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Date: 8th April 2013
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Brian Smethurst
Senior Project Manager
National Grid
Bramford to Twinstead Overhead Line
Project
By email

Dear Brian

Bramford to Twinstead Tee Connection Project – Substation Siting Options Appraisal

1. As you are aware, the Local Authorities work closely together on this project and Suffolk County Council therefore responds to this consultation to lend its support to submissions made by Essex County Council and Braintree District Council and their efforts to secure the least damaging solution to maintaining supplies to the local electricity distribution network.

Consultation

2. While the options preferred by National Grid and the Essex authorities, albeit different ones, only impact upon Essex, SCC wishes to record a number of points.
3. As alluded to in our response to the Scoping Report, we maintain concerns over the timeliness of the consultation on the options for the Distribution System. National Grid would have benefited from consulting on the alternative options in advance of announcing its preferred option, rather than the current sequencing which may raise the perception that National Grid is consulting on a predetermined outcome.
4. This issue is compounded by the fact that the draft substation siting study of 2009¹ downplayed the possibility of reasonable alternatives to a substation. Indeed the Executive Summary² states at paragraph 1.4 “in order to provide the necessary capacity and security of supply, the location of the new GSP **has to be** between Twinstead and Thaxted” [emphasis added]. The subsequent reports, notably UKPN’s report of July 2012³, indicate that this is in fact not the case - it is, to a greater extent, cost that has dictated that the substation option is preferred over, say, Option 5.1.2, and that other options which deliver “the necessary capacity and security of supply” are readily available.

¹ <http://www.nationalgrid.com/NR/rdonlyres/4FBDB5CC-6A74-44C9-ABBA-BD6D02E7EFE5/38039/SubstationSitingStudyDRAFTOctober20091.pdf>

² <http://www.nationalgrid.com/NR/rdonlyres/6B9A213A-CECE-47DB-8CC1-1C70B17FB551/38038/SummaryofSubstationSitingStudyOctober20091.pdf>

³ <http://www.ukpowernetworks.co.uk/internet/en/help-and-advice/documents/132kV-network-reconfiguration-to-accomodate-wider-systems-works-July-2012.pdf> Dated July 2012

5. The aforementioned 2009 report also cites the removal of redundant pylons west of Twinstead Tee as a benefit to the substation alternative (paragraph 2.13). This is now known not to be necessarily deliverable and this could have been clarified through the current consultation.

Compliance with Policy

6. National Grid's attention is drawn to Section 4.5 of EN-1 which explains the relevance of good design to electricity infrastructure, which should be "sensitive to place". It also notes that PINS will need to be satisfied that the applicant has considered not only functionality, but aesthetics "as far as possible". The Secretary of State reflects this in his comments at paragraph 3.31 of the Scoping Opinion.

Consideration of Alternatives

7. SCC reiterates its concerns raised through the scoping exercise, and to which National Grid's attention has been drawn by the Secretary of State (ibid, paragraph 2.58). Specifically, SCC has ongoing concerns that judgements on alternative options are being made with a significant emphasis on construction cost, ignoring evidence of long term disbenefits (which people are willing to pay to avoid). We would expect National Grid to be able to justify the costs of alternative options as set out in the Distribution Systems Options Report.
8. It is also important to remember that the issue of alternatives operates on a variety of scales, i.e. not just between substation X and substation Y, but also between the various alternative connection options.
9. The Environmental Statement will need to be clear as to why the substation option has been chosen, having regard to the *environmental* impacts of it compared to alternatives – again the Secretary of State has confirmed this point (ibid, Appendix 3).
10. SCC does not consider that because "it is the most efficient, co-ordinated and economical option with environmental impacts which are not expected to be unacceptable"⁴ necessarily follows this thought process, and thus will be an adequate justification for disregarding alternatives which may have significant environmental benefits.

Assessment of effects

11. The Secretary of State agrees with SCC that the Environmental Statement "should provide an assessment of the impacts of the proposed development as a whole to enable a clear understanding of the physical extent of the potential impacts arising from development" (ibid, paragraph 3.4).
12. Consequently, in confirming its preferred option for maintaining supplies to the local electricity distribution network, National Grid will need to consider how the impacts of any of the connection options combines with the impacts of the proposed overhead line/cable development.
13. It is understood, for example, that the Essex authorities' preferred option (5.1.2) could result in the removal of a significant number of 132kV pylons within Essex. This would potentially reduce the impacts of the proposed development *as a whole*. National Grid should therefore consider how its preferred option could compensate for the impacts of the scheme elsewhere (as it is proposed and, of course, notwithstanding the fact that SCC maintains that the entire route through Suffolk should be underground in any case).

⁴ Distribution System Options Report, paragraph 10.21

Substation Options

14. SCC would echo the comments of the Essex authorities as they relate to the setting of the Stour Valley. The eastern-most substation would be located approximately 1km from the Dedham Vale AONB and Stour Valley Project area. As the Secretary of State noted, assessments of landscape and visual impact should take in to account the proposed infrastructure's wider surroundings. This is of course equally relevant to assessments of impacts on cultural significance. Regard should also be had to the Dedham Vale AONB and Stour Valley Project's Dedham Vale Position Statement on development in the setting of the AONB⁵.

Regards

Michael

Michael Wilks

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⁵ <http://www.dedhamvalestourvalley.org/assets/planning/Setting-of-Dedham-Vale-AONB.pdf>