



Bramford – Twinstead:

Deadline 2 Response

Braintree District Council (20041141) &

Essex County Council (20041299)

PINS REFERENCE: EN020002

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1 Glossary of Acronyms and Abbreviations

ASI – Accompanied Site Visit

AIA – Arboricultural Impact Assessment

BDC- Braintree District Council

BNG – Biodiversity Net Gain

B2T – Bramford to Twinstead

dDCO – Draft Development Consent Order

ECC – Essex County Council

ExA – Examining Authority

GSP – Grid Supply Point

NG – National Grid

NSR – Noise Sensitive Receptor

OWIS – Outline Written Scheme of Investigation

PRoW – Public Right of Way

REAC – Register of Environmental Actions and Commitments

UKPN – United Kingdom Power Networks

2 Purpose Of Submission

2.1 Introduction & Format

2.1.1 The purpose of this submission is to respond to materials submitted / comments required in advance of Deadline 2 of the Rule 8 letter (Reference PD-003 in the examination library):

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020002/EN020002-000761-BTTR%20-%20Rule%208%20Letter%20230919.pdf>

2.1.2 The structure of this response explores the relevant points from the Rule 8 Letter to respond as necessary to the Examining Authority (ExA). All relevant headings have the corresponding document number, which can be found within the Examination Library on the Planning Inspectorate Website:

<https://infrastructure.planninginspectorate.gov.uk/projects/easter/n/bramford-to-twinstead/>

2.1.3 This response is jointly prepared by BDC and ECC and here forth will be referred to as ‘The Council’s’. Any differences of opinion between The Councils will be explicitly labelled as such.

3 Comments on the Applicant’s Draft Itinerary for an Accompanied Site Inspection (ASI) {REP1-026}

3.1 Overview

3.1.1 [REP1-026] Document 8.3.4 sets out 12 site visit locations for the accompanied site inspection (ASI). This section comments on the suggested viewpoints and the accompanied site visit more generally.

- 3.1.2 The Councils note that Essex is at the end of the route; now that nights are drawing in, it may leave insufficient time to see all of the site in daylight. As such, the Councils propose the ASI is split with those in Essex taking place the following day.
- 3.1.3 The Councils also note that the Draft Itinerary proposed by the Applicant has excluded most Public Rights of Way as locations due to these being publicly accessible and therefore deemed suitable for further unaccompanied site visits. If the proposed itinerary is followed as currently suggested, the Councils urge ExA to visit all the LVIA assessment viewpoints on the PRow network unaccompanied, as a minimum, in order to fully understand the potential long-term visual effects on recreational and other rural receptors and on the local landscape character.
- 3.1.4 The Councils welcome Unaccompanied Site Inspection 4 (USI4) undertaken by the ExA on 13 September 2023 and the accompanying note [EV-020]. However, having reviewed USI4 and EV-020, it is not entirely clear that Appendix 6.4 (background baseline information etc) [APP-106 and APP-107] was used in the field by ExA alongside photomontages of the relevant viewpoints (APP-063 to APP-065). Clarification is therefore requested in this regard. For the avoidance of doubt, the Council's consider that Appendix 6.4 must be read in conjunction with any site visit to inform a detailed understanding of LVIA issues.

3.2 Additional Location Points Needed

- 3.2.1 There is no location point to view the proposed haul route from the A131 to the Stour Valley West Cable Sealing End Compound; Location 12 is the closest and that would not give an adequate view of the haul route location. The Councils therefore request that an additional Location Point is added to the itinerary to cover the proposed haul route near the entrance from the A131 as this would not be fully visible from any public right of way.
- 3.2.2 The Council's also ask that the ExA consider whether an additional location should be included to view the existing 132kV line which is to be retained

between the Twinstead Tee and the proposed GSP Substation. The purpose of this would be for the ExA to come to their own view about the landscape benefits of the 132kV line removal, as set out in The Council's Local Impact Reports, and which would be made redundant as a result of the proposals, and which the Council's see as being necessary.

3.2.3 The Council notes specific reference is made in USI1 and USI2 [EV-001] from July 2023 that viewpoints HV01, AB20, AB10, CO8, and F2, all within Suffolk County Council's boundaries, were previously visited. Can ExA clarify which viewpoints within Braintree District Council's boundaries have also been visited?

3.2.4 The Council proposes that the following viewpoints should be visited, if not already done so, in order to understand the scale of the adverse landscape and visual effects within Braintree District Council's boundaries: G18, G35, and G07 as shown on [PDA-001] Document 5.8 Photomontages, Appendix 2 Sheet 5.

4 Responses to Comments on Relevant Representations [REP1-025]

4.1 Overview

4.1.1 [REP1-025] Document 8.3.3, Table 3.3 contains the Applicants response to matters raised by BDC and ECC at the Relevant Representations stage [RR-002 in the Document Library]. The Council's would take this opportunity to comment on the following matters contained within [REP1-025] Document 8.3.3, Table 3.3 as appropriate. The Councils will also respond to select Thematic comments as appropriate.

4.2 Key Issue – Archaeological Mitigation (page 74).

4.2.1 The Applicants response does not fully address the issues raised, specifically the Outline Written Scheme of Investigation (OWSI) (Document 7.10 APP-187) and the Register of Environmental Actions and Commitments (REAC) [APP-179].

4.2.2 The OWSI will be directly referenced in the DCO under Requirement 6 and therefore it is paramount that it is approved early in the examination process. This will need updating in order to facilitate an appropriate response to mitigation and to address our comments and recommendations made within the LIR.

4.2.3 An additional requirement within the Register of Environmental Actions and Commitments (REAC) [APP-179] was recommended in the LIR to secure appropriate mitigation of archaeological remains that will be adversely impacted by the proposals and to integrate the archaeological process into the overall programme of environmental mitigation.

4.3 Key Issue - Redundant 132kV Overhead Line (Page 73)

4.3.1 It is acknowledged that at G53 in APP-043, it does say that the removal of the 132kV line between the Twinstead Tee and the proposed Grid Supply Point (GSP) substation is not needed. However, it does not say that this section of line is in any way retained for future use if B2T is consented. Indeed, the UKPN letter attached to The Councils LIR [REP1-039] (Appendix 2) essentially confirms this.

4.3.2 The Council's position is that this section of 132kV line should be included as part of the development, owing to the fact that the development if approved, would render it redundant, leaving a piece of unused infrastructure which is harmful to local landscape character. The Council's deliberations on the landscape benefits of removing this section of line is set out in paragraphs 7.6.3 – 7.6.8 of the Councils LIR [REP1-039] and is not repeated here to avoid repetition.

4.4 Key Issue - Environmental Impact of Temporary Accesses (Page 76)

4.4.1 The Council's remain concerned about the amount of vegetation to be removed along the A131 to form the temporary access to the Haul Route. [APP-183] Document 7.8.2, sheet 32, shows that a large swathe of vegetation requires permanent removal to facilitate access to the bellmouth, while the remaining areas of hedge either side of the bellmouth are to be

coppiced. It is unclear however whether further coppicing would be required to the hedge in order to provide suitable visibility splays for the access, given that the road is national speed limit in this section.

4.4.2 Furthermore, it is unclear whether the proposed ghosted right hand turn lane will necessitate further permanent removal of hedge on either side of the road. The Council's concerns about the right-hand turn lane are set out in Paragraph 15.8.4 of the joint Councils LIR [REP1-039].

4.4.3 It is acknowledged that the removed vegetation for the access bellmouth would be replaced at the end of the construction period [App-184] Document 7.8.3, while the coppiced hedgerows are anticipated to regrow over time. These plans should however be updated should any additional removal and replacement be required as a result of visibility splays or the right-hand turn lane.

4.5 Key Issue - Public Rights of Way (PRoW) (Page 77)

4.5.1 [REP1-025] - The Council's note the applicant commitment within Table 2.25: Public Rights of Way of their intent to not permanently stop up any PRoW and keep the temporary closure of the same down to a minimum, keeping it open with appropriate management where possible, this being within Chapter 6 of the CTMP [APP-180]. This also include mitigation works to preserve the use of the Hadleigh Railway Walk which although well used by cyclists and walkers but does not form part of the adopted highway network.

4.6 Key Issue - Working Hours (Page 77)

4.6.1 The Council's note comments from the Applicant within Table 2.18 of Document REP1-025 which seek to justify the long working hours sought.

4.6.2 The reasons can be summarised as:

Reliance on a series of pre-programmed electrical outages to deliver the project, which are understood to have to be programmed far in advance – therefore longer working hours are

required to reduce the risk that these outage periods will not be missed

Enable connection of multiple contracted generation customers (while not explicitly stated, it is The Councils understanding that if a contracted connection cannot be provided, then significant financial compensation can be sought by the customer)

Support Government Net Zero Ambitions and meet licence obligations

Allow for flexibility for contactors workforce, once appointed

- 4.6.3 The reasons put forward by the Applicant are noted and understood, however, these reasons must also be balanced against the amenity of Noise Sensitive Receptors (NSR's) along the construction route, who need to be protected as far as possible during the construction period.
- 4.6.4 The Councils remain of the view that the proposed working hours are excessive and unreasonable for NSR's, especially owing to the anticipated 4-year construction programme. In particular, long working hours on Saturday afternoons, Sundays and Bank Holidays should be avoided as much as possible to enable the retention of the peace and tranquillity of this predominantly rural area and the benefit of the amenity of those living close to the development site, or traffic routes leading thereto, including but not limited to the movement of HGV's and/or Abnormal roads. Nighttime working also remains a concern and requires further exploration by the ExA.
- 4.6.5 The Councils detailed concerns about working hours are set out in the Local Impact Report [REP1-039], Paragraphs 17.4.5 – 17.4.9.
- 4.6.6 The Councils suggest that the ExA explore alternative working hours with the Applicant, which are more in line with standard times suggested in the LIR, but perhaps extended in the least sensitive times, as well as requiring the Applicant to sequence works as far as possible to avoid working outside of the core hours.

4.7 Key Issue - Socio Economic and Tourism (Page 77)

4.7.1 It is correct that Socio Economic impacts were Scoped out within the original assessment, along with tourism. The Councils, as well as those in Suffolk, consider this particularly disappointing given the value of employment opportunities post Covid are at an understandable high, and that tourism is a major contributor to the economic wellbeing of this rural location.

4.7.2 What is also particularly disappointing is that Essex and the East Anglian region have a number of significant NSIP projects, and major growth proposals, which will all impact the availability of a suitably qualified and available workforce from within the local area leading we anticipate to workforce shortages going forward. Skills as needed here will be transferable between a large variety of projects, and the impacts cumulatively of multiple projects will be significant. The potential impacts of the same are, as the applicant identifies, embedded into EN-1 and by not exploring this impact and proposing methods to negate the potential harm this could have on local jobs and skills, local suppliers and the supply chain, this remains unproven.

4.7.3 The applicant makes no commitment as to where the workforce will come from, other than the assumption that they will be UK based at this time, or that it will be contractor dependant, which is not the appropriate test. It is noted that on site employment would fluctuate during the build programme of this development, but without commitment to use local workforce it is considered to be a missed opportunity. Whilst some of the construction skills needed would be specialist in nature, some of it would not.

4.7.4 The Councils are also aware of the Norwich to Tilbury DCO project which requires similar skills to those here, and enabling the local workforce to be trained in such would lead to a significant legacy as many of the skills needed would be transferable between projects and significantly upskill economically active local people.

4.8 Key Issue - Community Benefits (page 78)

4.8.1 All Host Authorities are currently finalising their shared ask for community benefits to offset and mitigate the impact of this development, and to provide a lasting local legacy going forward.

4.9 Key Issue – Noise and Vibration Impacts of Temporary Access (Page 77)

4.9.1 NG state in Table 3.3 of REP1-025 that Chapter 14 Noise and Vibration [APP-082] of the EIA includes a consideration of the noise emissions from the temporary access route off the A131. However, no specific noise emission predictions have been undertaken. BDC would like to see some noise contour plots showing the propagation of noise from the temporary access route off the A131, with an assessment of the potential effect on the surrounding noise sensitive receptors.

4.10 Key Issue - dDCO (page 78-82)

4.10.1 The Councils have set out a number of detailed comments in the joint ECC/BDC LIR [REP1-039] on the matters raised in section 3.3 of doc 8.3.3 Applicants comments on relevant representations. The Examining Authority is referred to the joint LIR in the first instance, but some additional comments are provided below:

4.10.2 **Relevant/Necessary Requirements;** NG has stated that Schedule 3 dDCO contains all the Requirements which the Applicant considers are necessary and appropriate in the context of the project; DCO Advice Note 15 states that Requirements should be precise enforceable, necessary and relevant to planning and reasonable in all other respects. ECC/BDC joint LIR [REP1-039] highlights at para 21.5.10 that consideration should be given to including additional Requirements to cover matters listed. To the extent that regulation of these additional matters is not adequately secured/ and any breach enforceable via the LEMP, CEMP, MWLP and CTMP the position remains as set out in the ECC/BDC joint LIR.

4.10.3 **Definition of ‘Commencement’;** DCO Advice note 15 para 3.6.15 notes that ‘works within the definition of pre-commencement operations are either de minimis or have minimal potential for adverse impacts’. The Council’s

consider that as drafted the scope of pre-commencement operations is wide and more than de minimis, including some potentially significant works such as the haul routes etc - see joint ECC/BDC LIR [REP1-039] paras 21.2.2 onwards. Moreover, the detail of the proposal including pre-commencement operations will not be finalised until after confirmation of the DCO.

- 4.10.4 **Materially new or materially different environmental effects;** It is noted that the applicant has undertaken its environmental assessment on a reasonable worst-case basis. See comments made by The Council's [REP1-039] at para 21.2.5 LIR. There is no specificity about who decides whether there are materially new/different environmental effects. A lot of the detail of the various designs cannot be determined until a works contractor has been appointed so changes in design remains a real possibility. In The Council's view the relevant Local Planning Authority should have responsibility for determining whether any variation gives rise materially new effects.
- 4.10.5 **Delivery and Decommission** - See comments at para 21.3.1 of the Joint Council's LIR [REP1-039]. Whilst the intentions of NG are noted, The GSP has not yet been built and 132kv overhead line (to be removed) is controlled by UKPN which creates uncertainties. The Council's seek some assurance that in circumstances where the scheme is not fully completed, obsolete/redundant structures/works will be removed as proposed.
- 4.10.6 **The limits of deviation** See comments at para 21.3.3 The Council's joint LIR [REP1-039].
- 4.10.7 **Stopping up of streets and PROW, construction, altering and maintaining streets and regulating traffic** - It is noted and welcome that NG proposes to enter into a framework highways agreement with highways authorities including ECC to regulate powers they will derive under the relevant articles. Until agreement is reached however, The Council's reserve their position in this regard - see comments made in their LIR [REP1-039] para 21.3.4 onwards.
- 4.10.8 **Felling or lopping;** The Explanatory memorandum ref APP-035 para 3.52.1 notes that Article 48 allows any tree, shrub, hedgerow or important hedgerow

that is under or within or near any part of the authorised development to be felled, lopped, pruned, cut, trimmed, coppiced, pollarded, reduced in height or width, or to have its roots cut back, if it is considered to obstruct the construction, operation or maintenance of the project or endanger anyone constructing, maintaining or operating it. This is necessary so that the authorised development can be brought forward expediently and safely and can be maintained in the same manner, noting in particular the need to ensure that minimum standard electrical safety clearances are maintained on an ongoing basis. The use of the word ‘near’ is wide and vague in this context; the Council’s request that the text at Art 48 is amended to add *‘having regard to minimum standard electrical safety clearances.*

- 4.10.9 **Requirement 7 construction hours** – see The Councils comments in heading 4.6 above.
- 4.10.10 **Requirement 10 implementation and maintenance of reinstatement planting;** this is a nationally significant scheme with significant impacts. It would be appropriate to extend the maintenance period for reinstatement planting to ensure adequate mitigations are delivered, with a minimum period of 10 years being considered necessary, appropriate to the development here proposed, precise and enforceable, as stated in The Councils [REP1-039] at Para 21.5.1.
- 4.10.11 **Requirement 13 BNG** - As drafted there is no detail provided about what BNG is proposed nor how it will be managed—all in the context of emerging national guidance. See comments at The Councils joint LIR [REP1-039] para 21.5.8. The Councils do not consider Requirement 13 as drafted is adequate.
- 4.10.12 **Discharge consents timing and fees** - Explanatory memorandum para 4.4.2 states that National Grid considers that shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the project is intended to address. The Councils welcome the development of a PPA which it is hoped will cover both timings and the issue of fees. The suggestion of pre-application ‘shadow’ submissions ahead of formal applications is worth discussing further provided it does not result in

a duplication of discharging authority effort for a single fee. In the meantime, the Councils reiterate comments it has made in the joint LIR [REP1-039] para 21.6.1 onwards to the effect that a 28-day period is insufficient and the proposed fees are inadequate to cover the discharging authorities costs.

4.11 Thematic Comment 8 – Impacts on East Anglia (Section 2.9 of REP1-025)

4.11.1 In relation to mitigation for overhead lines, The Council's position is that 50m high pylons and overhead lines are very hard to mitigate with traditional planting due to their height and industrial nature. BDC draws attention to the draft Overarching National Policy Statement for Energy (EN-1) (March 2023) which identifies in para 4.15 that '*In considering any proposed development... the Secretary of State should take into account...its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy*'. (The Councils' emphasis)

4.11.2 The Councils' position is that, should the project go ahead as proposed, long-term adverse landscape and visual effects, including significant ones, will take place that cannot be mitigated through landscape planting due to the height and character of the infrastructure, and that therefore a significant landscape and visual compensation package should be drawn up by the applicant in association with the relevant Councils and their key environmental partners, which is over and above the 'softening' measures already suggested, the biodiversity net gains to be provided and distinct from any discussions of community benefits.

4.11.3 While EN-1 2023 is in draft form, Section 105 of the Planning Act 2008 sets out what the Secretary of State must have regard to in making his or her decision where a relevant NPS is not designated. This includes any matter that the Secretary of State thinks is important and relevant to the Secretary of State's decision. This could include a draft NPS, if one exists. As such, the Councils consider that draft EN-1 should be given some weight in decision

making on this development, given it contains matters important and relevant to the decision.

4.12 Thematic Comment 11: Options and Routing – Section G Stour Valley
(Section 2.12 of REP1-025)

- 4.12.1 The Councils welcome the additional undergrounding proposed in the Stour Valley. However, the Councils remain concerned that the landscape and visual effects of the Stour Valley East Sealing End Compound have not been fully considered at the local level with the assessment point (VPG2.5) some distance from the facility. The experience of sensitive receptors using the PRow network close by does not appear to be fully considered. The Councils would like to see further assessment carried out from the PRow network closer to the facility in order to demonstrate the effectiveness of the proposed mitigation and/or compensation.
- 4.12.2 An additional viewpoint assessment should also be considered close to the construction route, such as from St Edmund's Way, where it crosses the underground cable line close to the junction with the Stour Valley Path, west of Henny Road and east of Hill House Farm, as landscape and visual effects could be substantial here during construction.
- 4.12.3 Similarly, it is unclear why the photomontage (VPH07/G18 View from Rectory Lane on edge of Wickham St Paul) has been done c800m away from the Grid Supply Point substation as this could have been done from VPH09 which is much closer to the proposed installation and provides greater clarity on the effectiveness or not of the proposed planting.
- 4.12.4 There are also no appropriate landscape and visual assessments taken from the PRow network east of the Grid Supply Point Substation. VPH05 is offset from views to the Grid Supply Point Substation so cannot be used to demonstrate the effectiveness or not of proposed mitigation/compensation. Additional assessment is required.

5 Comments on any other Submissions received at Deadline 1

5.1 Content of Submissions

5.1.1 The Covering Letter (REP1-001) Document 8.3.1 sets out the updated/new documents which have been submitted. Of particular note is [REP1-036] Document 8.3.11 – ecology survey from haul route, and [REP1-11] Document 5.10 Arboricultural Impact Updated from haul route from A131.

5.1.2 The additional information also includes (REP1-021) Document 8.2.1 – preliminary meeting action and (REP1-023) Document 8.2.2 – Response to Temporary Access Road Queries from A131, including additional survey data.

5.2 Comments on Additional Data Related to A131 Temporary Haul Route

5.2.1 The additional ecological survey information contained in (REP1-023) Document 8.2.2 is considered appropriate and sufficient to identify any likely impacts from the temporary haul route. As the baseline is arable land of low ecological value with a confirmed absence of invasive non-native species, there is no change to the habitat assessment in ES Chapter 7: Biodiversity [APP-075]. In relation to protected species, there is no need for changes in the ES for Dormouse (presumed presence), Otter & Water Vole (worst case scenario) or for Letters of No Impediment from Natural England for the draft bat licence (APP-118) and badger licence (APP-123/124).

5.2.2 The Councils are therefore satisfied that no further ecology surveys are needed for the temporary access route off the A131, other than the pre-construction surveys that would be undertaken across the whole project to supplement the baseline information currently collected for the European Protected Species mitigation licences. These are noted in paragraph 2.5.4 of the LEMP (APP-182), which would be secured by Requirement 4 of the draft Development Consent Order (APP-034).

5.2.3 The updated arboricultural survey (REP1-011) of the temporary haul access route identified two veteran oak trees (irreplaceable habitat) located in the field boundary between Oak Road and Lorkins Lane. As these features lie

outside of the Order Limits, The Councils are satisfied that that no further arboricultural surveys are needed for the temporary access route off the A131, however a suitable tree protection plan will be required to ensure that the veteran trees, and all other trees to be retained, are protected during construction.

5.2.4 The information collected during the survey will be added to the figures in LEMP Appendix A at an appropriate deadline. However, the updated AIA (REP1-011) Document 5.10 (B) states that it would be used to inform the detailed design to avoid trees of higher grade, where practicable. The new UK Bat Mitigation Guidelines (Reason & Wray 2023) requires compensation for any loss of bat roost resource in advance of tree removal and works need to take place under a Precautionary Working Method Statement. Any additional potential roost assessment of trees for bats will also need to be in accordance with the newly published 4th Ed. Bat Survey Guidelines for Professional Ecologists (Collins ed, 2023).

5.3 Comments on any other information including any further clarification provided by the Applicant at the hearings

5.3.1 The Applicant provided comments on the Limits of Deviation at Issue Specific Hearing 1. This is contained within [REP1-034] Document 8.3.9.

5.3.2 Specifically with regards to Limits of Deviation, the flexibility to extend the maximum pylon height upwards by 4 metres could have significant impacts on the setting of heritage assets nearby. This is discussed further in Paragraph 21.3.3 of The Council's Local Impact Report [REP-039] and is not repeated here.

5.3.3 An additional suggestion which has been put forward by The Council's Heritage Consultant is whether an 'Additional Impact Statement' (or similar) could be submitted by way of a requirement, should a pylon over the standard 62.23m height be required? Perhaps there could be some qualifying criteria, such as when a pylon is within 500m of a heritage asset? This is something that The Council's request the ExA explore further with the

Applicant to see if any additional layers of protection for heritage assets can be added.

5.3.4 The Councils have no further comments to add at this time to any other post hearing submission.