



Meeting note

Project name	Bramford to Twinstead
File reference	EN020002
Status	Final
Author	The Planning Inspectorate
Date	22 July 2021
Meeting with	National Grid Electricity Transmission (NGET)
Venue	Microsoft teams
Meeting objectives	Project update meeting
Circulation	All attendees

Summary of key points discussed and advice given

The Applicant and The Planning Inspectorate (the Inspectorate) Case team introduced themselves and their respective roles. The Inspectorate advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

Update from project team

The project remained as previously described. It would also include the removal of 25km of existing UKPN 132kV overhead line between Burstall Bridge and Twinstead Tee, resulting in a net reduction of 7.5km of overhead line. The pylons associated with the proposed 400kV overhead line would be taller than those for the existing 132kV line. The project is required to contribute towards the government objective of increasing offshore wind power capacity to 40GW by 2030 by facilitating the connection of projects to the network. The Applicant was committed to achieving a 10% biodiversity net gain and is considering locations. The Applicant was also reviewing how to report this in the application so net gain was clearly distinct from any required mitigation relating to significant effects.

A geographical depiction of the route options was provided. The Applicant completed a review of the areas for development following the 2013 pause and recent non-statutory consultation. Responses were being reviewed alongside feedback from thematic meetings and the scoping opinion. Suggested route alignment changes and designs were being considered, with opportunities for changes for the cable sealing end compounds to further avoid the setting of the nearby Dedham Vale Area of Outstanding Natural Beauty (AONB). Two route options for the Dollops Wood area had been identified and presented at the non-statutory consultation and in the Scoping Report. Technical challenges were identified with a proposed trenchless construction technique. An open cut solution around the north of the woodland was being considered. Technical specialists, design engineers and land agents were assisting with optioneering to identify the optimal locations.

The Stour Valley project area shared the same management plan as Dedham Vale AONB, managed as a single unit under the same partnership. Proposals had been made to extend the AONB into the Stour Valley however timeframes for the decision were uncertain and no information was currently available about the boundary for the proposed extension. It was noted that on 28 September 2020 the Prime Minister announced that the Government intended to increase protected landscapes to 30% of England by 2030, but that the Stour Valley had not featured in subsequent announcements. The Applicant was using a 2016 report by Alison Farmer Associates (AFA) "Special Qualities of the Dedham Vale AONB: Evaluation of Area between Bures and Sudbury" to identify those parts of the Stour Valley which may contain those special qualities needed to achieve AONB status and taking the advice of Natural England (NE) on how the Stour Valley should be treated in the Environmental Impact Assessment, bearing in mind the potential for future AONB boundary extension. Advice from NE requests that the Stour Valley is treated as part of the setting of the Dedham Vale AONB. The Applicant was considering the effects of the project on the setting of the Dedham Vale AONB. Once an initial assessment had been undertaken this would be discussed with NE.

Thematic meetings were being held with key stakeholders to discuss the likely significant effects from the project. Various environmental surveys were being completed, including geophysical surveys for archaeology, baseline noise surveys around the proposed site of the grid supply point (GSP) substation and desk-based assessments of aerial photos. Ways of increasing the percentage area of accessible land to facilitate surveys were being considered. The Preliminary Environmental Information Report (PEIR) was being prepared along with other materials in advance of the statutory consultation, planned for November/December 2021. Application submission was planned for Autumn 2022.

Project Description

The Applicant queried the project description in the scoping opinion and transboundary assessment, which referred to it as an overhead line project. It requested an amendment to include an element of undergrounding and associated development. The Inspectorate was not able to change this, but it was noted for the future. The project description on the Inspectorate's web page was correct.

Engagement with Statutory Consultees

Quarterly meeting had been held with local planning authorities (LPA). Heads of terms and draft planning and performance agreements (PPA) had been issued. The proposal was for one agreement to cover the pre-examination and examination stages, and a second agreement for the post consent period. Discussions were ongoing to reach an understanding and agreement regarding costs. The process for accessing land had begun, and the Applicant proposed to use s172 of the Housing and Planning Act 2016 if required for access (not s53 of the PA2008). The draft Statement of Community Consultation (SoCC) was being discussed with the host LPA.

The Applicant was in discussions with NE relating to ecological survey methodology and scope. NE agreed a district licence approach for the great crested newt. A joint meeting with NE and the Royal Society for the Protection of Birds (RSPB) was held to discuss the Hintlesham Woods Site of Special Scientific Interest (SSSI). A site visit was planned during the summer to discuss methods through this area. The Applicant was working to design protected species surveys where required, informed by existing habitat surveys

completed for the previous application prior to the 2013 pause. This approach has been discussed with NE and the Applicant is awaiting its feedback on the scope of protected species' surveys whilst continuing with the ecological surveys that are already underway this year. It was preparing a technical note on dormice. This would set out the reasons for using existing survey data for the purposes of the assessment to justify presumed presence and to identify mitigation requirements, with further surveys completed once the DCO had been granted. It was awaiting NE's view on this approach. Ghost licences, or potential agreement with conditions were being discussed. Bat verification surveys had been completed, and a full phase 1 habitat assessment would be undertaken. Any identified changes to habitats would prompt further survey. Where no changes to habitat were identified an assumption of species presence (dormouse), and significant effect, was being taken.

The Applicant had also held meetings with the Environment Agency (EA), Historic England (HE) and Dedham Vale AONB Partnership. The Applicant was in discussion with the EA about a number of matters including the methodology for crossings of the River Box and River Stour (at this stage proposed to be open cut and trenchless respectively), as well as the climate change allowances to be used in the design and flood risk assessment of the Proposed Development. The focus of discussions with HE was about impact to the setting of the Grade I listed Hintlesham Hall and the Applicant intended to prepare specific mitigation proposals following a site visit. The Applicant held meetings in relation to landscape and ecology matters with the Dedham Vale AONB Partnership and was engaging with them about ways in which biodiversity net gain activity could be targeted to Dedham Vale AONB.

Scoping

The scoping report was submitted on 10 May 2021 and scoping opinion was issued on 18 June 2021. The Applicant intended to embed design measures and standard good practice construction methods, as set out in the outline code of construction practice. The assessment would focus on likely significant effects. The DCO would contain all elements of the project, including overhead and underground lines, cable sealing end compounds, the GSP substation, the removal of the 132kV line and Biodiversity net gain. Potential securing mechanisms for mitigation would be kept up to date through the Environmental Impact Assessment (EIA) process. Draft outline construction and environmental management plans, and an outline written scheme of investigation for archaeological works would form part of the application document. More detailed versions would then be produced, and the Applicant would discuss the level of detail required by LPAs.

Decommissioning (reference 2.3.7)

The Applicant was considering a written scheme of decommissioning, how to set out a realistic scenario for decommissioning, and the lifespan of different components in the PEIR and ES. The Applicant suggested addressing decommissioning in the project description and only undertaking an assessment where likely significant effects were identified. The Inspectorate acknowledged this could be subject to change, and advised sufficient detail was required to assess the likely effects of the described decommissioning. The ES should also explain any sensitivity in the findings.

Flexibility (reference 2.2.11 – 2.3.13)

The Inspectorate highlighted Advice Note 9 regarding the Rochdale Envelope, to ensure the ES assessments used the maximum parameters for a worst case scenario of adverse

effects to retain flexibility. The Applicant intended a proportionate assessment focusing on likely significant effects in accordance with the EIA Regs. It clarified references to noise levels from conductor bundles and pylon fittings would be quantified as not significant, rather than not audible and that was the basis for proposing to scope out operational noise from the EIA. The Inspectorate advised this should be clearly set out in the ES as the basis for not assessing, with any evidence of agreement with relevant stakeholders.

Landscape character areas (4.1.5)

The Applicant acknowledged the comments and would explain its approach to the assessment and overarching conclusions in the ES. A combined assessment of impacts would be presented in the ES, including conclusions on the likely significant effects at county level. The Applicant was discussing the methodology with the LPAs.

Proposed Extension to the AONB (4.1.3)

This was being considered and sensitivity testing for a worst case scenario had been requested in the scoping opinion. The Applicant was engaging with NE regarding its approach and would seek to capture any agreement in a draft Statement of Common Ground (SOCG). The Applicant noted the difficulties of undertaking sensitivity testing for any potential future designation at this stage without having a boundary (which is the responsibility of Natural England to define following detailed assessment). The Applicant's aim was to agree that the assessment would treat the area identified in the AFA report as being within the setting of the AONB on the basis of their shared landscape characteristics. It was noted that there was potential for additional or reduced areas to be included in any potential future designation extension, however the AFA report provides an independent review of the special qualities which could qualify for AONB designation, the use of AFA recommendations for the Suffolk Coast AONB extension gave confidence that the risk was lower.

Water quality (4.4.1)

There would be a commitment to specify crossing techniques for identified water course crossings in the ES, and evidence that parameters had been assessed. Exact locations and methods for crossing the River Stour would be based on an assumed method within the ES. This will allow flexibility for future technology to be used if it would not result in any new or different significant effects. The Applicant intended to clarify what had been assessed. The Inspectorate noted that it must be clear in the ES what parameters the assessment had been based on, and that these represented the worst case scenario in terms of identifying likely significant effects.

Mineral safeguarding areas (4.5.8 and 4.10.14 – 4.10.15)

LPA responses recognised that the Proposed Development passes through mineral safeguarding areas. The impacts to mineral safeguarding areas would be assessed in the EIA, although the Applicant did not propose to undertake a full economic viability assessment as this was not considered proportionate to the likely impact. The Applicant would seek to agree findings from its assessment and its proposed approach with consultees including the LPAs. It would explain the scope of assessment, agreed position and effects in the ES. The Inspectorate advised the Applicant to be sighted on local plans mineral safeguarding areas, and policy criteria. The Planning Statement should explain the approach towards any local plan policies related to mineral safeguarding and provide a rationale for any exemption from local plan policy in this regard.

Soils (4.6.1)

The Applicant intended to have processes in place for the management of internal operations work and impacts on the environment. It would need to demonstrate those measures as sufficient to mitigate potential effects.

Tourism and economy (4.10.4 – 4.10.5)

The Applicant would be updating the socio-economic baseline, to draw on wider conclusions for any cumulative effects. The Applicant had reviewed the additional data sources referenced by the LPAs in comments on the scoping report and confirmed that this is the same data as used by the Applicant and therefore no changes had been identified regarding the position on significant effects. Monitoring of some baseline data, such as hotel use, was ongoing due to the impact of the pandemic on 2020 data. The Applicant was liaising with the LPAs on the approach to gathering baseline data.

Local economy (4.10.6)

The Applicant was aiming to develop data to support the scoping out of this topic. It expected a low impact due to the nature of the project and highlighted the differences between this and larger schemes.

Overall approach to health (4.11.4 – 4.11.5)

The Applicant intended to include additional baseline information for health and socioeconomic aspects within relevant topics of the cumulative assessment. This would include information about health centres and health status, in the context of the Proposed Development being unlikely to generate increased use of facilities due to its nature.

The Applicant had some historic data regarding use of public rights of way (PROW) and would request data on navigational use of the River Stour from the EA. The Applicant noted that health impacts were considered short term and limited during the construction phase of the Proposed Development. The Inspectorate advised to set out baseline data, areas of assessment and where effects were considered temporary (including duration); the ES must set out a description of any likely significant effects.

Cumulative effects (4.14.13)

The Applicant would scope back in NSIPs within 50km to enable consideration of cumulative traffic, socio economic and tourism impacts. A 10km study area should not be used arbitrarily, the zone of influence (ZOI) used in the assessment of cumulative effects should be based on an understanding of impacts pathways. The Applicant noted that once the Zone of Theoretical Visibility (ZTV) and Affected Road Network (ARN) were defined, this would enable a better understanding of the ZOI.

Update from PINs

The Inspectorate advised a team was being set up to progress Project Speed. This would not affect the pre-application service and there were no changes in personnel within the project team.

AOB

It was agreed the next meeting would be arranged after the completion of the statutory consultation, due later in 2021.