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Norwich to Tilbury

Volume 8: Examination Documents

**Document: 8.4.7 Applicant's Comments on any Further Information
or Submissions Received by Deadline 1**

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1. Introduction

1.1 Purpose of the Document

- 1.1.1 A number of additional submissions were accepted into the examination in advance of Deadline 1. The Applicant submitted a response at Deadline 1, **8.4.4 Applicant's Comments on any Further Information/Additional Submissions Accepted by the ExA [REP1-135]**.
- 1.1.2 At paragraph 1.1.6 of that document it was stated '*Ardleigh Parish Council submitted two documents which were published on 29 January 2026. There is a submission document [AS-064] and a "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh" [AS-065]. These are under review and it is expected that the Applicant will respond at Deadline 2*'.
- 1.1.3 This document provides the Applicant's response to the main points made in those documents.

2. Applicant’s Responses to an Additional Submission on Behalf of Ardleigh and Little Bromley Parish Councils

2.1 Introduction

2.1.1 Table 2.1 summarises the Applicant’s responses to an Additional Submission on Behalf of Ardleigh and Little Bromley Parish Councils [AS-064].

Table 2.1 Applicant’s Responses to an Additional Submission on Behalf of Ardleigh and Little Bromley Parish Councils [AS-064]

Ref	Matter Raised	Applicant’s Comments
9	Part 5 of EN-1 requires consideration of “generic impacts” including effects on human health, safety, amenity, community wellbeing and emergency response capacity. Structured reference: EN-1 §5.1–§5.4 (Generic impact assessment including human health and safety).	<p>EN-1 identifies an urgent national need for electricity infrastructure, which is required in the national interest to be delivered as soon as possible. Electricity infrastructure of the type proposed is critical national priority infrastructure, which is so urgent and important it should be progressed as quickly as possible.</p> <p>EN-1 confirms that such energy infrastructure is required to ensure the UK can provide a secure, reliable, and affordable supply of energy, while also meeting our decarbonisation targets. Section of EN-1 also confirms there is:</p>
10	Accordingly, even where national need is accepted, and the presumption in favour of granting consent arises, EN-1 requires that impacts and risks be weighed in the planning balance. Where risks to public safety, emergency response capacity or resilience of critical electricity infrastructure remain unassessed or insufficiently mitigated, these risks disengage the presumption in favour of a grant of consent.	<ul style="list-style-type: none"> • the need for security of supply (energy independence of supply due to geo-political uncertainty is critical during heightened security-of-supply exposure post Ukraine and Iran) • the need to meet the decarbonisation challenge in the UK (aside from the main Net Zero policy); and • the need to deliver economic growth which is one of the Government’s main agendas.

Ref	Matter Raised	Applicant's Comments
		<p>Section 3 of EN-1 confirms there is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives and substantial reinforcement is required in East Anglia:</p> <p>Paragraph 3.3.66 <i>'The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security.'</i></p> <p>Paragraph 3.3.68 <i>'The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require...substantial reinforcement in East Anglia to handle increased power-flows from offshore wind generation.'</i></p> <p>Paragraph 3.3.83 <i>'Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.'</i></p> <p>EN-1 further provides that there is a CNP for the provision of nationally significant low carbon infrastructure.</p> <p>Paragraph 3.3.63 of EN-1 confirms (emphasis added):</p> <p><i>'...the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.'</i></p> <p>The Applicant provides a summary of the planning balance in Chapter 8 of the 5.6 Planning Statement [APP-085] in accordance with the National Policy Statement (NPS) EN-1 and EN-5 framework, following a detailed assessment of the Project and its likely effects.</p>

Ref	Matter Raised	Applicant's Comments
		<p>Pursuant to paragraph 3.2.7 of NPS EN-1 (2024), substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance. Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085].</p> <p>EN-1 paragraph 4.1.7 provides '<i>... For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases</i>'. Paragraph 4.1.7 goes on to state that '<i>This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.</i>'</p> <p>5.6 Planning Statement [APP-085] shows that none of the exceptions to the presumption in paragraph 4.1.7 of NPS EN-1 apply in this case. The need for the Project is clear and urgent and effects have been mitigated through the mitigation hierarchy. It is the Applicant's case that the need and benefits of the Project significantly outweigh the residual effects and that the CNP policy is engaged.</p> <p>The Applicant considers that the substantial need for the Project is clear and urgent and the mitigation hierarchy has been applied, all in accordance with EN-1 and EN-5.</p>

Ref	Matter Raised	Applicant's Comments
11	<p>CNP</p> <p>If it is considered that the Norwich–Tilbury scheme qualifies for CNP status under EN1 and EN-5, that status does not displace the EN-1 Part 4 and Part 5 duties to assess and mitigate safety, emergency-response and resilience risks. Per 4.1.7 of EN-1: “...For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.” (emphasis added)</p>	<p>The Project is critical national priority infrastructure. Paragraph 2.12.7 of NPS EN-5 (2024) states that: ‘<i>As highlighted in EN-1 government has concluded that there is a CNP for the provision of nationally significant low carbon infrastructure. This includes for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. This includes infrastructure identified in the Holistic Network Design and subsequent strategic network design exercises...</i>’</p> <p>Reflecting the level and urgency of need for energy infrastructure, paragraph 4.1.3 of NPS EN-1 states that the Secretary of State should start with a presumption in favour of granting consent to applications for energy NSIPs. The presumption applies unless any more specific and relevant policies set out in relevant NPSs clearly indicate that consent should be refused, subject to the provisions of the Planning Act 2008.</p> <p>5.6 Planning Statement [APP-085] shows that none of the exceptions to the presumption in paragraph 4.1.7 of NPS EN-1 apply in this case. The need for the Project is clear and urgent and effects have been mitigated through the mitigation hierarchy. It is the Applicant’s case that the need and benefits of the Project significantly outweigh the residual effects.</p> <p>With regard to matters of safety, the Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.</p>

Ref	Matter Raised	Applicant's Comments
		<p>Given the nature of electricity transmission infrastructure compared to other types of infrastructure projects, the Project design is governed by statutory duties and obligations set out under the following regulations and legislation:</p> <ul style="list-style-type: none"> • Electricity Act 1989 – efficient, co-ordinated and economical • Transmission licence obligations – connections and security of supply • NETS SQSS – design safety standards • The Construction (Design and Management) Regulations 2015 • Health and Safety Legislation. <p>These design safety standards constitute an embedded mitigation measure (see 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]).</p> <p>The Applicant has provided a planning policy assessment against the following EN-1 assessment principles (Section 4 and Section 5 of EN-1) (see Chapter 7 of 5.6 Planning Statement [APP-085]):</p> <ul style="list-style-type: none"> • Environmental effects/considerations • Health • Safety • Security considerations • Civil and military aviation and defence interests. <p>The 5.6 Planning Statement [APP-085] provides a summary against critical national priority policy that confirms the Project will not present an unacceptable risk to, or unacceptable interference with, those receptors or factors identified in paragraphs 4.1.7 and repeated in 4.2.15 of NPS EN-1, namely:</p> <ul style="list-style-type: none"> • Human health and public safety • Defence • Irreplaceable habitats • The achievement of net zero

Ref	Matter Raised	Applicant's Comments
		<ul style="list-style-type: none"> Flood risk. <p>The need for the Project is urgent and would deliver improved energy security during heightened security-of-supply exposure post Ukraine and also Iran. The Project is a key part of a strategy for secure, clean and affordable British energy for the long term.</p>
19	<p>Clustering</p> <p>The Parish Councils consider that the Applicant has not presently assessed the cumulative effects arising from the co-location of multiple nationally significant energy projects in this location, either in terms of environmental effects or in terms of safety and resilience of clustered critical infrastructure.</p>	<p>As set out in the Applicant's comments on submissions received at Procedural Deadline A (document reference 8.4.6) the Applicant notes The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require the environmental assessment to identify, describe and assess, where relevant, the expected significant effects arising from the vulnerability of the proposed development to 'major accidents and disasters' (MAD).</p> <p>The EIA Scoping Report (see 6.19 Scoping Report [APP-296]) therefore identified and described the following potential MAD which could occur as a result of the Project, or arise from the surrounding environment and affect the Project:</p>
20	<p>The Report identifies that the co-location of high-voltage overhead lines, converter infrastructure, substations and BESS in the ALBA presents both local and national security risks, including vulnerability to hostile interference, cascading failure risk and operational disruption. The Report further notes that the proposed overhead line alignment encircling Ardleigh village centre introduces tall, visually prominent and physically exposed infrastructure crossing strategic transport corridors, thereby increasing exposure to security and safety hazards.</p>	<ul style="list-style-type: none"> Physical accident Electrical accident Fire/explosion Security threat External interference. <p>Whilst the Applicant recognises that these potential MAD could occur, the likelihood is so low that the risks are considered to be not significant.</p> <p>All potential effects were scoped out from further assessment as there are no likely significant effects as described in 6.19 Scoping Report [APP-296]. A standalone MAD chapter is therefore not included within Volume 6 Environmental Statement [APP-123 - APP-298].</p>
21	<p>These matters fall within EN-1 Part 5 considerations concerning human health, safety, emergency response and resilience of energy infrastructure, and within the exception in EN-1 §4.1.7 where residual impacts present unacceptable risk to public safety or defence interests.</p>	<p>The Project is designed to comply with design safety standards including the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) and the suite of National Grid policies and processes</p>

Ref	Matter Raised	Applicant's Comments
22	The Parish Councils submit that these risks have not been adequately assessed in the application documentation and require examination	<p>which contains details on design standards required to be met when designing, constructing, and operating its projects. These design safety standards constitute an embedded mitigation measure as reported in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130].</p> <p>Existing National Grid processes are designed to identify potential security and safety risks during construction and operation (and maintenance) (including risks from MAD) and to design these out at each stage of project development. This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing, and operating assets such as proposed on the Project.</p> <p>The Applicant notes the developer of the BESS site is required to submit a Fire Prevention Plan incorporating full details of fire suppression mechanisms for approval prior to operational use.</p>
24	<p>The Horlock Rules</p> <p>In their Relevant Representations, both Parish Councils raise the issue of the siting of the EACN and compliance with the Horlock Rules. The Report further sets out the Parish Councils' contentions that these rules have been breached (see the Report at Sections 8 and 11)</p>	<p>Good design of electricity transmission infrastructure is achieved by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (NPS EN-1 and EN-5) and the embedded environmental design mitigation as part of the Environmental Impact Assessment (EIA) process. Such good design principles are then intertwined with the technical design requirements alongside the regulatory and other constraints such as operational, safety and security requirements for new electricity transmission infrastructure.</p> <p>NPS EN-1 and, NPS EN-5 (both 2024) set out the requirement to deliver good design, and in developing the Project the Applicant has responded to the criteria by which it will be assessed, using the guidance of the Holford Rules and the Horlock Rules, in developing the Project. Document 7.15 Design and Access Statement [APP-353] sets out how the Project reflected the four principles of good design in the Planning Inspectorate's Advice on Good Design'.</p> <p>The Horlock Rules, devised by National Grid in (National Grid, 2006,) and which provide guidelines for the siting and design of new substations, or substation extensions. They also concern the siting of CSE compounds and</p>

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		<p>line entries. In summary, like the Holford Rules, they facilitate the consideration of environmental factors and amenity within the design and siting of new substation infrastructure.</p> <p>In overview, the Rules seek to reduce any adverse impacts associated with new overhead lines and substations through the adoption of a series of 'common sense' rules. The Horlock Rules, are identified in Chapter 5 of 7.15 Design and Access Statement [APP-353]. These seek to inform the routeing and siting decisions by guiding them away from areas which are considered to be of the highest amenity value, and encouraging particular design outcomes by maintaining as direct and straight an alignment as possible. It is clear from the caveats within the wording of different Rules, however, that balanced decision-making judgements are required on a case-by-case basis, informed by the unique circumstances of a location.</p> <p>The Applicant's position is that the consideration of the guidance in the Horlock Rules has been consistently applied with due regard to other relevant factors and respecting the flexibility inherently allowed for within the Rules.</p>
25	<p>Loss of BMV</p> <p>The Parish Councils wish to further draw the Examining Authority's attention to the national importance of agricultural land in this area. The Report explains that the proposed EACN site and associated cable routing would result in a significant loss of BMV, including Grade 1 land, thereby severely impacting active farming enterprises. (see Section 4 of the Report).</p>	<p>The Applicant notes that the site of the EACN substation is on land identified as being Grade 2 as presented in ES Figure 6.6 F3 Detailed Agricultural Land Classification Mapping [APP-143] and ES Appendix 6.1 Agricultural Land Classification Report [APP-139].</p> <p>Paragraph 5.11.12 of NPS EN-1 (DESNZ, 2024a) states that '<i>Applicants should seek to minimise impacts on best and most versatile [BMV] agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)</i>'.</p> <p>Paragraph 5.11.34 of NPS EN-1 (DESNZ, 2024a) requires the SoS to ensure '<i>applicants do not site their scheme on the best and most versatile agricultural land without justification</i>'. Paragraph 5.11.34 further adds: '<i>Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality</i>'</p>

Ref	Matter Raised	Applicant's Comments
		<p>The Project has sought to minimise impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. Given the predominance of BMV agricultural land within East Anglia, it has not been possible to avoid both temporary and permanent effects on this resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project.</p> <p>It is acknowledged that the Project will result in a loss of BMV land and is therefore contrary to NPS EN-1 paragraph 5.11.3 as well as the NPPF (MHCLG, 2025) and relevant local planning policy. The extent of BMV land across Norfolk, Suffolk and Essex significantly constrains the ability to avoid this particular resource. However, it is considered that the significant benefits arising from this CNP Infrastructure justify the permanent loss of BMV.</p>

3. Applicant’s Response to Comments received from Simon Bell on behalf of Ardleigh Parish Council and Little Bromley Parish Council

3.1 Introduction

3.1.1 Table 3.1 summarises the Applicant’s responses to comments received from Simon Bell on Behalf of Ardleigh Parish Council and Little Bromley Parish Council **[AS-065]**.

Table 3.1 Applicant’s responses to comments received from Simon Bell on Behalf of Ardleigh Parish Council and Little Bromley Parish Council **[AS-065]**

Ref	Matter Raised	Applicant’s Response
4	Impact on Agricultural Land	
4.6	Agriculture in the village would be severely affected by the proposals. For example, the land take on one farm from both overhead lines and underground cables would make the business completely unviable. Another farm, which is a highly successful fruit business supplying major UK supermarkets, anticipates that it would have to close with the loss of over 200 jobs due to the scale of disruption incurred during construction.	<p>Temporary disruption to farming operations during construction (including disruption from haul roads) would be reduced through good practice, such as: maintaining/providing alternative access and water supplies (including for irrigation systems), reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04, and AS05 within 7.2 Outline Code of Construction Practice [APP-300]). All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project (for example, in relation to temporary land take, reduced yields due to irrigation disruption, etc.).</p> <p>The Applicant recognises concerns that electricity infrastructure and associated rights may result in long-term restrictions on land use and agricultural productivity. In developing the Project, the Applicant has sought to minimise such effects by limiting permanent land acquisition.</p>

Ref	Matter Raised	Applicant's Response
		<p>The majority of affected agricultural land would remain in productive use following construction, subject only to proportionate restrictions that are typical for high-voltage transmission infrastructure, such as adhering to safety clearances.</p>
5	Impact on the Historic Environment	
5.5	<p>At the optioneering stage of the project, a very cursory assessment of the baseline historic environment would show that there was a risk of significant harm to high value heritage assets. The rich heritage of the area is well known, and readily available data shows a continuous chain of designated and non-designated heritage assets along the proposed cable route. The same applies to the proposed EACN sub-station site, where there is evidence of a junction between two Roman Roads as well as a lot of evidence of previous settlements.</p>	<p>The historic environment was considered in the environmental appraisal as set out in 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] and Strategic Options Backcheck and Review [APP-355]. 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208] provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. The Project would not result in any substantial harm to designated heritage assets.</p>
5.9	<p>The non-designated heritage assets map shown in Appendix C-4 also does not consider the additional assets highlighted by Ardleigh PC in its Statutory Consultation submission, as shown in the modified map in Appendix C-2. These are the Areas A & B, as identified in EAA Report 90 and additional information on the Roman Roads 3033/3035 and MEX9020 which intersect the proposed EACN site. (MEX9020 is the reference number used in the EACN Substation Geophysical Survey Report obtained by NGET.)</p>	<p>Areas A and B are covered by non-designated Historic Environment Record (HER) assets MEX8700 and MEX12738 respectively. These records were obtained from the Essex HER. Both are detailed on Figure A11.1.2 - Non-Designated Heritage Assets in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The baseline report includes a brief description of the archaeological remains recorded in EAA Report 90. The geophysical survey (6.11.A3 Environmental Statement Appendix 11.3 - EACN Substation Geophysical Survey Report [APP-211]) of the propose location of the new EACN Substation failed to identify any evidence of the Roman Roads, while the evaluation found only possible scant remains (6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213]).</p>
5.10	<p>There is a very high concentration of heritage assets in the Ardleigh Conservation Area (CA26). These include:</p>	<p>The approach to scoping listed buildings in or out of the assessment was developed in consultation with historic environment stakeholders, and in line with relevant national policy and guidance, including Historic England's</p>

Ref	Matter Raised	Applicant's Response
	<ul style="list-style-type: none"> • 17 Listed Buildings out of a total of 71 Listed Buildings in the Parish. One of these is the Grade II* Church of St Mary (1112060). The remaining 16 are Grade II. It is important to note that Figure 11.2 in National Grid's DCO application (APP-217) only shows 1 of the 17 listed buildings in the Ardleigh Conservation Area. • 19 Local List candidates. These are additional to the heritage assets identified in the Ardleigh Parish Council survey and are buildings in the Conservation Area that are proposed for Local List assessment in the Tendring District Council "Ardleigh Conservation Area Character Appraisal and Management Plan". The process of approving the Tendring District Local List is still ongoing, but, whatever the outcome, the attributes of these buildings and their contribution to the area has been established through an independent assessment process. The Ardleigh Conservation Area Character Appraisal and Management Plan was highlighted to NGET in Ardleigh PC's submission to the statutory consultation. 	<p>guidance on setting. The methodology is detailed in 6.19 Scoping Report [APP-288 to APP-296] and the final version agreed with stakeholders through thematic group meetings is set out in Annex E of 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Therefore, the methodology used to determine which heritage assets were taken forward for detailed assessment and which were reasonably scoped out is considered robust and proportionate.</p> <p>All non-designated heritage assets, including locally listed buildings, were assessed to determine their value in accordance with the 6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. Overarching National Policy Statement for Energy EN-1 (2024) paragraph 5.9.9 includes instructions regarding the Applicant's assessment: <i>'The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES'</i>, and in several places refers to detail being proportionate to the importance / significance of the heritage asset. The Applicant therefore considers that it has appropriately complied with relevant policy in NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets.</p> <p>The Ardleigh Conservation Area Character Appraisal and Management Plan (2023) was consulted to inform assessment. The 19 non-designated buildings are not referred to as local list candidates in the conservation area appraisal, although 16 buildings are named as non-designated heritage assets. Also, the buildings are not included in the sources agreed for collection of baseline data in the 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11 Environmental Statement Chapter 11- Historic</p>

Ref	Matter Raised	Applicant's Response
5.12	<p>In addition to impacting the heritage assets directly the Norwich to Tilbury proposals would also impact their curtilage and therefore further increase the harm caused. The Tendring District Council “Ardleigh Conservation Area Character Appraisal and Management Plan” for example refers to key views from the Conservation Area. This impact on these views is discussed in “Ardleigh PC submission to NG- Historic Environment” submitted for the Statutory Consultation in July 2024.</p>	<p>Environment [APP-208] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. However, the Applicant has reviewed these buildings and concluded that the local list candidates would be of low value in heritage terms. The majority of the local list candidates are also located outside the 250 m Study Area for non-designated assets and so would not have been included in the baseline, as per 6.19 Scoping Report [APP-288 - APP-296]. Any of the local list candidates that fall within the 250 m Study Area would not have had their settings assessed for the reasons set out in the paragraph above and therefore, there would be no significant effects on any of these assets.</p> <p>There would be no direct physical impacts on the listed buildings in the Ardleigh Conservation Area nor on their curtilages. For the purpose of historic environment impact assessment, the impact of the Project on heritage assets where there is no potential for physical harm is assessed through the change to the setting of each asset in terms of how that would affect its value. How the impact of the Project on the setting of heritage assets is assessed, is detailed in 6.19 Scoping Report [APP-288 – APP-296] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Descriptions of the setting of the Ardleigh Conservation Area and its listed buildings are detailed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP209]. The Applicant acknowledges that the settings of some designated assets fall partially within the Order Limits and this is assessed within 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The Project has also assessed the level of harm in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] on designated assets where land that forms part of the setting of designated assets falls within the Order Limits. The assessment has not concluded any substantial harm to heritage assets, although less than substantial harm has</p>

Ref	Matter Raised	Applicant's Response
		<p>been identified (as is common) for many types of developments and should be considered in the context of the planning balance of the benefits of the Project.</p> <p>The settings assessment as set out in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] was informed by a walkover survey of the conservation area and associated heritage assets, and with reference to relevant viewpoints and visualisations (6.11.F5 Environmental Statement Figure 11.5 - Historic Environment and LVIA Viewpoint Locations [APP220] and 7.12 Visualisations [APP-343- 351]).</p>
5.13	<p>It is DCO application National Grid has only supplied visualisations for one Historic Environment viewpoint in the Parish of Ardleigh, which is "HE25". This however shows that overhead lines would be visible from the centre on the Ardleigh Conservation Area (CA26) and from the Grade II* listed St Mary's Church (1112060). A section from the HE25 image is copied below, with an arrow added here (in orange) to show the overhead lines that would be introduced to the setting.</p>	<p>The Applicant acknowledges that the settings of some designated assets fall partially within the Order Limits. The impact of the Project on the settings of the conservation area and church were assessed in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208] and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). The setting assessment for both assets was informed by Historic Environment viewpoint HE25, 7.12 Visualisations - Part 9 of 9 [APP-351], by Landscape and Visual Impact Assessment viewpoint 3.11 (7.12 Visualisations - Part 3 of 9 [APP-345]) and also by a walkover of the settlement taking in numerous views into and out of the settlement and also between internal elements of the historic environment.</p>
5.14	<p>The prominence of the Grade II* listed St Mary's Church (1112060) in the landscape would be severely impacted by the overhead line that is proposed to surround it.</p>	<p>The Applicant acknowledges that the settings of some designated assets fall partially within the Order Limits. The impact of the Project on the setting of this asset was assessed in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208] and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition).</p> <p>6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] describes the setting of the asset. The Applicant considers that the assessment of permanent minor adverse significance of effect (not significant) for the asset (6.11.A2 Environmental Statement</p>

Ref	Matter Raised	Applicant's Response
5.16	St Mary's Church (1112060) is visible from many points around the village. Views both to and from the Church would be severely harmed by the proposed pylons, which would dominate the landscape around the village centre.	<p data-bbox="1003 185 2112 403">Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]), again for both assets, is appropriate as the rural landscape would remain in place beneath and around the proposed overhead line. For more detail on the assessment see the response to 5.16 below.</p> <p data-bbox="1003 432 2112 1018">Views to and from the asset were considered during the assessment. The asset is occasionally visible from Colchester Road, when breaks between buildings allow, and from The Street, looking north, the asset is the prominent element in the view. From Colchester Road the Project would be occasionally visible as a distant backdrop to the asset while east / west aligned wires would be visible in the views north along The Street and again in the background of the asset. Despite the relatively flat landscape open views of the asset from beyond the settlement are limited and largely screened mature trees and hedges that line the lanes and roads and also in places define field boundaries. The asset is, however, visible at points along the A137 Harwich Road to the north-east and the Project would interrupt views of the top few metres of asset's belltower as it crests above the settlement's tree cover. The setting of the asset is, however, greatly informed by the local streetscape and by the interrelationships the asset shares with other listed buildings and non-designated buildings that contribute positively to the character of the settlement.</p> <p data-bbox="1003 1031 2112 1394">6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] further describes the setting of the asset. The Applicant considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the asset can still be fully appreciated and understood within the settlement with the Project being a minor detraction in limited interactions.</p>

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5.20	<p>The setting is an important consideration in respect to heritage assets and with tall infrastructure proposed to be sited adjacent to the Scheduled Monument in Ardleigh the setting would be substantially and permanently harmed. The site is on a plateau in a landscape which has not changed substantially since these early settlements existed.</p>	<p>While the setting of the Scheduled Monument (1002146), including the monument's position on a plateau with views across the landscape and surrounding river valleys, contributes moderately to the asset's overall value, the primary significance is derived from its evidential and archaeological remains as detailed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report (Final Issue A) [APP-209].</p> <p>Accordingly, the Applicant considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape would remain in place beneath and around the proposed overhead line.</p>
5.22	<p>The nearest pylon to the Scheduled Monument would be TB6. This is an angle tower which would be only 162m away. The proposed EACN substation is only around 1km away. The result would be cumulative visual impact from both the overhead lines and the EACN substation across the entire Scheduled Monument site. This is clearly illustrated in the Zone of Theoretical Visibility (ZTV) maps supplied by NGET. The harm to the setting would be compounded by the removal of ancient trees (including oaks) and hedgerows from the nearby lane, Little Bromley Road, as part of the construction activities.</p>	<p>The setting assessment reported in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] concludes that due to the introduction of modern transport infrastructure, mineral extraction, solar power generation, artificial lakes/reservoirs, and the small-scale commercial and residential expansion of the local settlements, the setting of the asset makes a moderate contribution to its value. It should also be noted that the trees and hedgerows of the modern rural landscape are not contributing factors in the value of the asset. The Applicant considers that the assessment of permanent minor adverse significance of effect (not significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is appropriate as the rural landscape would remain in place beneath and around the proposed overhead line.</p>
5.23	<p>The repositioning of pylons TB5 and TB6 from the north to the south of Little Bromley Road, as presented as part of the "Essex 2" targeted consultation in 2025, increased the harm to the</p>	<p>The reasons for the placement of pylons TB5 and TB6 are detailed in 5.15 Design Development Report [APP-122]. To summarise paragraphs 6.5.31-32 and 6.5.44: the pylons were moved to the south of Little Bromley Road to reduce effects on the horticultural business and fishing interests to the north of</p>

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	<p>setting of the Scheduled Monument. The change involved TB5 and TB6 being positioned significantly closer to the Scheduled Monument site and TB6 also becoming an angle pylon. The consequence would be that the 7 towers closest to the Scheduled Monument site (TB4 to TB10) would be the most visually intrusive types: 5 angle pylons and 2 extended height, suspension towers (TB8 and TB9). The extended height towers are needed where the OHL is planned to cross the railway. Each of these would be 59.8m high.</p>	<p>thoroughfare. Undergrounding was considered for this section of the Project; however, the Essex Minerals Plan has identified the land south of the road as a site for silica sand extraction. National Grid chose the pylon option so as not to extensively sterilise the potential mineral resource. Some sterilisation of minerals due to pylon bases is likely to be unavoidable, but this is much reduced compared with the extent of sterilisation if the underground cables were to be positioned to the south of the road.</p>
5.27-5.28	<p>5.27 In the Ardleigh PC Historic Environment submission for the 2024 statutory consultation the inadequacy of geophysical survey techniques on the soils in this area was highlighted, as established in NGET's 2024 "EACN Substation Geophysical Survey Report". The issue was highlighted again in the Ardleigh PC response to the 2025 "Essex 2" targeted consultation where NGET documentation showed that geophysical survey results were still being extensively relied upon for locating infrastructure in this archaeologically sensitive area.</p> <p>5.28 Despite this feedback, it is noted that the area of concern was still treated as a "priority geophysical survey" area, as denoted by the green cross hatching around pylons TB5 to TB8 in the following figure, as opposed to a "priority archaeological trial trenching" area. The image was obtained from page 13 of "Figure 11.4 – Historic Environment – Geophysical Survey and Archaeological Trial Trenching Priority</p>	<p>The Applicant notes Ardleigh Parish Council's comments regarding the limitations of geophysical survey techniques in certain soil conditions. A programme of archaeological evaluation including both geophysical surveys and trial trenching, has been discussed and agreed with Local Planning Authority Archaeological Advisors and Historic England, as set out in the relevant Statements of Common Ground (5.9 Draft Statement of Common Ground [APP-089 to APP-100 and APP-102]). All completed interim and assessment reports for geophysical survey and trial trenching were submitted with the application for development consent in 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212] and 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213] along with the reports of geoarchaeological and archaeological monitoring of ground investigation works (6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]).</p> <p>The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] to</p>

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	Areas", submitted by NGET as part of the DCO application	<p data-bbox="1003 180 2121 475">6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083], of which the historic environment stakeholders are aware. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p> <p data-bbox="1003 483 2121 783">During the phase 2 archaeological trial trenching, where geophysical techniques are identified as less effective due to local soil conditions, this will be addressed by supplementing the survey with targeted trial trenching, as agreed with archaeological advisors. As illustrated in 6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas (Final Issue B) [AS-082] the Priority archaeological trial trenching survey is completed in the areas adjacent to pylons TB5 and TB6.</p>
5.29	Extensive construction works are proposed for this area and without very thorough archaeological investigation at this stage, the appropriate decisions cannot be made in relation to the project.	<p data-bbox="1003 807 2121 1434">Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on archaeology. A comprehensive desk-based assessment and walkover have been undertaken (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]), along with archaeological evaluation (6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report [AS-072 - AS-076], 6.11.A5: Environmental Statement Appendix 11.5 – Trial Trenching Results Report [AS-078], 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]). This has identified archaeological sites, both scheduled and non-designated, along the proposed Project. Where sites of archaeological significance were identified, the Applicant has sought to avoid direct impact. Where complete avoidance has not been feasible, the Applicant would ensure that any residual impacts are minimised and that appropriate mitigation measures are in place. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information [AS-068 - AS-083]. The fieldwork</p>

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		<p>undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.</p> <p>The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.</p>
5.31	<p>As there are heritage assets in this area “which have potential to demonstrate equivalent significance to Scheduled Monuments” or “may potentially hold, evidence of past human activity worthy of expert investigation at some point” these “should be considered subject to the policies for designated heritage assets”. It can therefore be concluded that any development of the site would be in breach of the Overarching National Policy Statement for energy (EN-1). The NPPF has similar provisions.</p>	<p>Value has been assigned following the methodology in 6.19 Scoping Report [APP-288 - APP-296], 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], and 6.11 Environmental Statement Chapter 11 - Historic Environment (Rev B) [AS-068] and using relevant guidance and professional judgement. The Applicant is confident in the heritage valuations given in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and is not proposed to make changes to the agreed methodology.</p>
5.32	<p>It is also noted that while archaeological discoveries can be made both prior to and during construction, the NPPF is very clear is stating in paragraph 211 “...the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted”.</p>	<p>The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.</p>

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6	Impacts on Nature and Natural Beauty	<p>An impact assessment on nature and natural beauty as a result of the Project is provided in 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026].</p> <p>Bird collision risk has been assessed within 6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170], 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 5.3 Habitats Regulations Assessment Report [APP-082]. This includes a comprehensive desk study of bird records with data obtained from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in over 26,000 bird records, across a lengthy species list. NatureScot (2016) guidance was used to determine Target Species and Secondary Species with regard to collision risk, and the distribution of these records has been mapped to determine hotspots and assess risk. Wintering / passage bird surveys, including around Ardleigh, have been undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds during migration or when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. The assessment did not identify locations which pose notable collision concern. 5.3 Habitats Regulations Assessment Report [APP-082] concluded there would be no adverse effects on the integrity of European Sites within the Impact Risk Zone of the Project, including Special Protection Areas and Ramsar Sites along the East Coast which are designated for passage and wintering birds. The conclusions of 5.3 Habitats Regulations Assessment Report [APP-082] have been accepted by Natural England.</p> <p>While the threshold was not reached to warrant mitigation measures, desk study records indicated that the large waterbody (Ardleigh Reservoir) provides habitat for a range of waterbirds. Mitigation measures have therefore been incorporated into the design on a precautionary basis, in the form of orange spacers and bird diverters on the earth wire at Ardleigh Reservoir, as detailed in 7.4 Outline Landscape and Ecological Management Plan [AS-046].</p> <p>This approach and assessment demonstrate compliance with National Policy Statement for Electricity Networks Infrastructure (EN-5) (2025) as the potential</p>

Ref	Matter Raised	Applicant's Response
		<p>for collision has been robustly evaluated and addressed through design stage assessment and targeted survey effort.</p>
6.21	<p>Pylons TB4 to TB8 would be located very close to Little Bromley Road. The widespread loss of trees and hedgerows during construction of the infrastructure would result in significant loss of local biodiversity and natural beauty. The 1777 map demonstrates that the lanes date back at least two centuries, and this is reflected in some of the species such as ancient oak trees.</p>	<p>Volume 6 - Environmental Statement is based on an assumed worse case tree and hedgerow removal, including that along Little Bromley Road, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated on pages 181 to 183 of 352 of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236].</p> <p>Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan [AS-046] confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice [APP-300]. Measures to avoid/mitigate impacts to all trees (including veterans) is also a Project commitment LV05 in 7.2 Outline Code of Construction Practice [APP-300]. Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan [AS-046] outlines the commitment to reinstate hedgerow field boundaries.</p> <p>The Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within 7.4 Outline Landscape and Ecological Management Plan [AS-046]. This is secured by Requirement 4 within 3.1 Draft Development Consent Order [APP-056]. Details of on-site tree planting will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of 3.1 Draft Development Consent Order [APP-056]. The Project would prioritise the replanting for individual trees within the Order Limits, however off-site provision may be required. Any off-site tree planting required because of this commitment would be secured via a legal agreement.</p> <p>There is one veteran tree (T662 English Oak) located along Little Bromley Road, in the overhead line span between TB6 and TB7. Due to potential line clearance requirements to the southern side of the canopy area, this veteran</p>

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		<p>tree is recorded as 'affected managed' and 'potentially affected' for operational use of the overhead line. With the exception of this one reported veteran tree, the trees and hedgerows that line Little Bromley Road do not meet with the description provided, '<i>The 1777 map demonstrates that the lanes date back at least two centuries, and this is reflected in some of the species such as ancient oak trees.</i>'. This is further supported by the Ancient Woodland Inventory (ATI) not reporting any trees of significance in the area of question. Veteran trees are included within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] as well as 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. At detailed design the Main Works Contractor(s) would seek to retain trees and hedgerows as per commitment B08 in 7.2 Outline Code of Construction Practice [APP-300].</p> <p>The Landscape and Visual Impact Assessment is set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The assessment of construction effects on landscape character recognises that some hedgerow and tree removal would occur within Bromley Heaths Landscape Character Area (LCA) 7A, including removal along Little Bromley Road. As stated above, vegetation removal along Little Bromley Road is illustrated on pages 181 to 183 of 352 of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. These figures illustrate a worst case of approximately one third of the trees along Little Bromley Road being removed and approximately half being potentially affected. Hedgerows would be affected to a lesser extent with hedgerow removal along Little Bromley Road occurring in a few discrete locations. The impacts on vegetation along Little Bromley Road would arise due to a combination of clearance required for the installation of overhead lines, underground cables and bellmouths and visibility splays for temporary access tracks. As stated above, the Applicant would seek to reduce removal of trees/hedgerows as far as practicable during detail design stage and would also replace trees and hedgerows where practicable on site. Moderate and significant (adverse) landscape effects are reported within approximately 1.5 km of the Order Limits in Bromley Heaths LCA 7A during construction. This is</p>

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		described from page 92 onwards in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] .
9	Cumulative Harm	
9.1	The proposal to locate the Norwich to Tilbury East Anglia Connection Node ("EACN") substation in Ardleigh would lead to substantial cumulative harm due to the other associated energy infrastructure projects proposed for Ardleigh and the adjacent parishes of Little Bromley and Lawford.	<p>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] presents an assessment of cumulative effects based on agreed methodology in 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] which includes consideration of other associated energy infrastructure projects proposed for Ardleigh and the adjacent parishes of Little Bromley and Lawford.</p> <p>A full list of other developments considered is detailed within 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]. The cumulative effects assessment also follows the Planning Inspectorate's advice page on Cumulative Effects Assessment. 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] also presents further detail on other development.</p>
9.2	The cumulative impact of construction traffic needs to be considered as part of the assessment as there will be substantial overlap in the timing of the construction of these projects. The predicted construction traffic levels reported by National Grid are alarming, noting also the huge size of some of the vehicles. No figures have been seen which show the cumulative impact of construction traffic from the concurrent projects.	The cumulative impact of construction traffic is assessed within the Environmental Statement which includes cumulative construction traffic numbers from other development. The baseline traffic numbers against which the effects of construction traffic have been assessed and reported in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] include any traffic that would be generated by committed or other development. Chapter 16 concludes that with mitigation in place there would be no significant effects. Mitigation measures are outlined within 7.4 Outline Construction Traffic Management Plan [APP-300] .

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