

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

Response to the Applicant's reply to the Parish Councils' Deadline 6 submission regarding proposed works in Sections D/E & F

1. Context

- 1.1 We note that the Applicant responds to our submissions at Deadline 6 [REP6-060 & REP6-061] at Table 7.2 in its Deadline 7 submission, referenced as Document 8.9.4 [REP7-026].
- 1.2 The purpose of this note is to reply directly to what we regard as deficiencies in Table 7.2 of the Applicant's response.

2. Relocation of the Dedham Vale East CSEC in Section D/E to Layham Quarry

- 2.1 We note that the Applicant has not sought to challenge any of the many new and detailed observations raised in either of our [REP6-060 & REP6-061] submissions, relying instead on its earlier responses [REP3-048 & REP6-045] to our prior submissions, and on the limited and, as we have previously suggested, incomplete information contained in the Applicant's options appraisal report.
- 2.2 **Accordingly, and in the absence of challenge, we invite the ExA to conclude that the Applicant concurs with our assertion that relocation of the DVEast CSE compound into and alongside the boundary of a worked-out section of Layham Quarry represents a superior and less damaging siting than the currently suggested location alongside Millwood Road.**
- 2.3 The Applicant asserts that the proposed site for DVEast Cable Sealing End compound is approximately 1km from the boundary of the Dedham Vale National Landscape [REP3-048, Table 3.1]. This is disingenuous: while the boundary is 1km away when measured from the west, the proposed compound is only 350m from the boundary when measured from the south. This proximity, along with the new 400kV pylons that would be required immediately to the east of Millwood Road, represents a negative impact on the setting of the National Landscape, an impact that is totally extinguished by relocating the CSE compound to the quarry.
- 2.4 In the same table, the Applicant suggests that siting the CSE compound between the two halves of Millfield Wood will reduce its visual impact. However, the response does not address the visibility of the compound whilst travelling for a distance of about 1km along Heath Road, or for a distance of about 500m along Millwood Road where the presence of the compound's massive steel structures would be both out-of-character in the rural landscape and impossible to shield or soften through landscaping. Again, these impacts would be similarly extinguished through relocation to the quarry.
- 2.5 We note the applicant does not respond to our contention that the Horlock Rule requirement to *'take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum'* would be well served by re-siting the CSE compound to the quarry on land already well below the agricultural lane to the west of the quarry, using bunds to the west and south, topped by mature vegetation, and thereby demonstrating *minimum intrusion into the surrounding areas*.
- 2.6 Contrary to the Applicant's assertion that *'there may be potential effects'*, the use of the NW corner of the quarry will not have an impact on the Layham Pit Woodland and Meadow Wildlife site, sites that are already subject to *'potential effects'* by planned overhead pylon and line works. The Applicant's own survey data referencing the distribution of protected species within both the Layham Quarry and Millwood Road sites are equivocal. The undergrounding of lines

across the open land between the two sections of woodland would represent a temporary disturbance no greater than in other sections of undergrounding, as opposed to the permanent changes associated with building and operating the Millwood Road compound.

- 2.7 Table 7.2 of REP7-026 also refers back to REP3-048 Table 3.1, where the Applicant cites mineral rights as contributing to the decision not to use Layham Quarry. Given that (i) Suffolk County Council, as minerals authority, has raised no objection to the use of Layham Quarry, to the impact on existing consents and permissions or to safeguarding known deposits, and (ii) our proposal to use only a worked-out part of the quarry site along its western boundary, we infer that the Applicant no longer wishes to rely on this justification.
- 2.8 During the early stages of the Examination process, the Applicant objected to our relocation proposal based in part on concerns from Babergh District Council and Suffolk County Council regarding protected species and mineral rights. In reality, the proposal has never been seriously presented by the Applicant as an option, and it has therefore never been meaningfully assessed by the authorities.
- 2.9 Instead, we have systematically addressed any possible concerns and re-assert that Suffolk County Council no longer objects to the proposal on mineral grounds. The Applicant's inability to rebut factually any of our other arguments suggests that there is no longer any substantive objection to the benefits of our proposal.

3. Proposal for further undergrounding through Section F

- 3.1 In Table 7.2 of REP7-026, the Applicant refers to the replacement of the existing 132kV line by the proposed development. This fails to address the significantly higher impact of the taller pylons on medium- and long-distance views – ie those that benefit least from local screening by geographic features and vegetation – and which are exactly those that we believe need to be protected to minimise the impact on the National Landscape and Stour Valley, and their setting. We believe that the Applicant's explanation on this point fails to account for its differing approaches between the current application and Norwich to Tilbury.
- 3.2 In the same table, the Applicant relies on purported characteristics of the landscape in Great Horkesley compared with our sites of interest on the Bramford-Twinstead route. However, our contention is that the Great Horkesley example establishes the **principle** that, while undergrounding always carries incremental costs, it can be justified even outside designated landscapes in order to protect the setting of the National Landscape. This Applicant's reliance on the boundaries of the dedicated landscape to limit undergrounding is thereby called into question.

4. Access to SVEast CSE compound from the B1508

- 4.1 The Applicant reiterates its previous position that the proposal is not yet sufficiently detailed to warrant modifying the proposal at DCO stage. The Applicant appears to have ignored our central point that this is not a landscaping/mitigation/design issue to be addressed at a future date via commitments in the REAC and subject to yet-to-be-completed detailed designs. This is an access road alignment matter and relates to the selection of appropriate private land over which powers are to be granted for the provision of an access road of significant length.
- 4.2 In the absence of challenge to the substance of our proposal – that the current road alignment harms long views from the Stour Valley Project Area and therefore also its setting – we contend that this concern is sufficiently material to justify consideration at this stage and over which we ask the ExA to recommend a specific amendment to the scheme in response to local consultation requests.

5. Incremental costs of additional undergrounding (Section D/E & F)

- 5.1 The Applicant asserts that the cost of undergrounding transmission cables is between 4 and 10 times the cost of overhead lines and pylons but does not elaborate further, citing commercial sensitivity. Nevertheless, the Applicant quotes at REP3-048 Table 3.2 an additional cost of £16 million to extend the undergrounding by 800 metres to reach the quarry. Without a rationale or explanation, it is impossible to accept that this is a realistic figure. Only a full cost-benefit analysis of the options could support the Applicant's lowest economic cost argument in favour of not increasing the underground line section.
- 5.2 The Applicant refers back to its response to Babergh District Council's LIR [REP3-051] and to the 2012 Connection Options Report ('COR', APP-164) in this response. A cost-benefit analysis to assess the merit of incremental undergrounding clearly makes the cost differential between the options vitally important. Given that the COR predates the final decision to underground Sections E & G in full, we request that the ExA request confirmation from the Applicant that the capital costs of £111.8m (underground) and £8.4m (overhead line) given in §3.2.2 of REP3-051 fully reflect that the underground option would remove the need for the acquisition, construction, provision of access to, maintenance and operation of two CSE compounds.
- 5.3 We are concerned that the only costing data put forward by the applicant to object to our proposals are based on the 2012 COR and appear to be based only on scaling of high-level per-kilometre cost estimates. Since 2012, scheme details have been developed considerably, and we request that ExA take steps to assure us and itself that the additional costs being quoted for additional undergrounding in Sections D and F are based on internally consistent unit construction costs and are realistic.