

BT-NG-020621-545-0226

Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.5.10: Applicant's Comments on Submissions Received at Deadline 2

Final Issue A
October 2023

Planning Inspectorate Reference: EN020002

The Infrastructure Planning (Examination Procedure) Rules 2010) Regulation 8(1)(k)

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1. Introduction

1.1 Purpose of the Document

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on the other submissions from Interested Parties received at Deadline 2 in response to an application for development consent for the Bramford to Twinstead Reinforcement (the project). This document should be read alongside the suite of other documents submitted to the Examining Authority for Deadline 3, such as the Applicant's responses to Local Impact Report documents (**documents 8.5.3.1, 8.5.3.2 and 8.3.3.3**), the Applicant's comments on Written Representations (**document 8.5.2**) and the Applicant's Responses to First Written Questions (**document 8.5.4**).
- 1.1.2 The other responses received are as follows:
- Suffolk County Council - Responses to comments on Relevant Representations [**REP2-013**];
 - Suffolk County Council - Comments on the Applicant's draft itinerary for an Accompanied Site Inspection (ASI) (refers only to the Responses to comments on Relevant Representations submission document) [**REP2-012**];
 - Suffolk County Council - Comments on any other submissions received at Deadline 1 (refers only to the Responses to comments on Relevant Representations submission document) [**REP2-014**];
 - Braintree District Council and Essex County Council - Comments on any other submissions received at Deadline 1 [**REP2-009**];
 - Babergh and Mid Suffolk District Councils - Comments on any other submissions received at Deadline 1 [**REP2-008**];
 - Layham Parish Council - Responses to comments on Relevant Representations [**REP2-016**]; and
 - Alan Hall - Responses to comments on Relevant Representations [**REP2-041**].
- 1.1.3 It should be noted that the responses received from Layham Parish Council [**REP2-016**] and Alan Hall [**REP2-041**], are addressed in the Applicant's Comments on Written Representations (**document 8.5.2**).

1.2 Project Overview

- 1.2.1 An application for development consent was submitted to the Planning Inspectorate on the 27 April 2023 to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The project would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km comprising of overhead

lines, underground cables and a grid supply point (GSP) substation. It also includes the removal of 25km of the existing distribution network, 2km of the existing transmission network and various ancillary works.

1.2.2 The application for development consent was accepted for Examination on the 23 May 2023.

1.2.3 A full description of the project can be found in Environmental Statement (ES) Chapter 4: Project Description [APP-072].

1.3 Structure of the Report

1.3.1 Table 1.1 sets out the structure of the report. The Applicant has responded to paragraph numbers found in the individual responses, grouping paragraphs where relevant.

Table 1.1 – Structure of the Report

Chapter	Chapter Heading	Content
1	Introduction	This Chapter identifies the other responses received at Deadline 2, the project overview and the structure of the report.
2	Applicant's Comments on the Submission from Suffolk County Council (SCC)	This Chapter outlines the Applicant's comments on the SCC comments on the Deadline 1 submission and Response to Comments on Relevant Representations (RR) [REP2-013] submitted at Deadline 2.
3	Applicant's Comments on the Submission from Babergh and Mid-Suffolk District Councils (BMSDC).	This Chapter outlines the Applicant's comments on the BMSDC comments on the Deadline 1 submission and Response to Comments on RR [REP2-008]; submitted at Deadline 2.
3	Applicant's Comments on the Submission from Essex County Council (ECC) and Braintree District Council (BDC)	This Chapter outlines the Applicant's comments on the ECC comments on the Deadline 1 submission and Response to Comments on RR [REP2-009] submitted at Deadline 2.

2. Applicant's Comments on the Submission From SCC

2.1 Introduction

- 2.1.1 Table 2.1 summarises the Applicant's comments on the SCC Comments on Deadline 1 Submission and Response to Comments on RRs [REP2-013] submitted at Deadline 2. The Applicant has not commented on matters that SCC has said it is not concerned about.

Table 2.1 – Applicant's Comments on the SCC Deadline 2 Submission [REP2-013]

Ref	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
1.1 to 1.4	Unaccompanied Site Inspections [EV-019] and [EV-020]	SCC provided comments on the unaccompanied site inspections	The Applicant has no comments on this matter.
1.1 to 1.3	Comments on the Applicant's Written Summary of Oral Representations to Issue Specific Hearing 1 [REP1-024]	SCC provided comments on parking restrictions, speed limits and securement of traffic matters.	The Applicant has responded to these points in Chapter 9 and Annexes D to F in the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
1.4 to 1.7	Comments on Document 8.3.9: Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034]	The Applicant's response to AP19 includes a new Appendix D Example of Proposed Updated Register of Environmental Actions and Commitments (REAC): The purpose of the REAC is to record the various commitments made by the Applicant during the iterative development of the project design and during the examination process.	The Applicant has submitted an updated version of the REAC at Deadline 3 (document 7.5.2 (B)).
1.8	Comments on Document 8.3.9: Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034]	Regarding AP12, SCC feels that it is unclear from the Applicant's response if the routes to the access points are fixed at this stage or still remain to be determined once a contractor is appointed.	In response to the feedback received from the Councils, the Applicant has added the proposed construction routes to Appendix A of the Construction Environmental Management Plan (CTMP) (document 7.6 (B)). The CTMP is secured through requirement 4 of the draft Development Consent Order (dDCO) (document 3.1 (C)).

Ref	Matter	Point Raised	Applicant's Comments																		
1.9	Comments on Document 8.3.9: Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034]	Concerning AP16, the Applicant has stated that 2021 Public Right of Way (PRoW) surveys were undertaken over a ten hour period but not stipulating the exact hours of surveys. Details would be required of exact days surveyed and times of the day to gather a full assessment for impact.	<p>The 2021 survey data summarised was collected across a 10-hour period from 8am till 6pm. The survey dates differed depending on the route, as follows:</p> <table><tr><th>PRoW</th><th>Weekday survey date (2021)</th><th>Weekend survey date (2021)</th></tr><tr><td>Millfield Wood (W-432/033/0)</td><td>Wednesday 8 September</td><td>Sunday 17 October</td></tr><tr><td>River Box (W-432/020/0)</td><td>Tuesday 7 September</td><td>Sunday 12 September</td></tr><tr><td>Stour Valley (W-171/001/0)</td><td>Thursday 2 September</td><td>Sunday 26 September</td></tr><tr><td>Moat Lane (PROW 93_8 / PROW 93_7)</td><td>Wednesday 1 September</td><td>Saturday 11 September</td></tr><tr><td>Crossroads (PROW 58_11 / PROW 58_30)</td><td>Friday 3 September</td><td>Saturday 25 September</td></tr></table>	PRoW	Weekday survey date (2021)	Weekend survey date (2021)	Millfield Wood (W-432/033/0)	Wednesday 8 September	Sunday 17 October	River Box (W-432/020/0)	Tuesday 7 September	Sunday 12 September	Stour Valley (W-171/001/0)	Thursday 2 September	Sunday 26 September	Moat Lane (PROW 93_8 / PROW 93_7)	Wednesday 1 September	Saturday 11 September	Crossroads (PROW 58_11 / PROW 58_30)	Friday 3 September	Saturday 25 September
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1.10	Comments on Document 8.3.9: Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034]	Concerning AP17, SCC is the Highway Authority covering PRoW. Natural England oversee Open Access Land, SCC recommend the Applicant checks Natural England guidance and mapping for Open Access land.	The Applicant confirmed that the assessment of impacts on PRoW were reported in the ES Chapter 12: Traffic and Transport [APP-080], however it would come back to the ExA in writing on whether other routes had been considered. This is addressed in AP17 of the Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034].																		
1.11	Comments on Document 8.3.9: Applicant's Response to Issue Specific Hearing 1 Action Points [REP1-034]	Concerning AP18, SCC has been advised by the Applicant that there will be a separate PRoW Management plan and this is welcomed.	The Applicant has submitted the PRoW Management Plan (document 8.5.8) at Deadline 3, which is secured through Requirement 4 of the draft DCO (document 3.1 (C)). .																		
2.1.2 Comments on the Applicant's Draft Itinerary for an ASI [REP1-026]																					
2,1 to 2.2	Accompanied site visit	SCC is satisfied with the Applicant's suggestions for a proposed ASI.	The Applicant has no comments on this matter.																		

Ref	Matter	Point Raised	Applicant's Comments
2.1.3 Responses to Comments on Relevant Representations [REP1-025]			
Table 1	Planting and Climate Change	The use of plants of local provenance is a widely accepted practice. However, given the anticipated changes in climate it is increasingly important that the planting stock is climate change adaptable. SCC therefore considers this approach insufficient.	Paragraph 8.2.2 of the Landscape and Ecological Management Plan (LEMP) (document 7.8(B)) has been updated to include consideration of climate change resilience when selecting planting stock.
Table 1	Landscape impacts (general)	While SCC acknowledges that most nationally significant energy infrastructure projects will have effects on the landscape, the Council considers that the full mitigation hierarchy should be applied, which should include compensation measures as set out the draft NPS EN-1 (2023). Across the project as a whole the proposals for additional mitigation, and for landscape softening in particular, are neither considered sufficient, nor sufficiently secure to provide the required enhancements.	The Applicant has responded to these points in 6.12 to 6.16 in the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
Table 1	Landscaping around Bramford Substation	<p>SCC acknowledges that in some locations, such as around Bramford substation, the significant adverse residual effects are not capable of direct mitigation. However, this should not preclude the Applicant from taking a comprehensive approach to design of planting and landscaping in this area to compensate for the adverse impacts in accordance with the mitigation hierarchy.</p> <p>The Applicant highlights the level of uncertainty regarding the relationship between this project and the Norwich to Tilbury Project in the Bramford Area. However, SCC considers that, given these are projects promoted by the same Applicant, an integrated design approach should be sought as far as possible, rather than dismissed.</p>	The Applicant has responded to these points in 6.109 to 6.111 and 12.71 in the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
Table 1	Vegetation Removal around Bramford Substation	SCC acknowledges that the LEMP Appendix A: Vegetation Retention and Removal Plan details, on Sheet 01, the vegetation removal proposed along Bullen Lane, to allow safe vehicular access to Bramford Substation.	The Applicant has shown all vegetation that would be affected during construction of the Proposed Alignment on LEMP Appendix A: Vegetation Retention and Removal Plan [APP-183]. In any case, Requirement 8 of the dDCO says that no stage of the authorised development may commence until, for that stage, a plan showing the trees, groups of trees,

Ref	Matter	Point Raised	Applicant's Comments
		<p>SCC would welcome clarification, on whether any further works to trees and hedgerows would be required along Bullen Lane, outside the DCO limits and the scope of the arboricultural and hedgerow surveys.</p> <p>SCC welcomes clarification whether H-AB-18 refers only to the hedge on the southern side of Bullen Lane (Bullen Lane is vegetated on both sides in this location).</p> <p>Further, SCC would welcome clarification, why there is no entry for T1 and G1001- G1004 (neither in the original, nor in the updated Arboriculture Impact Assessment [APP-067 /REP1-011], and very limited information for hedgerow H-AB-018 in the Important Hedgerows Assessment [APP-115].</p>	<p>woodlands and hedgerows to be retained and/or removed during that stage has been submitted to and approved by the relevant planning authority. Therefore, the Council will get a further chance to review plans if these require amendments prior to construction.</p> <p>The Applicant does not intend to undertake any works to the trees or hedges along Bullen Lane outside the Order Limits.</p> <p>The Applicant confirms that H-AB-18 refers to the hedgerow along the southern edge of Bullen Lane. The hedgerow along the northern edge of Bullen Lane is outside the Order Limits.</p> <p>With regards to the entries within Appendix A of the Arboricultural Impact Assessment [APP-067/REP1-011], paragraph 1.1.1 in Appendix A states '<i>the reference codes are non-continuous because C and U category features are not presented</i>'. It is for this reason that features such as T1 and G1001-G1004 have no entry.</p>
Table 1	CSE Compound Embedded Measures, and Placemaking	<p>Generally, SCC considers that further mitigation is required at the cable sealing end (CSE) compounds (in particular for the Dedham Vale West CSE compound), and that for the Stour Valley West CSE compound clarification is required, why the embedded measure EM-G06 is not reflected in the year 15 photomontage G-07. The Council considers that the outline proposals should be fully agreed prior to consent being granted.</p>	<p>Embedded planting has been included at each CSE compound. These are listed in the REAC (document 7.5.2 (B)) as EM-D01 (Dedham Vale East), EM-F01 (Dedham Vale West), EM-G03 (Stour Valley East) and EM-G06 (Stour Valley West). Locations of the embedded planting are shown on Sheet 28 at ES Appendix B: Vegetation Reinstatement Plan (document 7.8.2 (B)).</p> <p>In terms of EM-G06, based on the average growth rates set out in Table 3.1 in Photomontages [PDA-001] it is assumed that the native trees would achieve heights up to 7.7m after 15 years. However, views from the south would remain open due to the location of the underground cables. The effects of this are shown in photomontage 34B at G-07 presented in ES Appendix 3 Photomontages [APP-065]. Mitigation planting is shown to the left of the CSE compound as per the plans granted it is seen against existing trees and hard to distinguish between the modelled vegetation and existing.</p> <p>The Applicant has submitted ES Appendix B Vegetation Reinstatement Plan (document 7.8.2 (B)) into Examination so that these proposals can be agreed prior to development consent being granted. This is then supported by Requirement 9 (reinstatement planting plan) of the dDCO</p>

Ref	Matter	Point Raised	Applicant's Comments
			(document 3.1 (C)) which prevents any stage of the authorised development from being brought into operational use until a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated during that stage has been submitted to and approved by the 'relevant planning authority'. Therefore, 'the relevant planning authorities' would have further input to the planting proposals, should these change, prior to implementation.
Table 1	Cumulative Impacts with Norwich to Tilbury	SCC agrees with the views of Essex Place Services, instructed by BMSDC, that the proposed mitigation and landscape softening is insufficient to address the adverse cumulative effects of the scheme and has commented on this issue in the Local Impact Report (LIR).	The Applicant has responded to these points in 6.114 to 6.117 in the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
Table 1	Hintlesham Woods Routeing	SCC acknowledges that the routeing option at Hintlesham Woods would avoid potentially unacceptable impacts upon the Hintlesham Woods Site of Special Scientific Interest (SSSI). However, the route to the west of Hintlesham Woods, which is now the preferred route, impacts upon the setting of a number of listed buildings.	ES Chapter 8: Historic Environment [APP-076] presents the effects on listed buildings and concludes that there would be no significant effects on the setting of the listed buildings during operation of the project.
Table 1	Hintlesham Hall Micrositing & Mitigation	The Council's position remains that the option proposed in relation to Hintlesham Hall and its setting is unsatisfactory. Further that should the project go ahead in its current form, consideration should be given to additional mitigation and compensation planting to offset the cumulative harm on the local landscape, recreational receptors and the setting of the hall. Overarching draft NPS for Energy (EN-1) (March 2023) identifies in paragraph 4.15 that ' <i>In considering any proposed development [...] the Secretary of State should take into account [...] measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy</i> '.	The Applicant has responded to these points in 6.135 to 6.138 and also Chapter 16 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
Table 1	Surface Water During Construction	SCC is the Lead Local Flood Authority for Suffolk and has responsibility for managing the risk of flooding from surface water, ground water and ordinary watercourses. SCC consider that there is a need for a construction	Chapter 9 of the Construction Environmental Management Plan (CEMP) (document 7.5(B)) outlines the measures proposed to reduce surface water run off during construction across the whole project. The Applicant does not consider it

Ref	Matter	Point Raised	Applicant's Comments
		surface water management plan for the proposed CSE and temporary construction compounds.	necessary to produce a separate surface water management plan for specific locations of temporary works.
Table 1	Monitoring and Enforcement of Construction Traffic	SCC is not yet content that the CTMP secure effective monitoring or enforcement to ensure that the traffic movements identified in the assessment are not exceeded.	The Applicant has responded to these points in 12.4, 12.93 to 12.94 and 12.140 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
Table 1	Environmental Impact of Temporary Accesses	SCC remains to be convinced that the plans and data provided by the Applicant are of sufficient detail to ensure that all impacts of constructing temporary and permanent accesses have been identified. The significant length of the site has resulted in plans of insufficiently detailed scale which do not enable 'drilling' down into details for the individual accesses. Experience from delivery of other NSIPs has shown that omissions at the DCO stage can result in compromises having to be made at a later date.	The Applicant has responded to this point in 12.99 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
Table 1	Working hours	The Council remains very concerned regarding the proposed working hours, particularly that work could occur on Sunday and Bank Holidays.	The Applicant has responded to these points in Chapter 11 and 14.44 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage. Further information can also be found in Justification for Construction Working Hours (document 8.5.11) submitted at Deadline 3.
Table 1	Socio Economic and Tourism	SCC disagrees with the scoping out of economic development, skills and tourism. SCC would welcome the opportunity to collaborate on a skills strategy for the Applicant's projects to secure benefits for the region. SCC remains concerned by the omission of consideration for the visitor economy. The Council also has concerns that another large-scale energy project will impact on the available labour force and, if external workers are brought into the county, will only have a short-term positive impact on the tourism economy. Whilst accommodation providers may benefit during the construction period, SCC would want to see a balanced thriving tourism economy afterwards.	The Applicant has responded to these points in Chapter 12 (specifically 15.1 and 15.80 with tourism economy/visitors in 15.7 and 15.59 to 15.61) of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.

Ref	Matter	Point Raised	Applicant's Comments
Table 1	Community benefits	SCC ready to engage with the Applicant regarding aspirations for community benefits, in tandem with the other host authorities, and welcomes the Applicant's commitments to continue discussions. For the avoidance of doubt, SCC agrees with the Applicant that these discussions would be outside of the DCO process whilst we await the outcome of the Government's consultation.	The Applicant is committed to continuing discussions with the Councils and other key stakeholders regarding their aspirations in respect of community benefits. As noted in 15.9 the Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1), these discussions lie outside of the DCO process whilst the Applicant awaits the outcome of the Government's consultation on community benefits.
Table 1	Draft Development Consent Order (draft DCO)	SCC have provided various comments on the draft DCO, with reference to substantially similar points raised in the Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report.	The Applicant has responded to these points in Chapter 14 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
Table 2	SCC concerns with other provisions in the draft DCO	SCC have provided various comments on the draft DCO, with reference to substantially similar points raised in the Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report.	The Applicant has responded to these points in Chapter 14 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
Appendix 1 - NIPA Insights II, Preparing a Flexibility Toolkit, Project A, continuation project: Consultation and Engagement in the DCO Process (2019)			
Appendix 1	National Infrastructure Planning Association (NIPA) Insights	SCC draw attention to this document and the case study contained therein, in respect to public engagement and providing a clear and legible DCO.	The Applicant has no comment on this matter.

3. Applicant's Comments on the Submission from BMSDC

3.1 Introduction

- 3.1.1 Table 3.1 summarises the Applicant's comments on the BMSDC Deadline 2 Response [REP2-008] Chapter 2 of the response outlines the purpose of the submission.

Table 3.1 – Applicant's Comments on the BMSDC Deadline 2 Submission [REP2-008]

Reference	Matter	Point Raised	Applicant's Comments
2 The Applicant's Draft Itinerary for an ASI [REP1-026]			
2.1 to 2.3	Accompanied Site Inspections	BMSDC provided comments on the accompanied site inspections.	The Applicant has no comments on this matter.
3 Ecology Comments on Other Submissions Received at Deadline 1			
3.1	Biodiversity net gain (BNG)	There is some uncertainty regarding BNG and Requirement 13. We have been unable to find the information referred to in the documents submitted.	Environmental Areas as identified in the Environmental Gain Report [APP-176] are areas in which enhancement planting has been identified (not mitigation). The enhancement planting shown in the Environmental Gain Report is not included within the Management Plans as it will be delivered by alternative mechanisms outside of the main construction works with the evidence provided in accordance with Requirement 13 of the draft DCO (document 3.1 (C)). Biodiversity Net Gain (BNG) is covered within the Environmental Gain Report [APP-176] and is secured via Requirement 13 (BNG) of the draft DCO (document 3.1 (C)). The Applicant considers this to provide sufficient certainty.
3.2	Hintlesham Woods	We support the RSPB's requests in their Statement of Common Ground for monitoring of impacts on Hintlesham Woods.	The Applicant has produced a Technical Note on Noise Levels at Hintlesham Woods (document 8.5.9). This sets out further details on the works proposed and a new embedded measure (EM-AB14) has been added to the REAC (document 7.5.2 (B)) at Deadline 3 which states: Percussive piling will not be used to construct the foundations of temporary pylon RB12T (607067, 243469), to reduce the maximum (peak) noise levels associated with this construction

Reference	Matter	Point Raised	Applicant's Comments
			<p>method to avoid subsequent disturbance on sensitive species at Hintlesham Woods SSSI.</p> <p>With this measure in place, and the existing commitment EM-AB09 which limits the activities that can take place in bird breeding season around Hintlesham Woods, the Applicant considers the noise disturbance to birds would be avoided and therefore, monitoring would not be required.</p>
4 Landscape Comments on Other Submissions Received at Deadline 1			
4.1 to 4.4	Unaccompanied site visit	BMSDC is clarifying which of the viewpoints were visited by the ExA on their unaccompanied site visit	The Applicant has no comments on this matter.
4.5 to 4.7 and 4.16	Undergrounding and landscape assessment	BDC position is that the role of undergrounding has not been fully explored in relation to the Rivers Brett and Belstead Brook, both of which sit within existing Special Landscape Areas, demonstrating their value at the local level. The argument for overhead lines is stated as a combination of economic and other environmental factors. The Council wishes to point out that the Applicant's statement does not state that significant landscape and visual effects will not occur in these landscapes.	The Applicant has responded to these points in Chapter 3 of the Applicant's Comments on Babergh Mid Suffolk District Council Additional Local Impact Report (document 8.5.3.3) and has no further comment to make at this stage.
4.8 to 4.9, 4.13 to 4.15	Landscape mitigation	<p>BDC's position is that 50m high pylons and overhead lines are very hard to mitigate with traditional planting due to their height and industrial nature. BDC draws ExA's attention to the Overarching NPS for Energy (EN-1) (March 2023) which identifies in para 4.15 that <i>'In considering any proposed development... the Secretary of State should take into account...its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy'</i>.</p> <p>BDC's position is that a significant landscape and visual compensation package should be drawn up by the Applicant in association with the relevant Councils and their key environmental partners, over and above the 'softening' measures already suggested, the BNG to be provided and distinct from any discussions of community benefits.</p>	The Applicant has responded to these points in 6.12 to 6.16; 6.19 to 6.20 and 6.172 to 6.178 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
4.10	Stour Valley East CSE compound	BDC welcomes the additional undergrounding in the Stour Valley. The Council retains concerns that the assessment of the Stour	The Applicant has responded to these points in Chapter 2 of the Applicant's Comments on Babergh Mid Suffolk District

Reference	Matter	Point Raised	Applicant's Comments
		Valley East CSE compound has been considered at some distance from the facility therefore does not fully consider the experience of sensitive receptors using the PRoW network close by. As a result, there are concerns that any proposed mitigation or compensation will be insufficient to offset these anticipated adverse effects. BDC would like to see further assessment carried out from the PRoW network close to the facility and provision of a demonstrably effective mitigation and/or compensation scheme.	Council Additional Local Impact Report (document 8.5.3.3) and has no further comment to make at this stage.
4.11	Cumulative effects assessment (CEA)	The Applicant identifies that during operation, the project would have a significant adverse effect on the landscape of the Ancient Plateau Claylands Landscape Character Area and acknowledges that significant cumulative landscape and visual effects would arise between the project and East Anglia THREE and Norwich to Tilbury. Further the CEA concludes that additional mitigation, such as planting, would not reduce these effects to a non-significant level, because the effects cannot be fully screened by tree planting due to the height of the pylons.'	The Applicant has no comments on this matter.
4.12	Landscape softening	The Council does not agree with the Applicant that identifying a few properties to benefit from landscape 'softening' in proximity to the proposed 400kV overhead line is sufficient for such cumulative adverse effects. Nor is it sufficient to rely on proposed BNG planting to the west of Bramford Substation to assist with filtering views.	The Applicant has responded to these points in 6.12 to 6.16; 6.19 to 6.20 and 6.172 to 6.178 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
4.17	Hintlesham Hall	Although Hintlesham Park is an undesignated heritage asset, it provides an important setting for Hintlesham Hall. The Council's position remains that the option proposed in relation to Hintlesham Hall and its setting is unsatisfactory.	The Applicant has responded to these points in 8.42 and 8.43 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
5 Heritage comments on other Submissions received at Deadline 1			
5.1	Limits of Deviation	Inconsistencies within the Applicant's submission regarding pylon height are referenced in Table 2.1 of Document 8.3.9, in which it is clarified that the maximum pylon height will be 62.23m. The Limits of Deviation (LoD) set out in the draft DCO would allow for a potential 4m increase on this height of 62.23m. However, this increase in height has the potential to cause a greater impact upon the setting of heritage assets, by increasing (or allowing for) visibility of the power lines within areas of landscape which	The Applicant has responded to these points in 6.10 to 6.11 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.

Reference	Matter	Point Raised	Applicant's Comments
		contribute highly to the significance of a heritage asset, for example. Therefore, it is highly recommended that this LoD is removed in areas where the DCO is within at least 500m of a designated heritage asset, as outlined in ES Appendix 8.1: Annex A Historic Environment Gazetteer [APP-126]. The gazetteer helpfully provides a table of all assets within 3km of the DCO, broken down into categories of 0-250m, 250m-1km and 1-3km, highlighting a number of clusters of listed buildings where the DCO will be in close proximity to heritage assets.	
5.2	Micrositing of pylons at Hintlesham Hall	Whilst not all of these will also be the location of a new pylon, cross referencing the documentation does again highlight Hintlesham Hall as a particularly sensitive area, due to the number of heritage assets, their association with the surrounding landscape and proximity to the power lines. It is strongly recommended that the LoD does therefore not apply in this area, as the relocation and increased height of pylons within the LoD may have an affect which needs to be carefully considered in relationship to the listed buildings and surrounding landscape.	The Applicant has responded to these points in 6.10 to 6.11 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
5.3	Heritage impact	<p>If it is not possible to vary the LoD in areas where the DCO is in close proximity (e.g. 500m) from a designated heritage asset, it is recommended that additional surveys are required in these areas to inform pylon placement. As the National Planning Policy Framework (NPPF) states at paragraph 200, '<i>great weight should be given to the asset's conservation</i>', and in many cases it should be considered that conservation also relates to an asset's setting, not purely its physical fabric.</p> <p>Surveys and heritage impact assessments should be used to inform pylon placement and height, with justification provided for any harmful effect on an asset's setting, as well as exploration of any potential mitigation solutions, such as the use of smaller pylons, planting or an alternate location, for example.</p>	The Applicant has responded to these points in 6.10 to 6.11 of the Applicant's Comments on Suffolk County Council and Babergh Mid Suffolk District Council Local Impact Report (document 8.5.3.1) and has no further comment to make at this stage.
5.4	Accompanied site visit	Regarding the proposed accompanied site visit, it would be beneficial if additional time was allocated to Hintlesham Hall.	The Applicant has no comments on this matter.
6 Environmental Health comments on other Submissions received at Deadline 1			
6.1	Management plans	We confirm the position set out in the draft Statement of Common Ground – Local Authorities that some items, including matters relating to the noise and vibration chapter (ES Chapter 14) and its	Initial locations where additional noise mitigation may be required have been identified in ES Chapter 14: Noise and Vibration [APP-082]. The Main Works Contractor would apply

Reference Matter	Point Raised	Applicant's Comments
	translation to the CEMP and the CoCP and CTMP remain unagreed and we would be pleased to provide further comments in due course as more information becomes available. The initial noise and vibration assessment (Chapter 14 of the ES) identifies receptors at risk of significant adverse effects and gives overview details of potential mitigation methods but these would need to be detailed on a site-specific basis in any information submitted, going forward.	for Section 61 consents, where required, under The Control of Pollution Act 1974.

4. Applicant's Comments on the Submission from ECC/BDC

4.1 Introduction

- 4.1.1 Table 4.1 summarises the Applicant's comments on the ECC/BDC Deadline 2 Response [REP2-009] Chapter 2 of the response outlines the purpose of the submission. The Applicant has no comments on this Chapter.

Table 4.1 – Applicant's Comments on the ECC/BDC Deadline 2 Submission [REP2-009]

Reference	Matter	Point Raised	Applicant's Comments
3.1.1 Comments on the Applicant's Draft Itinerary for an ASI [REP1-026]			
3.1 to 3.24	Unaccompanied Site Inspections	ECC/BDC provided comments on the unaccompanied site inspections	The Applicant has no comments on this matter.
3.1.2 Responses to Comments on Relevant Representation [REP1-025]			
4.2	Archaeological mitigation	<p>The Applicant's response does not fully address the issues raised, specifically the Outline Written Scheme of Investigation (OWSI) and the REAC. The OWSI will be directly referenced in the DCO under Requirement 6 and therefore it is paramount that it is approved early in the examination process. This will need updating in order to facilitate an appropriate response to mitigation and to address our comments and recommendations made in the LIR.</p> <p>An additional requirement within the REAC was recommended in the LIR to secure appropriate mitigation of archaeological remains and to integrate the archaeological process into the overall programme of environmental mitigation.</p>	The Applicant will be submitting an updated OWSI at an appropriate deadline to include the results of the final round of trial trenching proposed on the project. The Applicant has also updated the REAC (document 7.5.2) at Deadline 3, which includes reference to the OWSI.
4.3	Redundant 132kV overhead line	The Council's position is that this section of 132kV line should be included as part of the project, owing to the fact that the project if approved, would render it redundant, leaving a piece of unused infrastructure which is harmful to local landscape character.	The Applicant has responded to this point in lines 7.6.3 to 7.6.8 in Table 3.1 of the Applicant's Comments on Essex County Council and Braintree District Council Local Impact Report (document 8.5.3.2) and has no further comment to make at this stage.
4.4	Environmental Impact of	The Council's remain concerned about the amount of vegetation to be removed associated with the temporary access route off the A131. It is unclear however whether further coppicing would be	The Applicant has responded to this point in lines 8.5.1 in Table 4.1 of the Applicant's Comments on Essex County Council and Braintree District Council Local Impact Report (document 8.5.3.2). In any case, Requirement 8 of the dDCO says that no

Reference	Matter	Point Raised	Applicant's Comments
	Temporary Accesses	<p>required to the hedge in order to provide visibility splays for the access, given that the road is national speed limit in this section.</p> <p>It is acknowledged that the removed vegetation for the access bellmouth would be replaced at the end of the construction period, while the coppiced hedgerows are anticipated to regrow over time. These LEMP plans should however be updated should any additional removal and replacement be required as a result of visibility splays or the right-hand turn lane.</p>	<p>stage of the authorised development may commence until, for that stage, a plan showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage has been submitted to and approved by the relevant planning authority. Therefore, the Council will get a further chance to review plans if these require amendments prior to construction.</p>
4.5	Public Rights of Way (PRoW)	<p>The Council's note the Applicant commitment within Table 2.25: PRoW of their intent to not permanently stop up any PRoW and keep the temporary closure of the same down to a minimum, keeping it open with appropriate management where possible, this being within Chapter 6 of the CTMP. This also include mitigation works to preserve the use of the Hadleigh Railway Walk which although well used by cyclists and walkers but does not form part of the adopted highway network.</p>	<p>The Applicant has submitted the PRoW Management Plan (document 8.5.8) at Deadline 3.</p>
4.6	Working hours	<p>The Councils remain of the view that the proposed working hours are excessive and unreasonable for NSR's, especially owing to the anticipated 4-year construction programme. Night time working also remains a concern and requires further exploration by the Examining Authority.</p>	<p>The Applicant has responded to this point in lines 17.4.4 to 17.4.9 in Table 3.1 of the Applicant's Comments on Essex County Council and Braintree District Council Local Impact Report (document 8.5.3.2) and has no further comment to make at this stage. Further information can also be found in Justification for Construction Working Hours (document 8.5.11) submitted at Deadline 3.</p>
4.7	Socio-economics and tourism	<p>It is correct that Socio Economic impacts were Scoped out within the original assessment, along with tourism. The Councils, as well as those in Suffolk, consider this particularly disappointing given the value of employment opportunities post Covid are at an understandable high, and that tourism is a major contributor to the economic wellbeing of this rural location.</p> <p>Skills as needed here will be transferable between a large variety of projects (including Norwich to Tilbury), and the impacts cumulatively of multiple projects will be significant. By not exploring this impact and proposing methods to negate the potential harm this could have on local jobs and skills, local suppliers and the supply chain, this remains unproven.</p> <p>It is noted that on site employment would fluctuate during the build programme of the project, but without commitment to use local workforce it is considered to be a missed opportunity.</p>	<p>The Applicant has responded to this point in lines 18.4.1 to 18.4.7 in Table 3.1 of the Applicant's Comments on Essex County Council and Braintree District Council Local Impact Report (document 8.5.3.2) and has no further comment to make at this stage.</p>

Reference	Matter	Point Raised	Applicant's Comments
4.8	Community benefits	All Host Authorities are currently finalising their shared ask for community benefits to offset and mitigate the impact of this development, and to provide a lasting local legacy going forward.	The Applicant has responded to this point in Chapter 18 of the Applicant's Comments on Essex County Council and Braintree District Council Local Impact Report (document 8.5.3.2) and has no further comment to make at this stage.
	Noise and Vibration Impacts of Temporary Access	National Grid state in Table 3.3 of REP1-025 that Chapter 14 Noise and Vibration [APP-082] of the EIA includes a consideration of the noise emissions from the temporary access route off the A131. However, no specific noise emission predictions have been undertaken. BDC would like to see some noise contour plots showing the propagation of noise from the temporary access route off the A131, with an assessment of the potential effect on the surrounding noise sensitive receptors.	The Applicant has assessed the noise levels associated with the temporary access route off the A131 in the ES. The assessment has concluded that there would be no significant effects associated with this element of the temporary works. Therefore, the Applicant considers it unnecessary to provide noise contour plots for this location.
4.10	Draft Development Consent Order (draft DCO)	The Councils have set out a number of detailed comments in the joint ECC/BDC LIR [REP1-039] on the matters raised in section 3.3 on the Applicant's Comments on Relevant Representations. The Examining Authority is referred to the joint LIR in the first instance.	The Applicant has responded to each specific point raised in the LIR in the Applicant's Comments on Essex County Council and Braintree District Council Local Impact Report (document 8.5.3.2) and has no further comment to make at this stage.
4.11	Impacts on East Anglia	In relation to mitigation for overhead lines, The Council's position is that 50m high pylons and overhead lines are very hard to mitigate with traditional planting due to their height and industrial nature. BDC draws attention to the draft Overarching NPS for Energy (EN-1) (March 2023). The Councils' position is that, should the project go ahead as proposed, long-term adverse landscape and visual effects, including significant ones, will take place that cannot be mitigated through landscape planting, and that therefore a significant landscape and visual compensation package should be drawn up by the Applicant in association with the relevant Councils and their key environmental partners, which is over and above the existing measures in the application and distinct from any discussions of community benefits.	The Applicant notes that there are no new overhead lines proposed on the project within Essex County/Braintree District. ES Chapter 6: Landscape and Visual [APP-074] states that during operation, there would be long term significant beneficial effects to the Stour Valley due to the project.
4.12	Options and Routing – Section G Stour Valley	The Councils welcome the additional undergrounding proposed in the Stour Valley. However, the Councils remain concerned that the landscape and visual effects of the Stour Valley East CSE compound have not been fully considered at the local level with the assessment point (VPG2.5) some distance from the facility. The experience of sensitive receptors using the PRoW network close by does not appear to be fully considered. The Councils would like to see further assessment carried out from the PRoW	The Applicant has responded to this point in lines 7.5.5 to 7.5.9 in Table 3.1 of the Applicant's Comments on Essex County Council and Braintree District Council Local Impact Report (document 8.5.3.2). The Applicant also notes that the proposed reinforcement is underground cables, as noted in the ECC/BDC response, near St Edmunds Way and therefore is identified as having a beneficial effect on landscape during operation. ES Chapter 6: Landscape and Visual [APP-074]

Reference	Matter	Point Raised	Applicant's Comments
		<p>network closer to the facility in order to demonstrate the effectiveness of the proposed mitigation and/or compensation.</p> <p>An additional viewpoint assessment should also be considered close to the construction route, such as from St Edmund's Way, where it crosses the underground cable line, as landscape and visual effects could be substantial here during construction. Similarly, it is unclear why the photomontage (VPH07/G18 View from Rectory Lane on edge of Wickham St Paul) has been done c800m away from the GSP substation.</p> <p>There are also no appropriate landscape and visual assessments taken from the PRoW network east of the GSP Substation. VPH05 is offset from views to the GSP substation so cannot be used to demonstrate the effectiveness or not of proposed mitigation/compensation. Additional assessment is required.</p>	<p>already acknowledges that there would be significant effects to views during construction. Therefore, the Applicant does not consider it to be necessary to undertake a further viewpoint assessment at this location.</p>
3.1.3 Comments on any Other Submissions Received at Deadline 1			
5.2	Comments on Additional Data Related to A131 Temporary Haul Route	<p>The Councils are satisfied that no further ecology surveys are needed for the temporary access route off the A131, other than the pre-construction surveys set out in the LEMP.</p> <p>The updated arboricultural survey [REP1-011] of the temporary haul access route identified two veteran oak trees. As these features lie outside of the Order Limits, the Councils are satisfied that that no further arboricultural surveys are needed for the temporary access route off the A131, however a suitable tree protection plan will be required to ensure that the veteran trees, and other trees to be retained, are protected during construction.</p> <p>The new UK Bat Mitigation Guidelines (Reason and Wray 2023) requires compensation for any loss of bat roost resource in advance of tree removal and works need to take place under a Precautionary Working Method Statement. Any additional potential roost assessment of trees for bats will also need to be in accordance with the newly published 4th Ed. Bat Survey Guidelines for Professional Ecologists (Collins ed, 2023).</p>	<p>The Applicant notes the Councils' response that they are satisfied with the surveys undertaken. As noted in the ECC/BDC response, the two veteran trees lie outside the Order Limits and would not be affected by the project. Tree protection measures are set out in the LEMP (document 7.8(B)).</p> <p>The pre-construction surveys for bats will comply with whatever is the current guidance at that time. The mitigation measures set out in the final European Protected Species licence will take into account any current guidance at that time.</p>
5.3	Comments on any other information including any further clarification	<p>Specifically with regards to Limits of Deviation, the flexibility to extend the maximum pylon height upwards by 4m could have significant impacts on the setting of heritage assets nearby. An additional suggestion which has been put forward by The Council's Heritage Consultant is whether an 'Additional Impact Statement' (or similar) could be submitted by way of a requirement, should a</p>	<p>As there are no new overhead lines or pylons proposed in ECC/BDC, the Applicant does not think this request is necessary in relation to ECC/BDC. In addition, the ES assesses the effects of the Proposed Alignment as shown on the General Arrangement Plans [APP-018] and includes sensitivity testing for the flexibility provided within the LoD. The ES presents the</p>

Reference	Matter	Point Raised	Applicant's Comments
	provided by the Applicant at the hearings	pylon over the standard 62.23m height be required? Perhaps there could be some qualifying criteria, such as when a pylon is within 500m of a heritage asset? This is something that The Council's request the ExA explore further with the Applicant to see if any additional layers of protection for heritage assets can be added.	likely significant effects for each topic and where a significant effect has been identified, additional mitigation is proposed where appropriate. This is considered appropriate for managing the likely significant effects of the project.

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