

Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.6.2.4: Applicant's Written Summaries of Oral Submissions to Issue Specific Hearing 4

Final Issue A
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1. About this Document

1.1 Introduction

- 1.1.1 This document summarises the case put by National Grid Electricity Transmission plc (the Applicant), at Issue Specific Hearing 4 (ISH4) on 9 November 2023 for the Bramford to Twinstead Reinforcement (referred to as the project).
- 1.1.2 The hearing opened at 13:30 on 9 November 2023 and closed at 16:43 on 9 November 2023. The agenda for the hearing [EV-027] was published on the Planning Inspectorate’s website on 27 October 2023.
- 1.1.3 In what follows, the Applicant’s submissions on the points raised broadly follow the items set out in the Examining Authority’s agenda.

1.2 Attendees on behalf of the Applicant

- 1.2.1 Michael Humphries, Counsel instructed by Bryan Cave Leighton Paisner LLP (BCLP) appeared on behalf of the Applicant.
- 1.2.2 The following expert witnesses also made submissions throughout the hearing:
- Cheryl White, Jacobs (Environment);
 - Jonathan Mullis, Jacobs (Cultural Heritage);
 - Sarah Gibson, Gillespies (Landscape and Visual);
 - Sally Rotherham, National Grid (Environment and Consents); and
 - Rob Fielden, National Grid (Engineering and Design).

2. The Applicant's Summary of Case on Item 3.0: Biodiversity, Ecology and Nature Conservation

2.1 Item 3.0. Biodiversity, Ecology and Nature Conservation

Table 2.1 – Item 3.0. Biodiversity, Ecology and Nature Conservation

Issued Discussed	Summary of Oral Case
3.1. Habitats Regulation Assessment. Potential Effects of Surface and Groundwater Quality Changes on the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar Site	
Update on explanation of position of negotiation with Natural England.	<p>The Applicant updated the Habitats Regulation Assessment Report at Deadline 1 [REP1-007] which concluded that there were no likely significant effects on the Stour and Orwell Estuary SPA and Ramsar site, when taking into account the good practice measures in the Code of Construction Practice (CoCP) [REP3-026].</p> <p>The Applicant has updated good practice measure GH07 in the CoCP at Deadline 3 [REP3-026] to say that the Hydrological Risk Assessment for the trenchless crossings would be submitted to the Environment Agency for approval. If the Environment Agency, as competent authority for surface and groundwater, is satisfied that the method would not affect water quality in situ, then there would be no risk to the Stour and Orwell Estuaries SPA and Ramsar site which lie over 5km downstream.</p>
3.2. Clarification of Proposals for Ecological Replacement, Mitigation, Enhancement and Biodiversity Net Gain.	
Clarification of planting proposals in the application and how these would be secured	<p>The Applicant clarified that all necessary planting required as part of the environmental impact assessment is described in the Environmental Statement (ES). This includes reinstatement planting of vegetation temporarily removed during construction, embedded planting around the cable sealing end (CSE) compounds and grid supply point (GSP) substation, additional mitigation identified to offset a likely significant effect and landscape softening. All of this planting is set out within the Landscape and Ecological Management Plan [REP3-034] and is shown in Appendix B: Reinstatement Plan [REP3-036]. The LEMP and its appendices are secured through Requirement 4 of the draft Development Consent Order (draft DCO) [REP3-007].</p> <p>Biodiversity Net Gain (BNG) proposals are described in the Environmental Gain Report [APP-176] and are secured through Requirement 13 of the draft DCO [REP3-007].</p>
Is all planting within the Order Limits	The Applicant confirmed that all planting (including that identified within the ES and the BNG proposals) lie inside the Order Limits.
Compulsory acquisition of enhancement areas	The Examining Authority (ExA) asked whether the Applicant was seeking compulsory acquisition for the enhancement areas. The Applicant responded by saying that in the first instance it was seeking landowner agreement for the enhancement proposals. The

Issued Discussed	Summary of Oral Case
	Applicant has also included the land within the compulsory acquisition powers sought. The Applicant confirmed that it was of the view that the compulsory acquisition tests had been met.
3.3. Impacts, Mitigation and Monitoring in Relation to Hintlesham Woods Site of Special Scientific Interest (SSSI)	
Description of works required around Hintlesham Woods SSSI	<p>The Applicant described the methodology and works at Hintlesham Woods, which are described in ES Appendix 7.1 Annex B Hintlesham Woods SSSI Assessment [APP-111].</p> <p>The Applicant noted that the main works inside the woodland would be pulling the conductors, which would be similar to the works undertaken for the refurbishment of the existing 400kV overhead line in 2013.</p> <p>The ExA asked would this be in a single operation or require repeated visits to the woods. The Applicant said that it would involve repeated visits to the north and west of the woodland. The works inside the woodland would depend on the remaining asset life of the conductors.</p> <p>[Post hearing note: If conductors are to be replaced, the works would be done during the relevant outage for the circuits. This would be Outage 4 for the southern circuit, and between Outage 5 to Outage 7 for the northern circuit.]</p>
Would the works be confined to the existing maintained swathe?	<p>The proposed 400kV overhead line would lie within the maintained swathe for the existing 400kV overhead line and therefore would continue to be maintained and managed in a similar manner for the new proposed overhead line.</p> <p>The Applicant has responded in more detail in its response to ISH4 Action Point 1 (document 8.6.3).</p>
What is the Applicant's response to the proposal to coppice the full width rather than a graduated swathe?	The Applicant said it would respond at Deadline 4 on this matter in the Applicant's Response to the November Hearings Action Points (document 8.6.3, ISH4 Action Point 1).
What monitoring is proposed at Hintlesham Woods SSSI?	<p>The Applicant signposted to the existing embedded measures contained within the Register of Environmental Actions and Commitment (REAC) (document 7.5.2 (C)). This includes EM-AB09 which limits the works that can take place in bird breeding season. The Applicant has also submitted Technical Note on Noise Levels at Hintlesham Woods SSSI [REP3-057] which commits to an additional measure EM-AB14 which states that percussive piling would not be used for temporary pylon (RB12T), which has been added to the REAC at Deadline 3. Therefore, the Applicant does not consider there to be a need for monitoring during construction, as noise disturbance during bird breeding would be avoided through these measures.</p> <p>The proposed 400kV overhead line would lie within the maintained swathe for the existing 400kV overhead line and therefore would continue to be maintained and managed in a similar manner for the new proposed overhead line. Therefore, the Applicant does not consider that monitoring is required during operation.</p>
3.4. Impacts and Mitigation in Relation to Other Ancient Woodland	
Impacts and mitigation on ancient woodland	The Applicant noted that it has produced a Technical Note on Ancient Woodland and Potential Ancient Woodland [REP3-046] which was in response to Natural England's Written Representation [REP2-026]. This clarifies the potential effects and measures proposed at each specific ancient and potential ancient woodland.

Issued Discussed	Summary of Oral Case
Separation of habitats	The ExA asked the Applicant to respond on the comment from the Woodland Trust in its Written Representation [REP2-032] regarding separation of ancient woodland from adjoining habitats that may ecologically support the ancient woodland. The Applicant agreed to respond at Deadline 4 on this matter in the Applicant's Response to the November Hearings Action Points (document 8.6.3, ISH4 Action Point 2).
Consideration of dust and noise on ancient woodland	The Applicant has commented on this point in Table 2.14 of the Applicants Comments on Written Representations [REP3-048]. The Applicant considers that as the effects are temporary and with the good practice measures in the CoCP [REP3-026], that the project is compliant with the Natural England and Forestry Commission Standing Advice on ancient woodland.
3.5. The Proposed Removal of Veteran Tree T378 and Proposed Protection for Other Ancient and Veteran Trees	
Ancient and veteran trees	The Applicant noted that there are no ancient trees within or near to the Order Limits and that veteran trees are trees that have veteran features, for example containing fissures or with missing limbs and are not necessarily old or ancient. The Applicant noted that veteran trees are identified in the Arboricultural Impact Assessment [REP1-012] and that all veteran trees within the Order Limits, except for veteran tree T378, would be managed as per the protection measures set out in Table 6.2 of the LEMP [REP3-034].
Veteran tree T378 and why it is not possible to avoid this	The Applicant confirmed that veteran tree T378 would need to be removed as part of the project, as it lies towards the centre of an underground cable section of the route. The underground cables require a construction working width of 80m as per Design and Layout Plans Cable Working Cross Section [APP-027]. During the options appraisal and decisions on the route alignment, the alignment was chosen to avoid two grade B groups of trees (G1525 and G1602), as shown on Sheet 9 of 14 in the Arboricultural Impact Assessment [REP1-012]. The Applicant considers the retention of these two groups of trees within the landscape was of higher priority than the loss of a single veteran tree. The Applicant is proposing to replace the veteran tree with another tree outside of the cable section, as a tree cannot be planted over the top of the underground cables. This is shown on Sheet 9 of 14 of LEMP Appendix B: Reinstatement Plan [REP3-036].
Is the 15m buffer for veteran trees aligned with the standing advice from Natural England and the Forestry Commission	The Applicant confirmed that as the effects on ancient woodland would be short term and temporary a 15m buffer is considered appropriate and in line with the Natural England and Forestry Commission Standing Advice. In addition, the Applicant has undertaken Arboricultural Surveys to inform the root protection zones around ancient woodland based on specific trees.
Discussions with third parties	The Applicant confirmed that it would discuss suitable compensation for the veteran tree with the ecological advisor at Babergh and Mid Suffolk District Councils and report back at a future deadline whether an agreement had been reached (document 8.6.3, ISH4 Action Point 3).
3.6. Impacts and Mitigation in Relation to Other SSSI	
Arger Fen SSSI	The Applicant confirmed that its position (as set out in ES Chapter 7: Biodiversity [APP-075]) had not changed with regards to Arger Fen SSSI. It considers that this site does not need to be included in the groundwater dependent terrestrial ecosystem assessment as there is no pathway to effect. Although the Order Limits lie within 10m of the site, this is for planting purposes only; the main

Issued Discussed**Summary of Oral Case**

construction works lie approximately 670m away. The Applicant will seek to agree this matter through an update to the Statement of Common Ground with Natural England [REP3-020].

3. The Applicant's Summary of Case on Item 4.0: Historic Environment

3.1 Item 4.0. Historic Environment

Table 3.1 – Item 4.0: Historic Environment

Issued Discussed	Summary of Oral Case
4.1. The Suffolk Councils' Concerns with the Proposed Route Outside and to the West of Hintlesham Woods and Impacts on the Setting of Listed Buildings	
The ExA asked Babergh and Mid Suffolk District Councils for a list of listed buildings referred to the Local Impact Report [REP1-045]	The Applicant made no comment on this matter.
4.2. Hintlesham Hall, Associated Listed Buildings and the Setting Provided by the Former Park	
What is the Applicant's current position following the site visit?	<p>The Applicant confirmed that the Proposed Alignment follows the alignment (and pylon locations) agreed with Historic England (formerly English Heritage) in 2013 and that the limits of deviation (LoD) are already constrained at this location due to the presence of the existing 400kV overhead line and conductor swing.</p> <p>In response to feedback from Historic England and the relevant planning authorities, the Applicant has updated the existing embedded measure (EM-AB01) in the REAC at Deadline 3 [REP3-028] to confirm that a pylon would not be placed between the access track to Kennels Cottage and 100m to the south west of the track in order to avoid its visibility in key views from the ancillary (Grade II*) Listed Building, which Historic England has noted as a key view from the archway of the listed building (Heritage Viewpoint HV-01). The commitment was discussed on site with Historic England and the Applicant is awaiting feedback from Historic England to confirm whether this wording is acceptable.</p>
Limits of deviation	<p>The Applicant noted that the LoD are also constrained longitudinally by the tension (angle) pylons at either end of the section and the required spacing apart. However, the updated commitment (EM-AB01) has sought to limit this flexibility in the most sensitive location.</p> <p>The Applicant confirmed that the vertical LoD are required for technical reasons, as the height of the conductors would need to be at a required height above ground level and therefore the pylon height is determined by ground level and the height of surrounding pylons. The Applicant also noted that it understood that Historic England's concerns were regarding the location of the pylon within the LoD, and not the vertical LoD, which has led to updating commitment (EM-AB01) at Deadline 3.</p>

4.3. Assessment of Effects on Cultural Heritage Assets Associated with Famous Artists and Writers, Including Benton End House and Overbury Hall

Benton End and Overbury Hall

The Applicant noted that listed buildings are statutorily protected primarily for their architectural and historic special interest and were therefore valued as having high heritage value within the ES Appendix 8.2 Historic Environment Impact Assessment [APP-127].

The Applicant noted that Benton End House, a Grade II* listed building with attached Grade II listed outbuildings, and Overbury Hall, a Grade II listed building, were associated with the artists Sir Cedric Morris and the East Anglian School of Art and the nationally important artist John Constable respectively. These artistic associations are mentioned in ES Chapter 8: Historic Environment [APP-076] and the impacts on the properties, from development within their settings, are summarised in ES Appendix 8.2 Historic Environment Impact Assessment [APP-127].

Benton End has a lack of project inter-visibility southwards, toward the existing infrastructure, which consists of a 400kV overhead line and a 132kV overhead line. The historic environment assessment concluded that the impact of the project would have a neutral effect, due to the lack of change to its setting arising from the replacement of the 132kV overhead line with the proposed 400kV overhead line, behind the retained 400kV overhead line. The project would not change the architectural and historic interest of Benton End or the artistic associations of the house with the East Anglian School of Art. The building would not experience any additional visual intrusion due to the distance and lack of inter-visibility with the project, resulting in a neutral effect on the heritage value of Benton End.

The Grade II listed Overbury Hall was the subject of a pencil sketch study by the nationally important artist John Constable in 1815. Overbury Hall has greater proximity to the existing 400kV overhead line and 132kV overhead line. The effect on Overbury Hall of replacing the existing 132kV overhead line with a 400kV overhead line was assessed in terms of visual intrusion and the effect on its architectural and historic associations. However, the change in setting arising would be limited by screening from the modern development to the north of the listed building and from mature trees and vegetation around the perimeter of the property; the impact was assessed as a minor adverse effect on the heritage value of Overbury Hall, which is not significant.

Is an extra layer of assessment required to consider the cultural associations of the landscape?

The Applicant confirmed that it did not consider there to be a need for a separate assessment as the listed building assessment acknowledged the cultural associations of the listed buildings with artists and takes those cultural associations into consideration. There would be no effects on the historic fabric of buildings and therefore the setting impacts were exactly what was assessed. The listed buildings each have a setting, which is protected. However, the Applicant notes that the setting is not a 'heritage asset' in its own right and does not have its own setting (i.e. the setting of the setting).

Listed buildings are afforded statutory protection for their architectural and historic interest, which is largely linked to their design and age. Artistic considerations can form part of the associative historic interest in a property and are taken into consideration where renowned artists have associations with the property or depict them in their work. The listed buildings would not lose architectural or historic value, or lose their historic associations, due to changes to their settings from to the project.

4.4. Update on the Proposals for Archaeological Investigations and on the Outline Written Scheme of Investigation

Can the Applicant confirm that the additional measures requested by Essex County Council have been added to the REAC at Deadline 3.

The Applicant is updating the REAC in response to the feedback received from the ExA at the Preliminary Meeting (Action Point 20 in Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034]). The Applicant also noted that it considers that the Outline Written Scheme of Investigation [AS-001] already secures (though Requirement 11 of the draft DCO [REP3-007]) the need for Detailed Written Schemes of Investigation and for these to be signed off by the Archaeological Advisors at the councils. The Applicant will submit the REAC at Deadline 4 (document 7.5.2 (C)), which will include a Requirement that the Detailed Written

Issued Discussed**Summary of Oral Case**

Schemes of Investigation will be needed and that these will need to be signed off by the Archaeological Advisors at the relevant local authorities.

4. The Applicant's Summary of Case on Item 5.0: Landscape and Views

4.1 Item 5.0. Landscape and Views

Table 4.1 – Item 5.0. Landscape and Views

Issued Discussed	Summary of Oral Case
5.1. The Examining Authority's Unaccompanied Site Inspection 4	
The Examining Authority's Unaccompanied Site Inspection 4	The Applicant made no comment on this matter.
5.2. The Setting of the Dedham Vale Area of Outstanding Natural Beauty (AONB) and the Case for Additional Undergrounding in Section F of the Proposed Route in Relation to Effects on the AONB and the Stour Valley	
The Setting of the Dedham Vale AONB and the Case for Additional Undergrounding in Section F of the Proposed Route in Relation to Effects on the AONB and the Stour Valley	The Applicant made no comment on this matter.
5.3. Consideration of the Statutory Purposes of the AONB	
Impacts of the project on Dedham Vale AONB during construction	<p>The Applicant noted that the Route Corridor Study [REP3-015] identified Corridor 2 as an 'opportunity corridor', as it would remove part of the 132kV overhead line from the landscape. This coupled with undergrounding within the AONB, would bring operational benefits to the landscape and views within Dedham Vale AONB, as evidenced in ES Chapter 6: Landscape and Visual [APP-074]. There will need to be short term impacts to the AONB during construction to achieve this long-term benefit and these are acknowledged within ES Chapter 6: Landscape and Visual [APP-074].</p> <p>As set out in Dedham Vale AONB Special Qualities and Statutory Purpose [REP1-032], the Applicant notes that the construction works would affect a small proportion of the AONB in an area within limited public access. Therefore, the Applicant does not consider this short-term effect on a small part of the AONB would affect its overall statutory purpose.</p>

Issued Discussed	Summary of Oral Case
Should the AONB be treated as a single entity whereby any effect affects the whole	<p>The Applicant's position is that it would be inappropriate to say that there is no difference between an effect on a small part of the AONB to an effect on the entirety of the AONB. The scale/magnitude would come into the significance/materiality of the effect.</p> <p>The Applicant noted that the route selected within the AONB was through primarily arable farmland with very little vegetation affected. These areas can be reinstated quickly following construction. There is also a trenchless crossing through the Box Valley which would further limit the effects on the landscape.</p> <p>The Applicant also commented that the landscape through this part of the AONB is already influenced by commercial fruit farms and the existing 400kV overhead line which would limit the magnitude of impact from the project. The Applicant noted that for the section within the AONB where the underground cables are to be constructed, there is only one public right of way (PRoW) so public access is limited.</p>
Displacement of recreational activity	<p>The Applicant noted that for the section within the AONB where the underground cables are to be constructed, there is only one PRoW. The survey results for this PRoW are set out in Table 12.1 and 12.2 of ES Chapter 12: Traffic and Transport [APP-080], which shows very low usage. Therefore, the Applicant does not consider that construction of the project would result in displacement of recreational activity.</p>

5.4. Special qualities of the Dedham Vale AONB

Impacts of the project on the special qualities.	<p>The Applicant has set out its position on this matter in Dedham Vale AONB Special Qualities and Statutory Purpose [REP1-032].</p>
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5.5. Location of the Dedham Vale East CSE Compound

Consideration of moving the CSE compound to Layham Quarry	<p>The Applicant held a non-statutory consultation period at recommencement of the project (2021) to obtain up to date feedback on the proposals. Key feedback received was in relation to the Dedham Vale East CSE compound being in close proximity to the AONB and Polstead Conservation Area. The Applicant changed the location of the CSE compound to increase the distance of the CSE compound from Polstead Conservation Area and the AONB boundary to move it out of its direct setting and provided an addition 1km of undergrounding.</p> <p>The Applicant stated that the siting of CSE compounds has considered locations where the existing landform and topography, as well as existing vegetation provides natural screening. The proposed CSE compound is located between two woodland blocks and therefore benefits from the screening provided by the trees to reduce landscape and visual effects on surrounding receptors. Planting has also been embedded into the design of the CSE compound to further filter views and soften the effects from surrounding receptors.</p> <p>A CSE compound located at Layham Quarry was specifically considered in response to consultation feedback. Layham Quarry is approximately 800m from the proposed CSE compound location. Whilst Layham Quarry is currently inactive (since 2013), a planning application to extend the timescales for extraction has been granted until 2032 and the owners of the quarry intend to recommence operations at some point in the future.</p> <p>Whilst a move to Layham Quarry would locate the CSE compound further away from the AONB, the additional cost associated with the extra underground cabling (rather than overhead lines) would not be justified in terms of policy or the Applicant's statutory duties (as a regulated business) to be economic and efficient. The move would also not be in accordance with mineral safeguarding policy. It is noted in the Planning Statement [APP-160] that the new overhead line in this location would not result in the sterilisation of</p>
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Issued Discussed	Summary of Oral Case
	<p>minerals, as minerals could be extracted from beneath the overhead line, however, a CSE compound development at this location and underground cables connecting into it may conflict with the future extraction of minerals at this site.</p> <p>The Applicant has therefore concluded that when taking into account all of its statutory duties and National Policy, on balance the proposed location is considered to be suitable.</p>
<p>Considering a location more centrally between the Millfield woodland blocks</p>	<p>The Applicant was asked by Suffolk County Council and Babergh and Mid Suffolk District Councils in their Local Impact Reports [REP1-045] to look at placing the CSE compound more centrally between Millwood Road and Heath Road. This would bring the CSE compound close to the existing 400kV (operational) overhead line being retained, which would increase the landscape and visual impacts and the woodlands themselves would then constrain the working area in terms of available space for construction. The location of Dedham Vale East CSE compound balances engineering and environmental aspects.</p>
<p>5.6. Whether Additional Viewpoints and Assessment are Required</p>	
<p>Process for agreeing the viewpoints</p>	<p>The Applicant noted that it has been in discussions with the Host Authorities regarding viewpoints since early 2021, and it is understood these had been agreed as set out in line 3.4.3 in the Draft Statement of Common Ground [REP1-015].</p>
<p>Viewpoints in Section H: GSP Substation</p>	<p>The Applicant noted that the viewpoints proposed in the application around the GSP substation were the same viewpoints that were included in the Town and Country Planning Application that has been approved by Braintree District Council under the Town and Country Planning Act.</p>
<p>Comments on the green dot plan</p>	<p>The Applicant noted that H-05 and H-11 are existing viewpoints assessed within the application along the same PRoW (one to the north and one to the south) looking to the west. The Applicant noted that as construction of the GSP substation has already begun under the Town and Country Planning Application consented by Braintree District Council, it would be difficult to now take a baseline viewpoint photograph at this location.</p> <p>The Applicant also noted that it did not see the merit in an additional viewpoint at this stage. The viewpoints provide an 'aide memoir' to the Inspectors going on site and are not a replacement for Inspectors (or other parties) visiting the site.</p>
<p>Additional viewpoint at Stour Valley East CSE Compound</p>	<p>The Applicant noted that there is very limited visibility from the nearby PRoW at this location. There is a short section of the PRoW near Sawyer's Farm where the very top of the gantries may be seen, however the Applicant considers that this is unlikely to result in significant effects.</p>
<p>Will further viewpoint assessments be undertaken?</p>	<p>The Applicant confirmed that it believes that the viewpoints selected are representative of the way that a community currently experiences views from public locations and how these will change due to the project. Representative views aid the decision-making process and are not required for the landscape assessors to make their judgements on the effects of the project. The Applicant is happy to consider any additional requests that the ExA consider would inform its understanding of the project.</p>
<p>5.7. Sufficiency of Visual Mitigation for the CSE Compounds</p>	
<p>Maintenance duration of planting at CSE compounds</p>	<p>The Applicant confirmed that the embedded planting at the CSE compounds and the GSP substation would be maintained for the life of the asset, as set out in the LEMP [REP3-034] and secured by Requirement 4 of the draft DCO [REP3-007].</p>

Issued Discussed	Summary of Oral Case
Further planting suggested at Stour Valley East CSE compound	The Applicant noted that comments were raised during the site visit on 7 November 2023 and will take these away to consider whether additional planting would be appropriate.
Further planting suggested at Stour Valley West CSE compound	The Applicant noted that it understands the suggested planting is above the underground cables, where it is not possible to plant trees due to safety requirements. The proposed location is in a large arable field and the Applicant is working with the landowner to identify suitable locations for planting that would provide additional screening whilst limiting impacts on farming operations and land use. The Applicant has been working with the landowner at this location, as it is also a site where enhancements (BNG) is proposed but the Applicant is also keen to balance the requirements of the affected person. The Applicant confirmed that it would provide an update on these discussions at Deadline 4.
Visual impact of the permanent access route at Stour Valley East CSE compound	The Applicant noted that it will take this matter away and respond at Deadline 4.
5.8. Sufficiency and Security of Landscape and Visual Mitigation and Compensation Planting Generally	
Sufficiency and security of mitigation and compensation planting	The Applicant considers that the project is very well mitigated and that it has provided a full package of reinstatement and landscape planting which is set out in the LEMP [REP3-034] and secured by Requirement 4 and Requirement 9 of the draft DCO [REP3-007].
5.9. Inter-project Cumulative Effects and Mitigation at the Existing Bramford Substation	
Inter- project cumulative effects and mitigation at the existing Bramford Substation	The Applicant noted that other proposed developments around Bramford Substation are at an earlier stage of design evolution than the Bramford to Twinstead Project. The Bramford to Twinstead project team is in regular contact with the National Grid Norwich to Tilbury project team and will continue to work together where possible. However, due to the early phase of other developments (many of which are not National Grid projects), which do not currently have developed designs or mitigation proposals, it is difficult and inappropriate to incorporate additional mitigation into the Bramford to Twinstead Reinforcement project for potential future projects, the design of which and consenting outcomes are yet to be determined (it is not appropriate to mitigate for potential future scenarios that may or may not be consented).

5. The Applicant's Summary of Case on Item 7.0: Any Other Business

5.1 Item 7.0. Any Other Business

Table 5.1 – Item 7.0. Any Other Business

Issued Discussed	Summary of Oral Case
7.1. Removal of Additional Section of the 132kV Overhead Line	
Removal of a section of the 132kV overhead line between Twinstead and the GSP substation	The Applicant noted that the overhead line is owned by UK Power Networks ('UKPN') and it would be a decision for UKPN as to whether to retain or remove the line. The Applicant's Order Limits do not include this section of overhead line.
7.2. December Hearings	
December hearings and whether these should be virtual or in person	The Applicant noted that virtual hearings would be acceptable and commented that it would be difficult, given the Christmas period, to secure venues and hotels for in-person events given the available timescales.

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