

Burstall PC presented at Issue Specific Hearing 2 on Wednesday 29th April, on the subject of Landscape and Visual Effect, including cumulative impact, mitigation and residual effects on the village of Burstall. We remain concerned about the lack of engagement, focus and the inadequate responses to the issues we continue to present.

In the hearing we specified that the landscape and visual cumulative impacts on the village of Burstall were possibly more than in any other area along the entire route given the concentration of infrastructure, including the Bramford to Twinstead reinforcement, focused at the Bramford Substation. Whilst this is not stating in any way that the impacts elsewhere are not unacceptable, it is testament to the fact that the wirescape, industrialisation and landscape impact proposed to Burstall is way beyond that which is acceptable (*'beyond the ability of the landscape to absorb'*). The ExA were reminded that the Bramford Substation sits on a plateau of the highest ground in the area, rising above existing land, and that the proposed pylon route follows the ridgeline of highest ground leading south of the substation. It was stated that this project could not be any more exposed to wide reaching views than that proposed by the applicant.

The Orchardlands area of Burstall has been completely 'islanded' as a result of the Bramford to Twinstead project and, should this Norwich to Tilbury reinforcement project go ahead, the rest of the village of Burstall will also be 'islanded', with pylons surrounding it north and south. This is not to mention all the associated and connected energy infrastructure development, approved and proposed, surrounding the substation impinging on and dominating the landscape as a direct result of the NG reinforcements.

We stated that the NG cannot continue to ignore these 'connected' developments, in particular the Brunfort BESS, and the fact that Bramford has become a highly visible 'super hub' of national significance.

The ExA was reminded that any landscaping and tree planting here would be too little too late to provide any meaningful mitigation to any of these developments – placing pylons on open high ground, as is the proposal, will result in an unmitigatable wirescape dominating the landscape and views from a wide area.

The response to our comments has been deficient in many ways, both at the hearing but also during the preceding months of this examination. At the hearing, NGET referred to App 122, para 6.1, the inadequacy of which is examined below. They also referred incorrectly to mitigation in the form of burying 3x 132kV, discussed below. Finally, they referred to laughably insufficient mitigation in the form of replacing removed trees and hedgerows with 'whips' and acknowledged the absence of an environmental area due to a 'lack of space' (*ironic given that there appears to be space for a 35 hectare BESS*). In fact in GEN1.15, they state *'no landscaping [at all] is proposed for Bramford*

Substation due to space constraints'. The fact that they are needing to be pushed by BDC and SCC to even consider providing some form of strategic landscaping and planting plan shows an absolute lack of interest in mitigating the impact for the residents of Burstall and the wider area.

This response is deficient in various ways, purposefully misinterprets and misrepresents the questions and issues we have raised and fails to acknowledge and provide adequate consideration of the valid and obvious issues. It proves that no efforts have been made whatsoever to apply the mitigation hierarchy in this area, and, that no efforts have been made to correctly assess the residual effects:

1. **App 122, para 6.1.1** - this paragraph is where NG state the problem which has been presented, however the issues have been misrepresented as follows:

- a. we never mentioned the connection *into* the substation, we stated that the pylons should exit in the east using GIL to transfer the HV across the substation, rather than exiting on the high ground in the west and traversing the entire frontage of the substation heading east until routing south. The financial and visual/ landscape saving here, which hasn't been acknowledged, is at least 5/6 pylons and a right angle direction change in the pylon route south.
- b. they state it is '*impractical and economically inefficient to relocate all the infrastructure*', however we never proposed this. We requested analysis on using GIL to exit the substation east. This is purposefully misrepresenting our proposal. As such we reiterate and request a fully worked response. More specifically, the '*proposed cable sealing end (CSE) compound/ substation construction compound*' and '*proposed construction lay down area*' designated to land just east of Bullen Wood, should be investigated as an exit route for the pylons through the use of GIL. Any costs associated should be compared with the cost saving as detailed above. Locating the pylon exit here would also save a route direction change as the pylons could route directly south with further cost savings. It is importance to note that this compound is also on lower lying ground (green on the contour map – Appendix A), so offers all the landscape benefits NGET have failed to apply.
- c. the further saving will be considerable given there will be no need to traverse the proposed 1.5GW Brunfort BESS. NG must provide a response to how they proposed to traverse this site, and further how the risk of having this quantity of batteries collocated and abutting the substation will be managed.

- d. there is no mention of the substation extension being placed on artificially made high ground west of the existing substation, void of any landscape cover and visible from long distances and from the Grade 1 church in Burstall.

2. App 122, para 6.1.2 - it is plain and obvious that the western substation extension is on raised ground compared to the surrounding area. NGET have referred to the contours on an outdated 1:25k map, which would never be large enough scale to show this localised rise in ground level, especially if it has recently been built up. Historic views have been provided (Appendix A) from Google Earth, as well as a contour map to show how this area has been raised and built up so that the extension remains at the same height as the existing substation. Previously the ground would have slipped away to the west – how else, with its current steep edges, could it have been farmed as arable land (see last photo in Appendix A)? The contour map shows that the extension should slope to lower lying ground – however it is, in fact, a level plateau. This has been done in full knowledge of the lack of mitigation possible by raising the ground level. Given the substation extension is part of this project, has this all been approved? The contour map also shows that the proposed pylon route follows the ridgeline high point (red) at all times until out of Burstall.

3. App 122, para 6.1.3 – The Brunfort BESS, is a proposed 1.5GW development spanning over 35 hectares directly south and adjoining the substation. This project is ‘live’ and in the public domain, however NGET responded by directing the ExA to paragraph 6.1.3 which clearly only relates to a separate BESS project (Clearstone BESS). At the hearing, NGET referred to ‘future proposals we are not aware of yet’, however there is a letter to NGET from Alcemi, the owners, in the document library; it is clearly listed in other submissions made to the NGET; and, it has been in pre-planning and on the Alcemi website for months. This misrepresentation and effort to avoid scrutiny of this huge and significant connected project is concerning and unacceptable. NGET have continually failed to provide any acknowledgement of this huge BESS proposed along the chosen route of pylons exiting the substation.

4. App 122, para 6.1.4 - there has been no acknowledgement of the proposed mitigation offered by moving the pylon route east as it travels south from the substation. The contour map clearly shows how even a small move east of a few hundred metres would adjust the pylon route from red to yellow and green contours. Any basic ground survey would identify this simple mitigation measure. Even a small move east would substantially help to reduce the impact to Burstall of the wirescape, as the ground falls rapidly. This would have a large impact on Burstall village preventing the views of pylons over the top of, and in the gaps between, the ancient woodland blocks, acknowledged by NGET.

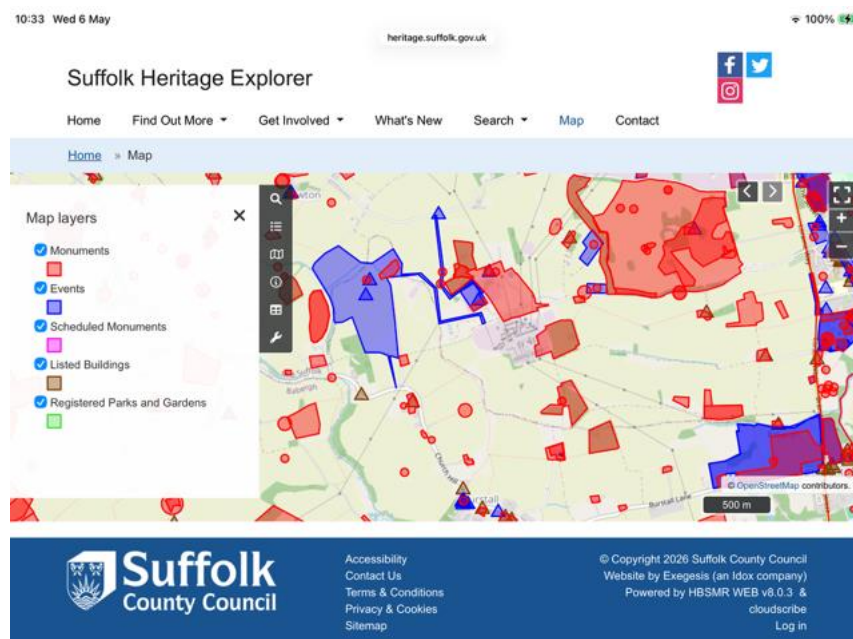
5. Burying 132kV Lines. NGET verbally stated that their mitigation to the wirescape in Burstall was to bury the 3x 132 lines. This is incorrect. The burial of the 3 x 132 lines is an operational requirement as the HV lines cannot cross these lines. This is not an act of mitigation. Replacing smaller pylons and lines with more numerous and much larger pylons and lines mitigates nothing. As such, this needs correcting to show that there is no mitigation currently offered to Burstall and the Bramford Substation.

6. Required Visualisations. As such, we request the following visualisations:

a. The proposed view of all the pylons from exiting the substation south until they depart Burstall Parish south of the A1071. This view should be from various locations along Hall Lane, Burstall and various footpaths south of the substation.

b. The view, if changes proposed by Burstall PC are made - exiting the substation east, running the pylons directly south and adjusting the positioning of this pylon run east onto yellow and green contours. It should be noted that if the HV pylons are buried rather than the 3 x LV pylons, our preferred option, the current view will be unchanged.

7. Historic Landscape Character. Burstall PC also wish to highlight that the overall impact/ effect to the historic landscape character of Burstall has been understated and must be taken into account cumulatively. The NGET study is deficient by omitting a number of historic sites, as shown in the map below which must be included and taken into account. As such, the moat and hall at Burstall Hall, listed as Suffolk Monuments should be included, as should the archaeological finds at Orchardlands.



<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-000295-5.15%20Design%20Development%20Report.pdf>

8. 12 Minutes. A totally insufficient 12 minutes of time has been dedicated to the cumulative and visual landscape impact at the Bramford Substation and Burstall village during this examination and the only mitigation offered is to remove some smaller pylons only to replace them with larger ones and to replace the mature trees which will be removed with saplings which will take decades to grow. Given the magnitude of this project and the significance of the Bramford Substation, we consider this vastly inadequate. Further, the absence of an accompanied site visit to Burstall and the Bramford Substation suggests an acceptance of the devastating impact and a lack of interest in engaging with pragmatic solutions, as described. This fails every test possible in terms of the purpose and aims of a review and its corresponding duty of care. We feel that a site specific hearing dedicated to the Bramford Substation and Burstall is not only justified, but entirely necessary.

In summary, there is widespread inaccuracy and discrepancies in NGET's feedback. We believe they are 'running down the clock', knowing the many issues raised cannot all be interrogated sufficiently in the time allocated. We believe NGET is failing in its corporate responsibilities and duty of care. We can find no reason why the changes we propose cannot be implemented. Far from increasing the cost, there may well be savings. This is hugely disappointing.

Burstall is still rural and proudly retains a historic landscape character, but this is in real jeopardy. We have offered various pragmatic and meaningful ways to lessen the impact to ensure the damage is limited, however no adequate responses have been received:

1. Exit the substation east not west to use lower lying ground, save 5/6 pylons and avoid traversing a 1.5 GW BESS.
2. Mitigate the HV lines by either burying them rather than the LV lines, or moving them to adjacent lower lying ground.
3. Offer resilience by dispersing and concealing infrastructure where possible.
4. Correctly assess and mitigate the impact to the historic landscape character.

Appendix A

1. Contour map.



2. Substation extension west showing artificial raising of ground and lack of mitigation (2008-2025). Photo on the next page clearly shows the raise ground of the extension on what used to be an arable field.

