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Tendring District Council (TDC) Norwich to Tilbury (N2T) – Local Impact Report

Application by National Grid for a Development Consent Order (DCO) for the proposed Norwich to Tilbury project.

Contents

Glossary of Acronyms

AIL – Abnormal Indivisible Load
ALBA - Ardleigh/Little Bromley Area
NL – …National Landscape
(d)DCO – (draft) Development Consent Order
BNG – Biodiversity Net Gain
BMV – Best and Most Versatile (agricultural land) [Grades 1, 2 and 3a under the Agricultural Land Classification system]
CEMP – Construction Environmental Management Plan
CSE - Cable Sealing End
CTM&TP – Construction Traffic Management and Travel Plan
DDR – Design Development Report
ECC – Essex County Council
EIA – Environmental Impact Assessment
ES – Environmental Statement
ExA – Examining Authority
FE – Five Estuaries Windfarm/DCO
GW – Gigawatt
HGV – Heavy Goods Vehicle
HVDC – High Voltage Direct Current
IEMA - Institute of Environmental Management and Assessment
kV – Kilovolt
(o)LEMP – (Outline) Landscape and Ecological Management Plan
LHA – Local Highway Authority

LIR – Local Impact Report
LLFA – Lead Local Flood Authority
MHCLG – Ministry of Housing, Communities and Local Government
NF – North Falls Windfarm/DCO
NGET – National Grid
NGV – National Grid Ventures
NMU – NonMotorised- User
NPPF – National Planning Policy Framework
NSIP – Nationally Significant Infrastructure Project
NPS – National Policy Statement
PI – Planning Inspectorate
PRoW – Public Rights of Way
RSCNVA – Receptor Specific- Construction Noise & Vibration Assessment
RR – Relevant Representation
SANG – Suitable Alternative Natural Greenspace
SoCG – Statement of Common Ground
SoS – Secretary of State
SPA – Special Protection Area
SSSI – Site of Special Scientific Interest
STEM – Science, Technology, Engineering and Maths
SuDS – Sustainable Drainage System
TEC - Transmission Entry Capacity
TI – Tarchon Interconnector
TDLP – Tendring District Local Plan
(o)WSI – (Outline) Written Scheme of Investigation

1. Purpose of this Document

1.1 This document has been prepared by Tendring District Council to provide a Local Impact Report ("LIR") setting out the relevant policy context, an assessment of the anticipated impacts, and the mitigation and/or compensation considered necessary. The assessment is presented by topic specific service areas to assist the Examining Authority ("ExA") an ensure clarity and consistency. References to the Examination Library are included throughout to assist readers in locating supporting evidence.

2. Overview

2.1 Tendring District Council ("TDC") is a statutory consultee for Nationally Significant Infrastructure Projects ("NSIPs"). Officers have undertaken a detailed review of the proposals submitted by National Grid Electricity Transmission ("NGET") and have engaged extensively with local communities, local Ward Members, and neighbouring authorities, including Essex County Council, Suffolk County Council, Norfolk County Council, the District Councils of Braintree and the City Councils of Colchester and Chelmsford, Brentwood Borough Council and Thurrock Council. TDC has also consulted with the Suffolk & Essex Coast & Heaths National Landscape Partnership to ensure that local environmental, social, and landscape considerations are fully understood.

2.2 This LIR has been prepared in accordance with section 60(3) of the Planning Act 2008 (as amended), having regard to the Planning Inspectorate's guidance *Nationally Significant Infrastructure Projects: Advice for Local Authorities* and the Ministry of Housing, Communities and Local Government ("MHCLG") guidance *Planning Act 2008: Examination Stage for Nationally Significant Infrastructure Projects*.

2.3 Relevant officers at TDC have experience of the NSIP regime, and this LIR has been informed by contributions from a wide range of Council officers with relevant technical expertise in their respective service areas.

2.4 It is essential that TDC clearly articulates its concerns to the ExA at this stage, in order to influence necessary changes and improvements to the proposals before the ExA makes its recommendations to the Secretary of State ("SoS").

2.5 TDC recognises that, while the principle of delivering infrastructure to support the decarbonisation of the UK's energy system is strongly supported, the submitted proposals will result in wide ranging and significant impacts on the district of Tendring and contain countless shortcomings that require urgent resolution. TDC's position is that the design of the project, as currently proposed, will cause considerable, overriding and lasting harm to the local and wider environment, local communities and businesses along the route—impacts that fall particularly heavily and disproportionately on the rural communities of northwest Tendring

2.6 In this LIR, TDC will demonstrate that less harmful and more sustainable alternatives have not been adequately assessed, evidenced, or pursued by the Applicant.

2.7 It continues to be TDC's firmly held view that the site selection process for the East Anglia Connection Node ("EACN"), together with the preferred routing of the 400kV underground cables into the EACN and the overhead pylons emerging from it, is fundamentally flawed. There are clear inconsistencies in the Applicant's approach to undergrounding versus overhead pylons, and critical decisions regarding the location of strategic infrastructure—including the EACN—appear to have been predetermined. These decisions by NGET are very consequential and will carry profound and lasting consequences for nature, local communities, heritage assets, and the operation of rural businesses.

2.8 Furthermore, the two offshore wind farm expansion proposals—North Falls (NF) and Five Estuaries (FE)—are wholly dependent on the Norwich to Tilbury (N2T) project. Their advancement ahead of a credible and transparent assessment of N2T route and siting options further undermines the integrity of the optioneering and site selection process for this type of interlinked infrastructure.

2.9 TDC will also highlight in this submission its concerns that the Applicant has not demonstrated a consistent or transparent "openbook" approach in respect of key aspects of site selection methodology. Having regard to all available evidence—including the material submitted by the NF and FE promoters—TDC will continue to argue that the location of the EACN was effectively chosen prior to any robust appraisal of alternative sites, that NGET 'settled' on its chosen location long before any technical reports have been completed and instead allowing NF and FE 'customer convenience' and unevidenced costs decisions to be at the absolute and pivotal forefront in their decision making. Moreover, TDC will demonstrate in this LIR that subsequent documentation has been shaped to justify its decision to locate the EACN in the area between Ardleigh and

Little Bromley, rather than support a genuinely evidence-led assessment, and therefore never affording local communities any alternatives insofar as the positioning of the EACN is concerned.

2.10 Notwithstanding all these very concerning and serious shortcomings, should the project be consented in its current form, it would impose a significant and disproportionate burden on communities across Tendring—particularly the small rural settlements of northwest Tendring—due to the concentration of major substation and associated infrastructure within a single, extensive area. This concentration is a direct consequence of the flawed EACN site selection process.

2.11 Local communities would face prolonged construction activity, including works before 8:00am, after 6:30pm on weekdays, and on Sundays and Bank Holidays, resulting in little to no respite for residents. TDC is also deeply concerned by the lack of meaningful coordination between this project and other major energy related proposals, most notably NF, FE, and the Tarchon Interconnector (TI). This failure contributes to unnecessary cumulative impacts and a fragmented strategic approach to energy infrastructure delivery.

2.12 Individually and collectively, the N2T project and its associated infrastructure would cause significant and lasting harm to the local built and natural environment, to the nationally designated Suffolk & Essex Coast & Heaths National Landscape, to the wellbeing and cohesion of affected communities, and to the district's visitor and rural economy. These impacts must be fully acknowledged, rigorously assessed, and supported by complete technical and cost evidence. Where necessary and relevant, they must also be meaningfully addressed by the Applicant. Only when this has been done—and when all routing and infrastructure-location decisions have been transparently informed by the full evidence base and detailed costings on an open-book basis, and where necessary and relevant, routing and infrastructure location decisions updated and /or changed —can we determine whether an appropriate balance has been struck. That balance must weigh the Applicant's needs against the essential requirement to protect the environment, local communities, and the businesses that rely on them.

2.13 TDC also wish to state that in some instances, the concerns and objections raised within this submission may be capable of resolution through the provision of further detailed information and justification from NGET. However, at present, significant deficiencies in the submitted evidence prevent the Council from reaching a position of confidence in the Applicant's assessments, conclusions or proposed mitigation.

3. Terms of Reference

Introduction

3.1 NGET has submitted a DCO application for a new 400 kV electricity transmission connection running approximately 180 km from Norwich Main Substation to Tilbury Substation, via Bramford Substation, a new EACN substation on the Tendring Peninsula, and a new Tilbury North Substation.

3.2 The project includes:

- 159 km of new overhead line, supported by around 509 steel lattice pylons, generally 40–50 metres in height, with some gantries up to 15 metres.
- 21 km of underground cable, including sections through the Dedham Vale National Landscape (AONB).
- Up to seven Cable Sealing End (CSE) compounds to link underground cables with overhead lines.
- Modifications to the existing Norwich Main Substation and an extension to the Bramford Substation.
- Construction of:
- A new 400 kV AIS EACN Substation on the Tendring Peninsula.
- A new 400 kV GIS Tilbury North Substation south of Orsett Golf Course.
- Additional modifications to existing National Grid overhead lines to connect into Tilbury North Substation.
- Associated ancillary and temporary construction works.

3.3 This LIR evaluates the local impacts of these proposals.

Scope

3.4 This LIR considers the impacts of the proposed scheme as they affect the administrative area of TDC.

3.5 This report focuses specifically on the impacts arising from works in the wider north-western part of the Tendring district, as described in the relevant sections of Chapter 4 of the Environmental Statement ("ES"), including:

- A new 400 kV Air Insulated Switchgear (AIS) East Anglia Connection Node (EACN) Substation on the Tendring Peninsula.
- New 400 kV underground cables and new overhead lines entering the TDC administrative area and connecting into and out of the EACN.
- New permanent and temporary haul routes serving the EACN and associated construction compounds.
- All construction activities and temporary works associated with the above, where these affect the TDC area and its immediate hinterland to the north, west, and south.

3.6 This LIR does not repeat the Applicant's description of the Works, relying instead on the detailed descriptions contained within the DCO application documents.

3.7 The Council has experience of the DCO process for major infrastructure projects, including the NF and FE offshore wind farms. TDC actively participated in the examinations for both schemes—FE, which has been consented by the SoS at the time of writing, and NF, which is expected to receive a decision in early 2026. TDC is therefore well-versed in the responsibilities placed upon promoters under the Planning Act 2008 regime.

3.8 Within the TDC area, the Order Limits predominantly encompass BMV agricultural land, alongside other greenfield sites, watercourses, and sections of the public highway. As demonstrated in the 'Agriculture and Soils section below, the north-western part of Tendring district contains the district's only concentration of BMV land, making it a

uniquely important area for food production, food security, and agricultural employment. It is precisely this critical area that is being targeted by NGET's proposals.

3.9 TDC also continues to engage with the Applicant through the preparation of the draft Statement of Common Ground ("SoCG"), with the objective of narrowing outstanding areas of disagreement wherever possible.

Structure of the LIR

3.10 The LIR provides a statutory mechanism to ensure the ExA is fully informed of the environmental, social, and economic impacts that the N2T project may have on the communities, landscapes, and infrastructure within the District.

3.11 The report sets out the likely impacts of the proposal under topic-based headings (such as Agriculture and Soils, Air Quality, Cumulative Effects etc). For each topic, TDC identifies the key issues and provides commentary on the extent to which the Applicant has addressed these matters—or the extent to which they remain unresolved—and the resulting implications for people, businesses, the environment, and wildlife. This approach is in line with the advice issued by the Planning Inspectorate on effective ways to engage in the NSIP process and aligned with the request by the ExA during the first open floor hearing which is to sharply focus on how this NSIP will affect a local area. The assessments in this LIR are also undertaken with reference to relevant policies and the submitted application documents.

3.12 Where possible, TDC will also identify potential solutions or actions that we consider necessary to address deficiencies or policy conflicts. However, given the seriousness of some impacts, TDC considers that certain shortcomings and conflicts may not be capable of being overcome.

3.13 It is important to emphasise that the primary purpose of the LIR is to identify the likely impacts of the development and to highlight where mitigation, refinement, or additional safeguards are not sufficient and or where additional mitigation, refinement or safeguards are required.

3.14 Where TDC considers that certain issues have not been adequately addressed, the unresolved impacts form the basis of the Council's current objections to the proposals. As these issues are set out within this LIR, they will not be duplicated in separate written representations.

3.15 TDC will continue to encourage the Applicant to resolve the outstanding matters and respectfully invites the ExA to support this. Where the Applicant has sought to address particular issues, the relevant parts of the application—such as DCO articles, requirements, or obligations—will be referenced within the LIR.

4. Description of the Area of the Proposed Development

4.1 The project description is comprehensively set out in Chapter 4 of the submitted ES and does not require repetition here. However, the ExA is strongly encouraged to familiarise itself with **Section C** (as defined in Chapter 4 of the ES), which contains all works proposed within the TDC area. **Section C (or better understood to be all works in the district of Tendring) represents one of the most severely and disproportionately**

affected parts of the entire project, and a thorough understanding of its scope is essential.

5. Policy Context

National and Local policy

Powering Up Britian

5.1 The Powering Up Britain document sets out how the Government will enhance our country's energy security, seize the economic opportunities of the transition, and deliver on our net zero commitment

A Green Future: Our 25 Year Plan to Improve the Environment

5.2 The "A Green Future: Our 25 Year Plan to Improve the Environment" document is the Government's high level environmental strategy which includes targets in a number of relevant areas

National Policy Statements

5.3 NPS (EN-1) is the overarching national policy statement for energy and was updated in 2025. This updated "2025 revised version" is the one that now applies to the Examination of NSIPs. EN-1 sets out the UK Government's commitment to increasing renewable generation capacity and recognises that in the short to medium term, much of the new capacity is likely to come from onshore and offhore wind.

5.4 NPS (EN-3) is the UK Government's strategy for renewable energy infrastructure.

5.5 NPS (EN-5) is the UK Government's strategy for electricity networks infrastructure. This policy statement applies to not only transmission systems but also associated infrastructure such as substations and converter stations. This policy statement sets out the general principles that should be applied in the assessment of development consent application across the range of energy technologies

National Planning Policy Framework

5.6 The National Planning Policy Framework ("NPPF") was last updated in December 2024 and provides national policy in respect of proposals under the Town & Country Planning Act 1990. It is however also a material consideration when considering NSIP proposals

Horlock Rules

5.7 The Horlock Rules (see Appendix 20) are National Grid's guidelines for the siting and design of substations

Tendring District Local Plan

5.8 The most up-to-date, adopted version of this document is the *Tendring District Local Plan 2013–2033 and Beyond* –adopted in January 2021. The full text of the relevant Development Plan policies is available in Appendices 1-19. This Local Impact Report therefore considers the policies set out in the adopted Local Plan.

Essex County Council

5.9 ECC will be submitting its own Local Impact Report. All ECC policies and documents referenced within that report, but not cited in TDC's LIR, remain fully relevant and should be considered accordingly. Moreover, this LIR should be read alongside and in conjunction with the ECC LIR

Neighbourhood Plans

5.10 This Local Impact Report considers the relevant policies set out in the following Neighbourhood Plans:

1. Ardleigh Neighbourhood Plan 2020 – 2033, adopted in September 2024.
2. Elmstead Neighbourhood Plan 2013 – 2033, adopted in October 2024.

Emerging Policy

TDC's Emerging Local Plan to 2024

5.11 From 26 January 2026, the Council's current Local Plan—including its housing requirement of 550 homes per year—will reach its five-year anniversary. At that point, the existing housing target will automatically be replaced by a new requirement of over 1,000 homes per year, calculated using the Government's standard method. This results in a need to plan for almost double the current annual growth rate over a 17-year period to 31 March 2042, equating to a total requirement of over 18,071 homes between 2025 and 2042.

5.12 Through the Local Plan review, the Council must therefore identify a significant number of new locations and sites capable of accommodating the residual requirement of approximately 7,400 additional homes (over the new plan period) – this is above and beyond those sites already allocated in the adopted Local Plan or which have already been granted planning permission. For Tendring, this represents a scale of growth that is exceptionally challenging and will place considerable pressure on already strained infrastructure, particularly the local highway network.

5.13 TDC intends to submit its new Local Plan to the PINS for Examination by the end of 2026, and a Regulation 18 public consultation is currently under way (as of February 2026). The policies within the emerging Local Plan should therefore be afforded appropriate weight, reflecting the progress expected throughout 2026 and into 2027—coinciding with the anticipated determination of the N2T DCO by the Secretary of State.

6. TDC's in Principle Position

6.1 TDC acknowledge that enhanced transmission infrastructure will play a central role in tackling climate change and in meeting Government targets in the lead up to net-zero by 2050. As part of the Great Grid Upgrade therefore, N2T is recognised as a proposal that would contribute to the decarbonisation of the UK's energy supply, in accordance with the Clean Power 2030 Action Plan, helping to deliver the Government targets of net zero.

6.2 TDC, like ECC, also accepts that network reinforcement is necessary to accommodate the expected growth in demand for electricity taking account of the additional contracted / planned electricity generation in the East Anglia region, and that timing for the project is driven by the need for capacity in the transmission system taking account of the requirements of the National Electricity Transmission System Security and Quality of Supply Standard (SQSS).

6.3 TDC is supportive of the national transition towards a low or zero carbon economy but considers the shift towards the delivery of low carbon energy will only be successfully achieved if developments such as N2T can be appropriately located taking into account, and suitably mitigating the very real impacts they have on the natural environment, landscapes, food production, and local communities and businesses within which they are situated. However, such national benefit should not be secured at the overriding expense of TDCs communities, its food producers, landscapes and environments that would be so severely and disproportionately affected by the development.

6.4 From the outset of its engagement on this project, and throughout all stages of consultation, TDC has maintained an in-principle position that the preferred strategic option for meeting the need for additional transmission capacity is the delivery of an integrated offshore solution. Such an approach would minimise the extent of onshore transmission infrastructure and avoid the use of overhead lines (OHLs) and pylons along the length of the route. TDC remains firmly of the view that a more sensitively designed scheme—one that places far greater emphasis on avoiding harm—could secure a significantly better outcome for the district of Tendring and indeed Essex, safeguarding the amenity of Tendring communities, its businesses and protecting the environment.

6.5 For the reasons set out elsewhere in this LIR, and as consistently expressed in previous submissions to the ExA, including TDC's Relevant Representation (RR), TDC questions NGET's cost-benefit analysis which forms the primary justification for discounting an integrated offshore alternative. Furthermore, TDC has serious concerns regarding NGET's reasoning for other key decisions, including the selection of its preferred location for the EACN. TDC maintains that the Applicant's arguments relating to cost, feasibility, and potential "inconvenience" to NF and FE customers are not adequately evidenced and do not withstand detailed scrutiny.

6.6 TDC's concern, informing its preferred option and reflected in the comments of many affected communities, is founded on the significant impact a scheme based on the transmission of energy via overhead power cables, will have on affected communities, the environment and the economy of north Essex in general, and Tendring in particular. The proposed technical solution involving overhead powerlines supported on pylons would result in the introduction of a significant number of incongruous and intrusive features of industrial character into a predominantly open rural landscape in and around Ardleigh and Little Bromley; the effects of which would be permanent, and due to the height and scale of the structures involved, cannot be successfully mitigated.

6.7 As alluded to elsewhere, TDC also notes that an offshore High Voltage Direct Current (HVDC) cable solution would be more expensive than the preferred onshore solution with OHLs, although it would be less expensive than an onshore solution with underground High Voltage Alternate Current (HVAC) cables, as set out by 6.3 Environmental Statement Chapter 3 – Alternatives (APP-127). Where proposed, the areas of undergrounding are

supported due to the reduction of visual impact on sensitive landscapes, but TDC is conscious of the concerns regarding the visual impact of the remaining sections of OHLs. A more extensive combination of onshore and offshore technologies to mitigate the clear harm could therefore have been considered, beyond the areas of underground cabling currently proposed, to address the real and significant impacts the OHLs have on the natural environment, landscapes and local communities within which they are situated.

6.8 Supporting this concern, and as advanced in detail the TDC's RR, it is contended that there has been too great a reliance by NGET on NF and FE 'customer convenience' and the contracted energy generation position to identify the maximum requirement for additional transmission capacity in East Anglia. The Hiorns Report (as submitted to the ExA with the Norfolk County Council Relevant Representation (RR-2753)) identified that it is extremely unlikely that all of the contracted energy generation projects would come forward and/or connect at the volumes stated or dates contracted. It identified a need for sensitivity analysis to assess the likelihood of all contracted projects proceeding (either at all, or by the dates assumed). The report concluded that there was more time available to consider further analysis of potential options, including a potential offshore HVDC link, without prejudicing the development of offshore projects in the East Anglian region. It could not be concluded that the NGET proposal was the best option.

6.9 In response and as briefly alluded to by NGET representatives at the Issues Specific Hearing (covering Needs and Alternatives (on 13/02/2026)), NGET suggested it could not delay its reinforcement of the transmission network beyond 2030 without being in breach of its contractual and licence obligations. TDC has accepted the relevance of those contractual and licence obligations. In so doing, the TDC response, like many other County and District level positions also concluded that given the major consequential nature of NGET's preferred option, a further review of the contracted electricity generation was needed as part of the DCO submission.

6.10 TDC does not believe that NGET has provided any new evidence or sensitivity testing to refute the conclusion of the Hiorns report that the Norwich to Tilbury project is not needed by 2030. While TDC has had regard to the Transmission Entry Capacity (TEC) Register in the submitted DCO, TDC considers it essential that in determining what future expansion is needed, more transparency is provided about the status of the contracted connections and the likelihood of those projects being ready to connect to the transmission network by 2030. The Applicant must not restrict the justification for future network expansion solely to the ESO contracted position.

6.11 This clarification of the contractual position to inform the need and timescale for the planned N2T Project is still required. Until this is evidenced, TDC maintains its position that credible alternatives such as an offshore-centred approach or HVDC undergrounding, delivered at pace, to minimise onshore infrastructure in Essex should continue to be fully explored to minimise the visual instruction and environmental impact.

6.12 In summary, the current application proposes OHLs supported on 50m high lattice pylons, with targeted HVAC undergrounding primarily in the Dedham Vale National Landscape within Essex results in harmful consequences as set out elsewhere. More harmful OHL and pylons are proposed very close to, and around Ardleigh/west of Little Bromley and just south of Dedham Vale National Landscape, including the positioning of

the EACN just east of Ardleigh and west of Little Bromley, with very harmful impacts on both the National Landscape and its setting, and the aforementioned settlements. Accordingly, the scheme as put forward would have very significant and wide-ranging impacts as set out in remaining sections of this LIR. If indeed the timing for the network reinforcement is less acute, as suggested in the Hiorns Report, alternative schemes to the current lattice pylons scheme should be explored in more detail (such as offshore connections and HVDC undergrounding) to ascertain whether they would achieve better environmental outcomes overall, than the current submitted scheme, at acceptable costs, and if so put them forward at pace to achieve the required network reinforcement instead of the submitted scheme.

6.13 Despite these in principle concerns, TDC considers the shift towards the delivery of low carbon energy will only be successfully achieved if developments such as N2T take into account and mitigate the very real impacts they have on the natural environment, landscapes and local communities within which they are situated. If the proposal is to receive favourable consideration it is important that appropriate levels of mitigation and legacy benefits are secured. In particular, alongside community benefits for local residents and communities, TDC strongly believes the N2T project should deliver significant socio-economic benefits to Tendring District as one of the most severely and disproportionately affected areas, which is also one of the most deprived districts in the whole of the United Kingdom. TDC is concerned that this issue, like so many other issues - and especially the associated social value opportunities around skills, training, and future employment - have not been fully addressed. NGET needs to address these and indeed other significant shortcomings as a matter of priority.

7. EACN Location, Project Corridor Locations (underground cables and pylons corridor) & Site Selection Issues in Tendring and responses to arguments by National Grid as set out

7.1 Since submission of TDC's Relevant Representation (RR) on 27 November 2025, no substantive response has been provided by NGET to address the specific issues raised in section 4.2 (of TDC's RR) concerning the pre-determined nature around the selection of the location of the EACN at Ardleigh/Little Bromley, the selection of underground cable corridors, and the pylon alignment north of Ardleigh. These omissions persist notwithstanding the clear and detailed issues that TDC set out in its RR, including the evidence of a material departure from the Horlock Rules on linearity, the concentration of infrastructure on the only concentration of Best and Most Versatile (BMV) land in the district of Tendring (see relevant sections below), and, what TDC consider to be the avoidable arc-shaped alignment around Ardleigh

7.2 ECC's Relevant Representation also sets out in-principle objection to the strategy of extensive new overhead lines and the insufficient consideration of less damaging strategic options. ECC's position is also that the current approach imposes significant impacts across Essex, and in particular the northwestern parts of the Tendring Peninsula,

and that NGET failed to resolve major issues pre-examination. This County-level position supports TDC's concerns that the site selection and routing logic in Tendring is not the least-harmful or most coherent planning outcome, and TDC is therefore requesting that the ExA carefully consider these arguments.

7.3 TDC's Relevant Representation demonstrated that sites located closer to the existing Strategic Road Network (SRN) infrastructure, particularly those directly adjacent to the A12 further west—including a site that NGET itself previously considered but discounted—offer several advantages. Such other options include locations with higher existing background noise levels, alignment with the prevailing N2T route and direct SRN access, which would:

- reduce the length of required overhead lines by approximately 10 km,
- remove the need for a CSE compound by simplifying the interface with the prevailing north-east/south-west project corridor, and
- compliance with the Horlock Principles (see paragraph below), particularly those promoting linearity and the co-location of energy infrastructure alongside major transport corridors.

7.4 Despite these clear advantages, NGET has not provided TDC with like-for-like comparative information—such as equivalent drawings, constraints maps, quantified impact matrices, or detailed cost assessments—that would allow a robust comparison between any alternatives closer to existing suitable SRN infrastructure and the chosen Ardleigh/Little Bromley location. As a result, the claimed disadvantages of sites closer to such pivotal infrastructure remain unverified.

7.5 In terms of the application of the Horlock Rules and Good Design, TDC's analysis shows a pronounced arc and jarring deviation in the pylon route north and north west of Ardleigh (TB3–TB21), with repeated angular deviations and close proximity to the established and historic settlements or Ardleigh and Little Bromley, which is the complete opposite of the "as linear as possible" Horlock preference and significantly increases the need for visually intrusive angle towers. NGET has not rebutted this analysis with engineering evidence that the arc cannot be avoided if the EACN were sited more coherently on the prevailing route closer to existing road noise sources or areas with established high background noise levels and direct access of the SRN.

7.6 The Applicant's own DDR confirms that substantial design choices and challenges, and customer co-ordination considerations shaped the siting and routing – for the most part these assertions remain unevidenced. The DDR also does not address the principal criticism that EACN site selection have been predetermined, with evidence then retrofitted to suite NGETs preferred route and locations, and to defend the pre-determined outcome rather than comparing alternatives on a neutral basis

7.7 In terms of avoidance of BMV agricultural land and concentration of harm – these two elements are covered in more detail in the relevant sections below, however they are closely interlinked with the EACN and Project Corridor consideration and therefore require attention here. The Ardleigh/Little Bromley cluster places the EACN and associated corridors squarely in the heart of Grade 1 and 2 (BMV) land, with inherent long-term productivity and food-security impacts. This concentration is contrary to national policy preferences to avoid higher-grade agricultural soils where reasonable

alternatives exist, and with the Horlock approach of minimising new land-take and linear infrastructure in sensitive rural landscapes. NGET has not offered a robust justification for choosing a BMV-intensive location over a brownfield/transport-corridor-adjacent site other than admitting that it 'settled' on its chosen location in the main for 'customer convenience' and 'costs reasons' (of which 'engineering complexities' feeds into).

7.8 Regarding NGET's assertions about cable-corridor requirements and capacity constraints, the Applicant cites the need to accommodate "multiple customer corridors" (NF, FE and TI—even though TI has not yet undertaken either statutory or non-statutory consultation) as a justification for rejecting alternatives located further west and closer to the A12 and other strategic road infrastructure.

7.9 Even if NGET could demonstrate that accommodating multiple customer corridors (further westwards) is genuinely overriding—and to date no evidence has been provided to show that such arrangements are technically unachievable—TDC's Relevant Representation makes clear that this issue should, at most, be a neutral factor in the planning balance. This is because multiple cable corridors will be required irrespective of where the EACN is located—whether between Ardleigh and Little Bromley, further west near the A12, or even significantly closer to London.

7.10 In reality, the current proposal demands extensive new corridors and, more significantly, introduces a highly intrusive, disproportionate and in TDC's view a completely unnecessary large arc around Ardleigh. NGET has supplied no conclusive diagrammatic evidence, no verifiable costings, and no like-for-like technical assessments that would withstand public scrutiny to substantiate the claim that more suitable sites nearer the project corridor would be less deliverable, less cost-effective, or would require a greater aggregate number of corridors than the current design.

7.11 With regard to flexibility for future customers, NGET's assertion that sites located closer to the prevailing project corridor—and adjacent to existing noise sources such as the Strategic Road Network—would provide "less flexibility" for future connections is unsupported by robust evidence that could be tested at examination. More concerningly, this argument by NGET clearly implies an expectation of even *more* infrastructure expansion within the highly sensitive and BMV Ardleigh/Little Bromley Area ('ALBA') zone, which is some 7km east of the prevailing N2T project corridor. Such an approach effectively locks the ALBA into a state of ongoing structural disadvantage, generating a damaging "no-end-in-sight" dynamic that heightens long-term risks to agricultural land, food production, and the resilience of local food security. This is both very concerning and fundamentally at odds with the principle that the burden of nationally significant infrastructure should be distributed, not repeatedly concentrated, and with national policy requirements to avoid cumulative impacts on BMV land and rural communities.

7.12 To illustrate this concern, the aerial image below highlights a large area north of the Blyth River in Northumberland, where a similar cluster of electricity substations, interconnectors, a very large data centre and associated infrastructure has steadily accumulated over time. The annotated image shows the existing installations as well as those currently under construction. It demonstrates the scale of transformation that can result from critical initial siting decisions and underscores the utmost seriousness, and consequential nature of NGET's decision to locate the EACN in the heart of productive BMV agricultural land. It also reinforces the likelihood—acknowledged by NGET

themselves—that this sensitive landscape will most likely face further infrastructure intensification if the EACN is placed here. By providing this example, TDC is not suggesting that the below location just north of the Blyth River in Northumberland is an unsuitable location for such infrastructure. Rather, the TDC is illustrating the potentially far-reaching and consequential implications of NGET's decision to situate comparable infrastructure at the heart of BMV agricultural land and within the setting of a National Landscape, and what this decision could signal for future subsequent (infrastructure) siting practices. Indeed, the Blyth River location appears substantially more appropriate for such development, given its close proximity to Strategic Road Network (SRN) infrastructure and the Brock Lane / A189 intersection lying only around 1 km west of the interconnector and National Grid substation. This stands in stark contrast to the highly rural, agricultural heartland that NGET has selected for the N2T EACN—an area lacking comparable strategic transport corridors and therefore far more sensitive to adverse impacts.

Recent (2025) image of the area north of the River Blyth in Northumberland its is energy infrastructure

7.13 Ultimately, no planning evidence has been provided by NGET to justify why 'customer flexibility' and costs should be so overriding and as a consequence mean the continued concentration in the ALBA rather than strategic dispersal or offshore solutions.

7.14 In terms of National Landscape impact and NGET's "one more corridor" argument, TDC accepts there may be a marginal increase in underground corridor length within the Dedham Vale National Landscape if an A12-side EACN site were selected; however, NGET has not provided a comparison of total quantitative and cumulative harm (visual, agricultural, arboricultural, construction traffic, and residential amenity) that demonstrates why one additional underground section outweighs the large, permanent arc of 50 m+ pylons and the EACN's intrusion into BMV land. Without that balancing exercise, TDC maintains the position that the current conclusion is not evidence-led.

7.15 In terms of transport access and constructability—both are covered in further detail below however these considerations remain fundamentally interlinked with the siting of the EACN and the alignment of the project corridor – and therefore require specific attention here. TDC maintains that significantly better outcomes are achievable. For example, locating the EACN further west, immediately adjacent to a strategic road such as the A12, and right on the prevailing project corridor, would greatly reduce reliance on new rural haul roads and the widening of narrow lanes through Ardleigh and Little Bromley. It would also avoid the need to route large volumes of HGVs along unsuitable rural lanes and poorly maintained A- and B-class roads.

7.16 By contrast, NGET's chosen location is over 1 km from the nearest A-route—the A137 east of Ardleigh—which, in this section, is notably winding and wholly unsuitable and frankly dangerous for the scale of cumulative HGV and construction-related traffic expected. As a direct consequence of selecting the Ardleigh/Little Bromley area, NGET has compelled themselves to construct a new multi-mile haul route and to reconfigure Bentley Road (a country lane) so that it effectively functions as an additional, and primary access haul road (which will also be the busiest and noisiest primary access route (PAR) of the entire project). These haul routes are required to facilitate primary access to the construction sites, compounds and other major activities from the A120. The A120 is located approximately 4.4km to the south-east (measured as a linear distance from the proposed EACN site). A western location adjacent to the A12 would also significantly shorten the overhead line alignment (by approximate 10km) required to re-join the prevailing route.

7.17 In terms of cumulative effects and coordinated delivery, TDC's RR already evidences that multiple NSIPs (N2T, NF, FE and potentially TI) will converge in north-west Tendring. The Examination Library shows the ExA have flagged cumulative issues and coordination (in delivery) in its procedural correspondence, yet despite the assurances we have heard early on in the ISH from NGET, the reality is there remains no binding, multi-promoter comprehensive coordination framework (corridor sharing, co-ordinated EACN connection locations, simultaneous works, unified logistics) that would avoid repeated soil disturbance and serious disruption for local communities and business. ECC's RR reinforces the need for effective coordination, noting missed opportunities to front-load and resolve these matters. The cumulative case for moving the EACN away from the BMV core and closer to strategic road infrastructure remains compelling and unrebutted

7.18 In conclusion, given the persisting evidential gaps, TDC respectfully invites the ExA to require before any preference is formed for the ALBA EACN and current corridor design:

1. A comparative, like-for-like siting evidence

Side-by-side plans, sections and constraints mapping for the Ardleigh/Little Bromley EACN and a western/A12-side EACN (e.g., RAF Boxted envelope), including: linearity metrics, pylon angle count and types, overhead length deltas, underground corridor lengths, crossings, heritage/ecology constraints, arboriculture impacts, and comparable BMV hectares permanently/temporarily lost.

2. Quantified construction logistics

HGV routing, haul road requirements, lane widenings, junction works and total construction kilometres in rural lanes versus A12-side access, with net community impact indices (noise, air quality, severance etc.)

3. Cumulative delivery plan across NSIPs

Given that all these projects are interdependent, TDC is asking for a binding multi-promoter Construction and Environmental Management Plan framework covering shared corridors, single-pass soil handling, and synchronised works, to avoid double-digging and repeated disruption. (ECC has referred to the lack of pre-application resolution—TDC seeks enforceable, examination-stage remedies).

4. Policy compliance statement (Horlock and BMV)

A clear demonstration explaining how the chosen site minimises changes in direction, co-locates with existing corridors where practicable, and avoids BMV where reasonable alternatives exist—accurately and transparently benchmarked against the A12-side option.

7.19 Without this and on the evidence before the Examination:

- TDC would argue that it is not possible to reach a decision on whether the Ardleigh/Little Bromley EACN location, the arc-shaped pylon alignment, and the current corridor choices in Tendring represent the least-harm, most linear, or most sustainable configuration that could reasonably be achieved.
- It remains TDC's case that NGET has not provided the comparative, quantified material that would justify rejecting an A12-proximate (western) (or equivalent) EACN location and a straighter reconnection to the main corridor—despite the material benefits (shorter overheads, fewer angle towers, reduced rural logistics, less BMV take) that TDC has set out.
- Until a robust, like-for-like comparative assessment is finally provided—something TDC has been requesting for over two years—and until such an assessment is capable of withstanding full public and technical scrutiny, TDC respectfully invites the ExA to conclude that the Applicant's site-selection process and corridor design in Tendring remain insufficiently justified. In the absence of this essential comparative evidence, a site directly adjacent to the Strategic Road Network must remain actively in consideration as a more coherent, more policy-compliant, and more community-protective alternative.

8. Agriculture and Soils

8.1 TDC is concerned about the significant disruption to agricultural land and soil quality within the affected communities, particularly around Ardleigh, Little Bromley, and Lawford. The proposed haul routes and construction compounds will fragment productive farmland, impacting local food production and rural livelihoods.

Policy Context

National policy

A Green Future: Our 25 Year Plan to Improve the Environment

8.2 One of the goals and targets highlighted in this document is to use resources from nature more sustainably and efficiently, where it states, 'Improving our approach to soil management: by 2030 we want all of England's soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches.'

Local policy

Tendring District Local Plan

Strategic Policy PPL3 - The Rural Landscape:

8.3 In relation to agriculture and soils, this policy requires the refusal of development if it causes material harm to the rural landscape, stating 'The Council will protect the rural landscape and refuse planning permission for any proposed development which would cause material harm to its character or appearance…'.

Neighbourhood Plans

Ardleigh Neighbourhood Plan 2020 - 2033

Policy EP – Natural, Built & Historic Environment (para 1(f)):

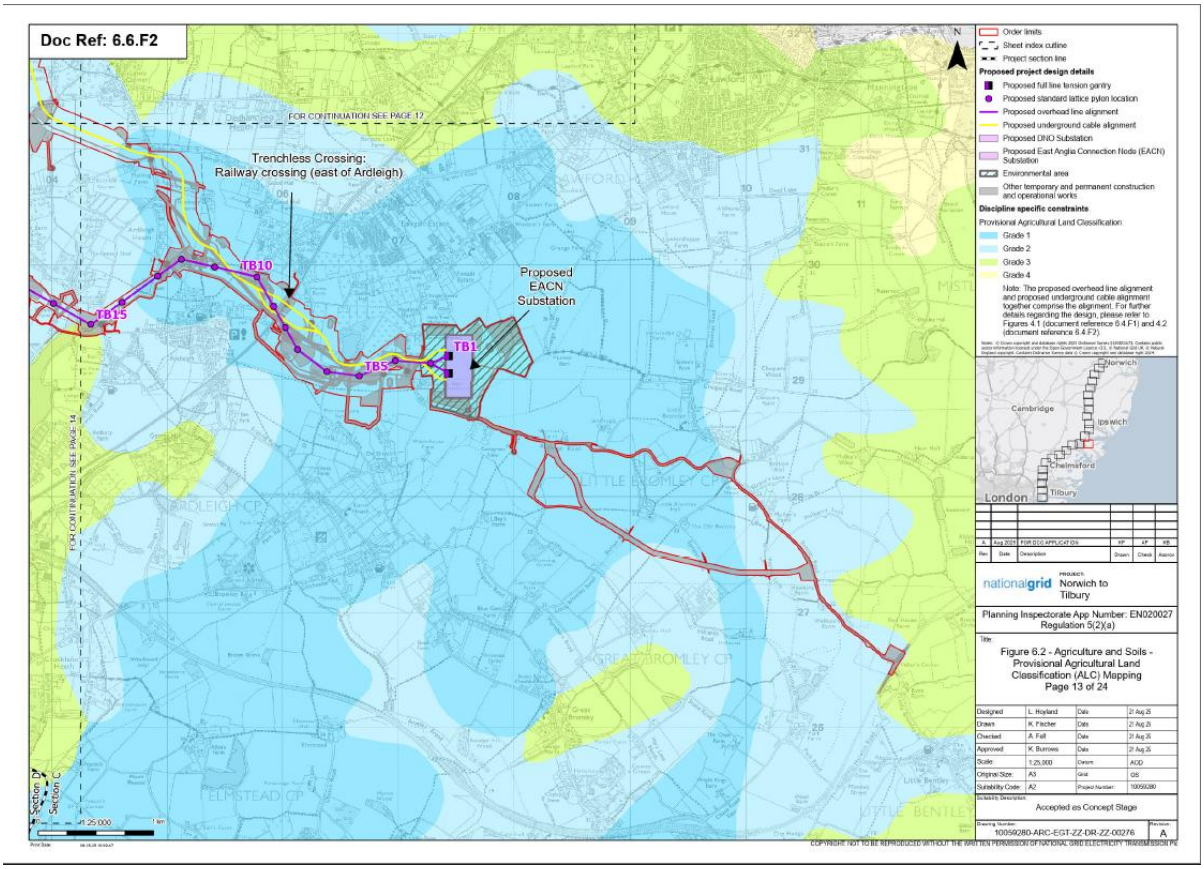
8.4 This policy protects best and most versatile (BMV) agricultural land and sets out a requirement for developers to assess agricultural land quality, stating 'There is no unnecessary loss of best and most versatile agricultural land to non compatible uses (the onus will be on the developer to establish the quality of any agricultural land proposed for other uses)'

Elmstead Neighbourhood Plan 2013 – 2033

Policy ELM1: Settlement Development Boundaries:

8.5 This policy determines where development can and cannot occur, which offers protection for agricultural land, soils and the wider countryside, stating 'Proposals for development outside the settlement boundaries will only be supported if they accord with development plan policies managing development in the countryside…'

The location of high-quality (BMV) land in Tendring



8.6 The map above shows the Agricultural Land Classification (ALC) in relation to the proposed NSIP within the Tendring area. The proposed infrastructure would be developed mainly on ALC Grades 1 and 2 land. The definitions for these grades, taken from Agricultural Land Classification of England and Wales: Guidelines for Grading the Quality of Agricultural Land, are as follows:

Grade 1 – Excellent quality agricultural land

8.7 *"Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown, commonly including top fruit, soft fruit, salad crops and winter-harvested vegetables. Yields are high and less variable than on land of lower quality."*

Grade 2 – Very good quality agricultural land

8.8 *"Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown, but on some land within this grade there may be reduced flexibility due to difficulties in producing more demanding crops such as winter-harvested vegetables and arable root crops. Yields are generally high but may be lower or more variable than on Grade 1 land."*

8.9 Based on these maps the NSIP proposed would significantly impact some of the highest quality agricultural land not only Tendring District but in all of the UK.

Soils

8.10 The majority of the order limit located in Tendring District (which is, as set out elsewhere, some 7km to the east of the prevailing project corridor) consists of freely draining, slightly acidic loamy soils and slightly acidic loamy and clayey soils with impeded drainage and moderate fertility. These soil types commonly support high levels of arable agriculture, consist of good versatility for crop types and depending on the soil association present, some localised constraints from seasonal waterlogging.

8.11 The following table (taken from the ES) displays the soil association recorded with the District:

Soil Association	Description/ Relevance
Beccles 3	Slowly permeable, seasonally wet fine loamy over clayey soils. Slight seasonal waterlogging.
Fladbury 1 & 3	Clayey and silty soils often affected by groundwater. High flood risk in places.
Hornbeam 3	Deep fine loamy over clayey soils with seasonal waterlogging.
Ludford	Well-drained fine/coarse loamy soils over gravel. Slight erosion risk.
Midelney	Clayey soils over peat in parts; groundwater-affected; locally flood-prone.

Tendring Association	Deep coarse loamy soils, some seasonally waterlogged coarse/fine loamy over clayey soils. Patterned ground locally.
Windsor	Slowly permeable, seasonally wet clayey soils.
Wix	Deep permeable coarse loamy soils with some wetness; patterned ground.
Windsor / Wix mix areas	Indicator of highly variable drainage characteristics.

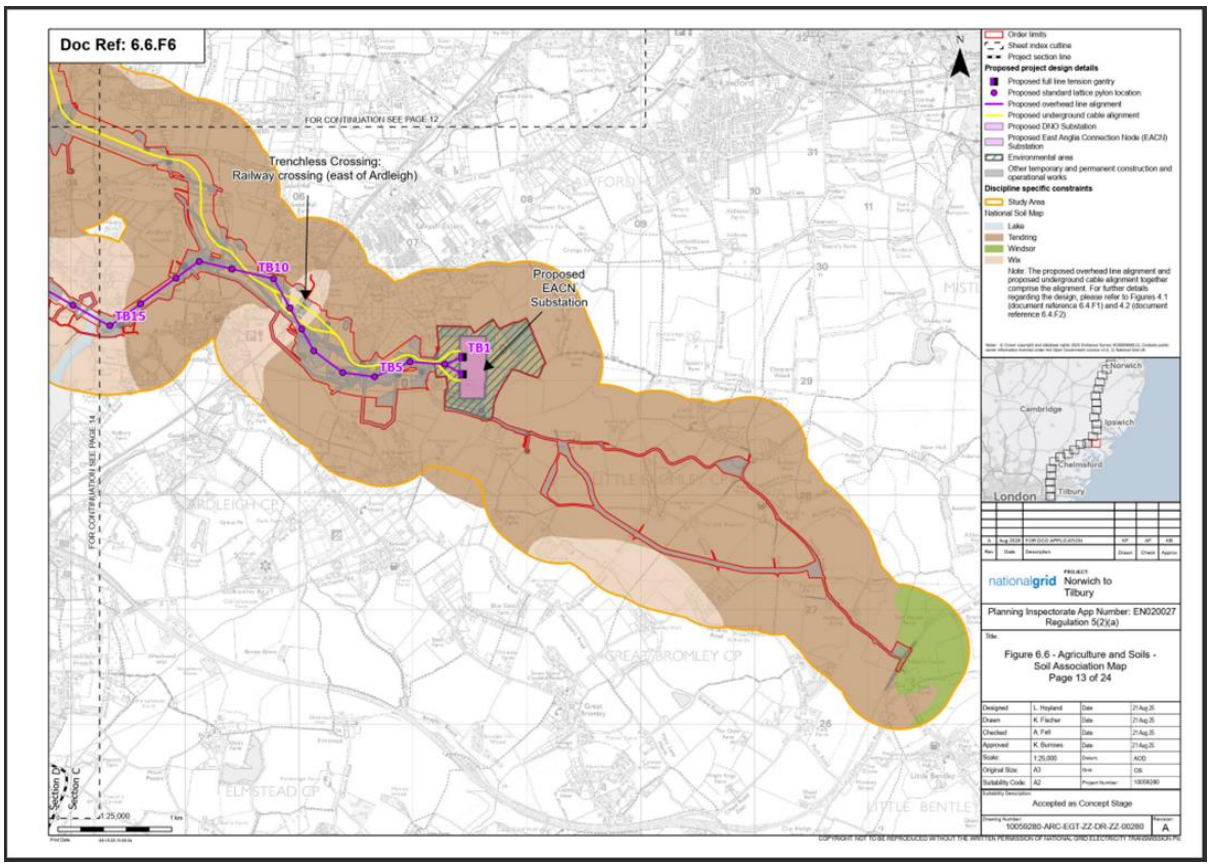
Soil Types and Sensitivities

Soil associations

8.12 The map below shows the soil associations present in the north-western part of the District, focusing on the areas most severely affected by the N2T project. It clearly highlights that the Tendring (dark brown) and Wix (light brown) soil associations are the predominant soil types in this area.

8.13 Both the Tendring and Wix soil types are excellent for growing crops because their deep, loamy structure holds moisture well while still draining enough to prevent waterlogging, giving roots plenty of room to grow. Their mix of sand, silt, and some clay provides a balance of nutrients and air, helping crops stay healthy even in varied weather. This good quality soil type found here is also reflected in the BMV agricultural land rating.

Map indicating Soil Associations (Tendring soil association indicated via the dark brown colour and Wix soil association indicated via the light brown colour)



Assessment of Impacts

8.14 The N2T project would impose significant and long-lasting harm on the agricultural sector within Tendring District, particularly in and around Ardleigh, Little Bromley, Lawford, and the wider rural landscape. This part of the district contains some of the highest-quality, most versatile, and most productive agricultural land in the entire UK, forming a critical and historic component of Tendring's rural economy, food-production capacity, and farming employment.

8.15 The proposed overhead line alignment, the location of the EACN right in the heart of this BMV agricultural area, and the extensive network of haul roads, compounds, and corridor works would together result in:

- direct agricultural land loss,
- soil degradation,
- fragmentation of farm units,
- operational disruption, and
- long-term reductions in agricultural productivity.

8.16 The impacts would be felt not only during construction but also through permanent and irreversible change to land capability and farm business viability.

8.17 TDC's position is clear: these impacts are avoidable, because reasonable and technically viable alternative locations and route strategies exist which would reduce or eliminate harm to BMV land. For this reason, mitigation—however carefully designed—cannot resolve the fundamental conflict created by placing major new transmission infrastructure in the district's only concentration of BMV land – resulting in its permanent loss and potentially more losses in the future (see section 7 above and section 10 below).

8.18 Tendring contains limited areas of Grade 1 and Grade 2 agricultural land, almost all of which lie in the farmland between Ardleigh, Little Bromley, Manningtree, and the A120 corridor. Agricultural Land Classification maps confirm that the proposed N2T infrastructure would be sited directly within these scarce and strategically important soils.

8.19 These land grades represent the top 20% of all agricultural land nationally. In Tendring, they represent the district's primary food-production resource, essential for economic activity, farm diversification, and long-term local food security.

8.20 The N2T proposals would directly affect the best, rarest, and most economically productive farmland in the district and the UK as a whole.

8.21 As briefly alluded to above the soils along the N2T route through Tendring include freely draining loamy soils, seasonally wet loamy-over-clay soils, and deep coarse loamy soils. These soil associations support:

- high-value arable cropping,
- horticultural production,
- flexible crop rotations, and
- long-term soil health reliant on stable structure and undisturbed profiles.

8.22 Even with best-practice management, soil structural damage can persist for decades, reducing yields, limiting crop choice, and requiring costly long-term remediation.

8.23 The N2T scheme will also result in:

- Fragmentation of farm units by haul roads, compounds, and permanent access tracks. As covered in section 7 above, there is no guarantee that that the fragmentation of farm units will stop after the N2T, FE and NF projects have been constructed.
- There will also be disruption of cropping patterns due to severance and loss of whole field parcels.
- Permanent sterilisation of land around pylons and within working widths.
- Drainage alteration, risking increased waterlogging or drought stress.
- Operational inefficiencies, increasing costs/losses for machinery access/forced selling of (of machinery – see paragraph directly below), and labour.

8.24 For many farms in Ardleigh and Little Bromley—where landholdings are tightly configured—even small severances or permanent infrastructure can make key operations completely unviable, particularly horticulture and rotational vegetable cropping. This creates significant knock-on effects for farms of all sizes, not least and to name one example - farmers typically own machinery and equipment sized to their existing operational landholding; any reduction in farmable land forces them to sell off essential kit at a further loss. No farmer – big or small can afford to keep equipment and machinery they do not regularly use and that do not provide them with an income. In practice, this means the financial impact is compounded and long lasting, with farmers absorbing major losses through having to engage with the NSIP process, but also from reduced production and from the devaluation of their equipment as well – not the mention the immeasurable mental and physical toll this is having on all affected farmers across the region.

Mitigation – Limitations and Ineffectiveness

8.25 While standard mitigation measures (e.g., soil stripping protocols, aftercare schemes, access management) are routinely proposed for NSIPs, including this one, their effectiveness in Tendring is fundamentally constrained by:

- The intrinsic sensitivity of BMV soils, which suffer long-term productivity loss even under carefully managed disturbance.
- The scale of construction that we are aware of, spanning multiple years and seasons, increasing the risk of cumulative compaction and irreversible soil structure damage – not to mention other NSIPs that may well follow as a result of the NGETs decision to place the infrastructure at the heart of BMV land.
- The permanent change created by pylons and the EACN, which cannot be "mitigated" because land is lost forever.
- The diversion of farming operations, which mitigation cannot meaningfully address once holdings are fragmented.

8.26 TDC accepts that mitigation may reduce harm to a limited extent, but it cannot prevent the loss of BMV land, nor can it restore agricultural units to their pre-project condition.

8.27 Given that reasonable alternative locations and routes are available, the loss of Tendring's best agricultural land is unjustified.

Conclusion

8.28 The N2T project would cause severe, long-lasting and in some cases irreversible harm to Tendring's agricultural land, soil resource, and farm business viability—especially in the uniquely productive agricultural landscape around Ardleigh and Little Bromley. This area contains the only concentration of BMV land within the district, forming the foundation of both local food production and the wider rural economy.

8.29 TDC concludes that mitigation cannot resolve the fundamental problem - the project has been routed through land that should not be developed for major infrastructure at all.

8.30 Avoidance is the only meaningful mitigation, and viable alternatives exist which would dramatically reduce agricultural impacts.

8.31 The Applicant has not justified the loss of Grade 1 and Grade 2 land when less damaging options remain available.

8.32 For these reasons, the agricultural and soil impacts of the Norwich to Tilbury project in Tendring District are considered unacceptable, avoidable, and contrary to both national and local policy, and carry very substantial weight against the proposal in the planning balance.

9. Air Quality

9.1 This section sets out TDC's position on the air quality impacts of the N2T project as they relate to the district. TDC needs to make clear that, for this section and all related sections, our in-principle position on the wide-ranging and unmitigable impacts of the project remains unchanged. As set out in detail elsewhere in this LIR, TDC's view is that the impacts on matters such as air quality could have been avoided entirely had a less harmful location for the EACN and more appropriate route alignment options been selected during the early design and development stages of the project. That said, TDC will continue to engage proactive and collaboratively with the DCO process and insofar as this chapter is concerned. Insofar as this chapter is concerned, TDC has reviewed:

- ES Chapter 7: *Air Quality* (document reference 6.7)
- The Outline Code of Construction Practice (CoCP) (document reference 7.2)
- Associated outline management plans, including the Outline Dust Management Plan; and
- has engaged with National Grid throughout the preparation of the Statement of Common Ground.

9.2 From a technical assessment perspective, TDC holds no counter-evidence to the findings presented in the ES and does not dispute the methodologies used, on the basis that the proposed mitigation measures are fully secured, enforceable, and implemented as described.

Localised Sensitivities in Tendring

9.3 The dispersed rural character of this part of the alignment — including Ardleigh, Little Bromley, and the areas around Bentley Road and neighbouring hamlets — means that sensitive receptors are located very close to new haul roads, temporary compounds, and construction laydown areas. While the ES identifies these receptors, TDC emphasises the need for additional site-specific controls where necessary, including tailored monitoring at high-risk locations and rapid, responsive adjustments to Dust Management

Plans if emission risks rise due to weather, phasing, or unforeseen activities. Responsibility for continuously monitoring all high-risk locations must rest solely with the Applicant, who should act proactively at all times. Affected residents or businesses must not be burdened with cumbersome procedures if their properties or livelihoods are impacted by any deterioration in air quality.

Operational and Maintenance Phase Impacts

9.4 TDC recognises that routine operational air quality emissions are inherently low for overhead line and substation infrastructure. However, the operational assessment is high-level and contains the following assumptions:

- Minimal and infrequent maintenance traffic;
- Rare use of emergency plant (e.g., generators);
- No material changes to underlying traffic flows on local roads.

9.5 TDC notes that this final assumption is potentially optimistic given the region's significant planned growth and increased housing delivery over the next 30–40 years. The ES does not quantify maintenance-related emissions and this should be addressed.

9.6 TDC therefore stresses that:

- Any operational plant must meet or exceed construction-phase emission standards, secured through the DCO;
- TDC (or any equivalent successor organisation) should be consulted on the operational environmental control plans where relevant;
- New information on future traffic growth or maintenance demands should trigger a review of operational air quality risks.

Code of Construction Practice (CoCP) and Implementation

9.7 TDC emphasises that effective delivery of air quality mitigation is wholly dependent on robust oversight and enforcement. Challenges around these areas include:

- The length and rural nature of the construction corridor within Tendring;
- The dispersed pattern of worksites, compounds, and haul road access points;
- The need for frequent inspection, especially during high-risk periods (dry/windy conditions, peak construction) — as required by IAQM guidance.

9.8 With the above in mind the ES and CoCP do not adequately explain:

- How TDC's monitoring and supervision responsibilities will be resourced, or
- How costs associated with enforcement will be supported.

9.9 TDC seeks clarity and appropriate commitments to ensure that local authorities are not expected to absorb the significant resource burden associated with discharging and enforcing these obligations.

Monitoring and Reporting

9.10 Whilst the requirement for dust and air-quality monitoring is welcomed, TDC expects:

- Early (pre-commencement of any construction works) agreement on exact monitoring locations, equipment specifications, and data-sharing mechanisms;
- Provision for TDC to request additional monitoring where risk or complaints increases;
- Full access to complaints logs, site inspection records, and exceedance investigations.

9..11 Monitoring should begin three months prior to works in any given area where feasible (as outlined in the Outline DMP) and continue throughout construction.

Summary

9.12 Whilst TDC accepts the ES conclusions this is strictly on the basis that the mitigation, including additional mitigation as requested above and in the SOCG is secured and effectively implemented. To be clear, TDC stresses the need for:

- Clear enforceability of all measures through DCO Requirements;
- Ability to secure additional site-specific controls in sensitive locations;
- Stronger commitments regarding monitoring-resourcing and local authority enforcement capacity;
- Retention of construction-phase mitigation for any operational plant.
- TDC seeks ongoing engagement in the approval of Dust Management Plans and monitoring strategies at DCO discharge stage.

10 Cumulative Effects

10.1 TDC considers cumulative impacts to be one of the most critical issues arising from the N2T project. Both TDC and ECC have raised these concerns consistently throughout the last 3-4 years. The main issues is that the combined effects of multiple NSIPs concentrated within the north-west Tendring Peninsula have not been fully or appropriately assessed. These concerns remain largely unresolved.

10.2 NGET's ES Chapter 17 acknowledges the requirement to assess both intra-project and inter-project cumulative effects under the EIA Regulations and national policy (NPS EN-1 and EN-5). However, TDC finds that throughout the assessment it underestimates the scale, spatial concentration, temporal overlap, and in-combination harm that will arise when the N2T scheme is delivered alongside NF, FE, and the forthcoming TI. As set out elsewhere in the LIR, the ES also relies on inaccurate or erroneous information that informed key decision such as location of access routes, haul routes, service routes and service route crossing locations (for example at very sensitive and characterful rural lanes).

10.3 The sections below sets out TDC's evidence-based position, drawing on the TDC's and ECC's RR's, NGET's cumulative effects chapter, the SoCG between TDC and NGET (Section 3.10), and ECC's formal consultation position.

Overarching Concerns About Cumulative Effects

10.4 TDC reiterates that the Tendring Peninsula, and particularly the area between Ardleigh, Little Bromley and Lawford, would experience a uniquely intense clustering of high-impact energy infrastructure. As set out in TDC's RR, the chosen location of the EACN, combined with large substation complexes for North Falls and Five Estuaries and the likely landing of the Tarchon Interconnector, consolidates disproportionate burdens within a tightly confined rural area consisting of BMV agricultural land.

10.5 This concentration is a direct consequence of a flawed site-selection process, which TDC believes has been steered more by NGET's and its customers' operational convenience, the premature customer agreements rather than by transparent, balanced, or policy-aligned spatial planning.

Inter-Project Cumulative Effects Underrepresented in the ES

10.6 ES Chapter 17 recognises that inter-project cumulative effects arise when multiple developments affect receptors simultaneously. However, NGET, not surprisingly (given that they consistently underestimate the scale, spatial concentration, temporal overlap, and in-combination harm that will arise) concludes that only a very low number of significant inter-project cumulative effect will be relevant.

10.7 TDC fundamentally disagrees and considers this to be a substantial under-assessment. TDC's RR and indeed this LIR highlight very serious, wide-ranging and consequential cumulative impacts across (list not exhaustive):

- Landscape and visual receptors, particularly given the arc-shaped pylon route imposed by the misplaced EACN location.
- BMV agricultural land, where overlapping land-take from cable corridors, substations and pylons will cause unprecedented irreversible loss.
- Residential amenity, where multiple PAR haul routes, pylon corridors, substations, and construction compounds overlap spatially and temporally.
- Heritage assets, including cumulative setting changes to monuments, conservation areas and rural historic landscapes.
- Community health and wellbeing, due to prolonged intrusive construction periods across multiple projects.
- Traffic and transport, where HGV movements from several NSIPs risk multi-year network saturation in settlements and rural lanes unsuited for heavy vehicles.

10.8 These issues are not identified, quantified, or addressed in the ES, despite clear visibility of their magnitude.

Tendring-Specific Cumulative Impacts - Landscape, Visual and Rural Character

10.9 The ES acknowledges that N2T alone generates widespread major adverse visual effects across north-west Tendring. TDC's RR demonstrates that these impacts will be substantially compounded when considered with:

- The two offshore wind farm substations, directly adjacent to the EACN.
- The multi-corridor underground cable systems entering the EACN.
- The new arc of 50m+ pylons north of Ardleigh, with extreme angular deviation contrary to the Horlock Rules.
- The anticipated Tarchon corridor, whose precise routing is unknown but will interact spatially with N2T.

10.10 Taken together, these projects will fundamentally and permanently alter the landscape character of the Tendring Peninsula, including parts of the Dedham Vale National Landscape, in ways not fully reflected in the ES cumulative assessment.

Agriculture and Soils (BMV Land)

10.11 TDC's RR and indeed this LIR provide compelling evidence that BMV land in north-west Tendring is both rare and critically important. The combination of multiple NSIPs creates overlapping, extended construction footprints, compounding:

- Land sterilisation
- Soil degradation
- Construction compaction
- Fragmentation of viable agricultural units

10.12 The ES treats agricultural cumulative effects narrowly, failing to characterise the magnitude of multi-project concurrent land loss.

Traffic, Transport and Haul Route Impacts

10.13 Whilst Traffic and Transport impacts are covered in detail in section 19 below it requires specific attention here given its wide-ranging and interlinked nature in the context of assessing cumulative effects. The ES Chapter 17 recognises the potential for cumulative traffic impacts given shared infrastructure and overlapping construction programmes, particularly between N2T, NF and FE.

10.14 However, TDC finds that:

- The cumulative traffic assessment is high-level and insufficient at Tendring district level – many aspects remain unresolved.
- The sensitivity of narrow rural lanes in Ardleigh, Little Bromley and Lawford is not accounted for.

- The EACN's remote rural siting (unlike an A12-adjacent alternative) forces large volumes of construction traffic into the least resilient road environments.
- The ES assumes programme coordination between NSIPs, but does not secure it through binding commitments – therefore no weight can be given to these assumptions unless they are legally secured through binding commitments.

10.15 TDC's RR and this LIR set out clear evidence that traffic-related cumulative harm will be among the most severe and longest-lasting impacts in the district.

Community Health and Wellbeing

10.16 ES Chapter 17 acknowledges that cumulative health impacts must be considered under NPS EN-1.

10.17 TDC and ECC agree that:

- Chronic stress, sleep disturbance, construction noise, vibration, and prolonged uncertainty will create compound socio-psychological harms.
- These impacts disproportionately affect small rural settlements such as Ardleigh, Little Bromley and the dispersed hamlets between them.
- NGET has not provided any holistic assessment of how multi-year, multi-project construction will affect mental health, social cohesion, access to services, and recreational assets.

10.18 This omission is regarded as a major deficiency in the ES.

Historic Environment

10.19 ECC's position (RR October 2025) states that cumulative effects on designated assets—particularly setting change—are accepted for the N2T project taken in isolation but become more harmful in combination with other planned NSIPs.

10.20 This is inadequate, as TDC's RR and the relevant chapter (focussing on Heritage Assets in TDC – covered below) shows multiple heritage receptors near Ardleigh and Little Bromley will experience:

- Large-scale industrialisation of their rural context
- Visual coalescence of substations, pylons, haul roads and compounds
- Multi-year construction activity creating harmful sensory effects

Limits of Deviation and 'As-Built' Uncertainty

10.21 ECC's consultation response raises explicit concern regarding the limits of deviation permitted in the Draft DCO, arguing that these create unpredictable cumulative outcomes as construction proceeds.

10.22 TDC fully supports this position.

10.23 The ES cumulative effects chapter relies on fixed spatial assumptions that are not secured. Any variation permitted by the DCO may:

- Bring infrastructure closer to properties
- Shift haul routes onto even more unsuitable lanes
- Expand working widths
- Increase vegetation loss
- Alter drainage patterns

10.24 NGET has not assessed how such flexibility interacts cumulatively with other NSIPs.

Intra-Project (Within N2T) Cumulative Impacts

10.25 Although the ES identifies several significant intra-project cumulative effects on PRoW users, it concludes that no additional mitigation is required.

10.26 TDC disagrees with this finding, including:

- Combined noise, visual, access and severance effects on PRoW networks in Ardleigh and Little Bromley will be highly disruptive, multi-year, and not easily mitigated.
- The compounding of noise + traffic + dust + landscape harm for residents and businesses in north-west Tendring is far more severe than the ES suggests.
- The ES "professional judgement" approach underestimates lived-experience harm across multiple receptor pathways.

Conclusions and Required Actions

10.27 TDC concludes that the current cumulative effects assessment:

- Fails to recognise the extraordinary concentration of nationally significant energy infrastructure in the Tendring Peninsula.
- Undervalues the sensitivity of rural communities, heritage landscapes, and BMV farmland.
- Overstates the mitigating effect of programme coordination that is not secured.
- Ignores or downplays cumulative effects that will be severe, long-term and irreversible.

10.28 TDC therefore requests that the ExA require:

1. A revised cumulative effects assessment, integrating all NSIPs known to be functionally and spatially linked to N2T.
2. Legally binding coordination mechanisms across N2T, NF, FE, and TI, including aligned construction timetables and shared mitigation strategies.
3. Full cumulative landscape and visual modelling covering the EACN cluster, windfarm substations, pylon corridor and cable corridors.
4. A cumulative agricultural land-take analysis, including soil degradation and long-term farm viability impacts.

5. A comprehensive rural transport cumulative assessment, with modelling of overlapping HGV schedules.
6. An accurate, realistic, properly informed and cumulative health and wellbeing assessment, as required by EN-1 and statutory guidance.
7. Secured, fully enforceable mitigation addressing cumulative impacts, not just impacts from N2T alone.

11 Contaminated Land and Geology

11.1 Within Tendring District, the N2T project largely crosses agricultural land (which will have major implications for the agricultural sector as set out elsewhere in this LIR) and TDC agrees that these areas have a low likelihood of historic contaminative uses. The ES (Chapter 9) identifies only very limited areas where existing contamination may pose a moderate risk. TDC holds no conclusive evidence to dispute this and is, on balance satisfied that the Applicant's proposed mitigation—including site-specific investigations and strict construction controls secured through the Outline Code of Construction Practice—will ensure that these low-level risks are properly managed, and that no significant adverse effects should arise.

11.2 Geologically, the route interacts with common superficial and bedrock deposits in Tendring, and the ES confirms that no impacts on geological conservation interests are expected. Again TDC holds no conclusive evidence to dispute this position. The District also contains areas of Secondary and Principal Aquifers; however, groundwater is generally (but not exclusively) expected to lie below excavation depths, and TDC holds no counter evidence to conclusively suggest that, with mitigation and strict construction controls, dewatering or aquifer disturbance will occur. Nonetheless, TDC expect utmost clarity and commitment that groundwater quality will not be affected by this development. For example, groundwater risk assessments and protection measures should be secured and put in place—particularly around known abstractions, well before any works in potentially affected areas commences. Provided all of these measures can be secured, TDC is on balance satisfied that risks to groundwater quality, flow and private water supplies will remain low

11.3 Overall, TDC holds no technical objections to the Applicant's assessment for contaminated land, geology or hydrogeology in Tendring, subject to further clarity on matters raised above and provided that all proposed mitigation is fully secured, implemented, and monitored. On this basis, TDC considers that these topics do not constitute areas of significant concern for the District.

12 Coordination with other projects

12.1 TDC remains concerned about the absence of a meaningful, long term strategic, meaningful and proactively coordinated approach between the N2T project and other major NSIPs affecting the district, in particular the ALBA — the projects include (but are not limited to):

- North Falls Offshore Windfarm,

- Five Estuaries Offshore Windfarm,
- Tarchon Interconnector,
- Associated substation and grid reinforcement proposals around Ardleigh / Little Bromley.

Tendring-Specific Cumulative Risks

12.2 In terms of Highways & Construction Traffic Pressure, the ALBA faces severe risk from overlapping construction traffic associated with N2T and the offshore windfarm grid connections. ECC Place Services highlight that cumulative effects in Tendring are likely to be significant and adverse, yet NGET's Chapter 17:

- confirms significant adverse cumulative traffic and landscape impacts,
- acknowledges dialogue with other promoters,
- but provides no binding or enforceable mitigation.

12.3 TDC considers the following highways risks to be particular acute and concerning:

- Simultaneous use of narrow rural lanes such as Wick Lane, Little Bromley Road, Ardleigh Road, Crown Lane, Old Ipswich Road and the A137 / A120 feeders.
- Multiple haul roads and access tracks being established independently by different promoters, leading to duplicated land take, repeated landscape loss and potential highway safety issues if not properly co-ordinated.
- HGV movements overlapping during morning and evening peak times, causing danger, severance and long-term loss of rural quietness, as evidenced by Tendring's LPA landscape assessments.
- Inadequate safeguards to prevent conflicting and un-coordinated road closures or diversions, risking disruption to:
    - Bus routes
    - School travel
    - Agricultural seasonal operations
    - Emergency response access

12.4 These risks are magnified by Tendring's predominantly rural road network, which has limited resilience, few alternative routes, and high agricultural and community dependency.

Community Disruption

12.5 Without the strong coordination that TDC has repeatedly asked for:

- The same communities (Ardleigh, Mistley, Little Bromley, Lawford, Great Bromley) may experience consecutive or simultaneous HGV flows, dust, noise and light pollution over a period extending to a 6-7 years and potentially up to decade.
- Local businesses — including horticulture, hospitality and logistics — risk repeated access delays and loss of trade.

- Protected and/or Characterful Lanes (such as Wick Lane, Little Bromley Road, Ardleigh Road, Bentley Road) face traffic safety risks and permanent degradation of their rural character.
- Residents will be exposed to unrelenting visual and noise disturbance, with NGET's own ES predicting major adverse visual effects in parts of Section C up to 1.5–2 km from the Order Limits and the PAR's in TDC.

Environmental and Landscape Harm

12.6 In summary, ECC's and TDC's landscape analysis identify:

- The Bromley Heaths LCA as highly susceptible to change, with the proposed N2T pylons resulting in major adverse impacts up to 1 km and significant effects out to 2 km.
- The cumulative presence of offshore windfarm grid infrastructure risks transforming a currently undeveloped rural landscape into an "industrialised corridor."
- Repeated works, access tracks, vegetation clearance and reinstatement attempts create fragmented habitats and a prolonged disturbed landscape.

12.7 NGET's ES suggests these cumulative effects are "not significant" after mitigation — TDC does not agree, given the volume of overlapping projects and the sensitivity of Tendring's rural environment.

Deficiencies in National Grid's Approach

12.8 TDC highlights significant gaps in NGET's cumulative coordination strategy (ES Chapter 17):

- Coordination meetings are described but not secured or structured, with no required outputs.
- There is no shared construction programme, and no mechanism to avoid overlapping peak periods.
- There are no binding requirements or contracts for shared haul roads, joint compounds or co-location of infrastructure.
- There is no integrated highways plan, despite clear cumulative risks.
- Most of the cumulative mitigation is at this stage optional, non-committal and unenforceable.

12.9 This is insufficient for a district facing the greatest infrastructure convergence along the route. TDCs therefore suggests the following additional required actions and recommendations and requests that the ExA require the following as DCO Requirements or Obligations (this is in addition to the mitigation already proposed by NGET which TDC consider to be insufficient for the wide ranging reasons set out herein and in previous correspondence):

Legally Binding Inter-Project Coordination Framework

12.10 A compulsory, multi-promoter (as a minimum to include NF, NF and N2T) coordination mechanism must be secured, including:

- Shared construction timetables
- Joint planning of peak-impact phases
- Formal reporting to ECC Highways & TDC or any subsequent newly formed combined authority
- A requirement for quarterly joint coordination boards chaired by ECC or TDC

Integrated Traffic and Highways Management (District-Wide CTMP)

12.11 A single, multi-project Construction Traffic Management Plan for Tendring, requiring:

- Jointly agreed HGV routing
- Restrictions on peak-time movements
- Prohibition of simultaneous closures on key links
- Shared traffic monitoring
- Mitigation triggers (e.g., when HGV volumes exceed thresholds)
- Coordination with Essex Police, emergency services, parish councils, freight operators and local bus providers

Shared Use of Infrastructure to reduce land take

12.12 All promoters must be required to:

- Share haul roads
- Coordinate temporary compounds
- Co-use cable corridors where feasible
- Restore land jointly to avoid repeated disturbance

Enhanced and Unified Community Communications

12.13 A single coordinated communications plan must be implemented, including:

- One “front door” for construction queries so that affected communities are not send pillar to post to have their concerns heard
- Integrated public notices with useful information and up to date contact numbers and details
- Predictive and accurate information on upcoming traffic impacts allowing affected residents and businesses to plan ahead
- A Tendring-specific community liaison officer empowered across all projects

Tendring-Specific Updated Cumulative Impact Assessment (CIA)

12.14 A live, rolling CIA with regular updates on a well maintained and accessible website/online platform should be required for:

- Pre-development ground investigation works (such as archaeological digs etc)
- Traffic
- Landscape
- Noise
- Air quality
- Community effects

Monitoring and Adaptive Management

12.15 Multi-project monitoring must be secured, with:

- Real-time data sharing
- Joint incident response
- Requirements to change construction methods or timings where cumulative harm emerges

Other Additional Measures Requested by TDC

12.16 The following additional measures are considered necessary and reasonable given the cumulative harm that will ensue, the lack of appropriate and meaningful mitigation and project co-ordination measures put forward by the Applicant:

- A Tendring NSIP Coordination Board with the power to require justified phasing adjustments and additional monitoring/monitoring equipment to be installed.
- A Community Impact Mitigation or Resilience Fund, jointly funded by all NSIP promoters.
- A multi-project emergency access protocol to safeguard ambulance and fire coverage.
- Additional viewpoints and landscape analysis extending beyond 1.5 km for Section C, as ECC flagged significant gaps.
- A requirement for all promoters to contribute to road condition surveys and post-construction repairs on all affected rural lanes and A-routes in TDC.

Conclusion

12.17 TDC faces one of the most intense and complex clusters of energy infrastructure projects anywhere along the N2T alignment. Without strong, enforceable coordination highways impacts will become severe and prolonged, communities risk multi-year disruption,

landscapes and protected lanes will suffer cumulative degradation, and public confidence in the planning system will erode.

12.18 TDC therefore urges the ExA to require clear, binding, enforceable inter-project coordination measures and to strengthen cumulative impact management across all NSIPs affecting the district.

13 Construction Noise and Vibration – Working Hours

13.1 TDC considers that construction noise and vibration impacts have been under-assessed and insufficiently controlled for the areas in Tendring. TDC considers that communities along Bentley Road, Shop Road, Church Road and Ardleigh Road in Little Bromley, as well as residents living around the EACN and in areas to the north, east and west of Ardleigh, will face prolonged and significant impacts from the project. These effects are, in TDC's view, not adequately mitigated, and in several instances the mitigation proposed is either insufficiently robust or not realistically enforceable under the current Outline CoCP and draft DCO.

13.2 TDC's main concerns are:

- NGET's "relative worst-case" approach does not test the true worst-case scenarios that could arise from the draft DCO's Limits of Deviation (LoD) and overly flexible construction phasing, particularly at pylons and along cable corridors.
- Weekday, Weekend and night-time working are left too flexible. The ES assumes Best Practicable Means (BPM) will keep weekend impacts under the 10 dB lower thresholds, but does not guarantee this in practice, and the Outline CoCP does not secure necessary restrictions at sensitive receptors in Tendring. There are little to no controls curtailing 'extreme end' flexible Weekend and night-time working and these flexibilities are available to NGET without any measurable or quantifiable limitations leading to little or no respite for affected residents and businesses.
- Reliance on future contractor re-assessment pushes key decisions to post-consent and does not provide sufficient certainty now to protect residents.

13.3 TDC therefore seeks binding DCO Requirements and LoD controls that deliver receptor and location-specific working-hours limits, method controls and monitoring with enforceable triggers for the Tendring hotspot locations identified below.

What the ES and CoCP say

13.4 Method, thresholds and study areas:

- The ES Chapter 14 uses standard UK methods for assessing construction noise and vibration. Generally speaking it looks at noise effects up to about 300 metres away and vibration effects up to about 100 metres away – this particular ES chapter does not factor in current unknowns such as specific placement of speed mitigation measures that may be needed along areas such as the altered Bentley Road (reserved for future DCO requirements) and therefore it does not fully factor in noise and vibration effects on nearby properties/residents that could stem from such features. For construction traffic, the ES uses the usual UK road-noise calculation methods like

Calculation of Road Traffic Noise and *Design Manual for Roads and Bridges* (CRTN and DMRB). The chapter also applies stricter limits in the evenings, at weekends, and at night. For example, the noise level considered a significant impact in the evening or at weekends is 55 dB, compared with 65 dB during normal weekday daytime, and this limit drops to 45 dB at night.

- Near the proposed EACN, the ES shows that the area is currently very quiet, with typical rural background noise levels during the day around 26–34 dB and at night around 21–25 dB. Because it is already so quiet, people living or working nearby are more likely to notice and be affected by any construction noise or vibration, even at relatively low levels

13.5 TDC's concern: the ES says assessments reflect a "reasonable worst case" but:

- For underground cables it appears to assess to the edge of the red line, yet for pylons it assesses from the edge of a localised working area (c. 60 m^2 for standard, 70–80 m^2 for angle towers) rather than the full Order Limits envelope – this approach is inconsistent. Moreover it has not tested alternative pylon positions within lateral/longitudinal LoD, even though average spans (~330 m) currently permit (what TDC considered be) *meaningful* shifts much closer to sensitive receptors such as housing. This omits the true worst case and is particularly problematic for Little Bromley and Ardleigh-side properties, and should be addressed.

Embedded and standard mitigation; post-consent reassessment

13.6 ES Chapter 14 and the Outline CoCP propose BPM measures such as acoustic screening, quieter plant, non-percussive piling "where practicable", and a Noise & Vibration Management Plan with detailed assessments (to be done by the Main Works Contractor) before works start.

13.7 TDC's concern: the proposed measures are deferring the critical (and currently unknown) choices (i.e. methods, sequencing, temporary barriers, receptor-specific controls) until after consent. With rural L90s in the low 20s–30s around the EACN and even lower in the linear areas around PAR30 (which is precisely an area what will become an extremely busy construction route), margins are tight; assumptions that BPM will avoid exceedances at weekends or nights are not assurances. TDC asks for front-loaded, enforceable controls at this stage and to afford the comfort and assurances to affected residents, not promises or best hope scenarios / contractor studies later.

13.8 Working hours

- Draft core hours are: 07:00–19:00 Mon–Fri and 07:00–17:00 weekends & bank holidays; *with* extremely broad exceptions (trenchless crossings, conductor installations, jointing, highway requests, commissioning/testing, weather delays, emergencies etc). The ES states "No intention" (too broad a statement and open to interpretation) for routine night working but several activities may be 24/7 (e.g., trenchless) or outside core hours. Start-up/close-down add +/- 1 hour either side.

- The ES acknowledges weekend/evening thresholds are 10 dB lower than weekday daytime and significant effects may still occur without mitigation; yet it assumes temporal restrictions/BPM will keep weekends 'not significant'—without receptor-specific exclusions where needed.

13.9 TDC's concern: early mornings (i.e. before 7am)/late afternoon/early evenings (i.e. after 18:30pm),as well as weekend/evening/night noise at rural background levels (which is known to be very low in the most severely affected ALBA areas) risks notable adverse and significant adverse effects in ALBA if not individually constrained and mitigated. Again the ES assumes compliance; it does not secure it.

Receptors and Tendring hotspots requiring enhanced protection

13.10 Given the low ambient noise levels and proximity of works (pylon foundations, conductor stringing, cable joint bays, trenchless crossings, EACN construction and batching activity), TDC identifies the following priority locations for stricter controls:

- Little Bromley (Bentley Road, Shop Road, Church Road, Ardleigh Road) — ribbon housing and farms close to proposed works and to highways mitigation compounds at Bentley Road/Church Road and Ardleigh Road/Little Bromley Road/Grange Road; secondary cable compound at Little Bromley Road (Badley Hall); potential trenchless works and jointing.
- EACN environs (west/north/east of Ardleigh) — again very low L90s and multiple concurrent and in combination activities will take place here (substation civil works, plant installation/commissioning, temporary batching/laydown, cable jointing, overhead line interfaces).

TDC's requested DCO controls (draft wording themes)

13.11 To remedy the current uncertainty and protect TDC's most severely affected communities, TDC requests the ExA to secure the following Requirements/Obligations (mirroring, where relevant, Bramford-to-Twinstead safeguards on receptor-specific limits and restricted hours):

True worst-case assessment and LoD control

13.12 Pre-commencement: Require an accurate, all capturing Receptor-Specific Construction Noise & Vibration Assessment (RSCNVA) that:

- models pylon works to the full lateral/longitudinal LoD envelope (not just nominal pads),
- tests alternative pylon positions within LoD nearest to noise-sensitive receptors (NSRs), and
- applies the lower evening/weekend/night thresholds and temporal significance criteria from ES Chapter14.

13.13 If the noise modelling shows that impacts will be too high for a noticeable amount of time — for example if the effect is rated "medium" for 10 days or more within 15 days, or 40 days or more within six months — then the RSCNVA must step in before any work starts. They must either tighten the allowed area where the pylon can be built (a smaller micro-LoD) and/or require changes to how the work is done. These changes could include using quieter, non-percussive piling, adding extra noise barriers, or swapping out machinery for quieter options.

Working hours – receptor-specific restrictions

13.14 No routine weekend working within 250 m of the following road frontages:

- Bentley Road, Shop Road, Church Road, Ardleigh Road (Little Bromley);
- Dwellings surrounding the EACN;
- All other NSRs north/east/west of Ardleigh identified through the RSCNVA.

13.15 No percussive piling at any time on Sundays or nights; and no percussive piling on Saturdays after 13:00 within 400 m of the above NSRs. (ES Chapter 14 already recognises piling as a worst-case source; the Outline CoCP's current blanket allowances are too broad for rural Tendring.)

13.16 Night-time works (including trenchless 24/7 phases) only where the RSCNVA demonstrates:

- SOAEL not exceeded,
- LAmax controls and tonal/impulsivity penalties managed, and
- a pre-agreed complaints response and respite plan for residents.

13.17 Simplistically put, safeguards should be put in place for affected residents to ensure that **night-time working becomes a last resort**, and only proceeds when:

- Noise will be kept at safe and tolerable levels.
- The most disruptive types of noise are properly controlled.
- Residents have safeguards, clear communication channels, and guaranteed support if issues arise.

13.18 If the developer cannot meet these tests and if these safeguards cannot be transferred to the DCO, then night-time works cannot happen.

Method controls at pylons, joint bays and compounds

13.19 Foundation methods: Use non-percussive techniques (pad foundations, press-in piles, pre-boring) by default within 250 m of NSRs.

13.20 Temporary screening: Minimum 10 dB insertion loss screening around semi-static plant/jointing rigs/compounds where lines of sight exist to NSRs within 250 m; acoustic sheds for trenchless drive sites close to NSRs (ES indicates up to 15 dB benefit).

13.21 Batching plant and compounds near Little Bromley/Ardleigh to be re-sited or re-oriented to shield NSRs where RSCNVA shows exceedance risk, with fixed hours aligned as set out above.

Real-time monitoring & adaptive management

13.22 Install continuous Class 1 monitors (noise) with event capture and PPV vibration monitors at multiple agreed representative facades (at least three months before any construction commences) on:

- Bentley Road / Shop Road / Church Road / Ardleigh Road frontages;

- EACN-side receptors (west/north/east of Ardleigh).

13.23 Trigger-action-response plan (TARP):

- With Early warning system,
- Immediate stop-and-review if SOAEL is reached or PPV ≥ 1.0 mm/s at occupied dwellings (human perception/complaint risk),
- Method changes within 24 hours (plant swap, barrier height increase, re-sequencing),
- Report exceedances to TDC (or equivalent subsequent authority) within one working day and publish weekly dashboards.

Complaints, liaison and respite

13.24 Promotor funded Named and Dedicated Tendring Noise & Vibration Liaison Officer with 24/7 line; same-day site attendance for complaints during active works; quiet-hour windows agreed in advance for the most sensitive frontages during prolonged phases.

Construction traffic noise

13.25 Where the BNL increase ≥ 3 dB on residential links (DMRB threshold), require temporary speed controls, acoustic surfacing, marshalled convoys, or routing changes.

13.26 Why these controls are necessary and reasonable

- Low rural backgrounds around the EACN mean that even "ordinary" daytime activities risk breaching LOAEL and approach SOAEL at short ranges. The ES itself cites daytime SOAEL 65 dB, evening/weekend 55 dB and night 45 dB — 10 dB lower at weekends and nights — materially reducing headroom. The draft DCO/CoCP allows broad and wide-ranging weekend and out-of-hours exceptions without receptor-specific guardrails.
- The assessment envelope for pylons is too narrow. LoD flexibility in the DCO could bring works closer to homes (span spacing ~330 m average), yet the ES did not systematically and consistently test alternate pylon positions nearer NSRs. A micro-LoD tied to RSCNVA results is a proportionate fix.
- The promoter's current package of mitigation does not secure outcomes. TDC respectfully ask the ExA to convert the applicant's aspirations into binding pre-commencement conditions with additional monitoring/triggers and explicit method/working-hours constraints at named Tendring hotspots, aligned with the suggested additional mitigation set out herein.

Conclusion

13.27 TDC respectfully requests that the ExA:

1. Pays close attention to TDCs argument that the ES under-represents worst-case construction noise/vibration in Tendring due to limited LoD testing at pylons and an over-reliance on BPM and future NVMPs.

2. Imposes the additional DCO Requirements reflecting as set out above, including receptor-specific weekend/night restrictions and non-percussive methods by default near Little Bromley/Ardleigh NSRs.

3. Requires a Tendring Construction Noise & Vibration Scheme (pre-commencement) comprising the RSCNVA, monitoring plan, TARP, complaints protocol, and micro-LoD siting locks where needed.

4. Directs the promoter to update the Outline CoCP to include these place-specific controls and to secure them through Requirement 4 with TDC as approving authority for the Tendring elements.

14 Impacts on Health and Wellbeing

14.1 TDC remains seriously concerned that the N2T project will generate material adverse health and wellbeing impacts for communities in Ardleigh, Little Bromley, Lawford, Manningtree and Mistley, particularly along key PAR's (notably Bentley Road) and near construction compounds and work fronts. TDC considers that ES Chapter 10 – Health and Wellbeing systematically downplays local impacts by relying on population-level judgements and one-sided "after-mitigation" significance tests, which mask severe, highly localised effects in Tendring's quiet rural settlements and among vulnerable groups.

Tendring Context and Vulnerability

14.2 The ES classifies Ardleigh & Little Bromley as "low sensitivity" and Lawford, Manningtree & Mistley as "medium sensitivity", despite Tendring having the highest income deprivation, child poverty and fuel poverty rates in the wider study area, low life expectancy, and worsening mental health indicators. This classification underestimates vulnerability and local health inequalities relevant to impacts (i.e. noise, traffic, access, amenity etc.).

14.3 The most severely affected residents and communities, almost without exception, sit in extremely low background noise, rural environments, so any increase from heavy construction traffic and works compounds will be acutely intrusive, compromising sleep, rest, outdoor amenity and mental wellbeing; yet this sensitivity is not adequately reflected in ES significance judgements, judgements that are lacking lived experience.

Construction traffic noise and vibration (Bentley Road and local lanes)

14.4 The ES acknowledges a very significant (negative) construction traffic noise impact on PAR 30 – Bentley Road and identifies one Noise Sensitive Receptor (NSR) with a likely significant effect (pre-mitigation). However, the ES appears to treat this as isolated and then reverts to a "negligible/not significant" conclusion at population level, despite multiple similarly exposed properties, and the exceptionally low rural baseline. This approach is inaccurate and misleading, it dilutes lived realities and underestimates cumulative amenity and mental health effects.

14.5 TDC's position is that standard measures (such as generic BPM and discretionary wording in the CoCP) are insufficient to protect residents in Ardleigh/Little Bromley and along all primary access road and other roads that will be used for construction traffic, in particular Bentley Road where prolonged HGV flows and night/evening activities would be highly disruptive to sleep, family life and mental wellbeing. As set out elsewhere in this LIR and in TDCs SOCG with NGET, additional, location-specific mitigation and enforceable limits are required.

Mental health and wellbeing (construction and operation)

14.6 The ES conveniently adopts a population-level, qualitative framework and then systematically downplay impacts and concludes "minor/negligible (not significant)" for Tendring—despite Tendring's documented mental health vulnerabilities, higher self-harm admissions, lower life satisfaction, and community anxiety around EMF risks, visual change and prolonged disruption. No health monitoring framework or Tendring-specific mental health baseline is proposed. This points to a 'box ticking' approach towards health and wellbeing assessment rather than targeted, locational specific health and wellbeing impact assessment having proper and genuine regard to the scale and magnitude of the impact and the disproportionate concentration of infrastructure in one particular area.

14.7 During operation, the ES accepts perceived EMF risks may affect wellbeing but again offers no additional mitigation beyond generic information measures. Given project clustering and the EACN proximity to Tendring communities, this is inadequate.

Access, severance and PRoW/active travel

14.8 The ES relies on temporary PRoW diversions and two NMU routes to claim negligible/minor health effects; but in Tendring's rural context, long detours, loss of tranquil routes, and perceived danger near noisy and intimidating HGV flows will reduce physical activity, constrain social interaction and harm wellbeing, especially for children, older people, disabled residents and low-car households. Local, ward-scale disruption is not credibly reflected in the ES's area-wide judgements.

Visual amenity and place attachment

14.9 The ES concludes minor/not significant health implications from visual amenity loss during construction and operation in Tendring. TDC disagrees: new pylons/gantries, compounds, haul roads, and substation-related works will erode rural character and place attachment, with mental wellbeing consequences in nearby hamlets and farmsteads that have no visual resilience to industrialisation.

Methodological Issues that Understate Tendring Effects

14.10 After-mitigation significance: The ES determines significance only after assuming full efficacy of generic, contractor-developed mitigation. This front-loads optimism, incorrectly assumes that any and all mitigation will be successful (which it will not) and conceals harm, contrary to TDC experience of similar linear NSIPs and large scale development proposals where traffic/noise controls almost always underperform on rural lanes.

14.11 Population-level 'averaging': Ward-level "sensitivity" ratings (e.g., "low" for Ardleigh & Little Bromley) are used to down-weight street/settlement-level harm (e.g., Bentley Road

cluster), masking disproportionately concentrated effects on what will in reality be a very high number of highly exposed households and vulnerable residents.

14.12 Insufficient local baselines: there is no bespoke Tendring mental health baseline, no receptor-level wellbeing data, and limited site-specific noise/vibration evidence for rural hotspots. This erodes confidence in the ES's "negligible" findings and deny very real and significant health and well-being impacts

14.13 Cumulative impacts: The ES does not adequately treat cumulative and in-combination stress from multiple NSIPs and parallel construction programmes affecting the same Tendring communities, a key driver of prolonged anxiety, sleep disturbance and loss of control

TDC's position on Likely Health & Wellbeing Effects in Tendring

14.14 Having regard to local baseline vulnerability and realistic construction scenarios, TDC's view is that without further enforceable, Tendring-specific commitments, the project will likely cause:

- Major to moderate adverse (i.e., significant) health and wellbeing effects at settlement level in Ardleigh/Little Bromley (including vast areas in between the two settlements as well as Bentley Road frontage, near haul routes/compounds) through prolonged noise, HGV disturbance, severance and loss of amenity, with heightened mental health impacts on vulnerable groups.
- Moderate adverse cumulative wellbeing impacts across affected PRoW networks and rural businesses/recreation assets in northern/western Tendring from long duration, repeating closures and diversions, and loss of rural tranquillity.
- Ongoing operational anxiety linked to perceived EMF risks and residual visual industrialisation, with no targeted programme to mitigate psychosocial stress in the most exposed Tendring communities.

Requested TDC specific Commitments and Securing Mechanisms

14.15 TDC requests that the ExA require the following Tendring-specific measures (to be secured via Requirements, certified plans or legal obligations), in order to avoid, reduce and remedy local health and wellbeing harm:

14.16 Construction Traffic/Noise Controls for Bentley Road and Adjacent Lanes

- Capped daily HGV flows, time-of-day restrictions, no evening/night HGVs, and advance works black-outs during sensitive periods (e.g., school runs).
- Mandatory low-noise surfacing, temporary traffic calming, and on-plot acoustic protection (temporary or permanent) where modelled/monitored triggers are exceeded.
- Real-time noise and vibration monitoring at agreed receptors with publication dashboards and automatic stand-down/escalation protocols tied to numeric thresholds.

14.17 Health & Wellbeing Monitoring Framework (Tendring)

- A co-designed baseline and monitoring programme (with TDC, ICS/Public Health, local practices and community reps) covering sleep disturbance, stress/anxiety indicators, complaint analytics, PRoW usage and access to services, with quarterly public reporting and mitigation "triggers".

14.18 PRoW, NMU and Safe Movement Package

- Mapped, fully segregated NMU routes where HGVs intersect with everyday pedestrian/horse-rider movements; short, signed diversions with quality surfaces/lighting where appropriate, and continuity of rural leisure routes.
- Micro-grants for community route guardianship, wayfinding, and rural wellbeing walks during construction phases.

14.19 Targeted Psychosocial Support & EMF Communications

- Independent, clinician-led drop-ins and fast-tracked signposting for construction stress and sleep problems; evidence-based EMF engagement with accessible materials, local Q&A sessions, and named liaison for Tendring residents.

14.20 Community Liaison & Complaints Resolution

- A single, visible Tendring liaison team, minimum service standards (response times, case tracking), and binding escalation to pause activities if agreed noise/traffic limits are breached pending remedial action.

14.21 Cumulative Impact Management

- A Tendring Construction Coordination Plan aligning programmes across NSIPs (traffic windows, noisy works), with joint dashboards and cross-promoter escalation to protect community health and wellbeing

15 Historic Environment

15.1 TDC considers that the Norwich to Tilbury Project would cause serious and avoidable harm to the historic environment within Tendring—most acutely around Ardleigh, a historic settlement with a number of listed buildings and a conservation-area core—because the proposed arc of new pylons and associated infrastructure would intrude into the settings of a large number of designated and non-designated heritage assets. The limits of deviation (LoD) sought in the draft DCO would further increase the risk and degree of harm by allowing the line to move closer to sensitive assets and increase pylon heights post-consent. On the evidence before the Council, the Applicant's ES under-reports the scale and severity of setting effects on Tendring's heritage and under-assesses non-designated heritage assets (NDHAs). Accordingly, TDC's assessment is that residual impacts in Tendring would be severe, and the scheme (as submitted) is not acceptable without fundamental design changes and/or enforceable requirements targeted at Tendring.

What is special and sensitive in Tendring

15.2 Ardleigh historic settlement and Conservation Area (CA) : an historic core with multiple listed buildings and sensitive streets/lanes whose historic rural setting contributes to

the significance and character of the CA; the proposed arc-shaped pylon route north/west/east of Ardleigh would intrude widely into that setting.

15.3 Designated assets with high sensitivity to setting change in Section C (Tendring), including (illustrative, list not exhaustive):

- Church of St Mary, Ardleigh (Grade II*), Lowe Hill House (Grade II*), and several Grade II farmhouses and houses in the Ardleigh hinterland (Birch House Farmhouse; Higham Hall; Lark Hall; Pintins; Tiffins; Mulberry House; Bounds Farmhouse) identified in the ES assessment tables and baseline as within the study area for setting effects.

- Scheduled cropmark complex south of Ardleigh (e.g., "Crop Mark Site S of Ardleigh") and other cropmark/archaeological complexes east/south-east of Ardleigh with demonstrated archaeological sensitivity from geophysics and trial trenching.

15.4 Little Bromley: listed War Memorial (Grade II) with identified construction-vibration vulnerability; Place Services also highlight adjacent listed cottages that were not assessed for vibration but are plausibly at risk.

15.5 Protected lanes, hedgerows and veteran trees forming part of the historic landscape character around Wick Lane, Dead Lane, Home Farm Lane and Little Bromley Road, integral to setting and legibility of assets. (Noting inconsistencies reported in Applicant's arboricultural/TPO mapping that complicate heritage risk control.)

Where and how the Project harms heritage in Tendring

15.6 Ardleigh: concentrated, multi-asset harm

- The pylon arc that swings around Ardleigh would industrialise the rural setting of the conservation-area core and multiple listed buildings, introducing prominent, moving skyline elements and wire-scape that would be perceived across open farmland and valley edges. The ES recognises numerous Tendring assets within the 2–3 km study area and assesses several as experiencing adverse setting effects; however, its conclusion that most effects are not significant does not reflect the concentration, coherence and visibility of the arc around Ardleigh.

- For certain assets (e.g., Bounds Farmhouse) the ES itself records significant residual effects, and for others (e.g., Church of St Mary; Lowe Hill House; several Grade II farmsteads) it records medium/temporary adverse effects during construction—an under-estimation in TDC's view given the permanent alteration of setting from 40–50 m pylons and continuous conductors.

- LoD risk: Article 5 (of the DCO) currently allow lateral moves up to 50 m and height increases up to +6 m (or +18 m where switching pylon type)—making already harmful relationships materially worse by bringing structures closer to façades, churchyards and landmark views that are key to significance. ECC Place Services expressly warn Tendring assets could step up a harm band because of LoD.

15.7 Non-designated heritage assets (NDHAs) are under-assessed

- The Applicant's approach does not assess setting for low-value NDHAs and has not expressed impacts on built NDHAs in "harm to significance" terms, contrary to the balanced-judgement requirement in EN-1 §5.9.33. This systematically under-captures effects on historic farmsteads, lanes and locally listed buildings that together comprise the living historic landscape of Ardleigh and its parishes.

15.8 Construction-vibration risk in Tendring is real and needs binding control

- The ES (Noise & Vibration) identifies structures in Tendring with potential construction-vibration damage risk, including the Little Bromley War Memorial; Place Services note nearby listed cottages likely share that risk but are omitted. The Outline CoCP relies on a generic NVMP but does not secure asset-specific triggers, monitoring and cut-offs for these locations.

15.9 Archaeology and cumulative heritage harm

- The Ardleigh area is singled out by the project itself for priority archaeological evaluation; geophysics/trenching correlate with cropmark complexes and Roman/medieval activity, underlining the high archaeological sensitivity of the corridor chosen around Ardleigh. Yet post-submission work was still incomplete at ES stage, leaving risk of avoidable loss or sub-optimal design.

- Cumulative effects with other NSIPs (e.g., North Falls and Five Estuaries) and with the EACN substation magnify landscape and setting change, a point repeatedly raised by TDC and ECC Place Services and not resolved by the Applicant's cumulative assessment.

Why the ES conclusions downplay harm in Tendring

15.10 Methodological exclusions (NDHAs' setting; "harm to significance" language for built NDHAs) and heavy reliance on embedded/standard mitigation lead to systematic downgrading of effect significance in Tendring.

15.11 LoD flexibility is not transparently sensitivity-tested for the worst-case alignment in the Ardleigh cluster, despite Place Services' explicit warning that LoD could convert low to mid-level less-than-substantial harm.

15.12 Concentration and coherence of adverse change around Ardleigh are not sufficiently weighed; the Applicant largely evaluates asset-by-asset, missing the combined townscape/landscape effect on the conservation-area settlement and its setting

TDC's overall assessment of heritage effects in Tendring (summarised)

15.13 Ardleigh (Conservation Area and setting): Significant adverse (operational) due to permanent, conspicuous pylons and wire-scape around the settlement and across contributing fields/valleys. Construction: significant due to compounds/haul routes/vegetation loss and noise.

15.14 Listed buildings in the Ardleigh hinterland (e.g., Bounds Farmhouse, St Mary's, Lowe Hill House, and several Grade II farmsteads and houses): Significant less-than-substantial harm to setting when the LoD "worst-case" is considered; at minimum moderate adverse residual effects.

15.15 Scheduled cropmark(s) and NDHAs around Ardleigh: Significant construction impacts (loss, fragmentation, or erosion of contextual setting); the risk remains elevated until intrusive evaluation and design fixes are secured by enforceable requirements.

15.16 Little Bromley War Memorial and nearby listed cottages: High vulnerability to construction vibration; unacceptable harm risk without binding, site-specific NVMP and pre-/post-condition surveys.

Remedies TDC requires (DCO Requirements/Obligations limited to TDC area)

15.17 Design and siting (avoidance first)

- Re-route/underground the Ardleigh arc segment most harmful to the Conservation Area and clustered listed buildings—or, as a minimum, fix the Order Limits and remove LoD flexibility within 1 km of the Ardleigh CA boundary and the listed assets listed above. (No lateral/vertical deviation beyond the fixed design envelope; no upward pylon height tolerance.
- Heritage-led micrositing protocol for every new pylon/gantry within Tendring: require photomontages from CA gateways and principal listed assets and stakeholder sign-off (TDC/Place Services/Historic England) before discharge of design approval.

15.18 Construction controls targeted at sensitive assets

- Asset-specific Vibration Management Plans (NVMPs) for: Little Bromley War Memorial and adjacent listed cottages; any other Tendring structures flagged by the main works contractor's detailed assessment. Secure: (i) baseline condition surveys (photographic/structural), (ii) real-time monitoring with warning/alarm/action levels, (iii) method constraints (plant selection, stand-off distances), and (iv) owner hotline & stop-work protocol.
- Protected lanes and historic hedgerows: secure measured survey, method statements and like-for-like reinstatement (species, profiles, banks, ditches) with a 10-year establishment/aftercare and replacement guarantees (not the default five years).

15.19 Archaeology and NDHAs

- Strengthen Requirement 5 (Archaeology) to require completion of priority trenching in the Ardleigh/Little Bromley corridor pre-construction, publication of results, and where high-value remains or setting receptors are identified as early as possible.

15.20 Compensation for residual harm

- Where avoidance/mitigation cannot prevent significant setting harm, secure a Tendring Heritage Compensation Package, comprising:
- Targeted undergrounding of short spans at the worst-affected Ardleigh views (if re-route is not secured); and/or

- A ring-fenced Historic Environment Fund for conservation projects in Tendring District (e.g., fabric repairs, setting enhancements, public realm in Ardleigh CA), heritage interpretation, and condition surveys, prioritised by TDC.

15.21 Monitoring, enforcement and transparency

- TDC requests a Tendring-specific Design & Heritage Compliance Plan requiring: construction photographic logs at fixed locations, a public dashboard of LoD usage (showing any in-Tendring movement/height changes), and no-deviation zones around or close to a certain distance (tbc in a DCO discharge requirement) listed buildings/CA

Conclusion

15.22 The Ardleigh arc and associated works would erode the significance of the conservation area and multiple listed buildings through conspicuous, permanent setting change, with additional risks from LoD flexibility and construction vibration (notably at Little Bromley). The ES's approach under-assesses NDHAs and combined settlement-scale effects and does not provide adequate certainty that design will be held at the least-harmful position in Tendring. TDC therefore opposes the Project as currently designed in the District and requires the package of design changes and enforceable Tendring-specific requirements set out above as the minimum necessary to make the heritage impacts acceptable

16 Hydrology, Land Drainage and Flood Risk

16.1 The Tendring District is already highly sensitive to surface water flooding, poorly draining soils, and limited drainage infrastructure across its dispersed rural settlements. Properties in Little Bromley, Ardleigh, Lawford and surrounding hamlets face well-documented issues with standing water, overland flow, and reliance on private wells and boreholes for potable water supply. TDC notes that NGET's ES identifies the area as largely Flood Zone 1 but acknowledges that several locations—particularly around Little Bromley Road and the Black Brook catchment—experience mapped high surface water flood risk during heavy rainfall.

16.2 The Council is concerned that the scale of hard surfacing introduced by the Norwich–Tilbury project in Tendring—including widened country lanes, engineered haul routes, permanent access tracks, construction compounds, and extensive hardstanding associated with the EACN—will exacerbate existing flooding patterns and create new unmanaged runoff pathways, posing material risk to homes, farmland, drainage assets, and private water supplies.

Surface Water Flooding

16.3 The ES confirms that while the majority of Tendring sits within Flood Zone 1, large areas are subjected to medium–high susceptibility to surface water flooding, particularly where soils are heavy and drainage channels are limited.

16.4 TDC has already demonstrated in its RR and we hold evidence in ECC surface water flood maps that roads such as Ardleigh Road near Jennings Farm routinely flood after rainfall, with water unable to drain for extended periods.

Agricultural Drainage Issues

16.5 Much of north-west Tendring comprises intensively farmed, clay-dominated soils that depend on shallow field drains, ditches and historic land drainage systems. These systems are already at capacity during wet periods. Any interruption, compaction, or overloading threatens direct agricultural harm and downstream flooding.

Sensitive Water Supplies

16.6 Many homes in Little Bromley and surrounding hamlets rely on private wells and groundwater-fed systems. TDC notes that the ES provides limited clarity on the protection of such supplies, beyond a general statement that contamination risk is "negligible". Given the scale of earthworks, dewatering, and potential for polluted runoff from compounds and haul roads, TDC does not consider this risk adequately assessed.

Haul Routes and Widening of Rural Roads

16.7 The project proposes the conversion of narrow, historic country lanes into construction haul routes, with widening, vegetation stripping and engineered surfaces. TDC identifies the following Tendring-specific risks:

-Increased impermeable area, raising runoff volumes and speeds.

-Loss of roadside ditches to widening works, reducing drainage capacity.

-Concentration of water on carriageways, increasing flood frequency at known hotspots such as:

- Little Bromley Road
- Bentley Road
- Ardleigh–Little Bromley corridor

-Soil compaction along verges and fields used for construction access, reducing infiltration further.

16.8 The ES states that Surface Water Management Plans will later be prepared by contractors, but provides no location-specific mitigation for Tendring, nor modelling of increased runoff arising from haul road hard surfacing.

16.9 TDC's position is that these are all unresolved issues.

EACN Substation and Associated Compounds

16.10 The proposed EACN brings the largest concentration of new impermeable infrastructure anywhere along the project route directly into the Tendring peninsula.

16.11 Key impacts:

- Large continuous hardstanding (AIS substation, compounds, parking, access tracks) significantly altering local hydrology.
- Increased runoff rates into receiving ditches and watercourses whose capacity is unproven.
- Potential downstream effects on the Black Brook, Salary Brook and Stour tributaries, which the ES identifies as already hydrologically constrained or "heavily modified".

- No clear demonstration within the ES of how surface water flows from the EACN site will be attenuated to greenfield runoff rates, nor how exceedance flows will be safely routed to avoid settlements such as Ardleigh and Little Bromley.

16.12 Given this is the single largest new impermeable footprint across the entire 180 km project, TDC considers the lack of site-specific drainage detail a significant deficiency.

Cable Corridor, Trenching and Dewatering

16.13 The ES assumes "short-term" dewatering discharges to ground, but Tendring's shallow groundwater and clay soils heighten the risk that:

- Dewatered silt-laden water could migrate horizontally towards private wells.
- Dewatering could temporarily depress groundwater, affecting well recharge.
- Spoil heaps and exposed subsoils could create turbid runoff entering drains and ditches.

16.14 The ES does not identify specific Tendring properties reliant on private water supplies, nor assess their sensitivity to contamination or turbidity changes

Construction Compounds in High-Risk Areas

16.15 The ES confirms that the Bradley Hall cable compound (JC-CC05), south of Little Bromley Road, lies partly within an area of high surface water flood risk.

16.16 TDC's concerns and the specific impacts are:

- Increased flood hazard during rainfall events as large impermeable temporary surfaces divert water into neighbouring farmland and dwellings.
- No evidence of local storage, onsite attenuation, or safe exceedance pathways.
- Risk of contaminated runoff entering drainage ditches used for agricultural water usage.

Cumulative Effects in Tendring

16.17 If this project receives a DCO, Tendring will host the highest concentration of NSIP infrastructure anywhere on the Norwich–Tilbury route.

16.18 Cumulative hydrological impacts will arise from:

- EACN Substation
- Two offshore windfarm substations (North Falls, Five Estuaries)
- Tarchon Interconnector (future)
- Associated cable corridors
- Expanded pylon network
- Multiple haul routes

16.19 The combined area of new hard surfacing is unprecedented for a rural district of this character. The ES does not assess cumulative hydrological effects for Tendring in a meaningful way, despite TDC raising this repeatedly during consultation and in the SoCG.

16.20 TDC is concerned that the overall scale of impermeable infrastructure will:

- Increase peak overland flows into the Black Brook and Stour catchments
- Reduce natural infiltration
- Heighten flood risk for Tendring settlement already experiencing surface water flooding
- Impact on already fragile existing agricultural drainage networks
- Increase turbidity and nutrient loads in receiving waters

Deficiencies in the Applicant's Assessment

16.21 TDC identifies several gaps:

1. There appears to be no Tendring-specific hydrological modelling of runoff from all the haul routes, widened roads, or compounds proposed in TDC areas.
2. There appears to be no assessment of impacts on private wells or groundwater-dependent properties in Little Bromley.
3. No clear and enforceable mitigation strategy for known flooding hotspots.
4. Reliance on future contractor-led Surface Water Management Plans leaves risks unaddressed at DCO stage.
5. Cumulative hydrological impacts remain unquantified despite multiple clustered NSIPs.

16.22 TDC therefore cannot fully rely on the ES Chapter 12 which concludes that hydrology and flood risk effects in Tendring will be "negligible".

Conclusion

16.23 TDC's view, based on local evidence and ES analysis, is that:

- The project will potentially increase flood risk in a district already struggling with surface water issues.
- The proposed infrastructure, especially the EACN, represents a major hydrological intervention lacking adequate mitigation.
- The scale of hard surfacing tied to haul routes and road widening poses a threat to agricultural land drainage and property resilience.
- Properties dependent on private wells face unassessed contamination risk.
- Without robust modelling and committed design-stage mitigation, the effects on Tendring will be severe, long-lasting and disproportionate.

16.24 TDC therefore requests that the Examining Authority:

1. Require full, location-specific hydrological modelling for Tendring, including runoff, exceedance flows, and ditch catchment capacity.
2. Require a dedicated Tendring Surface Water and Drainage Mitigation Strategy prior to consent, not deferred to post-consent contractors.
3. Require explicit protection measures for private wells and groundwater-dependent properties.
4. Require cumulative hydrological assessment incorporating all NSIPs concentrated in the Ardleigh–Little Bromley–Lawford area.

16.25 As a result, the N2T project could potentially introduce new hydrological issues into one of the most rural and drainage-sensitive districts of Essex. On the evidence presented, TDC concludes that the applicant has not satisfactorily demonstrated that the development will avoid worsening surface water flooding, agricultural drainage impacts, or risks to private water supplies in Tendring.

16.26 TDC therefore maintains that, without significant revision, robust mitigation, and detailed assessment, the project will cause unacceptable hydrological and flood risk impacts on the Tendring district.

17 Community Benefits and Compensation

17.1 TDC acknowledges that *compensation lies outside the formal scope of the DCO process*, but the Council position is that no level of compensation could ever fully mitigate the scale, concentration and duration of harm that this project will impose on the area. Tendring is being asked to host the largest and most intensive cluster of energy infrastructure in the region's history, yet the communities most affected—Ardleigh, Little Bromley, Lawford and surrounding rural parishes—have not been offered any meaningful, defined or secured community benefit package. Despite Government statements on the need for long-term support for host communities, National Grid has provided no tangible offer, no delivery framework, and no mechanism that guarantees benefits will flow to Tendring's residents or businesses.

17.2 Given this absence of any binding, locally targeted, and legally enforceable commitments, TDC's position is that no weight can be given to any claims of community benefits at this stage. The Council is deeply concerned that, without firm obligations, the communities bearing the greatest disruption, environmental impact, economic risk and landscape harm will receive no meaningful legacy in return. Until NGET brings forward a clear, specific, and secured community benefit and compensation package proportionate to the unprecedented burden placed on Tendring, there is no certainty and therefore no material value that can be attributed to community benefit proposals within the Examination.

18 Socio-economics, Leisure and Tourism

18.1 Tendring District's economy is uniquely vulnerable to the Norwich–Tilbury project. Tourism, leisure and recreation form a critically important part of the district's identity and economic base, supporting thousands of jobs and underpinning the "Sunshine Coast" visitor offer. NGET's own ES acknowledges extensive recreational assets, PRoWs, visitor accommodation and tourism-related businesses within Tendring that will experience access constraints, temporary closures, construction-related disturbance, and—in some locations—significant adverse residual effects, including permanent loss of recreational sites and disruption to established leisure uses. TDC's SoCG confirms that many of these impacts remain unresolved and that NGET has not provided adequate or district-specific mitigation proposals.

18.2 The scale, duration and intensity of construction—particularly around Ardleigh, Little Bromley, Manningtree and Lawford—will impose severe pressure on the rural road network that visitors, tourism businesses, event organisers and general businesses rely on. Reduced accessibility, construction traffic, noise, visual intrusion and the displacement of visitor accommodation by the temporary workforce all present real risks of reduced visitor numbers, disrupted events, and reputational damage to Tendring's tourism sector. As highlighted in TDC's recent RR, the Council remains concerned that the N2T project will undermine core elements of Tendring's rural and visitor economy at precisely the time when the district is working to strengthen economic resilience and narrow entrenched deprivation gaps.

18.3 Given the weight of evidence, TDC considers that the project will have significant negative socio-economic, leisure and tourism impact on the district—impacts which have not been adequately avoided, minimised or compensated for as already previously set out, and therefore need no repeating here. The ExA is therefore urged to give substantial weight to these local harms when assessing the overall planning balance.

19 Traffic and Transport

19.1 The cumulative pattern across PAR30, PAR31, PAR32 and PAR33 as demonstrated in the table below shows that the Ardleigh–Little Bromley–Manningtree/Lawford area—characterised by narrow rural lanes with residential frontages—is the district's most acutely affected network segment. As shown in NGET's Figure 16.1, these links collectively funnel construction traffic towards the EACN and associated works within Tendring, routing very high volumes of HGV and general construction traffic through sensitive, lightly engineered rural corridors, and feeding directly into constrained A- and B-class roads (A120/A137/A133).

Table: Summary of Severe Traffic Uplifts on PAR30 and Adjacent or other nearby feeder roads/PARs

Route (PAR Link)	Location and (current) Description	% Increase – Total Vehicles (12-Hour Peak)	% Increase – HGVs (12 Hour Peak)
PAR30 – Bentley Road	Rural lane extending in a southeastern direction from Little Bromley – it is a lane with regular residential properties/frontages	**342%** (NDC Site 8 – unclear from submission the precise location) **193%** (Site Bell 54a - unclear from submission the precise location)	**1,090%** (NDC Site 8) **3,282%** (Site Bell 54a)
PAR31 – Ardleigh Road / Little Bromley Road	Narrow rural lanes acting as feeders to Bentley Road	**1,193%**	**3,807%**
PAR33 – Old Ipswich Road	Connection (A) road running mostly parallel with A12 and connecting settlements with the A120/A120 and businesses and industries in the area	Up to **75%** increase	Up to **252%** increase
PAR32 – Wick Lane	Minor (and narrow) rural lane with passing places and poor forward visibility due to mature hedgerows either side (and hard up against lane edge)	**15%**	**507%**

19.2 In terms of Peak build-up and impact on residential amenity, the respective tables in Appendix 16.4 show a progressive ramp-up of daily trips to a defined peak "busy week" on PAR30 (Image A16.4.30) before tapering, coinciding with multiple construction activities and HGV-intensive phases; at the same time. Adjacent Tendring links (Images A16.4.31–A16.4.34) show overlapping peaks, compounding the total flows through exactly the same residential and rural dominated areas. These corridors contain a high number of dwellings fronting the highway, limited footways, and equestrian/cyclist activity; under IEMA criteria, the resulting severance, amenity loss, fear/intimidation and delay for non-motorised users (the most vulnerable of road users) will be material, and driver/public transport delay will be unavoidable at the peak even before abnormal loads are considered. TDC's speech to the ExA at the OFH on 12 Feb 2026 also highlighted that existing narrow, flood-prone rural lanes will be pushed "beyond breaking point" without robust, front-loaded and enforceable mitigation, risking access for residents and local businesses throughout the build-up to peak activity.

19.3 In terms of unknowns and insufficiency of mitigation, while an Outline CTMP/PRoW Plan is referenced, key operational controls remain undefined at this stage, for example:

(i) finalised routing and phasing at link-level,
(ii) binding caps on 'in-combination' daily movements across PAR30/PAR31/PAR33 (accounting for *all* NSIPs/schemes),
(iii) committed, pre-construction physical upgrades (carriageway widening/edge strengthening, drainage and culverts, walking/horse-rider protection), and
(iv) enforceable residential-amenity protections (quiet hours, night-time AIL strategy, continuous access management for frontagers).

19.4 The ES itself acknowledges assumptions, data limitations and reliance on professional judgement; it also takes a road-only logistics scenario for the main assessment—leaving some uncertainty around actual HGV volumes through Tendring's rural network during the busiest phases. Even on the Applicant's figures, IEMA "Rule 1/Rule 2" thresholds are greatly exceeded on PAR30 and adjacent links, and cumulative peaks will be experienced on roads with residential frontages (contrary to policy aims to avoid severe *residual* cumulative impacts).

Conclusion

19.5 Having regard to the ES evidence on PAR30 and surrounding A/B-routes, the ECC single response, TDC's RR and SoCG, and TDC's oral evidence, the Council considers that residual cumulative traffic and transport impacts in Tendring are severe to extremely severe, particularly residential amenity harm (noise, vibration, access), network operation (delay, safety at constrained junctions and frontages), and vulnerability of non-motorised users. Proposed mitigation is neither sufficiently defined nor capable of reducing effects to an acceptable level on this rural network. Prevention remains the only reliable mitigation: the EACN should not be sited here, given the scale of 'in-combination' vehicular movements required and the evident constraints of Tendring's lanes and settlements. Regardless of any EACN relocation proposals, no DCO should be granted without legally-secured, route-specific movement caps (including all NSIPs), front-loaded physical highway upgrades delivered before peak flows, and enforceable residential-amenity protections—but even with such measures, significant adverse local effects would remain in Tendring.

20 General Landscape Implications, Impact on Trees, Ecology and Biodiversity

20.1 TDC maintains that the landscape harm arising from the Norwich–Tilbury project is severe to very severe, particularly across Ardleigh, Little Bromley, and the wider Tendring plateau-edge landscapes. The ES confirms that these areas (e.g., LCA 7A Bromley Heaths and LCA 6B Ardleigh Valley System) would experience moderate–major and significant adverse effects within 0.5 km, reducing only to *moderate but still significant* within 1.5 km.

20.2 TDC's position is that these outcomes significantly understate the scale of harm because:

- The density and repetition of 50–57 m pylons in very close proximity to the northern boundary and setting of the Dedham Vale National Landscape fundamentally alters the open rural character of the area.
- The recently updated ES acknowledges that Dedham Vale's *special qualities*—including "iconic views," "tranquillity," and "long-distance valley views"—would experience major and significant adverse effects during construction.
- Given the *topographic openness* of the Tendring plateau and long-sweeping valley sides, the resulting wirescape would be unavoidable, unmitigable, and permanently intrusive.

20.3 TDC therefore concludes that no amount of mitigation can offset or meaningfully reduce the scale of landscape harm, particularly given the project's reliance on multiple parallel linear infrastructures compressed into a narrow zone north of the National Landscape.

Impacts on the National Landscape (Dedham Vale) and Its Setting

20.4 The ES confirms that Dedham Vale's valley floor and ridge edges are highly sensitive and that the project would cause:

- Major/significant construction effects on "iconic valley views" and "tranquillity."
- Moderate/significant effects on the valley meadowlands and riverine features.

20.5 TDC emphasises that the setting of the National Landscape extends well beyond the statutory boundary. In Tendring, the northern plateau edge above the River Stour is integral to:

- the perception of a wide, rural, tranquil panorama,
- Constable-country associations,
- and the visual envelope experienced from key PROWs and recreational routes.

20.6 The proposed concentration of pylons and supporting infrastructure in this location would:

- introduce strong vertical and repetitive engineered lines,
- erode the visual quietness and aesthetic simplicity essential to the National Landscape's special qualities, and
- generate permanent discordant elements in cross-valley views.

20.7 Given National Policy Statement EN-1 and NPS EN-5, TDC's position is that the project fails to demonstrate that overhead lines close to a nationally designated landscape and its setting are justified, nor does the application provide compelling evidence that undergrounding or alternative strategic options have been adequately considered or correctly informed by accurate baseline data.

Trees and Hedgerows

20.8 TDC's RR identifies numerous omitted Tree Preservation Orders (TPOs) and misidentified or missing veteran/ancient trees and hedgerows within the Order Limits and adjacent corridors. NGET has admitted in engagement meetings that tree surveys were predominantly undertaken remotely, with only partial ground-surveys.

20.9 This is a critical flaw because:

- Tree constraints directly determine micro-routing,
- Haul road alignment,
- Locations of temporary access points,
- Positioning of trenchless crossings,
- And the extent of vegetation loss and canopy fragmentation.

20.10 The ES states that tree/hedgerow removal and management are major sources of construction effects and confirms significant adverse effects for all LCAs where vegetation loss occurs. Yet if the baseline data is inaccurate, then:

- the route selection process relied on faulty or incomplete arboricultural constraints,
- the LVIA conclusions underestimate harm,
- and the mitigation hierarchy (avoid–reduce–mitigate) was not properly applied.

20.11 Accordingly, TDC argues NGET must return to first principles, repeat full arboricultural surveys on-site, and re-run route selection and design development using accurate, verified constraints mapping.

20.12 The ES commits to a **3:1 replacement ratio** for tree losses. However:

- Replacement planting does not compensate for the loss of mature/veteran trees, nor does it replicate hedgerow assemblages with ecological and historic value.
- Replacement planting along overhead line corridors is restricted and often displaced off-site.
- The ES itself acknowledges that significant landscape effects persist even by Year 15, with overhead line impacts remaining fully visible despite maturing planting.

20.13 TDC therefore considers the proposed arboricultural mitigation wholly inadequate and incapable of addressing the real magnitude of impact.

Ecology and Biodiversity Implications

20.14 While Chapter 8 of the ES covers ecology, the landscape chapter cross-references key interdependencies:

- Ancient/priority hedgerows,
- Semi-natural woodland remnants,
- Veteran trees,
- Linear habitats that function as ecological corridors.

20.15 TDC notes that the failure to properly identify trees and hedgerow assets has direct consequences for biodiversity impact assessment. Baseline errors undermine the calculation of:

- habitat loss,

- functional ecological connectivity,
- seasonal/sheltering habitat impacts,
- bird/bat collision risk modelling,
- and BNG calculations.

BNG Local Delivery

20.16 TDC strongly maintains that BNG must be delivered locally, in a proportionate and fair way having regard to the project length, equivalent and proportionate to the landscapes experiencing the harm:

- to ensure ecological continuity,
- to support the resilience of existing habitat networks,
- and to address landscape-scale impacts on the Stour Valley and Tendring plateau.

20.17 Off-site or remote BNG delivery would not address the actual ecological fragmentation caused by the scheme in Tendring.

Policy Context and Compliance Failures

20.18 Referencing NPS EN-1 and EN-5, the following grounds are central to TDC's position:

- EN-1 sections 5.10.16–5.10.25 require accurate baseline data, full identification of sensitive landscapes, and demonstrably minimised negative effects.
- EN-5 section 2.11.5 states the presumption is to avoid overhead lines in nationally designated landscapes and consider their setting.
- EN-5 section 2.9.24 requires proper evaluation of alternatives including undergrounding where adverse impacts are high.

20.19 Given the severe to very severe harm, the incorrect baseline tree data, the misidentification/omission of TPOs, and the underrepresentation of setting impacts to the National Landscape, TDC concludes the application fails to comply with the landscape requirements of EN-1 and EN-5 and indeed relevant local plan policies as set out in Appendices 1-19.

Conclusion

20.20 In conclusion, TDC's position is that:

- The landscape harm is severe, very severe, and permanent, particularly around Ardleigh, Little Bromley, and the northern approach to the Dedham Vale National Landscape.
- The setting of the National Landscape is materially harmed, contrary to national policy.
- The LVIA is undermined by significant baseline inaccuracies relating to trees, hedgerows, and arboricultural features.

- Mitigation cannot address the scale or nature of the harm.
- BNG must be delivered locally and cannot offset losses at landscape scale if delivered elsewhere.

20.21 TDC therefore requests that NGET revisit its evidence base, correct its baseline data, re-run its route appraisal, and return with a fundamentally revised proposal that reflects accurate environmental information and meets the expectations of national policy.

21 Skills and Employment

21.1 At the time of writing this LIR there is no legally-binding, tangible package from the Applicant that would guarantee local skills, employment or supply-chain benefits for Tendring residents or businesses. In the absence of enforceable DCO obligations (requirements/obligations secured through the dDCO or a binding agreement), no material weight can be afforded to the Applicant's claimed socio-economic "benefits." Tendring is among the most deprived parts of the country and without binding commitments there is no assurance that our communities will benefit at all, let alone proportionately to the scale of harm. (See TDC's speech content for the Preliminary Meetings, setting out this stance and asks for a legally enforceable Skills, Training and Employment Strategy.)

21.2 NGET communications for the Great Grid Upgrade (including pieces that name Norwich to Tilbury alongside other East Anglia schemes) make reference to 'promotional outreach', including school workshops, skills fairs, and "inspiration" activities. These are non-contractual and not certified DCO deliverables for N2T, and therefore cannot be relied upon for decision-making weight in Tendring's context

21.3 Whilst TDC clearly acknowledges the national need for the Great Grid Upgrade; any claimed skills and employment benefits must be secured to be afforded weight. At present:

- No certified Skills, Training and Employment Strategy is before the Examination for N2T with quantified and or measureable targets (e.g., local apprenticeships, NEET engagement, accredited training places, wage floors, or local labour-percentage targets) and monitoring/enforcement via DCO requirement.
- No local supply-chain framework exists that mandates minimum local procurement values/percentages, transparent reporting, or penalties for non-delivery.

What TDC Requires (to reconsider its position on Skills and Employment)

21.4 Until the Applicant tables a legally binding package—secured by Requirement(s) and/or a signed agreement—to deliver measurable, locally-focussed benefits for the district of Tendring as one of the most severely affected districts, no weight can be given to any claimed employment/skills outcomes or benefits. As a minimum, TDC seeks a certified plan that includes:

1. Local Apprenticeships & Traineeships: time-bound, numbered places (including priority for NEETs and disadvantaged groups), tied to construction phases and contractors, with audited outputs.
2. Local Labour & Procurement: percentage targets and £ value for Tendring-based SMEs and VCSEs, broken down by package, with quarterly publication and independent verification.
3. Education & Provider Partnerships: binding arrangements (e.g., with Colchester Institute, schools/FE providers) that deliver accredited pre-employment training, site-ready cards and guaranteed interviews, again quantified and reported.
4. Monitoring & Enforcement: a DCO Requirement (and/or S.106-style obligation) with KPIs, baselines, milestones, and sanctions/withholds for non-performance. (The Examination Library currently contains no such secured mechanism for N2T.)

Conclusion

21.5 Given the absence of any secured, enforceable skills/employment offer for Tendring within the submitted N2T application, TDC's position is that no weight is afforded to unquantified and non-binding claims of socio-economic benefit. TDC's position will remain unchanged unless and until the Applicant proposes and secures legally binding, monitored and reportable commitments that ensure real, local uplift in skills, employment and supply-chain participation for Tendring's communities.

22 Development Consent Order

22.1 TDC supports and adopts the comments and recommendations made by ECC on the Draft Development Consent Order, as set out in their Local Impact Report. As these matters are fully addressed by ECC, TDC does not repeat them here but respectfully requests that the ExA consider ECC's submissions and the reasons provided therein, as they are directly relevant to the district of Tendring.

23 Statement of Common Ground

23.1 TDC's updated SoCG with NGET will be submitted at Deadline 1. This updated SoCG reflects the Council's most recent position and aligns closely with the issues, concerns and outstanding matters set out within this Local Impact Report (LIR). It will therefore provide a structured summary of areas that are agreed, not agreed, or remain under discussion between the parties, ensuring transparency for the Examining Authority.

23.2 The SoCG should be read alongside this LIR, as the majority of themes and unresolved issues documented here are mirrored in the draft SoCG, and underscore the significant number of matters where further clarification, evidence or meaningful engagement from the Applicant is still required.

24 Overall Conclusion

24.1 TDC maintains that the Norwich to Tilbury proposal, as currently submitted, gives rise to significant, wide-ranging, and unresolved harms across landscape, environment, highways, socio-economics, community wellbeing and the setting of the Dedham Vale National Landscape, with many of these impacts assessed as major and significant in the Environmental Statement. Despite constructive engagement throughout the pre-application and examination stages, key concerns remain unaddressed, including the lack of meaningful skills and employment commitments, the absence of robust mitigation for severe landscape and ecological harm, and insufficient assurances regarding construction impacts on rural communities and local businesses.

24.2 TDC has approached this process transparently and collaboratively, yet the Council has received no substantive response to many of its technical requests and drafting comments on the DCO, and critical issues raised in good faith remain outstanding. Until the Applicant provides clear, enforceable commitments and demonstrates that the project can proceed without causing disproportionate and irreversible harm to Tendring's communities, environment, and economy, TDC cannot support the scheme.

24.3 The Council will continue to participate fully in the Examination and will provide further detailed submissions at the relevant deadlines. However, based on the evidence currently before the authority, TDC's position remains firm: as drafted, the project does not adequately protect Tendring, nor does it deliver the balanced outcomes required by national policy or expected by our communities.

END

Appendix – 1

1 Presumption in Favour of Sustainable Development

1.1 Presumption in Favour of Sustainable Development

1.1.1 The authorities will apply a presumption in favour of sustainable development in accordance with guidance in the National Planning Policy Framework.

Policy SP 1
PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
When considering development proposals the Local Planning Authorities will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. They will always work pro-actively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Development that complies with the Plan will be approved without delay, unless material considerations indicate otherwise.

1.1.2 A Habitats Regulations Assessment (HRA) was completed for Section 1 of the Plan. The loss of off-site habitat, water quality and increased recreational disturbance were identified as issues with the potential to result in likely significant effects on European Sites, without mitigation to address the effects.

1.1.3 The Appropriate Assessment (AA) identified a number of avoidance and mitigation measures to be implemented, to ensure that development proposals in the Plan will not result in adverse effects on the integrity of any Special Area of Conservation, Special Protection Area or Ramsar site, and are HRA compliant.

1.1.4 To mitigate for the loss of off-site habitat, the AA identified the need for wintering bird surveys for the Tendring/Colchester Borders Garden Community as part of any project level development proposals and masterplanning (see also paragraph 8.3 and Policy SP8 paragraph F.20).

1.1.5 To protect water quality, the AA recommended the inclusion of policy safeguards to ensure that adequate water and waste water treatment capacity or infrastructure upgrades are in place prior to development proceeding.

1.1.6 Recreation activities can potentially harm Habitats Sites. The AA identified disturbance of water birds from people and dogs, and impacts from water sports/watercraft as the key recreational threats to Habitats Sites.

1.1.7 To mitigate for any increases in recreational disturbance at Habitats Sites, the AA identified the need for a mitigation strategy. Natural England's West Anglian Team identified the Essex coast as a priority for a strategic and proactive planning approach as it is rich and diverse ecologically, and many of the coastal habitats are designated as Habitats Sites. Consequently, 12 local planning authorities in Essex have prepared an Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS).

1.1.8 The Essex Coast RAMS sets out specific avoidance and mitigation measures by which disturbance from increased recreation can be avoided and mitigated thus enabling the delivery of growth without adversely affecting Habitats sites.These measures are deliverable, realistic, underpinned by robust up to date evidence, precautionary and provide certainty for developers around deliverability and contributions. The Essex Coast RAMS Strategy Document was completed in 2019 and is supported by an SPD.

Policy SP 2

Recreational disturbance Avoidance and Mitigation Strategy (RAMS)

Contributions will be secured from development towards mitigation measures in accordance with the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy 2018-2038 (RAMS).

Appendix – 2

2 Infrastructure and Connectivity

2.0.1 A coordinated and integrated approach to infrastructure planning and delivery is required to implement the vision for North Essex. Provision of appropriate and timely infrastructure to support growth will be central to the area's continuing prosperity, attractiveness and sustainability. Section 1 of the Local Plan highlights strategic and cross-boundary infrastructure, identifying the strategic transport infrastructure projects required to underpin delivery of the planned growth in the area including the proposed Garden Community, and sets priorities for other infrastructure requirements such as education, healthcare, digital connectivity, water supply and wastewater infrastructure and treatment. Section 2 of the Local Plan contains the infrastructure requirements for allocations made in that section of the plan. The Infrastructure Delivery Plan (IDP) provides the phasing and costing of infrastructure requirements for the Garden Communities and the Section 2 allocations required within the plan period. The infrastructure planning process will include the identification of funding sources and may include using appropriate mechanisms of shared public sector delivery financing mechanisms and the implementation of a strategic infrastructure tariff or other suitable mechanisms to apply across North Essex.

2.1 A Garden Community

2.1.1 The challenge in the Garden Community will be to create a community in which people move around in a different way to most of the existing towns in North Essex . Networks need to give priority to people for short everyday trips to link people to work, education, retail, leisure, creating an independent safe environment.

2.1.2 The new garden community will seek to manage travel demand, providing retailing, jobs, services and facilities within the site to help reduce the need to travel, and integrate and connect with the rest of North Essex and beyond through transport infrastructure and measures that promote sustainable travel patterns and reduce adverse impacts on the highway network. The North Essex Garden Communities Charter seeks to ensure that land use planning of the new community maximises the provision and use of sustainable transport internally and connects externally to key urban centres. Given the Charter's commitment to the timely delivery of infrastructure, policies SP8-9 will ensure that key transport projects align with housing and employment delivery.

2.1.3 To maximise the use of public transport new forms of high quality rapid transit networks will be provided to serve existing urban centres such as Colchester; key destinations such as the University of Essex; and key transport interchanges in North Essex. To achieve the desired step change in sustainable transport, policy will require that this infrastructure will be funded and its delivery phased to align with the development phases.

2.2 B Transportation and Travel

2.2.1 North Essex is well placed in the context of connections by road, rail, air and sea to the wider region and beyond, and these connections will need to be strengthened as part of developing sustainable transport networks**.**

2.2.2 The challenge is to provide North Essex with a sustainable transport system that provides good access to jobs and services, to support economic growth. Growth promoted

through the new Local Plans, particularly via large scale new developments where delivery will extend beyond the plan period, provides an opportunity to prioritise, facilitate and deliver larger scale transport infrastructure projects that can significantly improve connectivity across and within the area. A focus on sustainable transport in and around urban areas and the Garden Community will positively alter travel patterns and behaviour to reduce reliance on the private car.

2.2.3 The Local Plans seek to improve transport infrastructure to enable the efficient movement of people, goods and ensure that new development is accessible by sustainable forms of transport. Measures designed to encourage people to make sustainable travel choices such as better public transport provision, car clubs, electric vehicle charging points and provision of cycle links and foot ways will also be required to achieve such a change. It will also help to enhance air quality and improve health and well-being.

2.2.4 Braintree, Colchester and Tendring will continue to work closely with government departments, Highways England, Essex County Council, Network Rail, rail and bus operators, developers and other partners to better integrate all forms of transport and improve roads and public transport and to promote cycling and walking. Key projects during the plan period will see improvements to the A12, A120, Great Eastern Main Line including rail services, and provision of rapid transit connections in the Garden Community and the adjacent urban areas. An integrated and sustainable transport system will be delivered that supports economic growth and helps deliver the best quality of life.

2.2.5 The Inter-Urban Road Network

2.2.5.1 The A12 is set to have major improvements as part of the Government's Roads Investment Strategy (RIS1 and RIS), with the aim of improving capacity and relieving congestion. The A12 is being widened between junction 19 (Chelmsford) and junction 25 (A120 interchange) to increase safety, improve journey time reliability, provide a benefit to the local road network, and in doing so support long term sustainable growth. Highways England (HE) has announced its preferred route between junction 19 and 23 (October 2019) and between junction 23 and 25 in August 2020.The A12 J19 to J25 widening scheme will go ahead as part of the Road Investment Strategy 2 (RIS2) programme, and is now a fully funded scheme. It is expected the route will be open for traffic in 2027 – 2028. RIS2 stated that the A12 scheme will need to take account of the evolving proposals for the A120 Braintree to A12 improvements, and any potential future road link to the improvements for the A120 will be incorporated into the A12 scheme.

2.2.5.2 The A120 is a key east-west corridor across Essex providing access to London Stansted Airport in the west to the Harwich ports in the east and serving the economies of Braintree, Colchester and Tendring, with links to Chelmsford via the A130.

2.2.5.3 Consultation on A120 route improvement options between Braintree and the A12 ended in March 2017. ECC has identified a favoured route which has been recommended to Highways England and the Department of Transport for inclusion in Road Investment Strategy 2 (RIS2), which is the next funding period for the strategic road network and will run from 2020 to 2025. In addition a series of short term interventions will be delivered along the route to improve safety and relieve congestion. The A120 from the A12 to Harwich is subject to a Highways England Route Based Strategy and improvements to this section of road are expected over the plan period. ECC and Highways England have progressed work with regards a new and improved A120 between Braintree and the A12. The new A120 is necessary to help address the volume of existing A120 movements which by far exceeds the current standard of carriageway provision. The route will be instrumental in catering for growth in the corridor and will provide a better route for freight traffic, improve safety and relieve existing

communities from a range of externalities such as through traffic, noise, severance and poor air quality. ECC has identified its favoured Route D which would join the A12 south of Kelvedon. In March 2020 the government announced its Road Investment Strategy (RIS2) which included a commitment to progressing further development work on the A120 dualling to prepare the scheme for delivery. The A120 dualling scheme will be considered for inclusion in the RIS3 programme (2025 – 2030) and is now considered a pipeline project to be progressed by Highways England.

2.2.6 Rail

2.2.6.1 The Anglia Route Study prepared by Network Rail (March 2016) shows that while capacity varies along the Great Eastern Main Line, capacity to accommodate growth is limited and is particularly constrained in peak times from Chelmsford to London. Improvements are required along the line to accommodate growth and provide a faster more competitive service across the region.

2.2.6.2 The Study identifies a package of improvements necessary to respond to the need for increased capacity, which are seen as priorities to enable growth, improve services and journey reliability.

2.2.6.3 A franchise was awarded to Greater Anglia for passenger services in the region which commenced in 2018 followed by the replacement of the entire fleet of trains to add capacity.

2.2.7 Public Transport, Walking and Cycling

2.2.7.1 Alternative forms of transport to the private car (public transport, walking, and cycling) to travel to work and other trips are essential in managing congestion and to accommodate sustainable growth. The levels of growth proposed in the Local Plans will require that the consequent need to travel is managed. Travel planning and smarter choices initiatives will be promoted to ensure that all residents have good access to local jobs, services and facilities, preferably by either walking or cycling. For longer trips and in rural areas where there are fewer local services and employment opportunities, public transport will be promoted.

2.2.7.2 Essex County Council prioritises passenger transport (bus, minibus, taxi and community transport) according to the 'Getting Around in Essex Strategy'. The County Council will work in partnership with stakeholders to improve bus services and their supporting infrastructure to provide a real alternative to the private car. This will be achieved by identifying opportunities for a better bus network (routes, frequency, community-based services); integrating school and commercial bus networks; the implementation of travel planning (work, business, school and health); provision of digital information measures; provision of park and ride; and supporting the growth in key commuter and inter urban routes. Conventional local bus services, and in particular improving existing services, will be an important part of promoting sustainable travel across North Essex, and will complement the new high quality rapid transit network.

2.2.7.3 Through implementation of the Essex Cycling Strategy (2016), Cycling Action Plans have been prepared in all the NEAs to increase cycle levels; identify safety issues; identify gaps on key routes; identify ways of closing gaps; and create better cycle connectivity to key employment areas, development zones and schools. The provision of continuous cycle routes and a coherent cycle network will encourage people to make short trips by bicycle rather than by car.

2.2.8 Policies and Delivery Mechanisms for Sustainable Transport

2.2.8.1 Creating development that is accessible by different modes of transport, especially walking and cycling and the use of public transport is essential to promoting sustainable development as it

reduces car dependency. An important policy tool to achieve this is a people orientated transport hierarchy i.e. prioritising walking and providing access for people with mobility impairment; cycling; public transport; cars (for occupiers on site and visitors); powered two wheelers; and commercial vehicles). The modal hierarchy will be used to ensure that if not all modes can be satisfactorily accommodated, those towards the top of the hierarchy are considered first and given greater priority.

2.2.8.2 Sustainable transport management will be based on promoting modes which minimise environmental impact and promote social inclusion. It is important that developments are well located in relation to existing walking, cycling and public transport networks, and where appropriate provide enhanced facilities, as this will ensure that there is the maximum potential to use these modes as attractive alternatives to cars.

2.3 C Social Infrastructure

2.3.1 Education

2.3.1.1 New development must provide for the educational needs of new communities, and this is set out in more detail within the Infrastructure Delivery Plan. This will involve the expansion of existing schools where feasible and the construction of new schools, together with provision for special educational needs, early years and childcare places. Education requirements will need to be based on a strong understanding of future pupil numbers, with co-operation between county, district and borough councils. A range of educational opportunities will need to be addressed as part of a sustainable growth strategy, including practical vocational training, apprenticeships, and further and higher education.

2.3.1.2 New schools are an important place-making component of Garden Communities where early provision is usually critical in providing core social infrastructure to help a new community thrive, improve social integration and support the creation of sustainable travel patterns and a healthy environment.

2.3.2 Healthcare

2.3.2.1 Local authorities have a role in creating a healthy community. The North Essex Authorities will work closely with relevant stakeholders such as the NHS, Public Health and local health partnerships, developers and communities to ensure that future development in North Essex takes into account the need to improve health and wellbeing of local residents (and workers) including access to appropriate health and care infrastructure to support new and growing communities. Requirements are set out in more detail within the Infrastructure Delivery Plan. This will be particularly important given the ageing profile of existing and future residents. There is already a need for more and better quality health care facilities across North Essex with some areas having relatively poor access to health care facilities. The Garden Community will provide the conditions for a healthy community through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and which is accessible by walking and cycling and public transport. Support will be given to meet cross-boundary need for hospice facilities.

2.4 D Digital Connectivity

2.4.1 The NPPF indicates how high-quality communications infrastructure is essential for economic growth and social well-being The availability of high speed and reliable broadband, particularly in

rural areas, is a key factor in unlocking new development opportunities and ensuring that people can access services online and work from home. The Government is committed to making gigabit-enabling connectivity available to all premises in the UK by 2025 and the Local Plan can contribute towards achieving this goal by requiring developers to ensure such technology is in place.

2.4.2 Fast broadband connections and telecommunications are an increasingly important requirement to serve all development. New development should contribute to the creation of a comprehensive and effective network in both urban and rural areas to promote economic competitiveness and to reduce the need to travel. The priority is to secure gigabit-enabling connectivity to all existing and new developments. Developers are encouraged to engage with communication network providers at the earliest opportunity. Where provision is possible preference is indicated for open-access infrastructure, enabling multiple service providers access to end users.

2.5 E Water Supply and Wastewater

2.5.1 The authorities will need to work with Anglian Water, Affinity Water, Environment Agency and developers to ensure sufficient capacity and provision of an adequate water supply and foul drainage and wastewater treatment to support growing communities as outlined in the Integrated Water Management Strategy and Infrastructure Delivery Plan. This will be particularly important as water supplies continue to be threatened by climate change and pressures from continuing growth and development. Water provisions need to be protected and it is essential for adequate water and wastewater infrastructure to be in place to accommodate the demands of growth and development in accordance with the Water Framework Directive and the Habitats Directive. The new Garden Community has the opportunity to minimise demand and wastewater generation, through exploring opportunities at both the strategic and local level.

Policy SP 6

INFRASTRUCTURE & CONNECTIVITY

All development must be supported by the provision of the infrastructure, services and facilities that are identified to serve the needs arising from the development. The requirements in section A of this policy apply only to the Tendring / Colchester Borders Garden Community, whilst the remaining sections B, C, D and E apply to all allocations and development proposals in the North Essex Authorities area.

A. Tendring / Colchester Borders Garden Community

1. The Development Plan Document (DPD) for the Tendring / Colchester Borders Garden Community will include:

a) An infrastructure delivery strategy and phasing plan that sets out how infrastructure, services and facilities will be provided. Infrastructure delivery will align with each development phase and be supported by suitable mechanisms to deliver the infrastructure both on and off-site;

b) Details of the design and delivery of Route 1 of the rapid transit system, and a programme for the integration of the garden community into the system. The route will be designed to accommodate future route enhancements and technology improvements; and

c) Target modal shares for each transport mode and details of sustainable transport measures to support their achievement.

2. Before any planning approval is granted for development forming part of the Tendring / Colchester Borders Garden Community, the following strategic transport infrastructure must have secured planning consent and funding approval:

a) A120-A133 link road: and

b) Route 1 of the rapid transit system as defined in the North Essex Rapid Transit System: From Vision to Plan document (July 2019).

3. Sustainable transport measures will be provided from first occupation at the Tendring / Colchester Borders Garden Community to support the achievement of the target modal shares as defined in the DPD for the garden community.
4. Other strategic infrastructure requirements for the Tendring / Colchester Borders Garden Community are set out in sections D, E and F of Policy SP9, and will be further defined in the DPD for the garden community.

B. Transportation and Travel

The local planning authorities will work with government departments, Highways England, Essex County Council, Network Rail, rail and bus operators, developers and other partners to deliver the following;

- Changes in travel behaviour by applying the modal hierarchy and increasing opportunities for sustainable modes of transport that can compete effectively with private vehicles;
- A comprehensive network of segregated walking and cycling routes linking key centres of activity;
- Improved urban and inter-urban public transport, and new and innovative ways of providing public transport, including:
    - high quality rapid transit networks and connections in and around urban areas with links to the new garden community;
    - maximising the use of the local rail network to serve existing communities and locations for large-scale growth;
    - a bus network providing a high-frequency, reliable and efficient service, integrated with other transport modes serving areas of new demand;
    - promoting wider use of community transport schemes;
- Increased rail capacity, reliability and punctuality, and reduced overall journey times by rail;
- New and improved road infrastructure and strategic highway connections to reduce congestion and provide more reliable journey times along the A12, A120 and A133, specifically:
    - Improved access to and capacity of junctions on the A12 and other main roads;
    - A dualled A120 from Braintree to the A12.
- Innovative strategies for the management of private car use and parking including the promotion of car clubs and car sharing, and provision of electric car charging points.

C. Social Infrastructure

The local planning authorities will work with relevant providers and developers to facilitate the delivery of a wide range of social infrastructure required for healthy, active and inclusive communities, minimising negative health and social impacts, both in avoidance and mitigation, as far as is practicable.

Education

- Sufficient school places will be provided in the form of expanded or new primary and secondary schools together with early years and childcare facilities that are phased with new development, with larger developments setting aside land and/or contributing to the cost of delivering land for new schools where required.
- Practical vocational training, apprenticeships, and further and higher education will be provided and supported.

Health and Wellbeing

- Healthcare infrastructure will be provided as part of new developments of appropriate scale in the form of expanded or new facilities including primary and acute care; pharmacies; dental surgeries; opticians; supporting community services including hospices, treatment and counselling centres.

- Require new development to maximise its positive contribution in creating healthy communities and minimise its negative health impacts, both in avoidance and mitigation, as far as is practicable.
- The conditions for a healthy community will be provided through the pattern of development, good urban design, access to local services and facilities; green open space and safe places for active play and food growing, and which are all accessible by walking, cycling and public transport.

D. Digital Connectivity

Comprehensive digital access to support business and community activity will be delivered through the roll-out of ultrafast broadband across North Essex to secure the earliest availability of full fibre connections for all existing and new developments (residential and non-residential). All new properties will allow for the provision for ultrafast broadband in order to allow connection to that network as and when it is made available.

E. Water & Waste water

The local planning authorities will work with Anglian Water, Affinity Water, the Environment Agency and developers to ensure that there is sufficient capacity in the water supply and waste water infrastructure to serve new development. Where necessary, improvements to water infrastructure, waste water treatment and off-site drainage should be made ahead of the occupation of dwellings to ensure compliance with environmental legislation.

Appendix – 3

3 Creating Quality Places

3.1 The North Essex area has a great variety of natural environments, and wonderful towns and villages. It is critical that new development must incorporate high standards of place-making along with urban and architectural design to respect the character of these environments. Major new developments will be planned carefully with the use of masterplans and design codes where appropriate.

3.2 Networks of green and blue infrastructure should be provided across new developments, linking new developments within existing networks of open space. These areas can be multi use, providing space for natural species and habitats as well as space for informal recreation, walking, cycling and equestrian links.

3.3 This requirement for high design standards will apply across all scales of new development as well as to infrastructure projects. Enhancements to the public realm, landscaping measures and attention to architectural detail will be important features that the authorities will wish to see included in new developments. Strategic scale and more local green infrastructure can make a vital contribution to quality of place, biodiversity gains, alleviating recreational pressure, and health outcomes if properly integrated into the design and delivery of new development. The Defra biodiversity accounting metric 2.0, or future iterations of this, can be used to accurately assess habitat impacts. Sustainable Drainage Systems (SuDS) provide abundant opportunities to introduce wildflower strips and soft landscaping to a development or urban area. This not only brings an attractive feature to the area for people but acts as a wildlife corridor, connecting the rivers, ditches, hedges, verges and gardens, allowing movement of wildlife throughout an area, connecting to the wider environment and therefore greatly enhancing the biodiversity value of the site.

Policy SP 7

PLACE SHAPING PRINICPLES

All new development must meet high standards of urban and architectural design. Development frameworks, masterplans, design codes, and other design guidance documents will be prepared in consultation with stakeholders where they are needed to support this objective.

All new development should reflect the following place shaping principles, where applicable:

- Respond positively to local character and context to preserve and enhance the quality of existing places and their environs;
- Provide buildings that exhibit individual architectural quality within well-considered public and private realms;
- Protect and enhance assets of historical or natural value;
- Incorporate biodiversity creation and enhancement measures;
- Create well-connected places that prioritise the needs of pedestrians, cyclists and public transport services above use of the private car;
- Provide a mix of land uses, services and densities with well-defined public and private spaces to create sustainable well-designed neighbourhoods;
- Enhance the public realm through additional landscaping, street furniture and other distinctive features that help to create a sense of place;
- Provide streets and spaces that are overlooked and active and promote inclusive access;
- Include parking facilities that are well integrated as part of the overall design and are adaptable if levels of private car ownership fall;

- Provide an integrated and connected network of biodiverse public open space and green and blue infrastructure, thereby helping to alleviate recreational pressure on designated sites;
- Include measures to promote environmental sustainability including addressing energy and water efficiency, and provision of appropriate water and wastewater and flood mitigation measures including the use of open space to provide flora and fauna rich sustainable drainage solutions; and
- Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light, overbearing and overlooking.

Appendix – 4

4 Settlement Development Boundaries

4.1 To achieve a sustainable increase in housing stock, a significant number of new homes will come forward on sites which at April 2020 already had extant planning permission for new housing. The remaining requirement will be delivered on sites that are specifically allocated for housing or mixed-use development, supplemented by other suitable sites within the Settlement Development Boundaries in this Local Plan. Alongside the planned developments, it is likely that a number of currently unidentified 'windfall' sites will obtain planning permission for housing in accordance with the policies in this Local Plan during the plan period. In general terms, development outside of defined Settlement Development Boundaries will be the subject of strict control to protect and enhance the character and openness of the countryside. However, there are certain forms of development that can and sometimes need to take place in these areas, some of which can bring about positive outcomes for the rural economy.

Policy SPL 2

SETTLEMENT DEVELOPMENT BOUNDARIES

To encourage sustainable patterns of growth and carefully control urban sprawl, each settlement listed in Policy SPL1 (with the exception of the Tendring Colchester Borders Garden Community) is defined within a 'Settlement Development Boundary' as shown on the relevant Policies Map and Local Map. Within the Settlement Development Boundaries, there will be a general presumption in favour of new development subject to detailed consideration against other relevant Local Plan policies and any approved Neighbourhood Plans.

Outside of Settlement Development Boundaries, the Council will consider any planning application in relation to the pattern and scales of growth promoted through the Settlement Hierarchy in Policy SPL1 and any other relevant policies in this plan.

An exemption to this policy is provided through the Rural Exception Site Policy LP6.

The Tendring Colchester Borders Garden Community will be the subject a separate Development Plan Document (DPD) containing its own policies designed to guide the location of development in the broad location identified on Diagram 10.2 in Section 1 of the Local Plan and Map B.7

This Policy contributes towards achieving Objectives 1 and 6 of this Local Plan.

Appendix – 5

5 Sustainable Design

5.1 Policy SPL3 contains the design criteria against which every planning application for development will be considered. Part A of the policy provides the local planning criteria for ensuring development is well designed and relates well to its surroundings. Part B ensures that practical requirements have been addressed and Part C ensures that any potential impacts on surrounding uses and/or the local environment are identified, and measures are put in place to ensure any adverse impacts are minimised.

Policy SPL 3

SUSTAINABLE DESIGN

Part A: Design. All new development (including changes of use) should make a positive contribution to the quality of the local environment and protect or enhance local character. The following criteria must be met:

a. new buildings, alterations and structures are well designed and maintain or enhance local character and distinctiveness;

b. the development relates well to its site and surroundings particularly in relation to its siting, height, scale, massing, form, design and materials;

c. the development respects or enhances local landscape character, views, skylines, landmarks, existing street patterns, open spaces and other locally important features;

d. the design and layout of the development maintains or enhances important existing site features of landscape, ecological, heritage or amenity value; and

e. boundary treatments and hard and soft landscaping are designed as an integral part of the development reflecting the function and character of the development and its surroundings. The Council will encourage the use of locally distinctive materials and/or locally occurring and characteristic hedge species.

Part B: Practical Requirements. New development (including changes of use) must meet practical requirements. The following criteria must be met:

a. access to the site is practicable and the highway network will, following any required mitigation, be able to safely accommodate the additional traffic the proposal will generate and not lead to severe traffic impact;

b. the design and layout of the development maintains and/or provides safe and convenient access for people with mobility impairments;

c. the development incorporates or provides measures to minimise opportunities for crime and anti-social behaviour;

d. the applicant/developer can demonstrate how the proposal will minimise the production of greenhouse gases and impact on climate change as per the Building Regulations prevailing at the time and policies and requirements in this plan;

e. buildings and structures are designed and orientated to ensure adequate daylight, outlook and privacy for future and existing residents;

f. provision is made for adequate private amenity space, waste storage and recycling facilities, vehicle and cycle parking; and g. the development reduces flood risk and integrates sustainable drainage within the development, creating amenity and enhancing biodiversity.

Part C: Impacts and Compatibility. New development (including changes of use) should be compatible with surrounding uses and minimise any adverse environmental impacts.

The following criteria must be met:

a. the development will not have a materially damaging impact on the privacy, daylight or other amenities of occupiers of nearby properties;

b. the development, including any additional road traffic arising, will not have unacceptable levels of pollution on: air, land, water (including ground water), amenity, health or safety through noise, smell, dust, light, heat, vibration, fumes or other forms of pollution or nuisance;
c. the health, safety or amenity of any occupants or users of the proposed development will not be materially harmed by any pollution from an existing or committed use; and
d. all new development should have regard to the most up to date adopted Essex Mineral Local Plan; and
e. during the construction phase, developers must comply with a 'considerate constructors' scheme' which employs reasonable measures and techniques to minimise and mitigate impacts and disturbance to neighbours and the existing wider community and any damage to public and private property.

All new development (including changes of use) should incorporate climate change adaptation measures and technology from the outset including reduction of emissions, renewable and low carbon energy production, passive design, and through green infrastructure techniques, where appropriate.

When considering new development, applicants and developers should avoid adverse impacts upon the environment. Where this is not possible, mitigation measures should be put forward. As a last resort, compensate for adverse environmental impacts.

Any measures necessary to meet the above requirements are to be established by the applicant/developer.

This Policy contributes towards achieving Objectives 6, 7 and 8 of this Local Plan

Appendix – 6

6 Healthy Places

6.1 Improving Health and Wellbeing

6.1.1 The Local Plan's strategic objectives for Healthcare Needs are "To work with partners in the National Health Service, local health organisations and local community groups to ensure adequate provision of healthcare facilities to support growing communities."

6.1.2 Good health and wellbeing means that wherever possible people are free of illness or disability, and they have a positive physical, social and mental state. The Council wants people in Tendring District to have healthier, happier and longer lives with less inequality. Health and Wellbeing has been a priority for a number of years to the partners in Tendring District.

6.1.3 Tendring District has a higher-than-average proportion of older and disabled people and, for many, the provision of health services is an essential part of everyday life. For our residents, being able to access primary health care is one of the biggest concerns for the future with many people worried that more housing developments and an increasing population could have significant impact upon over-stretched health services.

6.1.4 The Essex Joint Strategic Needs Assessment (JSNA, 2016) stated that in Tendring District:

- 68.3% of adults are classified as overweight or obese compared to the national average of 64.6%.
- 2,980 people aged over 65 are thought to have dementia. This figure is estimated to rise to 3,995 by 2025. The rising number of people with dementia will impact on future housing stock where consideration needs to be given to the availability of supported and sheltered housing and care homes.

6.1.5 In 2014, Tendring District had 29 GP surgeries located in Ardleigh, Alresford, Brightlingsea, Clacton, Frinton, Great Bentley, Great Oakley, Harwich, Lawford, Manningtree, Thorpe-le-Soken and Walton.

6.1.6 However, in recent years, resources particularly in the Clacton, Frinton and Walton areas have become stretched by the growing ageing population alongside difficulties in recruiting GPs and other medical professionals. Applicants for planning permission may be required to contribute towards the provision of new or improved health care facilities. The need for such facilities and the type of provision will be determined by the Health Care Commissioners and providers.

6.1.7 Through the proposals in this Local Plan, the Clacton, Frinton and Walton areas are expected to accommodate more than 3,000 new homes between them and the vision is to promote active retirement and the provision of care and assisted living. It will therefore be essential to ensure that current deficiencies in primary health care provision are addressed in partnership with Healthcare Commissioners.

6.1.8 The Council will work with its Health Sector partners to deliver new and improved facilities.

6.1.9 For secondary health care, the District hospitals at Clacton and Harwich provide a range of services including cardiology, diabetic medicine, minor injuries, podiatry, physiotherapy and urology but for other services many residents have to travel to Colchester General Hospital which, itself, is

under pressure from a growing population. In recognition of Tendring District's ageing population and the levels of housing development proposed for the Clacton area, of which a large proportion will cater for older people wishing to retire, the Council is also working with the NHS to explore the opportunities to increase and improve care closer to home services in the area, particularly those services of importance to an ageing population.

6.1.10 Primary care is adopting a Digital First approach to primary care investment. An agreed Integrated Care System Road map for Suffolk and North East Essex was introduced in 2019, many of the initiatives were brought forward as a result of the response to Covid 19 and have already proven successful. GP practices, care homes and community service providers have been using telephone/video consultations, smartphone applications to enable patients to request prescriptions and appointments. Practices within Primary Care networks will enable digital first options to improve fast access to primary care, reducing waiting and travelling time for patients, services will include outpatient follow up appointments and medication reviews. Consequently, the need for high-speed broadband access and flexibility in terms of the provision of digital health infrastructure to any new housing development is crucial in order to ensure the success of the Digital First approach.

6.1.11 Most development has a potential impact upon the health services and facilities in the District but good design can help to promote healthy living. These impacts and opportunities need to be assessed to ensure that adequate health and services are provided for the community as a whole. Local authorities across Essex are in agreement that applications for residential developments over 50 dwellings, all development in Use Class C2 (Residential Institutions) and non-residential developments involving the creation of 1,000 square metres or more floor space should be accompanied by a 'Health Impact Assessment' (HIA). A screening process will take place to determine the extent and detail/complexity of HIA required based on the type of development proposed and whether evidence demonstrates the development impacts can be expected to be significant on sensitive receptors.

6.1.12 This Local Plan has a vital role to play in ensuring that the opportunities exist for people to be able to make healthier life choices and addressing health inequalities across the District. Resilient local health policies will create and support vibrant, sustainable and healthy communities. By promoting and facilitating healthy living and creating an environment which offers opportunities for healthy choices.

6.1.13 The National Planning Policy Framework (paragraphs 69-70) acknowledges that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. It is imperative to ensure that the design of the built environment and new development does not increase health inequalities and make it harder for people to live healthy lives.

Policy HP 1

IMPROVING HEALTH AND WELLBEING

The Council will work to improve the health and wellbeing of residents in Tendring by:

a. working in partnership with the NHS and Public Health to ensure that our residents can access high quality primary and secondary health care services, and that new and improved services are put in place, where appropriate, to serve the growing population;

b. supporting the NHS (including local GP Surgeries) and Public Health to deliver a service which meets the needs of residents in Tendring District;

c. working with stakeholders on projects that provide better service integration, locating services where access can be improved, particularly for vulnerable groups and communities;

d. encouraging healthier communities through targeting of unhealthy lifestyles such as smoking and those which cause obesity as identified in the Joint Strategic Needs Assessment. The Council will work in collaboration with partners, including Public Health, to avoid a concentration of fast food takeaways, where the number of outlets would be likely to harm public health objectives, particularly in deprived communities; local areas of poor health and near schools;

e. requiring a Health Impact Assessment (HIA) on all development sites delivering 50 or more dwellings, all development in Use Class C2 (Residential Institutions) and all non-residential developments delivering 1,000 square metres or more gross internal floor space. The HIA should be carried out in accordance with the advice and best practice published by Public Health England and locally through the Essex Planning Officers Association;

f. seeking mitigation towards new or enhanced health facilities from developers where new housing development would result in a shortfall or worsening of health provision; and

g. ensuring increased contact with nature and access to the District's open spaces and offering opportunities for physical activities through the Haven Gateway Green Infrastructure and Open Space Strategies.

This Policy contributes towards achieving Objectives 5 and 6 of this Local Plan.

Appendix – 7

7 Community Facilities

7.0.1 Community facilities (sometimes referred to as Community assets) provide for health and wellbeing, recreational and leisure and education and culture. They can include for example, community halls, libraries, museums, arts venues, post offices, public houses, places of worship, sports halls, health and fitness facilities, swimming pools and other facilities of community value. They are a key part of sustainable communities and contribute to their self-reliance.

7.0.2 It is important that local communities are supported by a range of community facilities as they provide local employment opportunities, are a focal point for community life and can help reduce the need for people to travel long distances for essential goods and services.

7.1 Retention, Improvement and New Community Facilities Provision

7.1.1 The loss of community facilities can have a substantial impact on people's quality of life, wellbeing and overall viability of the local area. With the growing number of older people in Tendring District, access to locally based facilities will become increasingly important to ensure sustainable communities.

7.1.2 The Council will expect new development to retain, and where possible, improve existing local community facilities. It is important that these are integrated into the design of new development where possible.

7.1.3 For existing community facilities, the Council will work with its partners to secure future improvements and will protect them against redevelopments for alternative uses, particularly housing. Public houses, in particular, perform a useful social role in rural communities and are a source of local employment. They frequently occupy historic buildings and make a significant contribution to the character of the locality.

7.1.4 The viability of community facilities is an important consideration for a sustained local area. Planning applications that would result to the loss of community facilities should be accompanied by marketing information to show why existing use is not viable and information to show why the facilities are no longer needed by the community it serves or that the facility is being suitably relocated to meet local needs.

7.2 Assets of Community Value

7.2.1 Part 5 Chapter 3 of the Localism Act 2011(Act) provides for a scheme called 'assets of community value'. This requires District and unitary councils to maintain a list of 'community assets'. It has also become known as the 'community right to bid'.

7.2.2 Under the Act and through the Community Rights to Challenge and Build, parish councils, voluntary groups, neighbourhood forums, and other community organisations can consider the opportunity to develop or establish new community facilities. Local groups have the right to nominate a building or land for listing by the Council as an Asset of Community Value.

7.2.3 The National Planning Policy Framework (NPPF) paragraph 70 states that planning policies and decisions should: guide against unnecessary loss of valued community facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; and

ensure that established community facilities and services are able to develop and modernise in a way that is sustainable and are retained for the benefit of the community.

Policy HP 2

COMMUNITY FACILITIES

The Council will work with the development industry and key partners to deliver and maintain a range of new community facilities. New development should support and enhance community facilities where appropriate by:

a. providing on site, where necessary, or contributing towards new or enhanced community facilities to meet needs arising from the proposed development or growth and where possible, encourage co-location.

The loss or change of use of existing community or cultural facilities will be resisted unless:

b. replacement facilities are provided on site, or within the vicinity, which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or

c. it has been demonstrated that there is no longer a community need for the facility or demand for another community use on site.

This Policy contributes towards achieving Objectives 4, 5 and 6 of this Local Plan.

Appendix – 8

8 Green Infrastructure

8.1 The National Planning Policy Framework states that Green Infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. It includes 'blue infrastructure' comprising watercourses and wetlands, which provides a range of ecosystem services.

8.2 Ecosystem services are the benefits that the natural environment provides to humans, including the production of clean water and many raw materials used for economic activities and cultural benefits such as aesthetic value and recreational opportunities.

8.3 A good green infrastructure network provides opportunities to enhance tourism in the Tendring District, while ensuring that its most sensitive assets are protected. As well as the obvious benefits to the natural environment, such measures can also provide an economic boost by helping to attract more visitors and improve residents' health and wellbeing by creating a more attractive environment for people to actively use. The network should be made as accessible as possible to all users.

8.4 The National Planning Policy Framework (NPPF) requires planning to encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for recreation, wildlife, carbon storage and food production).

8.5 Throughout our District, there are a number of existing areas of green infrastructure falling into the various different categories which are important to the character of our towns, villages and rural areas and provide valuable space for formal and informal recreational activities in our communities. Areas of existing green infrastructure, including open space, sports and recreational facilities, will be protected from development, are shown on the Policies Map.

8.6 Development on these sites will only be allowed where it will result in an equivalent or larger area of green infrastructure of equal or better quality being provided in a location that will benefit more residents.

8.7 The Haven Gateway Green Infrastructure Study (2008) and the Open Space, Sport and Recreation study (2017) identified Tendring District as an area deficient in green infrastructure. The Council will work with its partners to resolve existing deficiencies and, where appropriate, secure developer contributions towards Green Infrastructure both as an integral part of major developments and through financial contributions to ensure that deficiencies are not exacerbated by future population growth.

8.8 The provision of high quality accessible green infrastructure is seen as increasingly important to regeneration and creating places that are based upon local distinctiveness. Quality environments also attract quality investment in terms of housing, jobs, skills and visiting attractions.

8.9 The Council's Open Spaces Strategy (2017) identified the nature of any existing surpluses and deficiencies and provides size and quality standards for the provision of future open spaces and green infrastructure in the District. This is reflected in the Policies HP3, HP4 and HP5 of this Local Plan.

8.10 Investment in Green Infrastructure for Tendring will help to tackle existing deficiencies of accessible green space, and help provide and protect wildlife corridors, open space and accessible land.

Policy HP 3

GREEN INFRASTRUCTURE

Green Infrastructure will be used as a way of adapting to, and mitigating the effects of, climate change, through the management and enhancement of existing spaces and habitats and the creation of new spaces and habitats, helping to provide shade during higher temperatures, flood mitigation and benefits to biodiversity, along with increased access.

All new development must be designed to include and protect and enhance existing Green Infrastructure in the local area, as appropriate.

Green Infrastructure as identified on the Policy Map, will be protected, managed and where necessary enhanced by:

a. managing development to secure a net gain in green infrastructure;

b. supporting investment priority projects set out in the Green Infrastructure Delivery Plan;

c. not permitting development that compromises the integrity of the overall Green Infrastructure networks;

d. investing in enhancement and restoration where opportunities exist; and

e. using developer contributions to facilitate improvements to their quality and accessibility.

The Council will work with all sectors and interest groups to help deliver Green Infrastructure projects. Developers should use the guiding principles set out in the Green Infrastructure Delivery Plan to influence all development proposals from an early stage in the design process. Any new Green Infrastructure proposed must be accompanied by a plan for the long-term sustainable maintenance and management of these assets, as well as phasing plans to demonstrate how they are to be delivered. New Green Infrastructure should incorporate semi-natural habitats and provide net gains in biodiversity wherever possible. The long-term management of assets should include biodiversity recording/monitoring to verify/ensure the ecological integrity of GI networks. Green Infrastructure should, where appropriate, include access for the widest range of user groups.

This Policy contributes towards achieving Objectives 6 and 8 of this Local Plan.

Appendix – 9

9 Open Space, Sports and Recreation Facilities

9.1 The National Planning Policy Framework (Annex 2) defines open space as 'all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and act as a visual amenity'.

9.2 The Council's Open Space Strategy (2017), prepared by Knight, Kavanagh and Page Ltd, identified the following typologies of open spaces across the District:

- parks and gardens;
- natural and semi-natural greenspaces; and
- amenity greenspace.

9.3 Amenity space including:

- provision for children and young people;
- allotments;
- cemeteries/churchyards; and
- Playing pitches and Outdoor Sports Facilities.

9.4 The above typologies are protected by Policy HP4 and are shown on the Policies and Local Maps collectively as Safeguarded Open Space. The Neighbourhood Planning process allows Town and Parish Councils or other nominated bodies to identify open spaces of particular local value as 'Local Green Space' which are afforded an additional level of protection, ruling out new development other than in very special circumstances. In line with the requirements of the National Planning Policy Framework, this additional level of protection can only be applied to green spaces where they are in reasonably close proximity to the community they serve, are demonstrably special to the local community and hold a particular significance and are local in character, rather than an extensive tract of land.

9.5 Open Spaces in towns and rural areas are essential in improving public health, well-being and quality of life. Attractive, safe and accessible parks and green spaces contribute positively to social, economic and environmental benefits and promote sustainable communities. Major new housing and mixed-use developments should include new and improved access to schools, to enable children to walk or cycle from their homes.

9.6 Well-used and maintained open spaces make considerable contribution to the quality of life of residents and visitors and promote sustainable communities. Each type of open space has various benefits, for example parks for recreation and play and social events, children's play and playing pitches for formal sports events and allotments for growing produce.

9.7 It is important to provide a balance between different types of open space in order to meet local needs. For example, not all residents living in every area will have a demand for open space in the form of playing pitches or allotments. In some areas there will be a specific local demand for 'green corridors' such as nature walk or bridleways.

9.8 The National Planning Policy Framework, Planning Policy Guidance and the North Essex Strategic Plan, Section 1 of this Local Plan provide a context for the protection of existing open space. The

NPPF (paragraph 74) suggests that existing open space, sports and recreational buildings and land, including playing fields should be protected unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity, quality and in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Policy HP 4

SAFEGUARDED OPEN SPACE

Development that would result in the loss of the whole or part of areas designated as Safeguarded Open Space , as defined on the Policies Map and Local Maps will not be permitted unless the following criteria are met:

a. the site is replaced by the provision of new site at least equal in quality and size and accessible to the community, which the existing site serves;

b. it is demonstrated that there is no longer a demand for the existing site;

c. the site is not appropriate for other open space functions; and

d. the development of the site would not result in the loss of an area important to visual amenity.

Land is also allocated for the future expansion of the Weeley Crematorium, the Burrs Road Cemetery (Clacton), Dovercourt Cemetery and the Kirby Cross Cemetery as shown on the various Policies Maps and Local Maps for these areas. New cemeteries and other burial places may be permitted on existing private land providing that relevant Local Plan policies are satisfied**.**

9.9 Locally based open space standards have been developed in the Tendring Open Spaces Strategy, and proposals for new residential development should contribute to the provision and/or enhancement of open space in areas where there is a deficiency in provision, or poor quality of, open spaces. This provision could be either on or off-site depending on the scale and nature of development and the level and quality of existing facilities in the local area.

9.1.10 This Local Plan, requires that open space provision should be included as part of all residential developments involving sites of 1.5 hectares in size or greater, and should comprise at least 10% of the gross site area and that no single area of usable open space should be less than 0.15 hectares.

Appendix – 10

10 Protected Places

10.0.1 It is very important to protect the quality of the District's most special natural and built environments. There are many reasons for this, including the international importance and vulnerability of its extensive coastal and estuarine areas and the historic quality of its numerous designated conservation areas and listed buildings. Protecting the quality of both the natural and built environments is necessary to ensure that the Council meets its legal obligations in those regards and that the District is a safe and attractive place to live, work and visit, thereby helping to underpin the local economy and attract inward investment seeking a quality environment. To ensure that new development is sustainable, it is essential that proposals have regard to, amongst other things, the need to avoid causing harm to sensitive areas and that it takes the opportunities available to enhance the quality of places.

10.0.2 In order to deliver a positive future for the District's environment, the policies in this chapter will focus upon:

- minimising the risk to human life and property from flooding and coastal erosion, taking into account the likely effects of climate change;
- protecting and enhancing the District's biodiversity, countryside and its coastal assets;
- expanding the District's network of Green Infrastructure, to encourage a net gain for nature, achieve sustainable drainage and deliver green corridors and open spaces to improve the quality of the natural environment;
- conserving natural resources through the promotion of low-carbon energy and water-efficiency in new development and local renewable energy; and
- preserving the District's historic assets.

10.1 Development and Flood Risk

10.1.1 The Local Plan's strategic objective for Water and Climate Change is "To reduce the risk of flooding by securing the appropriate location and design of new development, having regard to the likely impact of climate change." 7.1.2 As a peninsula, Tendring District has coastal and estuarine water on three sides. With over 37miles/60km of coastline, many parts of the District are at risk of tidal flooding, including some very built-up areas. The National Planning Policy Framework makes it clear that inappropriate development in areas at risk of flooding should be avoided. New development should be directed away from areas at highest risk of flooding, but where such development is necessary it should be made safe – without increasing flood risk elsewhere. The policies and proposals in this Local Plan have therefore been informed by the national planning policy requirements, the findings of the Strategic Flood Risk Assessments (SFRA) and advice from the Environment Agency.

10.1.2 The areas of the District considered to be at greatest risk of flooding according to the Environment Agency's flood risk maps are shown within a 'Flood Zone' on the Policies Maps and Local Maps. This information should be used only as a guide, as areas at risk may change during the Local Plan period. The Environment Agency Flood Risk Maps should always be used for the latest flood risk information and to distinguish between Flood Zones 2 and 3. The government's 'Technical Guidance to the National Planning Policy Framework' provides more detail on how the 'Sequential Test' should be applied to new development proposals. The Council will work with the Environment

Agency to consider how existing development and proposed new development, in flood risk areas, including in Jaywick Sands, can be made more flood-resilient and sustainable.

10.1.3 Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. The emergency flood plan should be submitted as part of a FRA and will need to be agreed with TDC. Refuge should ideally be located 300mm above the 0.1% (1 in 1000) annual probability event flood level including allowances for climate change.

10.1.4 New development proposals should: - retain at least an 8m wide undeveloped buffer strip alongside Main Rivers and explore opportunities for riverside restoration. Any proposed development within 8m of a main river will require an environmental permit from the Environment Agency. - retain at least a 3m buffer strip on at least one side of an Ordinary watercourse. Any development that could impact the flow within and ordinary watercourse will require consent from Essex County Council (as LLFA).

Policy PPL 1

DEVELOPMENT AND FLOOD RISK

All development proposals should include appropriate measures to respond to the risk of flooding on and/or off site. Within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, development proposals must be accompanied by a Flood Risk Assessment. Where development is classified as "more vulnerable" the Flood Risk Assessment (FRA) should demonstrate that there will be no internal flooding in the event of a "design event flood". The FRA should demonstrate that in the event of a breach or failure of flood defence infrastructure, refuge will be available above flood levels and that a means of escape is possible from first floor level.

All development classified as "More Vulnerable" or "Highly Vulnerable" within Flood Zone 2 and 3 should set finished floor levels 300mm above the known or modelled 1 in 100 annual probability (1% AEP) flood level including an allowance for climate change.

All new development within Flood Zones 2 and 3 must not result in a net loss of flood storage capacity, unless there is compensation on site or, if not possible, adjacent off site capacity. Where possible opportunities should be sought to achieve an increase in foodplain storage.

All major development proposals should consider the potential for new Blue and Green Infrastructure to help mitigate potential flood risk and include such Green Infrastructure, where appropriate.

All development proposals will be considered against the National Planning Policy Framework's 'Sequential Test', to direct development toward sites at the lowest risk of flooding, unless they involve land specifically allocated for development on the Policies Maps or Local Maps.

Where new development cannot be located in an area of lower flood risk and is otherwise sustainable, the Exception Test will be applied in accordance with the National Planning Policy Framework so that it is safe and meets wider sustainability needs.

This Policy contributes towards achieving Objective 9 of this Local Plan.

Appendix – 11

11 The Rural Landscape

11.1 In order to promote sustainable development, in considering where to select sites for new development in this Local Plan, the Council has taken particular care to assess the value of the landscape and, where practical, allocate sites with the lowest sensitivity, thereby helping to protect valued landscapes and the best and most versatile agricultural land.

11.2 The Landscape Character Assessment (2001) identified 30 areas with different landscape characteristics and highlighted key sensitivities which need to be considered when assessing development proposals in the rural area. Proposals within the rural landscape should have regard to the Landscape Character Assessment (and any subsequent updates) and protect and re-inforce historic landscape features and important characteristics identified within it.

11.3 As a largely rural area, Tendring District's countryside is one of its main assets and maintaining an attractive rural environment is important to the quality of life experienced by both residents and visitors. It can also be an important consideration for the location of some businesses and help to expand the tourist economy and related services.

11.4 Parts of the District to the north are designated as Areas of Outstanding Natural Beauty (AONB) – The Dedham Vale and the recently extended Suffolk Coast and Heaths which are therefore subject to special landscape protection. On 7th July 2020 the Secretary of State confirmed the designation of three extensions to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (SC&H AONB). The three new boundary extensions will increase the size of the existing AONB by approximately 38 sq. km or 9.5%. The areas now confirmed as forming part of the SC&H AONB are:

- the Stour Estuary including the estuary itself, northern estuary valley slopes at Brantham and the majority of the southern estuary valley slopes in Essex;
- the Freston Brook Valley, a tributary of the Orwell Estuary which extends inland from the existing AONB boundary westwards and includes surrounding plateau woodlands; and,
- the Samford Valley, a tributary of the Stour Estuary, which extends further inland from the existing AONB boundary at Stutton Bridge and includes some areas of neighbouring Shotley Peninsula Plateau

The newly extended AONB can be seen as a single designation on the proposal's maps within this Local Plan.

11.5 Tendring has four Registered Parks and Gardens (see Appendix D) lie within the rural area and are particularly sensitive to change. Planning proposals which might affect them and any other Registered Park and Garden that is designated during the plan period should therefore have regard to their history and the reason for inclusion on the Historic England Register.

Policy PPL 3

THE RURAL LANDSCAPE

The Council will protect the rural landscape and refuse planning permission for any proposed development which would cause overriding harm to its character or appearance, including to:

a. estuaries, rivers and undeveloped coast;

b. skylines and prominent views including ridge-tops and plateau edges;

c. traditional buildings and settlement settings;

d. native hedgerows, trees and woodlands;

e. protected lanes, other rural lanes, bridleways and footpaths; and

f. designated and non-designated heritage assets and historic landscapes including registered parks and gardens.

Development proposals affecting protected landscapes must pay particular regard to the conservation and enhancement of the special character and appearance of the Dedham Vale and Suffolk Coast and Heaths AONBs, and their settings, including any relevant AONB Management Plan objectives. Elsewhere, development proposals should have regard to the Natural England Character Area profiles for the Greater Thames Estuary (No.81) and the Northern Thames Basin (No.111) and the Council's Landscape Character Assessments, as relevant, and should protect and reinforce identified positive landscape qualities.

New development within the rural landscape should minimise the impact of light pollution on the site and its surroundings, in order to protect rural amenity and biodiversity.

This Policy contributes towards achieving Objectives 7 and 8 of this Local Plan

Appendix – 12

12 Biodiversity and Geodiversity

12.1 Tendring District includes a wide range of habitats, including (in part) the Stour, Orwell and Colne Estuaries and Hamford Water which are recognised as wetlands of international importance for endangered and migrating birds. Hamford Water is a designated Special Area of Conservation for Fisher's Estuarine Moth. At the international level, the Ramsar Convention requires the conservation and wise use of wetlands, as a contribution towards achieving sustainable development. European legislation requires the establishment of Special Protection Areas (SPAs) for birds, under the Birds Directive, and Special Areas of Conservation (SACs) for other species and habitats, under the Habitats Directive. SPAs and SACs together form 'Natura 2000' sites, which themselves create a European-wide network. The Conservation of Habitats and Species Regulations 2010 (the 'Habitats Regulations') apply both in the terrestrial environment and territorial waters out to 12 nautical miles. Marine Protected Areas (MPA) exist offshore beyond 12 nautical miles. The Blackwater, Crouch, Roach and Colne Marine Conservation Zone includes the Clacton Cliffs and foreshore, a geological feature of international importance.

12.2 It is necessary to apply the 'precautionary principle' to new development, as a matter of law, and assess new projects or plans for any impacts upon any of the above sites – both alone and in combination. Proposals and plans with the potential to have a significant impact upon such sites will need to be supported by a Habitats Regulation Assessment (HRA) to provide the information necessary for the decision makers to establish the likelihood and nature of impacts before a decision is taken. If significant impacts are identified, an 'Appropriate Assessment' may be necessary to assess whether the proposals would adversely affect the integrity of a site, having regard to its conservation objectives. The Council will only grant planning permission where there would be no adverse effects on biodiversity (including any mitigation), unless there is considered to be an overriding public interest (such as the port expansion at Bathside Bay, Harwich) – in which case a compensatory habitat must be provided. The Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Strategy Document was adopted in 2019. The Essex Coast RAMS aims to deliver the mitigation necessary to avoid adverse effects on integrity from the in-combination impacts of residential development in Essex. The Essex Coast RAMS identifies a detailed programme of strategic avoidance and mitigation measures which are to be funded by developer contributions from all residential development within the Zones of Influence.

12.3 Sites of Special Scientific Interest (SSSI) are protected under the Wildlife and Countryside Act 1981, as amended, and the Countryside and Rights of Way Act 2000 and are shown on the Policies Map.

12.4 The Colne Estuary and Hamford Water are designated as National Nature Reserves (NNR). At the local level, the Council has worked with the Essex Wildlife Trust to identify over 100 'Local Wildlife Sites' (LoWS) within the District, along with 'Special Roadside Verges', managed by Essex County Council specifically to conserve rare plant species and support a wider variety of plants. This benefits local fauna, providing food and shelter and can help to create 'wildlife corridors', allowing species to move between different sites. LoWS are not protected by law but, being worthy of conservation, are protected by this Local Plan, along with irreplaceable habitats, including unimproved grasslands and veteran trees.

12.5 All areas designated for their value to biodiversity and/or geodiversity are shown on the Policies Maps. A site does not have to be designated, however, to have importance to nature conservation. All new development proposals should have regard to a 'mitigation hierarchy' approach, which requires consideration to be given: firstly, to avoiding environmental harm; then mitigating for any adverse impacts; and then, as a last resort; compensating for residual impacts alongside the need to seek environmental enhancement and a 'net gain' in biodiversity in line with latest Natural England advice. The need to consider alternative options, particularly options that are less damaging to the environment, is relevant to all these steps, as options can be either strategic or more detailed in nature. Where a proposed development might harm biodiversity on the site, an Ecological Appraisal will be required to be undertaken and the potential for harm should be considered and addressed in the application. Appraisals should be undertaken in accordance with nationally recognised guidance, by a suitably qualified ecologist.

12.6 Conservation work now considers whole landscapes as the way to conserve biodiversity, and the Council is working with Essex County Council, Essex Wildlife Trust and other partners on projects to benefit habitats and species across Essex. The Biodiversity Framework and Living Landscapes Project seek to improve the wider countryside for wildlife, rather than just concentrating on small nature reserves, and this will bring benefits for Priority Habitats and Priority Species.

Policy PPL 4

BIODIVERSITY AND GEODIVERSITY

Sites designated for their international, European and national importance to nature conservation: including Ramsar sites; Special Protection Areas (SPAs); Special Areas of Conservation (SACs); Marine Conservation Zones (MCZs); National Nature Reserves (NNRs); and Sites of Special Scientific Interest (SSSIs) will be protected from development likely to have an adverse effect on their integrity.

Where proposals for development are likely to significantly impact upon International and European sites, applications must be supported by a Habitats Regulation Assessment (HRA) to provide sufficient information to the Council to establish the likelihood and nature of impacts before a decision can be made. If necessary, this may need to be followed by a more detailed 'Appropriate Assessment' of the impacts. An Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has been completed in compliance with the habitats Directive and Habitats Regulations. Contributions will be secured from residential development, within the Zones of Influence, towards mitigation measures identified in RAMS.

As a minimum, there should be no significant impacts upon any protected species, including European Protected Species and schemes should consider (and include provision, as may be relevant for) the preservation, restoration or re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations. Proposals for new development should also have regard to any published local Recreational Disturbance Avoidance and Mitigation Strategies and include any measures which may be necessary to support the aims of the strategy, to help to mitigate any likely recreational impacts arising from the development. Proposals for enhancement of special interest and features will be supported, subject to other material planning considerations.

Sites designated for their local importance to nature conservation, including Local Wildlife Sites (LoWS), Ancient Woodlands Protected Verges and aged or veteran trees will be protected from development likely to have an adverse impact on such sites or features. Proposals for enhancement of special interest and features will be supported, subject to other material planning considerations.

Proposals for new development should be supported by an appropriate ecological assessment. Where new development would harm biodiversity or geodiversity, planning permission will only be granted in exceptional circumstances, where the benefits of the development demonstrably outweigh the harm caused and where adequate mitigation or, as a last resort, compensation measures are included, to ensure a net gain, in biodiversity.

Proposals for new infrastructure and major development should consider the potential for enhanced biodiversity, appropriate to the site and its location, including, where appropriate, within Green Infrastructure.

Any proposed development on sites which may support protected species will require a relevant survey(s), undertaken by a suitably qualified ecologist. If protected species are present, a suitable mitigation plan will be required prior to planning permission being granted.

This Policy contributes towards achieving Objective 8 of this Local Plan.

Appendix – 13

13 Water Conservation, Drainage and Sewerage

13.1 Although Tendring District has to manage issues of 'excess' water causing coastal erosion and flooding, it also experiences the lowest average level of annual rainfall in the country and therefore maintaining a supply of fresh water for drinking and the irrigation of crops is a high priority. It follows that the provision of an adequate water supply, and appropriate methods of disposal of water and sewage, are very important considerations when planning for growth and central to the need to deliver sustainable development. Changes in climate also can cause sudden and intense rainfall causing localised flooding which will be made worse if new development does take account of the need to lessen its impact.

13.2 Major new developments may require upgrades to existing sewage treatment works, known as Water Recycling Centres, which may be funded by Anglian Water. Such works will need to be planned and funded through Anglian Water's 5-year business plans and approved by the regulator (OFWAT). The Council is committed to ensuring that critical infrastructure is delivered at the right time to support development on allocated sites, in particular at Hartley Gardens (Policy SAMU2) and Oakwood Park (Policy SAMU3) where reinforcements and additional infrastructure will be required.

13.3 The National Planning Policy Framework requires local planning authorities to mitigate and adapt to climate change, which includes having pro-active strategies in respect of water supply and demand. Development proposals should therefore include a plan to conserve water supplies by managing demand and ensure its appropriate disposal at all stages of development, including construction and after occupation, using Sustainable Drainage Systems (SuDS) where possible. SuDS are designed to replicate natural drainage systems, to drain surface water run-off, ideally as part of a Green Infrastructure network and can also have significant benefits for amenity and biodiversity.

13.4 SuDS techniques may not be appropriate in circumstances where infiltration may cause a hazard to groundwater quality, such as groundwater source protection zones, on known contaminated land and on sites with a shallow water table. The Environment Agency's Source Protection Zone maps should be checked to ensure there is no risk to groundwater quality. Surface water treatment will be required before infiltration to groundwater is permitted. A risk assessment should be undertaken when using Infiltration components in areas of contaminated land.

Policy PPL 5

WATER CONSERVATION, DRAINAGE AND SEWERAGE

All new development must make adequate provision for drainage and sewerage and should include Sustainable Drainage Systems (SuDS) as a means of reducing flood risk, improving water quality, enhancing the Green Infrastructure network and providing amenity and biodiversity benefits. Applicants should explain and justify the reasons for not using SuDS if not included in their proposals, which should include water inputs and outputs designed to protect and, where possible, enhance the natural environment. New dwellings will be required to incorporate measures to achieve a water consumption rate of not more than 110 litres, per person, per day.

Proposals for development must demonstrate that adequate provision exists, or can be provided in time, for sewage disposal to a public sewer and water recycling centre (sewage treatment works).

Applicants should explain their approach to water conservation, including the potential for the re-use of 'greywater' and rainwater 'capture and use' within their development, to help maintain the supply of drinking water. The Council will require such measures to be implemented in all new development.

Private sewage treatment facilities will not be permitted if there is an accessible public fowl sewer. Where private sewage treatment facilities are the only practical option for sewage disposal, they will only be permitted where there would be no harm to the environment, having regard to preventing pollution of groundwater and any watercourses and odour.

Proposals for agricultural reservoirs may be permitted, subject to a detailed assessment against relevant policies in this Local Plan.

This Policy contributes towards achieving Objectives 8 and 9 of this Local Plan.

Appendix – 14

14 The Historic Environment

14.1 The Local Plan's strategic objective for Cultural Heritage is "To conserve and enhanceTendring District's heritage, respecting historic buildings and their settings, links and views."

14.2 Tendring District has a truly rich and diverse history, reflected in archaeological deposits and features and much of its built heritage, which includes: the early planned development of the District's major town, Clacton-on-Sea, as a Victorian seaside holiday resort; the later select development of Frinton-on-Sea with its many examples of notable Arts and Crafts architecture and Modernist houses; the historic port of Harwich and town of Manningtree, England's smallest; or the District's most important single group of listed buildings at St Osyth's Priory and its Registered Historic Park and Garden.

14.3 The Council has specific legal duties to preserve and enhance the historic environment. Proposals affecting buildings listed for their special architectural or historic interest ('listed buildings') or designated Conservation Areas, or their settings, Scheduled Monuments, archaeology, or Registered Historic Parks and Gardens will therefore be subject to particular scrutiny. The setting of a heritage asset may include sites or areas a considerable distance away from the boundary of an application site and it is necessary, therefore, to consider the potential for development to have an effect upon the wider setting of a Conservation Area or listed building. Protection of the District's heritage assets is crucial to its cultural identity and the quality of life and can help to sustain its economic attraction for new investment by both residents and businesses. The Council will seek to reduce the number of heritage assets included in the Heritage at Risk Register and will consider designating additional heritage assets which are of local importance. The Council will seek to manage change within the Historic Environment by: requiring proposals to respond appropriately to the significance of any affected heritage assets; identifying where interventions within the Historic Environment would be beneficial to it; and by working with partners to secure sources of funding to aid delivery of enhancements to heritage assets.

14.4 The best way to ensure the future preservation of a listed building is often by ensuring an appropriate beneficial use of the heritage asset, which may be its original intended use. Sometimes an appropriate new use will be needed to ensure preservation and this might also present opportunities for the enhancement of significance of the heritage asset. Historic buildings may also evolve over time and sometimes it can be those distinct elements of change which are particularly valued. Although the preservation of unique historic assets is crucial to connect with the past and maintain a high quality environment there may be the opportunity for a high quality contemporary design solution in an historic context. It might, therefore, be appropriate in this Local Plan period to propose a development 'of its time' - much will depend on the expertise of the designer. However, the scope for a listed building to adapt to modern life and requirements will itself depend upon a number of considerations and it will not always be possible to incorporate modern design solutions without also causing harm to its special character, fabric, or appearance.

14.5 As with listed buildings, a contemporary design might, be appropriate in a Conservation Area. Such solutions can help to avoid pastiche or the potential 'confusion' of new and can misinform an understanding of place. However, particular skill is required of the designer to ensure that new development is appropriate to its site and setting. New development which would affect a Conservation Area should always pay regard to any relevant Conservation Area Character Appraisal

and Conservation Area Management Plan. This includes proposals for new development within the District's four Registered Historic Parks and Gardens: Clacton Seafront (owned and managed by the Council); St Osyth Priory; Thorpe Hall and Beth Chatto Gardens all which (except Beth Chatto) are within Conservation Areas. The Council will review all designated Conservation Areas early in the plan period and consider whether any new areas should be designated. New Conservation Area Management Plans will be prepared in addition to updates to the existing Conservation Area Character Appraisals.

14.6 Some parts of the District are known for their particular importance to archaeology and the Council will protect those areas from harmful development. However, new development can provide an opportunity to discover, record and protect evidence of the District's history in the form of archaeological deposits. Where the archaeological record indicates the likely presence of deposits or features, the Council will be advised by Essex County Council and the developer will be required to carry out any necessary survey work, excavation and recording in that regard, before and/or after any planning permission is granted. New development may be required to respond to archaeological finds uncovered during the construction process.

14.7 The National Planning Policy Framework sets out government policy for conserving and enhancing the historic environment. The following policies PPL7, PPL8 and PPL9 will be applied alongside and having regard to the specific requirements of the Framework in respect of development affecting designated and non-designated heritage assets including Archaeology, Conservation Areas and Listed Buildings.

14.8 Within Tendring District there is a wealth of historic structures, landscapes and other features which are not formally designated as heritage assets on the national list prepared by Historic England. The Council does however recognise their local historic significance. These kinds of 'non-designated' heritage assets can be 'locally listed' by the Council. The Council has therefore commenced work on a 'local list' which will identify and protect these assets of local importance. The Council will work with community groups, landowners and Historic England to prepare a local list for the district.

Policy PPL 7

ARCHAEOLOGY

Any new development which would affect, or might affect, designated or non-designated archaeological remains will only be considered where accompanied by an appropriate desk-based assessment. Where identified as necessary within that desk-based assessment, a written scheme of investigation including excavation, recording or protection and deposition of archaeological records in a public archive will be required to be submitted to, and approved by, the Local Planning Authority.

Proposals for new development affecting a heritage asset of archaeological importance or its setting will only be permitted where it will protect or where appropriate enhance the significance of the asset. Where a proposal will cause harm to the asset, the relevant paragraphs of the NPPF should be applied dependent on the level of the harm caused.

Proposals will be treated favourably where they:

a. are explained and justified through an informed assessment and understanding of the significance of the heritage asset (including any contribution made to that significance by its setting); and

b. are of a scale, design and use materials and finishes that respect the heritage asset.

Within the District the Council keeps a record of scheduled monuments at risk of degradation. The Council will support proposals that protect and enhance heritage assets at risk.

Proposals for new development which are not able to demonstrate that known or possible archaeological remains will be suitably protected from loss or harm, or have an appropriate level of recording, will not be permitted.

This Policy contributes towards achieving Objective 7 of this Local Plan.

Appendix – 15

Policy PPL 8

CONSERVATION AREAS

New development within a designated Conservation Area, or which affects its setting, will only be permitted where it has regard to the desirability of preserving or enhancing the special character and appearance of the area, especially in terms of:

a. scale and design, particularly in relation to neighbouring buildings and spaces;
b. materials and finishes, including boundary treatments appropriate to the context;
c. hard and soft landscaping;
d. the importance of spaces and trees to the character or appearance; and
e. any important views into, out of, or within the Conservation Area.

Proposals should be explained and justified through an informed assessment and understanding of the significance of the heritage asset (including any contribution made to that significance by its setting).

Proposals for new development involving demolition within a designated Conservation Area must demonstrate why they would be acceptable, particularly in terms of the preservation and enhancement of any significance and impact upon the Conservation Area.

Where a proposal will cause harm to a Conservation Area, the relevant paragraphs of the NPPF should be applied dependent on the level of harm caused.

Within the District the Council keeps a record of conservation areas that are at risk of degradation. The Council will support proposals that protect and enhance the conservation areas at risk.

Development should conserve or enhance the significance of the registered parks and gardens (noting that significance may be harmed by development within the setting of an asset).

In collaboration with community groups and other interested parties, the Council will consider and support the designation of new Conservation Areas in line with the relevant criteria as set out within the NPPF and legislation. New Conservation Area Management Plans will be prepared in addition to updates to the existing Conservation Area Character Appraisals.

This Policy contributes towards achieving Objective 7 of this Local Plan.

Appendix – 16

16 Renewable Energy Generation and Energy Efficiency Measures

16.1 The National Planning Policy Framework requires local planning authorities to adopt proactive strategies to mitigate climate change and promote sustainable development. By effectively exploiting the free resources of wind and sun, in particular, renewable energy can reduce the demand for fossil fuels, which are a finite resource and release carbon into the atmosphere and accelerate global warming.

16.2 Tendring District supports renewable energy generation in terms of wind energy, solar energy and biomass installations. It currently has one wind farm comprising five large-scale wind turbines at Earls Hall Farm, west of Clacton, and a number of medium and small-scale turbines throughout the District. Several solar farms are concentrated in the northern part of the District, with smaller arrays adjacent to several farms. A significant biomass generator also exists at Elmstead. The Council has supported the offshore windfarm at Gunfleet Sands which required on-shore infrastructure. Subsequent changes in government policy, both in respect of planning and subsidies for renewables, mean that applications for new large-scale renewable energy schemes might not come forward in this Local Plan period. However, it remains necessary to plan for renewable energy generation, in order to meet national climate-change commitments and to this end the Council may prepare a further development planning document (DPD) identifying how such development can be supported.

16.3 In 2019, the Council declared a climate emergency, committing it to the preparation of an action plan with the aim of making its own activities carbon neutral by 2030 and acting as a community leader to encourage communities and developers to reduce carbon emissions and tackling climate change. Policy PPL10 below requires proposals for new development to consider the potential for a range of renewable energy solutions and for proposals for residential development in particular to be accompanied by a 'Renewable Energy Generation Plan' (REGP) setting out measures that will be incorporated into the design, layout and construction aimed at maximising energy efficiency and the use of renewable energy. The REGP must demonstrate how different measures have been considered and incorporated which could and should include:

- Triple Glazing;
- Solar Roof Panels or Solar Tiles;
- Air Source Heating Systems;
- Ground Source Heating Systems; Super Insulation (walls and loft void)
- Rainwater Capture System;
- Electric Vehicle Rapid Charging Points (provided to an individual dwelling or
- through and appropriate communal facility);
- Superfast Broadband and a flexible space within each home to enable home
- working and a reduction in the need to travel;
- Mechanical Heat Recovery Ventilation
- Solar Thermal Systems;
- Solar and Battery Storage Systems; and where appropriate
- Any other newer or alternative technologies and measures aimed at maximising
- energy efficiency and the use of renewable energy.

16.4 The Council is particularly supportive of the use of Solar Panels and will expect them to be incorporated into new development wherever possible and practicable. To maximise the effectiveness of Solar Panels, buildings should be planned and orientated to have a strong southerly aspect and for the south side of pitched roofs to be rectilinear and uncluttered. Dormer Windows, hipped roofs and corner tower elements should be confined to the northern side of pitched roofs.

16.5 Given the importance of tackling climate change and promoting renewable energy and energy efficiency measures and the rapid speed in which technology is evolving and improving, the Council may provide further guidance in the form of a Supplementary Planning Document (SPD) to assist in the implementation of Policy PPL10, which can be updated as necessary to future changes in approach.

Policy PPL 10

RENEWABLE ENERGY GENERATION AND ENERGY EFFICIENCY MEASURES

Proposals for renewable energy schemes will be considered having regard to their scale, impact (including cumulative impact) and the amount of energy which is to be generated.

All development proposals should demonstrate how renewable energy solutions, appropriate to the building(s) site, and location have been included in the scheme and for new buildings, be designed to facilitate the retro-fitting of renewable energy installations.

For residential development proposals involving the creation of one or more dwellings, the Council will expect detailed planning applications to be accompanied by a 'Renewable Energy Generation Plan' (REGP) setting out the measures that will be incorporated into the design, layout and construction aimed at maximising energy efficiency and the use of renewable energy.

Planning permission will only be granted where the applicant can demonstrate that all reasonable renewable energy and energy efficiency measures have been fully considered and, where viable and appropriate, incorporated into the design, layout and construction. The Council will consider the use of planning conditions to ensure the measures are delivered.

Nothing in this policy diminishes or replaces the requirements of Energy Performance Certificates (EPC) and Standard Assessment Procedures (SAP) for constructed buildings and compliance with the relevant building regulations.

This Policy contributes towards achieving Objectives 6 and 9 of this Local Plan.

Appendix – 17

17 Sustainable Transport and Accessibility

17.1 The National Planning Policy Framework promotes sustainable transport solutions. It states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice over how to travel. The Council will work with its partners, including Essex County Council, bus and train operators and the development industry, to improve accessibility, promote sustainable means of transport and reduce dependence upon private car transport.

17.2 To achieve sustainable communities, homes, jobs, services and facilities should, ideally, be accessible by a variety of different modes of transport, including: walking; cycling; and public transport – not just private cars. Locating development in accessible places gives people the option to use more sustainable modes of transport, which contribute less to global warming, and benefits those members of society who do not have access to a car. Additionally, there are public health and safety benefits to walking and cycling.

17.3 The Essex Transport Strategy (2011) is the Local Transport Plan (LTP) and includes Tendring District within the 'Haven Gateway'. It sets out the transport priorities for the area, which include 5 key outcomes to be achieved:

1. Provide connectivity for Essex communities and international gateways to support sustainable economic growth and regeneration;

2. Reduce carbon dioxide emissions and improve air quality through lifestyle changes, innovation and technology;

3. Improve safety on the transport network and enhance and promote a safe travelling environment;

4. Secure and maintain all transport assets to an appropriate standard and ensure that the network is available for use; and

5. Provide sustainable access and travel choice for Essex residents to help create sustainable communities. The Local Transport Plan (LTP) is supported by a suite of more specific documents including the Bus Strategy, the Cycling Strategy, the Sustainable Modes of Travel Strategy, and implementation plans that are also periodically updated by Essex County Council.

17.4 To reduce greenhouse gas emissions, the Council will support development which uses sustainable modes of transport. Whilst most journeys are made by road, Tendring District is served by 14 railway stations, providing a range of electrified London main line and local branch line services, with regular services from Clacton, Walton and Harwich/Dovercourt to the Colchester railway stations and beyond. The railway is important as both a public transport mode which can provide a sustainable alternative to private car use for work and leisure purposes and an alternative to HGV use for freight transport to and from Harwich International Port.

17.5 The Council will support and encourage measures which will make rail use a more attractive and sustainable alternative to the use of private cars for both local journeys and longer commutes and to the use of HGVs for freight transportation. The Council will work with Network Rail to improve rail connectivity in the context of their Industrial Rail Strategy/Route Strategy. Specific infrastructure projects will be integrated into the Infrastructure Delivery Plan.

17.6 The main urban areas within the District are located along the coastal fringes and the area has a strong rural heartland where the main means of sustainable transport is by bus. Local buses running

within and between settlements are crucial to providing access to jobs and services for many people in towns, villages and rural areas.

17.7 The Council will work with Essex County Council and bus operators to ensure coverage across the District, improve services and frequency and seek opportunities to improve bus-stop facilities and provide additional services to support new major development.

17.8 Cycling and walking should also be seen as transport modes in their own right and an integral part of the transport network. Increasing the options for travelling by those modes can benefit both the environment and public health, reducing pollution and increasing fitness levels. In this way, planning and transportation outcomes can help to support the wider health and wellbeing agenda. Many car journeys are over short-distances which could be travelled on foot or by cycle if these are attractive options, possibly as part of longer journeys.

17.9 Proposals for new development will be required to take account of the need to ensure accessibility, having regard to its location in relation to existing services and facilities, and by providing safe pedestrian and cycle connections to existing networks. As the Tendring District is mainly rural, reliance upon private cars will be inevitable to some extent within its remoter parts. However, the Council will require that measures for sustainable travel at all new developments are investigated and implemented where practicable.

17.10 As the Highway Authority for the area, Essex County Council is a consultee in regard to many planning applications. New developments will be required to be acceptable in terms of highway capacity, safety and convenience and to meet the requirements for access and parking which are contained in the latest version of the Essex County Council Development Management Policies, Travel Plan and Parking Standards, or equivalent amended or replacement policies or standards, or any overriding policies in this Local Plan, along with relevant Essex Accessibility strategies and Design guides. To be sustainable, developments should also be accessible by public transport, cycling and walking.

17.11 Parking standards can support measures which promote sustainable transport choices and help to protect amenity. The Council will work with Essex County Council to ensure that local parking standards are fit for purpose and that its assessment of planning applications takes account of factors such as: the accessibility of development, the type, mix and use of development; the availability of and opportunities for public transport.

Policy CP 1

SUSTAINABLE TRANSPORT AND ACCESSIBILITY

Proposals for new development must be sustainable in terms of transport and accessibility and therefore should include and encourage opportunities for access to sustainable modes of transport, including walking, cycling and public transport. Providing options for non-motorised vehicles is especially important for the large-scale developments at Clacton and the Tendring Colchester Borders Garden Community.

Planning applications for new major development likely to have significant transport implications will normally require a Transport Statement. If the proposal is likely to have significant transport implications or a Transport Assessment, the scope of which should be agreed in advance between the District Council and the applicant, in consultation with Essex County Council as the Highway Authority. In order to reduce dependence upon private car transport, improve the quality of life for local residents, facilitate business and improve the experience for visitors, all such applications should include proposals for walking and cycling routes and new or improved bus-stops/services.

Where relevant, improvements to railway station passenger facilities should be included and greater connectivity between places and modes of transport demonstrated.
Travel Plans and Residential Travel Information Packs should be provided as appropriate and in accordance with Essex County Council published guidance.
The Essex Cycling Strategy will be used as a guide to ensure the provision of appropriate cycling infrastructure.
This Policy contributes towards achieving Objectives 4 and 6 of this Local Plan.

Appendix – 18

18 Improving the Transport Network

18.1 An efficient and effective strategic transport network is critical for achieving economic growth, supporting trade and attracting inward investment, and reducing carbon emissions to help to reduce increases in global warming. Conversely, a network which is unsafe, slow or inconvenient can deter business investment and could harm the area's tourist economy, which attracts many thousands of visitors, particularly during the main summer holidays.

18.2 The Council will work with its partners, including Highways England, Essex County Council, bus and train operating companies, Network Rail and landowners, to safeguard and to explore opportunities to improve the District's strategic transport network. It will seek to make the transport network safer and more efficient, in order to: facilitate growth, trade and inward investment; help to improve the quality of life for local residents; and improve the experience for visitors to the District and will encourage improvements to the quality and frequency of rail and bus services and station facilities and their appearance.

18.3 The major roads forming part of the District's strategic transport network are the A120 and A133. Both routes include sections which require upgrading in order to improve safety and convenience and to function efficiently in the context of significant future housing growth. For the A133, between Colchester and Clacton, the Council will work with Essex County Council (the Highway Authority) to identify the nature and cost of improvements needed, seek sources of public funding and consider the use of the Community Infrastructure Levy (CIL) to secure contributions towards these works. An upgrade of the A120 is a requirement of the planned port expansion at Bathside Bay, Harwich although this is not expected to take place early in the plan period. The Council will work with Highways England and other partners to investigate ways of funding and delivering possible early improvements and will resist any development proposals in the vicinity of the A120 which could jeopardise its upgrading, widening or re-routing.

18.4 Major growth areas in West Tendring/East Colchester and Clacton will require new strategic highway and public transport infrastructure, which will not only serve the development areas themselves but also provide for two major new roads, to ensure that traffic is able to move through and between settlements efficiently, thereby helping to ease traffic congestion that otherwise would occur. A strategic link road between the A120 and A133 and Rapid Transit System will be required to support the Tendring Colchester Borders Garden Community. Strategic access improvements will be required in Clacton to connect the A133 to the western area of the town improving accessibility and circulation around the town and supporting further planned growth. The agreed route and specification of this connection/s (including for public transport and active travel) will be subject to further transport planning and assessment with Essex County Council and its planning and delivery detailed in future plans.

18.5 The Council will explore, in partnership with Essex County Council, Suffolk County Council, Babergh District Council and Network Rail, opportunities to improve the A137 and railway crossing/underpass at Manningtree Station. Any new developments likely to increase use of this route may be required to contribute towards such improvements.

Policy CP 2

IMPROVING THE TRANSPORT NETWORK

- Proposals for new development which contribute to the provision of a safe and efficient transport network that offers a range of sustainable transport choices will be supported. Major development proposals should include measures to prioritise cycle and pedestrian movements, including access to public transport.
- The Tendring Colchester Borders Garden Community will require a strategic link road between the A120 and A133 and a Rapid Transit System to support the new Garden Community. These infrastructure works have secured funding from the Housing Infrastructure Fund and are currently subject to further and more detailed planning and delivery. Further transport assessment work will be undertaken by Essex County Council (the highway authority) and Tendring District Council to identify the optimal route, specification and design of access improvements (including public transport and active travel) to Clacton from the A133 to the western side of the town. This will improve existing accessibility and support new growth areas and future development.
- Proposals will not be granted planning permission if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe.

This Policy contributes towards achieving Objectives 4 and 6 of this Local Plan.

Appendix – 19

19 Delivering Infrastructure

19.0.1 This chapter explains how the policies and proposals within this Local Plan will be implemented, how the Council will monitor their effectiveness in bringing positive changes to the District, how the Council may use its enforcement powers to deal with unauthorised development and how the Council may choose to review the Local Plan to respond to changes in the economy and deal with longer-term development requirements.

19.1 Implementation

19.1.1 This Local Plan will form the 'Development Plan' for the District against which all applications for new development will be judged. The Council will use the Local Plan in determining planning applications alongside the National Planning Policy Framework and will take into account any other material considerations.

19.1.2 The implementation of the policies and proposals detailed within this Local Plan will be achieved in a variety of ways. As the Local Planning Authority, Tendring District Council will play a key role. However, the Council will also work with a number of bodies to ensure the implementation of this plan in an integrated and efficient way.

19.1.3 The National Planning Policy Framework emphasises that plans must be deliverable. Local Planning Authorities need to demonstrate, within reason, that infrastructure is provided to support the delivery of the development planned. The infrastructure planning process seeks to:

- identify infrastructure needs and costs (including where possible phasing of development, funding sources and responsibilities for delivery);
- improve lines of communication between key delivery agencies and the Local Planning Authority, including identifying opportunities for integrated and more efficient service delivery and better use of assets;
- provide evidence for the setting of a Community Infrastructure Levy (CIL);
- be a 'live' document that will be used as a tool for helping to deliver infrastructure; and
- set out a process for policy monitoring and review.

19.1.4 In order to ensure that new development delivers sustainable communities, the facilities and service needs must be planned for and monitored. A document called the 'Tendring - Infrastructure Delivery Plan' sits alongside this Local Plan. It reviews Tendring's infrastructure needs for the plan period to 2033. Monitoring of the Local Plan is carried out (at least) annually, through the 'Tendring District – Authority Monitoring Report'.

19.1.5 The following organisations will be involved in the implementation of this Local Plan:

Table 19.1 Implementation

Organisation	Involvement in the Implementation of this Local Plan
Tendring District Council Braintree, Chelmsford, Colchester, Essex and Tendring Councils	• Determining planning applications in accordance with the Local Plan and any other material considerations. • Preparing and implementing Supplementary Planning Documents and design briefs. • Publishing of registers, schedules, leaflets etc. as appropriate and as resources permit. • Responding to suspected breaches in planning control, investigating alleged cases of unauthorised development and taking action where appropriate. • Liaising and co-operating with statutory undertakers, including Essex County Council as the Highways and Transport Authority and other appropriate agencies (including those listed below) to aid the integration of services and facilities and to ensure sustainable development. • Ensuring evidence across the Housing Market Area is up to date. • Facilitating growth through Local Delivery Vehicles as appropriate. • Preparing joint Development Plan Documents, Masterplans, Supplementary Planning documents as appropriate.
Essex County Council (ECC)	• Road and transport matters as the Highways and Transport Authority, including the provision of new facilities, on-street parking, road closures, highway safety and other traffic management. • Education and Social Services. • Minerals and waste management as the Minerals and Waste Planning Authority and the Waste Disposal Authority. • Liaising with TDC to aid the integration of services between the two authorities. • Lead Local Flood Authority. • Lead advisors on Public Health.
Public utilities including: British Gas, electricity providers, British Telecommunications plc and Anglian Water	• Taking account of the proposals within this Plan in the provision of their services and facilities, which are essential to sustainable, well planned developments. • Liaising with TDC regarding their proposals.
Health authorities including the North East Essex Clinical Commissioning Group and any future health bodies	• The provision of health facilities in the District. • Liaising with TDC regarding the various proposals for new facilities in the District.

Organisation	Involvement in the Implementation of this Local Plan
Environment Agency	• The protection and improvement of the environment. • Controlling pollution. • Implementing environmental legislation. • Regulating the environmental effects of industry. • Advice and guidance as statutory consultee to the local planning authority. • Advice and guidance in relation to drainage and flood protection implications of new development.
Highways England	• Improvements / new connections to the A120.
Network Rail	• Implementation of rail infrastructure. • Liaising with TDC regarding their proposals.
Conservation Organisations including Historic England, Natural England and others	• The protection and improvement of the historic / natural environment. • Implementing historic / natural environment legislation. • Advice and guidance in relation to listed buildings, conservation areas and other heritage assets / environmental designations and other important habitats.
Town and Parish Councils	• Providing and managing recreation and community facilities. • Providing an important link between the local community and TDC.
The Private Sector	• Majority of development carried out during the Local Plan period, including development of new residential properties, new employment and commercial development, and tourist and leisure facilities.

19.1.6 The Local Planning Authority appreciates that the delivery of new homes and jobs needs to be supported by necessary infrastructure, including a wide range of transport options, utilities, and community facilities. Throughout the consultation of this Local Plan, this issue has been of particular concern to our residents and businesses. The Local Planning Authority has commissioned an Infrastructure Delivery Plan (IDP), to inform the Local Plan, based on other evidence work; studies prepared for the Garden Communities; relevant, topic based national and local studies; and discussions with infrastructure providers. The IDP will sit alongside this Plan and provide specifics on the main items of infrastructure required for larger sites, when they are likely to be provided and who will pay for them. Additionally, the policies within Chapter 9 of this Plan highlight essential pieces of site specific infrastructure as relevant for certain sites.

The broad categories of necessary infrastructure covered in the IDP include:

- Water and drainage - water supply, waste water, flood risk management and resilience, and water quality.

- Energy - electricity, gas and renewable energy.
- Communications - broadband coverage and provision.
- Leisure and green infrastructure - sport, open space and community facilities.
- Education - early years and childcare, primary, secondary, further education, and higher education.
- Health - hospitals, health centres, GP surgeries, dentists, public health and preventative health care.
- Transport - highways, cycle and pedestrian facilities, rail, bus, park and ride, travel management and car parking.

19.1.7 Infrastructure and community facilities are mainly provided by partner agencies and service providers, such as water and energy provision by the utility companies; highways and social services by Essex County Council; education by a range of public and private sector providers; healthcare services and facilities by the North East Essex Clinical Commissioning Group and National Health Service England Midlands and East (NHSE) England. The IDP identifies the different investment and development time scales for these providers allowing us to work with them to help deliver a co-ordinated approach to new infrastructure delivery.

19.1.8 Telecommunications and digital infrastructure technologies are evolving rapidly, and proposals will need to enable sites to access high quality digital infrastructure including fibre and wireless services (5G and Long Term Evolution i.e. successor technologies) which are accessible from a range of providers.

19.1.9 Developers will be expected to contribute towards meeting appropriate infrastructure costs, having regard to overall consideration of viability. This will include contributions to both on-site costs and strategic off-site infrastructure costs. Contributions will be secured under S106 of the Town and Country Planning Act 1990 (as amended) and/or secured through a Community Infrastructure Levy (CIL) as appropriate. CIL will complement and not duplicate planning obligations. A CIL charging schedule linked to this Plan would stipulate a charge, per square metre of gross internal floorspace, for relevant classes of development. A proportion of CIL funds would be passed to Parish/Town councils.

19.1.10 In the event that essential infrastructure cannot be appropriately delivered to support new development despite best efforts to secure it, this policy will be used to restrict development from being commenced or, in certain cases, from being permitted, in the absence of proven infrastructure capacity. When infrastructure cannot be provided within, or is not appropriate to be located on, the development site itself, developers will be expected to make a contribution to the cost to provide what is necessary to support new development.

19.1.11 Policy DI1 below sets out generic infrastructure requirements for new development within the District.

Policy DI1

INFRASTRUCTURE DELIVERY AND IMPACT MITIGATION

All new development should be supported by, and have good access to, all necessary infrastructure. Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity, as is required, will prove sustainable over time both in physical and financial terms. Where a development proposal requires additional infrastructure capacity to be deemed acceptable, mitigation measures must be agreed with the Local Planning Authority and the appropriate infrastructure provider. Such measures may include (not exclusively):

a. financial contributions towards new or expanded facilities and the maintenance thereof;
b. on-site construction of new provision;
c. off-site capacity improvement works; and/or
d. the provision of land.

Developers will be expected to contribute towards the delivery of relevant infrastructure. They will either make direct provision or will contribute towards the provision of local and strategic infrastructure required by the development either alone or cumulatively with other developments. Developers and land owners must work positively with the Local Planning Authority, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with published policies and guidance. Exceptions to this policy will only be considered whereby:

a. it is proven that the benefit of the development proceeding, without full mitigation, outweighs the collective harm;
b. a fully transparent, open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum appropriate level of developer return and land owner receipt necessary for the development to go ahead, having regard to Planning Practice Guidance and noting that this will be lower for any affordable portion of the development,
c. full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and
d. obligations are entered into by the developer that provide for appropriate additional mitigation in the event that viability improves prior to completion of the development.

The Council may consider introducing a Community Infrastructure Levy (CIL) and may implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL. For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this plan.

This Policy contributes towards achieving Objective 4 and 5 of this Local Plan.

THE NATIONAL GRID COMPANY plc

NGC SUBSTATIONS AND THE ENVIRONMENT: GUIDELINES ON SITING AND DESIGN

Section 1 INTRODUCTION

1 The National Grid Company plc's (NGC's) policy statement on the environment recognises the importance of giving due regard to protecting and enhancing the environment and taking into account the environmental effects of the Company's actions. The Company has statutory duties in relation to preservation of amenity under Schedule 9 of the Electricity Act 1989, and has published a Schedule 9 Statement setting out the manner in which it proposes to meet these duties.

2 NGC has a statutory duty under the Act to develop and maintain an efficient, co-ordinated and economical transmission system of electricity for England and Wales. New transmission lines, new substations, sealing end compounds, line entries, additions and extensions to existing substations may be required to provide new connections for customers or reinforcement of the national grid system arising from changes in the demand for and generation of electricity.

3 This document explains the approach NGC takes towards such developments (Section II) and contains Guidelines (Section III) to assist those responsible for siting and designing substations to mitigate the environmental effects of such developments and so meet the Company's policy. The document complements the Company's Holford Rules guidelines on the routeing of high voltage transmission lines and when appropriate should be used in conjunction with them.

4 The guidelines are to be used by NGC staff, their consultants, and contractors in the siting and design of new substations and extensions to substations. They reflect the criteria the company requires its staff, consultants and contractors to satisfy.

5 As recognised in its Schedule 9 Statement NGC places importance on consultation with statutory planning and amenity bodies over its proposals for new developments. NGC believes that the availability of these guidelines will assist in such discussions by referring to the main considerations relevant to substation siting, and will thereby assist in achieving the most appropriate siting and design solutions.

Section II NGC'S APPROACH TO DESIGN AND SITING OF SUBSTATIONS

Approach to the Environment

6 NGC's environmental policy recognises the importance of giving due regard to protecting and enhancing the environment and taking into account the effect on the environment of all the Company's actions. Following the principle of integrating environmental considerations into all its activities, NGC seeks to keep known adverse effects on the environment to a reasonably practicable minimum and, in accordance with its duties under Schedule 9 of the Electricity Act, the Company gives due regard to the preservation of amenity and takes reasonable steps to mitigate the effects of its relevant proposals. To achieve these aims the Company therefore has to balance technical, economic and environmental considerations to reach reasonably practicable development proposals.

7 The guidelines (Section III) deal with the amenity issues associated with the siting and design of new substations and major extensions or major modifications to existing substations. They cover a range of key issues from the time options are initially considered to final design, including form, silhouette and colour of the entire development in relation to the surrounding area, and also related issues such as overhead line entries, since these are dominant features in any substation.

Environmental Report

8 In order to achieve these objectives, the environmental effects of new substations and extensions or modifications to existing substations will be assessed and where appropriate an environmental report prepared describing the effects and mitigative measures. Items to be considered are summarised in Appendix A.

Integrating Environmental Considerations into Power System Planning

9 The nature of transmission system planning is such that scheme proposals and options may go through various stages before it is finally decided to proceed with construction.

10 The purpose of each proposal for substation, sealing end compound or line entry development should be set out in a brief, and a range of system and siting options should be evaluated and documentated as part of the selection of the preferred solution. In each case the effects of the overall development on the environment should be assessed, prior to a commitment to a particular site or design.

11 When it is clear a project is likely to proceed, an assessment should be made of any additional skills required to deal effectively with the range of environmental, land use, planning and design issues. Consideration should also be given to consultation as soon as reasonably possible with appropriate statutory planning and amenity bodies.

Liaison with other Electricity Companies

12 NGC will encourage and recommend other parties such as power generators or regional electricity companies to adopt these guidelines when

working with NGC on proposals for substations, sealing end compounds or line entries.

Post Construction Review

13 Following completion of the project, a review should be undertaken to check that the necessary measures identified in the environmental report have been implemented.

Section III GUIDELINES

Overall System Options and Site Selection

1 In the development of system options including new substations, consideration must be given to environmental issues from the earliest stage to balance the technical benefits and capital cost requirements for new developments against the consequential environmental effects in order to keep adverse effects to a reasonably practicable minimum.

Amenity, Cultural or Scientific Value of Sites

2 The siting of new NGC substations, sealing end compounds and line entries should as far as reasonably practicable seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections.

- ***Notes:***

  1 Internationally and nationally designated areas of highest amenity, cultural or scientific value are:

  National Parks;
  Areas of Outstanding Natural Beauty;
  Heritage Coasts;
  World Heritage Sites;
  Ramsar Sites;
  Sites of Special Scientific Interest;
  National Nature Reserves;
  Special Protection Areas;
  Special Areas of Conservation.

  2 Care should be taken in relation to all historic sites with statutory protection eg Ancient Monuments, Battlefields and Listed Buildings.

  3 Account should be taken of Government Planning Policy Guidance and established codes of practice.

  4 Account should be taken of any development plan policies relevant to the siting or design of substations.

3 Areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas

should be protected as far as reasonably practicable.

Local Context, Land Use and Site Planning

4 The siting of substations, extensions and associated proposals should 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.

- ***Notes:***

  1 *A preliminary study should be undertaken to identify the extent of land required to meet both operational and environmental needs.*
  2 *In some instances it may be possible to site a substation partially or fully enclosed by existing woodlands.*
  3 *Topographical information should be obtained at an early stage. In some cases a geotechnical survey may be required.*

5 The proposals should keep the visual, noise and other environmental effects to a reasonably practicable minimum.

- ***Notes:***

  1 *Allow sufficient space for screening of views by mounding or planting.*
  2 *Consider appropriate noise attenuation measures where necessary.*
  3 *Use security measures which minimise visual intrusion from lighting.*
  4 *Consider appropriate on-site water pollution prevention measures.*
  5 *Consider adjoining uses and the amenity of local inhabitants.*

6 The land use effects of the proposal should be considered when planning the siting of substations or extensions.

- ***Notes:***

  1 *Issues for consideration include potential sterilisation of nationally important land, eg Grade 1 agricultural land and sites of nationally scarce minerals.*
  2 *Effects on land drainage.*

Design

7 In the design of new substations or line entries, early consideration should be given to the options available for terminal towers, equipment, buildings and ancillary development appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum.

- ***Notes:***

  1 *With outdoor equipment, a preference should be given normally to a low profile design with low height structures and silhouettes*

appropriate to the background.

2 *Use lightweight narrow section materials for taller structures especially for gantries over about 6 metres in height.*

3 *Commission exterior design and colours appropriate to the surroundings.*

4 *Materials and colours for buildings, equipment and fencing should be chosen to harmonise with local surroundings.*

5 *Where possible avoid the use of prominent insulators by consideration of available colours appropriate to the background.*

6 *Where possible site buildings to act as visual screens for switchgear.*

7 *Ensure that the design of high voltage and low voltage substations is co-ordinated by early consultation between NGC and its customers.*

8 *Where there are particular technical or environmental constraints, it may be appropriate to consider the use of Gas Insulated Switchgear (GIS) equipment which occupies less space and is usually enclosed within a building.*

9 *Early consideration should be given to the routeing of utility service connections.*

8 Space should be used effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation.

- ***Notes:***

1 *Assess the benefit of removing redundant substation equipment from existing sites where this would improve their appearance.*

9 The design of access roads, perimeter fencing, earthshaping, planting and ancillary development should form an integral part of the site layout and design to fit in with the surroundings.

<u>Line Entries</u>

10 In open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines so as to avoid a confusing appearance.

11 The inter-relationship between towers and substation structures and background and foreground features should be studied to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal towers on prominent ridges should be minimised by siting towers against a background of trees rather than open skylines.

END

APPENDIX A

NGC SUBSTATIONS – ENVIRONMENTAL REPORT

Introduction

All proposals for significant extensions of existing substations or for new substations and associated development should be the subject of an environmental appraisal and an environmental report should be produced. The project manager will be responsible for ensuring that an appropriate appraisal is undertaken and report prepared, with due regard to expert advice available to the team.

For a major development a scoping exercise should be undertaken with the contribution of appropriate skills to establish the range and depth of the appraisal. It will generally be appropriate at this stage to consider consultation with the local planning authority.

A clear distinction should be drawn between the preparation of an environmental report which will be undertaken in most cases and a full environmental statement (ES) which may on occasion be required under UK environmental assessment legislation, for example where the substation forms part of a major new power station for which an ES may be needed.

Recommended Content of Environmental Reports for Substations

Section 1

Information describing the project during construction, when operational and on de-commissioning including:-

1.1 Purpose and physical characteristics of the project, including details of access and transport arrangements and employment.

1.2 Land use requirements and other physical features of the project.

1.3 Operational features of the project and relevant measurements of emissions such as noise, vibration, light, heat and electric and magnetic fields.

1.4 Main alternative sites considered and reasons for final choice.

Section 2

Information describing the site and its environment including:-

2.1 Physical features such as

-Flora and fauna
-Soil: agricultural quality, geology
-Water courses including land drainage generally
-Climatic factors

-Historic heritage and archaeological sites
-Landscape and topography
-Local recreational uses
-Proximity of population and any other relevant environmental features.

2.2 The policy framework

The policy framework including all relevant statutory designations such as national nature reserves, sites of special scientific interest, national parks, areas of outstanding natural beauty, heritage coasts, special protection areas, special areas of conservation, regional parks, country parks, national forest parks, local nature reserves, areas affected by tree preservation orders, water protection zones, minerals protection zones, nitrate sensitive areas, conservation areas, listed buildings, scheduled ancient monuments, and designated areas of archaeological importance. It should also include references to Structure, Unitary and Local plan policies applying to the site and the surrounding area which are relevant to the proposed development as well as to any international designations.

Section 3

Assessment of effects on the surrounding area and landscape including:-

3.1 Visual effects, emissions during normal operation, noise, light, impact on local roads and transport.

3.2 Effects of the development on buildings, the architectural and historic heritage and archaeological features.

3.3 Loss of, and damage to flora, fauna and geology.

3.4 Land use/resource effects such as
- quality and quantity of agricultural land to be taken
- sterilisation of mineral resources and alternative uses of the site.

3.5 Changes to hydrographic characteristics.

3.6 Air and Climate

3.7 Indirect matters such as
- traffic (road, rail, air, water) related to the development,
- development associated with the project, eg new roads, sewers, power lines, pipelines, telecommunications etc.

Section 4

Mitigation measures

4.1 Where significant adverse effects are identified, a description of the measures to be taken to avoid, reduce or remedy those effects, eg

a) site planning;

b) technical measures eg equipment selection, recycling of waste or redundant parts, pollution control and treatment, containment (eg shielding of transformers and bunding)

c) aesthetic and ecological measures eg
   - mounding, design, colour, landscaping, tree planting
   - measures to preserve particular habitats or create alternative habitats
   - recording of archaeological sites
   - measures to safeguard historic buildings or sites.

END