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Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.7.2: Draft Statement of Common Ground Historic England

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

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1. Introduction

1.1 Overview

- 1.1.1 This document supports National Grid Electricity Transmission plc's (here on referred to as National Grid) application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex.
- 1.1.2 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 (National Grid) and another party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.3 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.
- 1.1.4 This SoCG is between National Grid and the Historic Buildings and Monuments Commission for England (hereafter Historic England) relating to the application for development consent for the Bramford to Twinstead reinforcement ('the project'). This SoCG has been prepared in accordance with the guidance for the examination of applications for development consent for Nationally Significant Infrastructure Projects (NSIP) (Planning Act 2008) published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).
- 1.1.5 This SoCG has been prepared to identify matters between National Grid and Historic England in respect to the Bramford to Twinstead Reinforcement only.

1.2 Description of the Project

- 1.2.1 This document supports National Grid's 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 meets the threshold as a NSIP, as defined under Part 3 of the Planning Act 2008, hence National Grid requires a development consent order (DCO).
- 1.2.2 The reinforcement 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 and underground cables to tie the substation into the existing 400kV and 132kV networks.
- 1.2.5 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, 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 National Grid's commitments to Biodiversity Net Gain (BNG).

1.3 This Statement of Common Ground

- 1.3.1 For the purpose of this SoCG, National Grid and Historic England will jointly be referred to as the 'Parties'. When referencing Historic England alone, they will be referred to as 'the Consultee'.
- 1.3.2 This SoCG is structured as follows:
- Section 1 (this section) 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 National Grid and the Consultee;
 - Section 3 sets out cultural heritage matters discussed between National Grid and the Consultee; and
 - Section 4 includes the signing off sheet.

2. Record of Engagement

2.1 Role of the Consultee in the Process

- 2.1.1 Historic England exists to help people understand, value, care for and enjoy England's unique heritage. Historic England is a prescribed consultee for the purpose of section 42(1)(a) of the Planning Act 2008 and is named as such in Schedule 1 of the infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, and perform the functions set out in the National Heritage Act 1983.

2.2 Summary of Pre-application Discussions

- 2.2.1 Pre-application discussions were held with Historic England (then English Heritage) between 2009 and 2013 prior to project pause. A summary of these discussions can be found in options appraisal reporting, such as the Connections Option Report (National Grid, 2012). Due to the lapse in time since these original discussions took place and as key staff may have changed, the SoCG only records the meetings and matters agreed since the project restarted, with the first meeting held between the Applicant and Consultee in February 2021.
- 2.2.2 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
2 February 2021	Meeting to introduce the project	The Applicant introduced the project and outlined the work previously undertaken (pre project pause in 2013) in relation to the options appraisal process including the optioneering in Section A/B in the vicinity of Hintlesham Hall. Following the meeting, the Applicant provided the Consultee with a summary of the previous correspondence on Hintlesham Hall.
12 February 2021	Issue of project timeline	The Applicant issued a timeline of the project along with the minutes from the meeting held on 2 February 2021.
13 March 2021	Launch of Non-Statutory Consultation	The Applicant wrote to the Consultee as they are a prescribed consultee in the DCO process, informing them of the start of the non-statutory consultation and inviting their views. The non-statutory consultation was held for six weeks, between 25 March 2021 and 6 May 2021.
17 March 2021	Issue of Technical Note for Historic England	The Applicant issued a technical note which outlined the proposed methodology for the assessment of Cultural Heritage that will be used on the project.
7 April 2021	Meeting to discuss progress	The Applicant updated the Consultee on the project and there was a discussion about the previous work undertaken at Hintlesham Hall and the potential mitigation measures that may be required to reduce the effects of the project on the setting of the Listed Building.
6 May 2021	Response to non-statutory consultation	The Consultee provided its response to the non-statutory consultation in letter format.
8 June 2021	EIA Scoping Response	The Consultee provided its response to the EIA Scoping Report to the Planning Inspectorate in letter format.

Date	Topic	Discussion Points
30 July 2021	Meeting to discuss progress	The Applicant updated the Consultee on the project, surveys, and the EIA scoping response.
03 September 2021	Issue of proposed viewpoint locations	The Applicant issued the Consultee with a list of the proposed locations for viewpoints and photomontages.
03 December 2021	Issue of documents	The Applicant issued the Consultee with the draft Archaeological Framework Strategy (AFS) and proposed site inspection locations for listed buildings.
10 December 2021	Meeting to discuss progress	The Applicant updated the Consultee on the project, including proposed options at Hintlesham Woods and updates on surveys.
19 January 2022	Launch of the Statutory Consultation	<p>The Applicant wrote to the Consultee as they are a prescribed consultee in the DCO process, informing them of the start of the statutory consultation and inviting their views.</p> <p>The 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.</p>
24 March 2022	Thematic meeting for heritage	The Applicant updated the Consultee and other thematic meeting attendees on the project including an update on the field surveys and the AFS.
13 May 2022	Response to Statutory Consultation	The Consultee provided their response to the Statutory Consultation.
24 March 2022	Thematic meeting for heritage	The Consultee was copied into the minutes and slides from the meeting which focused on approach to archaeology in relation to the project.
10 August 2022	Issue of draft AFS	The Applicant issued the AFS and the proposed Requirement wording for archaeology in the draft Development Consent Order (DCO) to the Consultee for comment.
17 August 2022	Issue of site inspection locations	The Applicant issued the Consultee with a list of the proposed site inspection locations for comment.
17 August 2022	Thematic meeting for heritage	The Consultee declined attendance at the meeting as it was about archaeological (county) matters. The Consultee was copied into the minutes and slides from the meeting.
1 September 2022	Launch of the targeted consultation	The Applicant wrote to the Consultee as they are a prescribed consultee in the DCO process, informing them of the start of the targeted consultation and inviting their views, which ran between 8 September 2022 and 19 October 2022, with a focus on the western part of the Stour Valley.
21 September 2022	Issue of draft Outline Written Scheme of Investigation (OWSI)	The Applicant issued the draft OWSI to the Consultee for comment.

2.3 Summary of Post-submission Discussions

- 2.3.1 Table 2.2 summarises the consultation and engagement that has taken place between the Parties post submission of the application.

Table 2.2 – Post-submission Discussions

Date	Topic	Discussion Points
02 May 2023	Meeting with new contact at Historic England	The Applicant provided an introduction to the project to the new Historic England representative and outlined the key documents within the application for development consent.
14 June 2023	Meeting to discuss progress	The Applicant outlined the key findings of the assessment presented in the Environmental Statement.
9 August 2023	Meeting to discuss the Relevant Representation	The Consultee outlined the key aspects in the Relevant Representation.
11 September 2023	Email on SoCG	The Consultee emailed the Applicant with the latest version of the SoCG with comments that require further discussion.
20 September 2023	Site visit between the Parties	The Consultee and the Applicant undertook a site visit to Hintlesham Hall.
5 October 2023	Email of new wording for EM-AB01	The Applicant emailed the Consultee the proposed updated wording to EM-AB01 and the location of the pylon to the north of Hintlesham Hall.
13 October 2023	Email of planting proposals	The Applicant emailed the Consultee details of the planting proposals at and around Hintlesham Hall.
23 November 2023	Meeting to discuss SoCG	The Applicant and the Consultee had a meeting to discuss the matters in the SoCG.

3. Cultural Heritage Matters

3.1.1 As noted in Section 1.3, the Consultee requested that the Applicant's SoCG template was updated to include a single table covering matters, and then columns to discuss the position and whether the matter is agreed. Table 3.1 provides this table.

Table 3.1 – Cultural Heritage Matters

SoCG ID	Matter	Statement	National Grid's Position	Historic England's Position	Notes
1 The Project					
1.1	Overall	In terms of the project Historic England has focused its comments on Hintlesham Hall, therefore other matters are deferred to the relevant planning authorities.	Agreed	Agreed	Agreed
1.2	Policy and legislation	Relevant national policies and legislation have been included within the Environmental Statement (ES) and the proposals demonstrate an awareness of the statutory obligations regarding the historic environment.	Agreed	Agreed	Agreed
1.3	Consents	In relation to the assessed effects of the project, no associated heritage consents are required in relation to Scheduled Monuments and Listed Buildings.	Agreed	Agreed	Agreed
1.4	Location of Dedham Vale East cable sealing end (CSE) compound	That the Dedham Vale East CSE compound was relocated to its current position (as presented in the application for development consent) in response to feedback from Historic England to move the CSE compound further away from the Polstead Conservation Area.	Agreed	Agreed	Agreed
2 Assessment Approach and Methodology					
2.1	Assessment methodology	The assessment methodology used within the ES Appendix 8.2 Annex A is adequate for assessing potential impacts of the project on Hintlesham Hall. This considers intervisibility and also assesses other aspects of the setting of Hintlesham Hall's setting such as character and context.	Agreed	Agreed	Agreed
2.2	Study area and baseline information	The study area used for the baseline data collection as presented in the ES is suitable for the assessment.	Agreed	Agreed	Agreed

SoCG ID	Matter	Statement	National Grid's Position	Historic England's Position	Notes
2.3	Viewpoint locations in relation to heritage assets	That the Consultee was issued with a list of the proposed locations for viewpoints and photomontages on 3 September 2021 for comment. That the viewpoint and photomontage locations are appropriate in relation to the historic environment.	Agreed	Agreed	Agreed
2.4	Archaeological Framework Strategy (AFS) and Overarching Written Scheme of Investigation (OWSI)	Historic England defer to the archaeological advisors at the County Councils in relation to the approach towards archaeology as set out in the AFS and OWSI.	Agreed	Agreed	Agreed
3 Environmental Impact Assessment					
3.1	Baseline environment	The baseline environment presented within the ES is adequate and includes a list of historical assets that the Applicant has identified in the relevant study area.	Agreed	Agreed	Agreed
3.2	Embedded and good practice measures	Historic England has no comments on ES Chapter 8: Historic Environment [APP-076] as a whole and is focusing its feedback on Hintlesham Hall and ancillary buildings (see specific matters below).	Agreed	Agreed	Agreed
4 Specific Matters – Hintlesham Hall					
4.1	Hintlesham Hall - commitment wording	The proposed embedded measure EM-AB01 which relates to the pylon positions to the north of Hintlesham Hall is considered suitable wording to help mitigate the effect to the hall and the ancillary buildings.	Outstanding	Outstanding	Under discussion
4.2	Hintlesham Hall - Assessment	As set out in Annex A of ES Appendix 8.2: Hintlesham Hall Assessment [APP-128] the impacts from the 400kV overhead line would constitute 'harm' to Hintlesham Hall or its ancillary buildings but would not result in 'substantial harm'.	Agreed	Agreed	Agreed
4.3	Hintlesham Hall – Planting proposals	The planting proposals near Hintlesham Hall (Grade I) would not have a harmful effect on the setting of Hintlesham Hall.	Agreed	Agreed	Agreed
4.4	Hintlesham Hall – Enhancement proposal	The proposed avenue planting off Hintlesham Hall reflects the historic landscape.	Agreed	Agreed	Agreed

4. Approvals

Signed	
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On Behalf of	National Grid
Name	Sally Rotherham
Position	Consents Officer
Date	30 November 2023

Signed	
On Behalf of	The Historic Buildings and Monuments Commission for England
Name	Janine Dykes
Position	Inspector of Historic Buildings and Areas
Date	29 November 2023

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