

Thank you for the notification of the consultation in relation to the above Draft Development Plan. I am responding as a concerned resident living at 20 Casaeldona Gardens, Belfast BT6 9RQ - which is sited beside and under Tower 43 and its overhead lines. I am part of the committee that also represents many residents of the Marlborough Heights housing development, and particularly the homes that have Tower 42 and lines overshadowing their houses and back gardens – Belfast BT6 9PL. These 2 towers and lines form a connection between Castlereagh Main and Rosebank Substation.

In January 2022 I received a letter from TLI Group, who, subcontracted by NIE Networks, outlined a scheme of work to replace the lines (conductors) which would take around 4 weeks sometimes in February-March 2022. In 1943 the towers and lines were erected in the fields of the Castlereagh Hills, but today Towers 43 and 42 are landlocked by homes and gardens. After speaking to the NIE Networks helpline more questions arose from my conversation than answers given – in fact this is an ongoing experience with both NIEN and SONI. For example, at first I was told that the Castlereagh (CR) to Rosebank (RB) had not been energised since 1969. My wife and I moved into the newly completed 20 Casaeldona Gardens in December 1974 and as our family grew up we were certainly aware of the lines being energised especially at the peak 18.00 time. So through contact with Cormac Mc Camphill, the NIEN Customer relations manager, I was more ready to accept that the lines had not been energised since 1989. To me this begs 3 questions to be answered by NIEN.

BEARING IN MIND THAT:-

(a) In 2023 the towers and lines will be 80 years old and are now showing very visible signs of rusting in the lower struts and legs

(b) in all this time Tower 43 was anti-rust painted around 1982 and in the summer of 2021 workmen washed it down chemically in preparation for its 40 year (?) makeover, but have not been back!

(c) The old brown insulators were replaced with new glass ones, with one of my garden fence poles being broken in the process – NIEN, without admitting liability, covered the £60.00 repair cost.

(d) Recently Cormac was helpful in providing me with original documents that enabled me to understand that Tower 43 is a Permanent Easement and as such NIEN ought to have EXERCISED THEIR RESPONSIBILITY in inspecting the site to ensure it was secure from children playing in the street – I.e. fenced off and kept clear I.e. had not become a fly-tipping dump.

(e) ON ACCOUNT OF NO WRITTEN COMMUNICATION TO ME FROM NIEN OVER THE LAST 48 YEARS I HAVE KEPT THE SITE FENCED OFF, CLEAN AND USED IT AS A VEGETABLE GARDEN – and even when the above works were carried out no-one said that I should not have done so as the ground belongs to NIEN.

(f) My fellow committee members in M. Hts. under Tower 42 have had some visits by NIEN to spray weedkiller and check the wooden fence around its base – though not always warning the residents of their visits!

(g) Today as well as dealing with the huge increases in electricity charges, residents such as ourselves living under towers and lines have to DEAL WITH THE HIDDEN COSTS THAT NEITHER NIEN OR SONI EVER MENTION – the risk to health, damage to houses, gardens, washing, cars, roads and pavements from bird droppings; the depreciation of property values; difficulties in selling your house with evidence of mortgage companies refusing loans to prospective buyers because of the proximity of towers and lines.

**QUESTION 1 – WHY HAVE THESE TOWERS AND LINES BETWEEN CR AND RB NOT BEEN REMOVED**

- 33 years standing unused ? Does the underground cable installed a few years ago from CR at Manse Rd to RB at Ballygowan Rd not do away with the need for the overhead lines – OR has there been a design flaw or miscalculation in the capacity of the cable - with the lines been seen as a reserve measure?

Question 2 – What towers and lines has NIEN IN FACT REMOVED in its history; what exactly is its stated policy and who makes the decision? In the Draft on Page 34 there are MERELY 4 Removal projects mentioned – NONE INCLUDE TOWERS AND OVERHEAD LINES.

Question 3 – Is NIEN hindered/obliged in some way by SONI to keep such aging and deteriorating infrastructure in place because of its indecision and clarity as to what is requires in the short(?), medium(?) or long (?) term.

The perspective and experience of my friends in Marlborough Heights is expressed and coloured by the following:” this line has been decommissioned/inactive since c. 1988 and we have confirmation from SONI THAT IT IS CURRENTLY “NOT CONNECTED TO THE SUBSTATIONS AT EITHER END.” Marlborough Heights development was built in the 1990’s and all the residents bought their properties with the implied knowledge that this line was not active.

In the TPNI21-30(as referred to above) in Section 7.2 (Page 76) the following is quoted:

*“RP6 110kV Tower and Overhead Line Maintenance (T19) This project includes conductor replacement on the Castlereagh – Rosebank and Donegall - Finaghy 110kV circuits, as well as wood pole replacement, tower maintenance and tower and foundation condition assessments elsewhere. Completion date: Before 2024.”*

Contractors (TLI Group) appeared in January 2022 to prepare for this replacement work and when questioned were advised that the line would, in all likelihood, be recommissioned to increase the voltage load for the new Sydenham Road Project. NO PUBLIC CONSULTATION HAS EVER BEEN HELD WITH MARLBOROUGH HEIGHTS RESIDENTS OR THOSE ALSO IMPACTED IN CASAELDONA BY EITHER SONI OR NIE NETWORKS.

Given the close proximity of the towers and lines to homes and a Primary School I hereby wish to contest this planned work for the following reasons:-

1. The well-publicised detrimental health impacts of Electromagnetic fields coming from transmission lines, especially in relation to children
2. In the recent past a 110kV cable was laid underground down Church Road to facilitate power transfer from Castlereagh Main to Rosebank Substation. Why can this approach not be followed again?
3. The Belfast Metropolitan Project will proceed with underground cables rather than upgrading current overhead tower lines – given the precedent in Point 2 this approach should again be adopted.

The residents committee in place, along with political representatives, contacted SONI and NIEN in January – within their Consultation period for this plan. One week before TLI Group, acting on behalf of NIEN, were due to start replacing the lines/conductors SONI “ADVISED” NIEN to cancel the

contract - the consequence being (a) TLI said they believe the work will" never be done" (b) NIEN said it has been "Postponed" until SONI carries out a review to be completed by the autumn of this year. However our communications were not admitted as part of the Consultation process as the required approach was not followed by us. (I.e. using their online form, which they did not explain we should use before the deadline)

Therefore please accept and register this email as contesting the RP6 upgrade as part of SONI'S TPDNI 21-30 PLAN.

Personally speaking I am not concerned about any confidentiality issues, and would be very ready to "consult" and "engage" with you, the Utilities regulator on any matter concerning my communications with SONI and NIEN. For organisations that claim to be working "in the interests of the consumer" they do not appear to co-operate and co-ordinate satisfactorily at times – imagine the consequences of a resident planning ahead and thinking of putting their house up for sale in the coming months – WITH 2 ORGANISATIONS IN THE BACKGROUND THAT FAIL ABYSMALLY TO CONSULT AND ENGAGE WITH ALL STAKEHOLDERS.

I spent time reading the 14 submissions to SONI about the 21-30 Draft plan. One was from Lisburn & Castlereagh City Council, and I quote Conor Hughes their Head of Service Planning & Capital Development:

*"The Draft Plan speaks to the future of investment in infrastructure and there is a proposal to underground the overhead lines on the Castlereagh Hills. This investment and its inclusion in the Plan is welcomed."*

This was obviously very significant to M.HTS and Casaedona residents.

HOWEVER, ON EXAMINING SONI'S REPOSSES TO THE SUBMISSION, LCCC'S DOES NOT GET ANY MENTION WHATSOEVER OR A RESPONSE FROM SONI. FURTHERMORE SONI INFORMED US BY EMAIL THAT LCCC HAD GOT IT WRONG – BUT SONI DID NOT EXPLAIN TO US HOW OR WHY LCCC WERE MISTAKEN. I TRUST THESE VIEWS WILL RECEIVE FAIR CONSIDERATION.