

LOCAL PLAN SUB-COMMITTEE AGENDA

Thursday 17th March 2022 at 6.00pm

Council Chamber, Braintree District Council, Causeway House, Bocking
End, Braintree, CM7 9HB

THIS MEETING IS OPEN TO THE PUBLIC

*(Please note this meeting will be broadcast via the Council's YouTube Channel,
webcast and audio recorded)*

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Members of the Local Plan Sub-Committee are requested to attend this meeting to
transact the business set out in the Agenda.

Membership:-

Councillor J Abbott

Councillor K Bowers

Councillor G Butland

Councillor J Coleridge

Councillor T Cunningham

Councillor Mrs C Dervish

Councillor T Everard

Councillor D Hume

Councillor Mrs W Scattergood (Vice Chairman)

Councillor Mrs G Spray (Chairman)

Councillor P Thorogood

Councillor J Wrench

Apologies: Members unable to attend the meeting are requested to forward their
apologies for absence to the Governance and Members Team on 01376
552525 or email governance@braintree.gov.uk by 3pm on the day of the
meeting.

A WRIGHT
Chief Executive

INFORMATION FOR MEMBERS - DECLARATIONS OF INTERESTS

Declarations of Disclosable Pecuniary Interest (DPI), Other Pecuniary Interest (OPI) or Non- Pecuniary Interest (NPI)

Any member with a DPI, OPI or NPI must declare the nature of their interest in accordance with the Code of Conduct. Members must not participate in any discussion of the matter in which they have declared a DPI or OPI or participate in any vote, or further vote, taken on the matter at the meeting. In addition, the Member must withdraw from the Chamber where the meeting considering the business is being held unless the Member has received a dispensation from the Monitoring Officer.

Public Question Time – Registration and Speaking on an Agenda Item

Members of the public wishing to speak are requested to register by contacting the Governance and Members Team on 01376 552525 or email governance@braintree.gov.uk by **midday on the second working day** before the day of the Committee meeting. For example, if the Committee meeting is on a Tuesday, the registration deadline is midday on Friday, (where there is a Bank Holiday Monday you will need to register by midday on the previous Thursday).

The Council reserves the right to decline any requests to register to speak if they are received after this time.

All registered speakers will have 3 minutes each to make a statement.

Documents: There is limited availability of printed Agendas at the meeting. Agendas, Reports and Minutes can be accessed via www.braintree.gov.uk

WiFi: Public Wi-Fi (called BDC Visitor) is available in the Council Chamber; users are required to register when connecting.

Public Attendance at Meeting: Public attendance is welcomed, but is subject to restrictions due to the Council's arrangements for keeping Causeway House COVID secure and visitors safe.

Public attendance is limited and will be on first come first served basis with priority given to public registered speakers. In order to maintain safe distances, the Council may have to refuse entry to members of the public. The public will not be able to sit in the Council Chamber, but will be permitted to observe the meeting from a public gallery through a large screen. Alternatively, the Council meetings are webcast and are available via the Council's YouTube Channel and can be viewed by the public as a live broadcast, or as a recording following the meeting.

Public speakers and public attendees are required to attend on their own, and where possible only one representative of any community group, family household or Company should attend.

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Comments and Suggestions: We welcome comments to make our services as efficient and effective as possible. If you have any suggestions regarding the meeting you have attended, you can send these to governance@braintree.gov.uk

PUBLIC SESSION

Page

- 1 Apologies for Absence**
- 2 Declarations of Interest**
To declare the existence and nature of any Disclosable Pecuniary Interest, other Pecuniary Interest, or Non-Pecuniary Interest relating to Items on the Agenda having regard to the Code of Conduct for Members and having taken appropriate advice where necessary before the meeting.
- 3 Minutes of the Previous Meeting**
To approve as a correct record the Minutes of the meeting of the Local Plan Sub-Committee held on 25th November 2021 (copy previously circulated).
- 4 Public Question Time**
(See paragraph above)
- 5 Minerals Local Plan Review Changes - Response** **5-9**
- 6 Bramford to Twinstead Grid Reinforcement (B2T) - Nationally Significant Infrastructure Project** **10-57**
- 7 Maldon District Council – Issues and Options Consultation 2022 – Response** **58-65**
- 8 Urgent Business - Public Session**
To consider any matter which, in the opinion of the Chairman, should be considered in public by reason of special circumstances (to be specified) as a matter of urgency.
- 9 Exclusion of the Public and Press**
To agree the exclusion of the public and press for the consideration of any Items for the reasons set out in Part 1 of Schedule 12(A) of the Local Government Act 1972.
At the time of compiling this Agenda there were none.

PRIVATE SESSION

Page

- 10 Urgent Business - Private Session**
To consider any matter which, in the opinion of the Chairman, should be considered in private by reason of special circumstances (to be specified) as a matter of urgency.

Agenda Item: 5

Report Title: TO AGREE A RESPONSE TO THE MINERALS LOCAL PLAN REVIEW CHANGES	
Report to: Local Plan Sub-Committee	
Date: 17th March 2022	For: Decision
Key Decision: No	Decision Planner Ref No: N/A
Report Presented by: Julie O'Hara	
Enquiries to: Julie O'Hara	

1. Purpose of the Report

- 1.1 Members may recall discussing the Minerals Local Plan 2014 Review at a meeting of the Local Plan Committee of the 20th April 2021, following which this Council issued its response including reiterating its concerns including regarding the number and distribution of sand and gravel extraction sites within the district. The Minerals Authority, Essex County Council, has felt it necessary, following the consultation and further deliberations, to propose additional changes which are significant enough to require further public consultation. This report seeks to outline these proposals and propose a response.

2. Recommendations

- 2.1 A written response be sent to Essex County Council expressing the following points;
- Disappointment expressed that new sites will need to be allocated prior to the end of the plan period
 - Whilst not formally part of this consultation, Braintree District would wish to reiterate its concerns regarding the number of minerals extraction sites already within in its area.
 - The District acknowledges that the position expressed in the Topic paper is an interim one and looks forward to commenting on the final analysis in a forthcoming public consultation.
 - If new allocations are required, these are kept to the minimum necessary and should be placed in location across the County to minimise mineral miles and impacts on local communities.
 - Support the plan led approach that resists approval of windfall sites and that mineral extracted through approval of windfall sites is counted as contributing towards meeting the County's mineral need.
 - Braintree District retains the right to comment more fully at a later stage when proposals are more fully developed and during the call for sites consultation.

3. Summary of Issues

- 3.1 This public consultation is described as a 'focussed consultation' which relates only to proposed changes to (i) Policy S6 General Principles for Sand and Gravel Provision, and (ii) the issuing of a call for sites. The explanation for the consultation and the methods by which the County Council reaches its conclusions are set out in the "Minerals Local Plan Review Topic Paper, Policy S6: Provision for Sand and Gravel Extraction 2022". The County's Proposed changes are set out in "Policy S6 of the Minerals Local Plan 2014: Draft Amendments"
- 3.2 This is an interim consultation and will be followed at later date by another Reg 18 public consultation following further work. As such the details and calculations outlined here, might be subject to change
- 3.3 In short, changes to the means by which mineral extraction needs are calculated has changed since the 2014 Minerals Local Plan was written and adopted. Whereas the plan was heavily based on the National and Sub National Guidelines for Aggregates Provision in England 2005 – 2020, these have now expired, and the NPPF in 2012 introduced a new way of calculating need which was based on a rolling average of 10 year sales data. The recalculations have been compared with existing Plan allocations and planning permissions and examine a number of scenarios. The County consider that a mineral need should be based on the 10 year average sales as required by the NPPF, but plus a buffer of 20% to allow flexibility should sales, increase during an economic upturn.
- 3.4 The County Council's response to Braintree District's comments on the Consultation Review is set out in the schedule in the Topic paper. Part of the Districts response is not directly relevant to this consultation as this consultation does not directly examine site suitability or spatial distribution of sites. Nevertheless, the District did welcome that no new sites were to be allocated and that position has now changed and did reiterate concerns made at Examination on the distribution of sites within its area.

i) Policy S6 General Principles for Sand and Gravel Provision

- 3.5 This policy sets out the amount of sand and gravel needed to provide a steady and adequate supply annually. As such it influences the size of the landbank and number of sites needed to be allocated. It requires a landbank of at least 7 years and preserves the planned approach by acting to resist applications outside the sites allocated, unless certain criteria are met.
- 3.6 In this consultation the County Council have proposed that the text of Policy S6 be altered to replace 4.31mtpa with 3.74mtpa. Associated changes are proposed to the supporting text. The changed figure in this Topic paper is intended to be indicative as the calculation will be updated at a later date, with more data and subject to a Sustainability Appraisal (SA) ahead of a further

Reg 18 public consultation. Further work might also indicate change is needed to the means of calculating this figure which is explained in this Topic paper.

ii) Call for sites

- 3.7 Given the long lead time from application to extraction taking place, the NPPF requires that a landbank be maintained to enable supply for 7 years. The County's conclusion is that the landbank will fall below 7 years in 2023 – 2024 and more allocations are required if a 7 year landbank, as required by the NPPF, is to be maintained. Given that the Call for sites will itself be a long process and subject to public consultation and other administrative processes, it should commence soon. Without an adequate landbank the County consider there to be a risk that the plan may be found unsound.

Other Issues

Windfall Sites

- 3.8 A plan led approach is followed by allocating sufficient sites and resisting windfall site unless there is an overriding benefit. The landbank would not include an assumed contribution from windfall, marine or recycled or secondary sources to the landbank total as the contribution such site make is small. The issue of windfalls is relevant when considering the anticipated Coggeshall Flood Alleviation Scheme.

- 3.9 Braintree District in its comments stated the following

"It is recognised that the plan review would consider the potential Flood Alleviation scheme as a windfall site. If this site was to be worked, it would generate a considerable amount of saleable sand and gravel which Braintree District Council would request, by view of its scale, to be counted towards meeting part of the County's sand and gravel extraction targets for the relevant plan period".

- 3.10 The County Council's response was;

"The response requests amendments to MLP Paragraph 3.105 (3.98) and Policy S6 to be more explicit that windfall sites would be considered in relation to the existing distribution of allocated sites and would not be permitted where they result in or contribute to overconcentration of mineral extraction sites in one area of the County. The proposed amendment in part is considered to already be addressed through existing wording in Paragraph 3.107 (3.100) and Policy S6. Paragraph 3.107 (3.100) states that 'All proposals will be considered against policies in the Development Plan.' Whilst Policy S6 is proposed to be amended to state that 'Mineral extraction outside of Preferred Sites ~~or Reserve Sites~~ will be resisted supported by the Mineral Planning Authority providing the Applicant unless the applicant can demonstrate...' The proposal is environmentally suitable, sustainable, and consistent with the relevant policies set out in the Development Plan"

Extension to Quarries

- 3.11 The County notes that 3 out of the 4 allocations which have not come forward are extensions to existing quarries which are reliant on the previous workings being undertaken before they can come forward and that an overreliance on such sites could hinder supply. I would draw to attention Bradwell quarry in this respect, although the call for sites would be a more appropriate forum in which to comment fully on this matter.

County Response to Braintree District Comments

- 3.12 The County Council response to Braintree District's comments is noted. This targeted consultation is not the most appropriate forum to discuss these comments further, particularly those of geographical distribution of sites. The Council reserve the right to make further comment on matters outside the scope of this consultation where it is appropriate to do so.
- 3.13 The recommendations set out in this report will help the Council to deliver the following Corporate Objectives:
- A sustainable environment and a great place to live, work and play;
 - A well connected and growing district with high quality homes and infrastructure;
 - A prosperous district that attracts business growth and provides high quality employment opportunities;
 - A high performing organisation that delivers excellent and value for money services;
 - Delivering better outcomes for residents and businesses and reducing costs to taxpayers.

The provision of mineral supports economic activity and building within the district, providing homes and jobs for the public in a timely manner.

4. Options

- 4.1 To approve submission of the comments outlined in the letter at **Appendix 1** in response to the consultation.
- 4.2 To approve amended comments to the submission.
- 4.3 To not submit any comments to the consultation.

5. Next Steps

- 5.1 To continue engagement with Essex County Council on the minerals plan through Duty to Cooperate as they work towards a further iteration of the draft Plan.

6. Financial Implications

- 6.1 There are no direct financial implications arising from this report.

7. Legal Implications

7.1 There are no direct legal implications arising from this report.

8. Other Implications

8.1 There are no other implications arising from this report.

9. Equality and Diversity Implications

9.1 This is an Essex County Council document and therefore they will need to consider any implications under Section 149 of the Equality Act 2010.

10. Background Papers

Minerals Local Plan

2014 <https://assets.ctfassets.net/knkzaf64jx5x/5UZuVtnjZbJ81olvZoZKVX/90acfc65df6fa8ee8ab20df3f0cda1c8/essex-minerals-local-plan-adopted-july-2014.pdf>

Braintree District Council Response to Minerals Local Plan Review 2014

Review <https://braintree.cmis.uk.com/braintree/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/1172/Committee/6/Default.aspx>

Topic Paper Policy S6: Provision of Sand and Gravel Extraction 2021 ([Topic Paper Policy S6: Provision for Sand and Gravel Extraction 2021 \(PDF, 2.63MB\)](#))

Policy S6 of the Minerals Local Plan 2014 Draft Amendments 2022 (track changes version of the above Topic

Paper https://assets.ctfassets.net/knkzaf64jx5x/4eMqQdglTFYtPfttSu8Yi5/e3214b7a605cc8446b1c9e54927108c8/Policy_S6_of_the_Minerals_Local_Plan_2014_Draft_Amendments.pdf

Agenda Item: 6

Report to:	LOCAL PLAN SUB-COMMITTEE
Report Title:	Nationally Significant Infrastructure Project (NSIP) – Bramford to Twinstead
Date:	17th March 2022
For:	Decision
Key Decision:	No
Decision Planner Reference Number:	N/A
Report Presented by:	Alan Massow / Mathew Wilde
Report Author:	Alan Massow / Mathew Wilde
Enquiries to:	Alan Massow / Mathew Wilde

1. Purpose of the Report

- 1.1 The following report considers the Statutory Consultation under Section 42 of the Planning Act 2008 in respect of National Grid Electricity Transmission's (NGET) Bramford to Twinstead 400kV grid reinforcement (B2T). This project is a Nationally Significant Infrastructure Project (NSIP).
- 1.2 The purpose of this report is to provide Members with an overview of the project and its likely impacts. Following this, Members are requested to endorse the technical Statutory Consultation response to NGET attached in Appendix 1 to this report. Members can request that the response in Appendix 1 is amended prior to its submission to NGET by 21st March 2022.
- 1.3 An extract of some maps are at the end of the report, as well as a link to the document library website.

2. Project Overview

- 2.1 In summary, the Bramford to Twinstead project in its entirety proposes the following:
 - Approximately 29km of new 400 Kilovolts (kV) electricity transmission connection between Bramford substation (in Suffolk) to Twinstead Tee (in Essex/Braintree), comprising approximately 19km of overhead line and 10km of underground cable along the entire route.
 - Four cable sealing end compounds (CSEC) to connect overhead line and underground cable sections together.

- Removal of approximately 25 km of existing 132 kV pylons between Burstall Bridge and Twinstead Tee.
 - Removal of approximately 2.5 km of existing 400 kV pylons south of Twinstead Tee.
 - A new grid supply point (GSP) substation at Butler's Wood, to connect the local distribution network (operated by UK Power Networks) into the National Grid.
- 2.2 A detailed summary of the works specific to Braintree District can be found in Section 5 below.
- 2.3 Braintree District Council (BDC) has been working with Essex County Council, Suffolk County Council, and Babergh District Council who are all impacted by this proposal, as well as the Dedham Vale Area of Outstanding Natural Beauty (AONB) Project in respect of the potential impacts of this project on extending the AONB into Braintree District (for the Stour Valley).
- 2.4 In this case, BDC are not the determining authority. BDC, like the other impacted Councils, are classified as 'Host Authorities' for the purposes of the Planning Act 2008 and The Infrastructure Planning (EIA) Regulations 2017. As a Host Authority BDC play an important role in helping to shape and assess the impacts of the proposals. The Planning Inspectorate however is ultimately the determining authority for the development. NGET will submit a Development Consent Order (DCO) later this year to the Planning Inspectorate, with a public examination of the proposals to follow after.
- 2.5 The project is currently at the 'Statutory Consultation' stage. The Bramford-Twinstead project has already been through various stages including the 'non-statutory consultation' stage and 'EIA Scoping' stage. National Grid have amended their proposals over time to reflect feedback received.
- 2.6 A Statement of Community Consultation was put forward by National Grid, which has informed the statutory consultation stage now. The Statutory Consultation stage includes more detailed information about the above proposals, and also includes a Preliminary Environmental Impact Report (PEIR) which seeks to inform the overall Environmental Statement (EIA) when this is submitted later in the year. The PEIR impacts are summarised in this report, with the full technical responses contained in Appendix 1. It is intended that this response in Appendix 1 is sent to National Grid.

3. Public Consultation Overview

- 3.1 The statutory consultation period for the project is currently ongoing for an 8 week period; it started on 25th January 2022 and finishes on Monday 21st March 2022.
- 3.2 It comprised sending out packs of information to all those residents, Parishes, Members and businesses within a 1km radius from the draft Order Limits. The draft Order Limits are the proposed outer limits of the land required either on a temporary or permanent basis to deliver the project. The consultation also extends to those areas within 5km of the project area, but through indirect engagement such as local newspapers (e.g. Halstead Gazette) advertising of the consultation period.
- 3.3 The statutory consultation also included 10 webinars, 10 'ask the expert' call sessions and 4 public exhibitions that anyone wishing to comment on the scheme could attend.
- 3.4 This consultation follows on from a non-statutory consultation launched in early-mid 2021. Officers at a delegated level (with some Member input) have already provided comments on the non-statutory consultation, Statement of Community Consultation and Scoping Report.

4. Recommendations

- 4.1 Members endorse the official response letter as BDC's response in Appendix 1 to be submitted to National Grid by 21st March 2022.

SUMMARY OF ISSUES

5. Braintree District Council / Essex County Council Project Proposals

- 5.1 The current proposals within Braintree District largely relate to 'Section G – Stour Valley' and will be the focus of this report. Works outside (but close) to the Authority boundary are also considered important to consider.
- 5.2 Starting in the Suffolk/Babergh side, the new 400 kV line would be undergrounded in the Dedham Vale AONB. It would then come above ground through Leavenhealth and Docking Tye, before hitting a Cable Sealing End Compound (CSEC) to the South of Little Cornard at Woodhouse Green. The location of the Woodhouse Green CSEC in Suffolk has remained in a similar position from non-statutory consultation

stage to now, but has the possibility of being visible from views across the valley if not appropriately placed and mitigated.

- 5.3 The CSEC at Woodhouse Green would transfer the overhead line back into an underground line through the Stour Valley. The new 400 kV line therefore enters the Braintree District via an underground cable. The cable would remain underground until it meets the final CSEC of the route to the west of Alphamstone. Once at the CSEC, the 400 kV line would connect to the existing 400 kV overhead line. As such, in the Braintree District there would be no new 400 kV overhead line.
- 5.4 The underground route has been modified comparatively to the non-statutory consultation. Previously the underground line ran to the north of Henny Back Road at a higher overall level. The underground link would now be to the south of Henny Back Road, on the western side of Alphamstone. The change was due to ground conditions, the desire to reduce ground disturbance, and the change in position of the CSEC. This also facilitates more existing overhead line to be removed between the Stour Valley West CSEC and Twinstead Tee.
- 5.5 The proposals in the Braintree District also include the removal of Approximately 2.5 km of existing 400 kV pylons south of Twinstead Tee and the removal of the existing 132 kV line overhead line up to the 'diamond crossing' to the south west of Sparrows Farm. However, the existing 132 kV overhead line to the west of the diamond crossing which runs to the north of Twinstead and to the south of Waldergrave Wood (where the substation would be) is to be retained. National Grid have said this asset is owned by UKPN and they would need to sign up to its removal.
- 5.6 National grid have confirmed they maintain a dialogue with UKPN about this asset and its future use, and are inviting comments on its retention. The 132 kV line now seems to be limited in its purpose as the 'diamond crossing' is to be removed (as explained in 5.5) as the line would just terminate. In paragraphs 1.4 & 1.5 of Appendix 1, Officers have suggested that this line also be removed owing to the fact that a substation is proposed.
- 5.7 A new grid supply point (GSP) substation is also proposed at Butler's Wood, to connect the local distribution network (operated by UK Power Networks) into the National Grid. It should be noted that National Grid intend to submit a twin tracked Planning Application (Town and Country Planning Act) for the substation in isolation. The substation will remain part

of the NSIP but the Planning Application would come before Members of the Planning Committee at a later date in 2022.

6. Undergrounding, Cable Sealing End Compounds & Substation

- 6.1 When the project was first put forward in 2013 (before it was put on hold until 2021) undergrounding was proposed in the Stour Valley to protect the visual and special character of the Stour Valley. At non-statutory consultation, the Council's position was firmly that the cable should be undergrounded in the Stour Valley and made a case for this. National Grid have now confirmed they intend to propose the route in the Stour Valley is Undergrounded.
- 6.2 Undergrounding is not however without its own issues. A summary of what undergrounding entails is as follows:
- The draft Order Limits (the red line of where the route corridor is) are generally 100m wide to accommodate an 80m wide working trench area to allow 20m flexibility for unforeseen circumstances.
 - The draft Order Limits are wider at the trenchless crossing and other areas of constraint, to accommodate space for the additional temporary works. The underground cables (excluding the fibre optic cables) would be a minimum of 1m below ground level but could be to an unlimited depth.
 - A trenchless crossing is proposed for crossing the River Stour to reduce potential impacts on the habitats and water-based recreation.
 - Earth would be utilised to cover up any open trenches and turfed (or similar) – National Grid cables will be a minimum of 900mm deep to the protective tiles. It is understood that crops can be farmed over the top of the cables, and landscape reinstatement will include planting and hedgerows, although deep rooting trees may not be planted over the cables themselves. It is understood the remaining corridor would be a 60m permanent swathe once the earth has been put back in.
- 6.3 Cable Sealing End Compounds (CSEC) are pieces of infrastructure which facilitate the transition between overhead and underground cables. They generally consist of a compound type structure housing the electrical equipment necessary to transition the electricity line.
- 6.4 An indicative plan was submitted with the statutory consultation illustrating what the CSEC could look like. The one in Braintree District shows a total

compound measuring 70m by 54m and inside the compound it includes steel gantries which are approximately 14m high with associated electrical equipment at a lower level below.

- 6.5 It is therefore important that these CSEC are appropriately sited and mitigated to mitigate any wider landscape impacts.
- 6.6 The Grid Supply Point (GSP) substation is similar to a CSEC but houses Super Grid Transformers which convert 400 kV electricity into 132 kV electricity to be utilised in the local network. The proposals for the GSP are yet to be finalised, however indicative plans have also been submitted with the Statutory Consultation. The compound itself is approx. 270m in length and approx. 50m wide. It would be located between two ancient woodlands (Butlers Wood and Waldergrave Wood) in Bulmer. The equipment would have a total height of approximately 12m for the down lead connector, and approximately 10m for the super grid transformer (everything else would be lower in height).
- 6.7 Whilst not directly comparable in terms of scale/form, there is an existing substation at Galleys Corner Braintree which provides a similar function to the substation proposed here.
- 6.8 The impact of the development proposals in this case will be considered within an Environmental Statement (ES) which will be submitted with the Development Order Consent application (DCO). At this Statutory Consultation stage, National Grid have submitted the Preliminary Environmental Information Report (PEIR) following the Scoping Report mid-late 2021. The PEIR is where the various specialisms look at the impacts of the proposed development to inform the final Environmental Statement. The Scoping, PEIR and ES all form part of the EIA process.
- 6.9 The full technical response is contained within Appendix 1, however this report contains a short overview of the issues under the same category headings.

7. Historic Environment (Including archaeology)

- 7.1 Full comments are set out in Section 3 of the Appendix letter response. BDC instructed Place Services for built heritage and archaeological advice on the submitted scoping opinion.
- 7.2 Whilst the proposal would not result in a direct impact on the fabric heritage assets, there will be changes to their setting which could harm

their significance, as well as potential indirect harm from works caused by construction activity.

- 7.3 The Historic Buildings Consultant (HBC) recommend that further survey work should be undertaken to identify any non-designated heritage assets, as well as clarification that no demolition of existing structures or buildings will occur.
- 7.4 The new GSP substation between Butlers and Waldergrave Woods could also impact on grade II and II* buildings. The undergrounding also has potential for impact on Nether House Farm, and the potential impact of cables on the setting of other listed buildings.
- 7.5 Overall, the HBC considered that a great deal more information is required on the impact of built heritage, however this information should be provided at the Environmental Statement (ES) stage.
- 7.6 In terms of archaeology; it is considered that the most significant impact to archaeological deposits is likely to be the undergrounding sections where a 100m wide strip will require excavation. This will damage or destroy deposits. Because of the level of impact an appropriate level of evaluations is essential to understand the impact of the development for the Environmental Screening.
- 7.7 The supporting information seems reliant on geophysical survey which often gives uncertainty of results until an area has been trial trenched. A program of trial trenching should therefore be undertaken to avoid significant archaeological deposits being missed or significance not identified.
- 7.8 Overall, the Archaeological Officer sought assurances that further trial trenching would be carried out and the impacts considered within the ES as appropriate.

8. Landscape and Visual

- 8.1 Full comments are set out in Section 4 of the Appendix letter response. BDCI commissioned Place Services to undertake an assessment of landscape and visual impact in relation to the PEIR.
- 8.2 The landscape and visual chapter of the PEIR sets out the preliminary environment assessment of the likely significant effects of the project on landscape and visual receptors, such as landscape designations and the landscape character of the area. Visual receptors include those who could

experience different views, and the level of amenity, through the removal of or introduction of manmade and natural features.

- 8.3 To summarise the methodology is generally accepted for the categories of landscape and visual receptors, and the methodology has been amended as a result of the EIA scoping which is also supported. The PEIR does however require updating to reflect to combined and sequential landscape effects and their consideration.
- 8.4 Whilst lighting has been scoped out by the Scoping Report and Planning Inspectorate report, no information has been supplied regarding the size and location of construction laydown, compound areas or their operating hours. As such night time effects should be scoped in.
- 8.5 The ES should include sensitivity testing treating the Stour Valley Project Area as a separate landscape designation to the Stour Valley Special Landscape Area.
- 8.6 The PEIR judges that landscape and visual effects may arise from underground cabling as trees can't be planted above or close to underground cables. As we have not received information on the impacts on hedgerows and trees, we don't have confidence that impacts are not significant and require further clarification. In addition, without information on hedgerows impact we are unable to determine how this impact would affect landscape characters and designations.
- 8.7 For the GSP Substation it is disagreed with that the landscape effects will not be significant and states that minor changes would not affect landscape character. This is not agreed with as there will be harm but just not at a significant magnitude. However reference to enhancement planting which could reconnect Butlers Wood and Waldergrave Wood is supported subject to local native species and a review of historic field patterns.
- 8.8 Overall, whilst the Landscape Officer generally accepted the methodology outlined in the PEIR for assessing landscape impact, they still raised concerns about a lack of information on hedgerow and tree loss.

9. Biodiversity

- 9.1 Full comments are set out in Section 4 of the Appendix letter response. Braintree District has commissioned Place Services to provide comment on the biodiversity/ecology impacts of the proposal. The most significant

impacts are likely to be in respect of tree and hedgerow loss, however the precise detail in respect of hedgerows is not known.

- 9.2 Whilst the precise detail of impact on hedgerows is not known it is assumed that an 80m working area would be required to remove hedgerows. Efforts to reduce this to 50m are welcomed. Construction would involve the removal of hedges, however once complete the hedgerow will be replanted with shallow rooted species which we recommend are of native species.
- 9.3 Section 40 of The Natural Environment and Rural Community Act 2006 gives public bodies duty to conserve bio-diversity. All non-significant effects on priority habitats and species will be needed in a non-EIA, so that the Local Planning Authority and Secretary of State can demonstrate their s40 duty.
- 9.4 Non-statutory designated sites should be referred to as LoWS in Essex.
- 9.5 It is acknowledges that Great Crested Newts are scoped out from further assessment in the ES. It is expected that best practice methodology will be used to mitigate impacts on other species during construction. It should also be noted that not having a record of a species does not necessarily mean that the species is not present.
- 9.6 Confirmation should be provided that the requirement included in the Ofgem RIIO-2 (Ofgen document which sets out what is expected from gas and electric transmission companies which includes an incentive to deliver net gain and other benefits), will be met for this project.
- 9.7 Overall, more information is required to understand the impacts on hedgerows and consequentially biodiversity along the route.

10. Noise and Vibration and Contamination and Air Quality

- 10.1 This is covered in detail in section 6 of the Appendix Response Letter. Braintree District Council has commissioned Wardell Armstrong to provide comments on noise and vibration. Chapter 14 of the PEIR covers these issues.
- 10.2 To summarise the majority of receptors have been scoped out and this has been agreed with. For noise sensitive receptors there is a concern that details of any embedded noise mitigation is scarce and some consideration of operation noise from electrical substations should be available. In

addition no assessment seems to have been done on ecological receptors, however this could be potentially scoped out.

- 10.3 Subject to further information and clarification, the information and assessments presented in Chapter 14 of the PEIR appear to be reasonable and the findings and approach consistent with what would be expected for a proposed development of this nature.
- 10.4 It is noted that Health and Wellbeing (with a particular reference to electromagnetic fields (EMF)), has been scoped out, on the basis that the project will comply with relevant guidelines and Codes of Practice, as well as the topic's general coverage in other areas (e.g air quality). Officers have no objection in principle to this being scoped out, but officers would reserve judgement to see the separate evidence document which is to be submitted with the DCO.
- 10.5 Chapter 10 of the PEIR covers contamination. It is necessary to consider the potential effects of the project on human health in respect of ground contamination of controlled water receptors.
- 10.6 The PEIR explains that the risks from potential land contamination are at worst low/medium provided good practice is followed, this includes impacts on groundwater. The approach is described in the PEIR is consistent with current guidance and its conclusions reasonable, but there are some limitations in relation to the transparency, completeness and clarity of the data and assessments.
- 10.7 There are a number of private water supplies (PWS) within the study area in Braintree District. The PEIR explains that further assessment will be presented in the ES in respect the effect on groundwater quality, including the potential for the proposed development to introduce new contaminants through the subsurface or to provide transport pathways for existing contamination. It has also been noted in our response that groundwater levels can often be under 1m whereas the PEIR says that groundwater is unlikely to be encountered at this depth.
- 10.8 The information and assessment in this chapter appears to be reasonable and the findings and approach is consistent with what is expected for a proposed development like this. Some further information and clarification are required to verify the accuracy of the assessment outcomes.
- 10.9 BDC has previously submitted comments on Air Quality at the EIA screen phase of this proposal. These comments are reiterated that for air quality it is agreed that there should be no significant potential for releases to air

at the operational stage and the construction phase will be assessed in accordance with IAQM guidance which is appropriate

11. Cumulative Effects

- 11.1 Cumulative Effects is considered in Section 7 of the Appendix letter response.
- 11.2 Cumulative Effects considers the Intra-project effects (more than one impact from the same development – e.g the construction and operating phase overlapping) and Inter-project effects (more than one impact from other projects in conjunction with this project).
- 11.3 In terms of Intra-project effects, the Council at non-statutory consultation stage considered that the construction and operation phase of development were unlikely to overlap due to the nature of electricity transmission. Therefore the focus primarily should be on Inter-project effects.
- 11.4 NSIP projects are now to be reviewed within a 50km zone of the Draft Order Limits to assess inter-project effects. Other major applications remain at 10km distance. There are a number of other NSIP's in Braintree and across the Eastern region, all of which could impact on this project and/or have combined impacts (e.g construction traffic).
- 11.5 Of these other projects, the East Anglia Green project is of particular concern with regard to cumulative effects with the Bramford-Twinstead project, as the route corridor is likely to go through part of Braintree District and neighbouring authorities between Norwich and Tilbury at similar times. Whilst the proposed route corridor is yet to be consulted on, it is expected that the ES for the B2T project undertakes a comprehensive cumulative impact assessment between the two projects. Some assumptions have been made within the PEIR document of this project, however by the time the ES is submitted further information should be available.
- 11.6 Overall at this stage insufficient information is submitted to adequately determine the inter-project effects of the development. These details should however be contained within the ES when it is available.

12. Geology and Hydrogeology, Agriculture and Soils, Major Accidents and Disasters & Traffic and Transport

- 12.1 These topics are outside of the Councils statutory function; they instead fall with other organisations such as Essex County Council. Therefore as a

Council we are referring to the relevant consultee comments in respect to these technical issues.

13. Socio-Economics, Recreation and Tourism

- 13.1 The Scoping Report concluded that the project would be unlikely to result in significant effects for any of the individual aspects within the Socio-economics, Recreation and Tourism chapter, when taking into account the embedded and good practice measures. The Planning Inspectorate agreed with this.
- 13.2 However, the scoping assessment acknowledged that there could be likely significant effects when these aspects are considered cumulatively across EIA chapters (intra-project) and in combination with other proposed developments (inter-project).
- 13.3 In any case, Officers consider the omission of this chapter is unacceptable omission owing to cumulative impacts of this project with other projects on skills and tourism. It should be noted that National Grid are looking to provide some mitigation for these areas, despite being scoped out.

OPTIONS AND IMPLICATIONS

14. Option 1 – Proceed as Drafted

- 14.1 Option 1 is that Members endorse the response to the Statutory Consultation response as set out in the letter appended to this report.
- 14.2 Officers consider option 1 is the most appropriate course of action owing to the accepted need case for the development and the advanced stage that the NSIP is at.

15. Option 2 – Proceed but with Amendments

- 15.1 Option 2 is that Members ask for some changes to the response to the Statutory Consultation response as set out in the letter appended to this report.
- 15.2 This option is appropriate if Members feel that the letter misses something that should be said about the project.

16. Next Steps

- 16.1 The Statutory Consultation Response must be submitted to NGET by 21 March 2022.
- 16.2 The currently anticipated timescale for the DCO process is as follows:
- a) Submission of DCO application to PINS during Quarter 4 of 2022;
 - b) Examination by PINS during Quarters 1 and 2 of 2023;
 - c) Recommendation by PINS during Quarter 3 of 2023;
 - d) Decision by Secretary of State during Quarter 4 of 2023;
 - e) Requirements discharged by Local Planning Authorities during Quarters 1 and 2 of 2024;
 - f) Build by NGET commences during Quarter 3 or 4 of 2024;
 - g) Operation begins in 2028.

17. Financial Implications

- 17.1 Braintree District Council and the other Host Authorities are currently negotiating with National Grid to cover the costs of the project via a Planning Performance Agreement (PPA).
- 17.2 This will cover the Local Authority costs associated with assessing the impact of the project at the various stages.

18. Legal Implications

- 18.1 None at this time.

19. Other Implications

- 19.1 None at this time.

20. Equality and Diversity Implications

- 20.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:

- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
 - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not
 - (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 20.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- 20.3 An EQI will need to be undertaken by the applicant but as this is as an external consultation this is not appropriate for BDC to carry out.

21. List of Appendices


- 21.1 *Appendix 1 – Formal Response Letter to National Grid (which also appends subsequent formal consultee responses).*

22. Background Papers

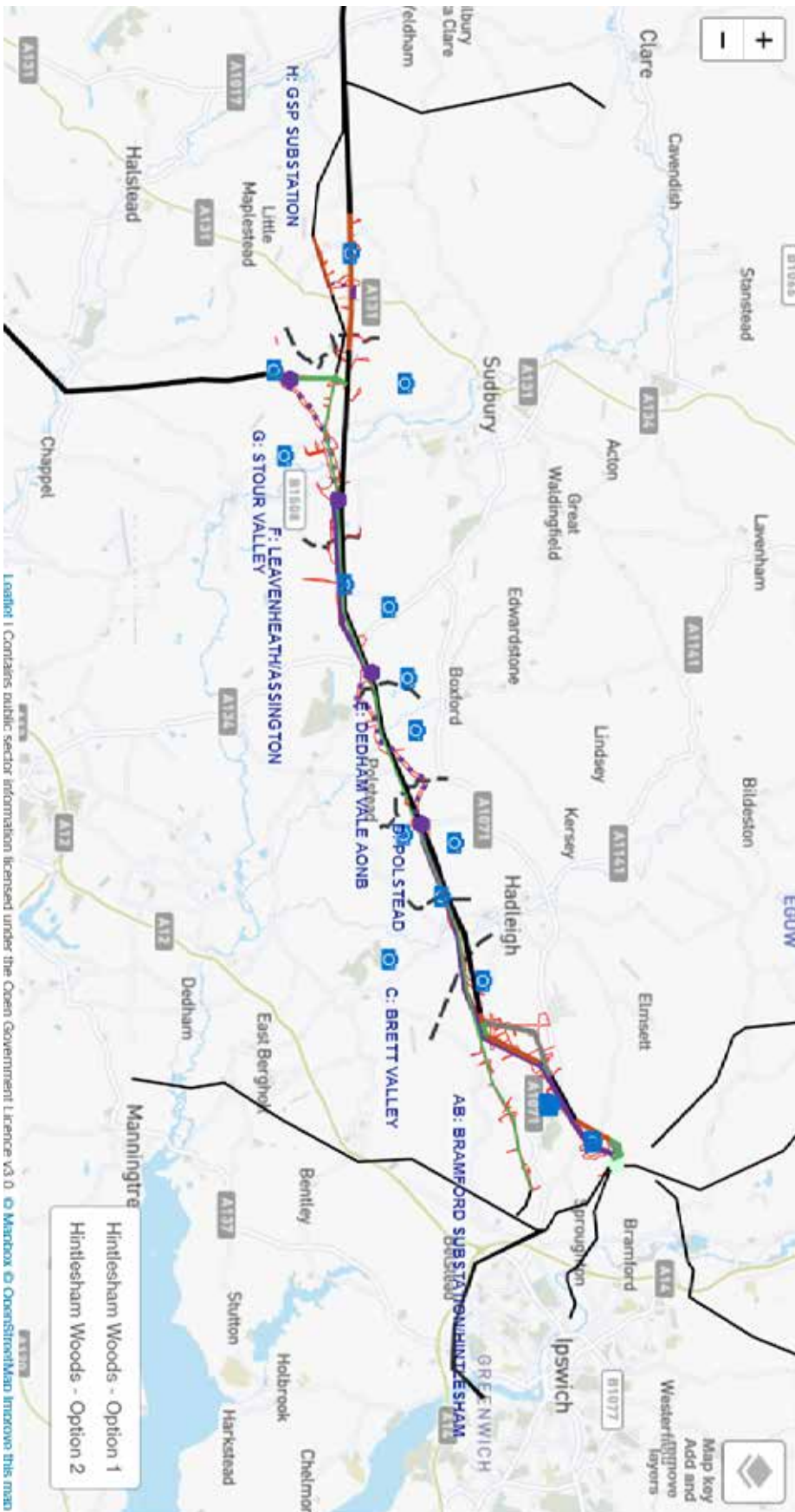
- 22.1 All supporting information is provided on the National Grid website; link below:

<https://www.nationalgrid.com/uk/electricity-transmission/network-andinfrastructure/bramford-twinstead>

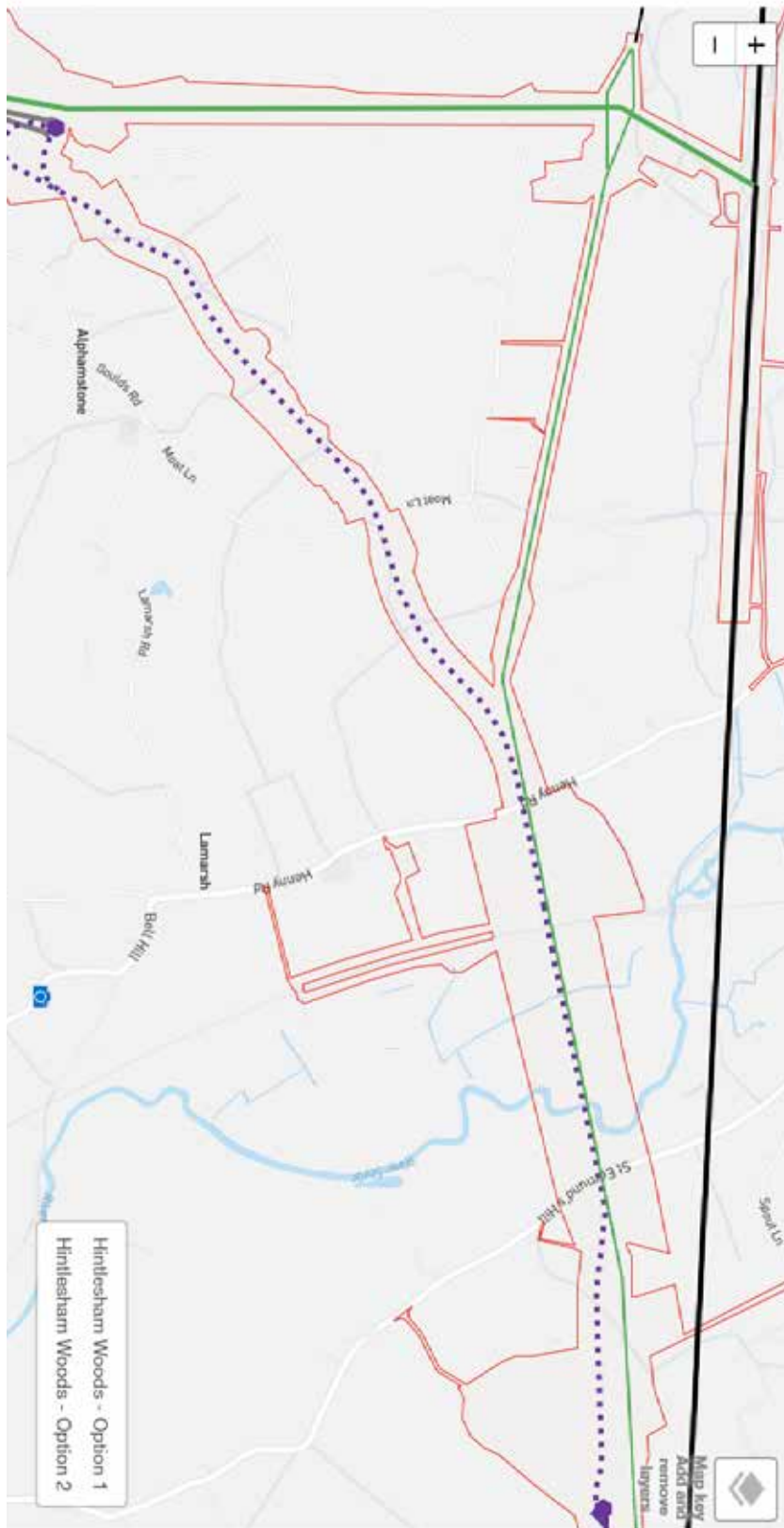
MAP – Next page but key below:

- ☒ Default
 - ☐ Open Street
 - ☐ Satellite
-
- Draft order limits
 - - Section boundaries
 - Existing 400kV overhead line
 - Existing 132kV overhead line
 - Existing substation
 - Proposed 400kV overhead line
 - - - Proposed 400kV underground cables
 - - - Proposed 132kV underground cables
 - Proposed cable sealing end compound
 - Proposed grid supply point substation site
 - Modification works to 400kV overhead line
 - Modification works to 132kV overhead line
 - Proposed realignment of existing 400kV overhead line
 - Proposed 132kV overhead line removal
 - Proposed 400kV overhead line removal
- Hintlesham Woods - Option 1**
- Hintlesham Woods - Option 2**
-  Photomontage Viewpoints

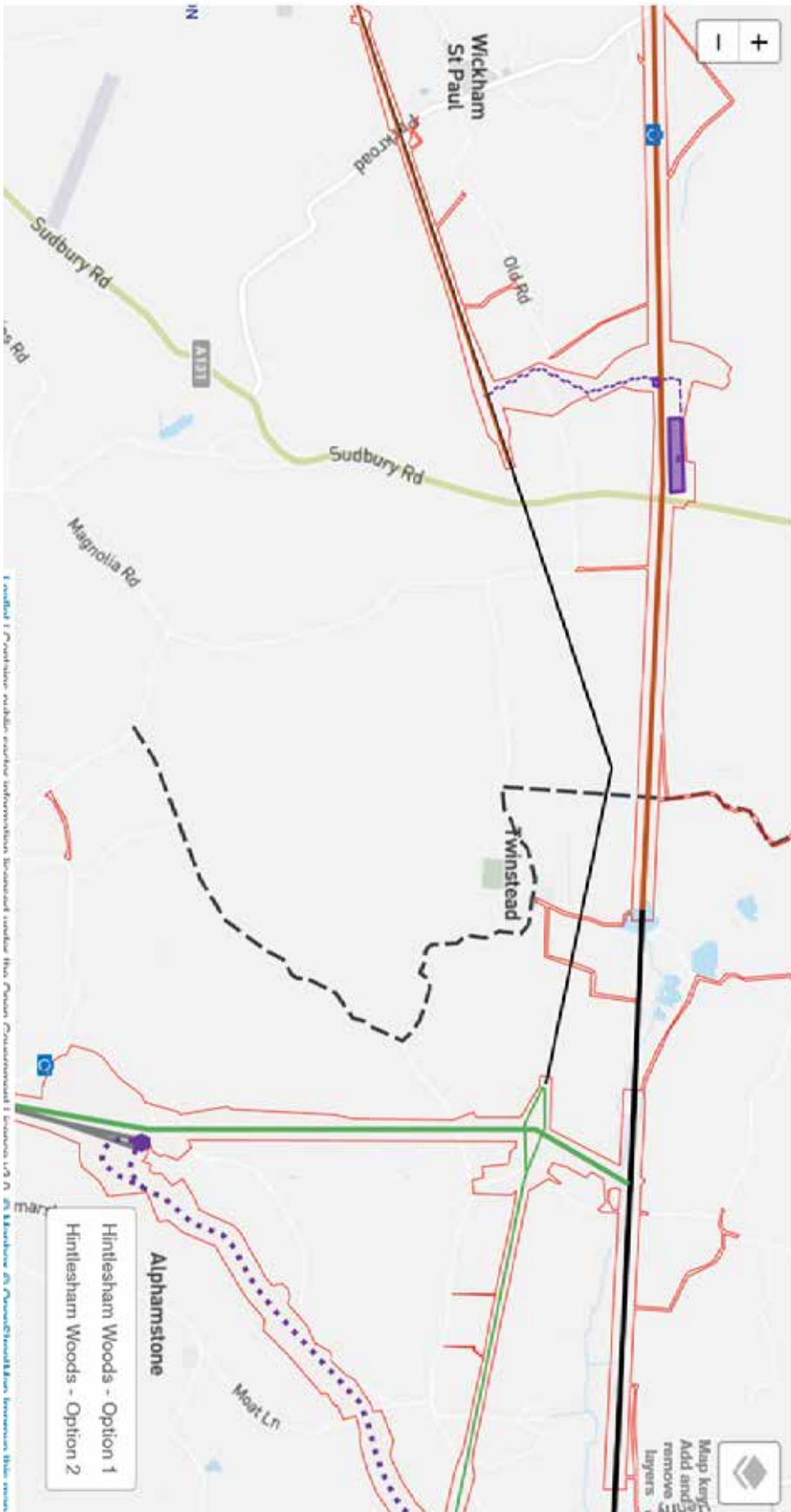
Whole Route



Braintree Section / Edge of Suffolk



Substation (purple rectangle) and edge of new line



Our ref: 21/01334/ODC
Direct Dial: 01376 552525 ext. 2512
Ask for: Mathew Wilde
Date: 17/03/2022



Mr Stevens
 National Grid
 1 - 3 Strand
 London
 WC2N 5EH

Development Management
 Causeway House Braintree
 Essex CM7 9HB

Tel: 01376 557779
Email: planning@braintree.gov.uk

**PURPOSE OF
 LETTER:**

Braintree District Council response to NG Statutory consultation
 on the Bramford to Twinstead Reinforcement Project

Dear Mr Stevens

Thank you for consulting Braintree District Council as a Host Authority on the Bramford to Twinstead Reinforcement Project statutory consultation. This letter intends to act as Braintree District Council's (BDC) official response to the statutory consultation with a focus on environmental issues set out within the Preliminary Environmental Impact Report (PEIR).

1. Overview

- 1.1. Braintree District Council (BDC) understands the continued need for this network reinforcement project between Bramford and Twinstead Tee.
- 1.2. BDC have declared a Climate Change Energy and announced a target to be carbon neutral (as far as practical) by 2030. BDC have subsequently produced a Climate Change Strategy (2021-2023) seeking to provide a framework to achieve this goal. BDC acknowledge that this network reinforcement project will help achieve this goal by enabling a greater proportion of new renewable energy to the Braintree District and beyond. It should be noted however that this project (or any climate change project) will not be supported at any cost; the harms of the project alone, as well as cumulatively and in combination with other projects, need to be adequately recognised, assessed, appropriately mitigated, and, if necessary, suitably compensated for.
- 1.3. BDC welcome that National Grid (NG) have responded to the comments made in the non-statutory response by confirming their intention to underground within the Stour Valley. It is noted that within the Braintree District, the only additional over ground infrastructure would be the Sealing End Compound by Henny Back Road, and the substation at Butlers Wood. BDC also acknowledge the changes made to the scheme with regards to the underground cable routing and sealing end compound location.
- 1.4. BDC acknowledge the further detail provided with regards to the proposed substation at Butlers Wood and indicative images of the sealing end compounds. While these images and plans assist in understanding the likely impacts of these pieces of infrastructure, further information is required to be able to fully assess their impacts.

- 1.5. BDC would however query whether the retention of the existing 132 kV line to the West of the 'Twinstead Tee' is necessary owing to the removal of the wider line, and also the proximity of the proposed substation. While it is positive that a large section of the 132 kV line is to be removed in the Braintree District, its removal (to where the underground cable connection is proposed) would be of an even bigger benefit to the scheme, and also assist in justifying the sub-station further.
- 1.6. Overall, while BDC accept the principle of development, further information and evidence is required through the Environmental Statement and follow-up detailed proposals before BDC can confirm their support for the revised route. That said, BDC support the undergrounding of the cable route for the Stour Valley in principle, and continues to be willing to work with NG through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement.
- 1.7. BDC also require further information with regards to the sub-station at Butlers Wood and will reserve the right to comment on this when more detail to assess impacts is available.

2. EIA Approach and Method

- 2.1. BDC accept that NG have been following the necessary EIA steps so far in assessing the likely significant effects of the development. BDC welcome that where limited information is available, that a worst case scenario is assessed.
- 2.2. The categories set out in the PEIR broadly reflect those at the scoping stage. These include:
 - Landscape and Visual
 - Biodiversity
 - Historic Environment
 - Water Environment
 - Major Accidents and Disasters
 - Cumulative Effects
 - Geology and Hydrogeology
 - Agriculture and Soils
 - Traffic and Transport
 - Air Quality
 - Noise and Vibration
- 2.3. It is noted that Health and Wellbeing (with a particular reference to electromagnetic fields (EMF)), has been scoped out, on the basis that the project will comply with relevant guidelines and Codes of Practice, as well as the topic's general coverage in other areas (e.g air quality). While BDC have no objection in principle to this being scoped out, BDC would reserve judgement to see the separate evidence document which is to be submitted with the DCO.
- 2.4. It is also noted that Socio-Economics, Recreation and Tourism has been scoped out of the assessment as a standalone chapter, but aspects would be considered within the cumulative effects section. BDC believe this is an unacceptable omission owing to cumulative impacts of this project with other projects on skills and tourism. Although it is noted that the CEA (*cumulative effects assessment*) will consider potential significant effects on amenity in terms of socio-economic and tourism receptors.
- 2.5. As a general point, BDC expect all necessary and suitable compensatory measures to be secured at the examination stage and thereafter implemented as such.
- 2.6. The particular topics identified in paragraph 2.2 above are explored more below. The responses by the relevant specialisms are enclosed in the following appendices:

- Appendix 2 – Built Heritage Advice (Place Services)
- Appendix 3 – Archaeology Advice (Place Services)
- Appendix 4 – Ecology Advice (Place Services)
- Appendix 5 – Landscape Advice (Place Services)
- Appendix 6 – Environmental Health Advice - Noise (Wardell-Armstrong)
- Appendix 7 - Environmental Health Advice - Geology and Hydrogeology (Wardell-Armstrong)

3. Historic Environment (Including archaeology)

- 3.1. Braintree District Council (BDC) instructed Place Services for built heritage and archaeological advice on the submitted scoping opinion. Their full responses are appended to the response.
- 3.2. Focusing firstly on above ground heritage impacts, BDC fully endorse the comments made by the Historic Buildings Consultant Laura Johnson and would ask that these are taken as Braintree's response to the Historic Environment scoping request. This response will not repeat these comments verbatim, but reiterate a number of key points.
- 3.3. Whilst it is largely agreed with the statements in the PIER that there will be no direct impact on the fabric heritage assets there will be changes to their setting which could harm significance, as well as potential indirect harm from works caused by construction activity. Survey work should be undertaken to identify any non-designated heritage assets. Finally, it should be clarified that no demolition of existing structures or buildings will occur.
- 3.4. A feedback form was provided by NGES and the answers are contained in the appendix. The primary concern from this is for the new GSP substation between Butlers and Wldegrave Woods due to the potential impact on grade II and II* buildings, and the potential for impact caused by undergrounding on Nether House Farm, and the impact of cables on the setting of other listed buildings.
- 3.5. Overall, it is considered that a great deal more information is required on the impact of built heritage, however this information should be provided at the Environmental Statement (ES) stage.
- 3.6. Turning to below ground heritage impacts, BDC also fully endorse the comments by the Principle Historic Environmental Consultant Richard Havis and would ask that these are taken as Braintree's response to the Historic Environment scoping request. Again, this response will not repeat these comments verbatim, but reiterate a number of key points.
- 3.7. Geophysical surveys should not be relied on where there is an uncertainty whether archaeological remains are present. Instead trial trenching, which would provide a much better understanding of any archaeological remains, should occur on as much of the underground route as possible prior to the submission of the ES.
- 3.8. Good practice measures should extend to known archaeological sites being protected. The completion of a palaeo-environmental evaluation within the valley is particularly important.
- 3.9. Impacts of the removal of hedgerows on protected lanes in particular need to be considered. The ES should establish if directional drilling is necessary to avoid harming heritage impacts. Impacts from construction routes and road widening (where necessary) will need to be fully set out and considered especially in the context of protected lanes.

- 3.10. When assessing the impact of a protected lane, the impacts of future use should also be considered (as a direct result of the development proposal).
- 3.11. Finally, the importance of completing an appropriate level of archaeological evaluation for the Environmental Statement cannot be understated, owing to the disruption that would be caused by the cable undergrounding in the Braintree District.
- 3.12. Richard Havis' response also comments on appendix's 4.1 (Outline CoCP) and Appendix 8.2 (Archaeological Fieldwork Strategy). The comments on these documents are not repeated within this letter. However, for the avoidance of doubt, BDC also endorse the comments made with regards to these documents and out urge NG to make any necessary adjustments as required.

4. Landscape and Visual

- 4.1. The landscape and visual chapter of the PIER sets out the preliminary environment assessment of the likely significant effects of the project on landscape and visual receptors, such as landscape designations and the landscape character of the area. Visual receptors include those who could experience different views, and the level of amenity, through the removal of or introduction of manmade and natural features.
- 4.2. To summarise the methodology is generally accepted for the categories of landscape and visual receptors, and the methodology has been amended as a result of the EIA scoping which is also supported. The PIER does require updating to reflect to combined and sequential landscape effects and their consideration.
- 4.3. Whilst lighting has been scoped out by the Scoping Report and Planning Inspectorate report, no information has been regarding the size and location of construction laydown or compound areas or their operating hours. As such night-time effects should be scoped in.
- 4.4. Whilst National Grid has agreed with Natural England that the Stour Valley will be considered as forming the setting of the AONB and the Stour Valley Special Landscape Area, this is not supported. The ES should include sensitivity testing treating the Stour Valley Project Area as a separate landscape designation to the Stour Valley Special Landscape Area.
- 4.5. Whilst reference is made to the management plan for the AONB, other documents such as the Managing a Masterpiece Evaluation Report should also be considered.
- 4.6. The PIER has judged that landscape and visual effects may arise from underground cabling as trees can't be planted above or close to underground cables. As we have not received information on the impacts on hedgerows and trees, we don't have confidence that impacts are not significant.
- 4.7. For the GSP Substation it is disagreed with that the landscape effects will not be significant and states that minor changes would not affect landscape character. This is not agreed with as there will be harm but just not at a significant magnitude. However, reference to enhancement planting which could reconnect Butlers Wood and Waldegrave Wood is supported subject to local native species and a review of historic field patterns.

- 4.8. Finally, without information on hedgerows impact we are unable to determine how this impact would affect landscape characters and designations.

5. Biodiversity

- 5.1. Whilst the precise detail of impact on hedgerows is not known it is assumed that an 80m working area would be required to remove hedgerows. We welcome efforts to reduce this to 50m. Construction would involve the removal of hedges, however once complete the hedgerow will be replanted with shallow rooted species which we recommend are of native species.
- 5.2. Section 40 of The Natural Environment and Rural Community Act 2006 gives public bodies duty to conserve biodiversity. All non-significant effects on priority habitats and species will be needed in a non-EIA, so that the Local Planning Authority and Secretary of State can demonstrate their s40 duty.
- 5.3. Non-statutory designated sites should be referred to as LoWS (Local Wildlife Site) in Essex.
- 5.4. It is acknowledged that Great Crested Newts are scoped out from further assessment in the ES. It is expected that best practice methodology will be used to mitigate impacts on other species during construction. It should also be noted that not having a record of a species does not necessarily mean that the species is not present.
- 5.5. Confirmation should be provided that the requirement included in the Ofgem RIIO-2 for biodiversity will be met for this project.
- 5.6. Finally, to reiterate more information is required to understand the impacts on hedgerows along the route.

6. Noise and Vibration and Contamination and Air Quality

- 6.1. Braintree District Council has commissioned Wardell Armstrong to provide comments on noise and vibration. Chapter 14 of the PIER covers these issues. Full comments are provided in the appendix. To summarise the majority of receptors have been scoped out and this has been agreed with. For noise sensitive receptors there is a concern that details of any embedded noise mitigation is scarce and some consideration of operation noise from electrical substations should be available. In addition, no assessment seems to have been done on ecological receptors, however this could be potentially scoped out.
- 6.2. Subject to further information and clarification, the information and assessments presented in Chapter 14 of the PIER appear to be reasonable and the findings and approach consistent with what would be expected for a proposed development of this nature
- 6.3. In terms of contamination Chapter 10 of the PEIR covers Geology & Hydrogeology. It is necessary to consider the potential effects of the project on human health in respect of ground contamination of controlled water receptors.
- 6.4. The PEIR explains that the risks from potential land contamination are at worst low/medium provided good practice is followed, this includes impacts on groundwater. The approach is described in the PIER is consistent with current guidance and its conclusions reasonable, but there are some limitations in relation to the transparency, completeness and clarity of the data and assessments.

- 6.5. There are a number of private water supplies (PWS) within the study area in Braintree District. The PIER explains that further assessment will be presented in the Environmental Statement in respect the effect on groundwater quality, including the potential for the proposed development to introduce new contaminants through the subsurface or to provide transport pathways for existing contamination. It has also been noted in our response that groundwater levels can often be under 1m whereas the PIER says that groundwater is unlikely to be encountered at this depth.
- 6.6. The information and assessment in this chapter appear to be reasonable and the findings and approach is consistent with what is expected for a proposed development like this. Some further information and clarification are required to verify the accuracy of the assessment outcomes.
- 6.7. Braintree District has previously submitted comments on Air Quality at the EIA screen phase of this proposal. These comments are reiterated that for air quality it is agreed that there should be no significant potential for releases to air at the operational stage and the construction phase will be assessed in accordance with IAQM guidance which is appropriate.

7. Cumulative Effects

- 7.1. BDC would first refer NG back to the Scoping comments made previously by BDC (dated 8th June 2021) in relation to Cumulative Effects. Other comments have also been made regarding cumulative effects from the various specialisms within this letter to the PEIR. Those comments not be repeated again here but should be taken into consideration.
- 7.2. BDC acknowledge that other NSIP projects within 50km of the site are to be included within the long list as requested. This is welcomed owing to the potential significant impact of other NSIP projects in the region.
- 7.3. Of these other projects, the East Anglia Green project is a particular concern with regard to cumulative effects with the B2T project, as the route corridor is likely to go through part of Braintree District and neighbouring authorities between Norwich and Tilbury at similar times. While the proposed route corridor is yet to be consulted on, BDC expect the ES for the B2T project to undertake a comprehensive cumulative impact assessment between the two projects. Some assumptions have been made within the PEIR document of this project, however by the time the ES is submitted further information should be available.
- 7.4. It is noted that the Planning Inspectorate considered quantitative modelling could be used to inform the Environmental Statement, but that NG feels that this is disproportionate owing to the impacts of the development (and instead use a qualitative approach). While BDC do not have an objection in principle to a qualitative approach, BDC consider that justification should be provided within each relevant section as to why a qualitative approach has been employed for access, opposed to a quantitative approach. If limited information is the reason, further justification should be required as to why this could not be found/sought.

8. Geology and Hydrogeology, Agriculture and Soils, Major Accidents and Disasters & Traffic and Transport

- 8.1. It should be noted that BDC are not the statutory function holders for these topic areas. As such, Braintree District Council would defer to Essex County Councils response on these matters.

9. Summary

- 9.1. I trust this letter adequately provides Braintree District Council's views on the Statutory Consultation including the PEIR report. This consultation response is made with regard to the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) and does not prejudice the Braintree District Council's consideration of the other planning matters relating to the development of this site.

Yours Sincerely,

**Mathew Wilde MRTPI (Senior Planner)
for Planning Development Manager**

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County Hall, Chelmsford
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T: 0333 013 6840
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FAO: Mathew Wilde, Senior Planner
Braintree District Council



Ref: Statutory Consultation
Date: 03/03/2022

BUILT HERITAGE ADVICE

Dear Sir / Madam,

RE: Statutory Consultation, Bramford to Twinsted Tee 400Kv Connection

The following advice relates to the Bramford to Twinstead Statutory Consultation, which is currently underway, running from 25th January to 21st March 2022. The Statutory Consultation follows the submission of a Scoping Report, which comments were also provided by myself, an employee of Place Services working on behalf of Braintree District Council. This letter identifies areas of concern in relation to the impacts of the scheme upon built heritage assets within the county of Essex which fall within Braintree District Council's administrative boundary.

A description of the proposals is as follows:

NGET proposes to reinforce the electricity 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 400 kilovolt (kV) electricity transmission line over a distance of approximately 29 km.

The reinforcement would comprise approximately 19 km of overhead line (consisting of approximately 55 new pylons and conductors) and 10 km of underground cable system (consisting of 20 cables with associated joint bays and above ground link pillars).

Four cable sealing end compounds would be required to facilitate the transition between the overhead and underground cable technology.

It is proposed that approximately 27.5 km of existing overhead line and associated pylons would be removed as part of the proposals (25 km of existing 132 kV overhead line between Burstall Bridge and Twinstead Tee, and 2.5 km of the existing 400 kV overhead line to the south of Twinstead Tee). To facilitate the overhead line removal, a new grid supply point substation is required at Butler's Wood, east of Wickham St Paul, in Essex.

Two options are proposed for the new 400 kV overhead line in the vicinity of Hintlesham Woods. Option 1 would utilise the alignment and pylons of the exiting 400kV overhead line through the woods, whilst the existing 400kV overhead line would be re-routed to the north and west of Hintlesham Woods. Option 2 would parallel the existing 400kV overhead line to the south, with pylons located outside of the woodland and the conductors crossing the woods.

Built heritage assets within the administrative boundaries of Braintree District Council which will be affected by the proposals were identified as part of the Primary Environmental Information Report

(PEIR) which forms part of the documents prepared for this public consultation. Section 8 of the PEIR relates to the Historic Environment, with Built Heritage Assets identified in Appendix 8.1, shown in Figure 8.1.

I largely agree with the statements provided within the PEIR relating to built heritage assets, namely: no direct impact is anticipated to identified built heritage assets, with no works occurring to their fabric, however there will be a change to their setting which could result in harm to their significance. As stated in my previous response, due consideration should also be given to potential indirect effects upon these buildings during the works, caused by vibrations, noise or other construction related activities. Sections 8.6.6 -8.6.13 of the PEIR are reassuring, suggesting that the potential impact of the construction phase would not result in any permanent physical harm to any built heritage assets. It is also reassuring to read in section 8.6.12 that buildings in particular proximity to the draft order limits/ZTV will be assessed further, to understand the potential impact of the proposals on the settings and physical fabric of these buildings.

The potential for non-designated built heritage assets to be affected by the works remains high. Within the next stages of the scheme, a thorough survey must be undertaken to identify any non-designated buildings of heritage interest which will be affected by the scheme, through a change to their setting. This should have been addressed within sections 8.6.14 - 8.6.20, as per Table 8.2, ID 4.3.6 and ID 4.3.10. I understand that no demolition of existing structures or buildings will occur as part of the proposed network upgrade, however this should be clarified, particularly in the areas where the cabling will be routed underground.

A feedback form was provided by NGES, my comments below follow the format provided within the feedback form, answering the relevant questions.

- 1) Support. The plans to use a mixture of both overhead lines and underground cables can be supported if the justification is provided, using the most appropriate method for each section of the network.
- 2) For the purpose of this letter, which relates to areas within the county of Essex only, Sections G and H are relevant.
- 3) The letter is provided on behalf of Braintree District Council.
- 4) Concerns are: disruption to land use, removal of vegetation, the potential to encounter archaeology or historic features, traffic and transportation, noise.
- 5) National Grid have listened to feedback, but further change and additional assessments are required.
- 6) Neither agree nor disagree.
- 13) Removing more of the existing 400 kV overhead line: Agree, this would be beneficial, helping to partially reinstate the historic appearance of the landscape. Relocating Stour Valley West cable sealing end compound: neither agree nor disagree. No comments, the relocation will not affect any built heritage assets. New alignment for the reinforcement through the Stour Valley: Neither agree nor disagree.
- 14) More assessment needs to be conducted regarding the impact the route will have upon the setting of heritage assets, in line with the following comments in answer to question 15.
- 15) As plans relating to the new GSP substation between Butler's and Wldegrave Woods progress, a thorough assessment should be undertaken regarding how the plans will affect the setting of surrounding heritage assets, in particular: Butler's Hall Farm (a Grade II* building, 1169693, north west of the proposed substation), Nether House Farm (Grade II, 1123031, south of the proposed substation) the cluster of buildings at Gentry's farm (north east of the proposed substation). The

potential impact upon these assets is outlined within the PEIR document, however further expansion of the points raised and justification or the conclusions made should be provided.

The assessment of the impact of the scheme should adhere to the staged approach to decision-making in applications affecting heritage assets, described in the relevant guidance from Historic England, Statements of Heritage Significance: Analysing Significance in Heritage Assets (Advice Note 12). In addition, the Historic Guidance on setting should be used (the Setting of Heritage Assets Planning Note 3 Second Edition). The methodology for assessment and the rationale behind the choice of study area should also be presented within the document. Should there be found to be a visual impact of the scheme on the significance of the heritage assets, proposals for mitigation should be considered, including screening or landscaping. These could potentially be important elements which effectively reduce the visual impact of the scheme to a suitable level.

Due to the proposed creation of a new 132kV underground cable south of the substation, thorough assessment of the potential effects of this work upon the structure of Nether House Farm should also be considered. Timber framed, Nether House Farm is a four-hundred-year-old building (if not older) which could suffer severe damage as the result of vibrations, disruption to surrounding land levels and changes to the water level in its surroundings. I would expect a complete risk assessment is conducted for the works, identifying any potentially negative consequences of the build upon the listed building.

Similarly, the proposed route of the new 400kV cable in this area will be within the setting of the Grade II* Church of All Saints (list entry number: 1168870) and Grade II Wickham Hall (list entry number: 1338001). Clearer maps need to be provided which outline the proximity of these cables to the listed buildings, as well as an assessment of any physical effects or alterations to the setting of these buildings.

It is expected that other designated buildings not exclusively identified within the PEIR should also be assessed to understand the impact of construction upon their setting and physical fabric. These include Netherby and Adjoining Cottage (Grade II, list entry number 1306791) and listed buildings within the village of Wickham St Paul, identified on Figure 8.1 of the document (page 4 of 9).

- 16) Any environmental mitigation and enhancement should consider the setting of listed buildings, the significance of many of which are tied to their location within a rural setting. Mitigation schemes should seek to maintain wide views across arable landscapes, new sections of dense planting or woodland could have a negative affect upon how listed buildings are perceived within the wider landscape. This is particularly important in the case of any landmark or waymarker buildings, such as churches, which were designed to be seen from a long distance.

To conclude, at this stage a great deal of information regarding the impact of the proposals upon built heritage remains to be provided. However, should the subsequent stages of the process follow the stages outlined in the PEIR document, I trust that this work will be conducted in due course.

Yours sincerely,

Laura Johnson
Historic Environment Team
Place Services

Note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter

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Bramford to Twinstead Preliminary Environmental Report

Comments in relation to Archaeology within PEIR Vol 1 Main report

The proposed development between Bramford and Twinsted will require the construction of 55 new pylons and approximately 10 km of underground cables, along with 4 cable end sealing end compounds and a new grid supply point sub station at Butlers Wood. The impact on the archaeological deposits are dealt with in chapter 8 (Historic Environment) within the main Preliminary Environment report Vol 1 supported by Appendix 8.2 Archaeological Framework Strategy.

The most significant impact to archaeological deposits is likely to be the undergrounding sections where the working width of 100m is the equivalent of a six lane highway be excavated in 2 main sections with a total length of c. 10km. The nature of the development within this corridor will have the impact of damaging/destroying those deposits present. Because of this level of impact, the completion of an appropriate level of evaluation is essential to understand the impact of the development for the ES.

Chapter 8 Historic Environment

8.5.18 There is concern that the ES will be too reliant on geophysical survey. In the majority of cases where geophysics is used there is uncertainty of results until the areas have been ground truthed by trial trenching. To avoid significant archaeological deposits being missed or their significance not identified until a later date, it has been recommended that a programme of trial trenching should occur on as much of the below grounding. This is to provide an understanding of the extent and significance of the deposits present, identify opportunities to minimise impact on those significant deposits present and to be able to design the mitigation for a meaningful archaeological strategy. It will also inform project timescales and implications that may be relevant for other ES topic areas.

8.5.21 There is concern that the interpretation of the majority of the non-designated assets is defined as negligible to low. Further assessment should be considered on those assets directly

impacted by the development, where mitigation of assets identified as of local and regional interest would likely be appropriate.

8.6.5 The good practice measures should extend to known archaeological sites being protected by appropriate fencing, matting, reduction of corridor width etc

8.6.7 The completion of a palaeo-environmental evaluation within the valley is particularly important as if heritage assets are identified there will be a high potential of waterlogged deposits being present and as such the deposits are likely to be of medium to high significance. It is stated within other matters in this document that this work is being completed.

8.6.18 The impact of the removal of hedgerows etc on protected lanes or historic hedgerows themselves should be assessed within the ES, which should establish if directional drilling is an alternative to the damage or destruction of a heritage asset. This would only be relevant where there is a direct impact on the protected lane or hedgerow

8.6.48 In the original proposal in 2012 there were discussions regarding the need to straighten lengths of lane to facilitate access for large lorries. It is unclear if this still the case in the present application.

8.6.60; The impact on the protected lane is described as being not significant, however, as this protected lane is describing as providing access to the CSE compound the impact of the increase of traffic and type of traffic needs to be considered, not just the impact on the setting of the lane.

8.6.75 It is pleasing to see that the impact to the non-designated archaeological remains is identified as a key impact, however, this summary does not clarify the serious impact this will have. This development will damage or destroy any archaeological deposits within the undergrounding section of the application.

Volume 2 Appendices

Appendix 4.1 Outline CoCP

The outline Code of Construction Practice needs to link to the Archaeological Framework Strategy and the proposed WSI's from the archaeological contractors working on site. It is recommended that separate sections should be added into the CoCP to deal with this.

HO2 should be off-set by appropriate archaeological evaluation undertaken in advance of construction although there is still the potential this could happen.

A separate point should be included stating that each of the archaeological areas will be signed off by the Local Authority archaeologist prior to construction commencing.

The above comments on the outline CoCP should be linked into the CEMP as it is developed.

Appendix 8.2 Archaeological Framework Strategy

It is understood that this document has recently been updated, however, the revised version has not been included here or seen by the specialists. The following comments relate to the submitted Archaeological Framework Strategy as part of the PEIR appendices.

Under 1.3.4, open area excavation should be included in this section as this will form the most appropriate method to record the sites identified through the initial DBA, geophysics and trial trenching.

2.4 Walk over survey. Considering it is 8 years since the last walk over survey it should be considered whether there would have been changes in this period. Are other assessments such as google earth being used to assess changing landscape uses since the original walkover.

2.5 Geoarchaeological and palaeoenvironmental survey. There should be consideration for targeted bore holes by Geoarchaeological and palaeoenvironmental specialists with the potential for C14 dates to support any future mitigation strategies on these deposits once the present draft results are received.

2.5.3 Deposit models across the two valley floors will be important to define potential locations for waterlogged deposits as well as higher ground suitable for settlement.

2.6 Archaeological Trial Trenching : Throughout the discussions on this scheme trial trenching in the underground section has been recommended to support the ES. Without a considerable proportion of the trial trenching completed for the ES the applicants will not have a full understanding of the significance of the archaeological deposits present or the impact of the scheme and thus will not be able to prepare a detailed mitigation strategy.

3.3. Archaeological Work: As stated above (1.3.4) it is essential that a section is included here on open area excavation as this is likely to be the most frequent method used to preserve archaeological deposits by record if the scheme is appropriately assessed. Strip Map and Sample should be used on those areas with widely dispersed features where no defined concentrations of features have been identified. If the evaluation is completed to an appropriate standard the excavation and SMS should be sufficient to mitigate those deposits that are threatened by the scheme.

3.4 Archaeological Watching brief: If the evaluation has been completed to a good enough standard it should facilitate the majority of areas with no archaeology being signed off prior to construction and allow the creation of a mitigation strategy which will minimise any archaeological work during the construction programme.

5- Post Excavation, Publication and Archive Deposition. The Eastern region has the East Anglian Archaeology monograph series which would be an appropriate route for publication for a scheme such as this which is likely to identify, and impact known and unknown archaeology. This should at least be identified as a potential route for publication. There should also be a clear section on the potential for outreach, considering the landscape this development is planning to cut through there will be significant interest in the results.

Yours sincerely

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NOTE : This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter



28/02/2022

Bramford to Twinstead
Preliminary Environmental Information Report
Issue number: BT-JAC-020631-560-0007 (Jan 2022)

Thank you for consulting Place Services on the PEIR for this NSIP.

Volume 1 Main Report

We have reviewed the PEIR and its appendices and figures welcome the amendments that have been made to the Biodiversity chapter of the PEIR, since the EIA Scoping Opinion consultation.

This includes the inclusion of the Technical Guidance Note 02-21: Assessing landscape value outside national designations (May 2021).

Document Ref	Topic	Comment
Chapter 4 Para 4.4.42	Underground cables and hedgerows	We note that where the proposed underground cables would cross a hedgerow, it is assumed that the working area would be 80m to undertake the works. We welcome the statement at further design work will be undertaken to consider if this could be reduced to 50m in particularly sensitive locations. Construction would include removal of the hedgerow and the roots to allow excavation of the cable trenches and haul route. Once construction is complete, we note that the hedgerow gap would be replanted with shallow rooting hedgerow species which we recommend should be appropriate native species.
Table 4.2: Preliminary Environmental Areas Identified for Mitigation and Enhancement: ENV14 GSP Substation	GSP Substation Mitigation measures	We welcome the proposed enhancement woodland planting at the GSP substation to be sited between Butler's Wood and Waldegrave Wood, both of which are ancient woodland and Essex LoWS. We share our landscape colleague's comments for discussion on design and choice of species etc with other disciplines to inform a shared design for new woodland.
Chapter 7 Para 7.1.1 and Appendix 7.1 Para 1.1.3 and sections 5-15	Non-significant impacts to protected and priority species and habitats, and appropriate mitigation and compensation measures	We note that the Inspectorate scoped in impacts on Priority habitats for assessment in the EIA and Para 7.1.1 now includes reference to Priority habitats. Although Priority species were scoped out of the ES, we note this has been included in the glossary and stated in Table 3.5 that the ES will report on likely significant effects. We highlight that all non-significant effects on Priority habitats and species <u>will also be needed</u> in a non-EIA Provide no-EIA chapter or Addendum for non-significant impacts so that all the LPAs and SoS can demonstrate their s40 biodiversity duty.

		<p>Paragraph 5.3.3. of NPS EN-1 states, “Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance on protected species and on habitats and other species of principal importance for the conservation of biodiversity”</p> <p>Notable has a very specific definition which does not match the status of Priority species so any use of notable species needs to be clarified in the glossary to avoid being confusing.</p>
Para 7.5.2-7.5.4	Non-statutory designated sites	As included in comments at Scoping stage, please note that these sites in Essex should be referenced as LoWS.
Para 7.3.4 and Table 7.2	European Protected Species (Great Crested Newt, Dormouse & bats	<p>We welcome confirmation that National Grid has agree with Natural England to apply to District Level Licensing for Gt crested newt (GCN) instead of surveys and that a countersigned IACPC will be needed to support the DCO. We acknowledge that GCN are therefore now scoped out from further assessment in the ES.</p> <p>However, as indicate in our EIA scoping comments, it is expected that best practice methodology will be used to mitigate for potential impacts on other mobile species, such as Priority amphibians, reptiles and hedgehog, during the construction phase.</p> <p>We welcome the inclusion of LAs and Essex & Suffolk Dormouse Group in consultation on survey methodology and note that existing baseline data will be used to create a Habitat Suitability Map based on presence/absence records of bats. We note the baseline for bat data (Figure 7.7b) but highlight that an absence of records is not a record of absence so the HSM will need scrutiny to deliver an appropriate level of information for route choice and mitigation needed to minimise impacts.</p> <p>Based on experience from other linear projects, we suggest that where hedge crossings or removals are necessary to retain connectivity during construction, an alternative to dead hedging (referenced in the outline CoCP measure B07) is the use of Heras fencing with camouflage netting attached. We can provide more information on request. This temporary measure will be needed to enable Barbastelle bats to continue to use their network of hedgerows.</p>
Para 7.3.7	Biodiversity Net Gain and Natural Capital benefits	We note that there is a requirement included in the Ofgem RIIO-2 determination under the incentives to deliver Net Gain and other Natural Capital benefits to enhance biodiversity and natural capital. We would therefore welcome confirmation that these targets will be met for this project. We note that the Government’s biodiversity metric will be used and seek feedback on the evaluation process to deliver natural capital benefits – clarification on whether the project will be using National Grid’s own evaluation process or a similar metric would be helpful.

Other matters

We highlight that more information is needed to understand the impacts on hedgerows along the route, particular those that could be important for bat foraging and commuting routes for Barbastelle bats. We seek to inform choices on species options for restoration planting schemes as well as securing temporary mitigation measures during construction.

If you have any queries regarding the above matters, please contact me.

Best wishes

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal Ecological Consultant

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



28/02/2022

**Bramford to Twinstead
 Preliminary Environmental Information Report
 Issue number: BT-JAC-020631-560-0007**

Thank you for consulting Place Services on the above report. As per the agreed timescale, our comments on the Planning Application as submitted are provided below:

Document Ref	Topic	Comment
Volume 1 Main Report		
Page 92	Methodology	We accept the categories of landscape and visual receptors to be included in the assessment.
Page 92	Methodology	We welcome the amendments that have been made to the Landscape and Visual Impact Assessment methodology since the EIA Scoping Opinion consultation. This includes the inclusion of the Technical Guidance Note 02-21: Assessing landscape value outside national designations (May 2021).
Table 3.4: Landscape and Visual Non-statutory Consultation	Assessment of effects	The Table makes reference to combined and sequential effects and how they will be considered within the ES as part of the landscape and visual assessment. However, this has not been reflected in the PEIR and we hope this comes forward soon in the assessment process.
Table 6.1: Summary of Aspects Scoped In/Out Based on Scoping Opinion	Night-time effects (construction and operation)	The Scoping Report and Planning Inspectorate report (ID 4.1.2) advise that lighting will be scoped out on the Environmental Statement. We are still of the judgement that given we are yet to receive information regarding the size and location of any construction laydown/compound areas, and the operating hours of these, night-time effects should be scoped in.
Para 3.3.4-5 Table 6.2: Other Matters from the Scoping Opinion	Stour Valley Project Area	<p>It is National Grids intention that if there is no change to the AONB boundary, the Stour Valley (or parts of it) will be considered as forming part of the setting of the AONB and the Stour Valley Special Landscape Area (SLA).</p> <p>Though this position has been agreed with Natural England, this stance is not supported, and we would agree with the Inspectorate (ID 4.1.13) in that the Stour Valley Project Area (AONB extension area) has already been identified as having a particular value and an important role in the setting of the Dedham Vale AONB that is distinct from its SLA designation. As such, the ES should include sensitivity testing against the Stour Valley Project Area as a landscape designation, separate to that of the Stour Valley SLA.</p>

		<p>We agree that it is not known which parts of the Stour Valley may become part of the Dedham Vale AONB in the future. However, we know that the Stour Valley Project Area has been subject to 5-year management plans endorsed by the LPA and has been under careful assessment and scrutiny (Valued Landscape Assessment Stour Valley Project Area (March 2020)) that has identified the distinct qualities it features and therefore meets criteria beyond that of the SLA designation.</p>
<p>Landscape and Visual Non-statutory Consultation Table 3.4</p> <p>Appendix 6.1 Landscape and Visual Baseline</p>	Dedham Vale AONB and Stour Valley	<p>Reference has been made to the Dedham Vale AONB and Stour Valley Management Plan, which is welcomed. However, there are also other reference/guidance documents that need to be considered and used as part of the assessment. This includes:</p> <ul style="list-style-type: none"> - Dedham Vale AONB Natural Beauty and Special Qualities and Perceived and Anticipated Risks (July 2016) - Managing a Masterpiece Evaluation Report (Dec 2013) - Valued Landscape Assessment Stour Valley Project Area (March 2020)
Para 6.6.102	CSE Compounds - views	<p>Based on the supporting information provided at this stage of the process we do not contest the judgements made on visual effects from CSE compounds such as the proposed Dedham Vale East CSE compound and Stour Valley East CSE compound and would welcome the opportunity to explore the potential for additional off-site planting.</p>
6.6.144 Underground cables landscape and visual effects during operation	Underground cable – replanting	<p>The PEIR has judged that landscape and visual effects may arise because trees cannot be planted to replace those removed during construction if the replacement planting is above or close to the underground cables. Though there is an assumption that hedgerows could be replanted broadly perpendicular across cables, therefore the effects are judged as likely to not be significant.</p> <p>However, we are still of the judgement that given we are yet to receive information regarding the impacts on hedgerows and trees, the alignment of the cables in relation to hedgerows and the required easement areas and species restrictions, we don't have confidence that a 'not significant' effect can be determined at this stage, especially in regard to effects on landscape character and designations</p>
6.6.158	GSP Substation	<p>Though we agree with the judgement that landscape effects during operation will not be significant. The assessment also states that "these minor changes would not affect landscape character". This is not correct, as there will be a degree of harm, just not at the magnitude to be classified as significant.</p> <p>As an alternative, we would advise the assessment refers to significance of effect criteria and definitions within the report to ensure the judgements are not misinterpreted.</p>
Table 4.2: Preliminary Environmental Areas Identified for	GSP Substation Mitigation measures	<p>The GSP substation is situated between Butler's Wood and Waldegrave Wood, both of which are ancient woodland and Essex CWS. Reference is made to enhancement planting that could provide an opportunity to reconnect the two woodlands. This is supported, and we would advise that a review of historical</p>

Mitigation and Enhancement: ENV14 GSP Substation		field patterns and local native species is undertaken to see how this can be considered as part of future landscape designs.
Table 3.6: Historic Environment Consultation		<p>We are still awaiting details in regard to impacts on hedgerows, particular those that could be deemed 'important hedgerows' under the Hedgerows Regulations 1997 (both in terms of wildlife and landscape, as well as archaeology and history) and how this would impact effects on landscape character and designations.</p> <p>This information is also integral as it can go on to inform species options for restoration planting schemes, which may need to differ given the restrictive options available above underground cables.</p>

If you have any queries regarding the above matters, please do not hesitate to contact me.

Kind Regards,

Ryan Mills BSc (Hons) MSc CMLI
Senior Landscape Consultant

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Technical Note

CLIENT:	Braintree District Council
PROJECT:	Bramford to Twinstead Nationally Significant Infrastructure Project: Environmental Health Support
SUBJECT:	Review Comments on Chapter 14 (Noise and Vibration) of the National Grid Bramford to Twinstead Preliminary Environmental Information Report (PEIR)
JOB NO.:	GM11845
DATE:	3 March 2022
PREPARED BY:	Richard Calvert
APPROVED BY:	Simon Urquhart

1. INTRODUCTION AND BACKGROUND

- 1.1 These review comments relate to Chapter 14 (Noise and Vibration) of *Bramford to Twinstead: Preliminary Environmental Information Report (National Grid, 2022)* and the accompanying appendices and figures of that report that are relevant to this chapter. These documents are subsequently referred to in these review comments as “the PEIR”.
- 1.2 In brief, the proposed development comprises the replacement of the existing electricity 132kV cable between Bramford and Twinstead to increase the capacity on the network. In 2013 a number of public consultations were undertaken for a similar scheme proposed by NG, this was subsequently placed on hold.
- 1.3 Due to changes to the infrastructure for the NG, there is now a requirement to re-introduce the project. Therefore, a Preliminary Environmental Information Report (PEIR) has been prepared by NG to assess the potential impacts of the scheme at receptors, dated January 2022. This 2022 PEIR has been reviewed in terms of noise (Chapter 14) with the findings of the review presented herein.

2. COMMENTS ON THE PEIR CHAPTER

- 2.1 As stated above, the scheme is 29km length of the scheme, however, for the purposes of this review and document we have considered only the western part of the scheme which falls within the jurisdiction of BDC. The relevant western boundary of BDC is dictated by the River Stour.

Methodology

- 2.2 Chapter 14 of the PEIR sets out the works which have been scoped in and out of the assessment. These views are based partly upon the opinions of the Planning Inspectorate (PI) on behalf of the Secretary

of State. Exact details of the opinion of the PI have not been provided and are assumed to have been correctly interpreted and applied.

- 2.3 The PEIR states that several potential adverse noise and vibration effects have been scoped out of the assessment. Details of what has been included in the assessment, including our opinions, are shown below in Table 1.

Table 1: Details of Impacts Scoped in/out				
Receptor	Proposed Matter	Scoped in/out	Summary of NG Comments	Wardell Armstrong Comments
Noise sensitive receptor	Existing road traffic noise	Scoped Out	PI agrees that existing road traffic can be scoped out	Agreed
Noise & vibration sensitive receptors	Construction effects	Scoped In	Possible effects	Agreed
Vibration sensitive receptors	Construction traffic	Scoped Out	Vibration from construction traffic expected to be low	Agreed
Vibration sensitive receptors	Baseline vibration	Scoped Out	PI agrees that a vibration study is not required	Agreed
Noise sensitive receptor	Operational noise	Scoped Out	Embedded noise control measures from the operational stage. PI agrees that it can be scoped out.	Details of the embedded noise mitigation is scarce; we would expect to see some consideration of operational noise from electrical substations.
Ecological receptors	Operational noise	Scoped Out	Impacts have not been fully quantified, but should be scoped out	Agreed
Noise sensitive receptor	Operational noise associated with maintenance	Scoped Out	Minimal maintenance will need to be carried out	Agreed
Vibration sensitive receptors	Operational vibration	Scoped Out		Agreed
Ecological Receptors	Operational Vibration	Scoped Out	Scoped in	This has not been done, but the text could be a typographical error. We would agree that the potential impact could be scoped out

- 2.4 Therefore, on the whole, we agree with the scope of the assessment.

Identification of the Baseline Conditions

- 2.5 The PEIR identifies that the baseline conditions were established in 2013 as part of the previous scheme design. The 2013 data established that the baseline noise level at receptors is generally low.
- 2.6 We would normally suggest that baseline data has a shelf life of 2-3 years. However, in this case it is only necessary to establish the construction phase noise limit. *BS5228-1:2009+A1:2014 - Code of practice for noise and vibration control on construction and open sites – Part 1: Noise* (BS5228) identifies that where the ambient sound level is less than 65dB(A) then the construction phase noise limit should be 65dB(A). This is the lowest daytime construction phase noise limit level.
- 2.7 Therefore, there is only a requirement to determine if the existing ambient sound level at receptors is below 65dB(A) for the construction phase assessment. It is stated in the PEIR (and agreed) that most receptors are in a rural area, and therefore, the noise level at receptors is considered to be less than 65dB(A). Therefore, the 2013 baseline data is considered appropriate to support this assessment.

Assessment of Construction Phase Noise and Vibration Effects

- 2.8 Chapter 14 of the PEIR considers construction phase noise and vibration at existing sensitive receptors. The adverse effect of construction noise has been determined through a calculation of construction related noise at receptors, which is shown in detail in Appendix 14.1. These construction phase noise calculations have been compared with the construction phase noise criteria which is identified in the Scoping Report. This calculation methodology is in accordance with BS5228, which is the appropriate technical document.
- 2.9 The calculation methodology considers each phase of the construction works, and includes each item of plant/equipment, approximate on-times, and any noise screening. The calculation assumes that fixed plant will be screened from each receptor.
- 2.10 The effects are shown in their simplest form in the PEIR, on Page 3 of Figure 14.1. Figure 14.1 shows areas of Significant Adverse Effect in the long and short term.
- 2.11 Page 3 of Figure 14.1 identifies four areas where receptors which are likely to be significantly adversely affected by construction noise in the short-term (light green areas). Long term effects are shown as areas of dark green on the image, and no receptors are located within these areas.
- 2.12 The receptors effected by a short-term effect have been identified with pink circles in Figure 1 below.

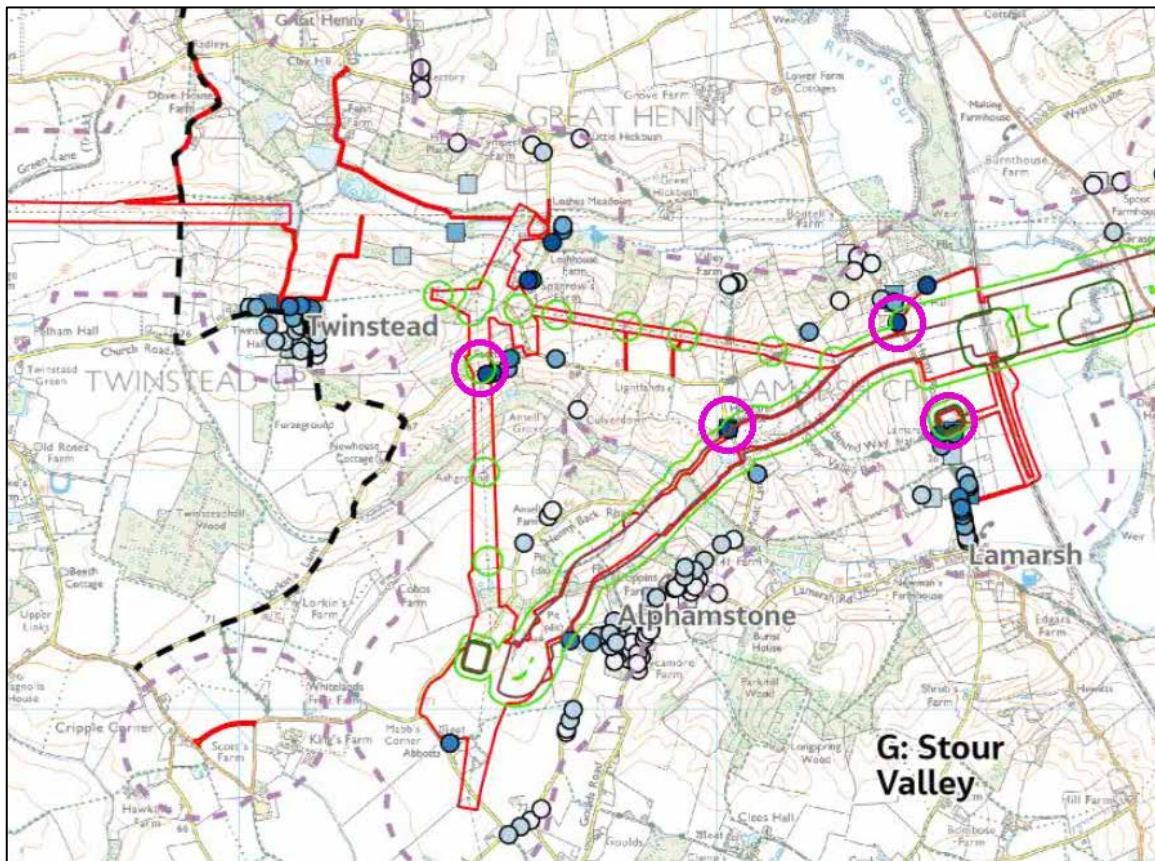


Figure 1 – Identification of Significant Adverse Effects

2.13 Construction phase vibration has not been considered in detail in the PIER, and calculations have not been shown. The PIER acknowledges that a significant adverse effect would be experienced within 70m of piling activities. However, the PEIR identifies that there are no receptors within 100m of proposed pylon locations.

2.14 The scoping report sets out the determination of a significant impacts and states that a moderate or major effect will be experienced where vibration is equal or greater than 10mm/s and for 10 or more days/nights in any consecutive 15 days or nights: or, for a total of 40 days in any 6 months.

2.15 BS5228 suggests that a vibration level of 10mm/s would be intolerable for any more than a brief period.

Assessment Conclusions

2.16 The assessment in the PEIR concludes that there are no likely significant residual effects to noise and vibration during the construction and operational phase.

Limitations and Concerns to the PIER

2.17 It is understood that baseline data has been captured in 2013. However, for clarity, we would like to have sight of this data. The measured noise levels should be summarised and included in the

Environmental Statement or Development Consent application. In addition, the locations of the noise measurement position, and data set should be made available as Appendices and Figures.

- 2.18 Construction phase noise has been assessed at receptors, with calculations carried out in accordance with BS5228. The calculations include fixed and mobile plant. It is noted that fixed plant such as generators have an 'on-time' of 90%. However, typically generators would be left on continuously during the operational times of the construction works. Therefore, the calculations should be revised with the on-time set to 100%, to ensure the calculations are robust. Further, a reduction for noise screening has been applied to the majority of fixed plant, however, our experience of construction sites shows that noise screening measures are not typically well installed and maintained.
- 2.19 The PIER states that Best Available Technique (BAT) will be employed. However, further details of how the screening will be maintained, moved, and positioned would be beneficial.
- 2.20 Vibration from the construction phase does not appear to have been fully assessed. We are in agreement that much of the works will not present significant vibration, with only vibration from piling activities thought likely to cause a problem at receptors. Piling is expected to be required for the construction of the pylons and has been identified in the PIER to not cause a significant adverse effect at receptors. However, the criteria to determine a significant adverse effect is thought to be too high, and the significance of affect should be re-considered with lower threshold level for a significant effect.
- 2.21 The scheme includes electricity substations and emergency diesel generators. However, noise from the operation of this equipment has not been assessed in sufficient detail at receptors. We would expect to see further details of the embedded noise mitigation, and a consideration of operational phase noise.
- 2.22 There are some receptors which will be significantly adversely affected in the short term. This is not made clear in the PEIR, mitigation and BAT does not appear to have been considered. We would advise that the impact at these receptors is considered in more detail, with BAT and mitigation deployed as required.

3. SUMMARY

- 3.1 The information and assessments presented in Chapter 14 of the PEIR appear to be reasonable and the findings and approach consistent with what would be expected for a proposed development of this nature. However, in some cases further information and clarification is required, to provide transparency and completeness in the baseline characterisation and assessment process, and to verify the accuracy of the assessment outcomes. We look forward to receipt of this information in the Environmental Statement, and would be pleased to discuss any of these points with the Applicant in advance.

Technical Note



CLIENT:	Braintree District Council
PROJECT:	Bramford to Twinstead Nationally Significant Infrastructure Project: Environmental Health Support
SUBJECT:	Review Comments on Chapter 10 (Geology & Hydrogeology) of the National Grid Bramford to Twinstead Preliminary Environmental Information Report (PEIR)
JOB NO.:	GM11845
DATE:	3 March 2022
PREPARED BY:	Matt Woodcock
APPROVED BY:	Gavin Campbell

1. INTRODUCTION AND BACKGROUND

- 1.1 These review comments relate to Chapter 10 (Geology & Hydrogeology) of *Bramford to Twinstead: Preliminary Environmental Information Report (National Grid, 2022)* and the accompanying appendices and figures of that report that are relevant to this chapter. These documents are subsequently referred to in these review comments as “the PEIR chapter”.
- 1.2 The PEIR chapter considers the potential effects of the Project in relation to human health, Controlled Waters receptors, and mineral sterilisation. Our comments below are restricted to the aspects of the PEIR chapter that relate to the effects on human health from ground contamination and effects on private water supplies (PWS). Other matters that are discussed within the PEIR chapter, such as Controlled Waters receptors (other than PWS) and minerals receptors, are regulated by consultees other than Braintree DC.
- 1.3 The PEIR chapter characterises the geology & hydrogeology baseline conditions by using desk study information and limited ground investigation data. The data sets used include (amongst others) Phase 1 Environmental Studies undertaken by RSK in 2013, a Geotechnical Site Investigation report prepared by Cat Surveys Group Ltd in 2013, and Local Authority records of potentially contaminated sites. The baseline conditions are summarised in Appendix 10.1 of the PEIR.
- 1.4 The PEIR chapter explains that the risks from potential land contamination are, at worst, low/moderate. The assessments in the chapter conclude that, with appropriate good practice during construction, the risk to human health resulting from the disturbance of soil contamination during construction would be negligible. The assessments of the effects of ground contamination on human health only consider construction / maintenance workers as a receptor. The assessments do not consider any potential effects on adjacent land users from the mobilisation of soil contamination during construction activities.

- 1.5 Similar to the human health assessments, the PEIR chapter concludes that, with appropriate good practice during construction, the effects of the proposed development on groundwater would also be negligible and not significant.
- 1.6 The PEIR chapter explains that the good practice measures that the assessments are reliant upon are described in the Outline Code of Construction Practice (Appendix 4.1 of the PEIR). This appendix in turn notes that further details of these measures will be provided in a Construction Environmental Management Plan (CEMP), an outline version of which will be submitted with the application for development consent.

2. COMMENTS ON THE PEIR CHAPTER

- 2.1 The approach that is described in the PEIR chapter appears to follow current guidance and the conclusions appear reasonable. However, in some cases there are limitations in relation to the transparency, completeness and clarity of the data and assessments. Where such limitations are present, we are unable to fully comment on the information and assessments. We recommend that these limitations are addressed as part of the Environmental Statement submission, with specific regard to the points noted below.

Baseline Data

- 2.2 The PEIR chapter contains only a brief summary of previous desk study and site investigation reports (in Appendix 10.1), rather than copies of the original reports. It is recommended that full copies of any baseline data reports and Tier 1 / Tier 2 risk assessments (as referred to in paragraph 10.4.10 of the PEIR) that are used to inform the assessment of the effects of the Project are included with the Environmental Statement. If use is made of data and reporting from 2013, then consideration should be given to the compliance of this with current guidance for contamination assessments.
- 2.3 Paragraph 10.4.2 of the PEIR chapter notes that information on “contaminated land sites” has been provided by the Local Authorities, and paragraph 10.5.21 and Figure 10.1 refer to these as “Registered Contaminated Land” sites. On a point of terminology, we request that, for the sites that fall within Braintree DC, these sites are referred to as ‘land with a potentially contaminative former use’ (or similar), to avoid confusion with statutorily designated Contaminated Land under Part IIA of the Environmental Protection Act 1990. We also wish to clarify that the information provided by Braintree DC about land with a potentially contaminative former use does not replace the need for the Applicant to undertake their own suitable research. The ordinary approach to this is to review published historical Ordnance Survey mapping for the draft Order Limits (and any appropriate surrounding Study Area). It is not clear whether the Applicant has done this in the course of preparing the PEIR chapter. We recommend that a review of historical mapping to identify potentially contaminative previous land uses is undertaken in support of the Environmental Statement, and that the findings of this exercise are shown on suitable figures i.e. showing the locations of any potentially contaminative land uses that are identified, cross referenced to their former land use on the legend to the figure.
- 2.4 It also recommended that the Environmental Statement ensures that a complete baseline is provided in relation to non-landfill waste sites (e.g. waste treatment sites) and registered historical pollution incidents. It is not clear whether these points have been considered when characterising the baseline

in the PEIR chapter, as they are not listed in Paragraph 10.4.2 and the supporting RSK desk study is absent.

- 2.5 Finally, we advise that the Local Geological Sites that are referred to in paragraph 10.5.1 of the PEIR chapter should be shown more clearly on the figures.

Private Water Supplies (PWS)

- 2.6 Figure 10.1 and Appendix 4.1 of the PEIR chapter indicate the presence of a number of PWS within the Study Area in Braintree DC, involving the abstraction of groundwater. Paragraphs 10.4.21 and 10.6.7 of the PEIR chapter explain that further assessment will be presented in the Environmental Statement in relation to the effects of the proposed development on aquifer (groundwater) quality, including in relation to the potential for the proposed development to introduce new contaminants to the subsurface or to provide transport pathways for existing contamination. It is recommended that the Environmental Statement specifically itemises how this further assessment has considered the potential effects on PWS, at the level of individual receptors where applicable (e.g. where/if sensitive receptors are close to activities that may introduce or affect the movement of contaminants in the subsurface). This level of detail is absent from the generalised assessments provided in the PEIR chapter.
- 2.7 The further assessment should also clarify that all PWS receptors have been considered, as within the PEIR chapter there seems to be a variance between the number of PWS listed within 1km of the draft Order Limits (five in the Braintree DC area listed in Table 4.2 of Appendix 4.1) and those shown on the corresponding figure (i.e. sixteen PWS shown within 1km of the draft Order Limits within Braintree DC on Figure 10.1).
- 2.8 Paragraph 10.5.17 states that “details of the groundwater encountered during the historical ground investigation are shown within Appendix 10.1: Geology and Hydrogeology Baseline. This shows that, even within low-lying valley areas, a trench depth of c.1m is unlikely to encounter groundwater”. However, Appendix 10.1 (Table 2.4) indicates that 4 out of 10 locations tested had a standing groundwater level that was shallower than 1m. It is also not stated what time of year this data was obtained (groundwater levels may vary seasonally), what the precise location of the data collection points was, and what the construction details of the investigation holes from which the water strike data was obtained was. It is recommended that these matters are clarified / considered further, as the assumption that groundwater will be deeper than 1m appears to be relevant to the assessment that PWS will not be significantly affected (e.g. paragraph 10.6.18 of the PEIR chapter).

Code of Construction Practice (CoCP)

- 2.9 The assessment outcomes that are presented in Chapter 10 of the PEIR chapter rely notably on general good practice measures. An outline of the proposed measures is presented in the CoCP. The CoCP in turn refers to an outline Construction Environmental Management Plan (CEMP), which will contain further details and is yet to be prepared. Without sight of the outline CEMP, it is not possible to comment fully on the assessments that are reliant on good practice measures. We look forward to receiving the outline CEMP as part of the development consent application. It is recommended that this should contain sufficient detail to support the assessments.

Sudbury Branch Railway Line ID23

- 2.10 Appendix 10.1 (Table 5.1) of the PEIR chapter assigns feature ID23 a “Local Authority Risk Rating” of “low”. However, the risk ratings provided by Braintree DC relate to the Local Authority’s site prioritisation under the Environmental Protection Act, so should not be confused with risk assessments that are required for development proposals under planning. The Applicant is advised to consider suitable desk study and (where available) site investigation information regarding feature ID23 to support an assessment of its contamination risk in the context of the development proposals. It is anticipated that this will include reasonable worst case assumptions about the ground conditions, in accordance with the approach explained in paragraph 10.4.15 of the PEIR chapter. It is noted that Appendix 10.1 (paragraph 2.2.3) states that the Sudbury Branch Rail Line is underlain by a “granular stratum” to up to 5.4m depth, but it is not clear whether this is Made Ground or whether it has been tested for contamination (and, if so, what the results were).

Health Risks to Adjacent Land Users

- 2.11 It is recommended that adjacent land users are considered as a receptor when assessing the potential risks to human health from the mobilisation of soil contamination by construction activities, in line with the Environment Agency’s Land Contamination Risk Management (LCRM) guidance.

Ground Gas Risks

- 2.12 The PEIR chapter does not make reference to potential risks from ground gas. Whilst this is unlikely to be a particular concern for a proposed development of this nature, the development does involve the construction of enclosed spaces that may have occasional manual access (a substation) and construction activities that could disturb ground gas (should there be any sources). It is recommended that information on ground gas risks is provided in the Environmental Statement, to the degree necessary to demonstrate that this matter has been considered in line with the LCRM guidance.

3. SUMMARY

- 3.1 The information and assessments presented in Chapter 10 of the PEIR appear to be reasonable and the findings and approach consistent with what would be expected for a proposed development of this nature. However, in some cases further information and clarification is required, to provide transparency and completeness in the baseline characterisation and assessment process, and to verify the accuracy of the assessment outcomes. We look forward to receipt of this information in the Environmental Statement, and would be pleased to discuss any of these points with the Applicant in advance.

Agenda Item: 7

Report to:	LOCAL PLAN SUB-COMMITTEE
Report Title:	Response to Maldon District Issues and Options Consultation 2022
Date:	17th March 2022
For:	Decision
Key Decision:	No
Decision Planner Reference Number:	N/A
Report Presented by:	<i>Alan Massow – Principal Planning Policy Officer</i>
Report Author:	<i>Alan Massow – Principal Planning Policy Officer</i>
Enquiries to:	Alan Massow – Principal Planning Policy Officer

1. Purpose of the Report

- 1.1 Maldon District Council's Local Development Plan (LDP) was adopted following examination in public in 2017 and covers the period 2014 to 2029.
- 1.2 Maldon District Council has decided to update its Local Plan and has now published an Issues and Options consultation. This is because Policy S3 of the Maldon Local Development Plan contains a requirement to review the Local Plan if certain criteria are met. In this case Maldon District Council's delivery rate for its Garden Suburbs and Strategic Allocations have produced less than 75% of their projected housing completions in three consecutive years. Since the previous Local Plan was adopted in 2017 Maldon District Council also consider elements of its evidence base to be out of date.
- 1.3 The report below sets out a summary of issues and comments proposed for submission to this consultation.
- 1.4 This is the first stage of the Review of the Local Development Plan. A consultation on a preferred strategy (Regulation 18) is expected in Summer 2022, with a view to submission in late spring 2023 and final adoption in late Autumn 2023.
- 1.5 It should be noted that the consultation closes before this committee however Maldon District Council have agreed that we can submit a holding response until the final response is ready.

2. Recommendations

- 2.1 *That the comments set out in the report below are submitted in response to the Maldon District Issues and Options Consultation.*

3. Summary of Issues

3.1 The consultation is split up into several subjects outlined below.

Strategic and Cross Boundary Issues

- 3.2 Maldon has identified a number of strategic and cross boundary issues. Of particular interest are those relating to highways where the A12 widening and junction improvements at Hatfield Peverel, Rivenhall and Witham. Delivery of local highway infrastructure identified in the current LDP including the South Maldon and North Heybridge Relief Roads have also been identified.
- 3.3 Of the environmental issues, the impact of residential growth on protected habitats and the water cycle are of most relevance to Braintree District.
- 3.4 For housing there has been a significant shift from the Plans previous position, which treated Maldon District as its own housing market area. It is proposed to extend the market area to include Chelmsford and Braintree, however despite the high levels of commuting referenced in the document does not refer to any other areas. The Council is concerned that this study and findings were completed with no involvement from BDC which would have been expected in line with Duty to Corporate. A reference is also made to the need to provide for Gypsy and Traveller Transit sites in Essex. This is supported only if it is comparable with joint work carried out by the Essex Planning Officers Association (EPOA) on the same subject and which ensures the same methodology is applied consistently across Essex for both permanent and travelling pitches.
- 3.5 Finally, the provision of cross boundary education and health are referred to which officers support.

LDP Review – The Issues

- 3.6 The majority of the issues identified are carried over from the previous Local Plan, they have however been updated to reflect things like the continuing shortage of affordable housing and high levels of out commuting, and the declared climate emergency. The revised issues are supported by officers.

Spatial Vision

- 3.7 The Local Plan is updating its vision to include reference to climate change and to make affordable housing a higher priority, as well as making design more beautiful. Officers support the revised vision.

Objectives

- 3.8 The objectives for the Local Plan have been updated to include reference to climate change which officers support. Officers also support the commitment to allocate sufficient housing to meet the Districts need to 2043.

Meeting the Housing Needs for the Future

- 3.9 The proposed Local Plan period is 2023 to 2043. The Council have produced a Maldon District Local Housing Needs Assessment in July 2021. The annual housing figure for Maldon has been calculated as a minimum of 308 new homes per year. When considering what has already been committed a total of 4492 new homes are required to 2043.
- 3.10 It should be noted that Braintree District Council does not require Maldon District Council to meet any unmet need within its Plan and that Braintree would not support a request from Maldon District Council to deliver any of its housing need

Options for Growth – The Settlement Pattern

- 3.11 This section sets out the settlement hierarchy for the district. Maldon/Heybridge and Burnham on Crouch are defined as towns at the top of the hierarchy as to be expected. Of the settlements closest to Braintree District, Wickham Bishops is defined as a large village and Ulting is a small village. The proposed hierarchy is supported as it appropriately identified those towns and villages which are most sustainable.

Options for Growth in the Review LDP

- 3.12 The current Local Plan concentrates growth through sustainable extensions to Maldon, Heybridge and Burnham on Crouch with no allocations in the smaller settlements beyond what had already received planning permission. This has obviously not been as successful as it could have been as it has not delivered housing growth at the expected rate triggering this review. Government now also requires 10% of housing allocations to be delivered on sites smaller than 1 hectare.
- 3.13 Maldon also has to consider the possibility that a development consent order could be issued for the Bradwell B Nuclear Power Station during the life of the Plan, and whilst outside the decision making powers of the local authority could bring significant levels of housing growth above what is currently being proposed.
- 3.14 The Council did a Call for Sites exercise which shows where in the District sites have been submitted for considerations. Whilst this is not up for consultation (But new sites could be submitted through this consultation), it should be noted that site GB1 – Great Braxted is partially within Braintree District near Rivenhall End. The site has been submitted for an extension of employment uses at The Commodity Centre and is about 57 ha in size. Braintree would obviously seek to be involved in any discussions regarding that site and the Maldon Local Plan cannot designate land within Braintree for any purpose.

3.15 The Issues and Scoping Document sets out seven options for growth.

- Option 1 – Retain the option in the 2017 LDP – Focus growth in the settlements of Maldon/Heybridge and Burnham on Crouch.
- Option 2 – A strong focus on the towns and larger sustainable village
- Option 3 – Growth generally focused on the towns Maldon/Heybridge and Burnham on Crouch and all the large villages of the settlement Hierarchy
- Option 4 – Pepper pot growth throughout the Settlement Hierarchy (Growth spread across all sustainable settlements in the District).
- Option 5 – Create a new satellite settlement or large urban extension bolted onto one of the towns, large villages and/or settlement adjacent to the District Boundary
- Option 6 – Focus growth in the north of the District to link into the services and facilities available in Tiptree, Witham and Maldon/Heybridge
- Option 7 – Focus growth along the rail line to Althorne, North Fambridge and Southminster.

3.16 It should be noted that these different options are dependent on sufficient sites being available.

3.17 Of the options officers are of the view that Options 1 to 3 are the most appropriate as these direct development toward the most sustainable locations within the district.

3.18 Option 4 is not supported as it does not provide sufficient growth in one place to be able to support improvements to infrastructure.

3.19 Option 5 is not likely to be deliverable considering the location of sites available to the Council as can be seen from their Call for Sites exercise. This option would also require significant infrastructure improvements in Braintree District if the settlement were to be adjacent to Witham and Hatfield Peverel due to the existing road connections.

3.20 Option 6 - appears to be limited by a lack of available sites, meaning that the Plan may not be able to deliver its expected level of growth. This could also have a significant impact on Witham and the surrounding villages. Growth and infrastructure improvements in Witham are planned for within the draft Local Plan but any further growth which is seeking to make use of the facilities of Witham would need to provide for further significant infrastructure improvements. If this option is considered to be taken forward then this will need detailed discussion with Braintree District Council.

3.21 Option 7 – Does seem to be an interesting possibility especially considering its proximity to the railway line and the high levels of commuting to London,

albeit this could exacerbate the out commuting problem and associated local affordability issue. This option could be beneficial if Bradwell B were to be approved as it would concentrate infrastructure

Effective Use of Land

- 3.22 Maldon District has limited options for brownfield development and is going to be primarily reliant on greenfield sites. This approach is noted.

Housing in the medium and small villages

- 3.23 The previous Local Plan limited development within these villages, it is considered that as a result a lack of flexibility is likely to have undermined the Council's five year supply. As such an approach which allows for a more flexible approach to development provision within medium and small villages.

Future Homes for Gypsy, Traveller and Travelling Showpersons

- 3.24 The Council is updating its Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) to take it to 2043. The Council continues to work on the Transits Sites needs assessment with the other Essex Authorities. This study has been delayed due to the Covid pandemic.
- 3.25 Braintree District Council supports this approach provided it is comparable to the joint working carried out through the EPOA on Gypsy and Traveller Provision.

Self Build/Custom Build Housing Plots

- 3.26 The Council is considering allocating specific sites for self-build/custom build or encourage them to be brought forward on smaller sites in the District. This approach is supported.

A Beautiful Built Environment

- 3.27 The Local Plan review will prioritises attractive places and spaces when making choices about future land allocations and policies. The National Design Guide Illustrates how well-designed places that are beautiful and successful can be achieved in practice and supports local design guidance that meets the priorities of local communities including, beautifully placed (Sustainable settlements patterns and sitting in the landscape), beautiful places (streets, squares and parks), and beautiful buildings. The Council supports this approach as it is consistent with National Policy.

Tackling Climate Change

- 3.28 Climate change is one of the biggest threats that will be faced at local, national and globally level. The Local Plan Review intends to review the LDP to significantly strengthen its policies in connection with climate change.

3.29 The Council supports this approach.

Enhancing and Growing the Economy

3.30 The Local Development Plan review will seek the provision of high quality employment land works to attract business and enterprise to an area, which in turn creates and diversifies employment opportunities, increases the addition of value and to strengthen the local economy.

3.31 The Council supports this approach.

The Visitor Economy

3.32 The LDP Review will seek to support development which contributes positively to the growth of local tourism in a sustainable manner and realise opportunities that arise from the District's landscape, heritage and built environment.

3.33 The Council supports this approach.

Protecting and Enhancing the Environment

3.34 Many parts of Maldon District are areas of international, national and local importance and subsequently have been designated as Ramsar Sites, Sites of Special Scientific Interest (SSSI), Special Protection Areas, and National Nature Reserves (NNR). Development can result in unacceptable negative impacts on areas of wildlife value.

3.35 The Council acknowledges the many environmental designations which exist in the Maldon District, and continues to support the provision of financial contributions through RAMS to mitigate increased user pressure on these areas. Growth or policies within the emerging Plan should not undermine the joint work in this area.

Access and Sustainable Transport

3.36 The previous LDP sought improvements to highway and public transport infrastructure to support the growth in the LDP. Maldon District will be commissioning work a highways and transport modelling study. The LDP Review will need to give consideration to how road schemes already proposed in the previous LDP can be provided, and depending on the strategy which new schemes may be needed. Braintree District Council would seek involvement in discussion of any schemes which may be required within Braintree District, otherwise Braintree District Council supports the proposed approach.

Securing Infrastructure

3.37 National policy sets out that a LDP Review should set out a strategic policy which makes sufficient provision for infrastructure. As such Braintree District

Council supports the LDP Review aim of providing sufficient infrastructure including the provision for high quality digital connectivity.

- 3.38 To conclude Braintree District Council broadly supports Maldon District Council's approach to reviewing its Local Development Plan. Braintree District Council seeks to continue to discuss cross boundary issues and looks forward to commenting on later drafts of the Plan and additional evidence base studies which may impact on Braintree District.

4. Options

- 4.1 *To approve the comments outlined above in Section 3.*
- 4.2 *To not approve the comments outlined above in Section 3.*

5. Financial Implications

- 5.1 No direct financial implications.

6. Legal Implications

- 6.1 This is a non-statutory consultation.

7. Other Implications

- 7.1 None

8. Equality and Diversity Implications

- 8.1 Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:
- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
 - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not
 - (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 8.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- 8.3 This is not a BDC document and as such no Equalities Impact Assessment has been prepared.

9. List of Appendices

None

10. Background Papers

Maldon District Issues and Options

Consultation <https://maldon.inconsult.uk/system/home>