



Application by National Grid Electricity Transmission Plc for the Bramford to Twinstead Reinforcement

The Examining Authority's first written questions Issued on 13 October 2023

The following table sets out the Examining Authority's (ExA's) first written questions (ExQ1).

Responses are due by Deadline 3 in the Examination Timetable, which is **Tuesday 31 October 2023 at 11.59pm**.

The list of questions is set out in a topic-based framework, which is generally based on the ExA's Initial Assessment of Principal Issues provided as Annex C to the ExA's Rule 6 letter of 7 August 2023. The framework of issues set out there has been developed in accordance with matters that have arisen from representations. The answers provided will contribute to the ExA's examination and assessment of the application against relevant policy.

Column 1 of the table provides a unique reference number for each question. This starts with a topic code, then a '1' (for ExQ1), followed by a section number (for that topic), and finally an individual question number. When answering a question, or in any future representations, please ensure that you quote this unique reference number.

Column 2 indicates the party (or parties) that the question is directed to. The ExA requests all named parties to answer all questions directed to them, providing either a clear and suitably substantive response, or reasons why the question cannot be answered or is not relevant to them. This does not preclude an answer being provided by any other party, if that party believes they have additional information on that specific topic or point that would be useful to the Examination.

If you are answering a limited number of questions, responses in a letter format are appropriate. If you are answering several or many questions, it will assist the ExA if you use a table based on that set out below. An editable version of this table in Microsoft Word is available from the Planning Inspectorate. Please email your request to the case team at bramfordtotwinstead@planninginspectorate.gov.uk and include 'Editable ExQ1 Table' in the subject line of your email.

The Examination Timetable makes provision for the ExA to issue a further round of written questions in due course. If this is required, the further questions will be referred to as ExQ2.



Frequently used abbreviations

AONB	Area of Outstanding Natural Beauty	LIR	Local Impact Report
BoR	Book of Reference	NPPF	National Planning Policy Framework
CA	Compulsory Acquisition	NPS	National Policy Statement
CC	County Council	NSIP	Nationally Significant Infrastructure Project
CEMP	Construction Environmental Management Plan	PA2008	The Planning Act 2008
CoCP	Code of Construction Practice	PC	Parish Council
CTMP	Construction Traffic Management Plan	REAC	Register of Environmental Actions and Commitments
DC	District Council	RR	Relevant Representation
dDCO	Draft DCO	SI	Statutory Instrument
EM	Explanatory Memorandum	SoR	Statement of Reasons
ES	Environmental Statement	SoS	Secretary of State
ExA	Examining Authority	SSSI	Site of Special Scientific Interest
HDD	Horizontal directional drilling	TP	Temporary Possession
LEMP	Landscape and Ecological Management Plan		

The Examination Library

References in these questions set out in square brackets (e.g., '[APP-010]') are to documents catalogued in the Examination Library. The Examination Library will be updated as the Examination progresses. Please include the Examination Library unique reference when referring to any document in your reply.

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8. Historic environment			
HE1.8.1	Historic England Babergh DC Mid Suffolk DC Suffolk CC	Are you content with the study areas used for the historic environment baseline studies (paragraph 8.4.5 ff, ES Chapter 8 [APP-076])?	We have focused on Hintlesham Hall for the purposes of our advice so defer to Babergh DC, Mid Suffolk DC and Suffolk CC on this question.
HE1.8.2	Historic England Babergh DC Mid Suffolk DC Suffolk CC	The assessment of effects on settings in ES Chapter 8 [APP-076] (paragraphs 8.1.6, 8.4.11, 8.4.17, 8.4.22, etc) seems to rely on intervisibility between the Proposed Development and potential historic environment receptors. Do you understand that to be the case, and, if so, are you content with the approach?	<p>There is a lot of emphasis on the Zone of Theoretical Visibility (ZTV). The intervisibility between the Proposed Development and potential historic environment receptors will form part of the assessment but the assessment should not rely on this.</p> <p>As detailed in the glossary of the NPPF setting of a heritage asset is; <i>“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”</i></p> <p>While ES Chapter 8 does seem to rely on intervisibility we are satisfied that ES Appendix 8.2 – Annex A Hintlesham Hall Assessment does assess other aspects of the setting of Hintlesham Hall’s setting such as character and context.</p>
HE1.8.3	Historic England	If not covered in your Written Representation, can you elaborate on your specific concerns in relation to the cable sealing end compound close to the Polstead Conservation Area [RR-036].	<p>We no longer have concerns relating to the cable sealing end compound close to the Polstead Conservation Area.</p> <p>The Dedham Vale East CSE compound was moved approximately 1km further away from its original location and was placed between two blocks of woodland to</p>

Reference	Question to:	Question	
			screen the site in response to Historic England's feedback.
HE1.8.9	Historic England Babergh DC Mid Suffolk DC Suffolk CC The Suffolk Preservation Society	<p>A number of parties have raised issues in relation to effects on the Grade I listed Hintlesham Hall and the associated listed buildings. The Applicant's proposals here are said to be based on the micrositing of towers agreed with Historic England prior to the project being put on hold in 2013, but the proposed Limits of Deviation proposed would allow pylons to vary from the indicative agreed positions.</p> <p>Do you consider this approach acceptable in the area within the setting of Hintlesham Hall?</p> <p>Are there any implications in relation to avoidable harm to Hintlesham Hall?</p> <p>Can you confirm if there is a specific area, component or extent of the proposed Limits of Deviation that is of concern, and any harm you consider could arise.</p> <p>Should any changes or deviation be restricted to those agreed by the relevant local planning authority and Historic England?</p> <p>Paragraph 8.11.6 of the ES [APP-076] addresses the sensitivity testing that was carried out in relation to pylon locations and alignment and concludes that, '<i>the pylons could be located anywhere within the parameters of the LoD (including the vertical LoD) without resulting in significant effects to heritage assets.</i>' Do you agree with this conclusion?</p> <p>Is the sensitivity testing and conclusion further described in the Applicant's Hintlesham Hall Assessment [APP-128] sufficiently evidenced, and do you agree with the conclusion?</p>	<p>We expressed concerns in our Written Representation regarding the Limits of Deviation around Hintlesham Hall. We do not think the limits of deviation and potential changes to the positions of pylons RB3 and RB4 have been fully taken into account. We have concerns that the limits of deviation could result in avoidable harm to the significance of Hintlesham Hall.</p> <p>Our concerns relate specifically to the siting of pylons RB8 and RB9. If they were moved they would be in a key view from the stable block of Hintlesham Hall (shown in viewpoint HV01). We consider this would increase the level of harm considerably and would be avoidable.</p> <p>We would therefore like to see additional measures added to protect the view out from the stable block of Hintlesham Hall (shown in viewpoint HV01) and prevent the relocation of pylons RB8 and RB9.</p> <p>We would agree that any changes or deviation should be restricted a way to achieve this as suggested would be to seek agreement from the relevant local planning authority and Historic England?</p> <p>Paragraph 8.11.6 of the ES [APP-076] addresses the sensitivity testing that was carried out in relation to pylon locations and alignment and concludes that, '<i>the pylons could be located anywhere within the parameters of the LoD (including the vertical LoD) without resulting in significant effects to heritage assets.</i>' In the case of</p>

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			<p>Hintlesham Hall and pylons RB8 and RB9 we do not agree with this conclusion.</p> <p>We do think the sensitivity testing and conclusion further described in the Applicant's Hintlesham Hall Assessment [APP-128] could be better evidenced. Particularly relating to the images within the setting to better understand its character and context. As detailed above this also does not take into account the LOD and how changes within those would change the level of harm.</p> <p>The conclusion states; <i>"the assessment has shown that the project would result in a loss of heritage significance. However, this is not considered to be so serious that it would lead to an inability to appreciate or understand the Hall or its relationship to its setting. This would not result in substantial harm it falls below the levels 'a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced' and it is considered that the project would not seriously affect a key element of its special architectural or historic interest.</i></p> <p><i>The report concludes that the degree of change to the historic assets would not result in substantial harm to Hintlesham Hall or its ancillary buildings. As set out in this report, minor non-significant effects constitute 'harm', and this degree of harm would be justified by the public benefit gained as a result of the project."</i></p> <p>We agree with this assessment if the proposals are built as shown. However, we do not consider this assessment has taken into account the LOD and the resultant impact if pylons RB8 and RB9 were moved.</p>

Reference	Question to:	Question	
HE1.8.10	<p>The Applicant Historic England Babergh DC Mid Suffolk DC Suffolk CC The Suffolk Preservation Society</p>	<p>Noting that nearby locations and slightly different angles of view might introduce one or more of the proposed new pylons into the visualisation in addition to the new overhead lines, is the location of viewpoint HV01 [APP-063] reasonably representative of the full range of potential impacts on the listed buildings at the Hintlesham Hall estate, including their setting? On this basis, is the assessment set out in the Hintlesham Hall Assessment [APP-128] a reasonable worst case?</p>	<p>The locations of pylons RB8 and RB9 have been considered in great detail to prevent their visibility in views from the stable block of Hintlesham Hall as shown in HV01 [APP-063].</p> <p>Slightly different locations of view might introduce glimpses of the pylons not currently shown in HV01 [APP-063].</p> <p>Viewpoint HV01 [APP-063] is one view out from the stable block. It does not take into account how Hintlesham Hall would be experienced in context with the proposed pylons and overhead lines in the round. For example when in the fields to the north of Hintlesham Hall where the pylons would be located one would experience the hall in its setting. On this basis the assessment set out in the Hintlesham Hall Assessment [APP-128] does not show a reasonable worst case.</p> <p>A reasonable worst case image would show the pylons RB8 and RB9 within various locations within the LOD.</p>
HE1.8.15	<p>The Applicant Historic England</p>	<p>The ExA notes that the Applicant and Historic England are in ongoing discussions about mitigation for adverse effects on heritage assets, including the potential for landscape restoration of the historic park at Hintlesham Hall [RR-036]. Can the Applicant and Historic England provide an update on discussions and comment on how the Limits of Deviation proposed in this location might affect any proposals to restore parts of the historic park.</p>	<p>The proposed landscape restoration at present includes parts of an avenue running southwest from the hall. There is also an avenue proposed along the A1071.</p> <p>We understand the elements of the avenue proposed for restoration running southwest from the hall are based on historical evidence. The elements running alongside the road from north to south are speculative.</p>

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			Th applicant will need to clarify how the Limits of Deviation proposed in this location might affect any proposals to restore parts of the historic park.