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Date 12 March 2026  
Sent via email:  
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## **Tendring District Council–Procedural Deadline 2 Response**

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

Dear Ms Hunt

Please find below Tendring District Council’s (TDC) Targeted Response to National Grid’s Comments on TDC Relevant Representation (RR) – which forms part of our procedural deadline 2 response. National Grid’s responses insofar as they relate to TDC’s RR are by and large contained in Pages 523–549 of document reference [REP1-132](#) (although National Grid makes reference to TDC concerns, objections and requests elsewhere and not included in the above mentioned page number range), however to assist the Examining Authority (ExA) and ensure succinctness as well as clarity of the message in a process that is already containing far too many documents, TDC’s targeted response below focuses on the points and responses by National Grid as set out in the above mentioned pages.

#### Executive Summary

TDC welcomes National Grid’s responses to our RR. However, having carefully reviewed the Applicant’s comments, TDC maintains that a significant number of issues raised in our RR remain unresolved, insufficiently evidenced, or deferred to later stages without meaningful engagement. TDC has already provided detailed analysis and evidence on all these matters in its Local Impact Report (LIR) – now submitted to the ExA, and further

reserves the right to respond to National Grid's subsequent comments on TDC's LIR in mid-April, when we will submit material under Procedural Deadline 3, including mostly likely, multiple questions by the ExA that we anticipate will be of relevance to the TDC area.

The following summarises TDC's position on each of National Grid's response points as set out in the pages mentioned above in document reference [REP1-132](#).

## 1. Need Case and Consideration of Alternatives

TDC notes that National Grid continues to rely primarily on the contracted background and its statutory duties, without addressing the central point raised in our RR: the absence of meaningful sensitivity testing of delivery assumptions and the lack of transparent evidence challenging the independent Hiorns Report. Our response here should also be read in conjunction with any comments Essex County Council will be submitting as part of their procedural deadline 2 response.

## 2. EACN Site Selection, Corridor Choice and the Holford/Horlock Rules

National Grid largely reiterates its original positions and, in many areas, simply states that it disagrees with TDC and that they are unwilling, or they feel that it is disproportionate, to provide the additional evidence and information that TDC are asking for. The Applicant has not provided the further evidence that TDC requested during pre-application discussions, nor the clear justification we had repeatedly sought for the selection of Ardleigh/Little Bromley over more suitable locations, including brownfield sites west of the A12.

In TDC's view:

- Key site selection questions remain unanswered, particularly regarding timing, flexibility assumptions, comparative impacts, and the weighting of customer convenience relative to community harm.
- The claimed constraints on western options have not been fully substantiated with the technical drawings, schematics, or evidence TDC repeatedly asked for. On a matter as consequential as National Grid's chosen EACN location, it simply is not sufficient to say that requests for such critical information is not proportionate as part of a development consent application, and once such alternative routes have been discounted, especially if they have been discounted on grounds that rely on 'professional judgements' that are not backed up by clear and transparent, qualifiable evidence that is capable of public scrutiny – as we have repeatedly set out.

- The degree of deviation of the pylon route around Ardleigh—and the significant visual, agricultural and residential harm this creates—we maintain our position that this is inconsistent with the stated reliance on the Holford and Horlock Rules.
- National Grid’s characterisation of “flexibility” for future unspecified customers continues to place disproportionate emphasis on customer convenience over landscape, food security and community wellbeing.

TDC considers the ExA must now judge whether the Applicant has supplied sufficient evidence to justify its conclusions.

### 3. Visual, Landscape, and Residential Amenity Impacts

While National Grid acknowledges significant adverse effects, the Applicant has not responded to the core concern: that the selection of the Ardleigh/Little Bromley location has intensified and concentrated impacts unnecessarily, and that other locations perform materially better—an assertion that National Grid has itself partially conceded (e.g., stronger performance of western sites on screening and visual containment).

TDC has addressed this in full within the LIR and maintains that the Applicant has not demonstrated a transparent or balanced assessment of alternatives that would reduce impacts in this highly sensitive landscape.

### 4. Agriculture, BMV Land and Food Security

National Grid’s position does not address the central concern that the proposed siting places nationally significant infrastructure at the very heart of the district’s most productive Grade 1 agricultural land, despite alternatives existing. The Applicant’s responses continue to treat BMV loss as unavoidable without demonstrating that the harm has been genuinely minimised.

TDC has presented extensive further evidence on this in the LIR.

### 5. Traffic and Transport

The Applicant’s response does not resolve TDC’s concerns regarding:

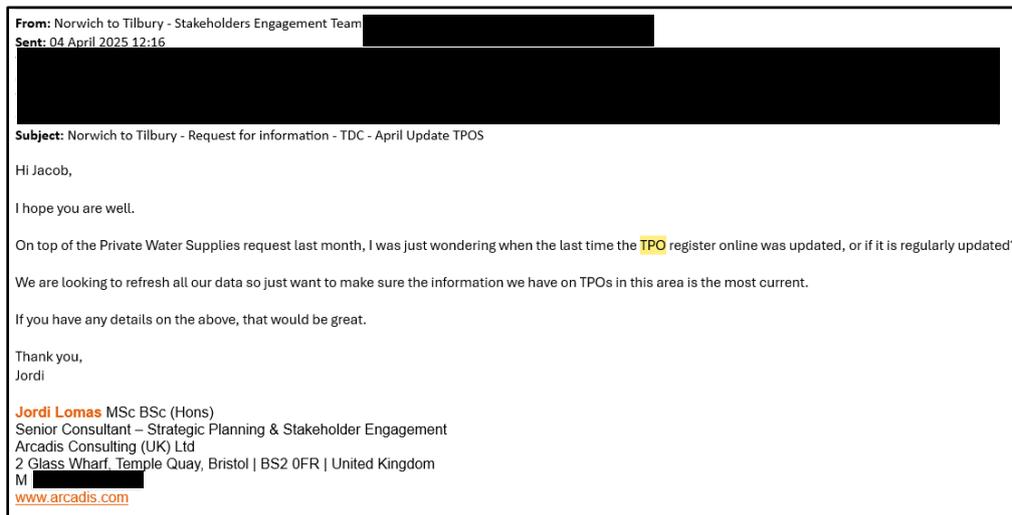
- Unsuitability of rural lanes for HGV volumes,
- Long-term consequences of widening or constructing haul routes, and
- Compounded impacts arising from simultaneous NSIP construction.

Without quantified assessment of Tendring-specific harm, the Council maintains that significant residual impacts remain, and this is further evidenced in the LIR.

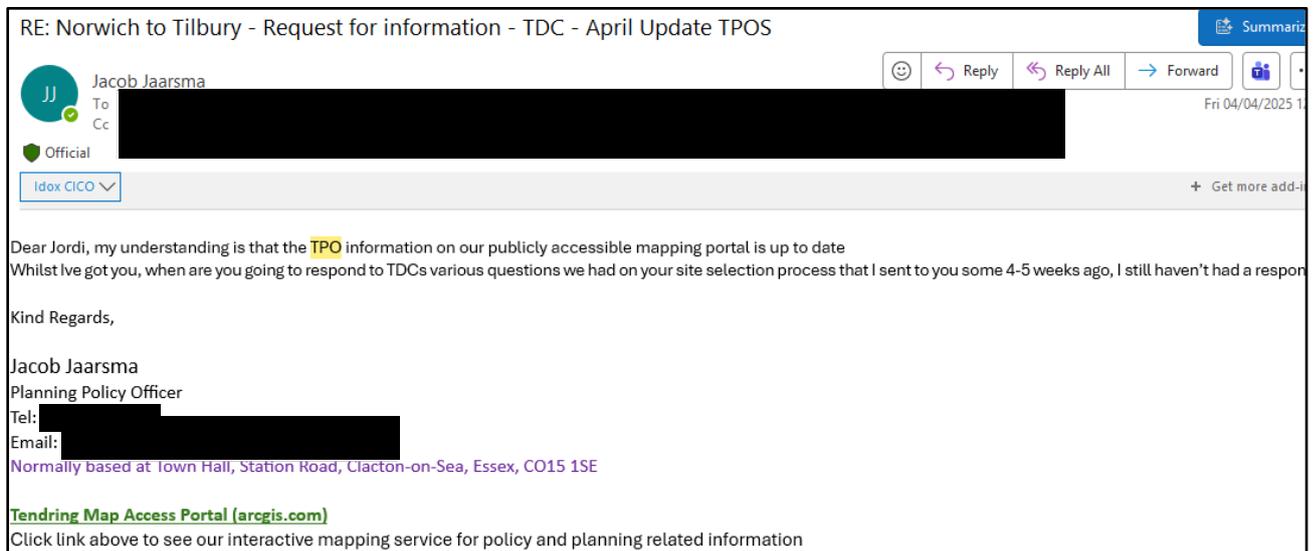
## 6. Ecology and Biodiversity (including TPOs and arboriculture)

National Grid states that TDC did not respond to an email from them on the 4<sup>th</sup> April 2025 seeking Tree Preservation Order (TPO) information. This is factually incorrect. TDC responded on the same day (4 April), confirming that our TPO dataset was current. A screenshot of these emails have been supplied below.

Arcadis's email dated 4 April 2025:



And TDCs response 32 minutes later on the same day (4 April 2025)



Fundamentally:

- The Applicant has not addressed the omission of many TPOs, many of which have been made several years ago, and whilst confirmation has been offered in April 2025 that our TPO database is up to date. This includes TPOs along Wick Lane where removal or conflict is proposed. TDC gets routine feedback from members of the public, agents, architects etc confirming the helpful nature of ability to view TPOs on a publicly accessible platform, and we routinely consider arboricultural reports with accurate TPO information obtained from this very mapping portal.

- TDC remains concerned that National Grid continues to rely on reports that contain errors and omissions, which materially affect routeing decisions and impact assessments.
- These deficiencies undermine confidence in the arboricultural baseline and has been examined in further detail within the LIR.

## 7. Heritage, Archaeology and the Setting of Rural Settlements

National Grid's response does not resolve the concern that the pylon alignment and EACN siting have created avoidable harm to heritage settings, particularly around Ardleigh and Little Bromley. TDC notes that the Applicant simply asserts compliance rather than addressing the specific deficiencies raised in the RR.

## 8. Cumulative Impacts and Coordination with Other NSIPs

National Grid's responses do not demonstrate the degree of cross-project coordination that TDC has consistently called for. Key risks remain, including overlapping construction periods, excessive construction hours that will result in significant residential amenity harm, traffic peaks, land take, and cumulative landscape effects.

TDC has fully evidenced these concerns in the LIR, and reserves the right to respond further to National Grid's future submissions.

## 9. Community Impacts, Health, Skills, Employment, Wellbeing and Socio-economics

The Applicant largely reiterates general statements about engagement and community benefit packages (including skills and employment), but does not address TDC's core issue: that the concentration of multiple NSIPs on north-west Tendring imposes exceptional cumulative harm without proportionate mitigation or compensation.

TDC maintains that the Applicant has not adequately assessed or mitigated these impacts.

## 10. Draft DCO and Governance

National Grid's responses do not address several detailed concerns raised jointly by ECC and TDC. These remain open and will be further examined through the SoCG process and the LIR. TDC emphasises that key issues within the DCO—particularly relating to construction controls, governance, monitoring, and flexibility parameters—are still unresolved.

## Conclusion

National Grid's responses on pages 523–549 do not resolve the majority of the concerns raised by TDC. In many cases the Applicant has simply restated its position without providing the additional information or evidence requested. TDC therefore:

- Maintains its objections as set out in the RR;
- Have provided detailed technical evidence in its Local Impact Report;
- Reserves the right to comment on the Applicant's response to TDC's LIR in mid-April; and
- Invites the ExA to consider whether the information before it is sufficient to support the conclusions National Grid draws, particularly where the additional and necessary evidence that TDC and many others are asking for, has not been supplied despite repeated requests.

TDC remains committed to constructive engagement throughout the Examination.