



Essex County Council

Andrew Mahon
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

Sent via e-mail only:

bramfordtotwinstead@planninginspectorate.gov.uk

Our ref: ECC/B2T/Rule6

Your Ref:

Date: 17th August 2023

Dear Mr Mahon

Planning Act 2008 (as amended) – Sections 88 and 89 The Infrastructure Planning (Examination Procedure) Rules 2010 – Rules 4, 6, 9 and 13

Application by National Grid Electricity Transmission plc for an Order granting Development Consent for the Bramford to Twinstead Reinforcement Notice of appointment of Examining Authority, invitation to the Preliminary Meeting, notification of Hearings and Procedural Decisions

Essex County Council (ECC) would like to write in response to the Planning Inspectorates Rule 6 letter, dated 07 August 2023 for the above project. ECC has registered to attend the as scheduled Preliminary Meeting on Tuesday 12th September 2023, has been given the unique reference number 20041299, and will do so in person at the Sir Bobby Robson Suite, Ipswich Town Football Club, Portman Road, Ipswich IP1 2DA.

ECC has already submitted its Relevant Representations on this DCO Proposal, hence it's views on the DCO are known as a matter of public record. In addition, ECC is currently preparing, in conjunction with Braintree District Council, a Local Impact Report which will be with the Planning Inspectorate by the due date.

The issues we would like to raise will be on Item 3 "Initial Assessment of Principal Issues" on the agenda, namely:

- ECC are of the view that the Examining Authority (ExA) should give consideration to the impact the as proposed development will have on

business's during construction of the development, and not solely on impacts should the development be Consented and completed. ECC therefore request that this issue be included in Annexe C.

- ECC is committed to ensure that the impact of the development as here proposed are sufficiently mitigated and a lasting legacy provided. This includes the consideration being given to decommissioning and removing overhead line(s) which become redundant as a direct result of the project (both inside and outside of the Order Limits). While a large section of 132kV line is to be removed, there is one section of 132kV overhead line outside of the Order Limits which is not to be removed is between the proposed Grid Supply Point and the Twinstead Tee. It is therefore requested that impacts of retaining redundant lines be included on the list of issues in Annexe C for completeness. This is in common with the views as will be expressed by Braintree Council.
- ECC considers that climate change is an integral consideration to this DCO. Hence consideration should be given to the likely effects the proposal would have on climate, and the vulnerability of the project to climate change. It is not apparent that climate is considered in the list of principle issues. It is requested that impacts on climate therefore be included on the list of issues in Annexe C for completeness.
- ECC notes that tourism impact was Scoped out of the EIA. Nevertheless, tourism impacts, especially during the construction phase, are not included in this initial assessment. The Council has seen the comments as will be made to the ExA on this subject from Suffolk CC and supports their comments and the rationale behind asking that this is included. The Stour Valley AONB also extends into Essex and the impacts on tourism apply along the route of this DCO.
- In terms of the Examination Timetable, it is noted that the timetable for responding to the ExA's written questions during the Hearing are very tight. As PINS will know Essex is currently asked to attend two Hearings on separate proposals, as well as progressing to Hearing a large number of other NSIP projects, which will place significant pressures on Essex in terms of resources. In particular, we note that the ExA's second written questions, which are proposed to be published 22 December 2023, comes within the holiday season when seasonal bank holidays are a factor, which together with the understandable wish of staff to take a break from heavy workloads, should be factored in to allow appropriate time to respond by, for example, giving an additional period of 7 days to respond.

ECC have no other specific issues to raise at this time but by being in the Preliminary Meeting room we wish to listen to the matters as may be raised to respond verbally if a response is considered beneficial to the ExA.

As for ECC's comments on the blended approach taken by the ExA at the proposed Hearing dates we support this approach as it enables a variety of options for interested parties to attend the as proposed sessions and is an approach common with other DCO Hearings.

Yours sincerely

Mark Woodger [signature]

Mark Woodger

Principal Planner, National Strategic Infrastructure Projects

 [@essex.gov.uk](mailto:mark.woodger@essex.gov.uk)