

# Bramford to Twinstead Reinforcement

## Volume 7: Other Documents

Document 7.3.4 (B): Draft Statement of Common Ground National Highways

Final Issue B  
October 2023

Planning Inspectorate Reference: EN020002

Infrastructure Planning (Applications, Prescribed Forms and Procedure) Regulations 2009 Regulation 5(2)(q)





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## Version History

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Date	Issue	Status	Description / Changes
April 2023	A	Final	For DCO submission
October 2023	B	Final	Update on submission version of SoCG. All matters now agreed.

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# 1. Introduction

- 1.1.1 A Statement of Common Ground (SoCG) is a written statement produced as part of the application for development consent and is prepared jointly between the applicant and another party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.2 The aim of a SoCG is to help the Examining Authority manage the examination phase of the application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning, and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during examination, and then updated as necessary or as requested during the examination phase.
- 1.1.3 This SoCG is between National Grid Electricity Transmission Ltd ('National Grid') and National Highways relating to the application for development consent for the Bramford to Twinstead reinforcement ('the project'). It has been prepared in accordance with the guidance published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).
- 1.1.4 This SoCG has been prepared to identify matters agreed and matters currently outstanding between National Grid and National Highways. The SoCG will evolve as the application progresses to submission and through examination.

## 1.2 Project Description

- 1.2.1 This document accompanies National Grid's application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex. This would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km ('the project'). The project meets the threshold as a Nationally Significant Infrastructure Project (NSIP), as defined under Part 3 of the Planning Act 2008, hence National Grid requires a development consent order (DCO).
- 1.2.2 The project would comprise approximately 18km of overhead line (consisting of approximately 50 new pylons, and conductors) and 11km of underground cable system (with associated joint bays and above ground link pillars).
- 1.2.3 Four cable sealing end (CSE) compounds would be required to facilitate the transition between the overhead and underground cable technology. The CSE would be within a fenced compound, and contain electrical equipment, support structures, control building and a permanent access track.
- 1.2.4 Approximately 27km of existing overhead line and associated pylons would be removed as part of the proposals (25km of existing 132kV overhead line between Burstall Bridge and Twinstead Tee, and 2km of the existing 400kV overhead line to the south of Twinstead Tee). To facilitate the overhead line removal, a new grid supply point (GSP) substation is required at Butler's Wood, east of Wickham St Paul, in Essex. The GSP substation would include associated works, including replacement pylons, a single circuit sealing end compound and underground cables to tie the substation into the existing 400kV and 132kV networks.
- 1.2.5 Some aspects of the project, such as the underground cable sections and the GSP substation, constitute 'associated development' under the Planning Act 2008.

- 1.2.6 Other ancillary activities would be required to facilitate construction and operation of the project, including (but not limited to):
- Modifications to, and realignment of sections of existing overhead lines, including pylons;
  - Temporary land to facilitate construction activities including temporary amendments to the public highway, public rights of way, working areas for construction equipment and machinery, site offices, welfare, storage and access;
  - Temporary infrastructure to facilitate construction activities such as amendments to the highway, pylons and overhead line diversions, scaffolding to safeguard existing crossings and watercourse crossings;
  - Diversion of third-party assets and land drainage from the construction and operational footprint; and
  - Land required for mitigation, compensation and enhancement of the environment as a result of the environmental assessment process, and National Grid’s commitments to Biodiversity Net Gain.

## 1.3 This Statement of Common Ground

1.3.1 For the purpose of this SoCG, National Grid and National Highways will jointly be referred to as the ‘Parties’. When referencing National Highways alone, they will be referred to as ‘the Consultee’.

1.3.2 Throughout the SoCG:

- Where a section begins ‘matters agreed’, this sets out matters that have been agreed between the Parties and where there is no dispute.
- Where a section begins ‘matters not agreed’, this sets out matters that are not agreed between the Parties and where a difference of opinion remains.
- Where a section begins ‘matters outstanding, this sets out matters that are subject to further negotiation between the Parties.

1.3.3 This SoCG is structured as follows:

- Section 1 provides an introduction to this SoCG and a description of its purpose.
- Section 2 states the role of the Consultee in the DCO application process and details engagement undertaken between the Parties.
- Section 3 sets out matters agreed between the Parties.
- Section 4 sets out matters not agreed between the Parties.
- Section 5 sets out matters where agreement is currently outstanding between the Parties.
- Section 6 includes the signing off sheet.

## 2. Record Of Engagement

### 2.1 Role of the Consultee in the Process

- 2.1.1 National Highways (the Consultee) is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). As such, they have responsibilities for managing the SRN in accordance with the requirements of its licence and in general conformity with the requirements of the Highways Act 1980, and to satisfy the reasonable requirements of road safety. For the purposes of the Planning Act 2008 they are a statutory consultee for all proposed applications likely to affect the road or transport operation and/or planning on roads for which the strategic highways company is the highway authority.
- 2.1.2 National Highway's interest relates to the potential impact of the proposed development on the SRN, which, in the vicinity of this proposal includes the A14, A12 and A120 trunk roads.
- 2.1.3 The Consultee submitted a response to the Planning Inspectorate following the applicants request for a scoping opinion in May 2021 (as Highways England). No response was made to the non-statutory consultation in 2021 or the statutory consultation in 2022. A response was submitted to the targeted consultation in 2022. The Consultee were also sent a draft of the Construction Traffic Management Plan (CTMP) in November 2022 and responded with comments in December 2022.

### 2.2 Summary of Pre-application Discussions

- 2.2.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the application.

Table 2.1 – Pre-Application Discussions

Date	Topic	Discussion points
30/3/2021	Abnormal Indivisible loads (AILs)	Teams meeting to discuss approach to AIL's.
28/5/2021	AILs	Emails on transport of super grid transformers
15/9/2021	AILs	Emails on access for cable drums
7/4/2022	Traffic and Transport Thematic Meeting	General approach on traffic and transport, AIL, public rights of way, traffic surveys, traffic and transport methodology
18/10/2022	Traffic and Transport Thematic Meeting	AIL, HGV routing, LGV routing, Transport Assessment

### 2.3 Summary of Post-submission Discussions

- 2.3.1 Table 2.2 summarises the consultation and engagement that has taken place between the Parties post submission of the application.

Table 2.2 – Post-submission Discussions

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
11/10/2023	Statement Common Ground	of Nature of effect on the SRN (physical works and traffic), need for Protective Provisions and National Highways potential interest in Hadleigh Railway Walk.



## 3. Matters Agreed

3.1.1 The Parties agree the following:

- i) The Consultee (formerly Highways England) is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the SRN. As such, it has responsibilities for managing the SRN in accordance with the requirements of its licence and in general conformity with the requirements of the Highways Act 1980, and to satisfy the reasonable requirements of road safety.
- ii) The SRN in the vicinity of the project includes the A14, A12 and A120 trunk roads.
- iii) The Consultee has been consulted regularly since the project restarted and responded where this has been found to be necessary.
- iv) The Consultee was sent a copy of the draft Construction Traffic Management Plan (CTMP) on 29 November 2022 and responded with comments on 20 December 2022.
- v) The Consultee's A12 Chelmsford to A120 application was included in the long list of proposed developments in the cumulative impact assessment. However, given the location of the upgrades in relation to the project and construction traffic, the parties agree that there are no likely significant cumulative effects associated with the two projects and no concerns over the interactions between the projects.
- vi) The Consultee does not object to the principle of the project.
- vii) The Consultee welcomes the good practice measures contained in Appendix A: Code of Construction Practice (CoCP) of the Construction Environmental Management Plan (CEMP).
- viii) Proposed signage for Public Rights of Way (PRoW) diversions is welcomed by the consultee.
- ix) All AILs have been agreed, through Special Types General Orders (STGO) regulations as set out in the CTMP Section 5.3 (page 16) [APP-180], which regulate the AILs process to use the roads.
- x) The impact of the project on traffic at junctions on the SRN is negligible in terms of absolute numbers of vehicles and as a proportion of existing traffic (see Note on Traffic Assessment on the SRN at Appendix A of this document). As a result, no further assessment is required of the impact of the project on junctions on the SRN.
- xi) No permanent works or alterations are required on the SRN as part of the project and no Protective Provisions are required for the Consultee on the project.
- xii) There may be a requirement for temporary signage for the construction period so that construction vehicles follow the correct routes. These matters are set out in the CTMP (**document 7.6 (B)**).

## 4. Matters Not Agreed

4.1.1 There are no matters that are not agreed.

## 5. Matters Outstanding

5.1.1 There are no matters outstanding between the parties as all matters are agreed.

## 6. Approvals

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**Signed**



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**On Behalf of** National Grid Electricity Transmission

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**Name** John Bevan

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**Position** Senior Project Manager

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**Date** 30 October 2023

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**Signed**



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**On Behalf of** National Highways

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**Name** Mark Norman

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**Position** Spatial Planner

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**Date** 27 October 2023

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# Reference List

Department for Communities and Local Government (2015) *Planning Act 2008: Guidance for the examination of applications for development consent*. March 2015 (Department for Communities and Local Government, 2015)

# Appendix A - Note On Traffic Assessment On The SRN

## Summary

A1. This Note responds to a statement by the Consultee that they would expect to see an assessment of the impact of the construction traffic on the junctions where the construction traffic joins the strategic road network (SRN).

A2. This Note explains that the Applicant considers this to be unnecessary because the impact of the project on traffic at junctions on the SRN is negligible in terms of absolute numbers of vehicles and as a proportion of existing traffic. The impact is also for a very short duration, with the peak period lasting approximately several weeks and all construction impacts being temporary. This conclusion is reached despite very conservative assumptions being made in the Transport Assessment, resulting in a significant over-estimate of traffic numbers generated by the project at each junction.

A3. The content of this Note was discussed at a meeting with the Consultee on 11 October. The Applicant agreed to produce this Note to record points in writing for agreement with the Consultee.

## Applicants Position

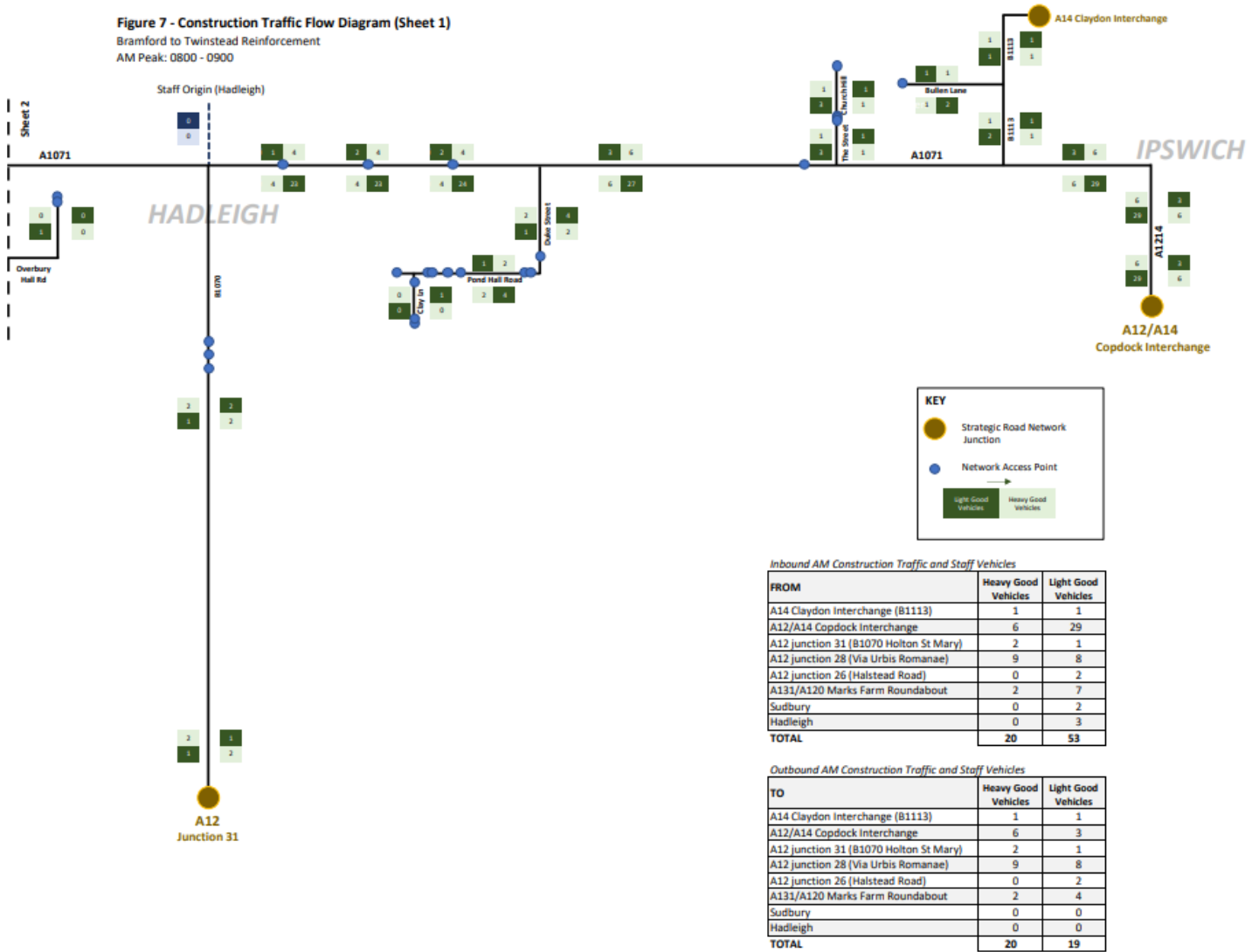
A4. An assessment of the impact of project construction traffic on the SRN has been undertaken. Full details are provided in the Transport Assessment [**APP-061**]. Figure 7 in the Transport Assessment (see image on next page) indicates that the junctions on the SRN that are expected to carry the highest volume of project construction traffic are:

- The A12/A14/A1214 Copdock junction – during peak construction activity, the A1214 approach arm is forecast to carry an additional 35 vehicles northbound and 9 vehicles southbound in the AM peak hour (0800-0900) – the same volumes would be expected in the PM peak hour (1600-1700) with the direction reversed.
- The A12 junction 28 – during peak construction activity, the Via Urbis Romanae approach arm is forecast to carry an additional 17 vehicles northbound and 17 vehicles southbound in both the AM peak hour (0800-0900) and the PM peak hour (1600-1700).

A5. The impact at the other four SRN junctions expected to carry project construction traffic (A14 Claydon Interchange, A12 junction 26, A12 junction 31, and the A131/120 Marks Farm Roundabout) would be less than 10 vehicles in any direction in either the AM or PM peak hour during peak construction activity.

A6. When considered as a percentage of existing traffic, the Transport Assessment shows that for HGV, the percentage increase on these sections of the A12 and A120 would be approximately 4% for the peak periods, which is within the normal parameters for traffic variation range at a SRN junction, when preparing sensitivity test.

**Figure 7 - Construction Traffic Flow Diagram (Sheet 1)**  
 Bramford to Twinstead Reinforcement  
 AM Peak: 0800 - 0900



A7. The forecasts summarised above include a significant level of contingency. For example, as set out in paragraphs 6.2.8 and 6.2.9 of the Transport Assessment, August 2025 was identified as the overall peak month for construction traffic generation, but the peak monthly forecast at each Access Point (AP) in a seven-month period centred on August 2025 was used to generate a traffic forecast for the Transport Assessment for both construction vehicles and staff vehicles. This was to account for any programme movements that would align peak activity at different APs and resulted in a significant uplift in the forecast used in the Transport Assessment. For example, the peak daily on-site staff estimate for the whole project in August 2025 is 350, but the result of the seven-month review meant that the Transport Assessment assumes 528 staff are on-site during a peak day – this is a 51% uplift in expected peak staff numbers for the purposes of assessment.

A8. Further uplifts were also applied during the translation of peak monthly construction vehicle estimates to peak day, and during the translation from peak day to peak hour to allow for some variation in vehicle movements at different times of day.

A9. In addition, the peak construction traffic forecast described above is only expected to last for several weeks. As set out in paragraph 7.3.14 of the Transport Assessment, construction traffic generation in the peak month of August 2025 is forecast to be 7% higher than in any other month in the construction programme, and 13% higher than all but five other months.

A10. Therefore, the project would have negligible impacts upon the operation of the SRN during the project construction and hence the risk assessments are not necessary.

## **Conclusion**

A11. Therefore, a robust worst-case assessment of project impacts on SRN junctions has been undertaken. Given the low numbers of vehicles expected to use SRN junctions during periods of peak construction activity, the significant contingency added to the forecast, and the temporary nature of construction traffic generation, it is the view of the Applicant that the project would not have a substantial impact upon the operation of the SRN during construction and that it would be disproportionate to undertake further assessment of any of the impacted junctions.



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National Grid plc  
National Grid House,  
Warwick Technology Park,  
Gallows Hill, Warwick.  
CV34 6DA United Kingdom

Registered in England and Wales  
No. 4031152  
[nationalgrid.com](http://nationalgrid.com)