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Subject: Request for more detailed assessments by the applicant
Date: 18 December 2023 13:10:34
Attachments: [Joint submission requesting more detailed assessments by Applicant.pdf](#)

Good afternoon Jake,

As the group of parish councils, we attach an urgent request to the ExA to require further assessments by the applicant of our proposed changes to the scheme. We are currently finalising our D6 submission, but given the tight timelines before the publication of ExQ2, we thought it appropriate to make this request now.

Please let me know if you would like us to submit also through the online portal.

Many thanks and - if we don't speak again - all the best for the festive season.

Best regards

TH

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

Further written comments on Applicant's Proposals following review of Bramford-Twinstead (EN020002) Submissions Deadline 5

1. Context

- 1.1 The parish councils have reviewed submissions made by the Applicant, by Suffolk County Council and by Babergh & Mid-Suffolk District Council in response to our various submissions. In our opinion, these have highlighted inconsistencies and shortcomings in the scheme development and appraisal by the Applicant, as set out below.
- 1.2 In order to eliminate any misrepresentation of the case for additional undergrounding and the re-siting of the DV East CSEC to a more appropriate location, the parish councils now write to formally request that the Examining Authority instruct the Applicant to provide detailed evaluations of the environmental advantages and threats associated with our proposals. This will provide the ExA and the statutory authorities with a more detailed and balanced view of the changes that we seek to make to the scheme.
- 1.3 We accept that our proposals for additional undergrounding will increase the overall cost of the scheme but hold that those additional costs need to be validated (as a minimum, by the ExA) for effective cost-benefit. To the extent that the benefits can be measured, we are confident that the ExA will find that the social and environmental advantages of our proposals will substantially out-weigh any additional costs.

2. Undergrounding through Section F

- 2.1 We note that the Applicant has elected not to address the matters raised in our various submissions, in particular on the subjects of (i) the impacts of new much larger 400kV towers through Section F on the setting of the AONB, or (ii) any reasons why the decision made by the Applicant to underground a similar length of the proposed Norwich to Tilbury line through Great Horkesley close to but outside the southern boundary of the AONB is not equally applicable here.

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

- 3.1 From what we understand, the Applicant has not addressed in any detail the proposed alternative access arrangements promoted either in our most recent submissions or to consider the submission from Mr Shelley [REP5-040] regarding the impacts on an important local business. The question of permanent access is one that we believe should be addressed and finalised now with weight given to local feedback, and not left to cosmetic treatment to be provided at some future point via REAC.

4. Relocation of DV East CSEC to Layham Quarry

- 4.1 The Applicant's response [REP5-031] to our Deadline 4 submissions neither acknowledged nor addressed the many social and environmental benefits of relocating the CSEC into Layham Quarry, and we assume therefore that, apart from the additional costs involved, they believe that the proposal is viable from an engineering standpoint and advantageous from the perspective of environmental advantage points.

- 4.2 We are concerned that, having acknowledged that it had conflated two discrete proposals in its reporting on the assessment of alternative locations, and that its evidence on this matter was *“incorrect”*, the Applicant asserts that it does not consider this error *“materially changes [its] conclusions”*. We disagree. We consider the assessment of the Layham Quarry option by the Applicant to be superficial and incomplete for the purposes of enabling detailed examination.
- 4.3 We note that, in its response to our submissions, Suffolk County Council [REP5-033] would have no objection to the principle of siting of the CSEC within the area identified in the quarry. This appears to be a shift in its position as set out in draft Statement of Common Ground.
- 4.4 We also note that SCC defers to Babergh DC on matters such as ecology and landscape, and that Babergh, in its response [REP5-030] acknowledges the communities concerns and *“would have no objection to the submission of further information demonstrating assessment of the quarry location option in terms of all material considerations should the ExA deem it appropriate”*.

18 December 2023