

To Whom It May Concern,

I am writing on behalf of CARE Suffolk regarding the non-statutory consultation for the Bramford to Twinstead reinforcement proposal.

We wish to start by stating that we are in support of the chosen route, and that we understand the need for reinforcement works to the transmission system in order for the benefits of the significant offshore wind developments to be fully realised.

However, we do have concerns regarding the proposal based on the limited information currently available. Our concerns relate specifically to the Bramford and Burstall area of the development, though we understand that some of our concerns are shared along other parts of the route.

Based on the information currently available, our main concerns are:

- Insufficient non-statutory consultation and choice of timing
- Overgrounding at the Bramford end of the proposal
- Cumulative impact at the Bramford end of the proposal

Insufficient non-statutory consultation and choice of timing

We note that the non-statutory consultation started on 25th March 2021 and ends on 6th May 2021. A period of 6 weeks, and that a notification letter was sent in the post to residents within 1km of the proposed route. We further note that the intention is to install pylons at the Bramford end of the proposal, not to underground this section of the route.

In the National Grid letter dated 21st February 2021 from John Bevan to Caroline Hopewell of The Planning Inspectorate regarding the re-commencement of the proposal it was stated that “we are also conscious that residents of the area may have changed since our last consultation and we intend to undertake a further non-statutory public consultation at the end of March 2021”

Pylons are tall structures. Ranging between 36m to 50m in height. They can be seen for many miles, and therefore impact a range much greater than 1km. With the chosen date range of the non-statutory consultation being held during a national lockdown, where there are significant restrictions of public gathering, those impacted by the project, but outside of the 1km range for the notification letter, would have been severely limited in receiving communication about the re-commencement of the proposal.

With public gatherings potentially being allowed to reopen on 17th May 2021, it would not have been unreasonable for National Grid to have extended the non-statutory consultation phase to the end of May at a minimum. The closure of the non-statutory consultation phase before public meetings can be legally permitted again is damaging to the purpose of a good consultation that includes all of the relevant stakeholders.

Overgrounding at the Bramford end of the proposal and impact on human and wildlife health

Bramford Substation appears to have been designated as the hub for all large scale Suffolk produced electricity to travel through. We believe there are currently eight existing overhead lines connected to Bramford substation, with additional lines underground. Four 400kv lines, and four 132kv lines. The Bramford to Twinstead line would represent an additional line. We also understand there are two more lines proposed by the National Grid – ATEC and ATNC – which would connect through Bramford. The route options for these have not yet been revealed by National Grid.

We note that when the Bramford to Twinstead project was first proposed back in 2013 there were many cases put forward for the full length of cable to be put underground, however National Grid still do not propose this.

The EA1 cable route that connects into Bramford substation was put underground. We understand that Scottish Renewables decided this early on, and that in the decision letter for the project it states “the Secretary of State is aware of the potential for Electric and Magnetic Fields (EMF) to have direct and indirect effects on human health... He is also aware that mitigation is available for such effects through the burying of cables...”

With so many overhead cable lines already converging into the area, further overhead cabling presents even greater, and unnecessary, risks of EMF on the health of nearby residents and wildlife.

We also wish to raise the concern of over ground development causing an entrapment danger to wildlife. CARE Suffolk was sent video footage of a Roe deer that had become enclosed by the maze of fencing around the existing electrical infrastructure at Bramford substation, and was subsequently injured in its failure to escape. (This video footage is publicly available on our website with permission from the nearby resident who had to intervene to help the deer.) This is permanent fencing. With further over ground development and more permanent fencing, this will only further curtail their natural routes and exacerbate the issue.

We understand that there would be short term issues for wildlife during the construction phase, but also understand this would be present regardless of whether the cables were on overhead pylons or underground. However, fully undergrounding the route would mitigate against the health risks of EMF and reduce the long term danger to wildlife.

Cumulative impact at the Bramford end of the proposal

The previous consultation for this project started in 2009, and was paused in 2013, with the majority of the consultation and environmental study work done between 2010 -2012.

We noted in the previous point that there is already a significant amount of overhead cable infrastructure in the Bramford area. In addition to this, there is the EA1 substation, the EA3 substation, two battery storage facilities, a gas generating facility, and at least three large scale solar farms proposed for the Bramford and immediately surrounding area. All of this has arisen since the project was paused back in 2013.

The situation today is very different to that of 2009-2013, yet we could see no updated documentation that assesses this changed landscape and the cumulative impact of all these proposals alongside that of the Bramford to Twinstead line proposed. We note that the cabling for the EA1 project was fully underground, with the mitigation on the landscape being a key factor for this decision.

With such a significant change in circumstances, it is disappointing that National Grid has not provided any assessment of this to the public. This is a significant error in the process, and has therefore limited the effectiveness of the consultation.

Summary

In conclusion we understand the need for the new cable route, however we believe the current proposal by National Grid is outdated to the changed landscape and community since the project was started in 2009 and subsequently paused in 2013, and that the non-statutory period to be insensitive to the circumstances that the pandemic has had on the public’s ability to be appropriately consulted.

We urge National Grid to reconsider the longer term and wider benefits of fully undergrounding the cable route, and hope to see this approach taken when the statutory consultation opens later this year.

Yours sincerely,



Samantha Main
Director