

Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.6.5: Applicant's Comments on Other Submissions Received at Deadline 3

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1. Introduction

1.1 Purpose of the Document

1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on the other submissions from Interested Parties received at Deadline 3 in response to an application for development consent for the Bramford to Twinstead Reinforcement (the project). This document should be read alongside the suite of other documents submitted to the Examining Authority for Deadline 4, such as the Applicant's Comments on Responses to First Written Questions (**document reference 8.6.4**). It should be noted that the responses received from Interested Parties responding to ExQ1 are addressed in the Applicant's Comments on Responses to First Written Questions (**document reference 8.6.4**).

1.1.2 The responses received are as follows:

- Applicant's Comments on the Submission from Suffolk County Council (SCC) [**REP3-077**]; and
- Francis Prosser [**AS-008 & REP3-072**].

1.2 Project Overview

1.2.1 An application for development consent was submitted to the Planning Inspectorate on the 27 April 2023 to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The project would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km comprising of an overhead line, underground cables and a grid supply point (GSP) substation. It also includes the removal of 25km of the existing distribution network, 2km of the existing transmission network and various ancillary works.

1.2.2 The application for development consent was accepted for Examination on the 23 May 2023.

1.2.3 A full description of the project can be found in Environmental Statement (ES) Chapter 4: Project Description [**APP-072**].

1.3 Structure of the Report

1.3.1 Table 1.1 sets out the structure of this document. The Applicant has responded to paragraph numbers found in the individual submissions, grouping paragraphs where relevant.

Table 1.1 – Structure of the Report

Chapter	Chapter Heading	Content
1	Introduction	This Chapter identifies the responses received at Deadline 3 which do not relate to questions posed by the Examining Authority, the project overview and the structure of the report.
2	Applicant's Comments on the Submission from Suffolk County Council (SCC)	This Chapter outlines the Applicant's comments on the SCC comments on the Deadline 2 submission [REP3-077], submitted at Deadline 3.
3	Francis Prosser	This Chapter outlines the Applicant's comments on Francis Prosser's submissions [AS-008 and REP3-072] at Deadline 3.

2. Applicant’s Comments on the Submission from Suffolk County Council

2.1 Introduction

- 2.1.1 Table 2.1 summarises the Applicant’s comments to submissions provided by SCC at Deadline 3 [REP3-007] in respect of the Applicant’s Schedule of Changes to the draft Development Consent Order (DCO) submitted at Deadline 2 [REP2-001].
- 2.1.2 Updated versions of the Applicant’s Schedule of Changes to the draft DCO have since been submitted at Deadline 3 [REP3-040] and at Deadline 4 (**document 8.4.2 (C)**). The Applicant anticipates that SCC may wish to comment on those submissions at subsequent Examination deadlines.
- 2.1.3 The Applicant has not commented on matters that SCC has said it is not concerned about.

Table 2.1 – Applicant’s Comments on the SCC Deadline 3 Submission [REP3-007]

Ref	Matter	Point Raised	Applicant’s Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 2			
1.1 to 1.3	Introduction	SCC introduces the purpose of [REP3-007] structure and presents how they have commented on Schedule of Changes to the draft DCO – Issue B [REP2-001].	The Applicant welcomes SCC’s comments and has no comments on this matter.
1a	Article 11, Street works	<p>SCC does not consider the proposed drafting achieves the Applicant’s aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application.</p> <p>SCC considers the proposed drafting would have the effect of allowing the undertaker and street authority to agree, at the end of the 28 day period, whether consent is deemed to have been granted.</p> <p>To achieve the Applicant’s aim, SCC has proposed several amendments.</p>	<p>The Applicant has had regard to SCC’s comments in respect of Article 11.</p> <p>The Applicant has amended Article 11(3) in the draft DCO (document 3.1 (D)) in accordance with the suggestion made by SCC (the words “...unless otherwise agreed...” having been replaced with “...<i>(or such other period as agreed by the street authority and undertaker)</i>...”).</p> <p>This change is documented in the Applicant’s Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p>

Ref	Matter	Point Raised	Applicant's Comments
		<p>To achieve the Applicant's aim, SCC considers paragraph 11(3) should be amended as follows – "(3) If a street authority that receives an application for consent under paragraph (2) fails to notify the undertaker of its decision within 28 days (or such other period as agreed by the street authority and undertaker) beginning with the date on which the application was made, the authority will be deemed to have granted consent". In any event, SCC does not consider the Applicant's aim is satisfactory because the extension of time is dependent on the undertaker's agreement and if that is withheld (even if withheld unreasonably) SCC would be in the same position as if paragraph (3) had not been changed in the first place.</p> <p>SCC maintains its position, as set out in the LIR [REP1-045] and in its Comments on Applicant's Comments on Relevant Representations [REP2-013]:</p> <p><i>"While SCC will ensure that any application for consent will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 28- day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications. Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 28 days is too short and requests that it is replaced with 56 days. SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision".</i></p> <p>In addition, SCC considers the determination period should begin on the "date on which the application was received" rather than the "date on which the application was made". SCC assumes this change will be uncontroversial because the determination period in the following articles already commences on receipt of the application and it would be sensible to have consistency across provisions: articles 19(9) (discharge of water);</p>	<p>The Applicant maintains its position that the change is both appropriate and pragmatic, particularly when considered in the context of the proposed Framework Highways Agreement.</p> <p>In response to the Council's comments on Article 11(3), and indeed the further provisions in the draft DCO (document 3.1 (D)) where a 28 day determination period is prescribed, the Applicant refers to page 99 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Councils' Local Impact Report [REP3-049].</p> <p>The Applicant therefore respectfully disagrees with the Council and considers that the 28 day determination period should be retained in all instances in the draft DCO (document 3.1 (D)).</p> <p>The Applicant has, however, amended Article 11(3) to make clear that the determination period should begin on the date on which an application is received.</p> <p>This change is also documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p>

Ref	Matter	Point Raised	Applicant's Comments
		<p>21(8) (authority to survey and investigate the land); 47(8) (traffic regulation) and 48(5) (felling or lopping).</p> <p>For the same reason as set out in "SCC's comments on changes made" in Row 1, SCC does not consider the proposed drafting achieves the Applicant's aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application.</p> <p>In any event, SCC maintains its position, again as set out in "SCC's comments on changes made" in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.</p>	
1b	Article 14, Power to alter layout etc. of streets	<p>SCC does not consider the proposed drafting achieves the Applicant's aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application.</p> <p>In any event, SCC maintains its position, again as set out in "SCC's comments on changes made" in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.</p>	<p>The Applicant has had regard to SCC's comments in respect of Article 14.</p> <p>The Applicant has amended Article 14(5) in the draft DCO (document 3.1 (D)) in accordance with the suggestion made by SCC (the words "<i>Unless otherwise agreed....</i>" having been replaced with "<i>....(or such other period as agreed by the street authority and undertaker)....</i>").</p> <p>This change is documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p> <p>The Applicant maintains its position that the change is both appropriate and pragmatic, particularly when considered in the context of the proposed Framework Highways Agreement.</p> <p>In response to the Council's comments on Article 14(5), and indeed the further provisions in the draft DCO (document 3.1 (D)) where a 28 day determination period is prescribed, the Applicant refers to page 99 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Councils' Local Impact Report [REP3-049].</p> <p>The Applicant therefore respectfully disagrees with the Council and considers that the 28 day determination period should be retained in all instances in the draft DCO.</p>

Ref	Matter	Point Raised	Applicant's Comments
			<p>The Applicant has, however, amended Article 14(5) to make clear that the determination period should begin on the date on which an application is received.</p> <p>This change is also documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p>
1c	Article 15, Temporary stopping up of streets and public rights of way	<p>SCC does not consider the proposed drafting achieves the Applicant's aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application.</p> <p>SCC maintains its position, again as set out in "SCC's comments on changes made" in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.</p>	<p>The Applicant has had regard to SCC's comments in respect of Article 15.</p> <p>The Applicant has amended Article 15(9) in the draft DCO (document 3.1 (D)) in accordance with the suggestion made by SCC (the words "<i>Unless otherwise agreed....</i>" having been replaced with "<i>....(or such other period as agreed by the street authority and undertaker)....</i>").</p> <p>This change is documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p> <p>The Applicant maintains its position that the change is both appropriate and pragmatic, particularly when considered in the context of the proposed Framework Highways Agreement.</p> <p>In response to the Council's comments on Article 15(9), and indeed the further provisions in the draft DCO (document 3.1 (D)) where a 28 day determination period is prescribed, the Applicant refers to page 99 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Councils' Local Impact Report [REP3-049].</p> <p>The Applicant therefore respectfully disagrees with the Council and considers that the 28 day determination period should be retained in all instances in the draft DCO.</p> <p>The Applicant has, however, amended Article 15(9) to make clear that the determination period should begin on the date on which an application is received.</p> <p>This change is also documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p>
1d	Article 16, Access to Works	<p>SCC does not consider the proposed drafting achieves the Applicant's aim of allowing the undertaker and street</p>	<p>The Applicant has had regard to SCC's comments in respect of Article 16.</p>

Ref	Matter	Point Raised	Applicant's Comments
		<p>authority to agree an alternative period of time within which the street authority must determine an application.</p> <p>SCC maintains its position, again as set out in "SCC's comments on changes made" in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.</p>	<p>The Applicant has amended Article 16(2) in the draft DCO (document 3.1 (D)) in accordance with the suggestion made by SCC (the words "<i>Unless otherwise agreed....</i>" having been replaced with "<i>....(or such other period as agreed by the relevant planning authority and undertaker)....</i>").</p> <p>This change is documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p> <p>The Applicant maintains its position that the change is both appropriate and pragmatic, particularly when considered in the context of the proposed Framework Highways Agreement.</p> <p>In response to the Council's comments on Article 16(2), and indeed the further provisions in the draft DCO (document 3.1 (D)) where a 28 day determination period is prescribed, the Applicant refers to page 99 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Councils' Local Impact Report [REP3-049].</p> <p>The Applicant therefore respectfully disagrees with the Council and considers that the 28 day determination period should be retained in all instances in the draft DCO.</p> <p>The Applicant has, however, amended Article 16(2) to make clear that the determination period should begin on the date on which an application is received.</p> <p>This change is also documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p>
1e	Article 19, Discharge of Water	<p>SCC does not consider the proposed drafting achieves the Applicant's aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application.</p> <p>SCC maintains its position, again as set out in "SCC's comments on changes made" in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.</p>	<p>The Applicant has had regard to SCC's comments in respect of Article 19.</p> <p>The Applicant has amended Article 19(9) in the draft DCO (document 3.1 (D)) in accordance with the suggestion made by SCC (the words "<i>Unless otherwise agreed....</i>" having been replaced with "<i>....(or such other period as agreed by the person receiving the application and undertaker)....</i>").</p> <p>This change is documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p>

Ref	Matter	Point Raised	Applicant's Comments
			<p>The Applicant maintains its position that the change is both appropriate and pragmatic, particularly when considered in the context of the proposed Framework Highways Agreement.</p> <p>In response to the Council's comments on Article 19(9), and indeed the further provisions in the draft DCO (document 3.1 (D)) where a 28 day determination period is prescribed, the Applicant refers to page 99 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Councils' Local Impact Report [REP3-049].</p> <p>The Applicant therefore respectfully disagrees with the Council and considers that the 28 day determination period should be retained in all instances in the draft DCO.</p>
1f	Article 21, Authority to survey and investigate the land	<p>SCC does not consider the proposed drafting achieves the Applicant's aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application.</p> <p>SCC maintains its position, again as set out in "SCC's comments on changes made" in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.</p>	<p>The Applicant has had regard to SCC's comments in respect of Article 21.</p> <p>The Applicant has amended Article 21(8) in the draft DCO (document 3.1 (D)) in accordance with the suggestion made by SCC (the words "<i>Unless otherwise agreed....</i>" having been replaced with "<i>....(or such other period as agreed by the highway authority or street authority and undertaker)....</i>").</p> <p>This change is documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p> <p>The Applicant maintains its position that the change is both appropriate and pragmatic, particularly when considered in the context of the proposed Framework Highways Agreement.</p> <p>In response to the Council's comments on Article 21(8), and indeed the further provisions in the draft DCO (document 3.1 (D)) where a 28 day determination period is prescribed, the Applicant refers to page 99 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Councils' Local Impact Report [REP3-049].</p> <p>The Applicant therefore respectfully disagrees with the Council and considers that the 28 day determination period should be retained in all instances in the draft DCO.</p>

Ref	Matter	Point Raised	Applicant's Comments
1i	Article 46, Defence to proceedings in respect of statutory nuisance	While SCC considers these changes correct the mismatch between former Article 46(1)(a)(ii) and (3) and Schedule 3, SCC maintains its position in respect of the management plans, as set out in paragraphs 17.57 to 17.58 of the LIR [REP1-045] and in its Comments on Applicant's Comments on Relevant Representations [REP2-013].	<p>The Applicant refers to its response at pages 106-107 (inclusive) of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Councils' Local Impact Report [REP3-049].</p> <p>The Applicant also notes that SCC committed during Issue Specific Hearing 2 held on Wednesday 8 November 2023 to providing tangible examples of details which the Council consider to be missing from the current Management Plans. (See AP4 in the Examining Authority's record of Action Points from Issue Specific Hearing 2 [EV-045]).</p>
1j	Article 47, Traffic regulation	<p>SCC does not consider the proposed drafting achieves the Applicant's aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application.</p> <p>SCC maintains its position, again as set out in "SCC's comments on changes made" in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.</p>	<p>The Applicant has had regard to SCC's comments in respect of Article 47.</p> <p>The Applicant has amended Article 47(8) in the draft DCO (document 3.1 (D)) in accordance with the suggestion made by SCC (the words "<i>Unless otherwise agreed....</i>" having been replaced with "<i>....(or such other period as agreed by the traffic authority and undertaker)....</i>").</p> <p>This change is documented in the Applicant's Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p> <p>The Applicant maintains its position that the change is both appropriate and pragmatic, particularly when considered in the context of the proposed Framework Highways Agreement.</p> <p>In response to the Council's comments on Article 47(8), and indeed the further provisions in the draft DCO (document 3.1 (D)) where a 28 day determination period is prescribed, the Applicant refers to page 99 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Councils' Local Impact Report [REP3-049].</p> <p>The Applicant therefore respectfully disagrees with the Council and considers that the 28 day determination period should be retained in all instances in the draft DCO.</p>
1k	Article 48, Felling or lopping	SCC does not consider the proposed drafting achieves the Applicant's aim of allowing the undertaker and street authority to agree an alternative period of time within which the street authority must determine an application.	<p>The Applicant has had regard to SCC's comments in respect of Article 48.</p> <p>The Applicant has amended Article 48(5) in the draft DCO (document 3.1 (D)) in accordance with the suggestion made</p>

Ref	Matter	Point Raised	Applicant's Comments
		<p>SCC maintains its position, again as set out in “SCC’s comments on changes made” in Row 1, that the relevant period should be 56 days, beginning with the date on which the application is received.</p>	<p>by SCC (the words “<i>Unless otherwise agreed....</i>” having been replaced with “<i>....(or such other period as agreed by the relevant highway authority and undertaker)....</i>”).</p> <p>This change is documented in the Applicant’s Schedule of Changes to the draft DCO (document 8.4.2 (C)).</p> <p>The Applicant maintains its position that the change is both appropriate and pragmatic, particularly when considered in the context of the proposed Framework Highways Agreement.</p> <p>In response to the Council’s comments on Article 48(5), and indeed the further provisions in the draft DCO (document 3.1 (D)) where a 28 day determination period is prescribed, the Applicant refers to page 99 of the Applicant’s Comments on Suffolk County Council and Babergh Mid Suffolk District Councils’ Local Impact Report [REP3-049].</p> <p>The Applicant therefore respectfully disagrees with the Council and considers that the 28 day determination period should be retained in all instances in the draft DCO.</p>
<p>2.1.2 Comments on Unaccompanied Site Inspections undertaken at Deadline 2</p>			
2a	Highways	<p>SCC (Local Highway Authority)’s comments on congestion on the A1071 adjacent to the Beagle Roundabout were in part reflections on ‘local knowledge’ but also the comments made in the transport assessment for DC/21/02671. The traffic function on Google Maps also shows am peak queuing at this location.</p>	<p>The expected traffic impact of the project on the A1071/B1113 roundabout adjacent to the Beagle public house is reported in the Transport Assessment [APP-061] in Table 7.5. This table indicates that the absolute change in traffic expected at the junction during peak construction activity would be relatively modest at an additional 35 vehicles per hour in the peak direction. A high level of contingency was included in this forecast as set out in Chapter 6 of the Transport Assessment [APP-061].</p> <p>This level of project traffic would also only be sustained for a relatively short period of time. Construction traffic generation in the peak month of August 2025 (the basis of the assessment) is forecast to be 7% higher than in any other month in the construction programme, and 13% higher than all but five other months.</p>

Ref	Matter	Point Raised	Applicant's Comments
			The assessment therefore concluded that the impact of project traffic on junction capacity during periods of peak construction activity would not be substantial.

3. Applicant’s Comments on the Submissions from Francis Prosser

3.1 Introduction

3.1.1 Table 3.1 summarises the Applicant’s comments on Francis Prosser’s [AS-008 and REP3-072] submissions.

Table 3.1 – Applicant’s Comments on Francis Prosser’s Submissions [AS-008 and REP3-072]

Reference	Matter	Point Raised	Applicant’s Comments
3.1.1 Comments on Local Impacts Reports			
Page 1 (paragraphs 1 – 4)	Hintlesham and Ramsey Woods	The affected person is surprised by the ‘lack of voice’ on the area around Hintlesham Woods and Ramsey Wood and how the proposed stretch of 3km-4km of line is not mentioned in the LIR summaries. The affected person claims the ecological and environmental surveys are ‘highly selective, even sporadic, with tenuous concluding arguments’.	The ecological field surveys undertaken for the project are detailed in Table 7.2 of ES Chapter 7 Biodiversity [APP-075]. The Applicant refers to its response reference 6 in Table 4.4 of the Applicant’s Comments on Written Representations [REP3-048].
Page 1 – 2 (paragraphs 6 – 8)	Hintlesham and Ramsey Woods	The affected person feels the decision and reasoning to adopt option 1 (the new lines to the north and west of Ramsey woods) is not at all the “least worst” in terms of impact. The affected party has asked PINS to take into account that affected parties care deeply about all aspects of the area including environment, visual and amenity.	The Applicant refers to its response reference 3.2 in Table 4.4 of the Applicant’s Comments on Written Representations [REP3-048]. For the review of options around Hintlesham Woods, please see Table 3.7 of the ES Chapter 3: Alternatives Considered [APP-071]. As stated in Section 3.7, the Applicant decided to take forward Option 1 based on consultation feedback and engagement with stakeholders and landowners, the finding of environmental surveys and the presence of rare and protected species in the woodland (including a maternity roost for barbastelle bats), landscape and visual impact, and further design and engineering studies. When balancing these considerations against national planning policy and the Applicant’s licence obligations Option 1 was considered the least environmentally constrained option.

Reference	Matter	Point Raised	Applicant's Comments
			<p>As both ancient woodland and Sites of Special Scientific Interest (SSSI) are given substantial weight in the decision-making process, Option 2 carried a high risk of conflict with National Policy and an increased risk that the project would not be granted consent.</p> <p>Following discussions with Natural England there was also a risk that Option 2 would fail to meet the 'no satisfactory alternative' test that is needed to receive European Protected Species licences for the work, knowing that Option 1 would provide for lesser effects than Option 2. Even if that test could be met, there was concern regarding the habitat fragmentation effects of having parallel overhead lines (and their associated operational safety clearances) in this woodland.</p>
Page 2 (paragraph 7 - 9)	Hintlesham and Ramsey Woods	The affected person believes that the new additional lines would amplify the visual disturbance along the A1071, bisecting two wonderful SSSI wildlife reserves and near a third, between which much wildlife travels. The affected person states that a lot of weight has been placed locally on the visual aspects around historical/cultural sites such as Hintlesham Hall and Benton End, but not enough on the woodland.	The Applicant refers to its response reference 7 in Table 4.4 of the Applicant's Comments on Written Representations [REP3-048]. Table 6.3 of ES Chapter 6: Landscape and Visual [APP-074] acknowledges that there would be moderate adverse effects (significant) from the new section of 400kV overhead line to the north of Ramsey Wood to some parts of the Hintlesham community area. However, the landscape is not designated at this location, unlike the SSSI and ancient woodland.
Page 2 (paragraph 10 - 11)	Benton End	The affected person believes Benton End also has artistic and cultural importance which needs protecting in the best way.	The Applicant refers to its response reference 6.135-6.138 in the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Reports [REP3-049].
Page 2 (paragraph 12)	Ungrounding & Holford Rules	The affected person states that very little has been discussed about the relative merits of undergrounding compared to aerial lines, when the huge Hintlesham site is specifically to preserve aerial creatures. The affected person believes the Applicant is in breach of Holford Rules by not properly considering alternatives, such as undergrounding.	<p>The Applicant refers to its response reference 3.2 and 4 in Table 4.4 of the Applicant's Comments on Written Representations [REP3-048].</p> <p>The Applicant has carefully considered which transmission technology is appropriate in this location, Table 3.6 of the ES Chapter 3: Alternatives Considered [APP-071] summarises the key environmental factors considered. National Policy Statement (NPS) EN-5 acknowledges that overhead lines are appropriate in many instances, but that there may be specific locations where underground cables are appropriate depending on the sensitivity of the baseline environment.</p>

Reference	Matter	Point Raised	Applicant's Comments
			Apart from Dedham Vale AONB and Stour Valley, the higher cost of cables to bill paying consumers, and the environmental implications of installing underground cables and maintaining them, are not considered to be justifiable in the context of national policy of the Applicant's statutory duties.
Page 2 (paragraph 13-14)	Ramsey Woods	The affected person makes note of the LIR statement that <i>"planning decisions need to recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland"</i> (6.48b)" I would ask how this will be achieved by the plans for a new line around the exceptional Ramsey Wood.	<p>The decision as to whether development consent is to be granted will rest with the Secretary of State, having regard to the recommendation report which will be written by the Examining Authority after the Examination closes.</p> <p>The Applicant recognises that there are many factors that will need to be considered by the Secretary of State as part of the planning balance, as set out in the Planning Statement [APP-160].</p>
Page 3 (Paragraph 15)	Independent Survey	The affected person asks that an independent survey of the kind done for other parts of the proposed line, be commissioned for Hintlesham and Ramsey Woods and the routes of new lines around them.	The ecological field surveys undertaken for the project are detailed in Table 7.2 of ES Chapter 7 Biodiversity [APP-075]. A standard approach to surveys was undertaken for the order limits and was developed by the appointed project ecologists in consultation with relevant organisations based on the types of species that could be utilising the identified habitats and the parameters of the project. Baseline Survey Reports were submitted with the application for development consent.

3.1.2 Comments on Francis Prosser Deadline 3 Submission

Page 2	Proposed temporary access and use of land off A1071	The affected person states that the Applicant is now seeking access rights for 40 years, as opposed to the previously stated five years and argues that the effects of this access would be permanent as a result of loss of ancient hedgerow, ditch and change in use of land.	The rights sought over the land within the affected person's land (Plot 6-30 shown on the Land Plans [REP1-004] and Access Point AB-EAP2a shown on the Access Rights of Way and Public Rights of Navigation Plans [APP- 012]) remain temporary in nature (a period of five years). As far as the specific plots in the affected person's land are concerned, the Applicant is proposing the use of an existing access point. The nature of the access is such as to accommodate vehicles, for mitigation and compensatory planting only on land adjacent to the affected person's ownership. An existing gap in the vegetation is proposed to be used for access, temporary culverts would be installed should they be required, although the Applicant notes that this is an existing access track.
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Reference	Matter	Point Raised	Applicant's Comments
Page 2	Need for proposed temporary access, including alternative to proposed temporary access, and use of land off A1071	<p>The affected person states that <i>the access as shown on plans would be completely unnecessary and not be required in order to access any environmental areas at ENV04 as shown in the General Arrangement Plans [APP-018].</i></p> <p>The affected person states that <i>there are better, safer and closer access points e.g. at plot number 6-49 for example, and which would not affect residents Nor unnecessarily run over 300m across arable fields, skirting around the back of a section of ancient woodland (with nesting birds and mammals).</i></p>	<p>The Applicant looks to utilise existing accesses wherever possible rather than construct new ones; therefore, Access Point AB-EAP2a shown on the Access Rights of Way and Public Rights of Navigation Plans [APP- 012] is preferable and would be used when implementing (installing) the mitigation and compensatory planting.</p> <p>Access Point AB-EAP2b shown on the Access Rights of Way and Public Rights of Navigation Plans [APP- 012] in land plot 6-49 is within an existing and operational layby. The Applicant would look to limit the works required at this location to lessen the disruption to the use of the layby by highway traffic during the construction period. This access point (AB-EAP2b) is required from the layby for future maintenance requirements which would involve infrequent visits.</p> <p>Mitigation for Ancient Woodland (including Keeble's Grove) is set out in REP3-046 Technical Note on Ancient and Potential Ancient Woodland. Embedded measure EM-AB16 set out in the Register of Environmental Actions and Commitments (REAC) [REP3-028] states that the temporary access route adjacent to Keeble's Grove will not be topsoil stripped to avoid impacts to the root protection area of this woodland.</p>
Page 2	Scale of proposed temporary access and use of land off A1071	<p>The affected person states they are in discussion with the Applicant regarding a possible voluntary agreement, but notes <i>'the area shown (estimate around 30-40m of track) is unnecessarily large/long'..</i> It is elaborated that <i>'the proposed area shown would look to involve removal of a section of an estimated 10- 20m of ancient hedgerow and important drainage ditch, which is also an important corridor link between two SSSI sites. This would also be unnecessary'.</i></p> <p><i>'The current access arrangement to the field is presently used by all types of agricultural equipment and would be more than adequate for the type of activity such an area would require'.</i></p>	<p>Embedded measure EM-AB16 set out in the [REP3-028] states that the temporary access route adjacent to Keeble's Grove will not be topsoil stripped in order to avoid impacts to the root protection area of this woodland. As shown on Sheet 6 of the Landscape and Ecological Management Plan (LEMP) Appendix A: Vegetation Retention and Removal Plans [REP3-036], the vegetation management with regards to the access at Site Refs: 6-30 and 6-31 as shown on the Land Plans (document 2.3(B)) would be limited to some pruning of the line of trees along the westbound carriageway of the A1071. No permanent loss of vegetation or drainage ditch is proposed in this location. The track utilises an existing gap in the vegetation.</p>

Reference	Matter	Point Raised	Applicant's Comments
Page 2	Land impact of proposed temporary access and use of land off A1071	The affected person raises concern over removing 1800sqm of farmland as a result of the access route and leaving a strip of farmed land between the access route and the wood/hedge making it un-usable.	<p>The Order Limits have been developed to utilise an existing access point off the highway, an existing gap in vegetation and an access used by agricultural machinery. The positioning of the access route avoids effects on the trees at Keeble's Grove which is designated as Ancient Woodland and SSSI. Proposed measures for Ancient Woodland (including Keeble's Grove) is set out in REP3-046 Technical Note on Ancient and Potential Ancient Woodland. Embedded measure EM-AB16 set out in the REAC [REP3-028] states that the temporary access route adjacent to Keeble's Grove will not be topsoil stripped to avoid impacts to the root protection area of this woodland.</p> <p>The remaining farmland can continue to be farmed. Impacts on Agricultural Operations and Viability are assessed in ES Chapter 11: Agriculture and Soils [APP-079] and as stated, impacts on Agricultural Operations and Viability during construction and operation are assessed to be not significant.</p>
Page 2	Proposed temporary access and use of land off A1071	The affected person asks that access route 6-21 / ENV19 is reconsidered or for further discussion as to what the planting plans would be. The affected person notes that without 6-21, 6-29 would not be required.	<p>Plot 6-21 (ENV 19) is proposed Landscape Softening for the benefit of Rams Farm as shown on Sheet 6 of LEMP Appendix B: Vegetation Reinstatement Plans [REP3-036].</p> <p>Although these softening areas are not required to offset a significant effect within the ES, the planting could soften the views of the project from specific properties identified in the community assessment. As noted in paragraph 2.8.11 of the designated NPS EN-5 and paragraph 2.10.6 of the Draft NPS (March 2023), the landscape softening would be discussed with the relevant landowners, who may choose to decline the landscape softening proposals. Plot 6-29 provides for access to implement and maintain this planting provision should it be agreed with the landowner.</p> <p>Response reference 6.114-6.117 in the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report [REP3-049] sets out that under paragraph 8.4.9 of the LEMP [REP3-036] the Vegetation Reinstatement Plan [REP3-036], which is secured through Requirement 9 (reinstatement planting plan) of the draft DCO (document 3.1 (D)) identifies areas for potential 'landscape softening' which would provide screening for visual receptors.</p>

Reference	Matter	Point Raised	Applicant's Comments
Page 3	Consultation on proposed temporary access and use of land off A1071	The affected person states that the planned access for land off A1071 was not included in the Applicant's consultation process or plans. Additionally, they state that they were not informed directly by the Applicant of the intentions for the area including their property and have not received direct notice from the Applicant of plans to formally seek temporary access.	<p>As a result of feedback received during its statutory consultation in spring 2022 and further technical studies, the Applicant made some further changes to the proposals and held a targeted consultation from 8 September 2022 to 7 October 2022. The amended General Arrangement Plans (Targeted Consultation) and Changes to Order Limits Plans presented at this targeted consultation can be found in Appendix K of the Consultation Report [APP-054], which shows the access off the A1071.</p> <p>Where revisions to the draft Order Limits resulted in new landowners being affected by its proposals, the Applicant wrote to these landowners directly. The Applicant can confirm a consultation letter was sent to the Mr Prosser on 2 September 2022.</p> <p>Table 2.3 of the Applicant's Comments on Relevant Representations [REP1-025] sets out the Applicant's comments on the scope and rationale of the targeted consultation held in autumn 2022 and Table 4.4 of the Applicant's Comments on Written Questions [REP3-048] sets out the Applicant's comments on the advertisement of the targeted consultation.</p>
Page 3 - 4	Changes to definitions	<p>The Interested Party claims that the plans have changed, since the start of the Examination.</p> <p>The Interested Party states that they have been reassured by the Applicant that ENV04 would be for accessing planting/habitat areas only and would not be used for construction or industrial equipment.</p> <p>However, ENV04 was explained to the Interested Party Biodiversity Net Gain but is now called 'environmental areas' potentially allowing scope for change of use of land to what the Applicant may deem as class 2. The Interested Party does not believe it is proper or fair to make changes or include 'updates' in this way.</p>	<p>The Applicant can confirm that the proposed use of the land at ENV04 (shown as MM09 on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-036]) has not changed since the start of the Examination and remains as described under Additional Mitigation EIA_B01 in the REAC [REP3-028].</p> <p>The Applicant refers to its response reference 8 in Table 4.4 of the Applicant's Comments on Written Representations [REP3-048].</p>
Page 4	Access rights	The Interested Party states that BT/OpenReach have right of access for their equipment on this track along with Anglian Water, the Royal	The Applicant has re-examined plots 6-21 and 6-29 and they do not cover the access track on the land in question, therefore the Applicant has removed the RSPB rights of access as suggested by

Reference	Matter	Point Raised	Applicant's Comments
		Society for the Protection of Birds (RSPB) does not have access or other rights over adjacent areas 6-29 or 6-21, as indicated in the Book of Reference [REP3-039].	the affected person. This has been reflected in the Book of Reference, submitted at Deadline 4 (document 4.3 (D)).
Page 5 (1)	Biodiversity Net Gain (BNG)	The Interested Party questions ' <i>how satisfied can we be that the Bio-diversity rules – understood to be part of the Environment Act 2021 and to be phased in from November this year – are being and will be applied correctly to this scheme, especially as they are new. (How) do they apply to this scheme?</i>	The Applicant refers to its response under reference DC1.6.95 in the Applicant's Responses to First Written Questions [REP3-052].
Page 5 (2)	BNG calculations	The Interested Party questions how the loss of biodiversity resulting from the new pylons and associated line has been calculated, and how this is to be offset in addition to an additional 10% BNG.	<p>As stated in the Environmental Gain Report [APP-176], the Applicant has used the Defra Metric 3.1 to calculate the vegetation loss that would result from the project and also to calculate how the additional 10% net gain would be achieved.</p> <p>Impacts on biodiversity from the project, are assessed and reported in ES Chapter 7: Biodiversity [APP-075]. Planting proposals, including additional mitigation and biodiversity compensation are shown on LEMP Appendix B: Vegetation Reinstatement Plans (document 7.8(B)). It should be noted that planting at ENV04 (shown as MM09 on LEMP Appendix B: Vegetation Reinstatement Plan [REP3-034]).is for mitigation and compensation purposes rather than for a Biodiversity Net Gain.</p> <p>As stated under reference CA1.4.18 in the Applicant's Responses to First Written Questions [REP3-052], BNG is not included within the ES or Management Plans. BNG is covered within the Environmental Gain Report [APP-176] and is secured via Requirement 13 of the draft DCO (document 3.1 (D)). As stated in paragraph 7.1.2 of the Environmental Gain Report [APP-176], the environmental areas have been designed to demonstrate a proposal that is capable of delivering at least a 10% BNG on the project.</p>
Page 5 (3)	BNG	The Interested Party questions how the natural environment will be in a better state with the addition of new lines.	The Applicant refers to its response under reference CA1.4.18 in the Applicants Responses to First Written Questions [REP3-052] and the Environmental Gain Report [APP-176].

Reference	Matter	Point Raised	Applicant's Comments
Page 5 (4)	BNG	The Interested Party has questioned why some areas such as ENV04 / 6-24, originally intended and submitted as for BNG, have a definitional change of use, as shown in the submitted plans, since the start of the examination.	The Applicant refers to its response reference 8 in Table 4.4 of the Applicant's Comments on Written Representations [REP3-048].
Page 5 (5.1)	Desk Studies	The Interested Party questions whether desk research is sufficient for large areas of important, affected protected or otherwise notable habitats and species, as stated for much of the area within 1km of Order Limits.	<p>The biodiversity assessment has been informed by both desk based assessment and detailed site surveys in and around Hintlesham Woods SSSI. Impacts on biodiversity from the project, are assessed and reported in ES Chapter 7: Biodiversity [APP-075]. This also describes the methodology for the assessment which is in accordance with the Planning Inspectorate's Scoping Opinion [APP-159], best practice and discussions with relevant environmental bodies.</p> <p>The Applicant refers to its response reference 6 in Table 4.4 of the Applicant's Comments on Written Representations [REP3-048].</p>
Page 5 (5.2)	Ramsey Wood	The Interested Party does not believe that enough detail has been done on or understanding of where the proposed new lines north and west of Ramsey Wood are going to be placed.	<p>The ecological field surveys undertaken for the project are detailed in Table 7.2 of ES Chapter 7 Biodiversity [APP-075]. A standard approach to surveys was undertaken for the Order Limits and was developed by the appointed project ecologists in consultation with relevant environmental bodies. The methodology was based on the types of species that could be utilising the identified habitats and the parameters of the project. Baseline Survey Reports were submitted with the application for development consent.</p> <p>The Applicant refers to its responses under references 3.2 4, and 6 in Table 4.4 of the Applicant's Comments on Written Representations [REP3-048].</p>

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