



Date: 18<sup>th</sup> August 2023

To Whom It May Concern,

I am writing on behalf of CARE Suffolk regarding the non-statutory consultation for the Norwich to Tilbury (N2T) pylon proposal by National Grid (NG).

We are a community group and have members in the villages of Bramford, Burstall, Elmsett, Flowton, Little Blakenham, Somersham, and Sproughton.

### CARE Suffolk Primary Position on N2T

We wish to start by stating that we agree with the need to transform our transmission network due to the shifts in how our energy is produced, but at the same time we must respect the landscape and countryside we all live in and share. Net Zero must not be at any cost or to the detriment of our countryside, local communities and natural environment. If the transition to low carbon energy is to succeed in the timely manner required, it needs to respect the communities that are being asked to host it.

In the words of John Pettigrew, Chief Executive of National Grid *"Business needs to stand for something more than simply profitability. Now, more than ever, we have a responsibility to demonstrate our contribution to society more broadly."*

There has been a significant increase in the number of industrial energy related applications in the area and local communities are bearing the brunt of these individually and cumulatively. The piecemeal approach has led to an overwhelming lack of co-ordination and a serious lack of safeguarding for local communities. This is despite a co-ordinated holistic approach to network design being proposed for East Anglia over a decade ago and still not appearing any closer to fruition. The N2T proposal here further compounds that lack of safeguarding.

CARE Suffolk maintains its preference for N2T is that NG scrap the proposal, and instead redirect those efforts into a co-ordinated offshore grid. It is widely recognised that the piecemeal approach to energy infrastructure, like this proposal, is like using a plaster to fix a broken leg. We understand that a co-ordinated off-shore grid would be more expensive, but it would also not be a like for like project. It would be wholly more ambitious than this outdated way of thinking.

Thus, CARE Suffolk continue to **STRONGLY OBJECT** to the current proposal.

### Assessment of the Current N2T Proposal

Without prejudice to our above statement, we have assessed the documentation specific to this proposal, attended the Copdock consultation meeting, attended some of the online consultations, and wish to put forward our thoughts on the proposal that has been put in front of us.

We note that other consultees such as Suffolk County Council have already highlighted deficiencies in the consultation process and whilst we support those we will not duplicate them here.

Our ongoing concerns relate specifically to the villages mentioned above, though we understand that some of our concerns are shared along other parts of the route.

Based on the information and proposal documents currently available some of our following previous concerns, submitted as part of the 2022 non-statutory consultation and so will not be duplicated here, remain unaddressed by this consultation:

- Over reliance on Bramford Substation
- Lack of public and project lifecycle costs taken into consideration
- Unknown carbon cost

Other areas of concern have changed primarily due to the change of route and a few new points have arisen, detailed further below, and are as follows:

- Cumulative impact at the Bramford area of the proposal
- Harm to heritage assets
- Harm to ecology
- Impact on Elmsett Airfield
- Criss-crossing of overhead lines
- Detailed siting consultation with landowners

#### Cumulative impact at the Bramford substation area of the proposal

This was an issue we raised in our submission to the 2022 non-statutory consultation. We note that the proposed change of route north of Flowton no longer goes through the designated Special Landscape Area and would no longer be in conflict with policy CL2 of the Mid Suffolk Local Plan 1998. Though this was not given as a reason by NG for the change.

However, all our other concerns for cumulative impacts remain as per our submission to the 2022 non-statutory consultation, in particular for the parish of Burstall.

#### Harm to heritage assets

This was an issue we raised in our submission to the 2022 non-statutory consultation. We recognise that NG has accepted that harm would have come to the Grade I listed building of St Mary's Church in Flowton if it had continued with the previous route, and that this consultation proposes taking the line to the north of Flowton instead. Whilst we do not believe this eliminates the harm, it is a significant reduction. In addition to this and not mentioned by NG, we also believe it is a significant reduction, but not elimination, in harm to Grade II listed buildings (Gates Farmhouse, Granary at Gates Farmhouse, and Valley Farmhouse all in Flowton) and a Non-Designated heritage asset (Flowton Hall, Flowton). However, it would now cause harm to the setting of Lovetofts Farm, Flowton (Grade II), and there is the potential for harm to St Mary's Church, Somersham (Grade I) and Church Farmhouse, Somersham (Grade II).

Due to the routeing close to Lovetofts Farm a new concern has arisen for us, which we believe warrants some additional consideration by NG. Lovetofts Farm is a 17<sup>th</sup> Century farmhouse that was built with no foundations. It is sensitive to underground vibrations that can be common from nearby construction work. We would like to see this assessed, but also believe it is likely to be a concern for other heritage assets along the route.

Our updated list of listed and non-listed heritage assets in our area that would, to varying degrees, be impacted negatively by the proposal include (but are not limited to):

Grade 1 Listed Buildings	Grade 2 Listed Buildings	Non-Designated Heritage Assets
St Mary's Church, Flowton St Peter's Church, Elmsett St Mary's Church, Burstall St Mary's Church, Somersham	Gates Farmhouse, Flowton Granary at Gates Farmhouse, Flowton Valley Farmhouse, Flowton Bleak Hall, Somersham Gunn's Farmhouse, Somersham Barn at Gunn's Farmhouse, Somersham Church Farmhouse, Somersham Canes Farmhouse, Burstall Burstall Hill Cottages, Burstall Half Moon, Burstall Barn at Whitehouse Farm, Burstall Mulberry Hall, Burstall Fenn Farmhouse, Burstall Tye Farmhouse, Bramford Bullenhall Farmhouse, Bramford Lovetofts Farm, Flowton	Burstall Hall, Burstall Flowton Hall, Flowton

Harm to ecology

This was an issue we raised in our submission to the 2022 non-statutory consultation. We believe the new route to the north of Flowton now avoids harm to the Roadside Nature Reserve 92 in Flowton. However, it now closely follows the ancient woodland at Somersham Park, which is a County Wildlife Site (CWS). We detailed in our previous submission the effects that overhead lines can have on wildlife and the impacts on this would need to be considered in line with the mitigation hierarchy.

Impact on Elmsett Airfield

This was an issue we raised in our submission to the 2022 non-statutory consultation. We note that NG has assessed a few airfields along the proposed route, but nothing we could see as yet for Elmsett Airfield.

Aircraft on approach to Elmsett Airfield pass over the open countryside space between the villages of Flowton and Somersham and would bisect the proposed route. There are existing 35m pylons in the area, but those proposed here are significantly taller at 50m. We are concerned about aircraft safety should the taller pylons and overhead lines be developed within this approach path. We understand NG has an aviation consultant and we would like to see the consultant reach out to Elmsett Airfield to discuss the proposal. It is important that assumptions are not made when it comes to safety, and speaking with the airfield operatives would enable NG to properly understand the nuances of how aircraft fly in the area and how they approach to land.

Criss-crossing of overhead lines

In the 2022 non-statutory consultation a proposed line was not available, only a graduated swathe. Now that a proposed line has been put forward we notice that the new 400kV route crosses the existing distribution lines of UK Power Networks. In the villages our members are in it does so six times. Going north it appears to do so another three times before reaching the A14.

At the Copdock public consultation we asked how this would be handled and two of the NG representatives stated they were looking at undergrounding in the area, and wanted to hear feedback from the community about this. Whilst they indicated they were looking at working with UK Power Networks to get the smaller existing distribution line put

underground, it would seem that the greatest reductions in impact would be achieved by putting this proposed 400kV line underground. If you were to underground the smaller distribution lines to remove their negative impact, but then build a larger line in their place then it is still an increase in harm overall. But to underground the proposed line would seem to have negligible long term harm, and any residual impacts would require less compensation.

The first consideration in the mitigation hierarchy is to avoid the harm. Putting the proposed 400kV line underground would avoid the landscape harm, avoid the cumulative harm, avoid the harm to heritage assets, avoid the harm to Somersham Park CWS if it were sited far enough away (we believe the recommendation is 50m minimum away from ancient woodland), and avoid the risk to approaching aircraft at Elmsett Airfield.

#### Detailed siting consultation with landowners

Regardless of the option that NG proceed with – offshore, underground, pylons, or a mix – we cannot express enough at how vitally important it is that NG have detailed discussions with landowners when it comes to the final siting of the route, including the placement of pylons. Trenching through a particular field entrance or putting a pylon even a few metres here or there may not be huge for NG, but for landowners this could make a big difference, especially for farmers who will be having to navigate and access their fields with their farm machinery for decades to come.

#### Summary

In conclusion we understand the need to reinforce the transmission network, but we urge NG to reconsider the longer term and wider benefits of a co-ordinated offshore grid and integrating this project as part of that approach.

The current option presented appears to create substantial negative impacts on the landscape, heritage, residents, businesses, and overall environment of this area, and indeed those along the full length of the proposal. Given the alternatives available, we see no compelling case for a 180km line of pylons and we are not convinced that NG have put forward the best option for the consumer.

*“...it will be critical to strike the right balance between the need to connect the growing amount of offshore windpower, the cost to UK consumers and the impact to local communities and the environment.”<sup>1</sup>*

We are not sure if National Grid continually overlook this point on purpose, or if they are simply oblivious to it, but it must be pointed out that the local communities are UK consumers too. The current proposal puts a highly disproportionate amount of the impact and indirect costs mentioned above on local communities. We are not convinced that the cost to UK consumers in this instance is the right balance, particularly when you consider that offshore options are being developed for the north of England and Scotland.

This proposal may be the preferred option for NG, but it is clearly not the best option for the UK public and the environment.

Yours sincerely,

Samantha Main  
Chair

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<sup>1</sup> Project Background Document June 2023 Page 15