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

Strategic Options, TS Conductor & Impact of Proposed Bramford to Twinstead Reinforcement Works

Response to Applicant's Submissions at Deadlines 8 & 9

1. Context

1.1 Further to the various responses received from the Applicant at Deadlines 8 and 9 in relation to strategic options and impact of the proposed works, we write to set out our final observations on the Applicant's B2T proposals.

1.2 Our conclusions are provided in summary form. We have endeavoured not to repeat the arguments raised in our earlier submissions; however, this paper should be read in conjunction with those earlier submissions.

2. Strategic Options and the use of High-Capacity Conductors

2.1 To the extent that we are able, we have sought to understand the technical and practical arguments raised by the Applicant in defence of its proposals, notably in its "Needs Case" [APP-161]. We appreciate that, in due course, the East Anglia region will become a significant exporter of thermal capacity to the national transmission network. We also understand from non-technical and conceptual perspectives the economic importance of maintaining thermal export and stability limits. However, we have no time, resources or capacity to carry out the detailed technical studies that might validate all of the assertions and arguments advanced by the Applicant in defence of its strategic selection.

2.2 Since learning of the development of new high-capacity conductors, our overriding concern has been to understand if and how such technology might be applied in a manner such as to obviate the need for the additional 400kV pylon line altogether, along with the attendant impacts on our communities. This advanced technology is surely an opportunity that should be explored to its fullest possible extent.

2.3 In that vein, we request that the ExA recommend that a detailed exercise be commissioned to explore how emerging technologies might by applied to eliminate the need for this second transmission line by testing the arguments advanced by the Applicant. Such a study should be conducted by independent specialist consultants before the SoS is asked to grant the necessary Consent Order for any works.

2.4 In relation to the Applicant's response [REP8-036], we note that:

- At paragraph 7, the Applicant asserts that, if B2T were reconductored to the higher capacity, then all other regional transmission circuits would need to be similarly reconductored. We find this argument difficult to understand since it appears to assume that both new higher capacity circuits being carried between B2T either side of the existing pylons would develop simultaneous faults. We question how realistic this likelihood is, especially if it is based on some form of catastrophic pylon tower collapse. The submission also fails to explain why the apparent need for wholesale reconductoring stops at the regional boundary.
- At paragraph 8, the Applicant appears to assert that both higher capacity circuits would need to be split into two separate connections at the switching station to maintain standard 5000A continuous ratings. We fail to understand why this would be more onerous on the provision of switching station equipment than that required to service the current proposals.

- At paragraph 9, the Applicant discusses stability limits and impedance across the network. These complexities are beyond our level of appreciation, but we wonder whether other advanced technology solutions may not be available to mitigate such concerns.

2.5 The foregoing issues might form elements in a brief for the independent expert report that we urge the ExA to recommend.

3. Relocation of Dedham Vale East CSE Compound in Section D/E to Layham Quarry

3.1 We note that the Applicant has not engaged with the additional arguments advanced by the affected parishes but relies instead on its previous responses.

3.2 We completely reject the assertion from the Applicant that *"its proposed site for the Dedham Vale East CSE compound is the most suitable location taking into account all of the relevant factors"*. We are especially concerned over (i) the ranking of the visual impact of the CSE gantries, switchgear and compound below that of the existing 275kV power line that they replace at the Millfield Woods site, and (ii) the assertion that the planting proposals, essentially hedgerow reinforcement, will ameliorate the impacts over time. The communities that we represent consider these arguments on which the Applicant relies to be especially confounding.

3.3 Our aim throughout has been to demonstrate to the ExA the superiority of the quarry alternative on a wide range of practical and environmental grounds. We place our trust in the ExA agreeing that the additional costs associated with the additional undergrounding are more than offset by the benefits secured, and to recommend to the SoS that the compound be relocated into the quarry.