



Suffolk County Council (20041323)

Comments on any other submissions
received at Deadline 5

Bramford to Twinstead (EN020002)

Deadline 6

20 December 2023

Table of Contents

Glossary of Acronyms	2
Purpose of this Submission	2
1 Comments on any other submissions received at Deadline 5	3
7.10 (B) Outline Written Scheme of Investigation (Clean) [REP5-016]	3
8.4.2 (D) Applicant’s Schedule of Changes to the Draft Development Consent Order (Tracked) [REP5-021]	4

Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Orders</i>
<i>DVNLSVP</i>	<i>Dedham Vale National Landscape and Stour Valley Partnership</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>ExQ</i>	<i>Examining Authority’s Written Questions</i>
<i>ISH</i>	<i>Issue Specific Hearing</i>
<i>LHA</i>	<i>Local Highway Authority</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>SuDS</i>	<i>Sustainable Drainage Systems</i>

“The Council” / “SCC” refers to Suffolk County Council; “The Host Authorities” refers to Suffolk County Council, Babergh and Mid Suffolk District Councils, Essex County Council, and Braintree District Council.

Purpose of this Submission

The purpose of this submission is to provide responses to the Applicant’s Deadline 5 (D5) submissions and representations made by other interested parties at D5, as appropriate. Examination Library references are used throughout to assist readers.

1 Comments on any other submissions received at Deadline 5

7.10 (B) Outline Written Scheme of Investigation (Clean) [REP5-016]

Table 1: SCC Table of Comments on the Deadline 5 OWSI [REP5-016]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
1a	Archaeology	7.10(b)	Outline Written Scheme of Investigation	<p>The Outline Written Scheme of Investigation has not been approved. SCC (Archaeology) and Essex Place Services are working on joint comments for the document which will be provided to the applicant prior to deadline 7. The joint comments will be submitted for the EXA at deadline 7.</p> <p>Further, SCC (Archaeology) and Essex Place Services are working on joint comments for the Historic Environment sections of the REAC.</p>

8.4.2 (D) Applicant’s Schedule of Changes to the Draft Development Consent Order (Tracked) [REP5-021]

- 1.1 At Deadline 5 (1 December 2023), National Grid Electricity Transmission plc (“**the Applicant**”) submitted, amongst other documents, the Applicant’s Schedule of Changes to the Draft Development Consent Order [REP5-021] (“**the Schedule of Changes**”).
- 1.2 The Schedule of Changes sets out, in Table 4.1, the changes made to Version D of the draft Development Consent Order (“dDCO”) [REP4-015] in Version E of the dDCO [REP5-006].
- 1.3 In this document, SCC has taken the text from the first four columns of Table 4.1 (excluding column 1 which uses SCC’s own table reference numbering) and added a new, fifth, column in which SCC has added its comments on each of the changes.

Table 2: SCC Table of Comments on 8.4.2 (D) Applicant’s Schedule of Changes to the dDCO (Tracked) [REP5-021]				
Ref.	dDCO Ref.	Rationale for the Change	Change Made	SCC’s Comments on Changes Made
2a	Art. 2 (interpretation)	Interpretation The definitions of ‘Archaeological Framework Strategy’ and ‘Outline Written Scheme of Investigation’ have been amended to reference the fact that both documents are now listed in Schedule 17 (Certified Documents) for the purposes of Article 57. This change responds to Item 4.1b in Suffolk County Council’s Post-Hearing Submission for the Second Issue Specific Hearing (ISH2) on the draft Development Consent	<p>“Archaeological Framework Strategy” means the document of that description (Document 7.9), <u>certified by the Secretary of State as the Archaeological Framework Strategy for the purposes of this Order under article 57 (certification of documents)</u>, identifying steps to mitigate predicted effects on archaeology, geo-archaeology, palaeo-environmental and historic landscape heritage assets during construction of the authorised development;</p> <p>“Outline Written Scheme of Investigation” means the</p>	SCC has no comment on these changes.

		<p>Order and Related Matters [REP4-043]. Reference is also made in this context to the Applicant’s Comments on Other Submissions Received at Deadline 4 (Document 8.7.3).</p> <p>A consequential amendment has been made to Schedule 17 (Certified documents) (to which see Change Ref. 6 below).</p>	<p>document of that description (Document 7.10) <u>(B)</u>, <u>certified by the Secretary of State as the Outline Written Scheme of Investigation for the purposes of this Order under article 57 (certification of documents)</u>, setting out the proposed approach to archaeological mitigation and investigations to be undertaken in association with the construction of the authorised development;</p>	
2b	<p>Art. 57 (certification of documents)</p>	<p>Minor amendments have been made to subparagraphs (1) and (3) of Article 57.</p> <p>These amendments respond to Item 4.1b in Suffolk County Council’s Post-Hearing Submission for the Second Issue Specific Hearing (ISH2) on the draft Development Consent Order and Related Matters [REP4-043].</p> <p>Reference is also made in this context to the Applicant’s Comments on Other Submissions Received at Deadline 4 (Document 8.7.3).</p>	<p>57.—(1) National Grid must, as soon as practicable after the making of this Order, submit to the Secretary of State copies of the documents and plans <u>and documents</u> identified in Schedule 17 (Certified Documents) of this Order for certification that they are <u>as</u> true copies of the<u>those plans and</u> documents referred to in this Order.</p> <p>(2) A plan or document so certified is admissible in any proceedings as evidence of the contents of the document of which it is a copy.</p> <p>(3) Where any plan or document set out<u>identified</u> in Schedule 17</p>	<p>SCC has no comment on these changes.</p>

			<p>(Certified Documents) requires <u>is required</u> to be amended to reflect the terms of the Secretary of State’s decision to make this Order, that plan or document in the form amended to the Secretary of State’s satisfaction is the version of the plan or document required to be certified under paragraph (1).</p>	
2c	<p>Schedule 3, Requirements (Requirement 7)</p>	<p>A new sub-paragraph (2) has been included in Requirement 7 (Construction hours). Sub-paragraph (2) provides that no percussive piling operations are permitted to take place on Sundays and Bank Holidays. This change reflects further work undertaken by the Applicant, in response to submissions made by the host authorities and matters raised by the Examining Authority, regarding the reduction of potential disturbance to local communities during construction of the authorised development. Reference is also made in</p>	<p>7. —(1) Subject to sub-paragraphs (2) and to (34), work may only take place between 0700 and 1900 Monday to Friday and between 0800 and 1700 on Saturdays, Sundays and Bank Holidays (the core working hours), unless otherwise approved by the relevant planning authority. <u>(2) No percussive piling operations may take place on Sundays and Bank Holidays.</u> <u>(3) (4)</u> The following operations may take place outside the core working hours referred to in sub-paragraph (1)—</p>	<p>A detailed discussion of this Requirement will be included in SCC’s D7 submissions which will address matters from the ISH5 Agenda which were not dealt with at that ISH (the discussion of R7 falls within SCC’s response to Item 9).</p>

		<p>this context to the Applicant’s Comments on Other Submissions Received at Deadline 4 (Document 8.7.3).</p>		
2d	<p>Schedule 3, Requirements (Requirement 11)</p>	<p>A new sub-paragraph (3) has been included in Requirement 11 (Highway works). Sub-paragraph (3) provides that all ‘pre- commencement operations’ (as defined in Article 2(1)) involving the construction or alteration of temporary accesses must be carried out in accordance with sub-paragraphs (1) and (2) of Requirement 11 unless otherwise agreed with the relevant highway authority. This change responds to submissions made in the Applicant’s Comments on Responses to First Written Questions [REP4-029] and further engagement with Suffolk County Council since Deadline 4.</p>	<p>11.—(1) No work to construct, alter or temporarily alter any new or existing means of access to a highway to be used by vehicular traffic may commence until written details of design, layout and reinstatement of that means of access has been submitted to and approved by the relevant highway authority. (2) The highway accesses must be constructed and reinstated in accordance with the details approved under sub-paragraph (1). <u>(3) For the avoidance of doubt, all pre-commencement operations involving the construction or alteration of temporary accesses must be carried out in accordance with sub-paragraphs (1) and (2) unless otherwise agreed with the relevant highway authority</u> (4) (2) The undertaker must carry out road safety audits of the highway works authorised by this</p>	<p>A detailed discussion of this Requirement will be included in SCC’s D7 submissions which will address matters from the ISH5 Agenda which were not dealt with at that ISH (the discussion of R7 falls within SCC’s response to Item 9).</p>

			Order in accordance with Standard GG 119 Road Safety Audit (Revision 2) of the Department for Transport’s Design Manual for Roads and Bridges or in accordance with any standard that supersedes that Standard and must, to the reasonable satisfaction of the highway authority, implement any recommendations to mitigate or remove road safety problems and defects identified in any such road safety audits arising out of the authorised development.	
2e	Schedule 14, Protective Provisions (Part 5)	A new Part 5 of Schedule 14 includes Protective Provisions for the protection of Cadent Gas Limited as gas undertaker. The Protective Provisions included in Part 5 are agreed subject to completion of a Side Agreement which it is anticipated will make provision for certain matters raised in Cadent Gas Limited’s Relevant Representation [RR-024] and Written Representation [REP2-020].	<p><u>PART 5</u> <u>FOR THE PROTECTION OF</u> <u>CADENT GAS LIMITED AS GAS</u> <u>UNDERTAKER</u></p> <p>No further text copied as Cadent’s PPs are not relevant to SCC.</p>	SCC has no comment on these changes.

		Reference is made in this context to the Applicant’s Protective Provisions and Commercial Side Agreements Tracking List (Document 8.7.8).								
2f	Schedule 17, Certified Documents	Certified Documents The ‘Archaeological Framework Strategy’ and ‘Outline Written Scheme of Investigation’ have been included in the list of documents to be certified for the purposes of Article 57. This is a consequential amendment which relates to Change Ref. 1 above.	<table border="1"> <tr> <td>Landscape and Environmental Management Plan</td> <td>1.1 7.8 (B)</td> </tr> <tr> <td><u>Archaeological Framework Strategy</u></td> <td><u>7.9</u></td> </tr> <tr> <td><u>Outline Written Scheme of Investigation</u></td> <td><u>7.10 (B)</u></td> </tr> </table>	Landscape and Environmental Management Plan	1.1 7.8 (B)	<u>Archaeological Framework Strategy</u>	<u>7.9</u>	<u>Outline Written Scheme of Investigation</u>	<u>7.10 (B)</u>	SCC has no comment on these changes.
Landscape and Environmental Management Plan	1.1 7.8 (B)									
<u>Archaeological Framework Strategy</u>	<u>7.9</u>									
<u>Outline Written Scheme of Investigation</u>	<u>7.10 (B)</u>									