



Suffolk County Council (20041323)

Comments on any other submissions
received at Deadline 6

Bramford to Twinstead (EN020002)

Deadline 7

17 January 2024

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Glossary of Acronyms

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

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

Purpose of this Submission

The purpose of this submission is to provide responses to the Applicant’s Deadline 6 (D6) submissions and representations made by other interested parties at D6, as appropriate. Examination Library references are used throughout to assist readers.

1 Comments on any other submissions received at Deadline 6

7.1 (B) Planning Statement (Tracked) [REP6-012]

1.1 Table 1 below relates to Table F.1 of Appendix F (Signposting for Compliance with EN-1 (November 2023)) of the Issue B Planning Statement.

Table 1: SCC Table of Comments on the Planning Statement [REP6-012]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
1a	Environmental Effects / Considerations	4.3.4	<p><u>Socioeconomic Factors</u></p> <p>Many of the contributory factors affecting social and economic effects such as employment, community services and health and well-being were scoped out of the assessment in the Environmental Impact Assessment Scoping Report Main Report [APP-156] and this was confirmed in the Scoping Opinion [APP-159]. Therefore, no separate reporting is required and a standalone socio-economics chapter has not been included within the ES. Instead, the Socio Economics and Tourism Report [APP-066] sets the reasons why significant social and economic effects are not anticipated. This</p>	<p>The delivery of Net Zero in the UK by 2050 is expected to require a pipeline of generation and connection projects in Suffolk. By way of brief summary (and leaving aside those under construction) these include, in addition to the B2T Application, Sizewell C nuclear power station (construction planned for from now until 2036), East Anglia One North offshore windfarm (construction planned for 2025 to 2029), East Anglia Two offshore windfarm (construction planned for 2025 to 2029), Sunnica Energy Farm (construction planned for 2025 to 2027), Norwich to Tilbury Grid Reinforcement (construction planned for 2026 to 2030), Sea Link Interconnector (construction planned for 2025 to 2029), and LionLink Multi-Purpose Interconnector (construction planned for 2026 to 2030). It is reasonable to expect that these projects will (in part) be recruiting from the same 'pool' of both skilled and unskilled construction workers and will also be providing a significant stream of work for the local economy and the local supply chain.</p>

			<p>document sits outside the ES and concludes that the project is still unlikely to generate significant effects on these topics.</p>	<p>Therefore, significant changes for the economy, environment and communities of Suffolk can be expected as a result. SCC has set out in its Energy and Climate Adaptive Infrastructure Policy¹ how it intends to maximise the benefits to Suffolk’s economy and supply chains, employment opportunities, skills and training provision.</p> <p>SCC (Skills) can only maximise the benefits of any project once the impacts are properly understood. Throughout the Examination and Consultation stages for Bramford to Twinstead Reinforcement, SCC have maintained that the Applicant has not provided a thorough, evidence based, examination of the likelihood of local employment opportunities on the project. We have requested throughout that the Applicant defines the skill sets needed within its workforce and compares this to the skills available within the local labour market, this would provide an evidence-based approach to assessing likelihood of socio-economic skills impacts.</p> <p>SCC believes that this is necessary to ascertain the likelihood of impacts to ensure if there are any negative impacts they are properly mitigated and to maximise positive opportunities for the local community and that until such a workforce profile is provided the Applicant</p>
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¹ <https://www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf>

				<p>cannot assume there will be no likely significant socio-economic effects.</p> <p>Once thorough assessment has taken place, SCC would then expect to work with the Applicant and their associated supply chains, contractors and local partners to recruit and train local people ahead of the construction period which will ensure that they develop their skills and are enabled to move between roles and different types of contracts as we see further grid replacement and reinforcement work. This project, as part of the wider energy infrastructure construction projects in Suffolk and the East of England, is an opportunity to generate skills and employment outcomes and subsequently contribute to the achievement of both national and local policy objectives. These activities secured within the DCO, providing confidence in the Applicant’s commitment to maximise positive opportunities for the local community.</p> <p>SCC believes there is still an opportunity to progress this work with support from the Examining Authority.</p>
1b	Community Benefits	5.13.11 and 5.13.12	National Grid promotes the use of local supply and small/medium enterprises through main contractors by embedded targets within its framework contracts. National Grid will continue to work	As stated in SCC’s <i>D6 Response to the Applicant’s Comments on any other submissions received at Deadline 4 [REP6-059]</i> , SCC (Planning) outlined its position on community benefits in Table Ref 15b (Education, Skills and Education Strategy).

			<p>with relevant planning authorities and business leaders at a national, regional and local level to identify opportunities to invest in employment networks, including looking for opportunities to work with local businesses.</p> <p>National Grid 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 National Grid’s existing pool of approved contractors. However, National Grid is committed to continuing discussions with the Councils and other key stakeholders regarding their aspirations in respect of community benefits. These discussions would be outside of the DCO process.</p>	<p>Further, SCC (Planning) agrees with the comments made by Essex County Council and Braintree District Council in their response to this item.</p>
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7.3.1 (C) Draft Statement of Common Ground Local Authorities (Tracked) [REP6-016]

Table 2: SCC Comments on the Draft Statement of Common Gound Local Authorities [REP6-016]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
2a	Structural Surveys and Repairs	5.7.3	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>SCC (LHA) notes that the Inspectors Report on the National Grid (Hinkley Point C Connection Order) indicates that National Grid and the Highway Authorities agreed to include condition surveys to assess deterioration of the local road network.² SCC's position is that it is seeking similar measures to be included within a side agreement.</p> <p><i>5.13.110 The matter of funding for repairs to the LRN necessary as a result of the additional traffic that would be generated by the proposed development was considered during the Examination. The terms of the s106 agreement [Doc 8.4B, Schedule 2 Section 3] mean that the Applicant would carry out a baseline deflectograph condition survey prior to the construction of each bellmouth access and submit the results to the highway authority. This process would be repeated within 3 months of the end of the construction period and the Applicant would pay to the highway authority that part of the reasonable costs of reinstating the highway to its former condition attributable to project traffic.</i></p>

² https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020001/EN020001-004121-151019_EN020001_HPCC_ExA_Report_to_SoS_Main_Report.pdf

7.5.2 (D) CEMP Appendix B Register of Environmental Actions and Commitments (Clean) **[REP6-023]**

Table 3: SCC Table of Comments on the REAC [REP6-023]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
3a	Repetition of the OWSI			SCC (Archaeological Service) notes that the REAC contains a copy and paste of the details within the OWSI, this is not needed as the information will be set out within the OWSI once approved, and the REAC should only link back to this document.
3b	Proposals for an Improved REAC			<p>SCC (Archaeological Service) would advise the following for the REAC:</p> <ol style="list-style-type: none"> 1. REAC shall set out provision for the implementation of the Outline Written Scheme of Investigation (OWSI). <ol style="list-style-type: none"> a. The draft OWSI presented in the ES (application document 7.10) [APP-187], and subsequently updated at D5 [REP5-016], set out the details to mitigate the impacts of the proposal on currently unknown heritage assets that would be damaged or destroyed by construction. The OWSI will be updated as further information from the archaeological evaluation becomes available. b. The OWSI sets out the scope of Detailed Written Scheme of Investigations, which will detail the site-specific mitigation measures

				<p>for the protection or recording of below-ground heritage assets, to be implemented before or during construction at locations identified within the OWSI and DWSIs.</p> <ol style="list-style-type: none"> 2. REAC shall ensure that the archaeological works do not extend beyond the order limits and limits of deviation for the project. <ol style="list-style-type: none"> a. The extent of intrusive archaeological investigations and mitigation shall not extend beyond the order limits (red line boundary) as defined in Document 6.2.4 Project Description [APP-072] Table 4.1 and displayed on the Document 2.5 Work Plans [APP-010]. 3. REAC shall ensure that a detailed project design for the Palaeoenvironmental and geoarchaeological works for the trenchless river crossings. 4. REAC shall ensure the fencing off of archaeological mitigation areas. 5. REAC shall ensure that the DWSIs will set out the arrangements for responsibilities for implementing, monitoring and auditing the mitigation measures identified within the DWSIs. <p>REAC shall ensure that Local Authority Archaeological</p>
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				Advisors have access to the project to monitor and sign off relevant work.
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8.8.11 Reports on Abnormal Indivisible Load Access for Cable Drums, Transformers and Shunt Reactors [REP6-038]

Table 4: SCC Table of Comments on AIL Access for Cable Drums, Transformers and Shunt Reactors [REP6-038]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
4a	AIL movements	8.8.11	AIL Reports	SCC (LHA) welcomes submission of these document as the provide a level of comfort that assessments have been undertake regarding the proposed routes. The authority notes that the highway network changes and that the reports do not ensure that when the loads are required to be moved that there are no constraints on this process.

8.8.6 Applicant’s Response to Interested Party Comments on Management Plans **[REP6-046]**

Table 5: SCC Table of Comments on the Applicant’s Response to Interested Party Comments on Management Plans [REP6-046]				
Ref	Topic	Ref No.	Summary of Comments	SCC’s Comments
5a	Applicant’s Response to Interested Party Comments on Management Plans [REP6-046]	8.8.6 Table 4.1 - Comments on the LEMP	Landscape and Ecological Management Plan	<p>SCC (Landscape) welcomes that some of the comments made at Deadline 5 [REP5-036] will be reflected in the revised LEMP, which is expected to be submitted at Deadline 7.</p> <p>However, from the Applicant’s response it is expected fundamental concerns with regards to the LEMP remain unresolved. These include:</p> <ul style="list-style-type: none"> • SCC considers the provision of protective fencing to be inadequate. This includes, but is not limited to, the fact that to date no Tree Protection Plans have been provided. (6.2.1) • The insistence of treating the LEMP presented for consent as the final control document, even though in SCC’s experience this is not only not practicable, as there is not yet an appointed contractor and there are too many details unknown or will be in need of updating/refining post-consent; it is also, that this approach does not appear to be compatible with the Rochdale envelope principle applied at consenting stage. • SCC considers that hard surfacing materials should be approved by the relevant planning authority, to avoid unnecessary impacts on the

				<p>environment and the local landscape character. SCC would ask the Applicant to confirm that no hard surfacing materials would be used for any of the temporary access routes. (p.11)</p> <ul style="list-style-type: none"> • SCC is disappointed by the insistence that a five-year aftercare period is sufficient for general hedge and tree planting and the lack of ambition by the Applicant to ensure that the proposed planting of the scheme, should be handed over in a well-established and thriving condition, even if that may require a slightly longer aftercare period. SCC considers that it is essential that there is a robust and effective scheme of monitoring supported by a programme of annual inspections involving the relevant local authorities and that, in the event that the landscape schemes are not progressing successfully, the aftercare period will be extended to ensure the objectives of the planting scheme are met in full. SCC considers this to be an essential control mechanism to ensure that the planting areas will be successful. The requirement for such inspections should be programmed into the relevant control document (i.e. the LEMP. (9.1.4) As there will be a long-term commitment for BNG areas and CSE compounds, it should not be unthinkable to support the remaining planting areas for as long as is necessary to ensure success (9.1.5). • SCC Considers that compensation is not the same as mitigation, although it is part of the Mitigation
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				<p>Hierarchy (1.3.3).</p> <p>SCC will provide more detailed comments, once the revised LEMP will be available, after Deadline 7.</p>
5b	<p>Applicant s response to SCC Response to Action Points from CAH1, ISH2, ISH 3 and ISH 4, received at Deadline 5 [REP5-034]:</p>	2.11-2.12	Timing of HGVs	<p>For clarity, SCC (LHA)'s proposal is that HGV movements on the local highway network are restricted to 1 hour either side of the core hours i.e., 0600-2000 Monday to Friday. The authority's position remains that it considers that no HGV movements other than those required for operations outside core hours as set out in 2.3.2 of [APP-061] should be prevented on Sundays and Bank Holidays with those on Saturday restricted to 0600-1400. This would reduce the impact of traffic on local communities whilst allowing the Applicant flexibility to deliver key parts of the scheme.</p> <p>The concerns raised by the Applicant about early arrivals having to wait to gain access can be resolved through management of deliveries and would be a greater risk if there were no timing constraints.</p>

8.8.8 Transport Assessment Summary of Junction Modelling Analysis [REP6-048]

Table 6: SCC Table of Comments on Junction Modelling Analysis [REP6-048]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
6a	Junction Modelling	8.8.8	Junction Modelling Data	<p>SCC (LHA) welcomes the opportunity to examine the junction modelling supplied by the applicant. Whilst time has not allowed for an in-depth review. The authority notes that data indicates the following junctions have arms that are at or will in the future exceed the theoretical capacity:</p> <ul style="list-style-type: none"> • A1214 Tesco's Roundabout (2025 pm with growth and Construction) • B1113 Beagle Roundabout (2022 am and pm base) • A1071/A134 Junction (2022 am and pm) <p>The authority considers this reflects its concerns that if movements in the network peak are greater than assumed if workers do not arrive and depart at the proposed times. Of concern would be additional delays causing drivers to take additional risks, specifically at the A1071/A134 priority junction.</p>

8.8.9 Technical Note on Public Right of Way Closure Sequencing [REP6-049]

Table 7: SCC Table of Comments on the Technical Note on PROW Closure Sequencing [REP6-049]				
Ref	Topic	Ref No.	Summary of Comments	SCC's Comments
7a	Technical note on Public Rights of Way closure sequencing	8.8.9		<p>SCC (PROW) welcomes the inclusion of closure sequencing of the Public Rights of Way network.</p> <p>The information provided confirms which routes will be affected in conjunction with adjacent parts of the network.</p> <p>The technical note provides adequate information on the phasing of network restrictions. Assessment will be undertaken of the cumulative effect of the closure of the routes and provided at deadline 8.</p>