

Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.10.6: Applicant's Comments on Other Submissions Received at Deadline 7

Final Issue A
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1. Introduction

1.1 Purpose of the Document

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on the other submissions from Interested Parties received at Deadline 7 (17 January 2024) in relation to an application made for development consent for the Bramford to Twinstead Reinforcement (the project).

1.2 Project Overview

- 1.2.1 An application for development consent was submitted to the Planning Inspectorate on 27 April 2023 to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The project would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km comprising of an overhead line, underground cables and a grid supply point (GSP) substation. It also includes the removal of 25km of the existing distribution network, 2km of the existing transmission network and various ancillary works.
- 1.2.2 The application for development consent was accepted for Examination on the 23 May 2023.
- 1.2.3 A full description of the project can be found in Environmental Statement (ES) Chapter 4: Project Description [**APP-072**].

1.3 Structure of the Document

- 1.3.1 While all Interested Parties' responses received at Deadline 7 have been reviewed and considered in detail, the purpose of this document, in the first instance, is not to provide a direct comment on each individual Interested Party response. Instead, where appropriate, the document identifies the key issues raised by the Interested Parties on a 'thematic' basis and provides a thematic comment to those issues. Residual matters which are not covered in the Thematic section at Chapter 2 are commented on in Chapters 3 to 6.
- 1.3.2 The Applicant has commented on the responses to the Examining Authority's Written Questions in the Applicant's Comments on responses to Second Written Questions (**document 8.10.3**) and therefore responses in relation to Written Questions are not covered within this document.
- 1.3.3 The submissions received from other Interested Parties at Deadline 7, and which have been commented on are:
- Chapter 3: Suffolk County Council (SCC) covering the following:

- Comments on any other submissions received at Deadline 6 [REP7-031];
- Response to the Action Points arising from ISH5 and ISH6 [REP7-032];
- Comments on the Outline Written Scheme of Investigation [REP7-034];
- Chapter 4: Essex County Council (ECC) and Braintree District Council (BDC) Deadline 6 Submission [REP7-029];
- Chapter 5: Parish Councils of Assington, Bures St Mary, Leavenheath, Little Cornard, Polstead and Stoke by Nayland Additional Supporting Information and Responses to Deadline 6 Submissions [REP7-035]; and
- Chapter 6: Francis Prosser Deadline 7 Comments on Submissions Received at Deadline 6 [REP7-044].

- 1.3.4 The Applicant has commented on paragraph numbers used in the individual submissions, grouping paragraphs where relevant. The submissions provided by other Interested Parties have largely been included verbatim. However, where necessary, the Applicant has paraphrased those submissions and has made other stylistic/ grammatical changes to the text. It is not considered that these changes are material to the comments provided. In the first instance, the Applicant would direct the reader to the original submission.
- 1.3.5 Generally, the Applicant has not commented on matters which an Interested Party has said it is not concerned about, has no further comments to make, where it has deferred to another Interested Party on a specific matter or where it states they will make further comments in due course.

2. Thematic Issues

2.1 Overview

2.1.1 This Chapter identifies the key issues raised by Interested Parties on a thematic basis which include:

- Management Plans;
- Socio-Economics and Community Benefits; and
- Draft Development Consent Order (DCO).

2.2 Management Plans

The Outline Written Scheme of Investigation

2.2.1 The Applicant notes that there are a limited number of comments submitted by the Councils at Deadline 7 in relation to the Management Plans. The Applicant has already responded to the points raised in Comments on the Outline Written Scheme of Investigation (OWSI) [REP7-034] at Deadline 7 in the Applicant's Response to Interested Party Comments on Management Plans [REP7-022]. The Applicant has commented on additional points in relation to the OWSI and the Register of Environmental Actions and Commitments (REAC) (document 7.5.2 (E)) in Chapter 3 of this document.

Landscape and Ecological Management Plan

2.2.2 The Applicant has also responded to SCC Comments on any other submissions received at Deadline 6 [REP7-031] in relation to the LEMP in Table 3.1 of this document and notes that SCC will provide comments on the updated LEMP [REP7-006] at Deadline 8.

Construction Traffic Management Plan

2.2.3 Responses to comments from BMSDC, ECC and SCC on the Construction Traffic Management Plan (CTMP) are provided in the Applicant's Comments of Responses on Second Written Questions question DC2.6.13 (document 8.10.3) and are not duplicated here.

Public Rights of Way Management Plan

- 2.2.4 In both the SCC response at Deadline 7 [REP7-031] and the ECC and BDC response at Deadline 7 [REP7-029], both County Councils welcome the inclusion of closure sequencing of the Public Rights of Way (PRoW) network. The County Councils note that the information provided confirms which routes will be affected in conjunction with adjacent parts of the network and confirm that the technical note provides adequate information on the phasing of network restrictions. Both councils say that assessment will be undertaken of the cumulative effect of the closure of the routes and provided at Deadline 8. The Applicant will await this feedback from the Council.

2.3 Socio-Economics and Community Benefits

- 2.3.1 This section responds to submissions made at Deadline 7 in relation to the comments received in respect to socio-economics (including skills) and community benefits.
- 2.3.2 In its Comments on any other submissions received at Deadline 6 [REP7-031], SCC maintain that the Applicant has not provided details of the likelihood of local employment opportunities on the project and the skill sets needed within its workforce and compares this to the skills available within the local labour market. In its Deadline 7 submission [REP7-029], ECC and BDC noted that the Council's remain committed to the position that an employment and skills plan detailing arrangements to promote local employment and skills development opportunities is required and the Councils would support the Secretary of State adding this as a requirement should this DCO ultimately be consented. The Applicant has responded to these matters in Table 0.5 – Socio-Economics and Other Community Matters: Employment of the Applicant's Responses to Second Written Questions [REP7-025] at Deadline 7.
- 2.3.3 The Applicant recognises that the updated National Policy Statement (NPS) states that the Secretary of State 'may' wish to include a requirement that specifies the approval of an employment and skills plan by the local authorities. The scoping assessment for the Bramford to Twinstead Reinforcement concluded that the project was unlikely to have significant socio-economics effects and it was therefore scoped out of the Environmental Impact Assessment. The baseline assessment that was presented within the Scoping Report was updated and submitted in the application for development consent as part of the Socio Economics and Tourism Report [APP-066]. This confirmed that the conclusions presented in the Scoping Report remained the same.
- 2.3.4 As previously stated in response to the Second Written Questions [REP7-025], no jobs will be created during the operation of the project, and during construction the project would not create a large number of jobs for the local area (anticipated to be in the order of 35 jobs at peak) or require a large demand of the local workforce. Given the low number of construction workers anticipated, and because no likely significant effects have been identified in relation to this matter, it is not considered that there is a need to submit an employment and skills plan specific to this project, nor does the Applicant consider that securing an Education, Skills, and Employment strategy through the DCO is required or appropriate to make the development acceptable in planning terms.
- 2.3.5 In its Deadline 7 submission [REP7-029], ECC and BDC noted that the Councils are seeking a community benefit fund, consistent with values published within the Government's Response to the Electricity Transmission Network Infrastructure Consultation (Department for Energy Security and Net Zero, 2023) which accompanied the Autumn Statement on 22 November 2023. The Councils remain of the view

that this should be provided under the umbrella of 'Community Benefits' which preferably would be secured under an agreement made under s.111 of the Local Government Act 1972.

- 2.3.6 The Applicant supports the delivery of community benefits associated with transmission infrastructure projects, and already has a number of established programmes which deliver this.
- 2.3.7 Final government guidance has not yet been published or formally adopted, and the regulatory position on community benefit is yet to be confirmed. Therefore, it would be premature to set out firm figures at this stage. Notwithstanding this, the Applicant is committed to continued engagement to develop an efficient and effective community benefits strategy.
- 2.3.8 The Applicant agrees with the view of the host authorities (and the government consultation) that community benefits should be considered outside of the planning process so as not to conflate any benefit with required mitigation, and therefore, does not need to be secured under a s.111 agreement

2.4 The Draft Development Consent Order

- 2.4.1 Suffolk County Council's Response to the Action Points arising from ISH5 and ISH6 [REP7-032] provides certain comments on Schedules 5, 6, 8 and 12 of the draft DCO (**document 3.1 (G)**). The Applicant has responded to these comments through the Applicant's Schedule of Changes to the Draft DCO (**document 8.4.2 (F)**) which has been submitted at Deadline 8. Those points are not duplicated here to avoid repetition.

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

3.1 Introduction

3.1.1 Table 3.1 below summarises the Applicant’s comments to submissions provided by SCC at Deadline 7 [REP7-031] and [REP7-032], which are not covered in the Thematic section above. The Applicant has no comments on the Cover Letter [REP7-030] and it has already responded to the points raised in Comments on the Outline Written Scheme of Investigation [REP7-034] at Deadline 7 in the Applicant’s Response to Interested Party Comments on Management Plans [REP7-022] therefore these documents are not referenced in Table 3.1.

Table 3.1 – Applicant’s Comments on the SCC Deadline 7 Submission

Ref	Matter	Point Raised	Applicant’s Comments
Response to the Action Points arising from Issue Specific Hearing (ISH) 5 and ISH6 [REP7-032]			
<i>Chapter 1: Response to the Action Points arising from ISH5</i>			
1	Review of Schedule 5, 6, 8 and 12 of the draft DCO	<p>SCC provided comments on specific access points, noting that these comments are not exhaustive of the perceived inaccuracies in Schedules 5, 6, 8 and 12 of the draft DCO.</p> <p>SCC requested that the Applicant engage with the Local Highways Authority (LHA) to resolve these issues.</p>	The Applicant has responded to these comments through the Applicant’s Schedule of Changes to the Draft DCO (document 8.4.2 (F)), which has been submitted at Deadline 8. Those points are not duplicated here to avoid repetition.
<i>Chapter 2: Response to the Action Points arising from ISH5</i>			
1.18	Action Point 4	To provide summaries in relation to the Environmental Impact Assessments as well as the Transport Assessments, based on IEMA July 2023 guidelines, regarding worst case hour and effects on the community. SCC will respond to this action point at Deadline 8.	Noted. The Applicant will await the response from SCC at Deadline 8.
1.18	Action Point 11	SCC has completed a high-level review of structures on the abnormal indivisible load (AIL) routes provided as Figure 2 of the CTMP [REP6-025]. The capacity detail has been confirmed by	The Applicant would refer to its previous response at Deadline 7 [REP7-026] where it agrees that road alignments are fluid and change over time, which is why AIL assessments are required prior to deliveries and need to be undertaken a short period before the

Ref	Matter	Point Raised	Applicant's Comments
		<p>Structural Review, an assessment would be required to change interim restriction.</p> <p>As a result, the restrictions shown in Table 1 have been applied to structures on the local road network (LRN). Of note are the C&U and STGO1 restrictions placed on a number of structures. This may prevent AIL associated with this project travelling over these structures or necessitate temporary works to accommodate them.</p> <p>It may be that with further investigation, assessment and review the capacity of these structures may be revised. SCC would encourage early discussions with the applicant to discuss processes to ensure that the AIL routes remain viable.</p>	<p>movements take place. The Applicant submitted reports assessing AIL routes at Deadline 6 [REP6-038], which demonstrate the overall viability of the proposed AIL routes sufficiently for the DCO application. Further assessments will be undertaken prior to deliveries but are required to be shortly prior to deliveries given that road layouts, structure condition and roadworks change over time and could influence final routing. These further assessments will capture any road changes since the previous reports.</p> <p>The Applicant further considers that the Special Types General Orders process is the appropriate mechanism for consultation and approval of AIL movements, as set out in Section 4.3 and 5.3 of the CTMP (document 7.6(D)).</p>

Comments on any other submissions received at Deadline 6 [REP7-031]

Draft Statement of Common Ground Local Authorities

2a	Structural repairs	surveys and	<p>SCC 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 LRN. SCC's position is that it is seeking similar measures to be included within a side agreement.</p> <p>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 LHA. This process would be repeated within three months of the end of the construction period and the Applicant would pay to the LHA that part of the reasonable costs of reinstating the highway to its former condition attributable to project traffic.</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>In response to the concerns raised by the LHA, the heads of terms for the draft Framework Highways Agreement have been updated to include (i) an obligation on the Applicant to share the condition surveys with the LHAs and then (ii) a commitment for the Applicant to consider any evidence presented to it of damage to the highway which the LHA consider is attributable to extraordinary traffic. This will provide a mechanism for the Applicant to reimburse costs outside the formal s.59 process. Ultimately it would not preclude recourse to s.59 in the usual way.</p>
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CEMP Appendix B: Register if Environmental Actions and Commitments

3a	and Outline Written Scheme of Investigation (OWSI)	and	<p>SCC notes that the REAC contains a copy and paste of the details within the OWSI, this is not needed as the information will</p>	<p>The Applicant added the further commitments relating to archaeology to the REAC (document 7.5.2 (E)) in response to the Council's request. However, in response to the Council's current</p>
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Ref	Matter	Point Raised	Applicant's Comments
Detailed Written Scheme of Investigations (DWSI),	be set out within the OWSI once approved, and the REAC should only link back to this document.	<p>SCC would advise the following for the REAC:</p> <p>1. REAC shall set out provision for the implementation of the OWSI.</p> <p>a. The draft OWSI [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.</p> <p>b. The OWSI sets out the scope of DWSI, which will detail the site-specific mitigation measures 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>	<p>request it has removed the text that is repeated in the OWSI, especially as this is now not consistent with the OWSI that was submitted at Deadline 7 [REP7-012].</p> <p>The Applicant added wording to the REAC at Deadline 4 to include the wording from Requirement 6 of the draft DCO (document 3.1 (G)), which states, <i>'No stage of the authorised development will commence until a DWSI of areas of archaeological interest relevant to that stage (if any) as identified within the OWSI or identified through evaluation work as set out in the OWSI has been submitted to and approved by the County Archaeologist.'</i></p> <p>The Applicant considers that the OWSI should be finalised during Examination to provide a securing mechanism for the future archaeological mitigation work, noting that details of such work would be provided to the Archaeological Advisors through the DWSI, which would be in accordance with the OWSI.</p>
		<p>2. REAC shall ensure that the archaeological works do not extend beyond the Order Limits and limits of deviation for the project.</p> <p>a. The extent of intrusive archaeological investigations and mitigation shall not extend beyond the Order Limits 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].</p>	<p>The Applicant has added the following wording to the REAC at Deadline 8 (document 7.5.2 (E)) in response to the Council's request: <i>'The extent of intrusive archaeological investigations and mitigation shall not extend beyond the Order Limits as shown on the Work Plans [APP-010].'</i></p>
		<p>3. REAC shall ensure that a detailed project design for the Palaeoenvironmental and geoarchaeological works for the trenchless river crossings.</p>	<p>The Applicant added wording to the REAC (document 7.5.2 (E)) at Deadline 4 to address this comment: <i>'The mitigation proposed at the River Box and the River Stour will include a programme of geoarchaeological assessment that is proportionate to the project impact and the potential significance of the deposits, with details to be determined within the DWSI. The Archaeological Contractor will produce a DWSI for areas requiring geoarchaeological mitigation. This will be submitted to the local authority advisors for comment prior to the commencement of earthworks.'</i></p>
		<p>4. REAC shall ensure the fencing off of archaeological mitigation areas.</p>	<p>The Applicant does not consider it to be practical to fence off all archaeological mitigation areas as there will be instances where the fencing obstructs the work required, for example during a</p>

Ref	Matter	Point Raised	Applicant's Comments
			watching brief. Fencing requirements will be set out in the DWSI specific to the archaeological mitigation proposed.
		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.	The OWSI sets out what the DWSI would need to include. The OWSI is secured through Requirement 6 of the draft DCO (document 3.1 (G)) and therefore text from that document does not need duplicating in the REAC (document 7.5.2 (E)).
		REAC shall ensure that Local Authority Archaeological Advisors have access to the project to monitor and sign off relevant work.	The Applicant recognises that it is standard for the Local Authority Archaeological Advisors to visit projects as part of monitor and signing off relevant archaeological work. However, this will need to be arranged through the Applicant, to ensure that the staff meet all environmental and health and safety requirements (e.g. PPE, attend briefings and inductions etc). Details of such arrangements will vary depending on the activities taking place on site and therefore the Applicant considers are best defined through the DWSI, which are approved by the Local Authority Archaeological Advisors.

8.8.11 Reports on Abnormal Indivisible Load Access for Cable Drums, Transformers and Shunt Reactors

8.8.11	Abnormal routes	Indivisible Load	SCC welcomes submission of these document as the provide a level of comfort that assessments have been undertake regarding the proposed routes. SCC 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.	<p>The Applicant would refer to its previous response at Deadline 7 [REP7-026] where it agrees that road alignments are fluid and change over time, which is why AIL assessments are required prior to deliveries and need to be undertaken a short period before the movements take place. The Applicant submitted reports assessing AIL routes at Deadline 6 [REP6-038], which demonstrate the overall viability of the proposed AIL routes sufficiently for the DCO application. Further assessments will be undertaken prior to deliveries but are required to be shortly prior to deliveries given that road layouts, structure condition and roadworks change over time and could influence final routing. These further assessments will capture any road changes since the previous reports.</p> <p>The Applicant further considers that the Special Types General Orders process is the appropriate mechanism for consultation and approval of AIL movements, as set out in Section 4.3 and 5,3 of the CTMP (document 7.6(D)).</p>
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8.8.6 Applicant's Response to Interested Party Comments on Management Plans

Ref	Matter	Point Raised	Applicant's Comments
5a	Landscape and Ecological Management Plan (LEMP)	<p>SCC welcomes that some of the comments made at Deadline 5 [REP5-036] will be reflected in the revised LEMP. However, from the Applicant's response it is expected fundamental concerns with regards to the LEMP remain unresolved.</p> <p>These include that 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).</p>	<p>Good practice measure LV02 in the Code of Construction Practice (CoCP) (document 7.5.1 (C)) states that <i>'the contractor(s) will apply the relevant protective principles set out in British Standard 5837:2012: Trees in relation to design, demolition and construction. This will be applied to those trees within the Order Limits which will be preserved through the construction phase, and to trees outside of the Order Limits where such measures do not hinder or prevent the use of the relevant working width for construction...'</i></p> <p>The Main Works Contractor will be responsible for implementing the project in accordance with BS 5837 (2012), which includes suitable tree protection measures.</p>
	Outline LEMP	<p>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.</p>	<p>The Applicant has responded to this point in the Applicant's Response to Interested Party Comments on Management Plans [REP7-022]. The Applicant is unclear what is meant by the statement that this does not appear to be compatible with the Rochdale envelope principle, as it considers that it has sufficient details available at this stage to finalise the management plan during Examination, when taking into account the later discharge of LEMP Appendix A and B through Requirement 8 and 9 of the draft DCO (document 3.1 (G)).</p>
	Hard surfacing materials (p. 11)	<p>SCC considers that hard surfacing materials should be approved by the relevant planning authority, to avoid unnecessary impacts on the 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>	<p>The Applicant updated Requirement 9 of the draft DCO at Deadline 6 to state that <i>'Unless otherwise agreed with the relevant planning authority, the reinstatement planting plan... must include a landscape plan for each cable sealing end compound where relevant to that stage, which will show landscape mounds, planting and proposed finishes for hard landscape features.'</i></p> <p>Therefore, the Councils will approve hard landscaping details as part of the discharge of this Requirement.</p> <p>As stated in ES Chapter 4: Project Description [APP-072], the Applicant is proposing stone for some of the temporary access routes. The design and finishes of the temporary access routes would be designed based on the vehicle type and numbers using them, and the Applicant does not consider that the Councils have a role (or would want the liability associated with this) in specifying the finishes associated with the temporary access routes necessary to construct the project.</p>

Ref	Matter	Point Raised	Applicant's Comments
Aftercare (9.1.4 and 9.1.5)	<p>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.</p> <p>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 biodiversity net gain areas and cable sealing end compounds, it should not be unthinkable to support the remaining planting areas for as long as is necessary to ensure success.</p>	<p>The Applicant has responded on the aftercare duration in Applicant's Response to First Written Questions [REP3-052] in EC1.3.4, EC1.3.5 and DC1.6.92, and why extending the aftercare across the whole project is considered unnecessary.</p>	
Compensation (1.3.3)	<p>SCC Considers that compensation is not the same as mitigation, although it is part of the Mitigation Hierarchy.</p>	<p>The Applicant agrees that compensation is not the same as mitigation and is part of the mitigation hierarchy. The Applicant provided a full response to comments on EN-1 policy on the mitigation hierarchy in section 6c of document 8.7.3 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-025].</p> <p>The Applicant would particularly note that whilst compensation is a component of the mitigation hierarchy, it is not treated in the same way as the other three elements of the hierarchy in planning policy terms. Paragraph 4.2.11 of EN-1 (2024) states that '<i>Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated</i>'. This sentence does not include the fourth element of the hierarchy, compensation. Similarly, unlike mitigation, compensation cannot remove a significant effect from the EIA.</p> <p>Therefore, in addition to having a different meaning and being a different stage in the hierarchy, compensation is treated differently to the other three elements of the hierarchy in both planning policy and EIA terms.</p>	

Ref	Matter	Point Raised	Applicant's Comments
5b	Applicant's response to SCC Response to Action Points from CAH1, ISH2, ISH 3 and ISH 4, received at Deadline 5	<p>For clarity, SCC's proposal is that heavy goods vehicles (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. 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>	<p>The Applicant's submissions in respect of the proposed amendments to Requirement 7 (concerning further restrictions on HGV movements) are captured in the Applicant's Response to the Schedule of the Examining Authority's recommended amendments to the Applicant's draft DCO also submitted at Deadline 8 (Document 8.10.2).</p> <p>The Applicant's position otherwise remains as set out in the Applicant's Comments on Other Submissions Received at Deadline 4 ([REP5-025], and in particular at pages 11 and 66 to 69 (inclusive).</p>

8.8.8 Transport Assessment Summary of Junction Modelling Analysis

6a	Junction Modelling Data	<p>SCC welcomes the opportunity to examine the junction modelling supplied by the Applicant. Whilst time has not allowed for an in-depth review. SCC 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>SCC 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>	<p>The Applicant notes that the junction issues summarised by SCC are caused by baseline (i.e. non-project) traffic. The Transport Assessment Summary of Junction Modelling Analysis [REP6-048] states clearly that the impact of project traffic on junction performance would be marginal and that, given peak project traffic would only be expected to be sustained for a short period around August 2025, no mitigation would be warranted specifically due to project activities.</p> <p>The Applicant remains of the view that it is not necessary or proportional to restrict the total number of construction vehicles or the arrival/ departure times of staff. However, please see the Applicant's Comments on Responses to Second Written Questions (document 8.10.3) under question DC2.6.13, which highlights further changes the Applicant has made to the CTMP to address comments on monitoring and reducing traffic through, for example, use of crew vans.</p>
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4. Applicant's Specific Comments on the Submission from Essex County Council and Braintree District Council

4.1 Introduction

4.1.1 Table 4.1 summarises the Applicant's comments to submissions provided by ECC and BDC at Deadline 7 [REP7-029], which are not covered in the Thematic section above. The Applicant has not commented on matters that ECC/BDC has said it is not concerned about, is in agreement with, has no comment on or where it has deferred to another Interested Party on a specific matter. Therefore the numbering in Table 4.1 is not consecutive.

Table 4.1 – Applicant's Comments on the ECC/BDC Deadline 7 Submission [REP7-029]

Ref	Matter	Point Raised	Applicant's Comments
Chapter 12 Deadline 6 Comments on Planning Statement			
12.2.1-2	Policies included	The Applicant has added some, but not all relevant, BDC policies including Policy SP1, Policy SP3, Policy SP7 and policy LPP52. These additions are welcome, as they are in broad terms, related to the project.	The Applicant welcomes this feedback.
12.2.4	Policy omissions	There were a number of notable omissions from The Councils' recommended list of Policies in MG1.0.14 [REP3-061]. Notable omissions include Policy SP6, LPP42 and LPP71. It is fair to say however that these policies are broad in nature and there are no specific local BDC policies to do with new overhead or underground lines. Furthermore, it is noted that many of the policy criteria is contained within the National Planning Policy Framework, to which this development has had regard. As such, including these policies would unlikely change the outcome of the Applicant's submission.	The Applicant agrees with the view that the named policies are broad in nature and are more relevant to development generating high levels of traffic, waste and emissions. The Applicant also agrees that the inclusion of these policies would not change the outcome of the assessments. The Applicant is therefore of the view that these are not omissions and that the policy consideration in the Planning Statement addresses the matters which are relevant and important.
12.2.5	Policy omissions	There were also other policy omissions (Policies SP2, LPP43 and LPP78) which were less relevant to the scheme.	The Applicant agrees that the inclusion of these policies would not change the outcome of the assessments. The Applicant is therefore of the view that these are not omissions and that the policy consideration in the Planning Statement addresses the matters which are relevant and important.

5. Applicant’s Comments on the Submission from the Parish Councils of Assington, Bures St Mary, Leavenheath, Little Cornard, Polstead and Stoke by Nayland

5.1.1 Table 5.1 summarises the Applicant’s comments to the submission provided by the Parish Councils of Assington, Bures St Mary, Leavenheath, Little Cornard, Polstead and Stoke by Nayland at Deadline 7 [REP7-035]. In some cases, where the point raised is lengthy, the Applicant has summarised the key points to keep the document concise. In some cases, the same matter is covered in different locations in the response. In such cases the Applicant has grouped these in Table 5.1 to aid the response given. This means the numbering is not consecutive in places.

Table 5.1 – Applicant’s Comments on the Parish Councils of Assington, Bures St Mary, Leavenheath, Little Cornard, Polstead and Stoke by Nayland’s Deadline 7 Submission

Ref	Matter	Point Raised	Applicant’s Comments
Additional Supporting Information and Responses to Deadline 5 Submissions [REP7-035]			
1	New technology	<p>The purpose of this note is to bring to ExA’s attention a recently developed alternative conductor technology which could entirely obviate the need for the new 400kV pylon route with its attendant disruption and environmental impact.</p> <p>The new conductor technology involves little more than replacing the existing conductors on existing pylons. The whole scheme would, we understand, continue to operate at 400kV but with system reinforcement capacity even higher than that presently proposed.</p> <p>Furthermore, we are bewildered by the absence of references to this conductor technology in the Applicant’s consideration of alternatives, since, if our understanding is correct, National Grid is a major investor in the US company that has developed this conductor technology and is bringing it to the market.</p> <p>Given the foregoing, we believe that the Applicant should be required to explain why it has failed to notify the ExA and the authorities of</p>	<p>The Applicant is continually looking at opportunities to get more capacity from the existing transmission network, including the replacement of conductors on existing pylons (reconductoring). It is to this end that the wider National Grid Group works with companies - such as TS Conductor - that the Interested Party refers to.</p> <p>Whilst technology will play an important part in shaping the transmission network of the future, these emerging conductor technologies do not alone overcome the need for a significant amount of new onshore network infrastructure to move the new clean, green and more affordable energy to the homes and businesses that need it.</p> <p>Solely replacing the conductors on the existing circuits between Bramford and Twinstead with TS Conductor or similar would not</p>

Ref	Matter	Point Raised	Applicant's Comments
2	TS Conductor	<p>this alternative as part of its application and to provide for it in its consideration of strategic options. It should now be instructed to provide a detailed evaluation of this emerging new technology as a solution to meeting the emerging demand for network reinforcement.</p> <p>This US-based company has developed an advanced alternative to the aluminium conductor steel supported on the earlier aluminium conductor steel reinforcement overhead line conductors that are in current general use. It uses a carbon fibre core fully encapsulated in a sheath of seamless aluminium.</p> <p>The company claims are that the new carbon reinforced conductors can provide at least three times the capacity of those that they replace whilst continuing to operate at the same high voltage and, importantly, without the need to reinforce the existing pylons.</p> <p>We have no knowledge of the company's capacity or plans for production of this conductor, but it would not be unreasonable to assume that sufficient conductor for the purposes of Bramford to Twinstead could be produced and delivered within 4-5 years, perhaps sooner. Since National Grid is a shareholder/investor in TSC, this would be reasonable timescale for establishing a production facility in UK if the conductor cannot be provided earlier from the US.</p>	<p>fulfil the project Need Case [APP-161], particularly the stability requirements. The reasons for this are set out in detail below.</p> <p>It is also worth noting that the Applicant has already and continues to uprate the existing transmission circuits out of East Anglia (between Norwich – Bramford – Pelham and Rayleigh) with new conductors, increasing the thermal capability.</p> <p>The Need Case [APP-161] sets out the constraints on the transmission network in East Anglia which the project is intended to resolve. The diagram at Figure 3.4 of the Need Case should be referred to.</p> <p>As described in the Need Case, due to the anticipated growth in the connection of generation in East Anglia, the system will experience both thermal (the amount of power that can be carried in each circuit) and stability (the ability for generation to remain stable during faults - a function of the number of circuits connecting the network) constraints.</p> <p>The existing East Anglia thermal export limit of 7,469MW will need to increase to greater than 15,000MW by 2031. The Applicant must cover all potential faults on the network. In such a case if the existing Bramford to Pelham and Bramford to Rayleigh circuits could carry larger capacity conductors this would become the most onerous fault. Therefore, to get the higher flows out of the network the whole of East Anglia (between Pelham, Bramford, Norwich, Necton, Walpole and Burwell) would need to provide the equivalent capacity to carry the flow in a fault scenario. Therefore, all circuits would need to be reconducted.</p> <p>In Great Britain and indeed across the world, substation equipment operating at 400kV is normally rated at 5000A or 3465MVA and constructed to that rating. Therefore, carrying more power on circuits involves more than replacing the conductors on the pylons. Additional substation capacity would be required at each substation (Pelham, Bramford, Norwich, Necton, Walpole and Burwell), so that the circuit is split into two separate connections to limit currents in the equipment below their standard 5000A continuous rating. In addition, higher flows on the East Anglia network during these faults increase line losses due to a function of the higher current. These losses will cause large voltage variations which would need to be</p>

Ref	Matter	Point Raised	Applicant's Comments
			<p>mitigated across the whole East Anglia region. This work (in addition to the new conductors) would have significant cost, programme and outage implications (See REP3-045 section 1.3 for an explanation of system outages) in excess of the proposed development.</p> <p>As set out in the Need Case, as well as a thermal export limit on the network there is also a stability limit of 5,170MW. This limit is set by the impedance of the network and is distinct from the thermal capability of the circuits. Reconductoring the existing circuits of East Anglia with TS Conductor or similar would not change the impedance of the network and would not increase the stability limit from the 5,170MW. The only way to remove this limit is to add additional circuits to the network as per the proposed reinforcement project. Without these additional circuits the system would not be compliant with the National Electricity Transmission System Security and Quality of Supply Standards (NETS SQSS).</p> <p>In summary, reconductoring the existing Bramford to Pelham and Bramford to Rayleigh circuits using TS conductor or similar would require the same conductor across the whole East Anglia region and include substantial associated substation works and voltage mitigation. This would still fail to meet the project stability needs case, compliance with the NETS SQSS and therefore cannot be considered a viable option in this case and hence has not been addressed in updated documentation before the Examining Authority. It is therefore the Applicant's position that the Need Case [APP-161], Strategic Options Report [APP-162] and Alternatives Considered [APP-017] remain valid.</p>

6. Applicant’s Comments on the Submission from Francis Prosser

Table 6.1 – Applicant’s Comments on the Submission from Francis Prosser at Deadline 7

Ref	Matter	Point Raised	Applicant’s Comments
Page 1	Document 8.5.9: Technical Note on Noise Levels at Hintlesham Woods	<p>It is my view that nightingales will be disturbed by the construction and permanent installation of pylons and lines so close to their nesting site(s). The report focuses heavily on one particular site – the (‘temporary’) pylons at RB12T – and others with the main argument being that these are 360m away and no work will be carried out at sensitive times / some work is temporary. With the distance from them being carefully considered, apparently. But they are the wrong pylons to assess / or not the only ones to be concerned about.</p> <p>This is potentially misleading and also seems like misdirection, when the plans propose other pylons with lines there for ever more. New pylon 4YL13A will be 50m from known nesting sites at the woods. Construction for this will also involve the destruction of 25m of double ancient hedgerow, even less than 50m from nightingale nests. This would also break part of the very ancient corridor connectivity that National Grid elsewhere claims to value, including suspected dormouse habitat. The other side on the adjoining drove, and meadow/paddock, a similar distance just to the north, have similar nesting value. (this area has not been surveyed at all, despite invitations) New pylon 4YL012B will be around 200m from nest sites.</p> <p>I would urge once again that all stakeholders be given the proper chance to consider undergrounding in this area. Dismissed out of hand back in 2010-12, and again in 2022, it should now be fairly and properly (re)considered, as I and many others have asserted throughout.</p> <p>As well as destroying the landscape, proposed new Pylon 4YL14A and the lines between it and other new pylons 13A and 15A running</p>	<p>The assessment within the Technical Note on Noise Levels at Hintlesham Woods [REP3-057] focuses on the works which need to take place within the bird breeding season.</p> <p>In terms of the double ancient hedgerow, the Applicant understands this to be what it has assessed as potential ancient woodland (PoAWS5), as described in Section 3.2 of the Technical Note on Ancient and Potential Woodland [REP3-046].</p> <p>The Applicant has considered other options that avoid the impacts from the temporary access route on this feature, as set out in Table 6.1 of Applicant's Comments on Other Submissions Received at Deadline 5 [REP6-045]. However, the Applicant considers that the alternatives would have greater effects on other ancient woodland sites. The Applicant has made further commitments to reduce the effect the project would have on PoAWS5 including measure EM-AB05 in the REAC (document 7.5.2 (E)), which states ‘the tree belt to the north of Hintlesham Woods (PoAWS5) will be retained other than at a 5m gap where the proposed temporary access route will cross the tree belt. Soil from the PoAWS5 will be stored separate to general soil storage so that it can be replaced at PoAWS5, where soil is suitable for reuse (for example, not contaminated).’</p> <p>The Applicant has responded to Francis Prosser’s comments in relation to undergrounding and the extent of ecological surveys in Section 4.4 of the Applicant’s Comments on Written Representation [REP3-048].</p>

Ref	Matter	Point Raised	Applicant's Comments
Page 2	Document Technical Note on and Potential Woodland	8.5.12: This document - contrary to previous claims and rationale for routing of new lines – at last recognises that the part of the eastern edge of Ramsey Wood / part of Hintlesham Little Wood is not technically ancient woodland. And the very small area taken up for a parallel line oversailing would not need to be valued as such. Locals know this and it is evidenced by old maps and other reports. This was part of my previous assertion during consultation that Option 2 - paralleling the existing line and with pylons well outside the woodland – would not be as damaging as an additional line of 4km across virgin territory and still 20m from ancient woodland edge. In fact, the creation of more high scrub could actually be of more benefit to many species, including nightingales.	The Applicant has responded to Francis Prosser's comments in relation to Option 2 in Section 4.4 of the Applicant's Comments on Written Representation [REP3-048].

References

Department for Energy Security and Net Zero (2023) Benefits for Electricity Transmission Network Infrastructure, Government Response, 22 November 2023. (Department for Energy Security and Net Zero, 2023)

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com