

Written Representation to the Examination Authority Re Bramford-Twinstead 11th October 2023
FULL submission: including further supporting commentary on initial representation

1 Commentary on examination process / assessment of application documents

Publication of information is not the same as transparency or engagement – the sheer volume and formality of documents make it hard for an individual to assess – especially when the preceding consultations have been a similar ordeal.

I know that some people have disengaged with this examination process, feeling that it is impossible to make a difference, too dispiriting, even when these are major life-affecting matters, even at the end of a long period of consultation and involvement. It is hard to find the time to do it justice.

The process itself, with the requirement to work out how to respond on specific issues at specific time, the weight of often almost impenetrable information and document cross-references, discussions with National Grid about compensation and local terms, and the simply depressing all-consuming effort involved in having to take this on, even a bit, does not encourage engagement or have defeated many affected and interested parties already. As a further example: I can't individually provide a counter environmental study or a detailed costing or technical analysis of why undergrounding would be better, let alone point by point 'rebuttals' as seem to be invited and provided in turn by the Applicant. But I can point out where the proposals seem to be lacking, flawed or damaging and ask for the examination process to take that into account.

Further, individual voices may not carry equal weight and we have to hope that the Planning Inspectorate will in some way represent the 'small' non-institutional, private individual or landowner. Few if any of the people commentating on and assessing this will be affected in quite the same way as the directly affected parties living and working near or under the proposed new lines. Yes, this is an opportunity to be heard, and guided by rules / statute, but I am sure that many are not engaging. This will be evidenced by figures both the Applicant and Planning Inspectorate will have. For example: a thousand odd comments at consultation, 600 or so at the last series of consultations, 138 interested parties for the Examination. How many private individuals commented at the preliminary hearing? One. How many will speak at the hearings?

As an individual it is also hard to follow the prescribed route for making submissions, which even detail how the submission should be titled and indexed, and how and what we can comment on by when. Fine for people whose full-time job this is but not for the actual people whose lives will be damaged by this, but who have other things to do, even if this is a life-altering proposal.

This particular, presumably key, submission of written statements in support of an original representation has in effect been hidden away in an annex to the timetable. On top of this it is said to be required in order for someone to contribute to any later hearing. I understand that the information is actually there for those who look. But no reminder appears to have been sent to interested parties and I am sure there are many who will not be contributing as a result.

I fully understand that there needs to be a process so thank the inspectorate in advance for taking all this into account when assessing submissions (or lack of) from individual affected parties. We also rely on our representative councils and politicians to speak for us on matters we can't get into detail on.

2 Consultation process / application information

I wish to highlight a couple of points of order regarding the past consultation information, which I believe has a bearing on how people assessed and responded to the plans, and is now included in the supporting planning application information:

- a) Is it sufficient that the plans (maps/ charts) as submitted are in general 'indicative' and allow 'deviation' within any eventual DCO? Surely at this stage they should be firm, especially where they relate to such important matters as an actual 50m pylon? ¹ (Note: the original document notes further qualify this by saying that 'further information can be found in the 'Guide to interacting with consultation' – but there is no further helpful information)

The point for this examination is that this 'detail' can be crucial, especially where the pylons would be so close to properties, as in our case, and as a consequence hard to comment on fully in tr current form². We previously asked this question of National Grid staff and were told that yes, in effect they would go where they are shown, but clearly there is some scope for variation. This would also apply to other aspects like construction access. Further, in the past we were always verbally told there would eventually be local / on-site discussion about 'micro-siting' issues. But what assurances do we have that the plans as submitted will be the ones built, or that there will indeed be a further consideration of 'micro' issues? Specifically in our case it could mean the difference between a pylon 150m away and 50m away from our home, and even having two immediately adjacent.

- b) The plans for pylons around Hintlesham Woods constantly referred to the 7 new pylons as "realigned", both in writing in the consultation publicity and on the maps. Again, this has been pointed out to National Grid on many occasions as being a misrepresentation to anyone assessing the plans in summary or even studying the maps in detail, when in fact they are completely new pylons and lines across unspoilt countryside at places up to 1km away from an existing pylon. That is not a 'realignment'. I know that this led to confusion in the 2022 consultation when people were being asked on preferring route options. Despite my and other people's complaints this was not corrected.

As a more general point: Can National Grid point to anything in the over-a-decade-long consultation has resulted in serious amendment to their original intentions and plans on our stretch? As far as I can see on our section (originally AB Bramford-Hintlesham) there has been no material mitigation or change, let alone taking into account our own personal representations. Perhaps the addition of some 'environmental' areas for so-called 'offset'.

¹ As an example of this: at a meeting with National Grid in March 2022 - following my email request for precise answers - I was guaranteed that the minimum distance of any equipment from our property boundary would be around 70m and from our actual house around 120m. However, I estimate it could be less, especially if the 'variation of route' boundaries are applied. We did not receive a formal answer to the remainder of my questions in that email about distances.

3 Specific points relating to ‘additional’ consultation and amended plans October-December 2022.

In general, the consultation process has been flawed (now across three decades) and I and many others have pointed this out in many exchanges, submissions and meetings with National Grid over the years. I would be happy to expand on this where helpful and to provide further documents as evidence (e.g. emails) subject to redaction / National Grid’s approval (see appendices).

Here I wish to make two specific points about the ‘supplementary’ changes to plans in October 2022, and subsequently:

3.1 Changes to plans / order limits / access points / mitigation

After 12 years of planning, including the full statutory consultation in Spring 2022, National Grid made some changes to their plans shortly before making the application - these were not discussed or ‘consulted on’ in the same ways as before, and some might say cynically obscured in the publications and the way in which a ‘secondary consultation’ was included. I like to think I follow things closely but I missed the proposals which would affect us, annexed away in a graphic, which was only referred to in the summary document, with no reference whatsoever in either the summary document or website release / letter, which itself only invited comments on “National Grid is currently consulting communities in the western part of the Stour Valley...” As a result, many people including myself missed specific points included – i.e. so-called ‘minor’ changes to changes to access and order limits. I wrote to National Grid as part of my submission questioning the scope and publicity for it, and also pointed this out separately (email of 18/10). I received no reply. National Grid has then treated this process in retrospect as ‘consultation’, but it wasn’t.

On realising these additions in March 2023 I wrote by email to complain to National Grid about the specifics so they could amend their application and requesting a meeting to discuss. I received no reply.

As a result, for example, we are unhappy with these specific later additions to the plans without any discussion let alone reference / notification:

- a) the proposed use of our track and entrance to three households in order to access to the neighbouring ‘environmental area’ for proposed mitigation / offset planting ^{3*}-
- b) the commandeering and use of land immediately adjacent for proposed ‘mitigation’ planting which would screen our property from the pylons and lines, but in effect have the result of screening us from daylight while increasing risks of access, security and fire. As this is presumably for our ‘benefit’ we would have expected at least a discussion about it, and for it not to be hidden away in an annex map to discover later at the last minute, post-consultation. These are not ‘minor’ points at all but are yet more ill-considered and life-affecting developments and should have been treated as such. We have since raised these points again directly and also suggest that a highways inspection be conducted in this area, if not already included. We are now discussing directly whether we will agree to this, but we had to raise and include in an already requested meeting with National Grid.

These are just two points that affect us directly. Frankly, these developments on top of the pylon proposals and lack of consultation made us feel under attack, literally from four sides, bullied even.

^{3*}This is the proposed sequestering of farmland for ‘planting’ between Ramsey and Wolves Woods (“ENV04”) – whilst included on an original consultation map this was broadly discounted during the consultation when raised - this will unnecessarily take out of production, by my estimate, some 50 acres of prime agricultural land - an open landscape for centuries – and make the remaining field more costly to farm. We do not see the rationale for this other than it being an ill-considered paper exercise to show some kind of ‘offset’.

I imagine that there were other amendments across the route which have caused similar problems. I can see that there are other submissions to this effect and I know there are others with similar concerns.

3.2 Hintlesham Woods

Secondly, and clearly more widely important than our specific issues: the preferred Option 2 route around Hintlesham Woods - paralleling existing lines rather than adding new ones across 3-4km of open unspoilt countryside and habitat - was put forward as a result of the original consultations and strong local support. However, the later rationale for rejecting this option, in a published statement/email in December 2022, was never made clear beyond a very general summary of various points and there was never an opportunity to discuss it. Although National Grid claims that further discussions were held with "consultees" – and some kind of weight of opinion was behind it - these remain obscure and unpublished and, in any case, would not have been be a proper market survey. They cannot have been complete because they did not include me or anyone I know along the additional new route around Ramsey Wood.

In this example, in its last phase of 'consultation' National Grid referred to having "continued to discuss both options with consultees" after the formal consultation period. I asked at the time what such consultation had been carried out but received no response. National Grid has since stated that it thanks the RSPB for pre-application discussions, which presumably were not part of the open consultation.

At best there seem to be some tenuous and selective environmental arguments which did not take into account the wishes of affected residents and landowners - as far as I am aware, despite NG claiming it did – it was simply high-level statements that the Option had been discounted, and which are now simply being repeated.

This felt like a really strange decision which went against much of what has been discussed and preferred by locals. I also understand that National Grid actually preferred the rejected route due to cost (cheaper) and engineering (easier) considerations. Its project manager referred to the decision at the time as inconclusive and stated that there would be a 'further opportunity to give views... to the Planning Inspector'.

Amongst other flaws, the decision was **environmentally contradictory**, on top of putting some environmental assumptions (not even proof) over people's wellbeing, and plans to damage at least 3km of previously unaffected special landscape, whilst still affecting the woodland margins and related wildlife. The eventual application was also counter to our understanding that at least **both Options would be put as part of the application to the Planning Inspectorate**. (As stated in my submission I would therefore urge the examination to look at the assessment of the option choices around Hintlesham Woods and I am grateful that this was noted as an agenda point in the preliminary meeting).

I responded to the email received about the decision not to pursue Option 2, also pointing out the following⁴:

⁴ (this email chain and subsequent points can be provided, along with various correspondence on Option 2, subject to National Grid's agreement).

“In response to this I would refer you to all of my previous submissions attached. For record I would state that this is completely the wrong decision. It is not supported by the majority, including councils, politicians and residents. I challenge you to prove otherwise. I also feel we have been misled by your assertion that Option 2 would be put to the Planning Inspectorate, following the very feedback you now seem to discount, and that you have gone back on that. Who exactly was it decided this?”

“I will also ask that you provide evidence of the surveys and conclusions you refer to, and show that these were balanced and unbiased. You have not surveyed our side [of the proposed route], for example, as I consistently urged you to do.”

(Please see later section on environmental studies regarding what I consider to be these biased, incomplete and seemingly unscientific arguments...)

This was also in spite of what I believe many other affected parties expressed at the time, as I summarised in my submission: “If as a result of that previous consultation additional undergrounding is to be carried out then this strengthens the argument that the whole **route should be undergrounded**, as most people wish and request”. And being grateful that “you appear to have listened to the strong rationale and **majority-held arguments for Option 2 (existing route)** and against Option 1 (new route) and that the preferred Option 2 is being proposed for planning approval”.

I am not at all alone in these assertions. I would suggest that most if not all of the directly affected people on our section would prefer some combination of undergrounding and a parallel route (Option 2). I know undergrounding may not be suitable or favoured by many on other routes but it would seem to fit and be an acceptable solution for this section. Surely such consensus would be great news for National Grid.

Even the bodies directly protecting the woodland itself finally recognised that the damage is not limited to their boundaries only and that undergrounding would be preferable in the area:

“A possible compromise would be to underground the section of line around the north of Ramsey Wood, thus avoiding the woods, and not creating an eyesore for our neighbours. We acknowledge that this option would come at greater cost, but it might be a compromise which would minimise visual impacts **and avoid significant damage** to wildlife habitats. This would also enable you, National Grid, to be seen as delivering on your own Environmental Action Plan commitment to seek to reduce habitat fragmentation and prevent permanent habitat loss”. This statement was made by the RSPB, Suffolk Wildlife Trust, the Woodland Trust in their related submission in October 2022. I understand this statement to have been supported by our MP, who, amongst other statements on the subject, had also included the following in his own submission to the consultation in March 2022:

“Firstly, to limit the impact on my constituents, I would **urge you to consider undergrounding as much of the route around Hintlesham Woods as possible** – particularly in those areas where people haven’t previously been impacted by the overhead lines. I was pleased to see that two routes have now been proposed for Section AB – Bramford substation to Hintlesham. In principle, and with suitable environmental mitigation, I believe that **Option 2 presents the best solution, when considering those who will be most adversely affected due to their proximity to the proposed pylons and overhead lines.**”

I also understand that the various parish and district councils have made representations to this effect over very many years and I am sure will have supported and done so during this examination.

There was no sharing of the direct evidence and rationale that National Grid used to summarily discount the very option that would have been this compromise and that many on the new route could have supported (failing undergrounding)?

National Grid has now responded to the further similar enquiries as part of this examination by saying that "Option 1 is not the least environmentally constrained option". The rationale for this conclusion is not adequately provided and I do not believe is sufficient to simply justify this by saying it was "due to several important considerations including but not limited to: consultation feedback and engagement with stakeholders and landowners (who was that? what was it?); the findings of environmental surveys.... etc". There was no further adequate and open consultation on this.

4 Undergrounding – pylons are not the answer

There has been no proper consideration of undergrounding in areas where there will be a concentration of pylons

Yet again, National Grid's application has discounted the near overwhelming support for undergrounding this stretch, going back years, and including nearly every stakeholder. It has had over 13 years to respond to the pleas for proper consideration of undergrounding by locals, residents, and originally from renowned local commentators such as Maggie Hambling and Terence Blacker. This was the main thrust of objection from local residents during the first consultations (of which there were actually two rounds) in 2010-2012. We all see the need for infrastructure - but why does it have to be 100% on National Grid's terms? As far as I can see nothing has changed in their approach in 14 years.

I and many others do not believe that National Grid has conducted the right studies and assessment for this – the technology exists and the firm can afford it. And over this time new technological solutions have been put forward, with other countries and firms having put in hundreds of miles of cable both underground and subsea.

National Grid appears to hide behind some kind of statutory remit – but it is not 'protecting taxpayers' money' and is not a state organisation. It is protecting and benefiting the shareholders of a multinational, quoted private company (which pays *billions* in dividends each year).

And quite apart from the project cost-benefit - where is that actually disclosed? - I do not see anywhere how the human cost, especially risk to health through emissions and other effects has been factored in.

If this is a national project that is so important that it warrants undergrounding for much of the rest of the route then it should be undergrounded here, around Hintlesham Woods.

Once the pylons are there it will mean that even if new transmission options arise, it is highly unlikely that they would be removed within decades, if not centuries. In fact, their mere presence from planning mistakes of 50 years ago means that they will attract and 'justify' yet more pylons and industrialisation. This is not the future anyone apart from National Grid wants.

National Grid, with national /Government backing , has the chance to do the long-term right thing now, not the short term 'fix' (which even then would still only be operational after 20 years since the start of consultation).

Furthermore: surely it would be possible to actually improve things for the woods by undergrounding around them and enabling the existing line oversailing the woodland to be removed. That's the long-

term solution that the various environmental bodies should be lobbying for in this particular area at least, not just protecting their geographical boundaries at the expense of a wider area.

Ultimately this reinforcement should be made subsea around the coast of East Anglia and there is plenty of separate support, commentary on and rationale for that. But I can see that if a short-term solution is needed then pending subsea routes undergrounding is the solution in the Hintlesham area, as concluded for much of the rest of it.

We have been making this argument consistently over 14 years and through at least 4 consultation episodes, illustrated by original statements such as these:

- *I would strongly urge National Grid to use Corridor 4 and avoid the environmental and demographic impact that Corridors 1 and 2 [Hintlesham Woods] will have, and in any case that you commit to undergrounding as much of any route as possible. – my statement at first original consultation February 2010*

- ***This process needs revisiting with a view to undergrounding the entire connection***
*If there is any consensus it is around undergrounding. So please, if the connection really is required, just suspend these flawed overground plans, **commit to undergrounding the entire connection**, then have a proper review about the best route and constraints to undergrounding. This should be NG's duty to the community. If this is indeed a nationally crucial infrastructure project then the cost should be supported nationally, not at the extreme expense of a few in one particular community. – July 2012 – my comments at community hearing with NG and submission*

- ***Power pylons destroy landscape.*** *When planning committees discuss whether a stretch of countryside should be developed or industrialised, its first question is whether the landscape is already cluttered. Cluttered countryside is deemed already half-desecrated, and therefore less valuable, more amenable to further development. In other words, the march of pylons across Britain is not simply scarring the countryside. It is opening the door to further development and destruction. ...*

*What is nationally shaming about these proposals is that the destruction is being done in the name of profit. **Pylons are an outmoded form of power distribution.** The technology for underground cabling is well developed and is widely used by more enlightened governments across Europe.*

*... Has there ever been a time when the political and business establishment has been so relaxed about putting profit before the British landscape and the quality of life which it brings to humans who live there or visit? **A profound, dispiriting apathy towards our precious and rapidly dwindling natural heritage** is being revealed. –*

The Independent: Terence Blacker: A land despoiled by pylons. February 2010

- ***The Hintlesham and Burstall area has to be a priority for undergrounding due to its Landscape, Cultural Heritage, Ecology and most importantly its people.***

*Whilst the residents would ideally like to see the whole line put underground, in the event of National Grid choosing to ignore everyone with whom they have consulted, **we believe that the Hintlesham and Burstall area has to be a priority for undergrounding.** National Grid have not taken into account all possible options when considering [Corridor 2A –v– 2B in the Hintlesham and Burstall area].*

National Grid seem to take the view that as they have already blighted our landscape with one set of pylons and a sub station at Bramford, it is acceptable for them to add further blight to this highly populated valuable landscape area. However, as custodians of the Countryside we (including National Grid) have a duty to protect it for future generations. As residents, we have to think about the future of our children and grandchildren and we are not prepared to allow National Grid to blight our countryside by using a 50-year-old solution to solve a 21st Century problem

– Response to Connection Options Report Bramford to Twinstead Tee Connection Project
Submitted by 24 Residents and Land Owners along Corridor 2B July 2012

(That group response also asserted that the eventually ‘preferred’ Option2B (now Option1) is in breach of the Holford Rules, something we have not heard too much about in this later consultation and is presumably something the Planning Inspectorate will now be considering in detail).

There is of course a huge amount of information and commentary backing up these statements over the last 10 years since, including throughout the recent consultations, and I will be happy to direct the inspectorate to it as required.

5 Construction Process

The damaging impact of the construction process has been glossed over and I am pretty sure many residents including us are unaware of the likely and potential effects, even after 14 years of consultation. It also seems to be dawning on the various environmental charities who so far have been content with protecting their own boundaries.

We can see that the process will have a massive physical, financial and mental impact on a great many people, who will in effect be trapped in their homes, unable to avoid the disruption, as well as on the landscape, road and pollution, with severe disruption to wildlife, possibly irreversible in the case of Hintlesham Woods. The mental and financial impact has already been severe since NG announced plans, with the blight already applied to our lives and properties over many years. The reward for putting up with a still unspecified process will be pylons and lines emitting harmful radiation, noise, pollution and destroying pristine countryside, for ever more.

National Grid has been very light on the information provided about the intended construction process - methods / timing / access / environmental damage – and even now seems to be making up plans. This is even in direct conversation with them, let alone as part of any publicised information. I do not see why it is sufficient to rely on an approval of an outline, broad DCO which in effect gives them carte-blanche to do whatever they like within their red lines, and in our case for a period of 40 years (at least). This will be exacerbated by the use of sub-contractors to carry out the works.

To this end I have requested that National Grid discuss detailed plans with directly affected landowners and residents including myself, who would have a further opportunity for their views to be considered before construction activity, since this was not part of the original consultation process. Again, this might be complicated by use of sub-contractors. As an example, in our particular case, amongst other points, we have requested a full structural survey before and afterwards, with ongoing monitoring as necessary, be conducted in respect of potential use of percussion piling and possible other vibration effects and noise on our homes and property.

Specific questions relating to construction

- Footpaths: what restrictions will be in place? If so, for how long? There is no detail nor specific application as far as I can see.

- Access and construction road: is National Grid able to adequately explain the need for so many access points when the intention is to construct a major haul road along the length of the pylon route? Surely this is an unnecessary duplication of destruction and disturbance. Yet National Grid seems intent on adding even more, beyond the original plans presented in consultation.
- What mitigation would be put in place for the various impacts outline above including pollution, emissions, traffic, security etc.

6 Environmental arguments: Hintlesham Woods

I believe that the project as a whole, and in particular the use of pylons around Hintlesham will cause unnecessary, additional long-term damage to the environment.

I am concerned it will seriously affect our wonderful, diverse and often rare or protected wildlife of all kinds, to which I have referred elsewhere.

Although not an ecologist there are few people who know this area and landscape as well as me: my family have lived in this area for 50 years and I have also helped protect the woodlands for over 20. I consistently offered to help/advise on what might be found where and the likely impacts in the wider area.

Throughout the consultation we have also invited and suggested surveys at our property and specifically around the proposed pylon route to the northern and western side around Ramsey Wood. In the event I can see that only small areas has been surveyed, most some way away from the intended route, with additional desk research and even conjecture. It almost seems like this work has been deliberately selective.

Many of the environmental arguments seem to have been geared to justify the conclusion that Option 2 should not be pursued. But these appear skewed, incomplete and selective and contradictory. Similar evidence and surveys can be interpreted to say that there should be no Option 1 either. I can provide more background and commentary on this should the Inspectorate wish to look into it further, including correspondence with the RSPB in which I outline in detail the issues.

Regarding the application as it stands, I do not understand why so much of the survey material and locations relate to areas that are not to be affected by the Applicant's selected route, and so much of the rationale seems to be around where the new pylons are *not* going. Whilst at the same time not including enough detail about where they would go. This relates specifically to the area north and west of Ramsey wood including our own property and adjacent land across which the new pylon lines would be run. On many occasions I urged and invited National Grid to include these areas in their surveys and pointed out various wildlife issues but they do not appear to have followed up on this. I would also urge the Inspectorate team to visit this particular location to see and really understand the potential permanent disruption by aerial infrastructure.

The birds and other wildlife do not stop at the edge of the woodland. The effects of the pylons do not stop at the edge of the open fields. The construction process would be massively disruptive too. I am dismayed that the various ecological and environmental bodies are not more vocal and upset about the wide-ranging impact of these plans, including on their own areas, seemingly constrained by some kind of policy remit despite their public images.

As just one example of the mixed thinking and contradictory presentation of facts: the new line proposes a pylon (4YL13A) within 50 m or even closer of known nightingale nesting sites – critically one of just a few remaining in East Anglia. It will also bisect known rare bird and bat routes (between

our property and the woods). National Grid have chosen to base their conclusions on assessments of areas nearly 1km away, where there only 'may' be nesting nightingales and only 'could' be bat roosting sites. On one hand they imply that you can't have pylons near one part of the wood in case they might disrupt the possible presence of certain species but on the other you can have it near others where there are definitely rare species. Though of course as I say the rationale has not really been provided. This cannot be right and so needs further scrutiny.

The route as chosen will include damage to an ancient double hedgerow and large trees, even if it skirts the woodland, with the road / route planned to cut through at least one ancient track and several important wildlife corridors with sometimes double hedgerows. I do not believe that specific sites have been adequately surveyed.

I appreciate that there are environmental guidelines but the weighting towards these, however faulty, and away from people's wellbeing is in this case excessive and unnecessary, especially given selective and tenuous environmental arguments, with poor evidence, and whilst there are alternatives.

As examples of what I would suggest is sloppy, inconsistent approach to researching environmental impacts and considerations I will mention two items:

Specific Example: Bats (6.3.7.7 Bat Survey Report)

This report, as with much of the other environmental work, uses the phrases 'suggests', 'could be', 'likely', 'possible', throughout. I therefore question the certainty with which some of the conclusions are reached.

However, taking for example the conclusion on barbastelle bats (s4.2.8):

"The results show that Hintlesham Woods acts as an important habitat for barbastelle bats in terms of foraging, commuting and breeding."

These results look to be based on various survey points, but generalise about the woods as a whole. And I know that these bat activities take place at our property, across the fields between us and the woods, crossing the route of the proposed pylons.

If this is the case then surely the whole area around the woods, including the proposed additional pylon route, should be afforded the same protection as the survey points elsewhere. There also seems to be a very strong presence of all bat species, not just barbastelle, but this seems to be down-played in the conclusions.

I would hope to expand on these and similar points at the Environmental hearing. Given time I would analyse and comment further – and I would urge the examination to do this - that all survey points would be explored in respect of their findings and actual location compared to the projected pylon route. I suggest that this be extended to all species and all survey methodology, some of which is outdated or unsubstantiated desk research and therefore potentially biased.

Again, I have suggested and recommended surveys on our side of the proposed line - and in fact nearer to them - and of other potentially equally important sites - but these were not taken up. The report does show that some survey of bat activity was reported as done at three points near the proposed new route north of Ramsey and indicated a similar level of Barbastelle bat activity to that

up to 1km in near the existing line. (the map also seems to indicate a hedgerow survey in the middle of a field).

The conclusion seems to be inferred: you can't have new pylons where there are lots of bats in one place but you can in another.

On the other hand, the most bats recorded were actually closest to where there are existing pylons. I would suggest more work on this is needed and a closer review of this methodology be undertaken. I also suggest that the wording of conclusions are read more closely in relation to the actual data provided - they are skewed toward presence of Barbastelles in the existing line area and appear to downplay their substantial presence in the new one.

I also question why nothing more was done on the northern and western edges of Ramsey Wood (including for other species), especially when there is clearly a similar level of activity to other areas.

Example 2 - Habitat 'suitability' statement (ref7.8.1)

The concluding maps seem to indicate 'absence of dormice', through very low resolution shading detail. This seems to be a completely unscientific conclusion, apparently based on desk research and opinion. Handily it seems to show no dormice where pylons are selected to go. What reliance can be placed on such 'suitability' assessments?

Surveys outside of order limits

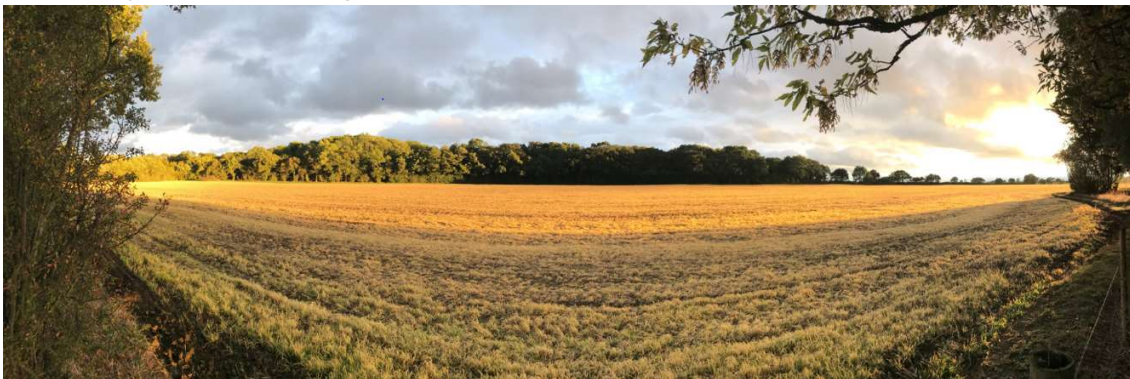
"The Order Limits cross the following areas which are shown as high suitability for [common pipistrelle]: • Hintlesham Woods;" (Ref 3.2.35)

This statement is not strictly the case with respect to the application as it stands. The order limits do include parts of the woodland crossed by the existing line, much of it scrub and secondary woodland (previously farmland) but not the additional new line to the north of Ramsey Wood.

When it comes to the section on Barbastelle Bats there is no reference to order limits, yet surveys were undertaken in the woodland outside order limits.

7 Visual Impact

The Hintlesham Woods area as a whole is a beautiful, special landscape equivalent to an AONB and should be afforded the same rights.



Part of route of new power lines around Hintlesham Woods SSSI, which would include 2 new pylons in scale of picture

Adding 3km of new lines across open countryside, which doesn't presently have them, and to closely encircle an ancient woodland and SSSI site is an appallingly unnecessary violation. I would again urge the inspectors to visit the site (photograph above) and consider that whilst not technically designated, it is pretty much the same, if not more valuable than much of the area being protected

by undergrounding in the Stour Valley AONB, where in some places undergrounding seems to have been proposed based on weaker or at least equivalent arguments. However, National Grid has attempted to present this as 'low grad' and 'low importance'.

In terms of personal impact, we and the many visitors to this area (the so-called receptors) also have the right to enjoy views and the exceptional countryside around, in this case unchanged for centuries. And this includes the virtual absence of industrial structures and man-made noise and light and radiation. The fact that these areas exist is the very reason these features should be protected, rather than feeling like that this place and others in similar positions are just considered a minority expense because of them – 'well it's only a few people and they can be ignored' (as described elsewhere)^[1]. The environmental report is also misleading in this respect by focusing only on listed properties.

The actual position and views may be deemed low value and the countryside and homes disparaged by National Grid reports, but as part of the consultation I challenged that assertion and invited the NG team to come and see in person, on the ground. This included the person I met who was apparently in charge of the environmental surveys but who said they had not actually been here.

I also feel strongly – that we have a duty – to limit the impact of infrastructure and industrialisation of countryside, especially when there are alternatives. In this specific area we need to be very protective of the area between Wolves and Ramsey woods, an aim I share with the RSPB, and I believe with other affected landowners.

These was at last recognised not only by other locals and politicians but also National Grid through the Option 2 proposal.

I would fully understand if the needs case (still) says we need infrastructure reinforcement of this kind, but there are better ways of doing it – both in general terms (eg. subsea or alternative underground/cable technology) and specifically in the implementation on the ground (e.g. better routing or selective undergrounding where appropriate). This is far from protectionist because as I understand it, all of the landowners on our particular section would support undergrounding as a way of meeting the transmission needs if the alternative route cannot be agreed.

8 Additional questions about the plans and application

- Have the environmental and ecological investigations around Hintlesham Woods been sufficient and appropriate?
 - Specifically, why have they been so selective?
- Have the archaeological and historical investigations around Hintlesham Woods been sufficient?
 - Why is the immediate area around the SSSI / special landscape area not being afforded similar status to other special areas?
- Is the Planning Inspectorate satisfied that human health will not be affected by emissions from the pylons and new lines? If so, where is the evidence and what further assurances will National Grid give in this respect? Specifically for these potential scenarios at our home: that there would be no harm to:
 - A child sleeping 35m away from (multiple 400kv) lines
 - A family living 50m from lines
 - A household using garden and areas continuously under and near pylons (as close as 20-30m)
- Relating to our specific situation and proposed siting: does the fact that we would be downwind (65% of prevailing winds from S/SW) of multiple HV cables and pylons, with the with proposed lines running parallel to the south our property, mean that the minimum allowed distance to our homes should be extended (against an increased risk and disturbance)? The noise, vibration and radiation would be extended over a longer area. This will be amplified even further because nearly all strong winds are from those directions.
- Have the alternatives to aerial cables been sufficiently explored? (e.g. undergrounding technology, alternative routes around Hintlesham, subsea cables)?
- How was ENV04 selected and what was the rationale for its particular shape and location?
- National Grid has verbally assured on several occasions that the proposed route to the north of Ramsey Wood – if approved – would not be used for any further, additional line or installation application. What restrictions / covenants would the inspectorate require to ensure no further such development, should approval be given? And that any approval of environmental areas - and specifically ENV04 - would indeed be for environmental/ecological purposes only, as presently intended/applied for.
- Has National Grid undertaken studies on the impact of their plans on tourism and other income generators for the region?
- What benefit to the community, landowners and residents would there be? How many new local jobs would be created, for example? Who will actually do the construction work?
- What additional investment into the community would be made – eg roads (at last making good the additional wear/damage), energy use, other remedial and mitigation works e.g. for pollution etc?
- What are the cost- benefits of the proposed environmental areas, other than meeting the claimed, pending statutory requirement for offset planting. How does this offset the removal of essential productive arable land?
- Why do the local community and individuals have to bear the heavy and disproportionate cost of National Grid being able to minimise its own spending, whilst it makes national and even international income from the additional lines?
- Is the Planning Inspectorate able to consider what it can do to ensure that National Grid at least recognises and ideally compensates for the human cost of its past, current actions and future plans - as opposed to the cost to the environment, infrastructure etc. I would also highlight the mental toll on many of the affected residents. So far there is little evidence of National Grid even acknowledging the human cost. Where is the 'offset' for the impact on people?

9 Summary of Impacts on affected parties, including us:

I understand that the Planning Inspectorate invites comments on the likely impacts of the development on people and the community. These will apply in general but I have written separately to National Grid and as part of the various consultation submissions, highlighting the following potential impacts that will directly affect us here, summarised as:

Financial harm

- Huge reduction in value of individual homes and the site as a whole.
- Reduction of life options and other opportunities (through being in effect trapped).

Harm to health

- Damage to wellbeing and increased risks of stress.
- Damage to physical health.

Environmental Harm

- Damage to wildlife, including rare species nesting and breeding
- Reduction of diversity
- Visual destruction of special landscape area
- Change to nature/quality of land

Physical Impact in addition to above

- Construction – potentially over many (unspecified) years: noise, vibration, damage to drainage/ditches, reduction of privacy, increased security risk, pollution: dust, light.
- Post installation – for ever: Visual disturbance of enormous magnitude, in a wide, presently unspoilt area, EMF effects, including link to cancers and other health effects, radiation and other pollution / emissions, noise and physical disturbances to humans (and for that matter animals, both wild and livestock), disruption to communications including satellite TV and mobile signals; disruption to other electrical equipment.

I can expand on these as required, especially where they may affect our particular situation. Our situation was summarised in our various consultation submissions to National Grid – as well as additional letters – and included requests around alignment, siting, construction, mitigation and surveying, as well as monitoring of EMF radiation. Whilst we have had subsequent meetings on these requests they have not yet been taken into account or committed to. Some of these relate to previous verbal undertakings.

Clearly some of the listed impacts, especially those resulting from construction, could also result from undergrounding. However most, if not all, on this immediate route seem to have made the calculation that the short-term pain of undergrounding would be worth not having the permanent installation of pylons and lines and all they would mean, for both people and wildlife/environment.

Some of these impacts can also be avoided and better mitigated by use of the alternative Option 2, paralleling the existing line at Hintlesham Woods.

Finally, I would mention a real macro concern that I believe will develop, even quite quickly, from the way this is going: if the people who care for and manage the land are put under pressure, while land becomes less viable and residents need to make up for lost income / values, then some may well decide to give up. Long-term residents will move away - if they are not trapped. Productive arable land will be reduced, and there will be far more inconsiderate development of what remains of the countryside, both residential and industrial. The attraction of the area will diminish. Interest and support for the environment in this area will change. The proposed 'environmental areas' will come nowhere near to offsetting that. They will hardly help affected people, if at all. I doubt wildlife will really have a net benefit from these particular plans.

If this really is in the national interest - and understood if we need to reinforce our network - then the holistic cost to people and the community needs to be considered and not just of transmission. We are told costs to National Grid need to be minimised but this simply displaces cost and should not be at the expense of so much else, nor borne to such a huge degree by residents.⁵

F Prosser, 11th October 2023

END OF STATEMENT

Appended (to be provided under separate cover)

- 1 Response to National Grid re consultation on proposed Bramford-Twinstead installations
Additional consultation - 16th October 2022
- 2 Response to National Grid re consultation on proposed Bramford-Twinstead installations
Consultation - 21st March 2022

Available, subject to redaction / approval as necessary:

- 1 Correspondence with National Grid regarding:
 - Consultation process
 - Hintlesham Woods
 - Environmental Surveys
 - Personal Situation
- 2 Letters to the RSPB about impact on Hintlesham Woods

⁵ This is even today recognised at least in small part by National Grid's chief strategy officer who said 'if you're hosting the infrastructure then you should get a benefit...'