

LATE SCOPING CONSULTATION RESPONSES

Consultation bodies have 28 days to respond with any comments, stating either the information that they consider should be included in the ES or that they do not have any comments.

Any responses received after the deadline will not be considered within the scoping opinion but are forwarded to the applicant for consideration in accordance with the policy set out in Advice Note 7: Environmental Impact Assessment, Screening and Scoping.

The following EIA scoping consultation responses were received after the consultation deadline specified under legislation and therefore did not form part of the Secretary of State's scoping opinion.

From: [REDACTED]
To: [Environmental Services;](#)
Subject: Bramford to Twinstead Tee 400kV Connection
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Attachments: [1304 Scopin Doc Response.docx](#)

National Grid Bramford to Twinstead Tee 400kV Connection

Gestingthorpe Parish Council Response of April 2013, to the Feb 2013 ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT

appended

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Bramford to Twinstead Tee 400kV Connection

Gestingthorpe Parish Council Response of April 2013, to the Feb 2013 ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT

Background

Gestingthorpe Parish Council supports moves to reduce the proportion of electricity produced from high carbon dioxide emitting fuels and to increase the contribution from renewables. It thus recognises the consequent need to increase the capacity of the grid between the East Coast and the London area.

This response is on the detail of the Bramford to Twinstead solution, and does not imply that the Parish support this solution over alternatives such as the construction of an East Coast to Thames undersea link, which could become part of a British or European Supergrid.

The Parish Council has made the decision to comment only on the Essex portion of the project. The absence of comment on the Suffolk section of the route cannot be taken as support for National Grids proposals east of the Stour Valley.

It strongly supports the proposal to underground the new 400kV line where it crosses the Stour Valley, to continue the undergrounding as far as a point close to (or to the south of) pylon 4YLA 004 on the current Twinstead T to Braintree line.

General Notes

Special Landscape Areas

5.2.64. The western extent of the Stour Valley is in Braintree District and was formerly also a SLA.

The PC would like to emphasise that status of the landscape on the Essex side of the river Stour was not downgraded. The change reflects the early adoption by Braintree DC and Essex CC of Government planning policy. Instead of using “Special” as a shorthand for “highly amenity value”, all landscape is now “special” with the special (low or high value) character of each described in detail.

Note on the Scoping Document

In the Scoping, Flora are considered separately, but the principal value of the flora at the western end of study Line Study Area G and Substation Study Areas A, B and C is as the fine detail of a Landscape people love to visit. Likewise the settings of Historic

Buildings are considered separately, but the buildings and their setting are but part of the landscape residents and visitors enjoy.

The principal consideration must be the lives of the local residents and the enjoyment of the countryside by those from towns who come to visit it, whether as short trippers or as tourists staying in local hotel and patronising local facilities.. The bulk of material on flora, fauna, buried architecture etc. is of much less significance, but interrupts the more important consideration of landscape and noise.

400 kV line

Landscape

The description of the local landscape and its sensitivity to change indicates that it is still very “Special” in the old sense, which is reinforced by its recommendation for inclusion in an extension the Dedham Vale Area of Outstanding Natural Beauty.

5.2.70 to 72

This section fails to emphasise why the valleys are such important features in the East Anglian landscape and their special sensitivity to overhead lines. **The steep sided side valleys are of especially high amenity landscape value** because they are a relief from the predominately flat Essex countryside. Their value comes from their dramatic shapes, not their sizes, which are small compared with to valued Pennine or Alpine valleys. This smallness makes them vulnerable. **A 132 kV pylon line dominates such valleys and a 400 kV line overwhelms them.**

The concentration of public footpaths and protected lanes is a consequence of the high landscape value, which undergrounding will protect.

Support

The area around Twinstead is has favoured contours of is of special botanical interest, but is spoilt by the three way (east, west and south) 400 kV pylon lines and the adjacent east west 132 kV line with its diamond underpass. Gestingthorpe strongly supports the plan not to add another 400 kV pylon line, but to underground the new 400 kV line as far as 4YLA 004 allowing the removal of the southerly 400 kV line from this sensitive area. It also supports the improvement in landscape character by the removal of the 132 kV pylon line from the east as far as, and include, the diamond crossover.

The PC considers the value of improvement in Landscape and natural environment achieved by undergrounding far exceeds the cost of local disruption during construction and disturbance to wildlife, which will be largely temporary, as the habitats being disturbed are not locally unique to the small areas of disturbance.

Dissent

The PC cannot support the retention of the redundant section 132 kV line to the west of the diamond. This is considered under Replacement Supply. This should be in the scoping.

New 400kV/132kV Substation

Need

The Parish Council accepts that a local 400 kV to 132 kV transformer is the most obvious and effective solution electrically. However this is not the most satisfactory solution from a landscape point of view. It introduces a NEW highly visible incongruous element into a rural area. It will also introduce continuous noise into a quiet or very quiet area.

National Grid has not produced sufficient evidence to dismiss the alternative of an underground 132 kV connection to an existing substation in a less sensitive environment, such as the one at Braintree. The cost difference is a small price for the improvement on landscape and tranquillity. With no evidence of a significant power loss by using such a route, it should remain an option.

Just as the overall decision to construct the 400 kV line did not take a long term view with undersea super-grid, so this substation proposal does not take a long term view on the 132 kV network. UKPN wishes to retain line made redundant by this transformer so as to make it available as a possible supply to new development in the area to the east of Colchester or south of Sudbury. Any new connection would either: have to be underground across the Stour, in which case the work should be concurrent with that on the 400 kV crossing; or turn south, in which case it would take it closer to the Braintree substation, making the Braintree option cheaper.

Either the case for a transformer being in the Twinstead Hedingham or elsewhere should be reassessed in the context of a properly planned extended 132 kV line, or there should be a binding commitment that the section of 132 kV line to west of the diamond close to Twinstead T made redundant by the new supply should be removed as soon as the new supply is established.

Environmental Impact

Substation Study Areas A and B are in Braintree District Council's Hedingham and Maplestead Ward.

Substation Study Area B is half in the Parish of Gestingthorpe and about 1 km from the main village settlement. Area B includes a large detached house and a pair of semidetached houses very close to some of the possible transformer sitings.

Substation Study Area C is about 2 km from the Parish boundary and about 3 km from the village main settlement.

Noise

The Document is almost dismissive of operational noise, which will be continuous. There is anecdotal evidence to suggest that the local geology is such as to allow long distance ground propagation of low frequency noise. No geological information is given and there has been no ground transmission testing at the proposed sites.

Modern flooring materials can act as sounding boards for ground transmitted 100 or 200 Hz ground transmitted noise.

The A1017 and A131 have moderate day traffic levels outside peak hours and low traffic levels at night. The minor road from Hedingham to Bulmer Tye (formerly the B 1058 but now downgraded) has light traffic outside peak hours and virtually no traffic at night.

Hence: at Substation Study Areas A and C at night it is generally quiet with intermittent vehicle noise, while at Substation Study Area B it is almost completely silent at night with very infrequent vehicle noise. It follows that the surrounding areas would be very sensitive to night time transformer hum. The area round site B, with its general tranquillity and exceptionally low night-time background noise would be very noise sensitive where it is close to the former B1056 and exceptionally noise sensitive further down Delvyns Lane, where the 3 dwellings within the Parish of Gestingthorpe are situated. Those suggested sites within the Area that are close to the three dwellings are totally unsuitable on noise grounds.

There needs to be proper assessment of the sound transmission properties of ground. There must be rejection of any of these Study Areas for which appropriately designed vibration insulation between the transformers and the ground cannot assure sound levels that are negligible compared to night-time background noise.

The need for a diesel generator to operate switchgear, monitoring and communications equipment in the event of power loss is accepted as its use would only be in major emergencies. However the construction of standby generation to supplement the Grid supply during times of low renewables about is totally unacceptable at any of the locations under consideration. Such future additions should be specifically excluded.

Landscape

Although the Substation Study Area C is in the Colne Valley, which is described as an area of relatively high sensitivity to change, the proposed site is in a part of the valley where there is industrial use and various buildings adjacent to the main road, making this piece of valley less sensitive than the Colne Valley in General.

Although Substation Study Area B is part of the Yeldham Farmland Plateau, which is described as moderately sensitive to change; being in an area popular with walkers (especially those setting off from historic Castle Hedingham), being off a minor road, being close Hedingham Castle, and being in an area with ancient buildings, hedges

and mature verges - makes it more sensitive to change than the majority of the Farmland Plateau.

Substation Study Area C is on the Wickham Farmland Plateau which is designated as relatively sensitive to change. It is not clear why this farmland plateau has a higher rating than the Yeldham one, but it is probably because of its elevation and the possible impact on views from the Stour Valley. The area is not well walked and the principal viewing of the area between the woods would be a fleeting glance from a fast moving car. While sensitive to the erection of extra pylons or a very tall building the study area is not especially sensitive to change at lower levels.

In landscape terms, for the kind of development under consideration, while all locations are sensitive, Substation Study Area B is far more sensitive than Substation Study Areas A and C.

A reduction in the landscape degradation can be achieved by suitable design, including symmetrical down cabling and 400 kV switchgear, by minimising the clutter within the compound by siting most of it in a single building and by choice of perimeter fencing.

Removal of redundant 132 kV line

The need for a replacement 132 kV supply arises from the removal of the 132 kV line east of Twinstead to provide partial mitigation for the construction of new 400 kV lines to the east of Twinstead. Hence the overall result is to dump a 400 kV to 132 kV transformer and switching substation in the Essex Countryside to mitigate new overhead lines in Suffolk.

It is thus reasonable to expect any possible mitigation for the area around the substation to be given. Initially the impression was given that redundant 132 kV line west of Twinstead diamond would also be removed, but National Grid have not included (or perhaps not achieved) this in their negotiations with UKPN. The removal of all redundant line should be a condition in any permission for any substation in this area.

Stephen J Bolter

Gestingthorpe Parish Council Community Forum Representative