

BT-NG-020621-545-0139

# Bramford to Twinstead Reinforcement

**Volume 7: Other Documents**

**Document 7.3.1 (E): Statement of Common Ground Local Authorities**

**Final Issue E**

**March 2024**

**Planning Inspectorate Reference: EN020002**

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**Version History**

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<b>Date</b>	<b>Issue</b>	<b>Status</b>	<b>Description / Changes</b>
April 2023	A	Final	For DCO submission.
25 September 2023	B	Final	Updates to all sections of the Draft SoCG to reflect ongoing 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 ongoing discussions with the Consultee, for submission at Examination Deadline 6.
23 February 2024	D	Final	Updates to all sections of the Draft SoCG to reflect ongoing discussions with the Consultee, for submission at Examination Deadline 9.
11 March 2024	E	Final	Updates to the SoCG to reflect the final position of the Applicant and the Consultee, for submission at Examination Deadline 10.

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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 jointly 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, matters not agreed and those 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 meetings included the suggestion from SCC that the Host Authorities prepare and sign a joined-up SoCG. Subsequently, all Host Authorities agreed at a meeting held on the 6 April 2022 to combine the SoCG for all parties, although it was important to 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 Consultee (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 includes the signing off sheet.
- 1.3.3 There are no matters that remain under discussion between the parties (i.e. matters where agreement between the Parties has not yet been reached are subject to further negotiation between the Parties).

#### 1.3.4 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 at 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 the parties are largely in agreement. Where there are small areas of divergence, this is indicated with a Red or Amber coloured box 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 project considered, falls outside the Host Authorities 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.

## 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 and Noise Vibration and 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 December 2021 (1)	Planning/SoCG and Committed Development	Individual Host Authority (ECC) meeting to progress the SoCG and Long List of Development.				
15 December 2021 (2)	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	D	C
			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.				
<b>DCO SUBMISSION APRIL 2023</b>						

## 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 Host Authorities 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 Host Authorities 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 Host Authorities 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 Host Authorities 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				
11 October 2023	Community Benefits	Introductory meeting to start discussions on community benefit strategy				
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				

<b>15 November 2023</b>	Highways	Thematic meeting on highways				
<b>27 November 2023</b>	Planning	Call to discuss the PPA and the proposed construction working hours as set out in the dDCO.				
<b>29 November 2023</b>	Highways	Thematic meeting on highways				
<b>04 December 2023</b>	Community Benefits	Follow up meeting on the Community Benefits Strategy				
<b>5 December 2023</b>	Highways	Thematic meeting on highways				
<b>7 December 2023</b>	Planning/ SoCG	Call to discuss the SoCG and matters arising from it.				
<b>12 December 2023</b>	Landscape and Ecological Management Plan (LEMP)	Thematic LEMP progress call.				
<b>3 January 2024</b>	Highways	Thematic meeting on highways				
<b>10 January 2024</b>	Highways	Thematic meeting on highways				
<b>22 January 2024</b>	Planning/ SoCG	Call to discuss the SoCG and matters arising from it.				
<b>24 January 2024</b>	Highways	Thematic meeting on highways				
<b>15 February 2024</b>	Community Benefits	Follow up meeting on the Community Benefits Strategy				
<b>16 February 2024</b>	Planning/ SoCG	Call to discuss the SoCG and matters arising from it.				

# 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)			
<b>3.1 Regulatory and Planning Policy</b>										
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 [REP6-011] (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	

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)			
<b>3.2 Need and Alternatives</b>										
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 mainly 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	N/A	N/A	N/A	Agreed July 2021	E C C	S C C	B & M S D C	B D C



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		towards addressing the Climate 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 National Landscape (formally AONB and labelled in application documents as such): 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	

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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 Hintlesham Woods Site of Special Scientific Interest (SSSI).	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 B & M S D C B D C
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 B & M S D C B D C
<b>3.3 Approach and Method</b>							
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 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 B & M S D C B D C
3.3.3	EIA Approach and Methods	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 B & M S D C B D C
<b>3.4 Landscape and Visual</b>							

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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 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].	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
3.4.2	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	Not agreed, see line item 4.1.3 in Table 4.1.	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	Visual Mitigation for the CSE Compounds	SCC welcomes the additional commitment by the Applicant under Requirement 9 and the additional planting included at the CSE compounds Dedham Vale East, Dedham Vale West and Stour Valley East, and considers that subject to effective implementation, aftercare and	N/A	Agreed – However, SCC comment that this does however not alleviate the wider concerns with regards to extent and sufficiency of proposed	N/A	N/A	E C C	S C C	B & M S D C	B D C

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		ongoing monitoring the proposals around the CSE compounds are now acceptable. SCC would further like to clarify that by effective implementation, SCC refer to detailed landscape schemes and this is how they are interpreted the term 'landscape plan' in part 2 of Requirement 9.		mitigation and lack of compensation for residual effects, in particular, but not limited to, around Bramford substation. The revised LEMP, including revised Appendices [REP7-006] and [REP7-008] to [REP7-010] has not changed this.						
<b>3.5 Biodiversity</b>										
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 provided to the Consultee for information.	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
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



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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.	Agreed	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. This is agreed, except to the extent as set out in the 'Matters Not Agreed' section in this SoCG. In respect to ES Chapter 7, the most notable not agreed items are: <ul style="list-style-type: none"> <li>(All Host Authorities) The LEMP</li> <li>(BMSDC &amp; BDC) BNG</li> </ul>	N/A	N/A	Agreed	Agreed	E C C	S C C	B & M S D C	B D C
3.5.6	Veteran Tree (T378)	The Applicant has included a new commitment, EM-G13 in the Register of Environmental Actions and Commitments (REAC) ( <b>document 7.5.2 (F)</b> ), following agreement with BMSDC. The REAC, is secured via Requirement 4 of the dDCO.	N/A	N/A	Agreed	N/A	E C C	S C C	B & M S D C	B D C
3.5.7	BNG	The BNG calculation uses the Defra 3.1 metric which is	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M	B D C

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		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 ( <b>document 7.3.2 (F)</b> ).								S D C	
3.5.8	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	
<b>3.6 Historic Environment</b>											
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 anticipated to identified built heritage assets, with no works occurring to their fabric.	Agreed in their written response to the Statutory Consultation via the comments of EPS.	Agreed	Agreed in their written response to the Statutory Consultation via the comments of EPS.	Agreed in their written response to the Statutory Consultation via the comments of EPS.	E C C	S C C	B & M S D C	B D C	
3.6.3	ES Chapter 8: Historic Environment	The Consultee has considered the submission version of ES Chapter 8: Historic Environment and agree with the assessment conclusions.	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C	
3.6.4	Cultural Heritage Assets	The Consultee is satisfied with the content of the Technical Note on	N/A	Agreed	Agreed	N/A	E C	S C	B & M	B D	

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	Associated with Famous Artists and Writers	Cultural Associations [REP5-028] and agrees with the assessment conclusions.					C	C	S D C	C	
<b>3.7 Water Environment</b>											
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	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C	
<b>3.8 Traffic and Transport</b>											
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	
3.8.2	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	
3.8.3	Technical Note on Public Right of Way Closure Sequencing [REP6-049]	The Consultee welcomes the inclusion of closure sequencing contained in the Technical Note on Public Right of Way Closure Sequencing [REP6-049].	Agreed	Agreed	N/A	N/A	E C C	S C C	B M S D C	B D C	

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3.8.4	PRoW Management Plan (PRoWMP)	Subject to a limited number of further revisions which was updated at Deadline 8, the Consultee agrees with the content of the PRoWMP [REP3-056].	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B M S D C	B D C
3.8.5	Road Signage	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 is the most appropriate securing mechanism for approval of signage not authorised through the Permit Scheme.	Agreed	Agreed. SCC also comment that as long as it is clear that there will be various consenting regimes - permits for temporary signs on A frames, licences for signs attached to Local Highway Authority (LHA) infrastructure and s278 / MWL if new posts are required.	N/A	N/A	E C C	S C C	B M S D C	B D C
3.8.6	Feasibility of All routes	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 [REP6-038]. The Applicant hopes that this information will provide some reassurance that routes are feasible and appropriate for the project.  The AIL application submitted prior to vehicle movements made by the	Agreed	Agreed	N/A	N/A	E C C	S C C	B M S D C	B D C

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		Main Works Contractor will address structures affected, street furniture and any third-party land impacts and programming and operational arrangements to accommodate the movements with minimal impact on the network.									
3.8.7	Street furniture	A further good practice measure has been added to the CoCP. TT04 states that where construction works require the temporary or permanent relocation or removal of street furniture, the approach will be discussed with the relevant highway authority to agree the nature of proposals, timing and planned approach to reinstatement prior to works being undertaken. Where street furniture is affected by the routing of AIL vehicles, the effects on street furniture will be agreed through the STGO process. Where street furniture is affected by the construction of bellmouths, this will be discussed and agreed as part of agreements on the detailed design of the accesses specified in Requirement 11 of the DCO. Wording to reflect the above is presented in 5.7.4 of the CTMP.	Agreed	Agreed. SCC also comment that, as long as the Applicant is aware of the risks associated with structural capacity to enable AIL movements and works with the LHA to resolve these.	N/A	N/A	E C C	S C C	B M S D C	B D C	
3.8.8	Vehicle Movement	The Applicant will monitor the vehicles entering and exiting each site, including the times of access. The CTMP confirms this monitoring in paragraphs 5.4.7, 7.25, and in Table 7.1. Table 7.1 confirms that this information will be provided to the relevant	Agreed, but consider including a statement that suggests need agreement on the frequency of reporting of survey results.	Agree subject to commitment to report survey details to LHA (not on request). And support for LHA to review data - side agreement	N/A	N/A	E C C	S C C	B M S D C	B D C	

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		highway authorities and paragraph 7.3.5 confirms information will be provided on a quarterly basis.									
3.8.9	Staff modal share	Targets for staff modal share are set out in the CTMP, with targets for an average minimum occupancy of four personnel per crew van and 1.3 personnel per car. A target is also set for 70% of staff to travel to site using crew vans. Targets are set in paragraph 6.3.6 and Table 7.1 of the CTMP. Staff vehicle movements and occupancy will be monitored and shared with the relevant highway authority on a quarterly basis. This is also set out in the CTMP.	Agreed	Agreed	N/A	N/A	E C C	S C C	B M S D C	B D C	
3.8.10	Port Traffic Management Plan	SCC and ECC (LHA) agree that a Port Traffic Management Plan is not required for the project.	Agreed	Agreed	N/A	N/A	E C C	S C C	B & M S D C	B D C	
3.8.11	Structural Repairs to Highways	In response to the concerns raised by the LHA, the draft Framework Highways Agreement has been updated to include:  (i) an obligation on the Applicant to share the condition surveys with the LHA 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	Agreed	Agreed	N/A	N/A	E C C	S C C	B & M S D C	B D C	



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		extraordinary traffic. This will provide a mechanism for the Applicant to reimburse costs outside the formal s.59 process. Ultimately It would not preclude the recourse to s.59 in the usual way.									
<b>3.9 Air Quality</b>											
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	Agreed	E C C	S C C	B & M S D C	B D C	
<b>3.10 Noise and Vibration</b>											
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,	N/A	N/A	Agreed	Agreed	E C C	S C C	B & M	B D C	

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		except to the extent as set out in the 'Matters Not Agreed' section in this SoCG. In respect to ES Chapter 14, the most notable not agreed items are: <ul style="list-style-type: none"> <li>Construction working hours.</li> </ul>							S D C		
3.10.3	Noise Monitoring	Monitoring shall be undertaken as part of the Section 61 process under the Control of Pollution Act 1974. The Main Works Contractor will engage with the 'relevant planning authority' to identify construction activities that require Section 61 consent. The Main Works Contractor will seek to engage with the 'relevant planning authority' at least six weeks prior to submission of the Section 61 application to agree the format for the submission.	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C	
<b>3.11 Geology and Hydrogeology</b>											
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 Statement of Common Ground Environment Agency [REP6-019].	Agreed	N/A	Defer to BDC	Agreed	E C C	S C C	B & M S D C	B D C	
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	

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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	Agreed	E C C	S C C	B & M S D C	B D C
<b>3.12 Cumulative Effects</b>										
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
<b>3.13 Environmental Management and Mitigation</b>										
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 matters (confirmed January 2023).	E C C	S C C	B & M S D C	B 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	Agreed	Agreed	N/A	N/A	E C C	S C C	B M S D C	B D C

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		application for development consent.								
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	N/A	N/A	E C C	S C C	B M S D C	B D C
3.13.6	MWMP	The Consultee has no further comments to make on the MWMP and agree with the measures set out within.	Agreed	Agreed	N/A	N/A	E C C	S C C	B M S D C	B D C
<b>3.14 Discharge of Requirements</b>										
3.14.1	Authority Responsible for Discharging Requirements	In respect to the Discharge of Requirements, it was agreed by the Consultees that County matters would be discharged by the Counties and District matters would be discharged by the	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

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		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.									
<b>3.15 Socioeconomics</b>											
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	Not Agreed, see line item 4.9.1. in Table 4.1.	N/A	Agreed	E C C	S C C	B & M S D C	B D C	
<b>3.16 dDCO</b>											
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	
<b>3.17 Agriculture and Soils</b>											
3.17.1	Best Most Versatile (BMV) Agricultural Land	SCC Comment that ' <i>Best and Most Versatile Agricultural (BMV) Land; the Council acknowledges the limited negative upon BMV land so long as appropriate soil handling techniques are guaranteed.</i> '	Agreed	Agreed	Agreed	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)			
3.17.2	Soil Management Plan	The Applicant has responded at Deadline 9, to the comments raised at Deadline 8 by ECC and BDC [REP8-040] in the Applicant's Comments on Other Submissions Received at Deadline 8 (document 8.11.3). As part of this, the Applicant has committed to producing a Soil Management Plan prior to construction for each stage of the authorised development. The Soil Management Plan is secured through Requirement 14 of the draft DCO (document 3.1 (H)).	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C
<b>Community Benefits</b>										
3.18.1	Community Benefits	The parties agree that Community Benefits are not a material planning consideration and should be discussed outside of the planning process. The Applicant is committed to continuing engagement with the host authorities regarding their aspirations in respect of community benefits. Outside of the DCO process, the parties will work collaboratively to develop a strategy for community benefits whilst we await government guidance on this topic for electricity transmission network infrastructure. The parties will look to develop a strategy for community benefits by decision of the application for development consent (mid September 2024).	Agreed	Agreed	Agreed	Agreed	E C C	S C C	B & M S D C	B D C



## 4. Matters Not Agreed

Table 4.1 – Matters not Agreed

SoCG ID	Matter	The Consultee Position	The Applicant Position
<b>4.1 Landscape and Visual</b>			
4.1.1	Cumulative Landscape Effects around Bramford (compensation and landscape scale restoration)	<p><b>SCC</b> and <b>BMSDC</b> 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 Bramford to Twinstead and Norwich to Tilbury, although there are numerous other projects also in the vicinity.</p>	<p>The Applicant has undertaken an inter-project cumulative effects assessment, as presented in ES Chapter 15: Cumulative Effects Assessment [<b>APP-083</b>]. This concludes that there is the potential for significant landscape and visual effects immediately around Bramford Substation from the combination of the Bramford to Twinstead Reinforcement with a number of other proposed developments in the area during the operational phase of the project.</p> <p>The Applicant has provided detailed responses to the request for a landscape and ecology masterplan as compensation for this effect in Section 2.2 of the Applicant's Comments on Other Submissions Received at Deadline 6 [<b>REP7-026</b>] and 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 [<b>REP3-049</b>].</p> <p>In summary, the Applicant strongly disagrees that off-site mitigation is required to make the project acceptable in planning terms. 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 in other areas, including the Dedham Vale National Landscape (formerly known as AONB) and the Stour Valley which will experience significant beneficial effects through the removal of the 132kV overhead line, the removal of a section of 400kV overhead line and undergrounding the proposed 400kV line.</p> <p>With regard to the Norwich to Tilbury project, the design is still evolving, with statutory consultation yet to be undertaken. Following this, the design would be updated in response to comments raised during the consultation and the environmental impact assessment (including cumulative effects). As a result, both</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
			<p>the design and any potential mitigation measures to reduce the effects of that project may change and the effects predicted now, may or may not occur. No application has yet been submitted or consented. In this context it would not be possible or reasonable for the Bramford to Twinstead Reinforcement 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. It is unreasonable to expect the Applicant to provide compensation in the form of landscape scale restoration for the numerous projects expected by SCC and BMSDC in the area, the majority of which are being put forward by other developers and which are in the various development stages such that any predicted effects could change or may not occur.</p>
4.1.2	Adequacy of Landscape and Visual Mitigation and Compensation	<p>The <b>Host Authorities</b> do not consider that the current proposals for landscape and visual mitigation are adequate, and that a strategic landscape restoration scheme for the project is required to fully mitigate and to compensate for the adverse effects on the landscape and the communities affected by the project.</p> <p>In addition, specific comments from <b>BMSDC</b> on landscape and visual impacts include:</p> <ul style="list-style-type: none"> <li>• Landscape and visual impacts between Stour Valley East and Dedham Vale West CSE compounds;</li> <li>• Belstead Brook (Gipping Valley);</li> <li>• Landscape and visual effects at the River Brett; and</li> <li>• Historic parkland restoration at Hintlesham.</li> </ul> <p><b>SCC</b> consider that there remain fundamental disagreements, for example with regards to transparent quantification of vegetation losses, which can be understood in layman’s terms; the significance of an accumulation of effects that individually would be non-significant; the level of mitigation considered appropriate; the approach to landscape compensation and restoration (list may not be exhaustive) [<b>REP1-045</b>].</p>	<p>National Policy Statement (NPS) EN-1 (January 2024), like its predecessor (2011, the primary policy upon which the decision will be made) recognises that virtually all large infrastructure projects will have adverse landscape and visual effects.</p> <p>The landscape and visual assessment has identified a small number of receptors that would experience residual significant adverse effects, namely in parts of Burstall and to the north of Hintlesham where there would be a new overhead line. Although, the Applicant has proposed planting at these locations, it is noted that this would not completely mitigate the effects to the receptors (and indeed any quantity of planting will not fully mitigate the effect of the additional pylons in the landscape). The assessment has also identified a large number of receptors that would benefit from the project, including receptors in the Dedham Vale National Landscape and the Stour Valley.</p> <p>The Applicant maintains the view that the Bramford to Twinstead Reinforcement is a well mitigated project, both in terms of rationalisation of existing infrastructure, undergrounding of the proposed infrastructure in the most highly valued landscapes (Dedham Vale National Landscape and the Stour Valley), by the use of trenchless construction practises at key landscape features and reinstatement and mitigation planting, and will result in long-term landscape and visual benefits in these locations. The project has also committed to a 10% Biodiversity Net Gain which will complement landscape and visual reinstatement and mitigation</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
		<p><b>ECC, BDC and BMSDC</b> consider there is need for further mitigation and/or compensation at the CSE compounds (except SCC, see 3.4.4).</p>	<p>planting. As such, the benefits of the project will significantly and demonstrably outweigh the harm identified.</p> <p>In this context, the project performs very well in landscape and visual terms, providing 29km of transmission infrastructure with very limited landscape and visual significant adverse effects and also delivering beneficial effects. The Applicant does not consider there to be a need to include further planting to compensate for the limited effects of the project, which in any case, would not benefit the receptors adversely affected.</p> <p>The Environmental Statement is fully compliant with the EIA Regulations; it clearly sets out measures incorporated to avoid, prevent, reduce and, if possible, offset likely significant effects. In this context, the Applicant does not consider that any further compensation is required and is of the view that the project complies with policies on the mitigation hierarchy as presented in revised NPS EN-1 (January 2024) (though, the application will be determined in accordance with the extant 2011 NPS).</p> <p>The Applicant has provided further details in response to this matter in Table 2.1 (ref 5.8, pages 47 to 49) of the Applicant's Comments on Other Submissions Received at Deadline 4 [<b>REP5-025</b>]. The Applicant also responded to these issues in Section 2.3 of the Applicant's Comments on Other Submissions Received at Deadline 6 [<b>REP7-026</b>].</p>
4.1.3	Viewpoint Assessment	<p>Whilst the Viewpoint Assessment was originally agreed prior to the submission of the application for Development Consent, following the submission of the application for Development Consent, <b>BDC</b> requested additional viewpoints and photomontages for assessment.</p>	<p>The Applicant responded to the request for additional viewpoints and photomontages in the Applicant's Comments on Other Submissions Received at Deadline 4 [<b>REP5-025</b>]. The assessment presented in ES Chapter 6: Landscape and Visual [<b>APP-074</b>], does not rely on the photomontages, which are for illustrative purposes only to support readers of the assessment. The assessment is based on representative (not every) viewpoints on a PRoW. The Applicant maintains that the additional viewpoint locations/photomontages proposed by BDC would not change the assessment or mitigation presented in ES Chapter 6: Landscape and Visual [<b>APP-074</b>].</p>
4.2 Redundant 132kV Overhead Line			

SoCG ID	Matter	The Consultee Position	The Applicant Position
4.2.1	Removal of Overhead Line	<p><b>ECC and BDC</b> 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. <b>ECC and BDC</b> consider this removal should be part of the project.</p>	<p>The Applicant agrees that there would be further 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 its infrastructure. 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. The removal of this line is not required to make the project acceptable in planning terms as there are already long-term landscape and visual benefit in this area as a result of the project (from removal of existing overhead lines and undergrounding of the proposed transmission line).</p>
<b>4.3 Environmental Management and Mitigation</b>			
4.3.1	Construction Lighting	<p>All <b>Host Authorities</b> consider that Section 6.4 (Lighting) of the updated CEMP [REP6-021] is very limited and does not include sufficient details which cover the final lighting design scheme following the appointment of a Main Works Contractor. The <b>ECC and BDC</b> request a Requirement in respect to the control of lighting during construction, based on site specific details. Whereas, <b>SCC</b> would prefer a whole project Requirement, as per the Requirement in the East Anglia THREE Offshore Wind Farm Order 2017 which offered a general approach to lighting across the project.</p>	<p>Any lighting used during construction would be temporary and required to safety perform a required task where natural lighting conditions are not suitable. The CEMP [REP6-021] identifies typical lighting methods and levels that a Main Works Contractor would utilise to safely undertake the works.</p> <p>The CEMP states that 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. This is considered sufficient controls on the temporary lighting levels that are necessary to safely construct the project. As lighting will be used temporarily and as a safety requirement, further details and a requirement is not deemed to be appropriate.</p>
4.3.2	Permanent Lighting	<p><b>BDC</b> would also seek a generic lighting requirement for any permanent lighting.</p> <p><b>SCC</b> requests details of the finalised lighting proposals, type of luminaire used, i.e., directional, hooded, lux levels and suggested that round CSE compounds lux plans and lighting design strategies for permanent lighting are required.</p>	<p>There is no permanent lighting proposed at the CSE compounds. The GSP substation (in Braintree District / Essex) has security lighting (sensor based) which already has a grant of planning permission through the Town and Country Planning regime.</p>
<b>4.4 Traffic and Transport</b>			

SoCG ID	Matter	The Consultee Position	The Applicant Position
4.4.1	Unique identifier for construction vehicles	The LHAs ( <b>SCC and ECC</b> ) consider that there should be unique identifiers on the windscreens of construction vehicles so local people know the vehicles are associated with the project.	<p>The Applicant does not consider this to be needed or practical as construction would involve multiple deliveries and contractors, hire vehicles, crane companies etc. To facilitate this, either vehicles must be sent the notices/ identifiers in advance or come to a location to collect an identifier which adds to vehicle numbers on the network and makes construction less efficient. From experience, the Applicant has found this difficult to implement in practice for this type of development and does not consider it to be necessary.</p> <p>This type of identifier is much easier for developments such as quarries, where you have vehicles making numerous return journeys to a single site over a long period of time. It is much more challenging where different vehicles travel from a number of different starting points to a number of different locations over a temporary construction period.</p>
4.4.2	Revised forecasts	<b>ECC</b> consider that there should be the submission of revised vehicle movement forecasts and worker numbers following appointment of the Main Works Contractor.	The construction programme will be provided to the Host Authorities as per Requirement 3 of the DCO. However, the Applicant does not consider the submission of revised forecasts in this respect proportional or necessary.
4.4.3	Heavy goods vehicle (HGV) movements	The LHAs ( <b>SCC and ECC</b> ) consider that there should be restrictions on HGV movements on certain routes.	The Applicant considers that as the construction routes are secured in the CTMP, there is no need to state further restrictions on where HGV movements cannot go. Given that the traffic levels are not substantial, the Applicant disagrees that limiting HGV movements on particular routes or overall is necessary.
4.4.4	Hour of Greatest Change	<b>ECC</b> indicated that no assessment of the hour of greatest change has been undertaken, which is considered by ECC to be important for this project because the traffic impacts of the development are particularly felt during the arrival and departure periods for staff vehicles, where there may be a proportionally large increase in vehicle movements on some relatively quiet rural settings.	The Applicant has commented on this issue in its Response to the December Hearing Action Points [ <b>REP6-041</b> ] (see reference AP4 in Table 4.1) and has no further comments to make on the matter.
4.4.5	Assumptions within the Transport Assessment /ES	<p><b>ECC</b> have concerns regarding the assumptions within the Transport Assessment and is 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"> <li>• Total staff numbers.</li> </ul>	<p>The Applicant's position remains as set out at sections 2.8.2 – 2.8.14 of the Applicant's Comments on Other Submissions Received at Deadline 6 [<b>REP7-026</b>].</p> <p>The Applicant does not consider it necessary or proportionate to restrict staff numbers, vehicle numbers or shift patterns; and</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
		<ul style="list-style-type: none"> <li>• Peak construction vehicle numbers</li> <li>• Staff shifts patterns and as a result the assessment hour</li> </ul> <p>There are no mechanisms in place that guarantee these HGV numbers or shift patterns, which could result in increased impacts on the highway network during the peak hour. This brings significant risk to the conclusions of the assessment.</p> <p>The assessed peak hours are not agreed as the assessment assesses an hour of reduced development impact as per ECC submissions.</p>	<p>consider that all could decrease the efficiency of the construction programme without a good rationale for doing so.</p>
4.4.6	Securing traffic numbers per access for the construction period	<p><b>ECC and SCC</b> 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 the construction period.</p> <p>Whilst traffic numbers assessed 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 is it necessary to secure such fine details of construction which have been used at this stage to assess and avoid significant effects.</p> <p>The Applicant notes that National Policy Statement EN-1 (2011) (paragraph 5.13.11) states that requirements may be attached to a consent to control numbers of HGV movements <i>‘where there is likely to be substantial HGV traffic’</i> (this is also reflected in paragraph 5.14.14 of National Policy Statement EN-1 designated in January 2024). There will not be substantial HGV traffic generated by the project (see the Transport Assessment [APP-061]). The Councils have also requested that all traffic should be controlled. The Councils’ request goes beyond even that considered for developments generating substantial traffic. Notwithstanding whether the requirement is necessary, it would also be impractical and unreasonably burdensome on a long linear project to control where vehicles may enter the project from a large number of different access points on a daily basis.</p>



SoCG ID	Matter	The Consultee Position	The Applicant Position
			The Applicant therefore disagrees that there is a need to secure traffic numbers in the CTMP.
4.4.7	Bellmouth and junction Design for Accesses and Visibility Splays	<p><b>SCC and ECC</b> are of the view that detailed designs should be presented at the application stage for all accesses. SCC and ECC remain concerned that without consideration of site-specific details such as geometry, road width, usage, vegetation, traffic speeds the bellmouth design in isolation does not provide a design solution.</p> <p>In respect to the Temporary Access off the A131, <b>ECC</b> consider that evidence has not been submitted that the proposed access arrangements, including appropriate visibility, and ghost island can be accommodated within the existing road layout, including provision of a Stage 1 RSA. This also needs to include required details for the haul route crossing points.</p> <p><b>SCC</b> do not consider that, in landscape terms solutions have been presented that mean at detailed design stage, it is likely that the accesses can be designed and agreed in a manner that means they are deliverable within the powers of the DCO, would not result in significant additional vegetation loss and would not result in significant safety concerns, nor that the information provided demonstrates that the access, at Rose Cottage, can be developed without significant vegetation loss.</p>	<p>The Applicant disagrees that detailed designs of accesses should be provided at Application stage. Detailed designs of infrastructure projects are not generally prepared until a development has consent as it is not necessary or efficient for them to be prepared at this stage. The electricity transmission infrastructure that forms the majority of the project is not designed to this detail, so SCC/ECC is requesting more detail on the design of temporary field accesses than for the overhead line sections and compounds. Given that the final design of the project and contractor involvement may affect the accesses, designs at this stage would be premature in addition to being unnecessary.</p> <p>The Applicant accepts that detailed designs may be necessary for projects like nuclear power stations where there will be very large number of vehicles using an access on a permanent basis. This is very different to this project, where in many cases the accesses under consideration are existing field accesses to be used on a temporary basis, sometimes with fewer vehicles using the access per day than would be expected at a single residential dwelling.</p> <p>Notwithstanding the fact that the Applicant does not consider designs necessary, the Applicant agreed with SCC and ECC to review a number of priority accesses in more detail and presented this information in:</p> <ul style="list-style-type: none"> <li>• Temporary and Permanent Access Technical Note: Suffolk County Council [REP7-027]; and</li> <li>• Temporary and Permanent Access Technical Note: Essex County Council [REP8-038].</li> </ul> <p>It is the Applicant's view that this information demonstrates that even the most challenging accesses can be developed safely, within the powers set out in the DCO and without significant vegetation loss.</p> <p>The environmental assessments, as required, focus on assessing significant effects in EIA terms. They do not seek to assess the impact of pruning every individual piece of vegetation. The Applicant has assumed a magnitude of vegetation loss at bellmouths and is of the view that vegetation loss associated with detailed access design could increase or decrease but would be temporary in nature for most accesses and would not result in any</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
			<p>change in the significance of effect of the project as a whole. In any event, any vegetation removal would be part of the submitted package to the LHA for approval before the project progresses to construction in accordance with Article 48 of the draft DCO (<b>document 3.1 (H)</b>). In addition, Requirement 8 of the draft DCO requires the approval of all vegetation removal to be agreed by the relevant planning authority prior to construction work commencing. In the context of the significant additional work completed, the Applicant is disappointed that neither authority has changed their position on this matter.</p> <p>Requirement 11 of the draft DCO [<b>REP6-004</b>] 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> <p>Requirement 11 of the draft DCO provides the LHA 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>For the A131 access H-AP20, the Applicant has submitted ghost island design information including swept path assessment for both the proposed temporary access route and for the suggested alternatives. Documents include:</p> <ul style="list-style-type: none"> <li>• Technical Note on Temporary Access Route off the A131 [<b>REP4-009</b>].</li> <li>• Temporary Access Route off the A131 Concept Design and Swept Path Assessment [<b>REP5-026</b>]</li> <li>• Swept Path Assessment for Alternative Temporary Access Routes off the A131 [<b>REP6-037</b>].</li> </ul> <p>The Applicant is therefore disappointed that ECC’s position has not changed on this access and disagrees that sufficient evidence has not been provided.</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
<b>4.5 Management Plans</b>			
4.5.1	Management Plans	<p>The <b>Host Authorities</b> are of the view that a two-stage approach to the management plans should be undertaken. The Host Authorities have concerns in respect to the suite of Management Plans and consider that the Management Plans should be seen as 'outline' only and there should be a subsequent mechanism for their later discharge post consent.</p>	<p>The Applicant understands that where the Councils refer to a two stage process, they are requesting a further DCO requirement to be added whereby each of the Management Plans must be re-approved (presumably with additional detail and controls) by the Councils as part of the discharge of requirements prior to construction commencing. The Applicant does not consider that a two-stage process for the Management Plans is necessary or appropriate.</p> <p>The Applicant considers that the ultimate jurisdiction of project controls should rest with the Decision Maker, the Secretary of State for Energy Security and Net Zero, for which Parliament intended in the drafting of the Planning Act 2008. The Applicant notes that paragraph 2.10.8 of EN5 states that a management plan should be developed 'at least in outline'. This means that an outline plan is the lowest acceptable level, with the words 'at least' suggesting it is preferable for a final management plan to be developed. Indeed, on the Applicant's DCO projects to date it has been the case that the Secretary of State has approved (and certified) a similar suite of primary Management Plans as part of their decision (for example see The National Grid (Hinkley Point C Connection Project) Order 2016 and The National Grid (Richborough Connection Project) Development Consent Order 2017 and (yet to be decided, proposed) Yorkshire Green draft DCO.</p> <p>The Applicant acknowledges that there are some details that cannot be provided at this stage, for example where they require detailed design or the results of pre-construction surveys. In these instances, there are existing mechanisms in the draft DCO to allow the submission and approval of such details or secondary consenting requirements. The Applicant also acknowledges that things may change prior to completion of the project (either to the receiving environment or the design and construction methodology for the project) which may necessitate updates to the Management Plans. Mechanisms for responding to this are included within the Management Plans themselves and Requirement 4 of the draft DCO, subject to approval by the Councils (to the extent they will not give rise to any materially new or materially different environmental effects).</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
4.5.2	Adequacy of Management Plans	<p>The <b>Host Authorities</b> are of the view that the Management Plans require substantial revision, due to insufficient detail. Key issues are identified below (<b>which are not contained in separate line items</b>, to avoid duplication):</p> <p><b>CTMP</b>  <b>ECC and BDC</b> welcome the additional commitments and changes that have been made to the CTMP and the PRow Management Plan.</p> <p><b>Key Issues (not exhaustive):</b></p> <ul style="list-style-type: none"> <li>• <b>SCC:</b> Survey staff arrival and departure times;</li> <li>• <b>SCC:</b> Survey of HGV numbers;</li> <li>• <b>SCC/ECC:</b> Commit to a review of impacts if the shift patterns and arrival/departure times assumptions in the Transport Assessment are not similar to those assessed.</li> <li>• <b>SCC/ECC</b> would like vehicle numbers to be limited and action taken if those limits are exceeded.</li> </ul> <p><b>LEMP and Appendices</b>  SCC do not agree with the documents provided at deadline 7 being considered even as the Outline LEMP, as there remain serious concerns, The key issues are considered to be:</p> <ul style="list-style-type: none"> <li>• <b>SCC</b> request further info on Protective fencing;</li> <li>• <b>SCC</b> are of the view that there are too many unknown factors;</li> <li>• <b>ECC/BDC</b> seek clarity needed between Environmental Gain and Biodiversity Net Gain;</li> <li>• <b>ECC/BDC/BMSDC</b> Protected Lanes;</li> <li>• <b>ECC/BDC</b> Extent of vegetation removal and recording;</li> <li>• <b>ECC/BDC/BMSDC</b> Further requirements identified in respect to Natural Regeneration.</li> <li>• <b>SCC/BMSDC</b> Insufficient aftercare provisions, including insufficient control for relevant planning</li> </ul>	<p>The Applicant's view is that the issue is not that the Management Plans have insufficient detail, but that there is a disagreement over what should or should not be included within Management Plans. It is not proportionate or necessary for all details of a development project and its construction to be controlled by management plans approved by the Councils. However, this is particularly unnecessary for NSIPs, where the fundamental guiding principle of the Planning Act 2008 regime is to streamline both the process of securing development consent and the actual delivery of the NSIP itself.</p> <p>The Applicant holds the electricity transmission licence in England and is an experienced developer of large linear projects and already subject to a framework of legislation and licence obligations that control its operations. This includes a licence duty to deliver transmission infrastructure in an economic and efficient manner with regard to preserving amenity. The Applicant is therefore unable to accept further controls or restrictions that ultimately result in costs for energy consumers or delays delivering the project that are not evidence-based (for example a policy requirement or outcome of the Environmental Impact Assessment (EIA) process).</p> <p>The Management Plans provide the framework and parameters within which the Applicant would deliver the project including managing the potential environmental effects from construction activities. The measures within the Management Plans centre around best practice and industry standards. The Management Plans also provide the securing mechanisms for the embedded measures, good practice measures and the additional mitigation identified during the EIA process. The purpose of the Management Plans is to provide the Main Works Contractor with details of the desired outcomes of the project and to identify the controls required to avoid and reduce significant effects, as reported in the EIA. Therefore, the Management Plans are based on desired outcomes, to ensure the stated objectives of the plan are met and not necessarily a prescriptive methodology that would constrain the contractor in fulfilling these outcomes or indeed further betterment. The Applicant does not consider that the purpose of the Management Plans is to confirm every 'final detail' relating to the construction of the project, as this would unnecessarily stifle flexibility and innovation for the Main Works Contractor to construct</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
		<p>authority to ensure landscape and ecology mitigation goals are met (see separate item below).</p> <p><b>CEMP, CoCP and REAC Key Issues:</b></p> <ul style="list-style-type: none"> <li>• <b>SCC</b> (Landscape) considers that there is fragmentation of information across control documents.</li> <li>• All <b>Host Authorities</b> have concerns in respect to the temporary construction compounds and the sufficiency of their control;</li> <li>• <b>BDC/ECC/BMSD</b> More consideration should be given to a standalone public notification, communications and complaints procedure in respect to the CEMP;</li> <li>• <b>ECC/ BDC</b> A process should be brought in to ensure that those accesses that require wheel washing are identified, with appropriate facilities and management being put into place in the interest of keeping mud/detritus off the highway network in the interest of vehicle safety and amenity, common with all construction sites.</li> </ul>	<p>this important NSIP. The Applicant, therefore, considers the Management Plans to be fit for purpose in terms of controlling the likely significant effects identified in the EIA.</p> <p>The approach taken and level of detail provided in the Management Plans is comparable to that approved by the Secretary of State on other development consent orders for electric lines (the National Grid (Hinkley Point C Connection Project) Order 2016 (Hinkley Connection Order) and the National Grid (Richborough Connection Project) Order 2017 (Richborough Order)).</p> <p>Where some details cannot be provided at this stage (for example where they require the outcome of pre-construction surveys or detailed design) and the Applicant understands that it is appropriate to do so, there are existing mechanisms built into the DCO which allow for the later submission of such details. The Management Plans also have provision for secondary permits and consents that will be required at detailed design stage and provide further controls, for example Flood Risk Activity Permits, Ordinary Water Consents, Protected Species Licences and Section 61 Consent under the Control of Pollution Act 1974.</p> <p>The Management Plans are listed in sub-paragraph (2) of Requirement 4(1) of the draft DCO (document 3.1 (H)) which states: <i>'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.'</i></p> <p>The Applicant has worked closely with the Councils over many years and has also made substantial changes to the Management Plans in response to feedback received (both prior to application and during examination) in order to secure additional mitigation and detail.</p> <p>The Applicant has endeavoured to review and respond to all revisions proposed by the Councils, explaining the rationale for incorporating amendments, or rejecting them where they cannot be accepted.</p>

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			<p>The Applicant's Response to Interested Party Comments on Management Plans [REP7-022] covers submissions that have been received from other Interested Parties on the Management Plans and how these have been addressed within the Management Plans or the reasons why the Applicant does not consider it to be appropriate to include the changes.</p> <p>The Applicant has provided further responses on comments on the CTMP in its response to question DC2.6.13 in the Applicant's Comments of Responses to Second Written Questions [REP8-033] and has updated the CTMP further at Deadline 8 [REP8-018] to aim to further reduce the areas of disagreement.</p> <p>The Applicant has provided its overall response on each of the management plans in 'Applicant's Comments on Host Authorities Deadline 8 Letter' [REP9-064].</p>
4.5.3	Aftercare	<p><b>SCC/ BMSDC</b> are of the view that the aftercare period for some elements of the mitigative planting is inadequate, as over recent years changeable and unreliable weather patterns have made the establishment of any new planting much more difficult in Suffolk, and experience has shown that longer time frames (than the standard five years) are likely to be required to deliver the goals for reinstatement and mitigation (in this context, it should be considered that if, then Biodiversity will be diminished by the same percentage. If the aim is to deliver 10% BNG, this gain would disappear, if 10% of the reinstated planting was to fail. The risk of this occurring is greater, when limiting aftercare to five years).</p> <p><b>SCC/BMSDC</b> are of the view that there is a lack of control afforded to the relevant local authorities in the process of aftercare, for mitigation and Biodiversity Net Gain, control which the Councils consider necessary to secure the delivery of the agreed landscape and ecological mitigation goals.</p>	<p>The Applicant considers that the project strikes the correct balance with regard to the duration of the aftercare period, having thought very carefully about an appropriate aftercare strategy at each location based on the specific needs of the local environment, and the desired outcome, rather than applying a standard blanket duration across the project.</p> <p>The approach taken also needs to take account of land rights considerations. Generally, the Applicant does not acquire the freehold of land (with the exception of the non-linear sites) - instead it acquires rights from existing landowners who continue to own and manage their land (mainly for agricultural purposes). Therefore, the impact on landowners of any planting and subsequent obligations and restrictions must be considered. Where the Applicant has sought compulsory acquisition powers, the Applicant must demonstrate that there is a compelling case in the public interest for those powers. In this particular context considerations therefore included the constraints on landowners by virtue of the rights sought.</p> <p>The durations of aftercare are noted in submissions including 'Applicant's Comments on Host Authorities Deadline 8 Letter' [REP9-064].</p>



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			<p>The purpose of the proposed reinstatement planting is to replace what is removed, in order to maintain the existing baseline. As planting will establish within the stated aftercare timeframes, there is no justification for the Applicant to seek to agree long term management with a landowner, where that landowner would ordinarily be entitled to manage existing planting on their land as they consider appropriate. Management of replacement or mitigation planting following the five-year period is not considered directly related to the project or necessary on the basis that the planting required would have been delivered and its establishment secured, which is the purpose of the replacement planting.</p> <p>A five-year maintenance period for this purpose is standard on most planning permissions and the Applicant's previous DCOs. The Applicant maintains that five-years maintenance at these locations would not affect the Biodiversity Net Gain that would be delivered.</p> <p>The Applicant's view is that it is not necessary for control to be afforded to the Councils with respect to the establishment and monitoring of aftercare, for mitigation and Biodiversity Net Gain. The Applicant is a responsible developer who regularly undertakes construction projects of this nature nationally and is experienced in satisfying planning requirements and its obligations under its transmission licence. However, the Applicant notes the concerns of the Councils and has, therefore, added additional commitments to the CoCP and the REAC at Deadline 9 (document 7.5.1 (D) and document 7.5.2 (F) respectively) in this respect:</p> <ul style="list-style-type: none"> <li>• 'LV04: A representative from the relevant planning authority will be present at the final inspection of reinstatement and mitigation planting prior to handover to the landowner, unless agreed otherwise with the relevant planning authority. Where applicable, remedial measures will be agreed between the Applicant and relevant planning authority during the site visit in accordance with the Development Consent Order.'; and</li> <li>• 'LV05: The results of baseline vegetation surveys and post-construction vegetation surveys (aftercare monitoring) will be provided to the relevant planning authority.'</li> </ul>

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<b>4.6 Historic Environment</b>			
4.6.1	Archaeology, Trial Trenching and the Outline Written Scheme of Investigation (OWSI)	<p><b>SCC</b> (Archaeology) have issues with the amended OWSI [REP7-013] and cannot approve the document until serious amendments have been made, for detailed comments on the OWSI please see documents: a. [REP7-034] Comments on the Outline Written Scheme of Investigation [REP7-033] Section 8 of Answers to ExA's Further Written Questions c. [REP8-041] Comments on the Applicant's response to the OWSI amendments.</p> <p><b>SCC</b> (Archaeology) welcomes the amendments made to the REAC. However, SCC (Archaeology) would highlight that the OWSI [REP7-013] has not been approved, the measures proposed could be subject to change following submission of an approved DWSI.</p> <p>All <b>Host Authorities</b> consider that there are still considerable concerns regarding the amended OWSI [REP9-045], following detailed comments submitted by the Host Authorities at Deadline 7 [REP7-034]. Further comments on the OWSI have been submitted at Deadline 10.</p> <p><b>Trenched Archaeological Evaluation</b> There is currently no provision for further trenched archaeological evaluation in areas that have not been subject to trenched archaeological evaluation.</p> <p>Completion of archaeological evaluation in areas of targeted trenched evaluation to define the nature, scale and complexity of the archaeology more accurately within these areas (these have currently been removed from any further mitigation prior to the results being fully available to SCC and ECC).</p> <p>Adequate evaluation in any other areas of impact not yet assessed such as landscaping, planting, Pylon bases and working areas, temporary access roads or compounds and any other areas where topsoil stripping would be required.</p>	<p>The Applicant has reviewed the comments from the Host Authorities. The Applicant's Response to Interested Party Comments on Management Plans [REP7-022] includes the Applicant's response to comments received on the OWSI. The Applicant has responded to each of these points. Of note the OWSI has been updated at Deadline 9 (<b>document 7.10 (D)</b>) to confirm that the Detailed WSI will include the following:</p> <ul style="list-style-type: none"> <li>• A palaeoenvironmental sampling strategy proportional to the scale of likely impact, informed by consultation with the regional Historic England Science Advisor;</li> <li>• Provision for radiocarbon (C-14) dating for the top and bottom of peat sequences if present and affected by the project;</li> <li>• Provision for optically stimulated luminescence dating if needed for discovery of organic remains;</li> <li>• Liaison with groundwater specialists for advice in determining the potential impact on organic remains within waterlogged deposits; and</li> <li>• Consultation with the regional Historic England Science Advisor regarding potential impacts of hydrology, the palaeoenvironment and other sensitive buried deposits affected by hydrological change.</li> </ul> <p>Updates have been made to the OWSI as a direct result of the feedback received from the Councils. The Applicant also notes that the OWSI (<b>document 7.10 (D)</b>) is an outline plan with the details to be provided later in the form of a Detailed Written Scheme of Investigation, in accordance with Requirement 6 of the draft DCO (<b>document 3.1 (H)</b>). The Applicant has updated the OWSI and considers that sufficient information is given regarding these matters for an outline document, leaving the details requested to be presented in the Detailed Written Scheme of Investigation.</p>

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		<p>Understanding the archaeological resource by post-determination trenched archaeological evaluation outlined above will enable the archaeological resource to be accurately quantified, this will then enable the appropriate level of archaeological mitigation to be determined, as well as provide a better understanding of how archaeology should be timetabled and costed within the scope of works to ensure there are no unexpected delays to project delivery.</p> <p><b>Post-Excavation and Archiving</b>  The timescales provide in the UPD cannot be determined until the PXA has been completed. The OWSI therefore cannot provide an accurate timescale for delivery of the Archive Report, Publication and Archiving. SCCAS will advise the addition of appropriate DCO wording to secure the implementation of the UPD time scales.</p> <p>The OWSI needs to provide more details on provision for Digital Archive deposition. The needs OWSI include a project digital management plan for the full site archive, and each DWSI will need to have individual data management plans which refers to the OWSI digital management plan.</p> <p>There will be a large amount of digital information created from this project, as a result the OWSI and resulting DWSIs should also state proposals for the deposition of the digital archive relating to this scheme with the Archaeology Data Service (ADS), or similar digital archive repository, and allowance should be made for costs incurred to ensure proper deposition.</p> <p>SCCAS Archive currently only accepts archives from Suffolk. Discussions would need to be had between the applicant and the SCCAS Archives Team whether an integrated archive could be accepted by the county store. The Suffolk archive will need to be deposited in the SCCAS County Store. If Suffolk cannot accommodate the combined Suffolk and Essex archive, then details on</p>	

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		<p>deposition location for the Essex archive will need to be provided within the OWSI.</p> <p><b>Figures</b> The OWSI can also include figures with the plotted geophysics greyscale and interpretation results and results of the trenched archaeological evaluation – trench locations and feature locations within the trench. This information will be available to the archaeological contractor to include within the OWSI.</p>	
4.6.2	Setting of Listed Buildings in the Vicinity of and Including Hintlesham Hall	<p><b>BMSDC and SCC:</b> Final details of pylon locations should be provided by National Grid’s Main Works Contractor to both the relevant local planning authorities and Historic England, for avoidance of doubt in respect of the final pylon locations. This provision is purely for the avoidance of doubt in respect of the final pylon locations; therefore, this is considered a reasonable prior notification of the Main Works Contractor’s final proposals to the relevant statutory consultees.</p>	<p>ES Chapter 8: Historic Environment <b>[APP-076]</b> supported by ES Appendix 8.2: Annex A Hintlesham Hall Assessment <b>[APP-128]</b> concluded that the project would have no significant effects on Hintlesham Hall. Despite this the assessment of the project on Hintlesham Hall which concluded no significant effects, the Applicant recognised the concerns of BMSDC and SCC and discussed the micro-siting of pylons within the Limit of Deviation at Hintlesham Hall with those parties and Historic England. A commitment was subsequently included in the REAC at Deadline 6 (EM- AB01) to restrict the LoD in the location which would cause the most harm to the setting: <i>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>Subsequently, a SoCG between the Applicant and Historic England was agreed with no matters outstanding.</p> <p>In addition, BMSDC and SCC have requested final details of the pylon locations for the avoidance of doubt. Therefore, the Applicant has further updated the commitment wording of EM-AB01 in the REAC at Deadline 9 to include notification of the final pylon positioning in response to the Councils’ request as follows:</p> <p><u><i>Within two months of completion of pylon RB8 construction, final details of the as built pylon locations immediately to the north of</i></u></p>

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			<i>Hintlesham Hall will be provided to the relevant local planning authority and Historic England.'</i>
4.6.2	Hintlesham Hall	<p><b>SCC/BMSDC</b> 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 or potential replanting of the now segmented avenue of trees that once led west from the Hall.</p>	<p>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 an enhancement as described in the Environmental Gain Report [APP-176]. The enhancement proposals balance the requirements of the host authorities to enhance the parkland features whilst recognising the needs of the landowner by limiting impacts on the current land use and local farming businesses. There is not a justified need to extend the proposals. A Final Statement of Common Ground has been signed between the Applicant and Historic England [REP7-018] regarding the effects of the project on Hintlesham Hall with no remaining matters outstanding or not agreed.</p>
<b>4.7 Construction Matters</b>			
4.7.1	Working Hours	<p>Generally, all <b>Host Authorities</b> consider the proposed working hours go beyond what would ordinarily be accepted by the Host Authorities as reasonable working hours.</p> <p><b>SCC</b> is of the opinion that the working hours should be restricted and/or phased under the DCO Requirements. Although, if the working hours proposed by the Applicant are deemed essential to deliver the project, SCC comment that (with similar comments made by B&amp;MSDC), it is essential that there are:</p> <ul style="list-style-type: none"> <li>• Effective and robust schemes of engagement with local communities during construction, and</li> <li>• Effective construction management plans that are secured through DCO requirements, and</li> <li>• 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.</li> </ul> <p><b>SCC and BMSDC</b> comment that no additional detail appears in respect of Section 2.3.2 of the CEMP which</p>	<p>The Applicant has commented on the issues raised with regards to working hours in Table 3.1 (ref 2.7b) of the Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-025] and Table 5.1 (ref CM1.5.12) of the Applicant's Comments on Other Submissions Received at Deadline 5 [REP6-045]. The Applicant has also commented on this in 'Applicant's Comments on Host Authorities Deadline 8 Letter' [REP9-064]. The Applicant disagrees that further restrictions on working hours would be necessary or proportionate.</p> <p>A Technical Note on Noise Sensitive Receptors [REP6-047] was provided at Deadline 6 to evidence properties which may experience noise using a lower noise threshold. Very few additional receptors were identified in addition to those with the standard threshold, however, the Applicant updated the CEMP at Deadline 8 to take account of those additional Noise Sensitive Receptors identified. ECC and BDC have commented that the Councils do not consider that any further receptors need to be included within the NSR table/map presented by the Applicant. The environment is rural with very few receptors to experience construction effects. The Applicant is of the opinion that as BPM has been committed to at identified noise sensitive receptors, there is not a need to restrict the working hours.</p>

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		<p>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 further. SCC and BMSDC are seeking to preserve the recreational amenity of the locality during the construction phase and therefore do not consider that a 55dB restriction during the period of one hour either side of working hours is satisfactory to alleviate the recreational amenity impact.</p>	<p>With regard to start up and close down of activities an additional commitment has been made in para 2.3.2 of the CEMP (<b>document 7.5 (E)</b>) and added to the REAC which states: <i>Construction related noise levels will not exceed 55dB at the nearest Noise Sensitive Receptor as shown on Figure 14.1: Noise Baseline in the ES Figures Part 9 (application document 6.4.9) during start-up and close down activities (as defined in Schedule 3 to the draft DCO (document 3.1)).</i></p> <p>The Applicant has undertaken an assessment on amenity in terms of socioeconomic and tourism (including recreation) receptors as part of the Cumulative Effects Assessment [<b>APP-083</b>]. This looked at the temporary in-combination effects on amenity resulting from noise, dust, traffic congestion and visual effects. The assessment demonstrates that there is likely to be some disruption to amenity during construction in terms of noise and views which would be the case of any construction site of similar developments. The good practice measures set out in the CEMP and CoCP (application documents 7.5 and 7.5.1 respectively), such as best practicable means for noise, would help to reduce the effects. Overall, it is considered that intra-project cumulative effects on amenity arising during construction would be not significant.</p>
4.7.2	HGV Deliveries	<p><b>ECC/BDC and SCC</b> comment that HGV deliveries should be restricted on Saturday afternoon, Sundays and Bank Holidays and in this context ask for further modelling to determine whether this additional restriction can come in, without prejudicing the delivery of the project and meeting the outage windows. <b>BDC</b> consider that insufficient mitigation has been provided to justify going beyond reasonable working hours, especially at weekends and bank holidays.</p>	<p>See the Applicant's Comments on Other Submissions Received at Deadline 6 [<b>REP7-026</b>], in which the Applicant has responded to the specific drafting amendments proposed in relation to Requirement 7, including in respect of the proposed further restriction on HGV movements</p>
<b>4.8 Planning Matters</b>			
4.8.1	Consideration of the Statutory Purpose of the AONB	<p><b>SCC</b> 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 [<b>REP1-032</b>] and in ES Chapter 6: Landscape and Visual [<b>APP-074</b>], there would be temporary, localised effects on the AONB during construction; however, these are not anticipated to impact on the ability of the AONB to deliver its statutory purpose.</p>



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			Adverse effects should be considered in the context of the long term significant beneficial effects from the project in terms of rationalisation of existing infrastructure, undergrounding of the proposed infrastructure in the most highly valued landscapes (Dedham Vale National Landscape and the Stour Valley), by the use of trenchless construction practises at key landscape features and through the identified reinstatement and mitigation planting, and will result in long-term landscape and visual benefits in these locations.
4.8.2	The Mitigation Hierarchy and Assessment of Effects	<p><b>SCC and BMSDC</b> 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><b>SCC</b> 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><b>SCC</b> 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.</p> <p><b>SCC's</b> position is that effects which are by themselves non-significant, can in accumulation become significant (see Natural England's written representation on Navitus Bay Offshore Wind Park Application, 2014, paragraph 6.4.3 and paragraph 6.4.34) and should still be considered in the overall planning balance.</p>	<p>See the Applicants position in 4.1.2 above.</p> <p>With regard to the mitigation hierarchy, 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. More detail on the Applicant's position on this point was provided in response to SCC's point in Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-033].</p> <p>With regard to the reporting of significant effects, the Applicant notes that the Infrastructure Planning EIA Regulations 2017 states that the purpose of an EIA is '<i>to identify, describe and assess in an appropriate manner... the direct and indirect significant effects of the proposed development</i>'. In accordance with this, the ES reports on likely significant effects, however the CoCP is designed to reduce environmental effects, not just those that are reported as a likely significant effect.</p> <p>The Applicant has also undertaken an Intra Project Cumulative Effects Assessment, which looks at the combination of non-significant effects to see whether together these would make a combined significant cumulative effect. The result of this assessment is presented in ES Chapter 15 [APP-083] and supported by ES Appendix 15.2 [APP-141]. This concludes that there are no likely significant intra-project cumulative effects during construction or operation of the project. The Applicant has set out its position in respect of the planning balance, in its Planning Statement [REP6-011].</p>
4.9 Socioeconomics			

SoCG ID	Matter	The Consultee Position	The Applicant Position
4.9.1	Socio-Economics and Other Community Matters: Employment	<p><b>SCC</b> 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><b>SCC and BMSDC</b> consider that the Applicant has not provided a thorough, evidence based, examination of the likelihood of local employment opportunities on the project <b>ECC</b> 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. <b>ECC and BDC</b> suggest the Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities.</p>	<p>The Applicant has not assumed that there will be no likely significant socio-economic effects, rather the Applicant undertook a preliminary assessment of effects at the scoping stage and presented the results in the Scoping Report to the Planning Inspectorate [APP-156]. This concluded that the project was unlikely to result in significant effects. The Scoping Opinion from the Planning Inspectorate [APP-159] agreed with the scoping conclusion and this matter was therefore not required as a standalone topic in the ES. The Applicant further updated the baseline as part of the application for development consent in the Socio Economics and Tourism Report [APP-066] which confirmed that the project was still unlikely to result in significant effects on socio-economic matters. ES Chapter 15: Cumulative Effects Assessment [APP-083] assesses the intra-project and inter-project cumulative effects on socio-economics and tourism and confirms that there would be no likely significant effects. The Applicant has therefore provided the supporting evidence to reach this conclusion.</p> <p>The Applicant has provided a workforce profile as part of the application for development consent. The data on the estimated construction worker and types of workers is set out in the Socio Economics and Tourism Report [APP-066] and are all assumed to be site based.</p> <p>No additional jobs are anticipated to be created as a result of the operational phase of the project.</p> <p>During construction, the project would not create a large number of jobs for the local area or require a large demand of the local workforce. Paragraph 4.3.22 of the Socio Economics and Tourism Report [APP-066] also states that the majority of employment activities would require trained specialists who are qualified to work on high voltage electricity lines. These will be sourced through competitive tendering, with regard to the Utilities Contracts Regulations, from the Applicant's existing pool of approved framework contractors.</p> <p>From experience of other National Grid projects, it is likely that a minimum of 10% of the construction workforce would be sourced from the local labour market. It is likely that a large proportion will already be employed by the Contractor; it is usual that the specialist staff move from one project to another.</p>

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			<p>The number of jobs supported by the project is relatively low and short-term. It is therefore not considered that a specific Employment, and Skills Plan is required for this project and would be disproportionate to the scale of the potential effect.</p> <p>Outside of the DCO process and broader than this project in isolation, National Grid is committed to investing in the jobs, skills and people required to help deliver the energy transition; the Applicant is working to fully understand the wider, regional scale of labour and skills demand in the region in order to develop more sustainable interventions in this regard.</p>
<b>The Draft DCO</b>			
4.10.1	The dDCO, Key Issues	<p>With reference to the Schedule of Changes [REP9-052] the Applicant has made several changes (at Deadlines 2, 3, 4, 5, 6, 8 and 9) in response to matters raised by the Host Authorities in their Local Impact Reports (e.g. REP1-045), responses to First and Second Written Questions, to points raised in the post-hearing submissions for ISH2 [REP4-043] and ISH5 [REP6-056], in the responses to the various iterations to the Schedule of Changes and in SCC's response to the ExA's Schedule of Changes to the draft DCO [REP8-045]. .</p> <p>There are a number of matters at a stalemate in respect to the dDCO, which at a high-level include inter alia:</p> <ul style="list-style-type: none"> <li>• The extent of “pre-commencement operations” set out in Article 2(1);</li> <li>• The 28-day deemed consent period which is used in various Articles and in Schedule 4 – the Host Authorities consider 56 days would be more appropriate (Row 37 of [REP9-074] summarises SCC's position on this issue).</li> <li>• 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. (Regarding temporary stopping up, Row 8 of [REP9-074] summarises SCC's position on this issue. Regarding traffic regulation, Row 11 of</li> </ul>	<p><b>The extent of “pre-commencement operations” set out in Article 2(1)</b></p> <p>The Applicant's position remains as set out at Table 2.1 of the Applicant's Comments on Other Submissions Received at Deadline 6 [REP7-026]. 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><b>The 28-day deemed consent period which is used in various Articles and in Schedule 4 – where the Host Authorities say that 56 days would be more appropriate.</b></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><b>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</b></p> <p>The Applicant disagrees 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. With reference to written submissions set out in [REP8-040] and [REP8-045], the Host Authorities have indicated, in response to the ExA's</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
		<p>[REP9-074] summarises SCC’s position on this issue);</p> <ul style="list-style-type: none"> <li>• The geographic extent of powers exercisable pursuant to Article 48 (felling and lopping) (Row 13 of [REP9-074] summarises SCC’s position on this issue);</li> <li>• The need for, and practical operation of, a safeguarding provision as set out in Article 53 (Row 14 of [REP9-074] summarises SCC’s position on this issue);</li> <li>• The level of detail included in the Management Plans and their approval mechanism (Requirement 4);</li> <li>• The extent of construction working hours (Requirement 7) (and in this context the definition of ‘severe weather conditions’, and the need for a further restriction in relation to HGV and AIL movements) (Row 21 of [REP9-074] summarises SCC’s position on this issue);</li> <li>• The duration of the ‘aftercare period’ for reinstatement planting (Requirement 10) – i.e. whether it is 5 years or 10/15 years (Row 24 of [REP9-074] summarises SCC’s position on this issue);</li> <li>• The scope of Requirement 11 (Highway works), (Row 25 of [REP9-074] summarises SCC’s position on this issue); and</li> <li>• The request for the inclusion of additional Requirements.</li> <li>• [REP9-074] summarises SCC’s position on its remaining concerns with the dDCO (including Row 16 – Requirement 1 (interpretation); Row 17 – Requirement 3 (stages of authorised development); Row 19 – Requirement 5 (approval and implementation of Drainage Management Plan); Row 20 – Requirement 6 (Archaeology); Row 22 – Requirement 8 (retention and removal of trees, woodlands and hedgerows); Row 28 –</li> </ul>	<p>proposed amendments to Article 12, that the Permit Schemes should not apply to the maintenance of the project. As is made clear in [REP8-032], the Applicant had understood that the Permit Schemes would apply to both the construction and maintenance of the project, subject to the qualifications set out in sub-paragraphs (2) and (3) of Article 12.</p> <p><b>The geographic extent of powers exercisable pursuant to Article 48 (felling and lopping)</b> 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 Host Authorities’ submission. 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 Host Authorities 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> <p><b>The need for, and practical operation of, a safeguarding provision as set out in Article 53</b> The Applicant’s position remains as set out at Table 2.1 of the Applicant’s Comments on Other Submissions Received at Deadline 6 [REP7-026]. The Applicant notes the further submissions made by the Host Authorities at Deadline 7 in response to the ExA’s Second Written Questions.</p> <p><b>The level of detail included in the Management Plans (Requirement 4)</b> See further details at Section 4.5.1.</p> <p><b>The extent of construction working hours (Requirement 7)</b> See further details at Section 4.7.1. With reference to written submissions set out in [REP8-040] and [REP8-045], the Host Authorities have indicated, in response to the ExA’s proposed</p>

SoCG ID	Matter	The Consultee Position	The Applicant Position
		<p>Schedule 4 (discharge of requirements); and Row 35 – article 10 (planning permission).</p> <ul style="list-style-type: none"> <li>• SCC would emphasise its concern with Requirement 5 (approval and implementation of Drainage Management Plan) which, it considers, is wrong in law and would set an unfortunate precedent for DCOs because, in the usual way with DCOs, the error might be followed by others. Put simply, the discharging authority for Requirement 5 should be the “lead local flood authority” (and not the “relevant planning authority”) because drainage issues are the statutory responsibility of the lead local flood authority and not the relevant planning authority. Moreover, the “relevant planning authority” (and not the “relevant highway authority”) should be consulted by the lead local flood authority. An amended version of the Requirement is included in Row 19 of [REP9-074]. SCC’s position on this Requirement is aligned with the position of each of the other host authorities. It is also consistent with the approach mentioned in paragraph 3.14.1 above i.e. that requirements would be discharged by the appropriate authority.</li> </ul>	<p>amendments to Requirement 7, that a specific restriction on HGV and AIL movements is required. As is made clear in [REP8-032], the Applicant disagrees in the strongest possible terms with the proposed inclusion of a further restriction of this nature, noting that such a restriction is neither proportionate nor necessary.</p> <p><b>The duration of the ‘aftercare period’ for reinstatement planting (Requirement 10) – i.e. whether it is 5 years or 10/15 years</b></p> <p>The Applicant’s position remains as set out at 7.19.1 of Table 5.1 of the Applicant’s Comments on Other Submissions Received at Deadline 6 [ REP7-026].</p> <p><b>The scope of Requirement 11 (Highway works), particularly in the context of undertaking ‘pre-commencement operations’</b></p> <p>The final detailed designs, accompanied by the results or RSA, will be submitted to the LHA pursuant to Requirement 11 of the DCO [REP8-004]. 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 subparagraphs (1) and (2) unless otherwise agreed with the relevant highway authority. The amendment to the draft DCO [REP8-004] to include provision of RSA of all works to the satisfaction of the LHA through new Requirement 11 (4) also provides assurance that the design will meet the appropriate standards to be safely operable. The Applicant considers that the information submitted on the A131 access provides sufficient evidence to demonstrate that the junction design for this can be safely accommodated within the public highway and within the Order limits.</p> <p><b>The request for the inclusion of additional Requirements</b></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 <b>Applicant</b> 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> <p><b>The definition of severe weather conditions</b></p> <p>The Applicant’s position remains as set out at Table 2.1 of the Applicant’s Comments on Other Submissions Received at Deadline 6 [REP7-026]. The Applicant provided additional</p>

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			<p>clarification within the Explanatory Memorandum submitted at Deadline 8 [REP8-006].</p> <p><b>Written scheme of decommissioning</b></p> <p>The Applicant notes the further submissions made by the Host Authorities at Deadline 7 on this point in response to the ExA's Second Written Questions and has responded to the same at Deadline 8 (see the Applicant's Comments on responses to Second Written Questions [REP8-033]). In summary, the Applicant's position remains as set out in the Applicant's Comments on Responses to First Written Questions [REP4-029], namely that Requirement 12 (Decommissioning) in Schedule 3 to the draft DCO [REP8-004] suitably addresses the particular point concerning decommissioning, and hence no further or amended Requirement is needed.</p> <p>The Applicant acknowledges the Councils' position in relation to the identity of the discharging authority for the purposes of Requirement 5 (whilst noting that this is different to the position set out in SCC's response to ExQ1 DC1.6.105 [REP3-078] where it was suggested that the discharging authority should in fact be the highway authority).</p> <p>The Applicant anticipates that the Examining Authority will make the necessary amendments to Requirement 5 in the event that it is minded to recommend the making of the DCO.</p>



# 5. Approvals

Signed



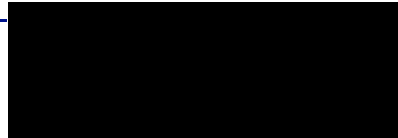
**On Behalf of** National Grid Electricity Transmission

**Name** Sally Rotherham

**Position** Lead Consent Officer

**Date** 11/03/2024

Signed



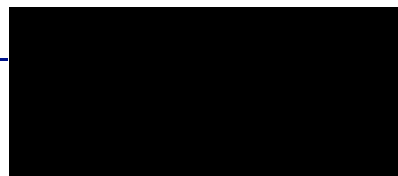
**On Behalf of** Suffolk County Council

**Name** Graham Gunby

**Position** National Infrastructure Planning Manager

**Date** 06/03/2024

Signed



**On Behalf of** Essex County Council

**Name** Mark Woodger

**Position** Principal Planning Officer (National Infrastructure)

**Date** 06/03/2024



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**Signed**



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**On Behalf of** Braintree District Council

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**Name** Mathew Wilde

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**Position** Senior Planner

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**Date** 06/03/2024

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**Signed**



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**On Behalf of** Babergh District Council

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**Name** Bron Curtis

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**Position** Principal Planning Officer

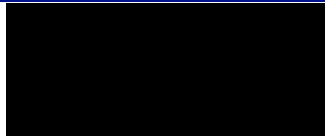
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**Date** 06/03/2024

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**Signed**



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**On Behalf of** Mid-Suffolk District Council

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**Name** Bron Curtis

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**Position** Principal Planning Officer

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**Date** 06/03/2024

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## 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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