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Bramford to Twinstead Reinforcement

Volume 7: Other Documents

Document 7.3.1 (C): Draft Statement of Common Ground Local Authorities

Final Issue C
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Version History

Date	Issue	Status	Description / Changes
April 2023	A	Final	For DCO submission.
25 September 2023	B	Final	Updates to all sections of the Draft SoCG to reflect on-going discussions with the Consultee, for submission at Examination Deadline 1.
20 December 2023	C	Final	Updates to all sections of the Draft SoCG to reflect on-going discussions with the Consultee, for submission at Examination Deadline 6.

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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 or parties. It sets out matters of agreement between both/all 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'/the Applicant) and Essex County Council (ECC), Suffolk County Council (SCC), Babergh and Mid Suffolk District Councils (BMSDC) and Braintree District Council (BDC) (together referred to in this SoCG as the 'Host Authorities') relating to the application for development consent for the Bramford to Twinstead Reinforcement. 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 the matters agreed and matters under discussion between the Applicant and ECC, SCC, BDC and BMSDC. This SoCG has evolved as the application progressed to submission and through examination.
- 1.1.5 Individual SoCG meetings were held week commencing 13 December 2021 with the individual host authorities. General feedback received during the sessions included the suggestion from SCC that the Host Authorities sign a prepare a joined-up SoCG. Subsequently, all Host Authorities agreed at the meeting held on the 6 April 2022 to merge the SoCG, although ensure the SoCG has space to record if there is any divergence between the parties on any topic.

1.2 Description of the Project

- 1.2.1 The Applicant has submitted an 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 the Applicant 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 (PRoW), 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 the Applicant's commitments to Biodiversity Net Gain (BNG).

1.3 This Statement of Common Ground

- 1.3.1 For the purpose of this SoCG, the Applicant and the Host Authorities will jointly be referred to as the 'Parties'. When referencing individual Host Authorities, they will be referred to as 'the Consultee' or by their name.
- 1.3.2 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 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 under discussion where agreement between the Parties has not yet been reached.
 - Section 6 includes the signing off sheet.
- 1.3.3 Throughout the SoCG:
- Section 2 details engagement undertaken between the Parties. The far-right column in Table 2.1 (pre-application) and Table 2.2 (post submission), indicates which of the

parties were in attendance at the time of the meeting; a coloured blue box indicates attendance to such meeting.

- Where a section begins 'matters agreed' (Section 3), this sets out matters that have been agreed between the Parties and where there is no dispute or very small areas of divergence between the Host Authorities, but they are largely in agreement. Where there are small areas of divergence, this is indicated with a Red or Amber warning in the far-right column, with explanatory text on the divergence in the preceding columns. Green indicates no apparent diversion on the topic. Any greyed-out column reflects circumstances where the Party has no comment to make on the matter, for example where the element of the scheme considered, falls outside the Parties jurisdiction.
- Where a section begins 'matters not agreed' (Section 4), this sets out matters that are not agreed between the Parties and where a difference of opinion remains.
- Where a section begins 'matters under discussion' (Section 5), this sets out matters that are subject to further negotiation between the Parties.

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2. Record of Engagement

2.1 Role of the Consultee in the process

2.1.1 The Consultees are local authorities for the purposes of section 42(1)(b) of the Planning Act 2008 as some of the land covered by the project is within their local authority area. Pursuant to Section 42 of the Planning Act 2008, the Applicant must consult local authorities if the project is in the local authority's area(s).

2.1.2 The Consultees have been strongly encouraged to discuss and work with the Applicant to provide a local perspective at the pre-application stage of the application process for the project.

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	E	S	B	B
			C	C	M	D
			C	C	S	D
			C	C	D	C
			Attendance			
21 August 2020	Project Update	Reintroduction to the scheme including need case and wider regional context.				
15 December 2020	Project Update	Virtual meeting to introduce the scheme to the Consultee including a Q&A session.				
1 March 2021	Project Update including Cumulative Effects	Virtual meeting to provide a scheme update and to discuss feedback on the consultation strategy, SoCGs, local planning policy, approach to cumulative effects assessment, Planning Performance Agreement (PPA). Included a Q&A session.				
2 March 2021	Ecology	Virtual meeting to introduce the scheme and to discuss approach to Environmental Impact Assessment (EIA) Scoping, baseline environment, further surveys and SoCGs.				
2 March 2021	Traffic and Transport	Virtual meeting to introduce the scheme and to discuss approach to EIA Scoping, baseline environment, further surveys and SoCGs.				
3 March 2021	Landscape and Visual	Virtual meeting to introduce the scheme and to discuss approach to EIA Scoping, baseline environment, further surveys and SoCGs.				
4 March 2021	Air Quality Noise and Vibration Socio-economics, tourism and recreation	Virtual meeting to introduce the scheme and to discuss approach to EIA Scoping, baseline environment, further surveys and SoCGs.				

Date	Topic	Discussion points	E	S	B	B
			C	C	M	D
			C	C	S	C
			Attendance			
	Health and wellbeing					
10 March 2021	Water Environment	Virtual meeting to provide an update on the proposed scope and methodology, discuss current assessment work, proposed design and mitigation and SoCGs.				
May 2021	Response to non-statutory consultation	The Consultees provided their responses to the non-statutory consultation to the Applicant in letter format.				
19 May 2021	Cultural Heritage	Virtual meeting to introduce the scheme and to provide an update on the proposed scope and baseline/ survey work, discuss current assessment work, proposed archaeological mitigation and SoCGs.				
26 May 2021	Landscape and Visual	Virtual meeting to provide an update on the proposed scope and methodology (including viewpoints), discuss current assessment work, proposed mitigation and enhancements and SoCGs.				
7 June 2021	Scheme Update including Cumulative Effects	Virtual meeting to provide a scheme update and to discuss non-statutory consultation feedback, EIA scoping, environmental surveys and Preliminary Environmental Information Report (PEIR), review of Energy National Policy Statements (NPSs), discharge of requirements, approach to cumulative effects assessment and PPA. Included a Q&A session.				
29 June 2021	Layham Quarry	Virtual meeting to discuss the current and future status of mineral extraction operations at Layham Quarry and to resolve outstanding queries regarding development allocations at Layham Quarry. The approach to the PPA was also briefly discussed.				
June 2021	EIA Scoping Response	The Consultees provided their responses to the EIA Scoping Report to the Planning Inspectorate in letter format.				
7 July 2021	Statement of Community Consultation (SoCC) Cumulative Effects Assessment	Virtual meeting to introduce the SoCC framework and plans for consultation in summer 2021. Virtual meeting to discuss the long list of development to inform the Cumulative Effects Assessment in the PEIR.				
12 July 2021	Water Environment	Virtual meeting to provide scheme update and an update on the Scoping work. Discussion on the approach to the water assessment, Water Framework Directive screening assessment, Flood Risk Assessment (FRA), hydrogeology and geology assessment, incorporation of climate change allowances in assessments and SoCGs.				
11 August 2021	Planning/ GSP Substation	Pre-application meeting (virtual) held with BDC and Essex Place Services (EPS) to discuss the intended Town and Country Planning Act (TCPA) Planning Application for the proposed GSP substation.				
3 September 2021	Archaeology	Meeting with Richard Havis who will now be representing all Local Authorities on Cultural Heritage matters and suggested that he has his own SOCG.				
6 September 2021	Scheme Update	Virtual meeting to provide a scheme update and to discuss the SoCC, SoCG, DCO discharge requirements and PPA. Included a Q&A session				

Date	Topic	Discussion points	E	S	B	B
			C	C	M	D
			C	C	S	D
			Attendance			
6 September 2021	Planning/ GSP Substation	Written pre-application advice issued by BDC.				
8 September 2021	Ecology	The Applicant provided a project update and technical discussions around surveys, BNG and Habitats Regulations Assessment.				
9 September 2021	Traffic and Transport	The Applicant provided a project update and technical discussions around traffic surveys and the preliminary outputs of the initial traffic assessment.				
13 September 2021	Water	The Applicant provided a project update and technical discussions around the water assessment and the scope of the FRA.				
16 September 2021	Landscape and Visual	The Applicant provided a project update and technical discussions around NPS updates, Special Landscape Areas, Viewpoints, Photomontages, Community areas and BNG.				
4 October 2021	Socio-economic	Discussion on skills and tourism impacts/benefits associated with the project.				
22 November 2021	Planning/ Scheme Update	General project update. Discuss plans for statutory consultation				
25 November 2021	Net Gain Workshop	Introduction to Biodiversity (and wider environmental) Net Gain opportunities being considered.				
14 December 2021	Planning/SoCG and Committed Development	Individual Host Authority (SCC) meeting to progress the SoCG and Long List of Development.				
15 (1) December 2021	Planning/SoCG and Committed Development	Individual Host Authority (ECC) meeting to progress the SoCG and Long List of Development.				
15 (2) December 2021	Planning/SoCG and Committed Development	Individual Host Authority (BMSDC) meeting to progress the SoCG and Long List of Development.				
16 December 2021	Planning/SoCG and Committed Development	Individual Host Authority (BDC) meeting to progress the SoCG and Long List of Development.				
7 February 2022	Planning	Discuss how statutory consultation is going and key themes raised.				
22 February 2022	Planning/GSP Substation	Second pre-application meeting (virtual) held with BDC to discuss the intended TCPA Planning Application for the Proposed GSP Substation.				
16 March 2022	Ecological Surveys	A meeting with the EPS ecology consultant to discuss ecology surveys who represents all Consultees.				
March 2022	Response to statutory consultation	The Consultees provided their responses to the statutory consultation to National Grid in letter format.				
30 March 2022	Thematic Meeting:	General project update. Discuss results of surveys and feedback from statutory consultation.				

Date	Topic	Discussion points	E	S	B	B
			C	C	M	D
			C	C	S	D
			Attendance			
	Ecology (general)					
28 March 2021	Thematic Meeting: Flood risk/drainage	General project update and discuss feedback from statutory consultation. Updates on scope of the FRA. The FRA To be run jointly with ECC and SCC Lead Local Flood Authority teams.				
24 March 2022	Thematic Meeting: Cultural Heritage	General project update and discuss feedback from statutory consultation. Updates on Cultural Heritage surveys and assessment. To be run jointly with ECC and SCC cultural heritage teams.				
29 March 2022	Thematic Meeting: Landscape and Visual	General project update and discuss feedback from statutory consultation. Discuss landscape surveys and scope of landscape assessment.				
5 April 2022	Planning/GSP Substation	Third pre-application meeting (virtual) held with BDC and EPS to discuss the intended TCPA Planning Application for the Proposed GSP Substation.				
7 April 2022	Thematic Meeting: Traffic and Transport	General project update and discuss feedback from statutory consultation. Outline scope of traffic surveys. To be run jointly with Essex Highways and Suffolk Highways.				
6 April 2022	Planning/ Scheme Update	General project update. Discuss review of DCO documents.				
27 April 2022	PRoW	Discuss process for managing PRoW during construction. Agree information required at application.				
27 May 2022	Planning/SoCG	Combined meeting to progress the joined-up Host Authority SoCG.				
6 June 2022	Planning/ Scheme Update	General project update. Discuss timeline update, PPA and Engagement Plan.				
15 June 2022	Planning/GSPG SP Substation	Post submission meeting (virtual) held with BDC to discuss the TCPA Planning Application for the proposed GSP substation.				
22 June 2022	Thematic Meeting: Traffic and Transport	Meeting to seek to agree the methodology for the Transport Assessment and the Traffic and Transport Chapter in the Environmental Statement (ES).				
17 August 2022	Thematic Meeting: Cultural Heritage	General project update. Updates on Cultural Heritage assessment. To be run jointly with ECC and SCC cultural heritage teams.				
28 July 2022	Planning	SoCG discussion.				
1 August 2022	Planning	General project update				
6 September 2022	Thematic Meeting: Ecology (general)	General project update Discuss high level results of assessment and proposed mitigation.				
22 September 2022	Thematic Meeting: Cultural Heritage	General project update. Updates on Cultural Heritage assessment. Discuss high level results of assessment and proposed mitigation. To be run jointly with ECC and SCC cultural heritage teams				

Date	Topic	Discussion points	E	S	B	B
			C	C	M	D
			C	C	S	D
			Attendance			
26 September 2022	Planning	General project update. Discuss the on-going targeted consultation.				
5 October 2022	Thematic Meeting: Traffic and Transport (construction traffic)	Proposed construction routes, discussion regarding constraints, principles about road closures and traffic management				
6 October 2022	Planning	SoCG discussion. Discussion to include feedback received from the Host Authority DCO document reviews.				
17 October 2022	Thematic Meeting: Ecology (Hintlesham Wood - bats)	Discussion regarding bats and Hintlesham Wood options.				
22 November 2022	Planning	General project update				
Winter 2022	Draft DCO (dDCO) Documents	The Host Authorities were issued with a number of dDCO documents for their review and comment on prior to the submission of the DCO.				
2 February 2023	Planning	SoCG discussion. Discussion included feedback received from the Host Authority DCO document reviews.				
13 March 2023	Planning	General project update prior to submission of DCO application.				
31 March 2023	Planning	General project update prior to submission of DCO application, focusing on key design decisions.				
DCO SUBMISSION APRIL 2023						

2.3 Consultation engagement

- 2.3.1 A period of non-statutory consultation was held for six weeks, between 25 March 2021 and 6 May 2021. That consultation re-introduced the project, explained how the Applicant had reviewed the previous proposals, and sought the views of the public and stakeholders. On 13 March 2021, the Applicant wrote to the Consultees as they are prescribed consultees in the DCO process, informing them of the start of the non-statutory consultation and inviting their views.
- 2.3.2 Statutory consultation was held for a period of eight weeks between 25 January 2022 and 21 March 2022 and provided the opportunity for the public and stakeholders to see how the project has evolved since the non-statutory consultation, and comment on further detailed engineering design and environmental assessment work. On 19 January 2022, the Applicant wrote to the Consultees as they are a prescribed consultee in the DCO process, informing them of the start of the statutory consultation and inviting their views.
- 2.3.3 Following statutory consultation, the Applicant proposed several further changes to the proposals and ran a targeted consultation between 8 September 2022 and 19 October

2022, with a focus on the western part of the Stour Valley. On 1 September 2022, the Applicant wrote to the Consultees as they are a prescribed consultee in the DCO process, informing them of the start of the targeted consultation and inviting their views.

2.3.4 The Consultees provided responses to all consultations.

2.4 Summary of post-submission discussions

2.4.1 Table 2.2 summarises the consultation and engagement that has taken place between the Parties post submission of the application for development consent.

Table 2.2 – Post-submission discussions

Date	Topic	Discussion points	E C C	S C C	B M S D C	B D C
5 June 2023	Planning	General project update post submission of the DCO application.				
22 June 2023	Planning/SoCG	SoCG discussion. Discussion included feedback received from SCC in respect to their draft relevant representations.				
31 July 2023	Planning	General project update post submission of the DCO application.				
2 August 2023	Highways	Thematic meeting on highways				
6 September 2023	Highways	Thematic meeting on highways				
7 September 2023	Biodiversity	Thematic meeting on BNG..				
18 September 2023	Planning/SoCG	SoCG discussion. Discussion included feedback received from SCC in respect to their draft relevant representations.				
4 October 2023	Highways	Thematic meeting on highways				
18 October 2023	Highways	Thematic meeting on highways				
2 November 2023	Planning	SoCG progress call				
2 November 2023	Highways	Thematic meeting on highways				
13 November 2023	Ecology, Veteran Tree	Discussion to agree a commitment around the Veteran Tree T378				
15 November 2023	Highways	Thematic meeting on highways				

27 November 2023	Planning	Call to discuss the PPA and the proposed construction working hours as set out in the dDCO.				
29 November 2023	Highways	Thematic meeting on highways				
7 December 2023	Planning/ SoCG	Call to discuss the SoCG and matters arising from it.				
12 December 2023	Landscape and Ecological Management Plan (LEMP)	Thematic LEMP progress call.				

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3. Matters Agreed

3.1.1 It should be noted that where a box is greyed out, it is considered that matter is not relevant to the consultee.

Table 3.1 – Matters Agreed

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
3.1 Regulatory and Planning Policy										
3.1.1	NPSs	The Consultee agrees that NPS EN-1 (Overarching Policy Statement for Energy, 2011) and EN-5 (Electricity Networks Infrastructure, 2011), will form the primary policy context against which the project is assessed in the Submitted Planning Statement (document 7.1 (B)) (submitted at Deadline 6).	Agreed July 2021	Agreed July 2021	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C
3.1.2	Local Development Plan	While the assessment of the application for development consent should be made against the NPS, it is agreed that the Development Plans for each Local Authority are important and relevant considerations. Emerging Plans are also detailed where they are likely to be adopted before the submission of the DCO. The Development Plan for each Local Authority comprises:	Essex and Southend-on-Sea Waste Local Plan 2017 The Essex Minerals Local Plan (2014) (Agreed: December 2022).	Suffolk Minerals & Waste Local Plan (SMWLP) Adopted 9 July 2020 (Agreed: July 2021).	Babergh Local Plan Alteration No.2 (adopted June 2006) Mid Suffolk Core Strategy (adopted September 2008) Mid Suffolk Core Strategy Focussed Review (adopted December 2012) Mid Suffolk Local Plan First Alteration (adopted July 2006)	Local Plan, Section 1 (2013-2033) Local Plan, Section 2 (2013-2033) The Essex Minerals Local Plan (2014) Essex and Southend-On-Sea Waste Local Plan (2017) Essex Minerals Local Plan Review (emerging) (Agreed: July 2021).	E C C	S C C	B & M S D C	B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
					Babergh and Mid Suffolk Joint Local Plan Part 1 (adopted November 2023) SMWLP Adopted 9 July 2020 (Agreed: July 2021).					
3.1.3	Other Planning Policy	While the assessment of the application for development consent should be made against the NPS, it is noted that other planning policy is capable of being important and relevant (other than the adopted Development Plans for each Local Authority). Other planning policy capable of being important and relevant include:	The Consultee considers the following plans to be important and relevant material considerations: The Essex Design Guide (2018) Essex Green Infrastructure Strategy 2020 Essex Green Infrastructure Standards, 2021 The Essex County Council Developers' Guide to Infrastructure Contributions Revised 2020 Net Zero: Making Essex Carbon Neutral Essex Climate Action Commission	N/A	N/A	N/A	E C C	S C C	B & M S D C	B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)				
			Essex County Council's Local Transport Plan (2011 – 2025)								
3.1.4	Other Planning Policy not subject to Public Consultation	While the assessment of the application for development consent should be made against the NPSs, it is noted that other documents may be important and relevant but limited weight is attached to them, given they were not the subject of public consultation.	N/A	The Suffolk Climate Emergency Plan	The Consultee considers the following plans to be important and relevant material considerations: Valued Landscape Assessment – Stour Valley Project Area Dedham Vale Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities and Perceived and Anticipated Risks Special Qualities of the Dedham Vale AONB Evaluation of Area Between Bures and Sudbury	Landscape Character Assessment Section 3 Landscape Character of Braintree District September 2006 Braintree Protected Lanes Report July 2013	E C C	S C C	B & M S D C	B D C	
3.1.5	Development allocations – Layham Quarry	The Consultee agrees that allocations IL4 and NHL3 shown on Map B3 of the SMWLP in the location of Layham Quarry are shown in error and do not need to be considered by the Applicant in the application for development	N/A	Agreed July 2021	N/A	N/A	E C C	S C C	B & M S D C	B D C	

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
		consent for the scheme. Only allocation M5 at Layham Quarry needs to be considered.								
3.1.6	Local Strategic Development Allocations	The Consultee is satisfied that the chosen route corridor for the project does not impact adversely on any strategic allocation identified in emerging or adopted Minerals and Waste Local Plans.	Agreed July 2021	Agreed November 2023.	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C
3.1.7	Draft SoCG	The Consultee agreed to meet with the Applicant on a quarterly basis to progress the draft SoCG.	Agreed October 2021	Agreed October 2021	Agreed October 2021	Agreed October 2021	E C C	S C C	B & M S D C	B D C
3.1.8	Draft SoCG	Individual SoCG meetings were held week commencing 13 December 2021 with the individual Host Authorities. General feedback received during the sessions included the suggestion from SCC that the Host Authorities sign a single joined-up SoCG. Subsequently, all Host Authorities agreed at the meeting held on 6 April 2022 to merge the SoCG, although ensure the SoCG has space to record if there is any divergence between the parties on any topic.	Agreed at Host Authority Update Meeting 6 April 2022	Agreed at Host Authority Update Meeting 6 April 2022	Agreed at Host Authority Update Meeting 6 April 2022	Agreed at Host Authority Update Meeting 6 April 2022	E C C	S C C	B & M S D C	B D C
3.1.9	SoCC	The Consultee agrees with the proposed approach to Statutory Consultation as set out in the SoCC and agrees that the statutory consultation was carried out in accordance with the SoCC.	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C
3.1.10	Targeted Consultation	The Consultee agrees with the method and approach set out in respect to the Targeted	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M	B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)				
		Consultation and was communicated with as to the extension to the consultation to take account of the National mourning period. Subsequently, the Consultee has no objection to the consultation events continuing.							S D C		
3.1.11	dDCO	The Consultee has been supplied with a draft version of the DCO (including Explanatory Memorandum and draft Requirements) in August 2022 and has been given the opportunity to provide comments on the draft document ahead of the submission of the application for development consent.	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C	
3.1.12	Response to Targeted Consultation	The Consultee gave their full opinion and comments regarding the project in their Targeted Consultation feedback.	Agreed	The Consultee (SCC Highways) consider it useful to record the duration of meetings and list the information that was provided prior to or after the meetings. SCC consider that only limited information was provided prior to meetings and therefore responses were also limited and not full as stated at 3.1.16	Agreed	Agreed	E C C	S C C	B & M S D C	B D C	

3.2 Need and Alternatives

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
3.2.1	Need for the Project	The Consultee agrees with the need case for the project as set out in the submitted document Need Case April 2023 [APP-161].	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C
3.2.2	Strategic Options	The Consultee agrees with the process, methodology and outcome of the strategic options appraisal presented in the Bramford to Twinstead Project Development Options Report (March 2021).	Agreed July 2021	Agreed July 2021	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C
3.2.3	Route Corridor	The Consultee agrees that the chosen Corridor 2 as detailed in the Bramford to Twinstead Project Development Options Report (March 2021) is a suitable route corridor. The corridor was namely selected as it generally follows the existing 132kV overhead line.	Agreed July 2021	Agreed July 2021	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C
3.2.4	GSP off the A131	The Consultee agrees with the proposed location for the GSP substation off the A131 in the county of Essex and planning permission has been granted pursuant to the TCPA for the GSP substation.	Agreed July 2021	Agreed July 2021	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C
3.2.5	Climate Change Emergency	The Consultee declared a Climate Change Emergency in July 2019. The draft Braintree District Council Climate Change Strategy 2021 – 2030 acknowledges that as much energy as possible needs to be derived from renewable sources (page11). The Consultee agrees that the project will contribute to the objectives of this strategy and towards addressing the Climate	N/A	N/A	N/A	Agreed July 2021	E C C	S C C	B & M S D C	B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)				
		Change Emergency declared by the Consultee, by facilitating the transmission of electricity from renewable sources.									
3.2.6	Climate Change Emergency	The Consultees declared a Climate Change Emergency in March 2019 as members of the Suffolk Climate Change Partnership. In this respect, the Consultees' agree that the scheme will contribute towards addressing the Climate Change Emergency declared by the Consultees, by facilitating the transmission of electricity from renewable sources.	N/A	Agreed July 2021	Agreed July 2021	N/A	E C C	S C C	B & M S D C	B D C	
3.2.7	Design	Section E: Dedham Vale AONB: Consultee supports the undergrounding proposed in the AONB and do not contest the judgements made on visual effects from CSE compounds based upon the information provided in the ES Chapter 6: Landscape and Visual [APP-074].	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	E C C	S C C	B & M S D C	B D C	
3.2.8	Design	Section G: Stour Valley: Consultee supports the undergrounding proposed in the Stour Valley and do not contest the judgements made on visual effects from CSE compounds, based upon the information provided in the ES Chapter 6: Landscape and Visual [APP-074].	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	E C C	S C C	B & M S D C	B D C	
3.2.9	Design – Hintlesham Woods	The Consultee agrees with the Applicant's decision to progress with Option 2 to avoid unacceptable impacts upon the	N/A	Agreed in their Relevant Representation Response	Agreed in their Relevant Representation Response	N/A	E C C	S C C	B & M S D C	B D C	

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
		Hintlesham Woods Site of Special Scientific Interest (SSSI).BMSDC		(Published 24 July 2023)	(Published 24 July 2023)					
3.2.10	Design	The Consultee does not object to the locations of the four CSE compounds in principle.	Agreed, subject to the provision of a suitable landscape planting scheme.	Agreed, subject to the provision of a suitable landscape planting scheme.	Agreed, subject to the provision of a suitable landscape planting scheme.	Agreed, subject to the provision of a suitable landscape planting scheme.	E C C	S C C	B & M S D C	B D C
3.3 Approach and Method										
3.3.1	EIA Approach and Method	The Consultee agrees with the general EIA approach and method set out in Section 5 of the EIA Scoping Report.	Agreed July 2021	Agreed July 2021	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C
3.3.2	EIA Approach and Method	The Consultee agrees with 3.3.1 above; however, comments that their preference would have been for the Applicant to have used the Guidelines for the Environmental Assessment of Road Traffic assessment methodology instead of Design Manual for Roads and Bridges LA 112.	N/A	Agreed.	N/A	N/A	E C C	S C C	B & M S D C	B D C
3.3.3	EIA Approach and Method	The Consultee agrees with 3.3.1 above; however, in respect to socioeconomics the parties note that it was scoped out in respect to the Screening Opinion adopted by the Planning Inspectorate, but disagree with this decision.	Agreed.	Agreed.	Agreed.	Agreed.	E C C	S C C	B & M S D C	B D C
3.4 Landscape and Visual										
3.4.1	Assessment Methodology	The Consultee agrees with the methodology for the landscape and visual assessment as set out in the EIA Scoping Report and PEIR, including the approach used in preparing the Zone of	Agreed July 2021	Agreed July 2021	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
		Theoretical Visibility. This includes the inclusion of the Technical Guidance Note 02-21: Assessing landscape value outside national designations (May 2021) as set out in the PEIR, and subsequently on the Applicant's submitted documents ES chapter 6: Landscape and Visual [APP-074].								
3.4.2	Viewpoint locations	The Consultee attended meetings with the Applicant to discuss viewpoint locations and through that process, agrees with the viewpoint locations that will inform the Landscape and Visual Chapter of the ES.	Agreed July 2021	Agreed July 2021	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C
3.4.3	Photomontages	The Consultee attended meetings with the Applicant to discuss photomontage locations and through that process, agrees with the photomontage locations that will inform the Landscape and Visual Chapter of the ES.	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C
3.4.4	ES Chapter 6: Landscape and Visual	The Consultee has considered the submission version of ES Chapter 6: Landscape and Visual and agree with the assessment conclusions.	TBC	TBC	TBC	TBC	E C C	S C C	B & M S D C	B D C
3.5 Biodiversity										
3.5.1	Assessment Methodology	The Consultee agrees with the methodology and survey scope for the biodiversity assessment, specifically in relation to the consideration of impacts on County level sites. The approach to the biodiversity surveys will be agreed with Natural England and	Agreed July 2021 and subsequently reaffirmed in their response to Statutory Consultation.	Agreed July 2021 and subsequently reaffirmed in their response to Statutory Consultation.	Agreed July 2021 and subsequently reaffirmed in their response to Statutory Consultation.	Agreed July 2021 and subsequently reaffirmed in their response to Statutory Consultation.	E C C	S C C	B & M S D C	B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
		provided to the Consultee for information.								
3.5.2	Great Crested Newt (GCN)	The Consultee agrees with the confirmation that the Applicant has agreed with Natural England to apply for District Level Licensing for GCN instead of surveys.	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	E C C	S C C	B & M S D C	B D C
3.5.3	Dormouse Methodology	The Consultee agrees with the inclusion of the Host Authorities and the Essex & Suffolk Dormouse Group in consultation on survey scope in respect to dormouse.	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	Agreed in their written response to the Statutory Consultation	E C C	S C C	B & M S D C	B D C
3.5.4	Hintlesham Woods Survey Scope	The Consultee agrees with the methodology and survey scope in respect to the Hintlesham Woods options (option 1 and option 2).	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C
3.5.5	Species survey results	National Grid agrees that Suffolk Biological Information Service and Essex Field Club (as appropriate) will be provided with all species survey results at an appropriate time post submission of the application for development consent.	TBC	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C
3.5.6	ES Chapter 7: Biodiversity	The Consultee has considered the submission version of ES Chapter 7: Biodiversity and agree with the assessment conclusions, with proviso that mechanisms need be secured in management plans. Matters still under discussion on management plans are covered below.	TBC	TBC	Under discussion due to concerns over the LEMP and BNG as described in the 'Matters Under Discussion' section.	TBC	E C C	S C C	B & M S D C	B D C
3.5.7	Veteran Tree (T378)	The Applicant has drafted a new commitment, EM-G13 in the Register of Environmental Actions	N/A	N/A	Agreed	N/A	E C C	S C C	B & M	B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)				
		and Commitments (REAC) (document 7.5.2 (D)), in relation to veteran tree T378. This was submitted to BMSDC for comment, agreed and will be included in the updated version of the REAC submitted at Deadline 6. The REAC, is secured via Requirement 4 of the dDCO.								S D C	
3.5.8	BNG	The BNG calculation uses the Defra 3.1 metric which is considered a suitable tool for calculating habitat loss, mitigation and a 10% BNG on the project. This approach has been agreed with Natural England as set out in Draft Statement of Common Ground Natural England (document 7.3.2 (D)).	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C	
3.5.9	BNG	ECC/BDC note that the Applicant considers that land within the Order limits is capable of delivering at least 10% BNG. No offsite BNG is proposed. If offsite BNG is proposed, then a Section 106 Agreement would be required to tie this in but this does not apply at present.	Agreed	N/A	N/A	Agreed	E C C	S C C	B & M S D C	B D C	
3.6 Historic Environment											
3.6.1	Assessment Methodology	The Consultee agrees with the methodology for the historic environment chapter as set out in the EIA Scoping Report and the PEIR.	Agreed 3 September 2021 and agreed in their written response to the Statutory Consultation.	Agreed September 2021 and agreed in their written response to the Statutory Consultation.	Agreed September 2021 and agreed in their written response to the Statutory Consultation.	Agreed September 2021 and agreed in their written response to the Statutory Consultation.	E C C	S C C	B & M S D C	B D C	
3.6.2	Impacts to Built Heritage	The Consultee agrees that no physical impact (i.e. impact to historic fabric, not setting) is	Agreed in their written response to the Statutory	Agreed.	Agreed in their written response to the Statutory	Agreed in their written response to the Statutory	E C C	S C C	B & M	B D C	

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
		anticipated to identified built heritage assets, with no works occurring to their fabric.	Consultation via the comments of EPS.		Consultation via the comments of EPS.	Consultation via the comments of EPS.			S D C	
3.6.3	ES Chapter 8: Historic Environment	<i>The Consultee has considered the submission version of ES Chapter 8: Historic Environment and agree with the assessment conclusions.</i>	TBC	Agreed.	TBC	TBC	E C C	S C C	B & M S D C	B D C
3.7 Water Environment										
3.7.1	Assessment Methodology	The Consultee agrees with the methodology for the water assessment as set out in the EIA Scoping report and subsequently updated in the PEIR.	Agreed July 2021	Agreed July 2021	N/A	N/A	E C C	S C C	B & M S D C	B D C
3.7.2	FRA	Consultees agree with the content of the FRA as highlighted in the Consultee's review of the FRA.	Agreed October 2022	Agreed October 2022	N/A	N/A	E C C	S C C	B & M S D C	B D C
3.7.3	ES Chapter 9: Water Environment	The Consultee has considered the submission version of ES Chapter 9: Water Environment and agree with the assessment conclusions.	Agreed	TBC	Agreed	TBC	E C C	S C C	B & M S D C	B D C
3.8 Traffic and Transport										
3.8.1	Assessment Methodology	The Consultees agree with the methodology for the baseline traffic survey counts being done in May as set out in the email sent.	Agreed July 2021	Agreed July 2021	N/A	N/A	E C C	S C C	B & M S D C	B D C
3.8.3	Permit Schemes	The Consultee has provided the Applicant with their Permitting Schemes for consideration in inclusion in the dDCO.	Agreed	Agreed	N/A	N/A	E C C	S C C	B M S D C	B D C
3.9 Air Quality										

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
3.9.1	Assessment Methodology	The Consultee agrees with the methodology for the air quality environment assessment as set out in the EIA Scoping report and subsequently updated in the PEIR.	N/A	N/A	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C
3.9.2	Sudbury Air Quality Management Area (AQMA)	The Consultee (SCC & BMSDC) supports proposals to avoid construction traffic routeing via Sudbury AQMA.	N/A	Agreed in their Relevant Representation Response (Published 24 July 2023)	Agreed in their Relevant Representation Response (Published 24 July 2023)	N/A	E C C	S C C	B & M S D C	B D C
3.9.3	ES Chapter 13: Air Quality	The Consultee has considered the submission version of ES Chapter 12: Air Quality and agree with the assessment conclusions.	Agreed	Agreed	Agreed	TBC	E C C	S C C	B & M S D C	B D C
3.10 Noise and Vibration										
3.10.1	Assessment Methodology	The Consultee agrees with the methodology for the noise and vibration assessment as set out in the EIA Scoping report and subsequently updated in the PEIR.	N/A	N/A	Agreed July 2021	Agreed July 2021	E C C	S C C	B & M S D C	B D C
3.10.2	ES Chapter 14: Noise and Vibration	The Consultee has considered the submission version of ES Chapter 14: Noise and Vibration and agree with the assessment conclusions.	TBC	TBC	TBC	TBC	E C C	S C C	B & M S D C	B D C
3.11 Geology and Hydrogeology										
3.11.1	Hydrogeological Risk Assessment and Private Water Supplies	Risks to private water supplies will be managed by the post-consent hydrogeological risk assessments, which will be subject to approval by the Environment Agency. For further details, please refer to the Draft Statement of Common Ground Environment Agency	Agreed	TBC	TBC	Agreed	E C C	S C C	B & M S D C	B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
		(document 7.3.3 (D)), submitted at Deadline 6).								
3.11.2	Mineral Safeguarding	The as submitted Minerals Resource Assessment [APP-132] is considered acceptable and available mineral resources will not be unduly prejudiced	Agreed in their Relevant Representation Response (Published 24 July 2023)	Agreed in their Relevant Representation Response (Published 24 July 2023)	Agreed in their Relevant Representation Response (Published 24 July 2023)	Agreed in their Relevant Representation Response (Published 24 July 2023)	E C C	S C C	B & M S D C	B D C
3.11.3	ES Chapter 10: Geology and Hydrogeology	The Consultee has considered the submission version of ES Chapter 10: Geology and Hydrogeology and agree with the assessment conclusions.	Agreed	Agreed	Agreed	TBC	E C C	S C C	B & M S D C	B D C
3.12 Cumulative Effects										
3.12.1	Long and Short List	The Consultee has no further comments to make on the Long List of Other Developments [APP-142] and those developments taken forward for further consideration in Table 1.1 of ES Appendix 15.4: Shortlist of Other Developments [APP-143].	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C
3.12.2	ES Chapter 15: Cumulative Effects	The Consultee has considered the submission version of ES Chapter 15: Cumulative Effects and agree with the assessment conclusions, except on mitigation for cumulative effects with Norwich to Tilbury. The point not agreed is explored in 4.1.1 'Matters Not Agreed' section below.	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C
3.13 Environmental Management and Mitigation										
3.13.1	Electric Magnetic Fields (EMF) Report	Consultee agrees with the conclusions of the final submitted EMF report [APP-056].	N/A	No comments to make as confirmed in December 2022.	No comments to make as confirmed in December 2022.	Unable to verify conclusions owing to no in-house expertise on EMF	E C C	S C C	B & M	B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)			
						matters (confirmed January 2023).			S D C	
3.13.2	Draft Material and Waste Management Plan (MWMP)	The Consultees were supplied with a draft version of the MWMP in November 2022 and were given the opportunity to provide comments on the draft document ahead of submission of the application for development consent.	Agreed	Agreed	N/A	N/A	E C C	S C C	B M S D C	B D C
3.13.3	Draft Construction Environmental Management Plan (CEMP) inc. Draft Code of Construction Practice (CoCP)	The Consultees were supplied with a draft version of the CEMP inc. CoCP on 25 November 2022 and were given the opportunity to provide comments on the draft document ahead of the submission of the application for development consent.	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B M S D C	B D C
3.13.4	Draft Landscape and Ecological Management Plan (LEMP)	The Consultees were supplied with a draft version of the LEMP on 1 December 2022 and were given the opportunity to provide comments on the draft document ahead of the submission of the application for development consent.	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B M S D C	B D C
3.13.5	Draft Construction Traffic Management Plan (CTMP)	The Consultees were supplied with a draft version of the CTMP on 29 November 2022 and were given the opportunity to provide comments on the draft document ahead of the submission of the application for development consent.	Agreed	Agreed			E C C	S C C	B M S D C	B D C
3.14 Discharge of Requirements										
3.14.1	Authority Responsible for	In respect to the Discharge of Requirements, it was agreed by	Agreed at Host Authority Update	Agreed at Host Authority Update	Agreed at Host Authority Update	Agreed at Host Authority Update	E C	S C	B &	B D

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)
	Discharging Requirements	the Consultees that County matters would be discharged by the Counties and District matters would be discharged by the Districts. Broadly speaking, County Councils would cover minerals and waste, highways, PRoW, drainage and archaeology. Where there are cross-boundary Discharge of Requirements, the relevant Districts/Counties would be consulted and both responsible for the discharging of the requirement in their jurisdiction (partial discharge). It was also agreed that the Districts would remain the responsible enforcing authority.	Meeting 6 April 2022	Meeting 6 April 2022	Meeting 6 April 2022	Meeting 6 April 2022	C C M C S D C
3.15 Socioeconomics							
3.15.1	Socio Economics and Tourism Report	The Consultee agrees that the methodology used in the analysis of socioeconomic impacts in Section 3 of the Socio Economics and Tourism Report [APP-066] is appropriate and that the analysis has been carried out correctly in the context of this methodology.	Agreed	N/A	N/A	Agreed	E C C S C C B & M S D C B D C
3.16 dDCO							
3.16.1	dDCO	The Consultee was provided with a copy of the draft dDCO on 5 August 2022 and has been given the opportunity to comment.	Agreed	Agreed	Agreed	Agreed	E C C S C C B & M S D C B D C
3.17 Agriculture and Soils							
3.17.1	Best Most Versatile (BMV)	SCC Comment that 'Best and Most Versatile Agricultural (BMV) Land; the Council acknowledges the	Agreed	Agreed	Agreed	Agreed	E C C S C C B & M B D C

ID	Matter	Agreed position	Essex County Council	Suffolk County Council	Babergh and Mid Suffolk District Councils	Braintree District Council	All Parties Agreed (Red Amber Green (RAG) Rating)				
	Agricultural Land	<i>limited negative upon BMV land so long as appropriate soil handling techniques are guaranteed.'</i>							S	D	C
3.17.2	ES Chapter 11: Agriculture and Soils	The Consultee has considered the submission version of ES Chapter 11: Agriculture and Soils and agree with the assessment conclusions. Appropriate measures have been set out within the CEMP, REAC and CoCP in respect to this topic.	Agreed	Agreed	Agreed	TBC	E	S	B	B	
							C	C	&	D	
							C	C	M	C	
									S		
									D		
									C		

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4. Matters Not Agreed

Table 4.1 – Matters not Agreed

SoCG ID	Matter	The Consultee Position	The Applicant Position
4.1 Landscape and Visual			
4.1.1	Cumulative Landscape Effects around Bramford	<p>SCC (Landscape) considers that the cumulative landscape and visual effects around Bramford Substation require a more holistic approach, such as a landscape and ecology masterplan, which factors in the additional energy infrastructure developments expected in this area. The potential for comprehensive off-site mitigation needs to be further explored around Bramford and Burstall. SCC acknowledges that the inter-project cumulative effects will not be capable of being fully mitigated and, therefore, considers that compensation and landscape scale restoration are required. This comment is particularly made in relation to cumulative effects between to Twinstead Norwich to Tilbury, although there are numerous other projects also</p>	<p>The Applicant disagrees that further off-site mitigation is required to make the project acceptable and responded to this in line item 6.127 to 6.129 and also 6.12 to 6.16 in the Applicant's Comments on Suffolk County and Babergh Mid Suffolk District Council's Local Impact Reports [REP3-049].</p> <p>Environmental effects have been avoided, and reduced and mitigated throughout the development of the project. The Applicant maintains that in the context of a major infrastructure project, the residual adverse effects are considered to be very limited and are outweighed, and should be considered in the context of the significant benefits of the project. These remaining residual effects are considered to be acceptable without further action on mitigation or compensation.</p> <p>The Bramford to Twinstead Reinforcement is more advanced than larger projects such as Norwich to Tilbury. The Norwich to Tilbury project initial alignment and design is still evolving, with statutory consultation not planned until 2024. Once the design is finalised, measures would likely be incorporated to reduce effects when the design is finalised. Therefore, effects predicted now may or may not occur as the design evolves and measures to avoid, reduce and mitigate impacts are introduced to the Norwich to Tilbury project. No application has yet been submitted or consented. In the context of this significant uncertainty, it would not be possible or reasonable for the Bramford to Twinstead project to design a masterplan to mitigate or compensate for the effects of the Norwich to Tilbury project, or other projects at such an early stage of design.</p>
4.2 Redundant 132kV Overhead Line			

SoCG ID	Matter	The Consultee Position	The Applicant Position
4.2.2	Removal of Overhead Line	ECC & BDC remain of the view that there would be a significant landscape benefit of the removal of the additional section of the 132kV overhead line, which UK Power Networks (UKPN) essentially confirm in their letter to Braintree (Appendix 1 of the Local Impact Report) would be redundant following completion of the project. ECC & BDC consider this removal should be part of the project.	The Applicant agrees that there would be landscape benefits to the removal of the remaining section of overhead line. However, as noted in the Applicant's Written Summary of Oral Submissions Made to Issue Specific Hearing (ISH4) [REP4-034], the overhead line is owned by 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 and the Applicant does not have the power to remove the line.
4.3 Environmental Management and Mitigation			
4.3.3	The Mitigation Hierarchy	<p>SCC and BMSDC considers in respect to the mitigation hierarchy as per the November 2023 draft replacement NPS EN-1, requires the Applicant to apply measures of compensation, where avoidance, reduction and mitigation are not capable of sufficiently mitigating adverse effects resulting from the scheme.</p> <p>SCC considers that the Applicant is not doing enough to bring forward compensatory landscape measures and that more needs to be done and that it is not adequate to say there are residual; impacts that the applicant is not able to mitigate and that they should be weighed against the benefits of the scheme.</p>	<p>The Applicant agrees that the mitigation hierarchy in the November 2023 NPS EN-1 includes compensation and that compensation measures considered by the Applicant must be described in the ES. However, the Applicant disagrees with the interpretation that NPS EN-1 requires Applicants to compensate for all residual adverse effects. Paragraph 4.2.11 of EN-1 (November 2023) makes a clear distinction between the other three elements of the hierarchy and 'compensation' by stating that '<i>Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated</i>'. This sentence references three of the four elements of the hierarchy to make it clear that it does not apply to compensation. More detail on the Applicant's position on this point was provided in response to SCC's point in Applicant Comments on Other Submissions Received at Deadline 4 [REP5-033].</p> <p>The Applicant is of the opinion that they have applied for development consent with a well mitigated project. The Applicant has set out its approach to landscape mitigation in ES Chapter 6: Landscape and Visual [APP-074] and its landscape strategy is set out in the LEMP [REP3-034]. It is the Applicant's view that the project is well mitigated and no further compensation is required.</p>
4.3.4	<p>LEMP and Appendices:</p> <ul style="list-style-type: none"> A. The Vegetation Retention and Removal Plan B. The Vegetation Reinstatement Plan C. Planting Schedules 	<p>SCC/BMSDC considers that there are issues with the LEMP, as it is currently presented, which are not acceptable for a final LEMP, in some cases, not even for an Outline LEMP.</p> <p>Elements that are considered unacceptable include the planting schedules (species selection and percentages in the mix, sizes of tree stock, uniformity across the scheme), provisions for aftercare, such as</p>	<p>The Applicant does not consider a need to change the document to an Outline LEMP as it considers all relevant aspects are included within the current LEMP. The Applicant is reviewing the feedback from the Host Authorities, including the LEMP Document Review [REP5-035] and will respond to the points raised at Deadline 7.</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
		<p>timing to hand responsibility back to landowners, aftercare period for trees, aftercare prescriptions and periods for natural regeneration of woodland (further details to be provided at Deadline 5).</p> <p>SCC (Landscape) considers it would be preferable to agree a revised Outline LEMP, with detailed LEMPs being provided with the planting proposals for each section at post consent stage.</p> <p>SCC considers that the proposals for landscape and visual mitigation and compensation planting generally is insufficient and insufficiently secure (reliant on third party agreements).</p> <p>SCC also note that the Thematic Meeting on 12 December 2023 was useful and in some areas progress may have been made (for example, species selection and stock sizes); however, it appears that no agreement is likely to be achieved on a number of other items (for example, that at consent stage the control document should be considered to be an outline document, and matters concerning protective fencing).</p>	
4.4 Traffic and Transport			
4.4.1	Securing traffic numbers per access for the construction period	<p>ECC and SCC are of the view that the assumptions on traffic numbers assessed in the Transport Assessment should be secured in the CTMP so that certainty is provided that impacts would not exceed that assessed. ECC and SCC also maintain that these traffic numbers should be monitored, with requirements for action if they are exceeded.</p>	<p>The Applicant disagrees that this is necessary or proportional given that the impact on the highway network is not substantial; construction traffic is spread out over a long linear project and traffic is mostly temporary, limited to after the construction period. Whilst traffic numbers assessed in the ES are considered to be a reasonable worst case and highly unlikely to be exceeded, this cannot be guaranteed in a large-scale construction project, where unexpected events can occur. Similarly, whilst traffic numbers can be predicted at a high level, it is not possible to predict traffic numbers with accuracy on a day-to-day basis by access point, which is what ECC/SCC have suggested is secured. Nor even during construction, nor is it necessary to secure such fine detail of construction to avoid significant do so to assess effects. The Applicant therefore disagrees that there is a need to secure traffic numbers in the CTMP.</p> <p>The Applicant is also of the view that tight restrictions on traffic by access is likely to lead to unintended consequences, which themselves could have adverse environmental impacts. This could include vehicles parking</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
			<p>up until the following day because daily traffic has been met, driving further to a different access because enough traffic has used a particular access or construction periods in a particular location being lengthened due to restrictions on vehicle numbers.</p> <p>Notwithstanding the general position above, the Applicant remains in discussion with ECC and SCC about whether there are any particular roads where more specific limitations are placed on routes that use routes that are unsuitable for high levels of traffic routing to ensure the traffic levels are not unacceptably high on those routes.</p>

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5. Matters Under Discussion

Table 5.1 – Matters under Discussion

SoCG ID	Matter	The Consultee Position	The Applicant Position
5.1	Historic Environment		
5.1.1	Archaeology, Trial Trenching and the Outline Written Scheme of Investigation (OWSI)	<p>SCC considers that any decisions on the appropriate level of archaeological mitigation will need to be agreed by the relevant local authority archaeological advisors. To date, SCC has not approved the OWSI.</p> <p>ECC and BDC consider that there are a number of issues with the current OWSI which will need to be addressed to make it acceptable.</p>	<p>The Applicant has reviewed the comments from the Host Authorities when updating the OWSI for application and incorporated changes where appropriate [AS-001].</p> <p>The Host Authorities have submitted additional comments to the Applicant on the OWSI on 18 December 2023. The Applicant will review these comments and seek to provide a response at Deadline 7 whether changes are required.</p>
5.1.2	Cultural Heritage Assets Associated with Famous Artists and Writers	<p>SCC remains unclear whether the cultural associations between famous artists and writers and cultural heritage assets, including Benton End House, had been included in the Applicant's assessment of the significance of those assets, including the contributions that their settings made to that significance.</p>	<p>The Applicant submitted a Technical Note on Cultural Associations at Deadline 5. The Technical Note on Cultural Associations [REP5-028] notes that neither of the effects on Benton End House or Overbury Hall are considered to be so serious that it would lead to an inability to appreciate or understand them or their relationships to their settings or their historic associations with historic artists or works of art. Neither of the effects on these heritage assets are considered to result in substantial harm. The project effects fall below the levels of a serious impact on the significance of these heritage assets and would not seriously affect any key elements of their special architectural or historic interest.</p>
5.2 The dDCO			
5.2.1	The dDCO, Key Issues	<p>With reference to the Schedule of Changes [REP5-020] (for the purposes of Deadline 5) the Applicant has made a number of changes (at Deadlines 2, 3 and 4) in response to matters raised by the Councils through the Joint Local Impact Reports, responses to First Written</p>	<p>The extent of “pre-commencement operations” set out in Article 2(1)</p> <p>The Applicant remains of the view that the ‘pre-commencement operations’ have limited potential to give rise to significant adverse impacts, and those works are already assessed as part of the ES.</p>

		<p>Questions and as part of Issue Specific Hearing (ISH2) oral submissions.</p> <p>There are a number of matters under discussion in respect to the dDCO, which at a high-level include:</p> <ul style="list-style-type: none"> - The extent of “<i>pre-commencement operations</i>” set out in Article 2(1); The 28-day deemed consent period which is used in various Articles and also in Schedule 4 – where the Councils comment that 56 days would be more appropriate. - The exercise of street works powers, particularly in terms of the role of the Permit Schemes as well as the implementation of temporary stopping-up/diversions and Traffic Regulation Orders; - The geographic extent of powers exercisable pursuant to Article 48 (felling and lopping); - The need for, and practical operation of, a safeguarding provision as set out in Article 53; - The level of detail included in the Management Plans and their approval mechanism (Requirement 4); - The extent of construction working hours (Requirement 7); - The duration of the ‘aftercare period’ for reinstatement planting (Requirement 10) – i.e. whether it is 5 years or 10/15 years; - The scope of Requirement 11 (Highway works), particularly in the context of undertaking “<i>pre-commencement operations</i>”; and - The request for the inclusions of additional Requirements. 	<p>The 28-day deemed consent period which is used in various Articles and also in Schedule 4 – where the Councils say that 56 days would be more appropriate</p> <p>The Applicant does not consider that the suggested alternative of 56 days is conducive to the timely delivery of a project for which there is a critical national need (to which see the Need Case [APP-161]) and the Applicant notes that there is extensive precedent for a 28-day period in a number of existing DCOs. Further details are provided into its response reference 17.16 to 17.19 in the Applicant’s Comments on Suffolk County and Babergh Mid Suffolk District Council’s Local Impact Report [REP3-049].</p> <p>The exercise of street works powers, particularly in terms of the role of the Permit Schemes as well as the implementation of temporary stopping-up/diversions and Traffic Regulation Orders</p> <p>The Applicant disagrees with that the inclusion of deeming provisions in the dDCO negates the need for the dDCO to also state that approvals must not be unreasonably withheld or delayed.</p> <p>The geographic extent of powers exercisable pursuant to Article 48 (felling and lopping)</p> <p>ECC/BDC suggest the addition of ‘to enable minimum standard electrical safety clearances to be maintained’ to Art 48 to clarify scope of the article. The Applicant respectfully disagrees with the Councils’ submission.</p> <p>The exercise of powers pursuant to Article 48(1) is already constrained, such that activities of felling or lopping etc. may only be carried out for the specific statutory purpose(s) set out in sub-paragraphs (a) and (b), namely to prevent an obstruction or interference with the construction, maintenance or operation of the authorised development or any apparatus used in connection with it, or to remove or prevent a danger to persons constructing, operating or maintaining the same.</p> <p>The inclusion of additional drafting as suggested by the Councils would therefore impose an unnecessary further constraint on the exercise of those powers, and indeed could give rise to unacceptable health and safety risks for those engaged in construction, maintenance or operational activities in relation to the project.</p>
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			<p>The need for, and practical operation of, a safeguarding provision as set out in Article 53</p> <p>The Applicant notes that there is no other established statutory mechanism which would represent a sufficient safeguard to the integrity of the project during both its construction and operational phases. The risk of the project being affected by other, as yet unknown, third-party developments is arguably more acute given the long linear nature of the project and its geographical location in an area where multiple other developments are anticipated. Article 53 is intended to overcome this risk to the proper delivery and functioning of a critical national infrastructure project. In that context, the Applicant is of the view that the obligations placed on the Councils in this article are not onerous, and fulfil a valid planning function.</p>
			<p>The level of detail included in the Management Plans (Requirement 4)</p> <p>See further details below at Section 5.11.</p>
			<p>The extent of construction working hours (Requirement 7)</p> <p>See further details below at Section 5.9.</p>
			<p>The duration of the ‘aftercare period’ for reinstatement planting (Requirement 10) – i.e. whether it is 5 years or 10/15 years</p> <p>The Applicant notes that LEMP Appendix B: Reinstatement Plan was submitted as part of the application in April 2023 but was updated at Deadline 3 [REP-036] based on feedback from third parties.</p> <p>The Applicant considers that it has the right balance; of five years across most of the project, which consists mainly or reinstatement of hedgerows. The Applicant is proposing to maintain embedded planting for the life of the assets and has also proposed 30 years in relation to MM09 to the north of Hintlesham Woods SSSI.</p> <p>The Applicant notes that the CEMP, CoCP and REAC [REP3-024, REP3-026 and REP3-028 respectively] were updated at Deadline 3 to include new commitments such as the wording of GH07 agreed with the Environment Agency. The REAC was then further updated at Deadline 4 (document 7.5.2 (D)) to present a complete list of commitments made on the project.</p>

			<p>The scope of Requirement 11 (Highway works), particularly in the context of undertaking ‘pre-commencement operations’</p> <p>The Applicant agrees that it is appropriate for SCC and, indeed, ECC (each in its capacity as local highways authority) to have a sufficient degree of control and oversight in respect of the design, layout and, where appropriate, reinstatement of any accesses which are to be formed and/or permanently or temporarily altered as part of the authorised development, including those which may be formed or altered as part of any pre-commencement operations. Draft DCO Requirement 11 was updated at Deadline 5 to make it clear that, 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.</p> <p>The request for the inclusions of additional Requirements</p> <p>The suggestions cover the control of artificial light, HGV traffic, complaint handling, the external appearance of structures and providing further evidence on the Management Plans. The Applicant has set out its current position on all these matters under ‘Item 5’ in Applicant’s Comments on Other Submissions Received at Deadline 4 [REP5-025].</p>
5.3	Noise and Vibration		
5.3.1	Noise Monitoring	BMSDC expect to be consulted on and have sight of the results of noise monitoring undertaken across sites together with any additional mitigation to ensure that the levels accord with those outlined at the nearest Noise Sensitive Receptor (NSR).	Noise monitoring is not anticipated to be required for most works on a project of this nature. However, monitoring may be required as part of the Section 61 process, in which case the details would be agreed with the relevant planning authority through the Section 61 applications and then monitored by the Main Works Contractor.
5.4 Community Benefits			
5.4.1	Memorandum of Understanding (MoU) of	All Host Authorities expect the Applicant to coordinate their projects in Suffolk and actively engage with the Council via a MoU, with regard to East Anglia Green, Sealink and Bramford to Twinstead, to secure benefits for and investment in local businesses and employment networks.	It has been determined that there are no likely significant effects on socio-economics associated with the Bramford to Twinstead Reinforcement, however the Applicant is committed to continuing discussions with the Host Authorities and other key stakeholders regarding their aspirations in respect of community benefits. These

5.4.2	Community Benefits Package	All Host Authorities expect the Applicant to voluntarily commit to a community benefits package, and to work in partnership to plan and deliver this package to maximise benefits for local communities	discussions would be outside of the DCO process whilst we await the outcome of the Government's consultation on community benefits.
5.5 Hintlesham Hall			
5.5.1	Setting of Listed Buildings in the Vicinity of and Including Hintlesham Hall	SCC & BMSDC comment that whilst the proposed revision to the REAC to EM-AB01 is a helpful clarification, which provides some reassurance, SCC's (Landscape) clear preference would be for consultation with the relevant parties on the finalisation of pylon locations in the vicinity of Hintlesham Hall to ensure that adverse impacts are minimised.	<p>ES Appendix 8.2: Annex A Hintlesham Hall Assessment [APP-128] presents the assessment of effects on Hintlesham Hall and its ancillary buildings. This concludes that there would be a minor adverse effect, which is not significant. Annex A also notes that although there would be harm to the setting of Hintlesham Hall and its ancillary buildings, this would not be substantial. Additionally, the Applicant has included a commitment in the REAC [REP4document 7.5.2 (D)] which states <i>'The Proposed Alignment to the north of Hintlesham Hall is based on the pylon locations from the optimised alignment discussed with English Heritage (now Historic England) in 2013. National Grid will continue to work with Historic England as the designs develop to identify the most suitable location for the pylons in relation to the setting of Hintlesham Hall, taking into account the limits of deviation and technical considerations such as distance between conductor spans. In utilising the LoD, National Grid will not position a pylon between the access track to Kennels Cottage (608128, 244214) and 100m to the south west of the track (608027, 244151) in order to avoid its visibility in key views from the Grade II* listed ancillary buildings located to the north of Hintlesham Hall, which comprise the converted service ranges, stables, coach house and brewhouse'</i>.</p> <p>The Applicant disagrees that there would be a need to consult final pylon locations given that measures have already been incorporated to ensure that pylons avoid the area agreed be sensitive and the effects would be not significant.</p>
5.5.2	Hintlesham Hall	SCC/BMSDC considers that the mitigation strategy in respect to Hintlesham Hall outlined in document Project Development Options Report, January 2022 should be 'pushed further', for example seeking to reinstate more of the parkland surrounding Hintlesham Hall, be that via a change of use of the field immediately opposite the Hall	No significant effect has been identified to the Hall and, therefore, no additional mitigation is proposed. However, the Applicant is proposing to partially restore the original tree lined avenue to the south-west of Hintlesham Hall (Environmental Area ENV02) as described in the Environmental Gain Report [APP-176]. The enhancement proposals balance enhancing the parkland features whilst

		or potential replanting of the now segmented avenue of trees that once led west from the Hall.	limiting impacts on the surrounding land use and local farming businesses.
5.6 Landscape and Visual			
5.6.1	Visual Mitigation for the CSE Compounds	<p>SCC and BMSDC considers that there is no detailed information regarding the planting around the CSE compounds.</p> <p>SCC (Landscape) considers the visual mitigation for the CSE compounds insufficient for Dedham Vale West CSE compound at Leavenheath and Stour Valley West CSE compound at Alphamstone in Essex.</p> <p>SCC also consider that, at Dedham Vale East CSE compound at Polstead Heath, the proposed hedgerow reinforcement along Millwood Road will be essential.</p> <p>SCC also note that during the Thematic Meeting on 12 December 2023 some small progress was potentially made with regards to CSE compound planting.</p> <p>BMSDC state that they are unconvinced by extent and sufficiency of proposed mitigation and lack of compensation for residual effects and this could be resolved through a future iteration of the LEMP.</p> <p>ECC also consider the landscape screening for the Stour Valley West CSE compound at Alphamstone in Essex insufficient.</p>	<p>At a meeting held with SCC and BMSDC on 12 December 2023, the Applicant reconfirmed that detailed planting plans would be provided, including of the CSE compounds, to the Host Authorities at detailed design stage, as per Requirement 9 of the draft DCO. However, the Applicant has also updated the wording of Requirement 9 at deadline 6 (Document 3.1 (F)) for clarity.</p> <p>The Applicant disagrees that visual mitigation is insufficient for Dedham Vale West CSE and Stour Valley West CSE and that the siting of these two CSE compounds and use of existing landform and vegetation has limited the visual effects. However, the Applicant will consider the additional hedgerow at Dedham Vale West CSE as discussed on 12 December 2023 and will respond at Deadline 7.</p> <p>Reasons for limited planting at Stour Valley West CSE are well documented in the Applicant's previous responses. However, a hedgerow will be added to the southern edge of the Stour Valley West CSE compound at the request of the Host Authorities. This will be included in LEMP Appendix B: Reinstatement Plan [REP3-036] at Deadline 7.</p> <p>At Dedham Vale East CSE, a hedgerow has already been included along Millwood Road and an action was taken from the meeting on the 12 December 2023 to further explore additional hedgerow and planting near the permanent entrance. The Applicant is reviewing this and will respond further at Deadline 7.</p> <p>The Applicant will continue to discuss the LEMP and Appendices with the Host Authorities.</p>
5.6.2	Landscape and Visual Impacts	<p>Landscape impacts between Stour Valley East and Dedham Vale West CSE compounds</p> <p>BMSDC state that, notwithstanding the mitigation effect of the removal of the 132kV line, the increased height of the proposed pylons for the 400kV cable route have an adverse effect over extended areas, and when combined with the detracting effect of existing pylon runs (landscape impacts). Consideration of undergrounding or a credible compensation plan as part of or separate to the LEMP.</p>	<p>The Applicant notes the comments and will continue to discuss the LEMP with the local authorities but considers that the reinstatement and mitigation proposed is appropriate and no additional undergrounding or compensation is required.</p>

		<p>Visual impacts between Stour Valley East and Dedham Vale West CSE compounds BMSDC also consider that there is under-recognition of the adverse visual effect of proposed pylons in close-up views, notably for PRow users, an over reliance on existing and proposed planting to mitigate adverse effects of pylons, and need for compensation for residual effects (visual impacts). Could be resolved through a future iteration of the LEMP and a credible compensation plan as part of or separate to the LEMP.</p> <p>Landscape and visual effects in the River Brett Underestimate of landscape and visual effects in the River Brett (including Benton End) and River Gipping (including edge of historic parkland to Hintlesham Hall). Consideration of undergrounding or a credible compensation plan as part of or separate to the LEMP.</p>	
5.7 Traffic and Transport			
5.7.1	CTMP	<p>All Host Authorities comment that <i>'The Traffic and Transport section should include a statement around requiring more extensive monitoring, controls and enforcement for construction traffic, as it is almost absent from the documents, as well as further information on the assessment method.'</i></p> <p>ECC note that there is an absence of monitoring of construction and workforce traffic. It is understood that Good Practice Measure TT02 will ensure Global Positioning System (GPS) monitoring of construction routes and there is an indication that construction traffic will be recorded at paragraph 7.2.4. Further information is sought on what traffic is to be monitored and how vehicle numbers will be reported to the highway authorities.</p>	<p>The Applicant will monitor the vehicles entering and exiting each site, including the times of access. The Applicant is willing to secure sharing this data with the Local Highway Authorities. Further measures have also been added to the CTMP to provide detail on targets for vehicle sharing, use of crew vans and information sharing on Travel Plan data collected.</p> <p>The Applicant is also continuing discussions with the Local Highways Authorities on potential monitoring and enforcement measures to identify any areas where approaches can be agreed. The method of monitoring and enforcement may depend on the measure being discussed.</p> <p>However, as noted in point 4.5.1 of the points not agreed, the Applicant is not in agreement that there should be a measure that restricts daily traffic at each access to the levels predicted in the Transport Assessment.</p>
5.7.2	PRow Sequencing Details	<p>SCC is unable to carry out full assessment of impact of severance without sequencing details.</p>	<p>The sequencing of PRow closures would not result in a significant effect on PRow users as in all cases, the effects on PRow are very short term and temporary in nature with no effects during operation.</p> <p>As set out in Appendix A of the PRow Management Plan [REP3-056], most individual PRow closures are expected to be for four weeks or less. The PRow Management Plan states that <i>'for each location where a PRow is affected by</i></p>

			<p><i>construction work, consideration has been given to limiting the impact on users of PRow based on a hierarchy of management measures’.</i></p> <p>PRoW surveys have been completed at various points throughout the study area. The 2023 PRoW surveys (detailed in Appendix C of the Applicant’s Response to Issue Specific Hearing 1 Action Points [REP1-034]) covered all routes with expected individual closures of longer than four weeks, and all routes allocated a sensitivity rating of ‘Moderate’ or above. The results of the surveys have shown that there is very low usage on PRoW across the Order Limits, including on weekends.</p> <p>The dates of PRoW closures would be determined during the detailed design stage (in common with other NSIPs) following the appointment of a Main Works Contractor. The Public Rights of Way Management Plan (PRoWMP) [REP3-056] states that exact details of the forms of closure will be <i>‘subject to discussion with the PRoW Officers at Essex and Suffolk County Councils. This would include management to prevent concurrent closures which may compound impact on PRoW users... All work will be prepared as far as possible in advance to limit the impact on the PRoW and the users of it’.</i></p> <p>However, the Applicant has prepared tables which set out the indicative sequencing of the PRoW closures for information, which will be provided at Deadline 6 (Technical Note on Public Right of Way Closure Sequencing (document 8.8.9)).</p>
5.7.3	Structural surveys and repairs	<p>Referring to Section 59 of the Highway Act 1980, the Applicant’s project has the potential to result in extraordinary traffic, particularly due to AILs, and thus cause additional damage to the highway beyond usual traffic that can be expected to use the network. SCC, the Local Highway Authority, considers that it is unreasonable to expect Suffolk (and Essex) ratepayers to solely fund any additional repairs necessary to maintain the highway when used by this additional traffic by the project.</p> <p>ECC note that Surveying of the condition of the highway network for remediation. Partially resolved. Further information is needed.</p>	<p>Whilst the large AIL vehicles required for the construction of the project are large in size, they are not large in number, with approximately 200 over the construction period. The Applicant also notes that the traffic effects are also temporary (during construction only).</p> <p>Section 5.2 of the CTMP [REP3-030] sets out proposals for pre-construction surveys of affected sections which would identify and record the current condition and states that:</p> <p><i>‘The records will be available for comparison following reinstatement and after the works have been completed, to demonstrate that the standard of reinstatement at least meets that recorded in the pre-condition survey.’</i></p>

			<p>This topic was also discussed at ISH3 and is addressed in the Applicant’s summaries of oral submissions [REP4-050] at page 10. The Applicant noted that Section 59 is an existing statutory provision allowing for such circumstances, and hence the Applicant submitted at the hearing that it is not necessary to replace that provision. The Applicant is happy to share survey data and is of the view that Section 59 already provides the mechanism to deal with this issue.</p>
5.7.4	Road Signage	<p>SCC (Local Highway Authority) considers that Signage on the local highway network should either be authorised through the New Roads and Street Works Act 1991 permit system if a ‘standalone’ operation e.g. direction signs to site compounds, or through the s278 approval process if associated with physical highway works such as access construction or removal.</p>	<p>The Applicant notes that signs have not yet been designed and this will form part of the detailed design work and proposals by the Main Works Contractor, and that the Permit Scheme is applicable for only some forms of signing. The Framework Highways Agreement may be the most appropriate securing mechanism for approval of signage not authorised through the Permit Scheme.</p> <p>Parking restrictions and associated signs and markings are provided for in the dDCO (document 3.1 (F)) (updated at Deadline 6) and the detailed proposals would be submitted for consultation and response by the Local Highways Authority. The Applicant would make the appropriate applications for approval once proposals have been identified and enforcement can be discussed at that point. The need for parking restrictions, their location and detail of proposals cannot be determined at this stage and may in reality be very limited. It is, therefore, considered premature to discuss enforcement of these restrictions.</p> <p>The Applicant would keep parking restrictions to the minimum required for construction of the project.</p>
5.7.5	Feasibility of AIL routes	<p>SCC (Local Highway Authority) considers that further work is required to demonstrate that the AIL access routes are feasible. This is in terms of dimensions such as the risk of loads oversailing third party land and the impacts on street furniture and load capacity of highway structures.</p>	<p>The Applicant had carried out assessments of AIL routes, including driving routes with the Police and assessing their suitability. These reports were provided to the Host Authorities on 8 December 2023 and have been submitted into Examination at Deadline 6, see Reports on Abnormal Indivisible Load Access for Cable Drums, Transformers and Shunt Reactors (document 8.8.11). The Applicant hopes that this information will provide some reassurance that routes are feasible and appropriate for the project.</p> <p>The AIL application submitted prior to vehicle movements made by the Main Works Contractor will address structures affected, street furniture and any third-party land impacts and programming and operational arrangements to</p>

			accommodate the movements with minimal impact on the network.
5.7.6	Port Traffic Management Plan	SCC (Local Highway Authority) considers that if the project requires use of ports that creates a significant volume of traffic that exceeds that permitted by extant a Port Traffic Management Plan should be submitted for approval.	The project is not anticipated to generate enough traffic at a port to warrant a Port Traffic Management Plan. As stated in the Transport Assessment [APP-080] the traffic flows are relatively low, and specific procedures apply to ALL movements.
5.7.7	Parking Restrictions	SCC (Local Highway Authority) considers the proposed parking restrictions are disproportionate for example in terms of signage and road markings compared to the risk of parked vehicles obstructing the carriageway	The Applicant notes the observations and agrees that parking restrictions should be kept to a minimum to achieve the safe access required.
5.7.8	Visibility Splays	SCC (Local Highway Authority) remains concern that inadequate information has been provided to allow the authority to assess the scale of vegetation required to provide safe access to the site, nor that the order limits are, in combination with land within highway control, sufficient to provide the required visibility	<p>The Applicant has agreed to provide more information to SCC (and ECC), which so far comprises:</p> <ul style="list-style-type: none"> ● Shapefiles containing access points, Order limits and vegetation removal plans; ● Data on construction traffic numbers per access supplied in pdf at Deadline 4 [REP4-006] and excel to SCC and ECC; ● Drawing of access at the A131 temporary access route junction including swept path drawings of the access and temporary access route [REP5-026]; and ● Data obtained through surveys of traffic flow and speed for the project (not submitted to Examination as very large dataset) by file transfer to SCC and ECC; <p>The information above will help SCC and ECC to understand the potential constraints and requirements for the access designs. Discussions are ongoing.</p>
5.7.9	Bellmouth Design and Use of Accesses	<p>SCC would disagree that the generic bellmouth design accommodates all vehicles. An understanding of the estimated traffic at each location would assist SCC in understanding if mitigation such as traffic control could be used to reduce the impacts at specific locations.</p> <p>ECC consider that details of the relative use of accesses is currently unclear. Greater understanding of this use would give confidence in understanding the relative level of impact at different sites.</p>	Requirement 11 on the dDCO (document 3.1 (F)) states that: <i>'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'</i> . At Deadline 5 additional clarification was added to Requirement 11 to make it clear that this requirement applies to all accesses, even those constructed as part of pre-construction works.

			<p>Requirement 11 of the dDCO provides the Local Highway Authorities with reassurance and control over the final access designs and enables this detail to be agreed at a later stage. This is a proportional approach given that many of the accesses are temporary for the construction period and/ or associated with very low usage during operation.</p> <p>However, the Applicant has agreed with SCC and ECC that a select number of accesses will be looked at in more detail now to allay concerns, with a list of the accesses proposed for further investigation provided to SCC and ECC for comment on 6 December 2023. Where bellmouths and visibility splays are developed, they will also be submitted into Examination when finalised.</p>
<p>5.7.10</p>	<p>Temporary Access off the A131 Alignment Options</p>	<p>ECC consider that there is less justification provided for the precise alignment of the haul route as proposed, comparatively to other potential suggested options by the landowners which would have less impact on their farming activities.</p> <p>ECC also consider that evidence has not been submitted that the proposed access arrangements and ghost island can be accommodated within the existing road layout.</p>	<p>The Applicant notes the observations and confirms that the benefits of an off-network temporary access route in this area are considered to substantially outweigh the adverse effect of the widening that would be required in any on-road sections of this route and traffic management.</p> <p>The Applicant provided written details of this optioneering and the reason for discounting these options at Deadline 4 by an update to the Technical Note in the submission of Technical Note on Temporary Access Route off the A131 [REP4-009]. The Applicant has looked at all salient factors including farming operations, and it is the Applicant's position that the option selected and included in the application for development consent is considered to be the most appropriate taking account of the assessment undertaken (including environmental impact; engineering requirements; highway design, access and safety; and consultation feedback).</p> <p>Further information was submitted on the A131 temporary access route at Deadline 5 [REP5-026], including a concept design of the bellmouth at this junction and swept path analysis of the junction and the temporary access route. This evidence demonstrates that a safe access can be designed at this location suitable for the vehicles proposed within the Order limits; and that the temporary access route itself is suitable for the vehicles proposed. It is hoped that this detail will provide reassurance to SCC and ECC on this matter.</p> <p>At Deadline 6 the Applicant also submitted a Swept Path Assessment for Alternative Temporary Access Routes off</p>

			the A131 providing further information on the highway design constraints that contributed to the selection of the proposed route over two routes proposed by interested parties.
5.7.11	Assumptions within the Transport Assessment	<p>ECC have concerns regarding the assumptions within the Transport Assessment and are looking to minimise the risks associated with these assumptions through relevant controls. These risks relate to the following:</p> <ul style="list-style-type: none"> • Total staff numbers. • Peak construction vehicle numbers • Staff shifts patterns and as a result the assessment hour • The use of the staff mini-bus (crew bus) • The assessed proportions of car sharers <p>There are no mechanisms in place that guarantee these HGV numbers, shift patterns or the travel proportions by minibus, which could result in substantially increased impacts on the highway network during the peak hour. This brings significant risk to the conclusions of the assessment.</p>	<p>The assumptions made in the Transport Assessment [APP-061] on shift patterns, worker numbers and trips are considered to be reasonable worst-case assumptions based on National Grid’s standard practices for construction of transmission lines and the knowledge of an experienced contractor in electrical infrastructure delivery. The Applicant is confident that the assessment is robust and impacts on the local road network have been limited through use of temporary access routes.</p> <p>The majority of traffic is during the construction period and spread out over a long, linear project. It is not considered necessary or proportionate in this context to restrict shift patterns or worker trips by securing these in Management Plans. To do so would place an unnecessary administrative/management burden on a contractor without strong justification. The Applicant contends that this would be the position whether or not a Main Works Contractor was in place at the present time.</p> <p>However, to address comments raised, the Applicant has proposed additional text in the CTMP submitted at Deadline 6 to provide more onerous targets on vehicle sharing and use of crew vans. The Applicant has also added text agreeing to record and share information on staff numbers per work site to aid understanding of modal share and to aid discussions where targets are not met.</p> <p>As set out during ISH3 under agenda item 4.1 (written record in [REP4-050]), the Applicant made the following points regarding control on staff shift patterns:</p> <ul style="list-style-type: none"> • The proposed working hours used in the Transport Assessment and ES are standard practice for a project of this nature and have also been applied to other recent National Grid projects including the Hinkley Connection (7am-7pm weekday working hours). • In addition, other nearby NSIPs have also assumed similar hours:

			<ul style="list-style-type: none"> - Lower Thames Crossing (LTC) project assumes similar working hours as set out in section 6.4 of the CoCP [REP6-038 of the LTC Examination Library]. - A12 Chelmsford to A120 Widening Scheme also includes working hours of 7.30am to 7pm in the week and extended working hours of 7am to 9pm during summer months as set out in section 6.2 of the Outline Construction Traffic Management Plan (CTMP) [REP6-054 of the A12 Examination Library]. - The LTC and A12 projects also both assumed a site set-up hour immediately before specified working hours and a close-down hour immediately after was also assumed. <p>It was clarified by the Applicant that, based on the above evidence, the Transport Assessment and ES assess a reasonable worst case. However, those documents are not designed to capture the impact of improbable or unlikely eventualities. There is therefore a need to retain some flexibility for the Main Works Contractor to respond to these eventualities, which is particularly crucial given that the project programme is built around fixed network outages, which means there is limited scope for programme slippage.</p> <p>It is therefore the Applicant's view that there should not be in place further limits on Main Works Contractor working hours beyond those set out in Requirement 7 of the dDCO (document 3.1 (F)). The Main Works Contractor needs to have the flexibility to respond to improbable eventualities.</p> <p>The capacity of a crew bus is 4-6, with four per crew bus being assumed in the transport analysis as a conservative assumption. It should be noted that the Transport Assessment also assumes 70% of staff travel in crew vans and 30% in their own vehicles. In reality, contractors often don't allow car use so 30% is also a conservative assumption and it is likely that in reality a higher proportion will use crew vans.</p>
5.7.12	Staff Movement and Mode Share	SCC comment that there should be a stronger commitment at Paragraph 6.2.4 of the CTMP that car sharing or the use of a minibus/crew bus will be used for travelling around the site rather than it being assumed.	The Applicant will monitor the vehicles entering and exiting each site, including the times of access. The Applicant is willing to secure this monitoring and share this information with Local Highway Authorities.

		<p>ECC comment that there appears to be:</p> <ol style="list-style-type: none"> a. Absence of commitment to achieve staff modal share through commitment to minibus and car sharing. Not resolved; there continues to be no commitment to achieve the staff mode share. b. Absence of commitments to survey staff movements. The CTMP includes commitment towards surveying of staff movements in the form of a travel survey. This appears to be partially resolved, but further commitment to monitoring of total staff vehicle movements 	<p>The Applicant has included a Travel Plan in Section 6 of the CTMP [REP3-030] to encourage sustainable transportation and reduce single-occupancy car journeys. The Applicant has amended this text at Deadline 6 to provide a stronger commitment to the use of crew vans and a specific commitment on number of personnel per crew van.</p>
<p>5.9 Working Hours</p>			
<p>5.9.1</p>	<p>Working Hours</p>	<p>SCC is of the opinion that the working hours should be restricted and/or phased under the DCO Requirements to ensure the avoidance unnecessary impacts upon residential and rural amenity including from noise.</p> <p>Although, if the working hours proposed by the Applicant are deemed essential to deliver the project in a timely fashion and to ensure that work can be completed to accommodate the required network outage windows, it is essential that there are:</p> <ul style="list-style-type: none"> • Effective and robust schemes of engagement with local communities during construction, and • Effective construction management plans that are secured through DCO requirements, and • Effective embedded mitigation measures and contingency funds to secure additional mitigation if required; to mitigate any unforeseen impacts on both public and private amenity during construction. <p>SCC state that no additional detail appears in respect of Section 2.3.2 of the CEMP which stated that a period of one hour either side of the working hours may be used for training, briefing and general housekeeping but not operating of plant or equipment. This would extend the working hours to 06.00 – 20.00 hours Monday – Friday and 07.00 – 18.00 on other days. A 06.00am start is</p>	<p>The Applicant has undertaken further work around the working hours to identify whether commitments can be made to reduce potential disturbance to local communities during construction. To this effect, the Applicant has made a new commitment to not undertake percussive piling (one of the noisiest activities anticipated on the project) on Sundays and Bank Holidays and this wording was added to Requirement 7 of the dDCO at Deadline 5 (document 3.1 (F)).</p> <p>In addition, the Applicant has undertaken a review of the duration of noisy activities and where these are located near noise sensitive receptors (noting that this is a rural location where the works are typically at a distance from community receptors), with the intention of making further commitments in relation to these specific locations. This information is presented in the Technical Note for Noise Sensitive Receptors at Deadline 6 (Document 8.8.7). The Applicant is awaiting feedback from the Councils on the locations identified and will then review whether further commitments or measures can be provided at the agreed list of locations.</p>

		<p>unacceptable in areas close to residential dwellings as the arrival of staff of site may result in loss of amenity.</p> <p>SCC recommendation remains that working hours should be restricted as follows;</p> <ul style="list-style-type: none"> • 08:00 - 18.00hrs Mondays to Fridays • 9.00 - 13.00hrs Saturdays • No working and/or plant operated on Sundays and Bank Holidays. <p>Deliveries to the development/use only within these times.</p> <p>ECC comment that they will try to work with the Applicant to resolve these issues for example by suggesting some working time limits for any one receptor. This could take the form of a number of weeks working time for a singular receptor.</p>	
5.10 Lighting			
5.10.1	Lighting Design Strategies	<p>SCC requests details of the finalised lighting proposals, type of luminaire used, i.e., directional, hooded, lux levels. Around CSE compounds lux plans and lighting design strategies for permanent lighting are required.</p>	<p>The CEMP [REP3-024] identifies typical lighting methods and levels that a contractor would utilise to illuminate the works.</p> <p>Unless stated otherwise below, the construction lighting will be installed in accordance with GN01:2020, BS EN 12464-2-2014 (Outdoor Workplaces). Lighting will be the lowest average lux levels necessary for safe delivery of each task and will be positioned and directed to reduce the intrusion into adjacent properties and habitats.</p>
5.10.2	Lighting Plans Near NSRs	<p>BMSDC would ask that site specific lighting plans near to NSRs be submitted in advance</p>	
5.10.3	Construction Compound Lighting	<p>ECC/BDC comment that for the main construction compound which will be there for a significant period of time, where the Councils could approve some fixed lighting positions and specifications</p>	
5.11 Management Plans			
5.11.1	Management Plans – General	<p>SCC and BMSDC generally consider that the 'Management Plans' documents should be viewed as live, and subject to revision, rather than final documents.</p>	<p>The Applicant would welcome sight of the Council's specific concerns regarding the Management Plans so that the Applicant can (to the extent practicable) consider these during the remainder of the Examination. The Applicant has received comments on the LEMP and will be responding to these at Deadline 7.</p>
5.11.2	CTMP	<p>SCC is of the opinion that the CTMP lacks details and should be treated as an outline document which following consent would be replaced by a detailed version provided by the main contractor and approved under a requirement.</p>	<p>The Applicant disagrees that the CTMP is an outline document but is continuing discussions on changes and additional information that would satisfy SCC and ECC, particularly around welcome sight of the Council's specific concerns regarding the Travel Plan.</p>

		<p>ECC comment that aside from construction routeing, there appears to be little control or management on construction traffic or construction worker movements within the CTMP [REP3-030].</p> <p>SCC and BMSDC have requested that Requirement 4 (3) should be amended to provide that any departure from the CTMP should be agreed with the 'relevant highway authority'.</p>	
5.11.4	PRoW Management Plan (PRoWMP)	<p>SCC considers that any proposed changes to the PRoWMP would also be required to be agreed with the relevant Highway Authority.</p> <p>SCC and note that there are limited details provided on engagement with community and wider users and method of engagement.</p> <p>ECC comment that limited details have been provided on engagement with the community and wider users and the proposed method of engagement. Paragraph 3.3.1 requires expansion beyond residents. Engagement would additionally be required with relevant user groups for the status of the route and the wider community.</p>	<p>The PRoWMP [REP3-056] is one of the plans listed in sub-paragraph (2) of Requirement 4(1) in the draft DCO (document 3.1(E)) which states: 'All construction works forming part of the authorised development must be carried out in accordance with the plans listed in sub-paragraph (2) below, unless otherwise agreed with the 'relevant planning authority' or other discharging authority as may be appropriate to the relevant plan concerned.'</p> <p>Further details on the change process are set out in Section 6.5 of the PRoWMP [REP3-056].</p> <p>The CTMP provides over-arching requirements for community engagement and public information in section 8.4. The Applicant requests the authority to identify user groups that should be advised in order that arrangements can be made.</p>
5.11.5	CEMP and Appendices: A. CoCP B. REAC	Content under discussion.	Content under discussion.
5.11.6	MWMP	Content under discussion.	Content under discussion.
5.12 Planning Matters			
5.12.1	The Overall Planning Balance	<p>SCC also consider that a focus only on impacts which are assessed as 'likely significant effects' and an effective discarding of any impacts assessed to be below the level of a 'significant' effect would not be an adequate or robust assessment of the impacts of the proposal. The process of EIA informs that decision making but it is not a substitute for it. When undertaking a planning balance of overall (residual) harms and benefits the Applicant (understandably) brings into account the totality of the benefits that would be delivered by the proposal. It would be a distortion of the planning balance to then leave out of account or to treat as immaterial adverse impacts that</p>	<p>The designated National Policy Statement (NPS) EN-1 (2011) states that:</p> <p><i>'4.2.4 When considering a proposal the IPC should satisfy itself that likely significant effects, including any significant residual effects taking account of any proposed mitigation measures or any adverse effects of those measures, have been adequately assessed.'</i></p> <p><i>'4.2.11 In this NPS and the technology-specific NPSs, the terms 'effects', 'impacts' or 'benefits' should be understood to mean likely significant effects, impacts or benefits.'</i></p>

		<p>have been identified but which are assessed as being below the level of a significant effect.</p>	<p><i>‘4.1.3 In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account:</i></p> <ul style="list-style-type: none"> <i>• its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and</i> <i>• its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.’</i> <p>Hence the NPS is clear in its focus on the identification, avoidance, reduction and compensation of likely significant effects, in the decision-making balance. Whilst the Applicant agrees that effects (whether beneficial or adverse) that are not significant can be taken into account and weighed in the planning balance, the weight given to these effects is generally limited given their treatment in policy. The Applicant has set out its position in respect of the planning balance, in its Planning Statement [APP-160] paragraph 10, including in respect of adverse effects at paragraphs 10.4 and 10.5. In the context of a major infrastructure project, the residual adverse effects are considered to be very limited and should be considered in the context of the significant benefits of the project (contributing to energy security, supporting the transition to net zero and other significant beneficial effects, such as those achieved through the removal of the 132kV line, the removal of a section of 400kV line and undergrounding the proposed 400kV line).</p>
5.12.2	<p>Consideration of the Statutory Purpose of the AONB</p>	<p>SCC supports the Dedham Vale AONB and Stour Valley Partnership’s view that there will be a significant impact on the ability of the AONB to deliver statutory purpose during the construction of underground cables.</p>	<p>As concluded both in the Dedham Vale AONB Special Qualities and Statutory Purpose [REP1-032] and in ES Chapter 6: Landscape and Visual [APP-074], the Applicant acknowledges that there would be short term adverse effects on some of the natural beauty factors and special qualities of the AONB (notably perceptual qualities such as scenic quality, remoteness and tranquillity) during construction and that when taken together these effects are considered to be significant. However, these effects would occur in an area where these qualities are already undermined by the presence of the existing 132kV and 400kV overhead lines and by proximity to commercial fruit farming. The effects would also be temporary (up to four years) and reversible once the farmland has been restored</p>

			<p>and hedgerows reinstated. The absence of roads through this part of the AONB and presence of only one PRow along the wooded Box Valley (which will be crossed by means of a trenchless crossing) also means that there are few public locations from where the effects of the construction activities would be experienced. Therefore, although there would be temporary, localised effects during construction, these are not anticipated to impact on the ability of the AONB to deliver its statutory purpose.</p> <p>Adverse effects should be considered in the context of the long term significant beneficial effects to the AONB that will result from the removal of overhead lines and their replacement by underground cables.</p>
5.13 Socioeconomics			
4.13.1	Socio-Economics and Other Community Matters: Employment	<p>SCC maintain the view that until a full workforce profile has been provided, the Applicant cannot assume there will be no likely significant socioeconomic effects.</p> <p>SCC expect the Applicant to prepare and implement an Employment, Skills and Education strategy once a detailed workforce assessment has taken place and the socio-economic impacts of this have been considered in full.</p> <p>ECC consider that an employment and skills plan or strategy should be prepared prior to the commencement of construction. This should set out measures that the Applicant will implement in order to advertise and promote employment opportunities associated with the proposed development locally.</p>	<p>It is the Applicant's case that a workforce profile has been provided. This level of local employment, based on a peak monthly employment assumption of 350 workers, could result in the peak monthly local job demand being up to approximately 35 jobs locally, which could be accommodated from the local labour pool.</p> <p>The Applicant does not consider that an Employment, Skills and Education Strategy is needed on this project given the low number of jobs that would be created and that many will require trained specialists who are qualified to work on high voltage electricity lines sourced from the Applicant's existing pool of approved contractors.</p> <p>National Grid are delivering social value at a corporate level, including measures targeted at East Anglia looking at employment, skills and education. These measures are outside the DCO process but are being discussed with Host Authorities to see if this matter can be agreed.</p>

6. Approvals

Signed

On Behalf of

Name

Position

Date

Signed

On Behalf of

Name

Position

Date

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)

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