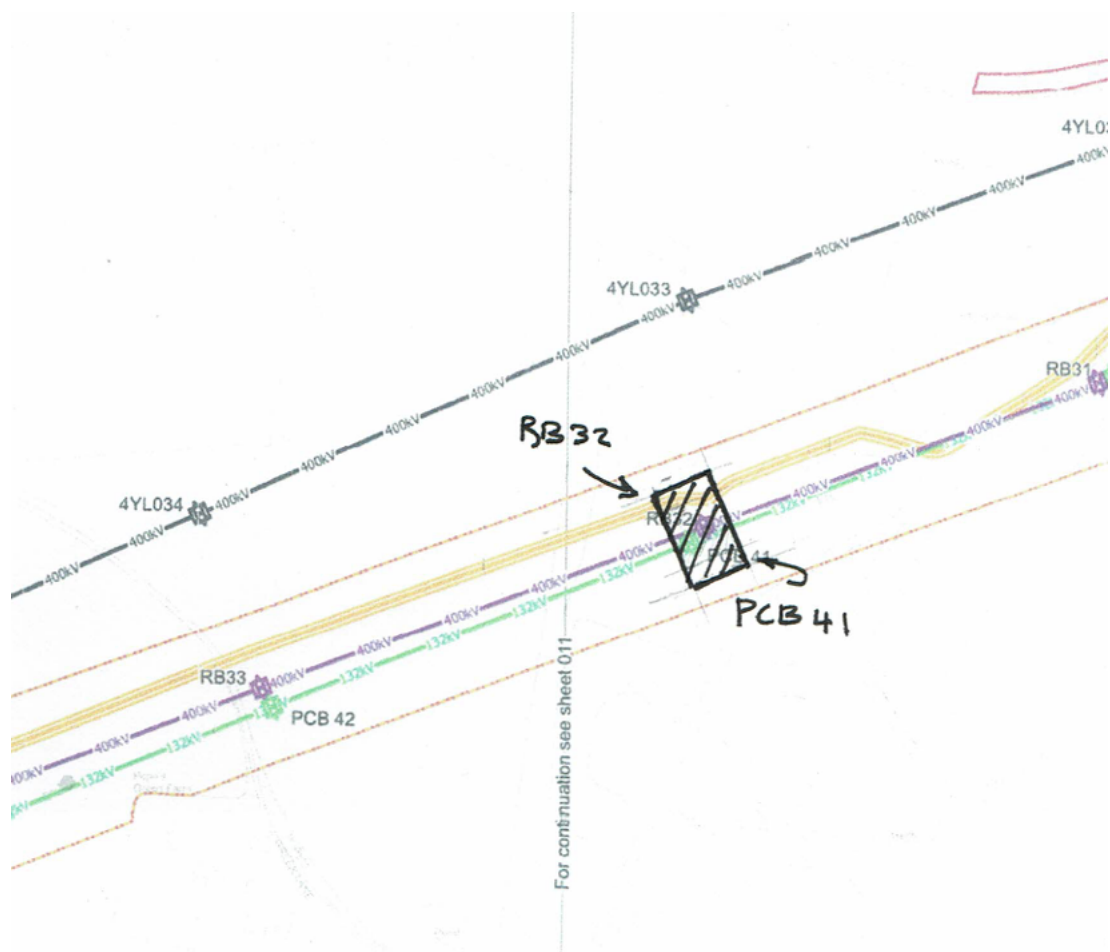


The Parish Councils of Assington, Bures St Mary, Leavenheath, Little Cornard, Polstead & Stoke by Nayland

Additional Supporting Information and responses to Deadline 5 submissions

1. Context

- 1.1 The parish councils have reviewed depositions made by the applicant, by Suffolk County Council and by Babergh & Mid-Suffolk District Council in response to our various submissions. This note has been prepared to provide additional argument in support of siting the DV East CSEC in a position within Layham Quarry immediately adjacent to its western boundary.
- 1.2 This note should be read in conjunction with the parish councils' earlier submissions including (i) our Combined Response to the Statutory Consultation dated 18th March 2022, (ii) our Interim Combined Response to ExA's first written questions [REP3-079], (iii) our Written Comments following Specific Hearing 4 etc [REP4-016], and (iv) Further Written Comments on CSEC following Specific Hearing 4 [AS-010].
- 1.3 For the avoidance of doubt, the proposed CSEC re-siting is indicated below. Clearly, its precise location would be determined and finessed by detailed site assessment, but we consider this suggested location – coincident with planned works (a) to remove pylon PCB41 and (b) to install new pylon RB32 – adequate and appropriate for the purposes of making comparative assessments between the Layham Quarry and Millfield Woods sites.



2. Relocation of DV East CSEC to Layham Quarry

- 2.1 We do not propose to reiterate all of the numerous benefits and advantages associated with relocating the CSEC to a previously worked section of the quarry, which have been detailed in our earlier submissions and which have not been challenged by the applicant. We will instead focus on the potential planning constraints identified by Babergh DC, in particular in relation to (i) designated Special Landscape Areas, (ii) drainage issues and (iii) protected species known to be present in the quarry.
- 2.2 In passing we note that Suffolk CC has stated a view that it would have no objection from minerals planning, highways, PROW or archaeology perspectives to the siting of the CSEC within the quarry at the location proposed, subject to landowner consents and presumably careful detailed engineering work on optimising the location. SCC defers to Babergh on landscape and ecology issues.
- 2.3 Firstly, it is important to note that **the applicant's current proposals before the ExA already make significant impacts on the quarry**. The applicant proposes to open up a longitudinal haul road through the worked section of the quarry of some 700metres length, and to clear construction sites for the removal of three existing pylons and the installation of three new pylons. We estimate the total area of the worked and revegetated quarry sections subject to planned disturbance to be of the order of 10,000 sq metres, approximately divided between the proposed haul road and the pylon sites.
- 2.4 The CSEC site proposed would be coincident with the proposed construction site area for pylon RB32. A drawing of the DV East CSEC plans and elevations has been provided by the applicant and shows a site measuring 70 x 40metres, an additional area of approximately 1500 sq metres over that required for removing and constructing the pylons, and **an increase of approximately 15% in the area of the quarry already subject to planned disturbance**.
- 2.5 The contractor may also require an addition area to serve as a temporary camp for constructing the CSEC, but this could be located in an area of the quarry close to the access point as a part of the contractor's temporary site management and security requirements. This is already a heavily trafficked area and would not therefore result in additional disturbance to any revegetated parts of the quarry.

3. Special Landscape Area

- 3.1 We note that while part of the Layham Quarry falls within the Layham Pit Woodland & Meadow County Wildlife Site, parts of which will need to be pruned, coppiced or removed to accommodate new pylons RB30 and RB31. **No part of this designated site would be affected by moving the CSEC to the suggested location along the western boundary**. Although other designated sites exist outside of the quarry boundary (as shown in APP-018), none of these designated landscape areas would be affected by planned works in or around the quarry.
- 3.2 In terms of SLA impacts, there is no material difference therefore between the Millfield Woods and Layham Quarry sites from our understanding of matters. We do note that, unlike the Layham Pit woodlands, Millfield Woods North and South, which abut the currently proposed CSEC site, carry an Ancient Woodlands designation in addition to also serving as County Wildlife sites.

4. Drainage

- 4.1 It would not be unusual for worked areas of a quarry to create areas of ponding, and there appears to be some evidence from the plans of small areas of localised standing water. Since the quarry was exploited for sand and gravel, a generalised view would suggest that storm water

drains easily through the ground and away from the quarry to the east without creating a widespread drainage concerns or ponding.

- 4.2 We note that our suggested site is clear of any such ponds (to the extent that we can determine). A review of the DV East CSEC Design & Layout Plans [APP-023] reveals that all of the electrical components are elevated at least 3metres above the ground, that no ground level structures other than discrete concrete plinths and steelwork bases are proposed, with what we assume to be permeable (gravel) infill between the plinths. No underground structures appear to be planned.
- 4.3 Accordingly, the new infrastructure associated with the CSEC would not in our view contribute to the risk of flooding. Furthermore, at any site, good engineering would ensure that the risks of flooding are mitigated, for example by slightly elevating the ground formation level from which the new infrastructure is constructed and by providing additional peripheral bunding and surface and sub-soil drainage (if required).
- 4.4 In summary, standard engineering approaches to design should ensure that construction and performance of the proposed CSEC is neither effected by drainage issues nor contributes to them. Accordingly, there is no difference between the Millfield Woods and Layham Quarry sites.

5. Protected Species

- 5.1 The applicant's submission documents record details of the protected species at both Millfield Woods and Layham Quarry. It is clear that there will be temporary disturbance to protected species regardless of where the CSEC is sited, noting that some 10,000 sq metres of the quarry is already planned to be disturbed by the scheme.
- 5.2 It is our belief that a 15% increase in the area of planned disruption to the quarry site as a result of re-siting the CSEC is not sufficient to justify withholding of a "Letter of No Impediment" to the licences for Dormouse, GCN and Bats by Natural England. The modest additional footprint created by the compound combined with adoption of the applicant's reinstatement proposals should actively encourage repopulation following construction regardless of which site is ultimately selected.

6. Summary of supporting information on DV East CSEC

- 6.1 In relation to the three matters raised by Babergh as matters for concern, we can find little difference between the two CSEC sites. Our previous submissions have made clear the reduced adverse effects on local communities and significantly reduced visual impacts of careful re-siting the CSEC in the quarry, as well as localised beneficial effects on preserving agricultural land and on a listed property.
- 6.2 Our proposals are also wholly consistent with the applicant's statutory duty in relation to the preservation of amenity under schedule 9 of the Electricity Act, in particular to the Horlock and Holford Rules for planning electrical infrastructure.

7. Undergrounding through Section F

- 7.1 We note the applicant's response to our previous submissions in REP5-025 (6.2, ref 3), but fear that it continues to demonstrate unwillingness to engage with our reasonable proposals, and fails to contribute towards a detailed cost-benefit analysis of our proposal to underground through Section F.
- 7.2 The applicant is silent on our contention that the duty to preserve designated landscapes extends beyond the precise physical boundary of the landscape, yet the applicant's own decisions elsewhere in this application, and in its planning for the Great Grid Upgrade Norwich

to Tilbury project, demonstrate acknowledgement of this duty. We respectfully request that the ExA challenge the applicant on its assertion that undergrounding in Section F cannot be justified in policy terms.

- 7.3 We lack sufficient data to challenge the statement that underground cable costs four to ten times more than an overhead equivalent. However, we believe that much more granular detail is required in order to assess our proposal adequately: given the precedent elsewhere for undergrounding outside the immediate boundary of AONBs, a cost-benefit analysis is required to evaluate incremental measures to reduce harm. The cost data required would be specific to the location in question, and must include the substantial savings from removing two CSECs, including provision of access to them, their acquisition, and their operation and maintenance over the lifetime of the asset.

8. The proposed access road to SV East CSEC from the B1508

- 8.1 We note the applicant's unwillingness to accommodate our proposal to use the existing road access and track to reach the proposed SV East CSEC.

- 8.2 In support of our proposal, we highlight policy LC03 of the Little Cornard Neighbourhood Development Plan, which covers the protection of important views. The applicant's proposed route for the permanent access road is currently within the area covered by the Plan, which was adopted by Babergh in 2022. Views from the Little Cornard area of the B1508 and Spout Lane would not suffer impact from our proposed access road through the field, where no current screening protects from either Spout Lane or the valley.