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Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.8.3: Applicant's Response to the December Hearing Action Points

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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) response to December Hearing Action Points, made in relation to the application for development consent for the Bramford to Twinstead Reinforcement (the project).

1.2 Project Overview

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

1.3 Structure of document

- 1.3.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) response to Action Points addressed to the Applicant arising at the Compulsory Acquisition Hearing 2 and Issue Specific Hearings (ISH) 5 and 6 held week commencing 11 December 2023, in respect of the Bramford to Twinstead Reinforcement (the project):
- Compulsory Acquisition Hearing (CAH2) – 13 December 2023 (see Table 2.1);
Issue Specific Hearing (ISH5) – 13 December 2023 (see Table 3.1); and
Issue Specific Hearing (ISH6) – 14 December 2023 (see Table 4.1).
- 1.3.2 The Examining Authority (ExA) verbally summarised the list of Action Points during each of the Hearings and, in respect of ISH5 only, subsequently issued a written record of the same on 15 December 2023 [**EV-045a**].

- 1.3.3 Only responses to Action Points addressed to the Applicant are provided in this document, as set out above.
- 1.3.4 On occasion, the Applicant has made stylistic/grammatical changes to the wording of these Action Points. However, it is not considered that these changes alter the substance of any of the Action Points.

2. Applicant's Response to Compulsory Acquisition Hearing 2

2.1 The Applicant's Response to Actions Table

Table 2.1 – Response to Compulsory Acquisition Hearing 2 (13 December 2023)

Action No.	ExA Description	Applicant's Response	Deadline
AP1	Submission of the swept-path analysis being undertaken on the proposed alternative access routes for the temporary access route off the A131.	Please refer to the Swept Path Assessment for Alternative Temporary Access Routes off the A131 (Document 8.8.10) submitted at Deadline 6 for the reports of the swept path analysis of the alternative routes as per Figure 5.3 of the Technical Note on Temporary Access Route off the A131 [REP4-009].	Deadline 6
AP2	Regarding plots 630, 631 and 632, which provision in the Development Consent Order (DCO) ensures that access across them will be restricted solely to biodiversity mitigation management measures.	The Applicant has amended the existing commitment EM-AB16 at Deadline 6 in relation to this temporary access route to ensure it is solely used for landscape and ecological planting as intended. EM-AB16 in the Register of Environmental Actions and Commitments (REAC) (Document 7.5.2 (D)) now states: <i>'The temporary access route adjacent to Keeble's Grove (Access AB-EAP2a) will solely be used for the implementation of ecological and landscape mitigation measures and will not be topsoil stripped in order to avoid impacts to the root protection area of this woodland'</i> .	Deadline 6
AP3	Address the position in respect to compulsory acquisition regarding biodiversity net gain (BNG) ahead of the introduction of mandatory BNG requirements in 2025.	As set out in Section 4.10 of the Statement of Reasons [APP-038], all land required for environmental net gain is contained within the Order Limits. Paragraph 4.10.8 of the Statement of Reasons [APP-038] sets out that 'to ensure delivery of the enhancements, the Applicant is seeking voluntary agreements with landowners in the first instance, with compulsory acquisition powers being exercised, if voluntary arrangements are not obtained'. The Applicant has provided further detail as to its position in respect of BNG in reference DC1.6.95 in the Applicant's Responses to First Written Questions [REP3-052]. This includes confirmation that: <i>'whilst BNG is not required by the Environment Act 2021 at the present time, the principles of at least 10% BNG are recognised as an integral component of existing and emerging policy and aligns closely with the Applicant's own commitments.'</i>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>In the proposed revised National Policy Statement (NPS) laid before Parliament in November 2023, NPS EN-5 states expressly that powers of compulsory acquisition can be sought in respect of BNG:</p> <p><i>'2.6.6 As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the provisions of the Planning Act 2008 and any associated guidance.'</i></p>	

3. Applicant's Response to Issue Specific Hearing 5

3.1 The Applicant's Response to Actions Table

Table 3.1 – Response to Issue Specific Hearing 5 (13 December 2023)

Action No.	ExA Description	Applicant's Response	Deadline
AP1	Provide the draft list of sensitive noise receptors that are under consideration for specific noise mitigation at Deadline 6. Provide the final list after it has been agreed with the host local authorities.	<p>The noise sensitive receptors that have been identified using the lower threshold for weekend working are set out in the Technical Note for Noise Sensitive Receptors (Document 8.8.7) submitted at Deadline 6.</p> <p>The Applicant has provided the list of receptors to the local planning authorities for comment, including for those authorities to identify any additional properties that should be considered.</p> <p>The Applicant will consider whether further commitments can be made at the receptors once the list has been agreed.</p>	Deadline 6
AP2	<p>Provide an analysis and detail in relation to outstanding matters that might be viewed as inconsistencies between the ES illustration 2.1 baseline construction schedule [APP-091] and Appendix A which shows the baseline construction schedule with critical path [REP5-027].</p> <p>i) For example, Illustration 2.1, the baseline construction schedule, shows a staggered 132kV overhead line removal approach starting in Q4 2024/ Q1 2025, and re-commencing in Q1/ Q2 2027 whilst the baseline construction schedule with critical path shows 132kV line dismantling in Q1 2025 for 3.5 months. Are the 'general set up activities' (shown on Illustration 2.1 baseline construction schedule) the same activities as 'site</p>	<p>It is important to note the purpose of the programme information that has been provided to the examination to (a) provide a reasonable scenario (s) for the purpose of environmental assessment [APP-091] and (b) to demonstrate the constraints (outages) that apply to the programme and therefore the necessity for the working hours sought [REP5-027]. They are not intended to be the final construction programme (which will be prepared by the appointed main works contractor and support the Stage Plan to be submitted pursuant to Requirement 3 of the draft DCO (document 3.1 (F))) and by necessity they have been simplified to aid understanding and allow export from programming software.</p> <p>The Applicant has responded to the detailed points below in turn:</p>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
	establishment' (shown on establishment in i) baseline construction schedule with critical path).		
ii)	Both baseline construction schedules ([APP-091] and [REP5-027]) show construction works commencing in Q3 2024 (which could be around the earliest period when the time Secretary of State decision could be made). Explain the impact of paragraph 4.1.3 of the Funding Statement [APP-037], which refers to funding being subject to the appropriate internal governance and sanction approval process. Would the transition from consenting (if the DCO was made) to construction involve a governance and sanction period post consent? Would the judicial review period have an impact on this process? How could construction works for the Proposed Development start in Q3 2024?	<p>This is an error. The 132kV overhead line removal needs to be shown in Q1 2025 to provide a clear route for the construction of the new 400kV circuits. There should be no 132kV removal in Q1/Q2 2027 which is shown in error. The overhead line removal in 2027 is the 400kV line adjustments near Bramford Substation.</p> <p>The internal governance process is planned for Summer 2024. Due to the critical nature of this project, the business (National Grid) is being asked to pre-approve the Final Investment Decision (FID) subject to the Secretary of State granting the DCO in September 2024.</p> <p>The Main Works Contractor will be engaged and be in the position to mobilise to discharge requirements subject to the DCO being granted.</p>	
iii)	For the undergrounding cabling works between Stour Valley East and West sealing end compounds, identify circuit 1 and circuit 2, and confirm the length of the underground cables.	<p>The Applicant would be able to begin activities during the judicial review period if that was needed to maintain the programme (such as discharging requirements under the draft DCO (Document 3.1 (F)) and initial works on site). Any such works or operations would be undertaken 'at risk' from a judicial review perspective.</p>	
iv)	Summarise the reinstatement works shown on the baseline construction schedule with critical path ([REP5-027], Appendix A) and explain why reinstatement does not start until completion of cable and civils works for the Stour Valley undergrounding cable section.	<p>The following measurements are cable lengths of undergrounding cabling works between Stour Valley East and West cable sealing end compounds and not the ground level measurements:</p>	
v)	Explain why the cables and civils works for the Stour Valley do not start until March 2025.	<p>-Bramford, Braintree, Bulls Lodge Circuit 2; 5,275m.</p>	
vi)	Confirm the core working hours used to generate the Gantt chart in the baseline construction schedule with critical path (Appendix A). (Table 2.1 in [REP5-027] shows 12hrs Monday to Friday, and 10hrs for alternate weekend working, apparently without any breaks.)	<p>-Bramford, Braintree, Rayleigh Circuit 1; 5,095m.</p> <p>The Bramford, Braintree, Bulls Lodge Circuit (Circuit 2) leaves Bramford as the Northern circuit, but when it attaches to the existing 4YLA overhead line (Alphamstone to Braintree) the cables snake</p>	

Action No.	ExA Description	Applicant's Response	Deadline
	vii) Confirm the assumptions used in Appendix A, the baseline construction schedule with critical path. For example, are Christmas and Easter nonworking periods?	round to join the eastern circuit on the 400kV overhead line; hence it is physically longer. Circuit 1 leaves Bramford as the southern circuit and joins the western circuit on the existing 4YLA overhead line south.	
	viii) Should the Saturday core working hours in scenario 1 and scenario 2 show 5hrs to reflect 8:00-13:00 core working hours Table 2.1 in [REP5-027]? If so, what impact would this have on readiness for outage 4 and subsequent outages for both scenarios?	iv) Whilst the subsoil can be replaced above the cable ducts once installed, the topsoil cannot be replaced at this time, as the temporary access route would need to remain in place until after the new circuits have been commissioned.. The Applicant would need to carry out normal Stage 1 cable commissioning during construction, prior to Outage 4. The temporary access route would need to remain in place until service voltages and current flow have been proven at Stage 2 commissioning. Even though the risk of a failure is small at this time, the delays of having to reinstall the temporary access route to affect a repair would have an unacceptable delay to the programme and additional cost. v) The Stour Valley cable route civil and duct works are preceded by establishment of the main site compound (directly after DCO granted), fencing / vegetation clearance, bellmouth installation, topsoil / drainage and the temporary access routes. The first civil activities starting in March are the trenchless crossings. vi) The core working hours used to generate the Gantt chart in the baseline construction schedule with critical path (Appendix A [REP5-027]) are 12hrs Monday to Friday, and 10hrs for alternate weekend working. The requirement for breaks is built into the working day and the planning of each activity, as the schedule is built on the delivery experience of a National Grid Framework Contractor who is used to delivering similar projects.	

Action No.	ExA Description	Applicant's Response	Deadline
		<p>vii) The schedules make the allowance for the normal construction industry shut down of two weeks at Christmas. The non-working over Easter covers the two bank holidays (from Thursday to Tuesday inclusive).</p> <p>viii) By revising the Saturday hours up from four to five there is a minimal effect of four extra hours worked per month in scenario 1 and 2, reducing the duration of each scenario by nine days. This is shown clearly by the Gantt chart provided in the submission [REP5-027] both fail to be ready for the start of outage four.</p>	
AP3	At Deadline 6, provide a response to whether it would be helpful to explicitly include pre-commencement operations in Requirement 7.	<p>The Applicant notes that references in Requirement 7 (Construction Hours) of Schedule 3 to the draft DCO (Document 3.1 (F)) to 'work', 'operations' and 'activities' mean <i>any</i> work, operations or activities comprised in the authorised development.</p> <p>As is explained at Paragraph 4.6.14 of the Explanatory Memorandum (Document 3.2 (E)), the concepts of 'commencement' and 'pre-commencement' fulfil a separate purpose (i.e. they each operate only where there is a provision in the draft DCO linked to the temporal concept of 'commencement').</p> <p>The 'pre-commencement operations' (as specified in Article 2(1) of the draft DCO) are, in any event, operations, works or activities forming part of the authorised development.</p> <p>The Applicant does not therefore consider that further clarification is required in terms of the drafting of Requirement 7.</p> <p>However, the Applicant has amended Paragraph 4.3.21 of the Explanatory Memorandum to provide additional clarity.</p> <p>Paragraph 4.3.21 now reads as follows:</p> <p><i>'Requirement 7 (Construction hours) specifies the hours during which construction work may be carried out. <u>For the</u></i></p>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
		<u>avoidance of doubt, Requirement 7 applies to the “pre-commencement operations” (as the term is defined in Article 2(1) of the Order).’</u>	

4. Applicant's Response to Issue Specific Hearing 6

4.1 The Applicant's Response to Actions Table

Table 4.1 – Response to Issue Specific Hearing 6 (14 December 2023)

Action No.	ExA Description	Applicant's Response	Deadline
AP1	For Deadline 6, submit into the Examination all relevant information that has been shared with the Local Highway Authorities since ISH3.	<p>The Applicant has submitted the following information into the Examination:</p> <ol style="list-style-type: none"> 1. Spreadsheet in excel format of forecasted traffic flow to each access by heavy goods vehicle (HGV) category (Excel version of which has previously been submitted into the examination[REP4-006]); 2. Four reports by Wynns regarding evaluation of Abnormal Indivisible Loads (AIL) submitted at Deadline 6 as Document 8.8.11). 3. Sequencing of works and potential impact on Public Rights of Way (PRoW) Closures (submitted at Deadline 6 as Document 8.8.9). <p>The Applicant has also shared raw survey data directly to the Local Highway Authorities. Due to the format and large volume of raw data (a series of Excel data sheets) this has not been submitted into Examination. This traffic survey data was used to develop the Transport Assessment [APP-061] and Chapter 12 of the Environmental Statement [APP-080].</p> <p>The Applicant will submit the following information into Examination at a later deadline:</p> <ol style="list-style-type: none"> 1. Sketch of visibility splay for the access AB-AP5 (near Rose Cottage), as shown in Appendix A of this document, to indicate more detail on geometry at that location; This was provided as an indicative sketch to the LHAs and it is proposed to submit this in to the examination formally once the further surveys being undertaken at this location are complete and the sketch can be updated. 	Deadline 6
AP2	For Deadline 6, provide confirmation as to whether the parties are agreed on the "peak hour", and if not, detail	Standard practice when developing a Transport Assessment (TA) is to identify and assess peak hours when total traffic flow is forecast to be highest in absolute terms. It is during these hours that impacts on road network performance will be most substantial.	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
	what the parties perceive to be the peak hour.	<p>The survey data referenced in AP1 was used to identify the network peak hours across the TA study area as 0800-0900 (AM peak hour) and 1600-1700 (PM peak hour). This is set out in paragraph 4.3.6 of the TA [APP-061].</p> <p>Environmental Statement (ES) Figure 12.4 [APP-154] summarises the project construction traffic estimated per day during the peak period of construction activity (sheets titled 'Daily Construction Traffic and Staff Vehicles'). This indicates that on all but three roads, the project would add less than 100 vehicles per direction per day during the peak construction period, even with substantial contingency included in the forecast (described in Section 6.2 of the TA [APP-061]). The three roads where the project construction forecast is higher are the A134, the A1071 and the A1214. These are main roads in the study area that typically carry more than 5,000 vehicles per direction per day, on some sections more than 10,000. This is also set out in ES Figure 12.4 [APP-154] (sheets titled 'Daily Baseline Traffic').</p> <p>Temporary project traffic would therefore (even during the peak period of construction activity and with substantial contingency included) be very modest generally and insubstantial on most roads in the TA study area. It would not have any impact on the identification of peak hours.</p> <p>There is no requirement referenced in TA guidance (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, 2014) to assess traffic impacts outside identified peak hours; it is not standard practice to do so in most cases; and it would not be proportional or reasonable to do on this project given the modest levels of temporary construction traffic forecast as summarised above.</p> <p>However, it is noted that relevant references in guidance covering Environmental Impact Assessment (EIA) are different. These are covered in the Applicant's response to AP4.</p>	
AP3	For Deadline 7, review the collision data to be submitted at Deadline 6 by Suffolk and Essex CC and then assess the impacts for the identified locations.	<p>The Applicant will review the information provided by the Local Highways Authorities and prepare a short report which will be submitted into Examination at a future deadline. This will summarise, for affected routes, the extent to which the collision patterns occurring on each route might be affected by the construction traffic.</p> <p>At ISH6 a submission at Deadline 7 was proposed. Given the holiday period, this allows a short time to analyse complex data and, therefore, the Applicant proposes that Deadline 8 is a more appropriate submission date.</p>	Deadline 8
AP4	For Deadline 6, as part of post-hearing submissions, provide summaries regarding the impacts for the EIA, as well as the TA (e.g. the worst-case hour and effects on the	Suffolk County Council (SCC) indicated in Annex D of its Local Impact Report (LIR) [REP1-044] that discussion regarding ES Chapter 12 [APP-080] should focus on material outcomes rather than ' <i>debating the idiosyncrasies of methodology</i> '. The Applicant agrees with this position.	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
	community), within the context of the updated guidelines.	<p>The absolute level of daily project traffic forecast during the peak construction period is very low as set out in the response to AP2, even with substantial contingency included in the forecast (described in Section 6.2 of the TA [APP-061]). ES Figure 12.4 [APP-154] summarises (on the sheets titled 'Daily Construction Traffic and Staff Vehicles') that on all but three roads, the project would add less than 100 vehicles per direction per day during the peak construction period. The three roads where the forecast is higher (the A134, the A1071 and the A1214) are main roads that typically carry more than 5,000 vehicles per direction per day, on some sections more than 10,000. This is also set out in ES Figure 12.4 [APP-154] (sheets titled 'Daily Baseline Traffic').</p> <p>It is the Applicant's view therefore that it would be disproportionate, unreasonable, and unnecessary to undertake assessment of any further time periods beyond the peak construction day that has been assessed in ES Chapter 12 [APP-080]. This view accounts for the very low volume of daily project traffic forecast (even with substantial contingency included) and its distribution across the working day (for example construction vehicles, which make up the majority of the forecast, are assumed to distribute broadly evenly between 0700 and 1900). Assessing any other time-period is consequently very unlikely to materially change the outcome of the assessment reported in the ES Chapter 12 [APP-080].</p> <p>All guidance relevant to ES Chapter 12 [APP-080] requires an approach to assessment that is proportionate considering the overall scale of impact of the project. Guidance is also designed to consider permanent impacts as well as temporary impacts. Project traffic would be temporary during construction only and the assessed peak would only occur for a short period. This further supports the Applicant's view that undertaking assessment of any further time periods would be disproportionate, unreasonable, and unnecessary.</p> <p>The Applicant notes the reference to assessing the 'hour of greatest change' in Annex D of SCC's LIR [REP1-044], which makes specific reference in this regard to the Guidelines for the Environmental Assessment of Road Traffic (GEART) (Institute for Environmental Assessment (IEA), 1993).</p> <p>GEART indicates (in the summary of Chapter 3, Traffic Issues, on page 26) that '<i>assessments should consider the period (possibly the hour) at which the impact is greatest and the period at which the impacts exhibit the greatest change</i>' and that '<i>traffic assessments may need to be undertaken for a number of time periods</i>' [emphasis added by Applicant]. It therefore does not set out any definitive requirement to assess the hour of greatest change.</p> <p>GEART was updated in July 2023 as the Environmental Assessment of Traffic and Movement (EATM) by the Institute of Environmental Management and Assessment (IEMA). EATM could not be considered in the ES as it had not been published when the ES was submitted to the ExA in April 2023. However, the Applicant notes that the EATM also does not specify any requirement</p>	

Action No.	ExA Description	Applicant's Response	Deadline
		<p>to assess the hour of greatest change. It also omits references previously contained in GEART suggesting that an hourly assessment should be considered for topics such as severance.</p> <p>Similarly, there is no requirement to assess the hour of greatest change in the Design Manual for Roads and Bridges (DMRB) LA 112 Population and human health (Highways England, 2020). It remains the Applicant's view that DMRB LA 112 is appropriate guidance for assessing the construction traffic and transport impacts of a linear infrastructure project (and has been used on other consented linear infrastructure projects such as the Richborough Connection project).</p> <p>In summary, the low volume of traffic that would be temporarily generated by the project does not warrant the assessment of an hour of greatest change, and there is no requirement in any relevant guidance to do so. The assessment of the peak day set out in ES Chapter 12 [APP-080] is sufficient given the context summarised in this response to understand the magnitude of impact and significance of effect of the project on the reported topics.</p> <p>In addition, Section 15.6 of ES Chapter 15: Cumulative Effects Assessment [APP-083] sets out an assessment of the intra-project effects on communities. This recognises in paragraph 15.6.19 that local communities may be affected by temporary PRow diversions, road restrictions, diversions and closures of the public highway, an increase in traffic, and dust, noise and light spill close to construction working areas.</p> <p>The assessment concludes in paragraph 15.6.26 and 15.6.27 that there is likely to be some disruption to local communities during construction as would be the case of any construction site of similar developments. However, the good practice measures set out in the CEMP (Document 7.5 (C)) and the CoCP [REP3-026] would help to reduce the effects. Due to the nature of the linear project and the transient nature of the works, the communities in any given area would be affected for a shorter period of time than the overall construction duration. Therefore, although there would be cumulative effects on local communities during construction, these are considered to be not significant.</p>	
AP5	For Deadline 6, detail the Applicant's position on the TA being final given the five-year period for beginning the authorised development.	<p>It is standard practice and commonplace in both planning applications and DCOs to develop a final TA that sets out the impact of the project on traffic and transport and submit it for examination as part of the application.</p> <p>It is also standard practice in planning applications and DCOs for planning permission or development consent to be granted for a set period of time based on examination of the application, including the final TA. For this project, that period is five years, which is a standard allowance that has been applied to numerous recent DCOs (including Lower Thames Crossing,</p>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>A12 Widening and Luton Airport Expansion, all of which have been through examination in 2023).</p> <p>A five year implementation period (as prescribed in Requirement 2 of the draft DCO (Document 3.1 (F)) is consistent with Regulation 6 of the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015. (The effect of Requirement 2 is set out at Paragraph 4.3.7 of the Explanatory Memorandum (Document 3.2 (E))).</p> <p>As noted at Issue Specific Hearing 6 (ISH6), there are also multiple examples of DCOs being applied for and granted for longer periods on the basis of a final TA being submitted as part of the application.</p>	
AP6	For Deadline 6, submit into the Examination the PRow phasing plan.	See Technical Note on PRow Closure Sequencing (document 8.8.9) submitted at Deadline 6.	Deadline 6
AP6	For Deadline 6, check the PRow MP for inclusion of the PRow through the Stour Valley identified by Simon Amstutz as being impacted.	The route shown as a long-distance path on Ordnance Survey mapping as St Edmund Way Stour Valley Path is shown on the Access, Rights of Way and Public Rights of Navigation Plans [APP-012]. This includes footpath FP 7 93 which crosses the Order Limits and is indicated as a temporary stopping up P-G-5, with a diversion to the east along a route labelled as PD-G-5. That route does not extend to the northern extent of the Order Limits, but this is because the most northerly part of this does not need to be closed to deliver the relevant part of the works. The route is already included in the PRow Management Plan on pages 31 (for construction of the Temporary Access Route) and page 32 (for removal of that route) [REP3-056].	Deadline 6

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