# Submission in response to EXQ2 Questions and Comments from Applicant 17<sup>th</sup> January 2024

As a general point I stand by the points made in my submissions. The Applicant's responses do not change my or my family's views on the matters stated in them, but we appreciate the various recent new clarifications regarding the intended purpose of use of access and land for example. On other points the Applicant responds by simply repeating or referring to original documents or arguments made earlier or in consultation – for example on environmental issues - and just doing so does not really properly answer new points made, as with so many of their responses throughout this process. In the end, all submissions like mine can do is make points and queries and ultimately have to understand that it is for the Planning Inspectorate to consider whether the responses are sufficient.

But as invited, in response to the further specific ExA questions I would make the following points:

# Re: Examining Authority's Further Written Questions (ExQ2) (22 December 2023)

CA2.4.6 Applicant's Comments on Other Submissions received at Deadline 3 [REP4-022]

Item

# 1. Proposed temporary access and use of land off A1071 (page 14).

# 2. Need for proposed temporary access, including alternative to proposed temporary access and use of land off A1071.

Regarding the newly proposed and unnecessary screening right outside our house (ENV19), on our boundary, which at present has a fabulous open view of the fields, the woods and wildlife, we would of course welcome the offer of renewed dialogue with National Grid – and trust that when they say it is for the for the "benefit of Rams Farm" (that's us) and the benefit of "specific properties identified in the community assessment" (what is that assessment? Is it new?) that they do now actually ask us as the people who live there. Though if the Applicant was that concerned then it would be better not to place new 400kv lines 50m from our living spaces.

Note: There is also the seriously increased fire risk and increased security liability that would result from the additional screening and related access – these concerns were also raised directly in July 2023 with National Grid's agent – and previously in general during consultation.

3. Scale of proposed temporary access and use of land off A1071.

### 4. Land impact of proposed temporary access and use of land off A1071. (see also 7 below)

Clearly it is for the owner/ farmer to comment on this but from observation I would have thought that this makes the remaining areas far harder and less economical to farm. The total area taken out of arable production would therefore be greater. Even as an active supporter of biodiversity programmes I have also questioned the need for this particular site and such a huge area to be converted to scrub etc and taken out of production. I just don't get it in this instance and do not see how or why it is justified, despite all the references to previous documents and rules that the Applicant makes (see my separate submission comments on the purpose of this so-called mitigation / BNG). We also previously raised concerns that this area could in some way be used as a bridgehead for more lines / pylons in the future (see also one of my consultation submissions at Appendix 1\*).

#### 6. Consultation on proposed temporary access and use of land off A1071.

Other than the generic letters (K4.1) distributed about the so-called additional consultation in September 2022, none of us (that is none of the owners of plots at Rams Farm) received any specific letter relating to their property and the new, additional plans for additional temporary access using the properties' entrance (as the Applicant's response seems to suggests), or highlighting any expansion of the order limits. As such, the new plans, including additional order limits, were not publicised in this respect, let alone presented directly to affected parties, at least in our case.

Note: as shown by my attached submission at the time (\*Appendix 1) there was considerable misunderstanding about the purpose of the additional 'consultation'. The information provided and rationale given were inconsistent and gave the very strong impression that the new exercise was looking at only a couple of important points on the route. It was also over a very short time. Many people believed that the consultation had already happened and so did not engage further, or to the same extent as before. I for one did not consider any need to look in more detail for fine-print give the main consultation had just ended and we were focused (directed to) on a few 'main' issues e.g. Stour valley compound and Hintlesham Woods options - though I and others did submit our previous arguments as requested, both as a submission and by completing a form. I was also away for most of the time of that short consultation, even if I had thought to engage /attend any meetings.

The first details we understood of the additional access points affecting us were when our agent described them to us at the end of March 2023. At some point after then we were shown an option agreement plan of the track access dated 24/01/23. I subsequently found in June 2023 the amended general arrangement plans submitted to the Planning Inspectorate, which also showed the confirmed plans for screening planting outside our house ("ENV19"). It is still unclear to me which actual plans provided were the originals. The amended plan attached in document EN020002-001178-5.1.11 Consultation Report Appendix K states Sept 22, but these were not made available to us, let alone actively provided/highlighted to us during 'consultation'. All the publicity around the new 'consultation' focused on the Stour Valley and some apparently 'minor' changes to order limits etc and also the presentation of two options at Hintlesham Woods. Now that I look at the maps in that document, I can see that very new red lines were shown on minute scale summary maps but even there no 'additional' land within limits was highlighted (even if you could see it).

We did not receive any letter or any proposed agreement ("HoTs") in February 2023, as one of the Reference documents states. Again, we had to ask National Grid for detail of their proposed use of our property when it became clear to us as above in June 2023, following which we had a meeting with them on 10<sup>th</sup> July 2023, and after which we received draft HoTs.

The point of all this is that it is not reasonable to say that we were adequately consulted on these very important matters to us, on a substantial change that included our property, until after the application was made, nor with any real opportunity to discuss the new, specific plans before then. We do recognise that National Grid have since engaged with us on a potential agreement after we approached them directly on these points in June 2023.

# 7. Changes of definitions.

As described, we still do not think that the proposed planting is appropriate in this area ("Env4"), at least not without wider discussion and consultation for such a huge area and one which diverges from the actual infrastructure plans. However, even if it went ahead then the access as proposed is not needed in that form, as I submitted. We were also concerned that this access would be used for construction, particular when we noticed some change in wording in our proposed access agreement terms (HoTs), coupled with issue of maps in Land Plans April 2023 which clearly show the change of colour to green with the annotation 'Class 2' for CA which I understand to be for 'construction activities' i.e. at variance to the original consultation General Arrangement maps, which are annotated "Environmental Area" (and shown with no access).

# 5. Proposed temporary access and use of land off A1071 (page 16).

However, if the plans in this section were to go ahead, then we are at least reassured by the various new statements and assertions from the Applicant that the purpose of the 'temporary' access using our road entrance and track is for access to mitigation planting only in area ENV04 over up to 5 years (even if we think this is still unnecessary for reasons given in the submission) and not for construction or access to the pylon lines. The more recent statements made include: "the rights sought... remain temporary in nature (a period of five years)", "the Applicant is proposing the use of an existing access point. The nature of the access is such as to accommodate vehicles for mitigation and compensatory planting only" and "no permanent loss of vegetation or drainage ditch is proposed in this location. The track utilises an existing gap in the vegetation". It is also good to know that there will be no topsoil stripping for a track and any use would be sensitive to the nearby copse.<sup>1</sup> We trust that any planning approval would be given on this basis.

(Note: We relayed these and other points back via agents some time ago - and are waiting for amended HoTs to better address our concerns - these assurances go some way to that in the meantime).

# CA2.4.5 Book of Reference [REP4-037]

Regarding 6-21 and 6-29: as we are not owners of this land it would be best if this were confirmed with them.

Regarding 6-30 (proposed temporary access to environmental area ENV 4). This is still not showing fully accurate ownership, in that one name is incorrect, despite information provided by owners and in correspondence with agents over some. National Grid did not get in touch to verify as I invited in my previous submission: the correct current ownership for this particular plot is: Mr Jeremy N Prosser and Mrs Patricia A Prosser. National Grid should get in touch to confirm their correspondence address / contact details (which they should have already).

I also now note Regarding 6-31 (Access splay and Verges): this seems to list additional owners - we are double-checking our records here but invite National Grid to get in touch on this as well so we can verify with them – as well as needing to correct an owner name as per 6-30.

<sup>&</sup>lt;sup>1</sup> Ref Document 8.5.12: Technical Note on Ancient and Potential Ancient Woodland

\* APPENDIX 1: Response to National Grid re consultation on proposed Bramford-Twinstead installations, additional consultation - 16th October 2022, (No direct reply received) (full submission attachment March 22 available)

Response to National Grid re consultation on proposed Bramford-Twinstead installations Additional consultation - 16<sup>th</sup> October 2022

# Summary

Regarding the latest 'consultation':

- 1. The scope of this latest exercise is unclear. i.e. is it in addition to or superseding/overlaying the previous more detailed and broader one from March 2022? Are we just commenting on the two 'amendments or the whole process? I would be concerned that if recipients are unclear then a lack of response might be taken as an indication of strength of feeling about the overall consultation. At first sight it seems to be just the amendments, but then reading some of the text detail and also the box for 'other comments' it suggests you are again soliciting views on the whole route (when we've already done that at length).
- 2. 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.
- 3. The wording around 'Options 1 and 2' for the proposed route around Hintlesham woods is still vague, unclear and misleading specifically in the section 48 notice you have copied. (also the wording ",whilst" makes the phrase unclear, even nonsense). Specifically, it must be made clear that the Option1 route means adding an additional 4km of lines with 8+ pylons through unspoilt, unaffected countryside over 1km away from the existing line. It is not a 'realignment', nor does it replace pylons that would go 'through' the wood. Option2 follows the existing route. (This is particular concerning at this point given the volume of comment and feedback you've

received in the past about the misleading wording - and given that it now seems to be enshrined in official documents that would be considered by people making decisions on the route.

4. Having said this I am 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. Thank you for this, even if you have not been able to more strongly make a decision for Option 2 at this point.

Since in point 1 it is unclear to me (and other recipients) I would re-iterate the previous points made in my **previous submission** in March 2022:

In summary I would ask National Grid to:

- 1. Accelerate plans for subsea cables: the best solution for the long term is expanding the infrastructure to transmit electricity from source in the North Sea to London/South via a subsea cable route around the East Anglian coast.
- 2. **Reconsider underground cables for the whole route, and especially around Hintlesham**: failing a subsea route, undergrounding the whole 'reinforcement' route is the best solution.
- 3. Use Option 2 for overhead lines in section AB through Hintlesham: without undergrounding then Option 2, which parallels the existing pylons, is by far the best

solution. We are completely opposed to Option 1 which would add lines to the north and west of Ramsey Wood.

4. Not use any part of this process or route to later add what we understand to be a planned third (or more) set of overhead lines.

For completeness – and so that it may be reconsidered, if that is indeed what you are asking as part of this latest request for feedback - I will re-forward / attach the detailed supporting argument of my submission in March.

Francis Prosser Hintlesham

Attached (by email) Previous consultation submission (March 2022)