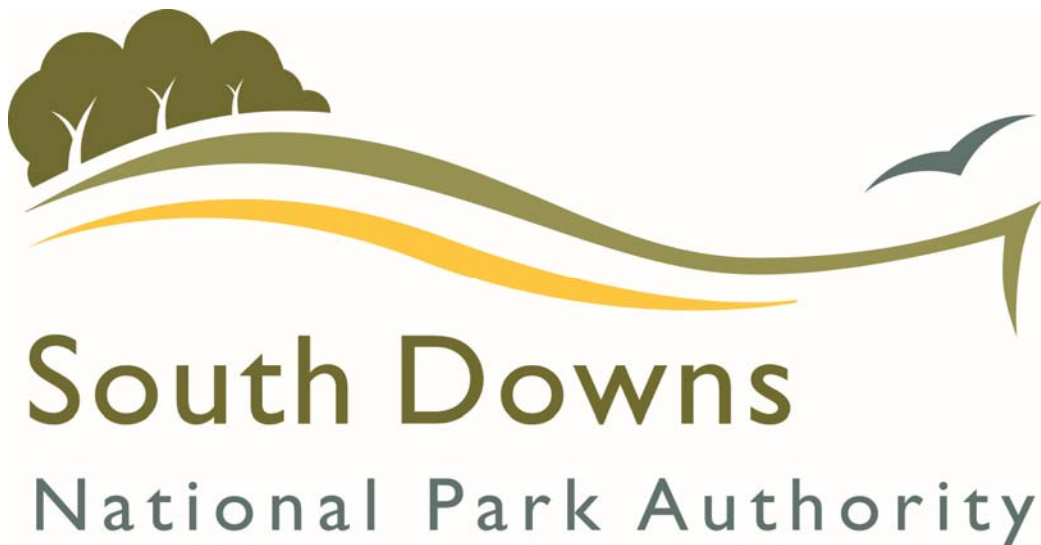


Southampton to London Pipeline Project

Deadline 3 Submission



December 2019

Contents

	Page
1. Summary of this document	3
2. Summary of oral submissions at the Hearings	3
3. Action Points from Hearing on 27 November	5
4. Action Points from Hearing on 3 December	5
5. Action Points from Hearing on 4 December	9
6. Response to the applicant's <i>Comments on Local Impact Reports</i> document submitted at Deadline 2	10
7. Appendix One – Draft table of contents for a Landscape and Ecological Management Plan (LEMP)	12

1. Summary of this document

- 1.1 This document summarises, in chapter 2, the points made by the South Downs National Park Authority (SDNPA) at the recent Hearings on 27 November, 3 December and 4 December. It should be read in conjunction with the inevitably more comprehensive Local Impact Report and Written Representation submitted by the Authority at Deadlines 1 and 2 respectively. A key topic of discussion at the hearing was the re-entry of the pipeline into the northern part of the National Park and the requirement, at paragraph 5.9.10 of the Overarching National Policy Statement for Energy (EN-1), that consideration of such applications should include an assessment of the cost of, and scope for, developing elsewhere outside of the National Park. The SDNPA does not consider that the applicant has met the requirements of this policy test as it relates to the re-entry of the pipeline into the northern part of the National Park.
- 1.2 Chapters 3, 4 and 5 of this document respond to the action points issued by the Examining Authority following each day of the recent Hearings. Of particular note the SDNPA sets out in chapter 4 the draft heads of terms it is seeking from the applicant through a Section 106 legal agreement and how these comply with the requirements of paragraph 4.1.8 of the Overarching National Policy Statement for Energy (EN-1) that sets out the requirements for such legal obligations.
- 1.3 Chapter 4 also sets out the details that the Authority consider should be covered by the applicant in an Landscape and Ecological Management Plan and includes, as requested by the Examining Authority, proposed revised wording for a DCO requirement that we wish to see adopted in respect of the Landscape and Ecological Management Plan. Appendix 1 provides a suggested table of contents for this Landscape and Ecological Management Plan and this will now be discussed with the applicant ahead of Deadline 4.
- 1.4 Chapter 6 provides SDNPA's response to the applicant's document, submitted at deadline 2, entitled *Comments on Local Impact Reports*. A number of comments are made, including in relation to the statutory purposes of the National Park and the regard that the Examining Authority must have to these statutory purposes as a result of both Section 62 of the Environment Act 1995 and paragraph 5.9.9 of the Overarching National Policy Statement for Energy (EN-1).

2. Summary of oral submissions at the Hearings

- 2.1 The SDNPA made a number of points at the Hearings on 27 November and 3 and 4 December. These points should, of course, be taken into account in conjunction with the more detailed and inevitably more comprehensive Local Impact Report and Written Representation provided by the Authority, together with the Authority's response to the Examining Authority's first set of questions (reference ExQ1).
- 2.2 A summary of the main points made by the SDNPA at the Hearings, in a broadly chronological order, is as follows:
 - 2.2.1 The SDNPA considers, should the DCO application be granted, that Local Planning Authorities be given 56 days, and not the 42 days now proposed by the applicant, to determine applications to discharge DCO requirements
 - 2.2.2 The SDNPA considers that local planning authorities, and not Highways Authorities, determine the acceptability or otherwise of the Construction Traffic Management Plan required as part of the DCO requirements (should the application for Development Consent be granted).
 - 2.2.3 The sweeping powers to remove any vegetation in the vicinity of the scheme

which the applicant seeks through Article 41 & 42 of the draft DCO provides further concern to the SDNPA that the proposed scheme delivered on the ground has not been adequately assessed and has hidden impacts which have not been accounted for and, perhaps, cannot be addressed within the current DCO structure and order limits.

- 2.2.4 The proposed construction hours, set out in proposed requirement number 14, are in dispute as per the comments made in SDNPA's Local Impact Report submitted at deadline 1 and our Written Representation submitted at deadline 2.
- 2.2.5 The SDNPA reiterated the requirement of paragraph 5.9.10 of the Overarching National Policy Statement for Energy (EN-1) that development in National Parks should be demonstrated to be in the public interest and that the consideration of such applications should include an assessment of the cost of, and scope for, developing outside of the designated area. Both the applicant and the SDNPA, in written representations and at the Hearing itself, accept that this test applies to the development proposal. At the Hearing SDNPA set out that the applicant had only provided a cursory assessment (on account of the very limited information provided) of the cost of, and scope for, developing outside of the northern part of the National Park. SDNPA do not consider that sufficient information or justification has been provided by the applicant to satisfy this test and that, therefore, the Examining Authority has insufficient information on the cost of, and scope for, developing outside the northern part of the National Park. The SDNPA note that paragraph 5.9.10 was drafted to protect the interests of National Parks.
- 2.2.6 The SDNPA confirmed, with reference to the first bullet point in paragraph 5.9.10, that it raised no issue with the need for the development.
- 2.2.7 A detailed assessment of the impacts of the proposal on the National Park is contained within the Authority's Written Representation submitted at Deadline 2. However, in the Hearing the Examining Authority's questions were concerned with the harm caused to the National Park as a result of the pipeline re-entering the northern part of the National Park. In summary the harm caused to the northern part of the National Park as a result of the proposal is:
- i) Landscape: an additional 5km of the route within the National Park with associated landscape impacts during and post construction and in close proximity to the St Swithuns Way
 - ii) Adverse, and unquantified, impact on trees, woodland and Ancient woodland within this section of the route
 - iii) Harm to Chawton Registered Parkscape
 - iv) Impacts on the National Park from intrusion caused by traffic and human activity within the otherwise undeveloped, rural and still landscape
 - v) The proposed logistics hub at Chawton (A31/A32 junction) – a focus of activity and operations for the duration of the project and located proximate to the boundary of the National Park
- 2.2.8 In the Hearing the SDNPA stated that it believed a draft structure for the Landscape and Ecological Management Plan (LEMP) should be produced by the applicant during the examination in order to set out and agree in principle the scope of this document between the various relevant authorities, the applicant and the Examining Authority. The SDNPA also asked that the outline LEMP be a certified document within Schedule 11 of the proposed Development Consent Order. Of particular importance is the need for the preparation of the LEMP to properly document and record the extent of vegetation removal given that it has not been possible at this stage to identify the amount and location of vegetation to be removed.

- 2.2.9 Relating to the Register of Environmental Actions and Commitments (REAC) SDNPA noted that where caveats and 'tails' are specified which exclude the REAC from being delivered in certain situations that alternative and appropriate measures are identified in lieu of these actions.
- 2.2.10 The SDNPA also raised at the Hearing a clarification in respect of British Standard 5837. The applicant stated in the Hearing that they are surveying trees greater than 200mm diameter at breast height whereas British Standard 5837 expects surveys for individual trees of 75mm diameter at breast height and, for woodland, at 150mm diameter at breast height. The SDNPA also noted the conflicting, contradictory and confusing principles of tree protection and the fact that the proposals rely on a combination of NJUG Regulations, British Standard 5837 and the applicant's Ancient Woodland Method Statement recently supplied to stakeholders.
- 2.2.11 At the Hearing it was indicated that only the Woodland Trust can certify a tree as a veteran tree. However, as a post hearing clarification, the SDNPA wishes to correct the record as this is not the case; the methodology for determining if a tree is veteran is freely available to any competent arboriculturalist. In SDNPA's view Esso should record and notify the Woodland Trust of any trees that meet the criteria for a veteran tree, and apply the guidance to protect them as set out in Natural England's and the Forestry Commission's joint standing advice entitled: *Ancient woodland, ancient trees and veteran trees; protecting them from development*. This standing advice should be applied in terms of setting a buffer for identified veteran trees that would be affected by the development, not just those veteran trees within the Order limits.
- 2.2.12 With reference to the applicant's recent consultation concerning the reduction in the number of logistics hubs from six to two the SDNPA queried, with regard to the proposed hub at the A31/A32 junction in Alton, what, if any, impact the National Park designation has had on this decision given that this hub is proximate to the boundary of the National Park and within the National Park's setting; whereas the four logistics hubs proposed to be removed are not.

3. Action Points from Hearing on 27 November

- 3.1 The Examining Authority issued a number of action points following the conclusion of the hearings on 27 November and 3 and 4 December. The SDNPA's response to these action points is given below with reference to the relevant action number.

Action 14 – Local Authorities to review Requirement 6(2) for any omissions

- 3.2 The applicant stated, during the Hearing, that they would provide a lighting management plan. Subject to this being secured through the DCO requirement the SDNPA has no other management plans and measures that it requests be part of the Construction Environmental Management Plan.

Action 19 – Outline LEMP to be provided at Deadline 4. Local Authorities requested discussions about its scope and early sight of drafts

- 3.3 The SDNPA has yet to have detailed discussions with the applicant on the LEMP. The SDNPA's view on what the LEMP should contain is set out below under action point 38 arising from the Hearing on 3 December.

4. Action Points from Hearing on 3 December

Action 4 – To provide a written summary to clearly articulate S106 requests in terms of the legal tests for S106

4.1 The SDNPA set out its heads of terms S106 requests in paragraph 3.66 of our Local Impact Report and this is replicated below, after some introductory commentary.

4.2 Paragraph 4.1.8 of the Overarching National Policy Statement for Energy (EN-1) states that:

The IPC may take into account any development consent obligations that an applicant agrees with local authorities. These must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects.

4.3 The heads of terms sought by the Authority in the table below are all considered to comply with these requirements because:

- i) They are all relevant to planning in their entirety.
- ii) They all respond to direct impacts of the proposed scheme and are required to make the development acceptable. Without these heads of terms the impact on hedgerows and trees in the National Park would be demonstrably harmful, the cultural heritage of the National Park would be harmed by works to the 'Persuasion' ancient coppice, the development would make no financial contribution toward archaeological archiving and management that is directly attributable to it (despite potentially making significant demands in this respect) and the SDNPA would not, as is usual practice, recover its costs in monitoring compliance with the legal agreement which is needed to make the development acceptable.
- iii) All heads of terms are directly related to the proposed development as they respond to issues directly caused by the proposal.
- iv) The heads of terms sought are considered to be proportionate and reasonable in all respects in relation to the proposed development
- v) Without the heads of terms sought the proposal would cause harm to hedgerows, trees, the cultural heritage of the National Park and local archaeological archiving. It is perfectly reasonable and desirable that a Section 106 legal agreement be used to mitigate these clear impacts of the development proposal.

Draft Head of Term Sought	Rationale
Improvement works to hedgerows within 5km of the proposed pipeline route. This could be undertaken by the applicant itself (to an agreed specification) or through a financial contribution in lieu.	At least 690 linear metres of hedgerow, most classified as important, would be removed by the proposal in the National Park. Although replacement planting is being undertaken there will be disturbance caused during the construction period and it will take many years for the hedgerow to re-establish itself to a similar state to the generally historic hedgerows being removed.
Improvement works (including new planting) to trees and woodland (including ancient woodland) within proximity of the proposed pipeline route. This could be undertaken by the applicant itself (to an agreed specification) or through a financial contribution in lieu.	To mitigate and compensate for works to trees, notable trees, works to trees subject to Tree Preservation Orders and for the loss of woodland. Trees will not re-establish themselves within 15 years and in some cases trees will be lost entirely given the 6m easement above the pipeline where replacement tree planting will not be possible and where other caveats in the REAC apply..

	There is currently no proposal from the applicant to compensate for the loss of these trees.
<p>Extension to the existing Jane Austen walk at Chawton House.</p> <p>Opportunity for the estate to extend the existing Jane Austen Walk to include the ancient coppice row referred to in <i>Persuasion</i>. The Jane Austen walk takes visitors to notable locations connected with her writings and her life. The ancient coppice row referred to in <i>Persuasion</i> is currently not frequently enjoyed by visitors and there is the opportunity to provide further interpretation about this feature in the landscape.</p>	<p>Significant works are being undertaken to this hedgerow and there is clearly a level of harm to the hedgerow caused by the works.</p> <p>An extension of the Jane Austen walk would accord with both the first and second statutory purposes of National Parks to, respectively, conserve and enhance cultural heritage and to promote opportunities for the public understanding and enjoyment of the special qualities of the Parks.</p>
<p>Archaeological archiving</p> <p>A financial contribution toward archaeological archiving and management.</p>	Suitable archaeological archiving provision needs to be secured by the applicant. There should also be appropriate financial recompense built into the archiving process, given major infrastructure projects of this kind often have a significant impact on archaeological archive stores, many of which are publicly funded.
<p>Monitoring</p> <p>A financial contribution toward the SDNPA's costs involved in monitoring and ensuring compliance with the heads of terms in the legal agreement.</p>	Not insubstantial officer time will be required in monitoring any legal agreement. As is usual practice, this should be reimbursed at cost.

Action 38 – SDNPA to provide details to the applicant of features that they consider should be included in a LEMP

- 4.4 The Authority supports the approach by the Examining Authority to request an outline Landscape and Ecological Management Plan (LEMP) be prepared now in order that it be subject to review, comment and examination and for the outline LEMP ultimately to be included in the Schedule 11 documentation for the DCO. The SDNPA has set out, at appendix one to this document, a suggested table of contents for this LEMP as requested by the Examining Authority. This is for discussion and as we move forward we will be liaising with the applicant and other relevant authorities on this, together with seeking confirmation that the LEMP will cover the full route of the pipeline through the National Park.
- 4.5 As it currently stands the SDNPA considers that the application's Landscape and Visual Impact Assessment baseline is incomplete due to the lack of information about the likely removal or retention of existing vegetation. Assessing the permanent impacts of the scheme from the loss of mature vegetation is problematic due to the lack of information presented and also the approach to mitigation which is set out in the DCO structure and the Environmental Statement.
- 4.6 Whilst the assessment is based on a 'worst case' scenario, which is in accordance with best practice, the SDNPA maintains that this worst case is not appropriately assessed or established. The assessment is then moderated by the application's Register of Environmental Actions and Commitments (REACS) which are themselves qualified. It

is simply not a robust assessment.

- 4.7 The sweeping powers to remove any vegetation in the vicinity of the scheme which the applicant seeks through Article 41 & 42 of the draft DCO provides further concern to the SDNPA that the proposed scheme to be delivered on the ground has not been adequately assessed and has hidden impacts which have not been accounted for and perhaps cannot be addressed within the current DCO structure and order limits.
- 4.8 Underlying this fundamental issue is the applicants' approach to mitigation which is set out both through design measures (REACS – which are heavily qualified) and also the Requirement 12 which is for the preparation of a LEMP. The Authority agrees with the concerns raised by the Examining Authority about the failure of the applicant to produce this document in draft.
- 4.9 The application's document reference REP2-045 LVI.18 refers to the content of the LEMP being restricted to Environmental Statement figure 7.5 (APP-061). This document sets out the areas for mitigation planting throughout the scheme including the 25 km of the pipeline route within the National Park. It is not clear how the applicant has determined that these areas require mitigation given that the removal of vegetation is a detailed design matter which the applicant does not have at the present time (LVI.17 response no 1.5). The Authority has not been party to these mitigation proposals and it is not clear how this scheme of mitigation would address the effects of the scheme and considers that this approach predetermines the production of vegetation removal drawings set out in the LEMP which would be considered normally to be the starting point for actual (versus in principle) mitigation proposals.
- 4.10 The SDNPA therefore currently considers that there are gaps in the proposed mitigation strategy as a result of;
- i) the limitations of the baseline,
 - ii) the caveats included in the proposed REACs,
 - iii) the sweeping powers applied for in Article 41 & 42 of the proposed DCO,
 - iv) the proposals for the LEMP to respond only to the areas of mitigation already identified on Drawing figure 7.5 of the ES (APP-61).
 - v) The lack of a process to respond to and mitigate for the real impacts of the scheme on the ground, given the restrictions of the order limits; the caveats in the REACS and the predetermined areas of mitigation identified in the Environmental Statement figure 7.5 (APP-061). No justification for these areas has been provided, however the LEMP currently appears to only to cover these areas which are additional to the working corridor width. The Authority is concerned that this limits the potential for the mitigation (replacement) of vegetation removal which cannot at this time be predicted.
- 4.11 The SDNPA considers that this is not an appropriate approach to assessing the likely landscape harm which has been previously identified in the SDNPA's Local Impact Report and Written Representation, namely:
- i) The scale of the project within the SDNP is extensive at approximately 75 hectares
 - ii) No quantity or area of likely vegetation removal has been provided
 - iii) Many of the REACS have 'where practical/ possible' caveat e.g. G91
 - iv) Lack of compensatory measures for those plantings which cannot be replaced due to easement or other operational measures and landowner agreement.
 - v) Lack of compensatory measures for the loss of mature vegetation which cannot be replaced in the 15 yr timescale.
 - vi) The applicant's Environment Investment Programme does not form part of

- vii) this application and cannot be relied on as part of the assessment process.
- viii) No commitment to replacement planting at an agreed ratio has been made by the applicant – for example the Woodland Trust’s replacement planting ratio.
- ix) No commitment to a ‘no net loss’ of trees/hedgerow as a minimum has been made.
- ix) The SDNPA considers that, if approved, and following implementation of the scheme that further areas of mitigation planting will be required in order to achieve the level of replacement planting/mitigation within the National Park that is claimed in the Environment Statement and that the applicant should set out a process for how this could be delivered as part of the DCO.

Action 40 – SDNPA to provide suggested wording for Requirement 12

- 4.12 The applicant committed, at the Hearings, to produce an outline LEMP for the scheme and to discuss this with stakeholders prior to this being tabled by the applicant at deadline 4. Given this commitment, and on the basis that the SDNPA (and other Local Planning Authorities) will get the chance to review and comment on this outline LEMP during the examination process the SDNPA recommend that the wording of the proposed DCO requirement number 12 be replaced with the following:

Landscape and Ecological Management Plan

12 (1) No stage of the authorised development must commence until a LEMP relating to that stage has been submitted to and approved by the relevant local planning authority.

(2) The LEMP must be substantially in accordance with the outline LEMP and must:

- (a) reflect the mitigation measures set out in the REAC;
- (b) contain details of landscape and ecological features to be retained;
- (c) contain vegetation retention, protection and removal drawings;
- (d) include an Arboricultural Impact Assessment;
- (e) contain details of working methods and operational mitigation measures;
- (f) contain details of replacement, mitigation and compensatory habitats and landscape features;
- (g) provide details of habitat management objectives and actions for each habitat;
- (h) provide details of new planting, including details of an aftercare and monitoring programme for a minimum of 5 years.

(3) The authorised development must be carried out in accordance with the approved LEMP.

- 4.13 The Authority also consider that, if requirement 12 is amended in line with the above, it would be desirable to amend the proposed DCO requirement number 8 in subsection (1) (a) to read as follows (italics indicate proposed changes);

- the *retention and* removal of all hedgerows and trees must be undertaken in accordance with the code of construction practice *and the landscape and ecological management plan as approved*

5. Action Points from Hearing on 4 December

- 5.1 There are no action points arising for SDNPA for deadline 3. Action 18 requires completion before deadline 4 and the SDNPA will liaise with the Highways Authority on this point.

6. Response to the applicant's Comments on Local Impact Reports document submitted at Deadline 2

Statutory Purposes of National Parks

- 6.1 The applicant submitted, at Deadline 2, their response to the Local Impact Reports prepared by County Councils, Borough and City Councils and the SDNPA. This is Application Document 8.7, Revision 1.0. In table 5.1 (first row) of this document, and in response to comments made by the SDNPA about the statutory purposes of the National Park, the applicant states:

National Policy Statement EN-1 states at paragraph 5.9.9 'The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC in deciding on applications for development consent in these areas', i.e. when taking decisions on DCO applications it is only conservation, and not enhancement, that should be given weight. The Applicant, therefore, considers that it is not under a duty to provide enhancement, indeed it cannot do so as part of the DCO since such enhancement would not be 'associated development'.

- 6.2 In response the SDNPA notes that the second sentence of paragraph 5.9.9 of National Policy Statement EN-1 explains:

Each of these designated areas [National Parks] has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decisions.

- 6.3 Further, as set out in paragraph 3.7 of our Local Impact Report, Section 62 of the Environment Act 1995 requires all relevant authorities to have regard to the statutory purposes of National Parks. The first statutory purpose of National Parks is to conserve *and* enhance the natural beauty, wildlife and cultural heritage of the area. The SDNPA have set out in our written representation submitted at deadline 2 that the applicant's proposals do not conserve the natural beauty of the National Park, much less enhance it. Whilst the applicant, as a private company, may not be covered by Section 62 the Planning Inspectorate, as a public body, are and are therefore required to have regard to the statutory purpose to conserve *and* enhance the natural beauty of the National Park when assessing the applicant's Development Consent Order application. Paragraph 5.9.9 of National Policy Statement EN-1 is also explicit that the Planning Inspectorate should have regard to the statutory purposes of National Parks. It is clear then that the SDNPA do not agree with the applicant's response in table 5.1 of their Application Document 8.7, Revision 1.0 submitted at Deadline 2.

South Downs Local Plan Policies

- 6.4 Row 3 of table 5.1 of the applicant's Application Document 8.7, Revision 1.0 submitted at Deadline 2 outlines that the basis for decision making under the Planning Act 2008 is that applications must be determined in accordance with the relevant National Policy Statement.
- 6.5 The SDNPA do not dispute this but note that the Planning Inspectorate's Advice Note One on Local Impact Reports sets out, on page 5, that topics which may be of

assistance to the Examining Authority include 'relevant development plan policies... and an appraisal of their relationship and relevance to the proposals'. This is simply what the Authority has done with its Local Impact Report and notes that, in any case, Local Plan policies are a material consideration in the determination of Development Consent Order applications.

Marker Post Locations

- 6.6 Row 4 of table 5.1 of the applicant's Application Document 8.7, Revision 1.0 submitted at Deadline 2 refers to the SDNPA's request, in its Local Impact Report, for an additional DCO requirement for the location of all marker posts to be submitted to and approved by the relevant planning authority. The applicant sets out that this would be inappropriate as marker posts are a safety requirement and must be placed to identify the pipeline's location. The applicant makes reference to standards for the location of pipeline markers as set out in the British Standards Institution code of practice for pipelines (PD 8010).
- 6.7 Having reviewed this document from the British Standards Institution the SDNPA are content that, were the applicant to follow these guidelines, the location of the marker posts would not be so harmful as to justify the refusal of Development Consent. However it is important to note that following the British Standards Institution code of practice is not currently secured in any way through the DCO process and, in the Authority's view, it should be.

Decommissioning

- 6.8 With reference to the penultimate row of table 5.1 of the applicant's Application Document 8.7, Revision 1.0 submitted at Deadline 2 the SDNPA remains of the view that in the event that the pipeline ceases to be operational all above ground infrastructure associated with the development should be removed and the land restored to its previous state. The intended operational life of the pipeline does not, in the SDNPA's view, in any way preclude such a requirement. Six months to remove above ground infrastructure was originally suggested by the SDNPA and the applicant indicates this would likely take longer. The SDNPA acknowledges this and would be prepared to accept, with reasoning, a longer period for compliance.

Appendix One – Draft Table of Contents for a Landscape and Ecological Management Plan (LEMP)

FOR DISCUSSION

1. Scheme overview

2. Scope of LEMP

3. Retained landscape and ecological features

- Vegetation retention and removal strategy
- Recording and preparation of vegetation removal drawings
- Retained habitats and landscape features description
- Arboricultural impact assessment (could be cross referenced)
- Arboricultural Works strategy (could be cross referenced)
- Arboricultural protection methodology (could be cross referenced)

4. Working Methods

- Works to retained trees – in accordance with:
 - BS3998 Recommendations' for tree work
 - BS4428 Code of practice for general landscape operations
 - BS5837 – tree protection (could be cross referenced)
- Method Statements for construction in specific areas ; (examples given below)
 - Chawton House – Registered parkscape – Ancient coppice (SDNP)
 - Ancient woodland method statement
- Compensatory measures during construction
 - E.g. Queen Elizabeth Park Locally Equipped Area for Play

5. Replacement /mitigation/compensatory Habitats and landscape features (not exhaustive)

- Mitigation principles
 - Replacement basis
 - Ratio of tree size to replacement number (Woodland Trust?)
 - Compensation strategy where mitigation cannot be achieved within the order limits
- Replacement /mitigation/compensatory priority habitats
 - Lowland deciduous woodland and hedgerows*
 - Ponds & wetlands*
- Replacement /mitigation/compensatory landscape features
 - Wet ditches*
 - Dry ditches & surface water attenuation*
 - Scrub and woodland planting*
 - Hedgerows*
- Replacement /mitigation/compensatory features for protected species

Bat boxes
Hibernaculum

- New Plantings

Aftercare and establishment works are to be carried out by an approved landscape contractor in accordance with good horticultural practice or the current British Standard with reference to:

- BS4428 Code of practice for general landscape operations
- BS8545 Trees from nursery to independence in the landscape

- New features – Maintenance of Ditches, ponds, new habitats, fencing, boundaries,

6. Aftercare

- Description of establishment maintenance operations years 1-5
 - Maintain optimum ground conditions
 - Monitor Pests & disease
 - Monitor damage & removal/ browsing
 - Replace/repair guards & any protective measures
- Replacement plantings yrs 1-5
 - Review of failure, species, location, conditions for new plantings
 - Failure of existing retained trees, woodland and hedgerows
 - Extension of aftercare period for replacement plantings
 - Other remedial works

7. Operational mitigation measures

Light, noise, dust,
Spoil & soil storage
Invasive non-native species (INNS)

8. Monitoring and review

Years 1-5
Programme of inspection
Annual ecological walkover survey
Interim Final inspection (original plantings)
Programme of inspection (beat up plantings)
Final inspection
Final ecological inspection
Handover & Long term management objectives

Appendices

Vegetation retention and removal drawings
Arboricultural impact assessment drawings
Arboricultural & vegetation protection drawings

Replacement planting, mitigation and compensation proposals drawings

Replacement boundary and surfacing proposals drawings

Description of habitat management objectives and actions for each habitat

Management Objectives

Management prescriptions