added] will be responsible for the production of DWSIs for each stage of archaeological investigation. National Grid’s Archaeological Advisor will submit the DWSIs to the appropriate LPAAA for review and approval.	This text has changed since SCCAS last reviewed the pre-submission document. The text reviewed by SCCAS in the pre-submission document stated: “National Grid will appoint an Archaeological Contractor to carry out the archaeological evaluation and mitigation fieldwork. The Archaeological Contractor will be responsible for the production of DWSIs for each stage of archaeological investigation. National Grid’s Archaeological Advisor will submit the DWSIs to the appropriate LPAAA for review and approval.” Although the addition of “<i>or National Grid’s Archaeological Advisor</i>” may appear to be a minor adjustment to the text, it represents a significant change to the OAMS and has implications for the remainder of the OAMS-OWSI. Where the Applicant is appointing the Archaeological Contractor to carry out the fieldwork, it would normally be expected that the contractor prepares the detailed methodology for that work, as they are the party responsible for delivering it. If National Grid’s Archaeological Advisor is to prepare the DWSIs, this raises a number of questions, including whether the Archaeological Contractor has agreed the methodology set out in the DWSIs, whether the contractor can practically deliver the archaeological works, who owns the risk if the fieldwork methodology proves inadequate and whether the

			DWSIs will reflect the contractor's staffing, specialist provision, plant and site recording procedures. This also raises concerns where National Grid's Archaeological Advisor prepares DWSIs prior to the appointment of an Archaeological Contractor. In such circumstances, the DWSIs would not be able to provide any details on staffing, specialist provision, programme, site procedures or practical approach to delivery. This creates a risk that the DWSIs may not fully reflect how the archaeological works will be implemented on site and during post-excavation assessment. Therefore, where National Grid's Archaeological Advisor prepares the DWSIs, the Archaeological Contractor should be required to produce a Contractor's Method Statement (CMS) to confirm compliance with the relevant DWSI. The CMS should set out the contractor's procedures for undertaking the works defined in the DWSI and provide details of the staffing, specialist provision, plant, programme, site procedures and contractor-specific methodologies proposed to deliver the archaeological works. Provision for this must therefore be made in the relevant DWSIs. In such instances, the DWSI should not be considered complete for the purposes of commencing archaeological fieldwork until the CMS has been reviewed and approved by the relevant LPAAA and appended to the DWSI. In effect, where a DWSI prepared by the Applicants Archaeological Advisor cannot provide full contractor details, those details will be provided through the appointed Archaeological Contractor's CMS, which, once approved by the relevant LPAAA, will be appended to the relevant DWSI. It is also not uncommon for more than one Archaeological Contractor to be appointed to deliver archaeological fieldwork and post-excavation work, particularly on large infrastructure schemes. This is acknowledged in
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		the OWSI (para 5.1.6 – 5.1.7). The OAMS should therefore make provision for one or more contractors and clarify how contractor method statements will be secured. SCCAS would therefore recommend the following amendment to provide clarity: <i>National Grid will appoint one or more Archaeological Contractors to carry out the archaeological evaluation and mitigation fieldwork. The appointed Archaeological Contractor(s), or National Grid’s Archaeological Advisor where appropriate will be responsible for the production of DWSIs for each stage of archaeological investigation. Where a DWSI is prepared by National Grid’s Archaeological Advisor including where this occurs prior to the appointment of an Archaeological Contractor the relevant DWSI shall contain provision for the appointed Archaeological Contractor to prepare a Contractor’s Method Statement (CMS). The CMS shall confirm compliance with the DWSI and set out how the works defined in the DWSI will be delivered. The CMS shall include as appropriate details of staffing specialist provision plant programme site procedures and any contractor-specific methodologies and insurance details. National Grid’s Archaeological Advisor will submit the DWSIs to the LPA for approval subject to review by the appropriate LPAAA and where required Historic England for review and approval. Where a CMS is required under the DWSI the CMS shall be submitted to the LPAAA for review and approval. Archaeological fieldwork shall not commence until an approved DWSI and where appropriate CMS is in place.</i> This should also be reflected in paragraphs 5.1.1–5.1.10 of the OWSI. As currently drafted, these paragraphs identify the Archaeological Contractor(s) as responsible for preparing the DWSIs and do not clearly
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			provide for DWSIs to be prepared by the Applicant's Archaeological Advisor. If the OAMS-OWSI is to allow DWSIs to be prepared by either the appointed Archaeological Contractor(s) or the Applicant's Archaeological Advisor, the OWSI should be amended consistently to explain how this will operate in practice. SCCAS notes that the Deadline 5 submitted DWSIs for archaeological mitigation of the priority areas refer to the need for a commissioned Archaeological Contractor to provide a Contractor's Method Statement in relation to the DWSI, as the submitted DWSIs do not contain contractor details, specialist provision, insurance details etc. The OAMS-OWSI should therefore include provision for the production of Contractor Method Statements. In particular, where a DWSI is prepared prior to the appointment of an Archaeological Contractor, or where contractor-specific delivery details are not included in the DWSI, the appointed Archaeological Contractor should be required to prepare a Contractor's Method Statement confirming compliance with the DWSI and setting out how the approved archaeological works will be delivered. Question: Paragraph 1.7.5 states that is National Grid who will be responsible for appointing the archaeological contractor(s). Will the main construction contractor have any responsibility for appointing archaeological contractor(s) for the delivery of post-consent archaeological works?
7.5	Archaeology	2.1.7 Areas of archaeological mitigation will be informed by the significance of archaeological remains indicated by the results of trial trench evaluation. Classes	<i>SCCAS would recommend the following amendment for clarity:</i> <i>"Areas of archaeological mitigation will be informed by the significance of archaeological remains indicated by the results of trial trench evaluation. Classes of archaeological features such as post medieval field boundaries which are recorded on 1st ed OS mapping and sterile pits (where they</i>

		of archaeological features such as post medieval field boundaries which are recorded on 1st ed OS mapping and sterile pits (where they appear in isolation) are unlikely to require further mitigation. In agreement with the LPAAA, any such areas of the Project will be returned to National Grid.	<i>appear in isolation) are unlikely to require further mitigation. In agreement with the LPAAA, any areas not defined for archaeological mitigation will be returned to National Grid.”</i> This clarifies that any areas not requiring mitigation can be released to the developer which will facilitate progress of the development.
7.6	Archaeology	3.1.7 The strategy for each mitigation area, as set out in the DWSIs, will be designed to answer specific research questions to advance knowledge gain, or to ensure the protection of archaeological features where they do not need to be excavated. Not all sites will be fully excavated, as the primary aim of the strategy is to maximise knowledge gain. The mitigation of the Project is not designed to allow recording for recording’s sake?but rather to excavate those sites with intrinsic or group value?which will add to the corpus of knowledge for the region. This approach is not new?and has been used on other major linear projects?such as the A428?the A303 and High Speed 2 (HS2). [emphasis added]	SCCAS have concerns with this addition to the OAMS <i>“The mitigation of the Project is not designed to allow recording for recording’s sake, but rather to excavate those sites with intrinsic or group value, which will add to the corpus of knowledge for the region. This approach is not new, and has been used on other major linear projects, such as the A428, the A303 and High Speed 2 (HS2).”</i> A statement of this nature should not be in a control document and should be removed, as it does not provide a mechanism for the delivery of archaeological mitigation. The OAMS-OWSI should set out how archaeological mitigation will be secured and delivered in response to the development impact. This is not a research project, mitigation for development impact recognises that archaeological remains affected by the development will be damaged or destroyed and will not be available for future investigation. Decisions on levels of sampling for individual features would be made in the relevant DWSIs and reflect the significance of individual features. Evaluation can only identify part of the archaeological resource, therefore the project should anticipate that further archaeological features not indicated by the evaluation and not covered by the initial research

			questions will be exposed within archaeological mitigation areas, and the research questions set out within the DWSIs will need to be revised in the Updated Project Design. Our understanding of major linear projects such as HS2, A428 and A303 is that areas of archaeological mitigation would be targeted to examine areas of archaeological potential indicated by evaluation which advance knowledge gain. This relates to the selection of areas within the development for mitigation, not how the mitigation will be carried out within those areas. Therefore, SCCAS would recommend the following amendment: The strategy for each mitigation area, as set out in the DWSIs, will be designed <u>in accordance with the regional research framework and agenda and national and local guidance and based on the results of archaeological trial trenching, geophysical survey and other information resources.</u> <u>Where archaeological remains will be impacted by the development the mitigation strategy and will aim to provide a full record of any archaeological features, structures and deposits impacted by the development appropriate to the agreed mitigation methodology.</u> <u>Where preservation in situ can be achieved through modification of design or other protective measures the extent of archaeological investigation should be sufficient to characterise and establish suitability for preservation in situ. Such investigation would not normally comprise a full and detailed record of the heritage asset to be preserved.</u>
7.7	Archaeology	4.2.9	This needs to be amended for clarity to say that:

		Temporary crossings would be required over watercourses, streams, and field ditches to maintain the haul roads along the alignment; these would likely consist of temporary bridges or culverts. Where Project related access routes cross smaller watercourses and streams a concrete culvert will be placed into the feature with some potential digging out in the base. This, however, will be minimal and it is concluded that archaeologically significant waterlogged and/or organic-rich sediments would not be impacted by the works. The culvert would be overlaid by crushed stone and the haul road surfaces. All these elements would be removed once no longer required. Further detail is included in ES Appendix 4.2: Watercourse Crossing Details (document reference 6.4.A2).	<i>“Temporary crossings would be required over watercourses, streams, and field ditches to maintain the haul roads along the alignment; these would likely consist of temporary bridges or culverts. Where Project related access routes cross smaller watercourses and streams a concrete culvert will be placed into the feature with some potential digging out in the base. This, however, will be minimal and <u>it is considered unlikely that archaeologically significant waterlogged and/or organic rich deposits would be affected</u> by the works. <u>However, where significant near surface archaeological remains are identified in adjacent trial trenching, mitigation may be required to manage impacts on near surface archaeology.</u> The culvert would be overlaid by crushed stone and the haul road surfaces. All these elements would be removed once no longer required. Further detail is included in ES Appendix 4.2: Watercourse Crossing Details (document reference 6.4.A2).”</i>
7.8	Archaeology	4.6.5 <i>As the construction of the underground cable and working area would require removal of soil there is potential for physical impacts to archaeology and, in some cases, palaeoenvironmental</i>	Our previous comment has not been satisfactorily addressed. Previous comment: SCCAS do not believe this statement is accurate particularly for the river valleys, facilitating measures such as de-watering will have widespread impact on palaeoenvironmental deposits to significant depth. Please speak to Historic England regional Science advisor - Zoe Outram.

		<i>deposits located within these areas. The construction techniques are expected to affect near-surface archaeology with no impacts expected to deeply buried deposits. On the basis of current construction information it is not expected that the static load or vehicle movements within the construction swathe for underground cables would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI.</i>	SCCAS would advise the following amendment: <i>As the construction of the underground cable and working area would require removal of soil there is potential for physical impacts to archaeology and, in some cases, palaeoenvironmental deposits located within these areas. On the basis of current construction information it is not expected that the static load or vehicle movements within the construction swathe for underground cables would generate downward compaction pressures of a great enough magnitude to impact deeply buried archaeological deposits, any such impacts are expected to occur within the depth of archaeological deposits that would be investigated as 'near-surface' features through mitigation measures set out in the relevant DWSI. <u>However, where dewatering is required to facilitate construction, these impacts on deeply buried archaeological and palaeoenvironmental/geoarchaeologically significant deposits must be addressed and appropriately mitigated.</u></i>
7.9	Archaeology	4.6.11 <i>Temporary discharges may be required relating to dewatering and over-pumping in the cable sections, particularly where deeper working is required such as at the trenchless crossing. It is anticipated these would be made to ground, rather than to watercourses. Where this is not practicable in localised areas, any</i>	Is this meant to be in the open cut section? The creation of silt capture pits would have archaeological impact and depending on the scale of the dewatering this may also impact archaeological and palaeoenvironmental sediments by changing the preservation environment and accelerating decomposition of organic and metal artefacts and palaeoenvironmental remains. Therefore, SCCAS recommends the addition of the following statement: <u>Following finalisation of designs and construction methodologies a programme of appropriate archaeological and palaeoenvironmental mitigation for these impacts will be designed and included in DWSIs.</u>

		<i>discharge to surface water would be made in compliance with relevant consents.</i>	
7.10	Archaeology	4.6.12 <i>Some trenchless methods require use of a drilling slurry such as bentonite to support the surrounding ground while the drilling/boring commences. The use of pressurised liquids presents a risk of environmental contamination, either through loss of fluids into permeable strata or breakout of fluids at the surface. Adequate mitigation of these risks requires detailed ground investigation and further design of the trenchless crossings – further assessment of this is presented in ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9). Space for access arrangements from the public highway to the proposed trenchless crossing locations is included within the Order Limits in the event of a pollution incident during construction.</i>	Reference to “<i>ES Chapter 9: Contaminated Land, Geology and Hydrogeology (document reference 6.9)</i>” does not assess impacts to archaeology or geoarchaeologically/palaeoenvironmental significant deposits and therefore should be removed from this paragraph.
7.11	Archaeology	4.6.13 The construction methods for trenchless installation of underground cable are not expected to affect near surface	This paragraph is incorrect and doesn't fit with 4.6.15. Sufficient information needs to be obtained to establish whether drilling clay break out will be a significant risk of the drilling activity and therefore whether

	archaeology in normal working, with the exception of the drive and reception locations. In these locations impacts to both near surface and deeply buried archaeological deposits could occur, due to construction passing through the full stratigraphy to reach the required depth. Within the trenchless crossing there is the possibility of a drilling slurry breakout. However, this is considered to be unlikely with the proposed mitigation of these risks as specified by GH11 and GH12 of 7.2 Code of Construction Practice, and consequently archaeological mitigation in advance is not proposed. The trenchless crossing locations are subject to geophysical survey and archaeological trial trench evaluation to ensure the character and extent of any archaeology in these locations is understood. This would inform any potential mitigation requirements in the event of a drilling slurry breakout, which would be undertaken in accordance with the terms set out in a DWSI. Where it is determined that preservation in situ is achievable, the Preservation In Situ Plan included in the DWSI will include provision and procedures for monitoring, reporting,	preservation in situ of near surface archaeology can or cannot be achieved. Archaeological mitigation would be included for areas outside of the drilling pits where the drill depth has not reached sufficient depth to allow for preservation in situ. The areas above the trenchless crossings should not be treated as exclusion zones to prohibit the future investigation of archaeological remains that may be preserved in situ. As currently written the paragraph states that trenchless installation is not expected to affect near-surface archaeology in normal working, except at drive and reception locations, and that archaeological mitigation in advance is therefore not proposed. However, since the final design and trenchless crossing method has not been finalised, this claim is unsupported. This paragraph should be amended to highlight that further archaeological and geological assessment would be required to determine the exact trenchless crossing method and what archaeological mitigation required. GH11 and GH12 provide relevant controls in relation to hydrogeological risk and drilling-fluid breakout, but they do not in themselves secure an adequate archaeological or palaeoenvironmental mitigation strategy. The reference in GH11 to assessing the consequences for sensitive archaeological deposits is welcomed, but further detail is required regarding how such deposits will be identified, assessed and mitigated. GH12 addresses engineering measures such as monitoring, containment, removal, sealing and remediation, but these measures may themselves involve ground disturbance with the potential to affect archaeological deposits. Therefore, GH12 is unsuitable to be applied to an area of archaeological sensitivity and a specific methodology for managing
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		emergency response, archaeological investigation and remediation measures in the event of slurry breakout, frac-out or other unexpected ground disturbance.	bentonite/drilling clay break out and clean up must be developed and included in the DWSI and reference to GH12 should be removed from OAMS-OWSI. Therefore, paragraph 4.6.13 should be amended to state it is currently unknown what level of archaeological mitigation would be required for the trenchless crossing area as final designs have not been formalised. A detailed strategy for further archaeological and geoarchaeological assessment will be developed post-consent.
7.12	Archaeology	4.6.14 <i>The trenchless construction techniques have potential to affect deeply buried deposits depending on the potential where identified by geoarchaeological monitoring of the ground investigation works in these locations. In most cases it is assessed that the depth is great enough to avoid impacts to even deeply buried deposits, however, where the available data suggests the potential for impacts on deeply buried deposits, a programme of geoarchaeological and palaeoenvironmental investigation will be required to establish any mitigation measures that may be required.</i>	This statement is incorrect and doesn't fit with paragraph 4.6.15. Drilling through unstable, waterlogged deposits containing archaeological and palaeoenvironmental remains, including peat, is likely to result in significant impact. This may occur through the introduction of drilling clay or drilling fluids into the deposits, particularly where sub-surface breakout occurs. Such impacts have the potential to affect local hydrology, compromise deposit integrity, and limit the scope for future scientific archaeological and palaeoenvironmental analysis. Consequently, preservation in situ would not be achieved. In light of the likely effects paragraph 4.6.14 should be amended to state that for these locations, an appropriate programme of palaeoenvironmental and geoarchaeological investigation will be required to provide a robust record of the affected deposits, as mitigation for the anticipated impacts. The precise methodology should be informed by the final crossing design, but should include, as a minimum, transects of sleeved cores across the area of impact to recover full deposit profiles. Additional techniques, including trenching and column sampling, should also be retained as potential methods, to be applied where appropriate based on the final design, ground conditions, and archaeological potential.

			SCCAS will provide the applicant examples of methodologies for managing break-outs in archaeologically sensitive areas. SCCAS would recommend the following amendment to add clarity: <i>The trenchless construction techniques have potential to affect deeply buried deposits depending on the potential, where identified by geoarchaeological monitoring of the ground investigation works in these locations. In most cases it is assessed that the depth is great enough to avoid impacts to even deeply buried deposits, however, <u>Where the available data from geoarchaeological monitoring of the ground investigation works</u> suggests the potential for impacts on deeply buried deposits, a programme of geoarchaeological and palaeoenvironmental investigation will be required to establish any mitigation measures that may be required.</i>
7.13	Archaeology	4.6.15 <i>Currently, the technique(s) to be employed are unknown but will be confirmed at the detailed design stage. When confirmed, the areas of trenchless crossing within the Order Limits resulting in below ground impacts will be reviewed for potential impacts on near-surface archaeological remains and, where deemed appropriate based on borehole data and information on superficial geology held by the British Geological Survey, for potential impacts on deeper deposits of geoarchaeological and</i>	There appears to be a continuity issue between paragraph 4.6.15 and paragraphs 4.6.13 and 4.6.14. Paragraph 4.6.15 indicates that the trenchless techniques are not yet confirmed and that potential impacts will be reviewed at detailed design stage. Paragraphs 4.6.13 and 4.6.14 should therefore be amended, as detailed above, to ensure they reflect this staged approach and do not pre-empt the outcome of archaeological and geological assessment. The precise archaeological, palaeoenvironmental and geoarchaeological methodology for the river crossing should be informed by the final crossing design, but should include, as a minimum, transects of sleeved cores across the area of impact to recover full deposit profiles. Additional techniques, including trenching and column sampling, should also be retained as potential methods, to be applied where appropriate based on the final design, ground conditions, and archaeological potential.

		<i>palaeoenvironmental significance. The scope of the archaeological evaluation work in these areas will be set out in the relevant DWSIs. The scope of the evaluation set out in the DWSIs will be formulated in discussion with the relevant LPAAA and, in the cases where geoarchaeological and palaeoenvironmental potential is identified, the Historic England regional science advisor.</i>	<i>This requires amendments for clarity:</i> <i>Currently, the technique(s) to be employed are unknown but will be confirmed at the detailed design stage. When confirmed, the areas of trenchless crossing within the Order Limits resulting in below ground impacts will be reviewed with the relevant LPAAA for potential impacts on near-surface archaeological remains and, where deemed appropriate based on borehole data and information on superficial geology held by the British Geological Survey, for potential impacts on deeper deposits of geoarchaeological and palaeoenvironmental significance. The scope of the evaluation and mitigation will be set out in the DWSIs and will be agreed will be formulated in discussion with the relevant LPAAA and where appropriate, in the cases where geoarchaeological and palaeoenvironmental potential is identified; the Historic England regional science advisor.</i>
7.14	Archaeology	4.7.2 <i>Where pylons are proposed to be removed, it may be necessary to establish a 60 m x 60 m working area. Typically, this area would not be stoned; instead, if ground conditions are poor, trackway may be used. Removal of pylons would involve removing the conductors by lowering cut sections to the ground, then lowering the insulators and fittings to the ground. Where a pylon is in a clear area and it is safe to do so, the pylon would be removed by ‘felling’ the whole structure.</i>	Where pylon felling is involved, this is likely to have significant impact to archaeological remains. Therefore, the final designed felling zone should be archaeologically investigated through trial trenching to assess the impact and whether archaeological mitigation is required. Where temporary trackway is proposed, it may reduce direct rutting but may still result in soil compaction, particularly in wet ground conditions or where heavy plant is used. Any subsequent soil decompaction, ripping, subsoiling or remediation works may themselves be intrusive and damaging to archaeological heritage assets. Accordingly, areas requiring decompaction should be assessed archaeologically in advance of any soil decompaction/remediation works taking place.

		<i>Alternatively, a mobile crane would be used to remove the structure in sections which would then be lowered to the ground. Once dismantled, the pylon steelwork would typically be broken up on site then removed. The reinforced concrete foundation would then be removed typically to a depth of 1.2 m below ground level. The excavation would then be backfilled and the ground reinstated and any waste removed from site to a suitable licensed waste management facility.</i>	
OWSI			
7.15	Archaeology	5.1.1 <i>Should there be any outstanding areas requiring evaluation due to previous issues, such as with land access, the work would be carried out post-consent under the terms of any existing SSWSI that was agreed with the LPAAAs prior to the grant of the DCO. If a SSWSI does not exist for the relevant area a separate DWSIs would be prepared setting out suitable evaluation measures. DWSIs would be prepared setting</i>	This paragraph 5.1.1 has substantially changed since the last time SCCAS reviewed this document, therefore SCCAS have the following comments and there needs to be the addition of The Applicants Archaeological Advisor to produce DWSIs. As it proposed in the OAMS paragraph 1.7.5. As set out in our comments on paragraph 1.7.5 in the OAMS, there is a need for the addition of a paragraph into section 5.1 of the OWSI which states: <u>Where a DWSI is produced by the Applicants Archaeological Advisor the requirement for a Archaeological Contractors Method Statement will be included in the DWSI along with a mechanism for the relevant LPAAA to review and approve the Archaeological Contractors Method Statement.</u>

	out in detail specific mitigation measures for the detailed design of the Project, informed by the strategy described in this Outline AMS-OWSI. Existing models and new datasets collected during fieldwork would inform design of mitigation works in the DWSIs during the investigations. These DWSIs would be prepared by the relevant Archaeological Contractor(s) in consultation with National Grid, the relevant Local Planning Authority Archaeological Advisors and Historic England. The DWSIs would be approved by the relevant Local Planning Authority (through the relevant Local Planning Authority Archaeological Advisors) and shared with, if relevant, Historic England, prior to works commencing in the area to which each DWSI applies. A period of 28 days for review and agreement of DWSIs will be included in the programme.	SCCAS would also advise the following amendment for 5.1.1: Should there be any outstanding areas requiring evaluation due to previous issues, such as with land access, the work would be carried out post-consent under the terms of any existing SSWSI that was agreed with the LPAAAs prior to the grant of the DCO. If a SSWSI does not exist for the relevant area a separate DWSIs would be prepared setting out suitable evaluation measures. DWSIs would will be prepared setting out in detail specific evaluation and mitigation measures for the targeting impacts defined in the detailed final design of the Project. This will be informed by the strategy described in this Outline AMS-OWSI. • <u>DWSIs for trial trenching will target areas of project impact? including haul roads? SuDs ponds? pylon bases? compounds? working areas? laydown areas and any area which will be subject to significant ground disturbance.</u> • Existing models and new datasets collected during fieldwork The results of evaluation (geophysics and trial trenching) would will inform the design of mitigation works in the subsequent mitigation DWSIs during the investigations. These DWSIs would be prepared by the relevant Archaeological Contractor(s), in consultation with National Grid, the relevant Local Planning Authority Archaeological Advisors and Historic England. The DWSIs would be approved by the relevant Local Planning Authority (through the relevant Local Planning Authority Archaeological Advisors) and shared with, if relevant, Historic England, prior to works commencing in the area to which each DWSI applies. A period of 28 days for review and agreement of DWSIs will be included in the programme. <u>National Grid will appoint one or more Archaeological Contractors to carry out the archaeological evaluation and mitigation fieldwork. The</u>
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			<u>appointed Archaeological Contractor(s), or National Grid's Archaeological Advisor where appropriate, will be responsible for the production of DWSIs for each stage of archaeological investigation. Where a DWSI is prepared by National Grid's Archaeological Advisor, including where this occurs prior to the appointment of an Archaeological Contractor, the relevant DWSI shall contain provision for the appointed Archaeological Contractor to prepare a Contractor's Method Statement (CMS). The CMS shall confirm compliance with the DWSI and set out how the works defined in the DWSI will be delivered. The CMS shall include, as appropriate, details of staffing, specialist provision, plant, programme, site procedures and any contractor-specific methodologies and insurance details. National Grid's Archaeological Advisor will submit the DWSIs to the LPA for approval subject to review by the appropriate LPAAA and where required Historic England. Where a CMS is required under the DWSI, the CMS shall be submitted to the LPAAA for review and approval. Archaeological fieldwork shall not commence until an approved DWSI, and where appropriate CMS, is in place.</u> <u>Any areas of evaluation within the priority areas that have not been completed</u> such as with land access, the work would be carried out post-consent under the terms of any existing SSWSI that was agreed with the LPAAAs prior to the grant of the DCO. If a SSWSI does not exist for the relevant area a separate DWSIs would be prepared setting out suitable evaluation measures as per the above. This provides clarity for the existing outstanding areas of archaeological evaluation within the priority sections and for the remaining evaluation required on the overall project, and brings DWSI production in line with 1.7.5 of the OAMS.
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7.16	Archaeology	5.1.3 <i>DWSIs would be prepared for specific geographic areas of works, such as a section of overhead line construction, or for types of construction works, such as temporary construction compounds. Separate DWSIs will, however, be prepared for each archaeological phase, e.g. evaluation and mitigation. The approach would depend on the requirements of the construction programme and the nature of archaeology to be mitigated.</i>	SCCAS would recommend the following amendment to add clarity and consistency: <u>Separate</u> DWSIs would be prepared for specific geographic areas of works, such as a section of overhead line construction, or for types of construction works, such as temporary construction compounds-2and for each archaeological phase e.g. evaluation and mitigation. Separate DWSIs will, however, be prepared for each archaeological phase, e.g. evaluation and mitigation. The approach would depend on the requirements will be informed by the potential impacts of the construction programme and the nature of archaeology to be mitigated.
7.17	Archaeology	5.1.5 <i>The Archaeological Clerk of Works (ACoW) and/or the Archaeological Contractor(s) would produce archaeological constraints maps and give Tool Box Talks to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under the Outline AMS-OWSI, DWSI and generally, to ensure that these are put in place and complied with.</i>	This amendment is required due to changes in the OAMS. To clearly define the role and responsibilities of the Archaeological Clerk of Works (ACoW) for the project. This is to ensure consistency with the role within the OAMS-OWSI (see requested amendment to para 1.7.4 of the OAMS) and the Outline Code of Construction Practice (OCoCP) and avoid ambiguity over the ACoW's remit during construction. <u>The Archaeological Clerk of Works (ACoW) will advise the project team to ensure that the constraints identified in the approved DWSIs are incorporated into the project-wide constraints mapping. The ACoW shall prepare toolbox talks or other briefings to site personnel so that archaeological and historic environment constraints are understood before and during construction works.</u> <i>_and/or the Archaeological Contractor(s) would produce archaeological constraints maps and give Tool Box Talks to inform all site personnel of the</i>

			archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under the Outline AMS-OWSI, DWSI and generally, to ensure that these are put in place and complied with.
7.18	Archaeology	5.2.19 <i>Sites that have been completed would be subject to a formal signing off procedure, in order to allow the mitigation areas to be released to the construction team. The Archaeological Contractor(s) would submit a completion statement to the ACoW. This statement will include a final site plan, showing locations of archaeological features and interventions (in both PDF and Shapefile format). The ACoW would submit the accepted completion statement to National Grid and the appropriate Local Planning Authority Archaeological Advisor for confirmation (in consultation with Historic England, where required) that the relevant works have been completed in compliance with the relevant DWSIs.</i>	This introduces the concept of an “accepted completion statement” by the ACoW before LPAAA confirmation that the completion statement is appropriate for sign off. The LPAAA is the monitoring authority on behalf of the discharging authorities with regards to compliance to the DCO requirement. While SCCAS support the idea that the ACoW will endeavour to ensure works are completed to an appropriate standard, the final decision on fieldwork completion remains with the LPAAA. This paragraph should be amended to the following, as it can only be considered accepted following LPAAA approval: <i>Sites that have been completed would be subject to a formal signing off procedure, in order to allow the mitigation areas to be released to the construction team. The Archaeological Contractor(s) would submit a completion statement to the ACoW. This statement will include a final site plan, showing locations of archaeological features and interventions (in both PDF and Shapefile format). The ACoW would submit the accepted completion statement to National Grid and the appropriate Local Planning Authority Archaeological Advisor for confirmation (in consultation with National Grid and Historic England, where required) that the relevant works have been completed in compliance with the relevant DWSIs.</i>
7.19	Archaeology	5.2.21 <i>Dispute Resolution</i>	SCCAS have never encountered this on previous NSIPs and are unsure about this matter. This should be discussed by the legal teams to

		<i>In the event of disagreement between the Archaeological Contractor(s), the ACoW, the relevant Local Planning Authority Archaeological Advisor and/or National Grid on the progress, strategy or completion of work the parties must use their reasonable endeavours to secure the amicable resolution of any dispute or difference arising between them in accordance with the following provisions:</i> <i>• A senior representative(s) of each party shall meet as soon as reasonably practicable in order to identify a means through which matters in dispute may be resolved.</i> <i>• If the matter is not resolved at that level within 20 business days of either party requesting such a meeting (or such longer period as may be agreed between the parties) then the provisions of article 62 (arbitration) of the Development Consent Order (document reference 3.1) will apply.</i>	determine appropriateness of the use of Article 62 with regards to works secured by requirements.
7.20	Archaeology	5.3.2 <i>Heritage assets and archaeological sites that will be protected by a combination of protection measures that will be put in</i>	Our previous comment still stands requiring provision for a Historic Environment Management Plan (HEMP). <i>“Heritage assets and archaeological sites that will be protected by a combination of protection measures that will be put in place at the start of</i>

		<i>place at the start of the construction programme to ensure their long-term survival will be identified in the DWSIs.</i>	<i>the construction programme to ensure their long-term survival will be identified in the DWSIs <u>and Historic Environment Management Plans (HEMPs).</u></i> A primary reason why the DWSI is not an appropriate mechanism for securing preservation in situ is that archaeological heritage assets may be identified during the mitigation phase which were not anticipated on the basis of the evaluation results, but which nevertheless require, or are considered economically desirable for, preservation in situ. A HEMP is therefore the more appropriate mechanism for securing and managing such preservation measures. A single HEMP could be prepared for the whole scheme, setting out the mechanisms and procedures for preservation in situ. Any sites, deposits or features subsequently identified as requiring preservation in situ could then be added to, and managed through, that document.
7.21	Archaeology	5.3.4 <i>For each site or heritage asset, protection measures will be described in a DWSI prepared in consultation with the relevant Local Planning Authority Archaeological Advisors and, if appropriate, Historic England. This will also include arrangements for regular site inspections by the ACoW, maintenance requirements, and ‘Tool-Box Talks’ to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required</i>	Please see comment 5.3.2 above. Our previous comment still stands: <i>“For each site or heritage asset, protection measures will be described in a DWSI <u>and Historic Environment Management Plan (HEMP)</u> prepared in consultation with the relevant Local Planning Authority Archaeological Advisors and, if appropriate, Historic England. This will also include arrangements for regular site inspections by the ACoW, maintenance requirements, and ‘Tool-Box Talks’ to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under this Outline AMS-OWSI and generally, to ensure that these are put in place and complied with, <u>preservation in situ sites will also be recorded on project live constraints mapping.</u> New sites may be added to the number</i>

		<i>and their obligations under this Outline AMS-OWSI and generally, to ensure that these are put in place and complied with. New sites may be added to the number of sites for preservation of archaeological remains, or existing sites may be adjusted.</i>	<i>of sites for preservation of archaeological remains, or existing sites may be adjusted.”</i> <i>“New sites may be added to the number of sites for preservation of archaeological remains, or existing sites may be adjusted.”</i> This is what the HEMP would be appropriate for as the DWSI is not the appropriate mechanism for preservation in situ. The DWSI can point to the site wide HEMP, where any new sites identified for preservation in situ can be appended to.
7.22	Archaeology	<i>The methodology used to allow for the preservation of archaeological evidence is as follows:</i> <i>• A layer of 10 mm pea shingle is used to fill in any gaps or undulations in the surface of the archaeological remains to a depth of 500 mm above the highest level of the archaeological remains. This ensures that any archaeological features are fully infilled. This is pushed over the remains using a D3 low ground pressure machine.</i> <i>• A layer of permeable geotextile of sufficient quality is laid over the shingle by hand where suitable (geotextile layers will only be used where it is necessary to prevent intermixing of dissimilar soil layers).</i>	his paragraph is incorrect, as Historic England’s 2024 Appendix 5 does not prescribe a universal methodology requiring 10 mm pea shingle or a 500 mm cover depth. Instead, the guidance states that the most appropriate reburial material is usually the material excavated from the site. Where additional material is required, it should be selected on a site-specific basis and must meet appropriate criteria, including capillarity, chemical compatibility, compactability, intimate physical contact with the remains, avoidance of mechanical damage, no release of harmful material, and no significant effect on soil or water chemistry. Historic England guidance also does not specifically endorse the use of a D3 low ground pressure machine. Rather than prescribing a particular item of plant or a standard method, the methodology should be informed by the results of archaeological investigation and by a site-specific assessment of whether preservation by reburial is appropriate. This assessment should then inform the design of an appropriate reburial strategy, including the method of placing and removing protective material. Historic England’s 2024 Appendix 5 further states that the use of geosynthetics should be reviewed carefully and that, although advice is

		<i>Above the fill and geotextile layer (if appropriate), normal earthwork construction then proceeds.</i>	provided on scenarios where they may be appropriate, geosynthetics are generally not needed. SCCAS would therefore recommend the removal of 5.3.9 and 5.3.10 and should be replaced with a paragraph stating that: <u>Provision for reburial where appropriate will follow Historic England (2024 appendix 5) guidance.</u> This is appropriate for the OAMS-OWSI as appropriate on-site assessment will need to be undertaken to inform reburial of archaeological heritage assets, where it is achievable.
7.23	Archaeology	5.3.11 <i>The ACoW will give Tool-Box Talks to inform all site personnel of the archaeological and Historic Environment constraints on site, the protection measures that are required and their obligations under the DWSI, and generally to ensure that these are put in place and complied with. Following construction, the protective fill material will be removed by the Main Works Contractor(s), under supervision by the Archaeological Contractor(s), leaving the sites in their original condition.</i>	Temporary burial, construction loading, plant movement, fill placement and subsequent removal all carry potential risks. Historic England's approach is to assess and manage those risks through a site-specific reburial strategy, rather than to assume that there will be no change to the archaeological remains or their preservation environment. SCCAS would also highlight that the removal of protective fill material by the Main Works Contractor has the potential to cause damage if not undertaken under appropriate archaeological control and in accordance with an agreed site-specific preservation methodology. This is a further reason why SCCAS would recommend that the use of imported material and geotextile/geosynthetic membranes should not be assumed as a default approach. This is a further reason why SCCAS would recommend that no imported material and no membrane is used so that the site is returned to its original state immediately following reburial. Please also note that where pea shingle is used as a protective measure over topsoil, any pea shingle compressed into the topsoil, together with fragments of damaged geotextile or membrane, could be considered soil

			contamination under the Soil Management Plan. This may require remediation works, potentially including a topsoil strip, which would itself have archaeological impacts and would not provide preservation in situ. Therefore, the paragraph should be amended to reflect Historic England's guidance. The methodology should be based on the results of archaeological investigation, an assessment of the significance and condition of the remains, and a site-specific threats and risks assessment. Imported material, geotextiles or other geosynthetics should only be used where their use is specifically justified by the site-specific reburial design, rather than being included as a standard or default protective measure.
7.24	Archaeology	5.3.13 <i>The location and type of fencing for each site for preservation of archaeological remains will be set out in the DWSI (it may be helpful for the Archaeological Contractor(s) to combine various sites into a single DWSI). It will also set out whether any preliminary archaeological investigative work is required (before or during the installation or removal process). Requirements for archaeological investigation will be contained within the DWSIs.</i>	SCCAS would recommend the following the amendment: <i>The location and type of fencing for each site for preservation of archaeological remains will be set out in the DWSI (it may be helpful for the Archaeological Contractor(s) to combine various sites into a single DWSI), <u>and the Historic Environment Management Plan (HEMP).</u> It will also set out whether any preliminary archaeological investigative work is required (before or during the installation or removal process). Requirements for archaeological investigation will be contained within the DWSIs <u>and the HEMP.</u></i>
7.25	Archaeology	5.3.39 <i>At or before the pre-commencement stage or relevant construction activity, and</i>	The OWSI is the control document for post-consent archaeological works and should set out the process by which any outstanding archaeological investigation, evaluation and mitigation will be delivered. Land access

		<i>assuming favourable ground conditions and granted access, additional trial trenching will be carried out undertaken in areas of Project impact that have not previously been trial trenched. The purpose of the archaeological trial trenching will be to determine the presence/absence, extent, DWSIs for mitigation, if required.</i> <i>character, condition and significance of the remains in order to inform</i>	should be capable of being secured through the DCO powers, where required and delays or programming constraints resulting from unsuitable ground conditions should be factored into the project delivery timetable. While ground conditions may affect the timing, sequencing or detailed methodology of trial trenching, they should not be presented as a reason why archaeological trial trenching cannot be undertaken. SCCAS therefore advises that references to land access and unsuitable ground conditions as factors preventing archaeological trial trenching should be removed. These matters are project delivery and programming considerations, not justification for omitting archaeological trial trenching where it is otherwise required to inform the archaeological mitigation. SCCAS would therefore recommended the following amendment: <i>“At or before the pre-commencement stage or relevant construction activity, and assuming favourable ground conditions and granted access, additional trial trenching will be undertaken in areas of Project impact that have not previously been trial trenched. The purpose of the archaeological trial trenching will be to determine the presence/absence, extent, character, condition and significance of the remains in order to inform DWSIs for mitigation, if required.”</i>
7.26	Archaeology	5.3.45 <i>Sites that require detailed archaeological excavation will be identified through a programme of archaeological evaluation and defined in DWSIs for mitigation.</i> <i>Mitigation areas will be designed to extend 10m beyond the extent of known assets</i>	The extent of mitigation should not be determined solely by a fixed 10m or 20m buffer from known assets identified through geophysical survey and/or trial trenching. Is too fixed and implies that mitigation extents are predetermined, rather than being responsive to what is actually found during the archaeological evaluation. Instead, mitigation areas should be defined through the relevant DWSIs, taking account of the character, extent, significance, preservation and

		<i>(through either or both geophysical survey and archaeological trial trenching), unless the assets comprise structural remains or funerary activity, in which case the mitigation area will extend 20 m beyond the known extent of such remains. The mitigation areas will, however, be constrained by the area of Project impact or the Order Limits, whichever is smaller.</i>	archaeological potential for further, yet to be identified archaeological remains within the evaluated areas. The proposed approach should include contingency for the extension of mitigation areas where significant archaeological remains are identified during stripping or excavation. While provision appears to be made for this in relation to human remains at paragraph 5.3.111, equivalent provision should also be set out here for other classes of significant archaeological remains. Significant archaeological remains could include (but not limited to): - Pit groups or clusters - structural remains - burials (inhumation/cremation) - industrial features - flint scatters or lithic concentrations - settlement related features - etc.,. The OWSI should therefore allow mitigation areas to be extended, where justified, within the limits of Project impact and/or the Order Limits. This would ensure that mitigation is proportionate to the archaeological significance of the remains encountered, rather than being constrained by a blanket buffer approach. SCCAS would therefore advise the following amendment: <u>5.3.45 Mitigation areas will be defined in the relevant DWSIs following archaeological evaluation having regard to the extent, character, significance and archaeological potential of the remains identified.</u>
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			And another paragraph should be added to detail limits of extensions: <u>Where significant archaeological remains are identified during stripping/excavation or other mitigation works provision will be made in the DWSIs for the mitigation area to be extended where necessary and practicable within the area of Project impact or Order Limits whichever is smaller. Any such extension will be agreed with the relevant LPAAA. As a minimum this will comprise a 20m extension for funerary and structural remains and a 10m extension for all other remains unless otherwise agreed with the relevant LPAAA. This is to establish a 20m or 10m archaeological sterile area from the last archaeological feature.</u>
7.27	Archaeology	5.3.46 <i>Sites designated for detailed archaeological excavation will be stripped with mechanical plant as set out in the DWSI. The sequencing of stripping, location of soil storage areas and arrangements for backfilling, together with other relevant logistical considerations, will be set out in the DWSI.</i>	SCCAS would recommend the following amendment for clarity: <i>Sites designated for detailed archaeological excavation will be stripped with <u>back acting mechanical plant of a suitable size fitted with a toothless ditching bucket no smaller than 1.8m wide</u> mechanical plant as set out in the DWSI. The sequencing of stripping, location of soil storage areas and arrangements for backfilling, together with other relevant logistical considerations, will be set out in the DWSI.</i> NB. The use of dozers and graders is not appropriate for archaeological site stripping.
7.28	Archaeology	5.3.47 <i>For sites where machine stripping is required, topsoil, subsoil and other confirmed non-archaeological</i>	SCCAS would like to point out that the Research Framework can inform why an area is being stripped, what initial questions the mitigation should address, and how archaeological remains should be investigated, sampled and recorded.

		<i>overburden will be removed under the supervision of the relevant Archaeological Contractor(s) to the first archaeological horizon. The relevant horizon will be informed by the evaluation results, the Research Framework, and the aims and objectives described in the DWSIs.</i>	However, it does not inform the physical depth to which a mitigation area should be machine stripped, except in circumstances where deep modern made ground exists. The Research Framework might influence whether the mitigation strategy should be especially alert to, for example, palaeoenvironmental deposits, prehistoric land surfaces, alluvial sequences or deeply buried horizons. However, it does not itself determine that an area should be stripped to a prescribed depth as the correct archaeological horizon is site-specific and may vary across the mitigation area. This wording is also inconsistent with paragraph 5.3.50, where the DWSIs appropriately define the initial research questions. SCCAS therefore recommends the following amendment to provide clarity: <i>“For sites where machine stripping is required, topsoil, subsoil and other confirmed non-archaeological overburden will be removed under the supervision of the relevant Archaeological Contractor(s) to the first archaeological horizon. The relevant horizon will be informed by the evaluation results, the Research Framework, and the aims and objectives described in the DWSIs.”</i>
7.29	Archaeology	5.3.54 <i>The Archaeological Contractor(s) shall not excavate any area beyond those identified within the relevant DWSI, unless archaeological features revealed within the excavation area continue outside of the area and are likely to be subject to construction impact, then the excavation</i>	SCCAS recommend the following amendment for consistency with 5.3.45 and 5.3.111 and to add clarity to this section: <i>The Archaeological Contractor(s) shall not excavate any area beyond those identified within the relevant DWSI, unless significant archaeological remains are indicated to continue beyond the excavation area features revealed within the excavation area continue outside of the area and are likely to be subject to construction impact, then the excavation area may need to be extended to fulfil the requirements of the DCO and National</i>

		area may need to be extended to fulfil the requirements of the DCO and National Policy Statement (NPS) (EN-1) (DESNZ, 2024). This will only be undertaken following consultation with National Grid, the ACoW and the Main Works Contractor(s), in consultation with the relevant Local Planning Authority Archaeological Advisors and where appropriate Historic England.	Policy Statement (NPS) (EN-1) (DESNZ, 2024). This will only be undertaken following consultation with National Grid, the ACoW and the Main Works Contractor(s), in consultation with the relevant Local Planning Authority Archaeological Advisors and where appropriate Historic England. <u>As a minimum this will comprise a 20m extension for funerary and structural remains and a 10m extension for all other remains unless otherwise agreed with the relevant LPAAA. This is to establish a 20m or 10m archaeological sterile area from the last archaeological feature.</u>
7.30	Archaeology	5.3.126 – 5.3.141 <i>Geoarchaeological and palaeoenvironmental investigation</i>	SCCAS will defer comments on this section to Essex and Historic England.
7.31	Archaeology	5.3.109 The DWSIs will describe a detailed strategy for the investigation, treatment, recovery and assessment/analysis of human remains (neonate/young infants, inhumations, cremations, disarticulated/charnel remains) which will be developed by the human remains specialist. The DWSIs will also include provision for the identification, excavation, recording and sampling of body stains/shadows, coffin remains and coffin stains/shadows where they exist. Any	In light of the fact that there are active discussions as to whether the inspectorate will remove Article 23 from the DCO, as this has happened on other NSIP project (e.g. SeaLINK). SCCAS recommend that the line “Any investigation of human remains must comply with Article 23 of the Draft DCO (document reference 3.1).” is replaced with: “Any investigation of human remains must comply with <u>all legal requirements</u> Article 23 of the Draft DCO (document reference 3.1).” As this would cover reversion to the burial act.

		investigation of human remains must comply with Article 23 of the Draft DCO (document reference 3.1). The investigation of human remains will be undertaken in accordance with national and local guidelines (Historic England, 2018; Advisory Panel on the Archaeology of Burials in England, 2017; Historic England, 2023; McKinley and Roberts, 1993; and McKinley and Brickley, 2004; SCCAS 2026c), under the guidance of the human remains specialist. An appropriate methodology for the recovery of cremated human remains will be developed and detailed in the DWSI. At the post-excavation assessment (PXA) stage the Archaeological Contractor(s) will consider the application of modern scientific studies, such as DNA work and isotope analysis. It is expected where other dating cannot be obtained for this material that C-14 will be applied. A programme of full assessment of human remains will be detailed in the Updated Project Design (UPD), which will be approved by the relevant LPAAA and where required Historic England.	
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7.32	Archaeology	Appendix B Archaeological Mitigation areas	SCCAS notes the applicant’s clarification that the mitigation areas identified in the OAMS-OWSI are based on the current project design, the results of Priority Area geophysical survey and trial trench evaluation, and other known archaeological information. SCCAS also notes that the applicant proposes to review and amend these areas, where required, through consultation with the relevant LPAAA, and that the detailed mitigation methodology would be set out in the relevant DWSI. However, SCCAS remains concerned that the presentation of these areas as “mitigation areas” within the OAMS-OWSI gives them a level of certainty that is not appropriate at this stage. The final agreed mitigation areas will be presented in the relevant DWSI. SCCAS therefore recommends that Appendix B be retitled as “Indicative Priority Area Archaeological Mitigation Areas”. SCCAS is still in discussion with the applicant about the extent of the indicative priority area mitigation areas, once these are agreed, this table should be updated to reflect this. The final extent, scope and methodology of archaeological mitigation should be defined within the relevant DWSI following completion, reporting and review of the archaeological evaluation and in consultation with the relevant LPAAA.
7.33	Archaeology		SCCAS welcomes the inclusion of Figure 1, however, amendments are required before it can be accepted. The OAMS-OWSI currently defines the “Phase 2 Archaeological Trial Trenching Areas – Not Started” too narrowly. The areas shown in green in the plans do not reflect the full extent of project impacts with the potential to affect buried archaeological heritage assets, including temporary SuDS

			ponds. This also risks constraining necessary post-approval design variations. SCCAS therefore recommends that the full red line order limit is identified as the “Phase 2 Archaeological Trial Trenching Areas – Not Started”. The key should include a clear clarification that archaeological evaluation will only be required in relation to areas of project impact. The specific areas to be evaluated during Phase 2 should then be defined within the relevant Phase 2 DWSI(s). This approach would provide sufficient flexibility for post-consent works to be informed by final designs, without requiring the OAMS-OWSI to be amended each time a design variation is introduced. It would also ensure that all such variations are appropriately captured and addressed through the DWSI process.
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Table 8: 7.11.1 (A) Transport Assessment Addendum [REP5-165]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
8.1	Highways	General	Reviewing additional modelling data.

Table 9: 8.4.12.2 (A) Response to ISH2 Action Point 27 – Masterplans [REP5-199]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
9.1	Planning	2.4.2 <i>The opportunities identified have been informed by discussions with local authorities and review of relevant local strategies. However, the draft plans are illustrative in nature and should not be taken as indicating agreement by the Applicant that additional landscape or visual compensation is required, justified by policy, or necessary to make the development acceptable in planning terms. The position in respect of the need and justification for any proposed landscape compensation will need to be considered against the NPS policy framework and the relevant statutory tests including Regulation 122 of the CIL Regulations 2010.</i>	SCC provided its latest response regarding the necessity of the Landscape Compensatory Measures in answer to ExQ2 GEN2.2 [REP5-271] and during Issue-Specific Hearing 4, as detailed in the Post-Hearing Submission submitted at this deadline. SCC and BMSDC engaged with the Applicant on 21 May 2026, with further subsequent engagements. The Council considers that the draft constraints and opportunities plans are a positive starting basis on which matters of detail and local knowledge can be further discussed and incorporated.
9.2	Planning	2.5.4 <i>The Applicant takes the view that if all harm occasioned by linear projects such as this fell to be the subject of mitigation or full compensation then that would be clearly set out in the National Policy Statements and also delivered in other relevant cases. As stated in Section 8.2e of [REP4-302] some forms of compensation are required and are necessary (and provided) full compensation for all harm is not</i>	SCC has responded to this view in its Post-Hearing Submission for Issue Specific Hearing 4, submitted at this Deadline.

		<i>required and would be disproportionate. The ExA is referred to the legal submission and unchallenged findings on these issues in the BTNO decision, please see ExA's Recommendation Report1 (paragraphs 3.9.142-3.9.157).</i>	
9.3	Planning	<i>2.7.1</i> <i>The Applicant considers that a number of common themes emerged during engagement with the local authorities, particularly relating to improvements to the fabric of the local landscape and habitat connectivity.</i>	With particular reference to the Waveney Valley, SCC expressed an interest in public rights of way and accessibility improvements and other measures to address visual amenity.
9.4	Planning	<i>Appendix A – Waveney Valley</i>	SCC has provided high-level comments on these constraints and opportunities plans in its Post-Hearing Submission for Issue Specific Hearing 4, submitted at this Deadline.
9.5	Planning	<i>Appendix B – Gipping Valley</i>	SCC has provided high-level comments on these constraints and opportunities plans in its Post-Hearing Submission for Issue Specific Hearing 4, submitted at this Deadline.
9.6	Planning	<i>Appendix C – Burstall and Bramford</i>	SCC has provided high-level comments on these constraints and opportunities plans in its Post-Hearing Submission for Issue Specific Hearing 4, submitted at this Deadline.

Table 10: 8.9.2 (A) Applicant's Response to Second Written Questions [REP5-211]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
10.1	Health and Wellbeing	HW 2.1 <i>Communication Strategy In your response to ExQ1 HW1.9 [REP3-074] in relation to Colchester City Council's Local Impact Report (point 5 – a robust health and wellbeing monitoring framework with enforceable commitments) amongst other matters you state: "It may, however, be appropriate to identify specific actions in addition to the above that could help with understanding community mental health over the pre-construction, construction and operation periods. This could include reviewing the number and type of complaints or concerns raised during construction works through the complaints procedure identified. Complaints / concerns could be categorised by theme, type of action and</i>	SCC (Public Health) notes the Applicant's response to HW 2.1 and welcomes the inclusion of additional commitments within the updated Outline CoCP [REP5-139], in particular commitment GG37 relating to the recording and review of complaints, including themes, actions and escalation times, and complaints management procedure due for submission at Deadline 6. SCC acknowledges that these measures represent a positive step in strengthening the approach to community engagement and in providing a mechanism through which certain indicators of community concern may be captured during the construction phase. SCC suggests that it would be beneficial for the Applicant to clarify within the proposed Complaints Management Procedure, how the outputs from this and other monitoring activity will be analysed, reported, and used to inform adaptive mitigation, beyond identifying where "<i>additional communication approaches or other action may be required</i>". In SCC's view, this would strengthen alignment with an adaptive management approach, whereby monitoring is actively used to inform the ongoing refinement of mitigation measures in response to observed effects. The Applicant should also set out a clear governance framework, including responsibilities, decision making processes and escalation routes, to support this approach. Notwithstanding these positive amendments, SCC maintains the position set out throughout the examination, most recently in [REP5-271], that the Applicant's approach does not constitute a comprehensive or sufficiently robust framework for monitoring health and wellbeing impacts. In particular, SCC considers that the

	<i>speed of escalation. This would help understand where further communication may be required with local communities”.</i> <i>The suggestions put forward would appear to be applicable across the range of points raised on this issue by a number of local authorities. However, there are no commitments included in the outline CoCP [REP4- 164] or commentary related to such matters in its Appendix E [REP4- 168]. The ExA are of the view that appropriate commitments in the outline CoCP or commentary in Appendix E to set out such approaches would be necessary to bring the suggestions into effect and ensure there were appropriate enforceable commitments in the DCO documentation. The applicant is asked to update either the outline CoCP or appendix E to include suitable wording to bring into effect your suggested actions. If not explain why not.</i>	measures set out by the Applicant remain primarily focused on communications, engagement and the management of complaints, rather than the systematic monitoring of health and wellbeing outcomes. Whilst complaints data can provide a useful proxy indicator of community concerns, it is inherently reactive and partial, and does not provide a reliable or complete basis for understanding changes in population health and wellbeing over time. There remains no commitment to establish an appropriate baseline, nor to undertake any form of primary data collection or structured monitoring of key health and wellbeing indicators, including those associated with mental wellbeing such as stress, sleep disturbance, perceived control and trust in the project. In the absence of such provision, the ability to detect change over time or to attribute observed effects to the Project is limited. Accordingly, SCC continues to consider that the Outline CoCP should include a clear commitment to the development and implementation of a Health and Wellbeing Monitoring Framework. As previously set out, such a framework should establish an appropriate baseline and enable the detection of change over time, incorporating both quantitative indicators and qualitative community feedback. It should include provision for locally specific data collection to understand lived experience, alongside the use of existing population level datasets. The framework should also provide for regular reporting and defined review points, ensuring that monitoring findings are actively considered throughout the construction phase. It should include mechanisms for escalation and for agreeing further mitigation where adverse effects are identified, thereby enabling an adaptive management approach. Where practicable, the framework should align with monitoring approaches for other relevant NSIPs to support the identification of cumulative and interacting effects.
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10.2	Health and Wellbeing	Schedules 3 Requirement 7 (Construction Hours) <i>The local authorities are maintaining their concerns in regard to this requirement, especially in terms of the core working hours of 07:00–19:00 on weekdays and 07:00–17:00 on Saturdays, Sundays and bank holidays, together with additional start-up and close-down activities outside these hours. The ExA notes the applicant’s extensive response to ExQ1 [REP3-074] at question DCO 1.S10, especially at pages 210 and 211, where it states in relation to just removing Sundays or bank holidays/ other public holidays “Should these scenarios be modelled, it is anticipated that the energisation date on the baseline construction programme would remain largely unchanged.” The ExA has noted all the justifications put forward by the applicant, as well as the applicant’s final sentence in this</i>	SCC (Public Health) acknowledges the additional information provided, including the high-level programme modelling and explanation of construction scheduling assumptions. In particular, SCC notes the Applicant’s conclusion that removal of Sunday working would result in an approximate delay of 9.5 weeks, and that removal of Bank and other public holidays would have no material effect on the programme. SCC also recognises the wider context set out by the Applicant in relation to programme resilience, specialist labour requirements, and the Project’s designation as Critical National Priority (CNP) infrastructure. However, SCC maintains that the Applicant’s response places disproportionate weight on programme flexibility and delivery risk, without sufficient regard to the role of construction hours as a primary mitigation measure to protect public health and residential amenity. As previously set out, including [Rep1-178] and most recently in [REP5-271], the proposed working hours would expose communities to prolonged disturbance, with limited opportunity for predictable and meaningful respite. This is a matter of particular concern given the scale, duration and geographic extent of the Project. SCC notes the Applicant’s explanation that Sunday and public holiday working may form part of the “<i>practical deployment model for specialist labour</i>”, including reference to “<i>patterns such as 12 days working and two days off in every 14 days</i>”. Whilst SCC recognises that certain specialist activities may require intensive or time constrained working patterns, it does not follow that such requirements necessitate the routine inclusion of Sundays and Bank Holidays within core working hours. SCC considers that such activities could be accommodated through a controlled exception based approach, whereby works outside standard hours are clearly justified, time limited, and agreed in advance with the relevant local authority.
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	<i>question where it states “...removal of sundays and/or bank holidays and public holidays from the core working hours would not represent a neutral change; rather, it would reduce flexibility and introduce unnecessary risk on the timely delivery of the project.” The applicant is asked to model the scenarios of removing: a) just sundays b) just bank and other public holidays c) sundays and bank and other public holidays and then confirm whether the energisation date on the baseline construction programme would remain largely unchanged in relation to each of those scenarios. The ExA asks the local authorities to collaborate and provide a single form of wording for this requirement that they consider to be a reasonable compromise that collectively satisfies the concerns being raised in regard to this requirement, so this can assist in informing a discussion at ISH3</i>	Similarly, SCC notes the Applicant’s position that “<i>all other consented electricity transmission Nationally Significant Infrastructure Projects have been granted seven-day working</i>”. SCC considers that current circumstances within Suffolk are materially different to previously consented projects. The county is experiencing, and is expected to continue to experience, a notably high concentration of NSIPs, giving rise to an elevated risk of cumulative and sequential construction impacts. The resulting need for clear, consistent and predictable periods of respite is greater, not less, than previously consented projects. The application of a standardised approach to working hours gleaned from other projects does not adequately account for these locally specific cumulative pressures. SCC also acknowledges the targeted controls referenced by the Applicant, including restrictions on percussive piling and limitations on HGV movements outside defined daytime periods. These controls are welcomed as mitigation for activities known to give rise to higher levels of noise and disturbance. However, SCC emphasises that a wide range of other construction activities can also give rise to material impacts on local communities. Activities that generate sustained noise and vibration, create temporary or repeated severance of routes, restrict access to green space and community assets, introduce ongoing uncertainty and disruption to daily routines. In this context, SCC considers that the reliance on selected activity specific controls alone does not fully address the breadth of potential impacts arising from the overall pattern and duration of construction activity. This reinforces the role of construction working hours as a primary and necessary mitigation measure to ensure that communities experience regular and predictable periods of respite. In relation to the Applicant’s wider justification, including reference to system constraint costs and the Project’s CNP designation, SCC considers that CNP does not displace the need to fully apply the mitigation hierarchy. The need case and national policy context do not provide a basis for avoiding or minimising mitigation
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		<i>into the draft DCO. The wording submitted should include, but not be limited to, the core construction hours specified, start and close down activities and the operations that may take place outside of those core working hours.</i>	where this is reasonably practicable in respect of impacts on human health and wellbeing. The establishment of appropriate construction working hours remains a fundamental and effective means of mitigating health effects at source. Accordingly, SCC maintains its position as set out in [REP5-271] that construction activity should be limited to Monday to Friday 07:00–19:00 and Saturday 08:00–13:00 and may not occur on Sundays, bank holidays and other public holidays (the core working hours), unless otherwise approved by the relevant planning authority.
10.3	Highways	TT2.7	Noted that exceedance of assessed HGV numbers is not considered a non-compliance with the OCTMP.
10.4	Highways	TT2.11	Whilst SCC accepts that there is not a consistent approach to HGV caps on linear DCOs, it is felt that the lack of a cap implies a level of non-confidence by the applicant for their worst case scenario HGV numbers. Examples of DCO's including caps on HGV movements are SPR EA1(N) and EA2, Sizewell C.
10.5	Highways	TT2.12	Recent experience with delivery of an NSIP has indicated that the Applicant must retain control of AIL hauliers and not sublet movements to them in their entirety. This has resulted in the LHA having to explain the agreed DCO process to another party.

Table 11: 8.13 (A) Outline Employment and Skills Plan [REP5-215]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
11.1	Skills	1.1.3, 1.1.5, 7.2.2 – Scope, purpose and reliance on post-consent detail	SCC considers that the OESP does not represent a sufficiently robust or integrated approach to understanding or managing the workforce, skills and supply chain implications of the Project. While the Plan establishes a high-level framework, it defers the definition of core elements—including workforce demand, skills requirements, interventions and delivery mechanisms—to a post-consent stage. This creates a fundamental gap in the evidence base at the point of examination. In SCC's view, this approach prevents a clear understanding of how workforce demand has been derived, how it will change over time across different construction phases, and how this demand translates into specific skills needs and supply chain requirements. Without this information, it is not possible to establish whether the proposed approach is proportionate, deliverable or capable of responding to identified labour market constraints. SCC also does not agree with the characterisation of the OESP solely as a benefits-led document. Workforce demand associated with NSIPs has the potential to give rise to adverse effects, including labour displacement, wage inflation and pressure on local services. The positioning of the OESP as a benefits-focused plan risks overlooking the need to identify, assess and mitigate such impacts in accordance with the mitigation hierarchy. These issues are compounded by the proposed approach to securing the Final ESP, which requires submission “for information” only. SCC considers that this does not provide an adequate mechanism to ensure that the ESP is robust, evidence-led or aligned with local and regional priorities. In this context, the ESP cannot currently be relied upon as an effective control or mitigation mechanism.

11.2	Skills	2.1, 2.3 Figure 2.1 Sections 3 and 4 – Workforce evidence base, modelling and labour market capacity	SCC considers that the OESP is not underpinned by a sufficiently robust or detailed evidence base to support the assessment of workforce and labour market impacts. While headline job numbers and indicative peak workforce figures are provided, these are not supported by detailed, phase-specific modelling or clear assumptions regarding workforce composition, skills requirements or spatial distribution. In particular, the absence of scenario-based modelling, including a reasonable worst-case workforce scenario, represents a critical gap. The OESP does not provide a clear understanding of how workforce demand will vary over time, including the timing and intensity of peak demand, nor how this will interact with existing labour market capacity. Without this, it is not possible to assess the scale, timing or geographical distribution of impacts. The assumption that approximately 10% of the workforce will be locally sourced is not supported by a clear evidential basis or delivery strategy. Nor is there sufficient analysis of whether the local labour market has the capacity to absorb this demand. While the OESP describes the labour market baseline, it does not test supply against demand or consider how workforce requirements will interact with existing employment, replacement demand and other infrastructure activity. SCC therefore considers that, in the absence of robust, phase-specific and scenario-based evidence, it is not possible to determine the scale or significance of labour market effects. This, in turn, undermines the robustness of the Environmental Statement conclusions that no significant adverse effects would arise.
11.3	Skills	4, 6 and 2.3 – Cumulative effects, displacement and interaction with wider growth	SCC agrees that the OESP identifies the existence of skills shortages and acknowledges the presence of multiple NSIPs drawing on a shared labour pool. However, this context is not translated into a quantified or evidence-led assessment of cumulative effects.

			The OESP does not assess how workforce demand from this Project will overlap temporally or spatially with other infrastructure projects, nor how peak demand periods may coincide. There is no modelling of cumulative labour demand, no assessment of supply chain constraints under stress, and no analysis of labour displacement effects. As a result, key risks—including labour market saturation, displacement from other sectors, and inflationary pressures—are not properly understood or assessed. SCC further notes that the OESP does not consider the interaction between NSIP demand and wider growth pressures, including housing delivery, port activity and regeneration programmes. These sources of demand are likely to compete for the same labour and supply chain capacity but are not incorporated into a comprehensive assessment. In the absence of a quantified, evidence-led cumulative assessment, SCC considers that cumulative labour market effects are not properly assessed or managed.
11.4	Skills	2.5, 6.1–6.3 – Supply chain, skills delivery and intervention design	SCC considers that the OESP does not adequately address the interrelationship between workforce demand, skills provision and supply chain delivery. While each element is discussed individually, the Plan does not treat these as a coordinated system. There is no clear line of sight demonstrating how workforce demand translates into specific skills requirements, how these are met through targeted interventions, and how this in turn enables supply chain participation. This lack of integration is a fundamental weakness, as supply chain delivery is inherently dependent on the availability of a suitably skilled workforce. The proposed interventions are high-level and aspirational, and are not linked to quantified demand. The OESP relies heavily on existing national programmes but does not demonstrate how these will be scaled or adapted to meet the specific needs of the

			Project. Nor does it assess the transferability of existing skills or identify where targeted retraining is required. The OESP also acknowledges that training provision may not deliver the required skills within the timeframe for construction, which raises further questions as to the realism of assumptions regarding local labour participation. SCC therefore considers that the OESP does not currently function as an integrated workforce, skills and supply chain strategy, and does not provide confidence that impacts can be effectively managed or that opportunities can be realised.
11.5	Skills	2.2, 2.3.5 and 4 – Spatial and infrastructure impacts	SCC notes that the spatial definition of the Study Area is broad and does not distinguish clearly between local, sub-regional and regional labour markets. This limits the ability to understand how impacts will be distributed geographically and may mask localised capacity constraints. In addition, the OESP does not sufficiently consider the temporal distribution of workforce demand or the implications of peak activity. There is limited assessment of how workforce peaks may align with other projects, or how this may give rise to short-term but significant pressures on accommodation, transport networks and local services. While increased spending is identified as a potential benefit, the OESP does not assess associated pressures, including affordability impacts or displacement within local markets. These effects are relevant to understanding the full socio-economic impact of the Project and should be assessed alongside labour market effects.
11.6	Skills	6.4 and 7 – Governance, coordination and role of the RSCF	SCC welcomes recognition of the Regional Skills Coordination Function (RSCF) but considers that its role is insufficiently defined and largely deferred to a post-consent stage. Effective management of labour market impacts—particularly in a cumulative context—requires early, structured and ongoing coordination.

			The OESP does not provide a clear governance framework, including defined roles, responsibilities or decision-making processes. Nor does it establish how coordination across multiple contractors and projects will be achieved in practice. This creates a risk of fragmented and inconsistent delivery. SCC considers that a clear governance structure is required, with defined arrangements for coordination, monitoring and ongoing management of the ESP. This is particularly important given the dynamic nature of labour markets and the likelihood of changing conditions over the construction period.
11.7	Skills	6 and 7 – Monitoring, targets and enforceability	SCC considers that the OESP lacks a clear and enforceable framework for monitoring, reporting and performance management. There are no defined targets, key performance indicators or measurable outcomes for employment, skills or supply chain delivery. There is also no clear baseline against which success can be measured, nor a structured framework for data collection, reporting or review. In the absence of these elements, it is not possible to assess whether the ESP is delivering its intended outcomes or to identify and respond to emerging issues. SCC considers that the ESP must function as a delivery tool rather than a statement of intent. This requires clearly defined targets, measurable indicators, regular reporting and mechanisms for review and intervention where necessary. Given the reliance on the ESP as a key mechanism for managing socio-economic effects, these deficiencies raise significant concerns regarding the precision, effectiveness and enforceability of the proposed DCO Requirement.

Table 12: 8.18 (A) Detailed Written Scheme of Investigation - Mitigation areas 102 (a, b, c & d) & 146 (1) [REP5-217]; 8.19 (A) Detailed Written Scheme of Investigation - Mitigation area 103 [REP5-218]; 8.20 (A) Detailed Written Scheme of Investigation - Mitigation areas 122 and 123 [REP5-219]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
12.1	Archaeology	General	The SCCAS comments that follow are general comments as all three submitted DWSIs for Suffolk Priority Areas use the same broad DWSI document model. Amendments have been requested for 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-162] which will impact the content of the DWSI, and further amendments to the DWSIs maybe required because of this. The mitigation areas do not reflect those that have been discussed with the applicant in a meeting held on 11 June 2026, SCCAS do not believe the mitigation areas as represented provide adequate mitigation and heritage protections form the impacts of the development. Therefore, the DWSIs cannot be approved at this stage.
12.2	Archaeology	1.5 Project Roles	Paragraph 1.5.1 should be amended to provide clarity: <i>National Grid will be responsible for instructing the works and providing necessary information on scope <u>of development impacts</u> including <u>accurate and up-to-date plans for the development.</u></i> Paragraph 1.5.2 should have the ACoW added in as the liaison between the Main Works Contractor, National Grid and SCCAS. SCCAS would recommend the following addition:

			<i>The ‘Main Works Contractor’ will be responsible for control of the Site and all contractors on it during the construction phase. The Main Works Contractor, when appointed <u>in consultation with the ACoW team</u>, will oversee all stages of work with responsibility for health and safety, welfare and site security, and will ensure that appropriate temporary works required to facilitate the archaeological work are in place.</i> Paragraph 1.5.3 should be amended to clearly define the role and responsibility of the ACoW within the project. <i>The Archaeological Clerk of Works (ACoW) team will be appointed by National Grid and will act on its behalf to monitor the implementation of archaeological mitigation measures. The ACoW team will act as the principal liaison between National Grid, the Main Works Contractor and SCCAS in relation to the planning, coordination, monitoring, progress and sign-off of the archaeological works. An ACoW team will be on site for the duration of the works to oversee the <u>progress of the</u> archaeological works and monitor them to ensure that all archaeological works are undertaken in compliance with the <u>QAMS-OWSI</u> and relevant DWSIs. An ACoW team will be responsible for liaising with the LPA Archaeological Advisor on behalf of National Grid in accordance with the roles and responsibilities set out in the AMS-OWSI (Section 1.7).</i> Paragraph 1.5.5 should be amended to state that SCCAS is the responsible body for monitoring the archaeological works to ensure compliance with the requirements of the DCO. SCCAS would recommend the following amendment: <i>Suffolk County Council Archaeological Service (SCCAS) is the LPA Archaeological Advisor, responsible for <u>monitoring the archaeological works</u> and confirming that the requirements of the DCO are met and for sign-off of the archaeological works, in accordance with the <u>QAMS-OWSI and DWSI</u>.</i>
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			Paragraph 1.5.6 This needs amending as it is clearly set out in the OAMS-OWSI that the only archive repository in Suffolk is the Suffolk County Council Archaeology Archive. There are no museums in Suffolk that currently meet the appropriate requirements for long term storage of an archaeological archive, and it is the Suffolk County Council Historic Environment Record which issues the parish codes. <i>The ‘project archive repository’ is the organisation, a suitable museum in Suffolk, responsible for the long-term curation of the project archive, including the field notes, plans, photographs and archived finds. The archaeological contractor will establish the project archive repository. <u>in the case of Suffolk this will be the Suffolk County Council Archaeological Archive</u> prior to starting the work <u>and will contact the Suffolk County Council Historic Environment Record to</u> be assigned a unique project reference number (‘parish code’).</i>
12.3	Archaeology	3.2 Archaeological Detailed Excavation Areas	Section 3.2 None of the proposed mitigation areas within the DWSIs are currently agreed. This section and corresponding plans (appendix A) will need amending in accordance with the meeting held between SCCAS and the Applicant on 11th June 2026.
12.4	Archaeology	4.1 Research agenda	Paragraph 4.1.1 states that “The research questions, aims and objectives will be subject to ongoing review during the mitigation works and may be refined as appropriate in response to emerging results, subject to agreement with SCCAS and The Client.” This should be amended to the following: The research questions, aims and objectives will be subject to ongoing review during the mitigation works and may be refined as appropriate in response to emerging results, subject to agreement with SCCAS <u>and in consultation with</u> the Client Paragraph 4.1.3 add in a bullet points stating:

			• <u>The approach adopted for the site will remain flexible to accommodate new discoveries and emerging research priorities identified during the mitigation works.</u> Paragraph 4.1.4 another bullet point stating: • <u>Additional research aims may be developed during the course of the archaeological mitigation including during fieldwork and post-excavation work in accordance with the principles set out in the OAMS-OWSI and subject to agreement with SCCAS.</u> Paragraph 4.1.5 add an additional bullet point to stating: • <u>These objectives represent the current research priorities for investigation but may be supplemented or refined in response to the results of archaeological fieldwork and post-excavation assessment.</u>
12.5	Archaeology	5.1 Standards for Archaeological Work	Since the DWSIs do not identify the archaeological contractor who will undertake the mitigation works and states that the following will be detailed in a contractor method statement: • environmental sampling, • scientific dating, • finds procedures for the recovery, treatment and storage of artefactual and ecofactual material, • list of appropriately experienced specialists (with regional expertise), • detailed programme of work, • data management plan, • contractor site specific health and safety and risk assessment,

			• insurance, • staff provision, • preparation of the archive for deposition • parish codes Therefore, there must be a mechanism in the DWSI by which the Contractor Method Statement can be reviewed and approved by the LPAAA. SCCAS therefore advise the following amendment in paragraph 5.1.3: 5.1.3 <i>Prior to the commencement of works, the appointed archaeological contractor will prepare a site-specific archaeological contractor method statement (SSACMS) for the archaeological mitigation area set out within this DWSI. This will present a response to be in general accordance with the standards set out within this DWSI, and will comply with the standards set out in the AMS-OWSI. The SSACMS will include a full programme for the archaeological work that would be referenced against key milestones and events in the overall design and construction programme. All work will comply with relevant standards and technical guidance (Chartered Institute for Archaeologists, 2023 (Ref 9 and Ref 10); SCCAS, 2026 (Ref 23). <u>National Grid's Archaeological Advisor will submit the DWSIs to the LPA for approval subject to review by the appropriate LPAAA and where required Historic England. Where a SSACMS is required under the DWSI, the SSACMS shall be submitted to the LPAAA for review and approval. Archaeological fieldwork shall not commence until an approved DWSI, and where appropriate SSACMS, is in place.</u></i> This closes the procedural gap created by the submitted DWSIs and ensures key archaeological mitigation details, which are deferred in the DWSIs, remain within the formal archaeological approval process.
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			Paragraph 5.1.4 The statement “<i>and any other factors that may affect delivery</i>” can be read as relating to the construction project delivery, and there needs to be clarity that it relates to delivery of the archaeological fieldwork, the DWSI also identifies other aspects of the archaeological project that will be detailed in the SSACMS, and therefore should be included in paragraph 5.1.4, see below: 5.1.4 The archaeological method statement site-specific archaeological contractor method statement must include: • A detailed programme of work that sets out the proposed sequence of tasks, anticipated timescales, staffing arrangements, and any other factors that may affect delivery <u>of the archaeological fieldwork (e.g. water management adverse weather conditions etc.).</u> • <u>list of appropriately experienced specialists (with regional expertise)?</u> • <u>finds procedures for the recovery/treatment and storage of artefactual and ecofactual material?</u> • <u>environmental sampling?</u> • <u>scientific dating?</u> • <u>details of appropriate plant</u> • A Data Management Plan which will describe the type of data that will be acquired and/or generated during the project, the way the data will be managed and stored, and the mechanisms to be employed to preserve and share the data. • The site-specific Health and Safety arrangements that outline the main risks associated with the works and control measures to mitigate these. Information on inductions, PPE, welfare, access, and emergencies will be included. • Confirmation of insurances that cover the planned works.
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			- The number of staff and the relevant staff CVs. The museum accession numbers and Identification of the relevant archive repository, <u>for Suffolk this will be the Suffolk County Council Archaeological Archive.</u> - The specific parish codes that will be used during the project.
12.6	Archaeology	5.2 Detailed Excavation? 5.3 Environmental Sampling and Scientific Dating? 5.4 Finds Processing? Conservation and Human Remains	The methodology set out here will need amending to reflect the amendments to the OAMS-OWSI, see SCCAS comments on document 7.5 The Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-162] and will all need to be significantly expanded upon in the Archaeological Contractor Method Statements.
12.7	Archaeology	5.5 Communication? Monitoring and Sign-Off	Paragraph 5.5.1 it is the responsibility of SCCAS to monitor the archaeological mitigation works for compliance with the requirements in the DCO. Therefore, SCCAS would recommend the following amendments: All archaeological works will be subject to monitoring by the ACoW team <u>and SCCAS?</u> and sign-off by SCCAS, in accordance with the AMS-OWSI (Ref 6): - Archaeological areas will remain under archaeological control until formally agreed as completed and <u>written sign-off has been received from SCCAS.</u> <u>The ACoW will be responsible for ensuring access for SCCAS to complete site monitoring visits.</u> - Clear communication will be maintained between the archaeological contractor <u>SCCAS</u> and construction teams via the ACoW team.

			- Areas will only be released once archaeological works have been signed off by SCCAS. Paragraph 5.5.3 SCCAS should be included in the weekly summary progress memo, as this will facilitate smooth delivery of the archaeological fieldwork. SCCAS recommend the following amendment to 5.5.3: <i>The archaeological contractor will provide The Client, ACoW team and, if appropriate, SCCAS, with a weekly summary progress memo (1–2 pages). This will:</i> <i>Summarise the work undertaken during the week and the key findings.</i> <i>Report on site attendance, where appropriate.</i> <i>Confirm that the work will be completed to programme and identify any potential issues to programme.</i> <i>Identify any health and safety issues (including near miss).</i> <i>Post Excavation Programming, following fieldwork.</i> Paragraph 5.5.4 This is not the sole responsibility of the ACoW, SCCAS would recommend the following amendment for clarity: <i>The archaeological contractor will provide all information reasonably practicable to the ACoW team for forwarding to SCCAS to enable them to monitor compliance with this DWSI – e.g. site surveys, intervention plans, records and finds data etc.</i> Paragraph 5.5.5 Please see comments on 7.5 The Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-162] and amended appropriately.
12.8	Archaeology	5.6 Post-Excavation² Reporting and Archiving	This section is very light on detail for a DWSI, and should be improved, this would usually not be something that would be developed within a site-specific archaeological contractor’s method statement. The OAMS-OWSI states that an archiving strategy,

			including digital data, will be developed prior to the preparation of any DWSIs, this is not included in the DWSI and further detail is required regarding archiving strategy. SCCAS would recommend the following amendments: <i>5.6.1 Post-excavation works will be undertaken in accordance with the AMS-OWSI Section 6.3 (Ref 6) and SCCAS requirements (2026 (Ref 23)) and will include:</i> <u>5.6.2 Within six weeks of the end of fieldwork a written timetable for post-excavation assessment, updated project design and/or reporting must be produced, which must be approved by SCCAS. Following this, a written statement of progress on post-excavation work – whether assessment, analysis, report writing and publication or archiving – will be required at regular intervals.</u> <u>5.6.3 A post-excavation assessment (PXA) report on the fieldwork should be prepared in accordance with the principles of <i>Management of Research Projects in the Historic Environment (MoRPHE)</i> (Historic England 2015) and the PXA must present a clear and concise assessment of the archaeological value and significance of the results, and identifies the research potential, in the context of the Regional Research Framework which is available online at https://researchframeworks.org/eoe/ (see also <i>East Anglian Archaeology</i>, Occasional Papers 3, 8 and 24, 1997, 2000 and 2011).</u> <u>5.6.4 The PXA will act as a critically assessed audit of the archaeological evidence from the site; see <i>ALGAO Advice Note for Post Excavation Assessment (2015)</i> to be submitted within six months of completion of the archaeological mitigation for relevant development stage, unless otherwise agreed in writing with the Client and SCCAS and in consultation with National Grid.</u>
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			<u>5.6.5</u> <i>An updated project design (UPD), to be completed within one year of completion of the archaeological mitigation for the relevant development stage. This must be prepared in accordance with the principles of Management of Research Projects in the Historic Environment (MoRPHE) (Historic England 2015) and contain a timetable for analysis dissemination and archive deposition. The UPD will provide the basis for measurable standards for SCCAS to monitor this work.</i> <u>5.6.6</u> <i>An archive of all records and finds is to be prepared consistent with the principles of MoRPHE. It must be adequate to perform the function of a final archive for deposition in the Archaeological Store of SCCAS (see Archaeological Archives Forum: a guide to best practice 2007).</i> <u>5.6.7</u> <i>Finds must be appropriately conserved and stored in accordance with guidelines from The Institute of Conservation (ICON).</i> <u>5.6.8</u> <i>National Grid must get the agreement of the landowner(s) to the deposition of the site archive and transfer of title with SCC County Archaeology Store.</i> <u>5.6.9</u> <i>The commissioned archaeological contractor should consult SCCAS Archaeological Store before the archive is prepared regarding the specific requirements for the archive deposition and curation and regarding any specific cost implications of deposition. A clear statement of the form intended content and standards of the archive is to be submitted for approval with SCCAS and comply with SCCAS Guidelines for Archive Preparation and Deposition (2026).</i> <u>5.6.10</u> <i>The PXA should offer a statement of significance for retention based on specialist advice and - where it is justified – the UPD should propose a discard strategy. This must be agreed with SCCAS prior to implementation.</i>
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			<u>5.6.11 Archive deposition charges will be charged at the Post Excavation Assessment (PXA) and Updated Project Design (UPD) stage of work prior to the relevant requirement the site being signed off for that development stage.</u> <u>5.6.12 The UPD shall state proposals for the deposition of the digital archive relating to this project with the Archaeology Data Service (ADS) adhering to the requirements for digital archives set out in SCCAS Guidelines for Archive Preparation and Deposition 2026 and allowance should be made for costs incurred to ensure proper deposition (http://ads.ahds.ac.uk/project/policy.html).</u> <u>5.6.13 All Suffolk sites will be accessed via an ADS Suffolk Landing Page. Therefore when depositing data from Suffolk sites ADS will need to be informed that the site will need to be added to the Suffolk page.</u> <u>5.6.14 Following acceptance a digital copy of the approved final report should be submitted to the Suffolk Historic Environment Record.</u> <u>5.6.15 Digital vector plans of mitigation areas recorded archaeological features and excavated sections should be provided as georeferenced (EPSG: 27700) ESRI shape or QGIS GPK files. These files should have the relevant attributes attached to them including: HER Parish Code Primary Reference Number eg (Section Number; Context Number; Sample Number; Small Find number; etc); Group or Feature Number; Archaeological Periods and Phases. These GIS files should be provided to the Suffolk HER following approval of the final report.</u> <u>5.6.16 At the start of work (immediately before fieldwork commences) an OASIS online record http://ads.ahds.ac.uk/project/oasis/ must be initiated and key fields completed on Details Location and Creators forms. When the project is completed all parts of the OASIS online form must be</u>
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			<u>completed and a copy must be included in the final report and also with the site archive. A .pdf version of the entire report should be uploaded to the OASIS website.</u> Paragraph 5.6.1 states that the Post Excavation Assessment Report (PXA) would be submitted within six months of the completion of the archaeological mitigation for the relevant development stage, and states that the Updated Project Design (UPD) would be completed within one year of the completion of the archaeological mitigation for relevant development stage. This is unusual, as standardly a stage UPD is incorporated into the PXA, and this is drawn together into a larger UPD for the entire project at a later stage. SCCAS would like to raise this at this stage as the applicant may wish to reconsider how this is set out as this would interrupt delivery of the post-excavation programme. Paragraph 5.6.2 should have an amendment to highlight the incorporation of site specific PXA and UPD into the wider project UPD: All results will be: • Integrated into the wider project framework Updated Project Design. • Assessed against the East of England Research Framework (ERF) (Ref 2) • Made available through appropriate dissemination and reporting and appropriate to the significance of the archaeology identified. As a minimum a summary report must be prepared in the established format suitable for inclusion in the annual ‘Archaeology in Suffolk’ section of the Proceedings of the Suffolk Institute of Archaeology and History. It should be included in the project report or submitted to SCCAS/CT by the end of the calendar year in which the work takes place whichever is the sooner
12.9	Archaeology	6. Programme staffing and attendance	Paragraph 6.1.2 refers to an “archaeological fieldwork subcontractor” providing the detailed programme, staffing resources and CVs through a method statement. This

			terminology is inconsistent with the defined role of the “Archaeological Contractor” used elsewhere in the DWSI. For clarity and consistency, “archaeological fieldwork subcontractor” should be amended to “Archaeological Contractor”, unless a separate subcontractor role is intended, in which case that role should be clearly defined.
12.10	Archaeology	7. Health & Safety & Security and Environmental (HSSE)	Paragraph 7.1.1 The Main Works Contractor and the Archaeological Contractor should take all reasonable steps to facilitate the completion of the archaeological excavation whilst complying with safe working practices. Therefore, SCCAS would recommend the following addition: <i>Health and Safety will take priority over all other requirements. A conditional aspect of all archaeological work is both safe access to the area of work and a safe working environment. The project will be carried out in accordance with safe working practices. <u>The Main Works Contractor and the Archaeological Contractor should take all reasonable steps to facilitate the completion of the archaeological excavation to appropriate standards whilst complying with safe working practices.</u></i> Paragraph 7.1.3 Question: should this not be the responsibility of the ACoW rather than the archaeological contractor? As security should be a scheme wide consideration and this may prove difficult if multiple archaeological contractors are working on the project. Paragraph 7.1.6 add in an additional bullet point: • <u>The RAMS must be kept under continuous review and amended to reflect changes in site conditions, working methods, hazards or control measures change or following an incident or near miss. Any amendments will be subject to appropriate review and approval before the affected works proceed.</u>