



cornerstone barristers

Planning Inspectorate
C/O Quadient
69 Buckingham Avenue
Slough
SL1 4PN

10th June 2026

Dear Sirs.

Application by National Grid Electricity Transmission for an order granting development consent for the Norwich to Tilbury project - EN020027

1. I am instructed to write to you on behalf of Ardleigh Parish Council and Little Bromley Parish Council (“the Parish Councils”) and to submit the attached documents in response to Deadline 5 of the Examination. These comprise:
 - a. Responses to the Examining Authority’s Second Written Questions;
 - b. ALBA Cumulative Effects Paper;
 - c. Public Rights of Way and Recreational Impacts Paper; and
 - d. A matrix identifying earlier submissions from the Parish Councils where material has been provided that is relevant to the questions now posed by the Examining Authority.
2. The Parish Councils are grateful for the continued scrutiny being applied by the Examining Authority to the issues of cumulative impact, landscape and visual effects, public access, alternatives and the relationship between the Project and the surrounding concentration of existing and proposed energy infrastructure within the Ardleigh and Little Bromley Area (“ALBA”).
3. The attached submissions are intended to assist the Examining Authority in its consideration of those matters and should be read alongside the Parish Councils’ previous submissions, including the visualisation evidence submitted at Deadline 4.
4. The Parish Councils wish to make two additional observations arising from material submitted by other Interested Parties during the Examination.
5. First, the Parish Councils have had the benefit of considering the submissions made by PEAL in respect of Deadline 5. They support the points raised by PEAL, but in particular the submissions made by Lord Banner KC concerning the interpretation and application of the Critical National Priority (“CNP”) provisions within EN-1. As has been set out previously, the Parish Councils do not dispute the existence of an urgent national need for electricity transmission infrastructure, nor do they dispute that the Project falls within the scope of the relevant national policy framework. However, they



respectfully agree with the proposition that recognition of a need for a particular type of infrastructure does not predetermine the acceptability of the particular means by which that infrastructure is delivered in any given case.


6. In the Parish Councils' submission, the existence of national need does not relieve the Applicant of the obligation to justify the route selected, the siting of the East Anglia Connection Node ("EACN"), the adequacy of alternatives considered, or the sufficiency of mitigation proposed. Nor does the CNP policy diminish the need for careful scrutiny of cumulative effects, landscape impacts, effects on communities and the adequacy of environmental assessment. The Parish Councils therefore agree that the Examination must continue to assess whether the Applicant has demonstrated that the particular solution proposed is justified on the evidence before the Examining Authority.
7. Secondly, the Parish Councils draw the Examining Authority's attention to the recent request for further information issued by the Scottish Government's Planning and Environmental Appeals Division in relation to the proposed Kintore to Tealing 400kV transmission line inquiry (this point having been drawn to the Parish Councils' attention via the PEAL submission). That request requires detailed additional assessment of agricultural operations, agricultural worker safety, machinery clearance issues, irrigation equipment, land use impacts and associated socio-economic effects before conclusions can properly be reached regarding the significance of those effects.
8. By way of example, the Parish Councils have recently corresponded with the manager of Holly Lodge Farm, Little Bromley, regarding the practical implications of the proposed overhead line infrastructure for modern agricultural operations. Concerns have been expressed regarding the increasing size and height of modern agricultural machinery; the operation of GPS-assisted precision farming equipment; the growing use of drones for crop monitoring, land management and security purposes; conductor clearances and line sag; and the safety implications for lone workers operating large agricultural equipment in proximity to high-voltage transmission lines.
9. In providing this information, the Parish Councils do not seek to advance technical conclusions regarding these matters. However, they note that such concerns closely mirror a number of the issues identified by the Scottish Government's Planning and Environmental Appeals Division as requiring further examination in the Kintore to Tealing matter. Whilst the Parish Councils do not suggest that the circumstances of the two projects are identical. However, they do submit that the Scottish inquiry demonstrates that concerns regarding the interaction between modern agricultural practices and major transmission infrastructure are capable of requiring detailed and site-specific scrutiny. In circumstances where similar concerns have been raised throughout this Examination, the Parish Councils invite the Examining Authority to



consider whether sufficient information has been provided to assess the implications of the Project for agricultural operations and rural businesses within the affected area fully.

10. The Parish Councils therefore respectfully submit that these are legitimate matters for scrutiny within the present Examination and that the Examining Authority should be satisfied that sufficient information has been provided regarding the interaction between the proposed infrastructure and modern agricultural practices before reaching its conclusions.
11. The Parish Councils remain grateful for the careful consideration being given to these matters and would be pleased to assist further should any additional information be required.

Yours sincerely


Counsel

Appendix A

Ardleigh Parish Council and Little Bromley Parish Council's (ALBA) Response to the ExA's First Written Questions (ExA Q2)

This response to ExA Q2 has been prepared on behalf of Ardleigh Parish Council ("APC") and Little Bromley Parish Council ("LBPC") (together "the Parish Councils"). In preparing these answers, the Parish Councils have also had regard to the material provided at Deadline 4. Where appropriate, this material is referenced in response to the questions.

The Parish Councils support the ExA's questions and challenges to the Applicant. From the outset the Parish Councils have found that National Grid's (the Applicant) responses to questions have been unhelpful both in their verbal answers during the consultations and their written responses to questions during the examination. As they did during the consultation they continue to expect us to just accept statements such as "we have looked at this in detail and on balance have decided that this is the best solution" but without clear reasons or evidence to support what they are saying. They still also seem to think that referring us to previously published documents that are hundreds of pages long and very poorly indexed is an adequate answer.

Many of the questions that the ExA has raised in Q2 have already been raised by the Parish Councils, sometimes on multiple occasions in previous submissions either during the consultations or during the examination. Concerns raised by the Parish Councils during the consultation have either been ignored or inadequately answered by the Applicant, which at times has appeared to have simply been "going through the motions" to get this DCO submitted and approved without putting in the work required to show that the scheme is acceptable in planning terms.

The Parish Councils' comments and observations are set out in what follows. The Parish Councils hope they have been set out in such a way so as to assist the ExA. In respect of avoiding duplication and to refer back to earlier submissions made by the Parish Councils, a matrix is also included that references documents in which the Parish Councils believe they have already submitted answers to the ExA's questions, in line with the guidance in Gen2.1.

GEN 2.3 Cumulative Assessment – Methodology

The Parish Councils support the ExA's questions in GEN- 2.3 and welcomes a clear explanation from the Applicant of all points raised. The cumulative effects of all 5 projects have not been clearly laid out.

Please refer to the included paper entitled Combined Cumulative Impact Ardleigh & Little Bromley, which deals with this question in detail

The Parish Councils also support TDC's REP3-094, which addresses Cumulative effects [across NSIPs]

GEN 2.4 Report on interrelationship with other infrastructure projects

The Parish Councils supports TDC REP3 -094 Cumulative effects [across NSIPs]

The Parish Councils would also point out that there is still not a clear map that shows clearly the interrelationship with other infrastructure projects, including order limits, haul roads, compounds and cable routes

DES 2.1 Independent Design Review – 1

The Parish Councils have previously requested maps and plans for the design of the overall site of the combined projects.

DES 2.2 Independent Design Review – 2

NF & FE have both consulted directly with communities and run sessions for Parish Councils. The Applicant has not, despite requests that it do so.

DES 2.3 Independent Design Review – 3

The Parish Councils' support ExA's question.

It is important for residents to be clear about what is proposed. It is very difficult to understand exactly what the sites will look like.

DES 2.4 Design of temporary works and compounds

The Parish Councils support Exa's question

BIO 2.1 Assessment of biodiversity deficit

Full support for ExA's question from the Parish Councils

APC questions how the underground swathe of 120 metres plus 100m potentially affected can be fitted into the space between Peake Fruit Farm reservoir and Little Bromley Road.

The Parish Councils do not consider that the current approach to replacement planting, habitat restoration, and Biodiversity Net Gain provides sufficient certainty regarding local delivery, long-term management, or successful ecological recovery.

The Parish Councils seek reassurance that any screening and replacement of trees and hedgerows are properly maintained and monitored for several years.

No map is available showing the overall areas in the ALBA where the removal of hedges and tree lines is proposed. These areas will also have been included in environmental/ ecological surveys. The Parish Councils ask “where are the reports”

The Applicant has failed to meet the criteria set out in DEFRA’s Environmental Improvement Plan (EIP) published on 1 December 2025 (endorsed by the Secretary of State for Environment, Food and Rural Affairs – Emma Reynolds MP)

BIO 2.3 Post-consent assessment work for bats

The Parish Councils support ExA question in that the information is vague as to the detail from the report. Local knowledge/ research indicates some of the following:

- Bats, Skylarks and Nightingales have been observed and heard around the area of Home Farm Lane and Little Bromley Road, particularly Peake Fruit Farm reservoir.
- Turtle Dove feeding strips (part of RSPB’s Turtle Dove project) and Barn Owl box in Home Farm Lane and Little Bromley Road.

There will be a permanent impact on these protected species.

The Parish Councils would like more detail on the method used to assess bats and the locations of bat roosts in the area.

Some landowners within the ALBA are still awaiting reports from surveys carried out on their land by the Applicant more than two years ago

BIO 2.9 Assessment of impacts on birds

The Parish Councils also support Pylons East Anglia Ltd REP4-369.

Ardleigh has many lakes and reservoirs, including Ardleigh Reservoir

Evidence has been submitted in previous submissions as to the scale and variety of bird life using these waterways. Numerous swans regularly congregate on the affected part of Ardleigh Reservoir.

The Parish Councils question the judgement made by the Applicant that “additional monitoring or adaptive management is not considered necessary or proportionate”

The Parish Councils would like to understand the use or dismissal of diverters on OHL’s. How would the assessment be applied?

BIO 2.10 Additional bird diverters

Ardleigh Reservoir sits directly under the East Atlantic Flyway (a major “avian superhighway”) and acts as a crucial inland stopover and refuelling point for migrating birds.

The Parish Councils have grave concerns over mitigation. NG needs to explain how diverters will work with so many birds flying together

BIO 2.15 Impact of the proposed development on Five Estuaries and North Falls Offshore Wind Farms

The Parish Councils are unclear on 'quantity of native hedgerows' that will be cumulatively lost within the ALBA. The Applicant should be required to confirm its plan in replacement planting/monitoring/servicing and this should be considered as a requirement to the DCO if granted.

BIO 2.17 Assessment of cumulative effects on biodiversity

The Parish Councils support the question posed by ExA

CA 2.1 Anglia Ruskin University (ARU) Writtle

The Parish Councils understand there is a similar situation in the ALBA, but where it appears landowners are being coerced into accepting Heads of Terms prior to a DCO being consented (the Applicant is offering early-signing incentive payments (up to 20% land rights value).

These will be forfeited if signing is refused!

The Parish Councils question as to whether these incentive payments have been included in the Applicant's costings?

DCO 2.A1 Articles - General

The Parish Councils supports the ExA question.

The Parish Councils have contributed to every consultation process and Relevant Representations, asking that this DCO be reconsidered and repositioned either offshore or the EACN placed in a less damaging site.

The Parish Councils representing their local communities are not confident that their representations are being fairly considered or responded to by the Applicant. This has led to a lack of confidence that the Applicant will ever communicate any changes it may consider in the future.

DCO 2.S3 Schedules 3, Requirement 4 (Construction Management Plans) 1

The Parish Councils have serious concerns in relation to this subject. The ALBA could be experiencing a construction period for many years, and without a strong management and complaints process independent of the constructors, we fear that breaches will be ignored or devalued

DCO 2.S6 Schedules 3, Requirement 4 (Construction Management Plan) 4

The Parish Councils share the ExA and Thurrock Council's concern.

Common sense should be applied. Experience shows that any traffic diversions on the A12 through the village can cause serious problems for residents.

The planned increased vehicle activity will have serious implications and effects on residents and businesses within ALBA

DCO 2.S8 Schedules 3, Requirement 4 (Construction Management Plan) 6

The Parish Councils endorse the ExA comments and question and would welcome details on mitigation for multiple vehicles/ machinery operation concurrently in various locations in the area

The Parish Councils agree that the focus on a single cottage is wholly inadequate given the number of properties that would potentially be affected.

DCO 2.S9 Schedules 3, Requirement 5 (Archaeology)

The Parish Councils have raised, in several submissions, that the whole ALBA area has a large amount of Archaeology.

The ALBA has been continuously settled since Neolithic times and both Parishes have Scheduled monuments. It is inconceivable that there is not archaeology that has not been discovered in the area.

The Parish Councils therefore support the County Council and Local Authority's concerns.

DCO 2.S10 Schedules 3, Requirement 7 (Construction Hours)

The Parish Councils are strongly opposed to weekend and Bank Holiday working.

Residents are already suffering from Wellbeing and Health issues as a result of the uncertainties.

There has to be respite, or the Applicant will face taking responsibility for harming people's mental health.

DCO 2.S11 Schedule 3 – Requirements 8 (Retention and removal of trees, woodland and hedgerows)

There are a number of TPOs throughout the ALBA.

The Parish Councils would like to understand what steps will be taken to protect them. For example, there are a number on Wick Lane and Little Bromley and Home Farm Lane.

Concerns have recently been raised by a landowner in Ardleigh, who risks losing an established woodland to at least 200m of underground cabling swathe. This woodland has been in existence since before 1842 and provides a precious, undisturbed wildlife haven and corridor. The Applicant has stated to the landowner that the cheapest option was to remove the woodland. The other, less destructive option, of mole boring cables under the B1029 and wood, has been ruled out by the Applicant on cost grounds.

The view of the Applicant being that the wood has insufficient environmental benefit as it is not classified as an ancient woodland. How will the Applicant adequately reinstate this habitat in any meaningful way?

Further, and by way of an update, it is understood that in respect of this particular area of woodland an application is currently being considered by Natural England with regard to its possible status as ancient woodland. The reference number for that application is 550408.

HE 2.1 Historic environment – methodology

The Parish Councils want to understand where/how assessments are decided. We agree with the ExA's question.

There is no official differentiation of the value of a conservation area. This is a subjective assessment that has no basis and is designed to suggest that there is less harm associated with a lower value.

HE 2.3 Grouping of heritage assets & HE 2.4 Assessments across multiple assets

The Parish Councils support both questions.

The assessments do not seem to take into account the settings. For example, surrounding a village with Pylons has a serious cumulative adverse effect on all the assets in multiple ways.

HE 2.10 Assessment of impacts on archaeology

The Parish Councils welcome this question.

Concerns relating to an area of high archaeological potential and the survey methods employed by the Applicant are highlighted in [AS-065] "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh".

To date, the Applicant has not shared any data on trenching results with either the local landowners or the Parish Councils.

We have no knowledge of any significant finds, although records indicate a likelihood of Roman archaeology in the vicinity of the EACN, as two Roman roads converge on the proposed sites of the EACN and windfarm substations.

LUS 2.2 Green Belt - 1

In a similar way, protected Green Space land is of great importance in ALBA, and land quality (Grade 1 BMV), both of which would be lost/damaged.

Grade 1 BMV is amongst a small percentage of the best in the UK. Due to fertile soils, flat open landscape, higher sunshine hours, and a generally drier climate, it's one of the best areas in the UK for growing staple crops like wheat, barley, oats and sugar beet.

The Parish Councils question whether this position by THE APPLICANT is justified.

LUS 2.4 Green Belt -3

As set out in its response to the Proposed Route Alignment and the EACN Substation Siting in Ardleigh Revisions 1 (submitted on 26 January 2026) (AS-065), Ardleigh Parish Council has identified Local Green Spaces within its Neighbourhood Plan, several of which would be seriously compromised by developments (see pages 18-21 of that document)

LV 2.8 Cumulative Landscape and Visual Assessment - landscape

The Parish Councils welcome the question as we do not seem to have seen (from the Applicant) any reference to how the EACN and associated substations and interconnector will change into a different landscape.

LV 2.12 Residential Visual Amenity Assessment – 1 (RVAA)

The change of visual amenity will be considerable across the whole of Little Bromley and Ardleigh.

Soft vegetation dies back in the winter, and deciduous trees will provide no effective screening for around six months of the year.

The Parish Councils question whether there is any legitimate argument that screening is valid mitigation in a flat landscape.

LV 2.14 Mitigation hierarchy

The Parish Councils would be interested in visualisations using low-height pylons from the EACN to the A12

LV 2.16 Mitigation and compensation - 1

From REP4-302, the Applicant does not seem to be proposing to compensate for landscape and visual effects at all. Ardleigh and Little Bromley Parish Council (ALBA) has already provided evidence on loss of business, loss of food production, blighting of properties, loss of social mobility, loss of landscape, loss of tranquillity, loss of mental health as opposed to the commercial interests of the Applicant.

If DCO consent is granted, the communities of Ardleigh and Little Bromley would expect substantial compensation to be provided.

NV 2.1 Noise & Vibration 1

The Parish Councils would like to understand how the construction noise levels will be monitored /mitigated for when unacceptable and the properties most affected?

Also of concern is cumulative on-going noise from the EACN and other substations and noise from the pylon cables

PRoW 2.1 PRoW 1

Please refer to the document: Impacts on Public Rights of Way and Recreational Access in Ardleigh Parish, appended to this document and prepared by the Parish Councils.

SS 2.1 Security and resilience

The Parish Councils support concerns raised by Burstall PC.

The Parish Councils are particularly concerned about the level of risk caused by the scale of the clustering of the electricity infrastructure around proposed substations, in this open rural site. In particular, the Parish Councils are concerned about:

- The sheer size of the structures surely make it extremely vulnerable in terms of accidental or deliberate damage/sabotage.

- Recent world events highlight the vulnerability of energy infrastructure and the level of security needed to ensure that such infrastructure is protected in the event of a conflict or disaster (such as a fire).
- areas where established hedgerows are currently part of boundary security for landowners. Removal of hedging will leave fields vulnerable to trespassing and fly-tipping. Insurance policies will be greatly affected, and extra premiums will be expected.

- How does the Applicant propose to address these risks?

TT 2.4 Outline CTMP 2

The Parish Councils invite the Applicant to engage with them, as North Falls and Five Estuaries have in the past. There exists a joint specific group set up to address the cumulative projects: Planning and Infrastructure Working Group, reporting to both Parish Councils.

The Applicant has always shown reluctance to do so during the consultation phases.

Ardleigh and Little Bromley Parish Councils
10 June 2026

Appendix B

Combined Cumulative Impact Ardleigh & Little Bromley (ALBA)

Introduction:

1. This paper is submitted on behalf of Ardleigh Parish Council and Little Bromley Parish Council (“the Parish Councils”) in response to the Examining Authority’s continuing consideration of cumulative effects arising from the Norwich to Tilbury project and associated infrastructure proposals within the Ardleigh and Little Bromley Area (“ALBA”). It is submitted to help illustrate the Parish Councils response to GEN 2.3 of EXQ2.
2. The paper focuses on the concentration of major energy infrastructure proposed within and around ALBA, including the East Anglia Connection Node (“EACN”), the North Falls and Five Estuaries offshore windfarm substations, the proposed Tarchon Interconnector converter station and associated battery storage proposals.
3. The purpose of the paper is not to repeat earlier submissions but to assist the Examining Authority in considering whether the cumulative effects of these projects have been adequately assessed and understood. The Parish Councils maintain the position that this has not happened.
4. In particular, the paper addresses:
 - a. the geographical concentration of nationally significant energy infrastructure within ALBA;
 - b. the cumulative effects of that concentration on landscape character, visual amenity, agriculture, ecology, transport and local communities;
 - c. the adequacy of the Applicant’s cumulative assessment methodology;
 - d. the Applicant’s conclusion that no additional mitigation is required notwithstanding the identification of major adverse and significant cumulative effects; and
 - e. the need for a more integrated assessment of the combined effects of these projects on Ardleigh, Little Bromley and neighbouring communities.
5. The Parish Councils submit that the cumulative effects experienced within ALBA are not properly understood when the various projects are considered in isolation and that a more holistic assessment is required in order for the Examining Authority to reach a fully informed recommendation.

Geographical Concentration of Electricity Infrastructure within ALBA

6. The purpose of this section is to try to assist the ExA to appreciate the sheer scale of the work being proposed. There are five projects which converge in the same small rural area within ALBA (See Appendix B):

- a. EACN (National Grid): Ardleigh/Little Bromley / Lawford area
 - b. North Falls substation: adjacent to EACN
 - c. Five Estuaries substation: adjacent to EACN
 - d. Battery Storage unit: adjacent to EACN
 - e. Tarchon converter station: within 5 km of EACN, refined search centred on Little Bromley
7. In effect, this is a planned energy hub concentration within the ALBA.
 8. To date North Falls, Five Estuaries the Battery storage unit and Tarchon have been treated as separate projects to the National Grid Norwich to Tilbury project and yet they contribute significantly to the overall negative cumulative effect of siting the EACN in the ALBA.
 9. Although the precise location of the Tarchon converter has yet to be decided we know it will be within 5km of the EACN and that it will cover 10ha. The combined land take for the five projects will be circa 95ha or between 130 and 150 football pitches. Most, if not all, will be on Grade1 BMV land which is currently farmed.
 10. Of course, within the ALBA it is not just the land take of the five projects but also the 5km of Underground cable route, up to 220m wide in some cases and the 21 50m high pylons and cable arrays. In addition, there will be multiple haul roads, access roads, construction compounds and drainage systems.
 11. This will result in a networked industrial landscape. This is discussed further in what follows.

Cumulative effects of the concentration of infrastructure on ALBA

Landscape & visual impact

12. The multiple substations, converter station and battery storage will result in large industrial buildings occupying a vast area of previously flat agricultural landscape with trees and hedgerows. The pylons and the cable arrays that will surround the village on three sides are the most visually damaging as most are angle pylons.
13. This will result in a loss of the rural skyline and the industrialisation of the countryside. Permanently adversely impacting the rural nature and setting of the ALBA.

Land use & agriculture

14. The land take is BMV land, predominantly grade 1 with some grade 2 & 3. Many of the farms will become unviable as fields with pylons will lead to fragmentation of fields Those in the undergrounding swathe will find that the ground will be permanently damaged
15. There are 4 active mineral quarries currently and 7 other potential sites have been identified for future extraction of sands and gravel including very high value and rare silica sands. Some of which could be lost as a result of the developments.

16. This will result **in** long-term degradation of agricultural viability and loss of some of the most valuable agricultural land in the country.
17. There is also potential loss of minerals,

Traffic & construction

18. Simultaneous construction phases likely over 5+ years with road closures, noise and vibration and unprecedented volumes of construction traffic on rural lanes and through villages.
19. Proposed working hours from 7am and 7pm with slightly reduced hours at weekends and Bank Holidays.
20. **This will lead to** sustained disruption over multiple years and risk the health and wellbeing of the communities of the ALBA

Drainage & water environment

21. Large impermeable surfaces, extensive trenching and altered drainage patterns will create flood risk and groundwater disruption.

Ecological fragmentation

22. Hedgerow removal, wildlife corridor severance and habitat loss will lead to a breakdown of rural ecological networks

Cumulative “energy hub” effect

23. The ALBA becomes one of the largest electricity infrastructure hubs in the UK
 - a. National Grid hub (EACN)
 - b. Two offshore wind substations
 - c. One international interconnector converter station
 - d. Battery Storage
24. This is a deliberately planned strategic industrialisation of a rural parish landscape

CONCLUSIONS IN OBJECTION TO THE SCHEME

Over-concentration of infrastructure

25. The Parish Councils object strongly to the unprecedented concentration of major energy infrastructure proposed within the Ardeleigh and Little Bromley area.
26. The Norwich to Tilbury project establishes the East Anglia Connection Node (EACN) as a large new 400 kV substation hub. This is then compounded by the proposed North Falls and Five Estuaries offshore windfarm substations, both of which are to be located adjacent to, and dependent upon, the EACN.

27. The Tarchon Interconnector further intensifies this concentration by proposing a converter station within a 5 km radius of the same node, with consultation material indicating a refined search area centred on Little Bromley.
28. Taken together, these projects would result in the co-location of:
- a. A major National Grid transmission hub
 - b. Two large offshore wind substations
 - c. An HVDC interconnector converter station
29. This represents a level of infrastructure concentration wholly out of scale with the rural character of the area.

National Grids cumulative impact assessment

30. National Grid has updated it’s response to cumulative effects in the document:

Document: 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update.

31. The Parish Councils consider that this response update is still inadequate for the following reasons:

32. As in **Exa Q2 Gen2.3** we question the assessment methodology, For example in *Table 2.2 Assessment of inter-project cumulative effects from clusters of other development with the Project (see below)* there are many examples of where the **Significance of Effect** is rated as **Major adverse and significant** and yet under the heading **Additional Mitigation** it states **No additional mitigation measures** were identified in addition to those already identified for landscape and visual receptors detailed in **6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226]**

33. A specific example of this is for **Effects on Bromley Heaths LCA (Project Section C)** which covers all the projects that affect the **ALBA** i.e. the EACN, North Falls, Five Estuaries, Tarcon and Battery Storage, Martells Quarry extension, Food Storage facility and Asphalt plant, as can be seen from the table below the **inter project cumulative effect** is rated: **Major adverse and significant** but **Additional Mitigation** is: **No additional mitigation measures were identified in addition to those already identified for landscape and visual receptors detailed in 6.13 Environmental Statement Chapter 13 –Landscape and Visual [APP-226]**

Residual Effects from the Project	Clusters of Other Developments Considered	Inter-Project Cumulative Effect from the Project and Clusters of Other Development	Significance of Effect	Additional Mitigation
Effects on Bromley Heaths	DCO8, DCO9, ECC27, T3, T17 DCO15 T34	The Bromley Heaths LCA extends from the northeastern edge of	Major adverse and significant inter-project cumulative	No additional mitigation measures were

<p>LCA (Project Section C)</p>		<p>Colchester near the A12 to the eastern edge of the ZOI near Horsley Cross and Little Bentley, and includes the settlements at Ardleigh and Lawford. During construction, assuming all other developments would be built at the same time as the Project, there Major adverse and significant inter-project cumulative landscape effects are anticipated should the construction periods of all other development and the Project overlap. This includes where other developments affect a larger proportion of the LCA in close proximity to the Project, such as the landscape to the No additional mitigation measures were identified in addition to those already identified for landscape and visual receptors detailed in 6.13 Environmental Statement Chapter 13 – National Grid May 2026 Norwich to Tilbury 16 Residual Effects from the Project Clusters of Other Developments Considered Inter-Project Cumulative Effect from the Project and Clusters of Other Development Significance of Effect Additional Mitigation would be effects on the landscape through the introduction of</p>	<p>landscape effects are anticipated should the construction periods of all other development and the Project overlap. This includes where other developments affect a larger proportion of the LCA in close proximity to the Project, such as west of Litte Bromley where the onshore substations and battery storage area are located, and in areas where other developments are in close proximity to the Project such as near the A12. Major adverse and significant inter-project cumulative landscape effects are also anticipated at operation (and maintenance). Significant effects are identified on this receptor in isolation in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP226].</p>	<p>identified in addition to those already identified for landscape and visual receptors detailed in 6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226]</p>
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		<p>construction activity relating to the Project, the Five Estuaries Offshore Wind Farm onshore substation and grid connection (DCO8), the North Falls Offshore Wind Farm onshore substation and grid connection (DCO9), the Tarchon onshore convertor station (DCO15), the Battery storage adjacent to Lawford Substation (T3), the western extension to Martells Quarry (ECC27), a Food storage and distribution facility (T17) to the east of the A12 and erection of an asphalt plant east of Old Ipswich Road North (T34). At operation (and maintenance) there would be direct effects on the key characteristics of the landscape through the introduction of the Project and the other developments described above.</p>		
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34. This is a common theme throughout the project. The reason for no Additional Measures appears to be the reliance on **6.13 Environmental Statement Chapter 13 –Landscape and Visual [APP-226]** which explains the three levels of mitigation:

- a. Embedded Mitigation
- b. Standard Mitigation
- c. Additional Mitigation

35. National Grid maintains that no Additional Mitigation is required as even when there are “**major adverse effects**” identified they are covered by Embedded or Standard Mitigation.

36. This assumption is highly questionable. For example, extracted from APP - 226:

Embedded Mitigation

13.6.2 Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features, including landscape and visual features, as far as reasonably practicable.

13.6.3 National Grid has also embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project.

13.6.4 Embedded measures are those that are intrinsic to and built into the design of the Project, which are presented in Table 4.2 in Chapter 4: Project Description (document reference 6.4). Embedded measures relevant to Landscape and Visual include:

- Sensitive routeing and siting of the alignment and Order Limits – **as far as practicable**, effects on identified environmental (including landscape and visual, ecology and heritage assets) and socio-economics receptors have been avoided and reduced

37. Embedded Mitigation has clearly not been applied to The Norwich to Tilbury Project. In the case of ALBA and other locations on the route. 13.6.2, 13.6.3 and 13.6.4 (bullet 1) have clearly been ignored as there is little evidence that alternative routeing or locations have been seriously considered. The use of “as far as practicable” is the get out phrase that the ExA has picked up on.

38. As we have stated in previous submissions there has been no consultation or evidence that alternative routeing and locations have ever been properly assessed.

Standard Mitigation

13.6.5 Standard mitigation measures, comprising management activities and techniques, would be implemented during construction of the Project to limit effects through adherence to good site practices and achieving legal compliance.

39. Standard mitigation is in fact not mitigation at all as it is not applied to provide mitigation in a particular case but is just standard legally compliant construction practice generally applied

Safety and Security

40. All projects converge at the EACN at Ardleigh /Little Bromley and neighbouring Lawford which results in a large potential target for terrorism, with the ALBA becoming the potential victim of any ensuing explosion, fire or other related catastrophe.

41. The Tendring Peninsula is the sunniest and driest place in the UK and with tinder-dry crops and stubble fields for many months of the year, fire is always a hazard. Crop and stubble fires spread extremely quickly with "wildfires" becoming increasingly common in the UK - so any proposals

must consider these issues and the impact/increased risk that construction and siting of electricity infrastructure will pose for local communities and the security of the nation's power supplies. As witnessed in Ukraine, exposed clustered infrastructure is extremely vulnerable.

42. Access to the sites is along country lanes and fire and rescue services are many miles away. Battery storage is now known to be extremely difficult to control and extinguish if a fire occurs.

Land take

43. Ardleigh Parish currently in only 15% built on, and this generously includes agricultural buildings like glass houses. Little Bromley is even less developed. This is essential quantification of why we are classified as a 'rural parishes ', something that is cherished by residents and part of the USP of living here.

44. The Parish Councils believe that:

- a. Even though NG have produced tables which include projects that are in geographical proximity the cumulative harms are not being properly assessed
- b. When the assessment is combined it is focussing on the construction phase and maintenance but does not seem to appreciate the long-term cumulative effect on the communities of the sheer volume of new infrastructure.
- c. The construction and maintenance phase will be devastating but the permanent loss of amenity and rural character can never be restored to the communities.
- d. There is no proper integrated assessment of combined effects on:
 - i. Ardleigh
 - ii. Little Bromley
- e. Other neighbouring Parishes

45. Appendices A, B and C show the locations of the three projects including Pylon and cable routes. The only way to appreciate the cumulative effect of these four projects would be to combine the four projects onto one map.

46. Appendix D Produced by National Grid at the request of the Norwich to Tilbury ExA shows the EACN and the two windfarm substation but fails to show the wider context of cumulative effect of the five projects on ALBA.

47. The Parish Councils consider that:

- a. The combined effect of these five projects represents an over-concentration of nationally significant infrastructure in a single rural locality, resulting in unacceptable cumulative harm. As well as a health and security risk

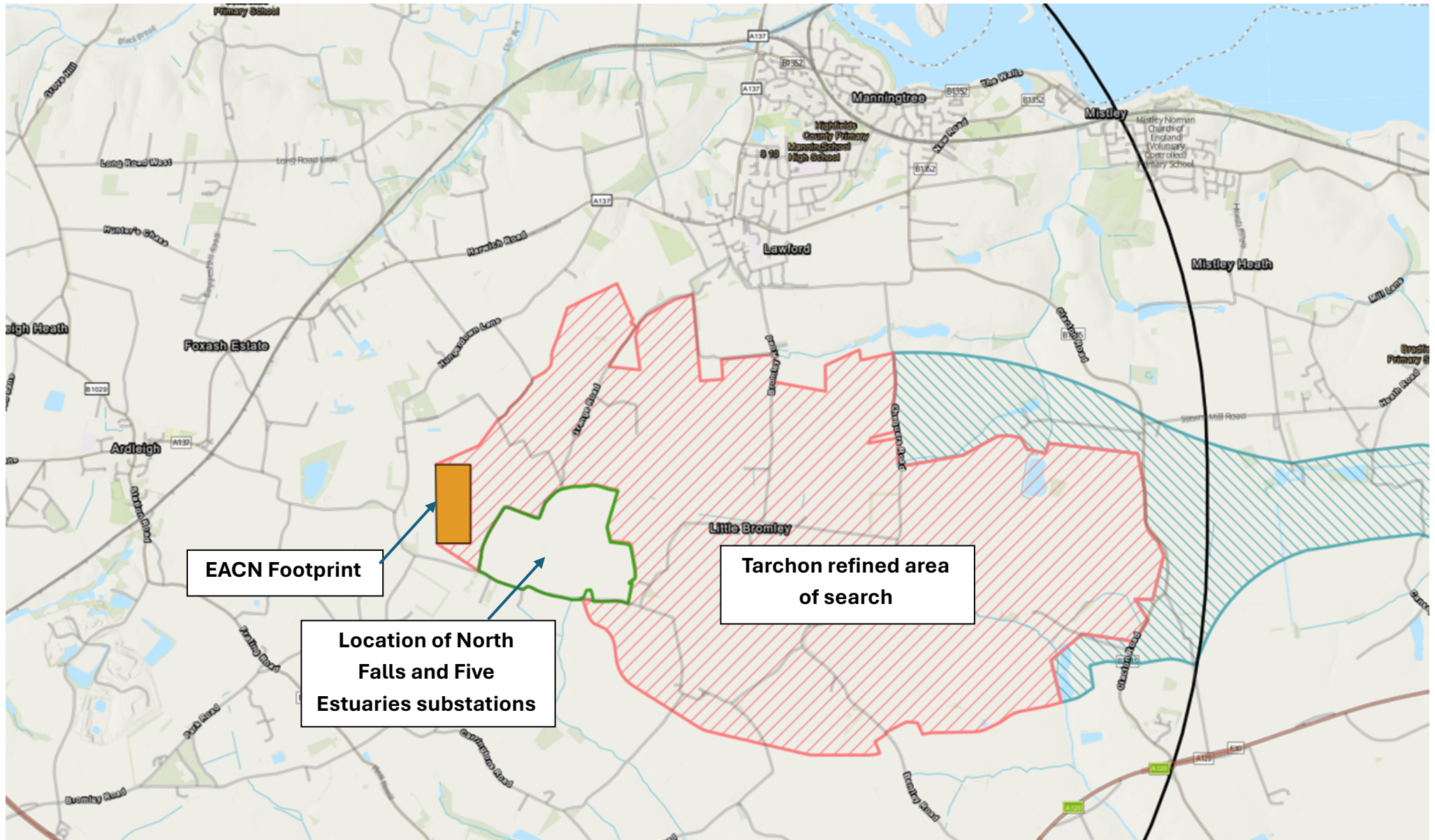
- b. Until a full, integrated cumulative assessment is undertaken, including maximum design scenarios across all projects, the proposals must be strongly resisted.

- c. These are not five separate projects, but a single, cumulative energy super-hub being created in a rural parish area. Appendix E shows the scale of current and proposed developments in the area.

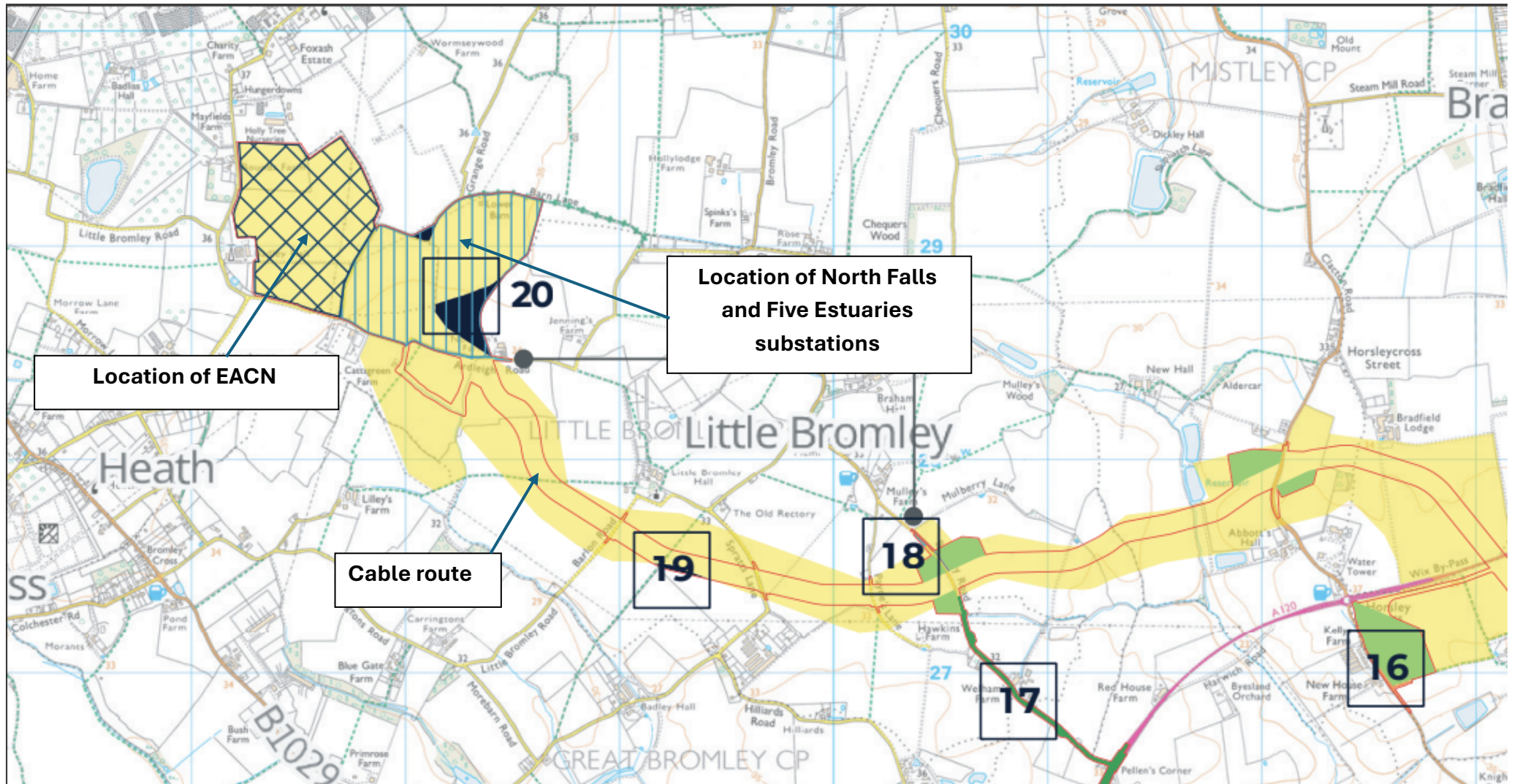
Note: This has been partially produced by AI drawing on documents produced by the five projects.

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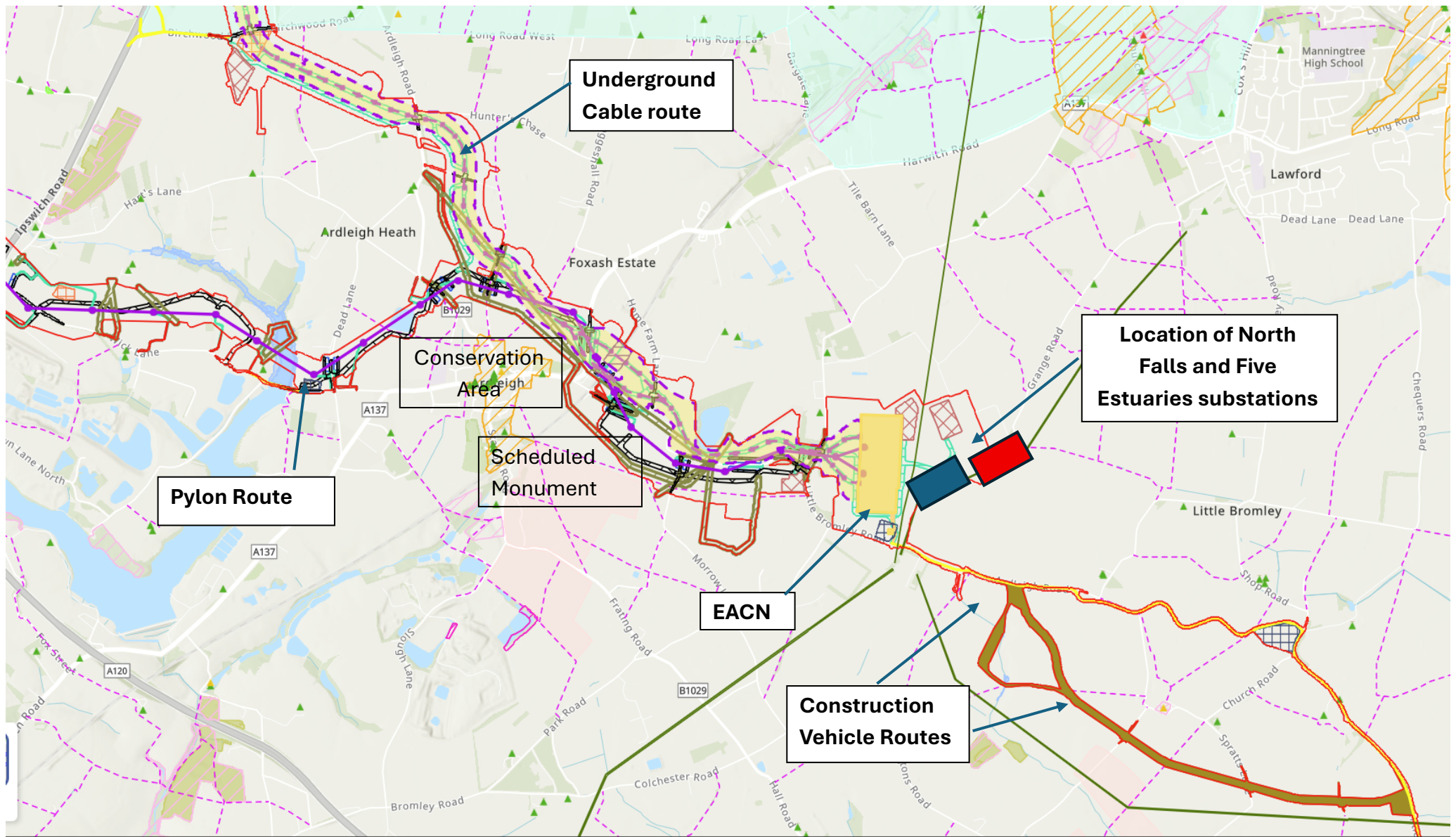
Appendix A Map showing the Tarchon refined search area and the proximity to the windfarm substations and the EACN



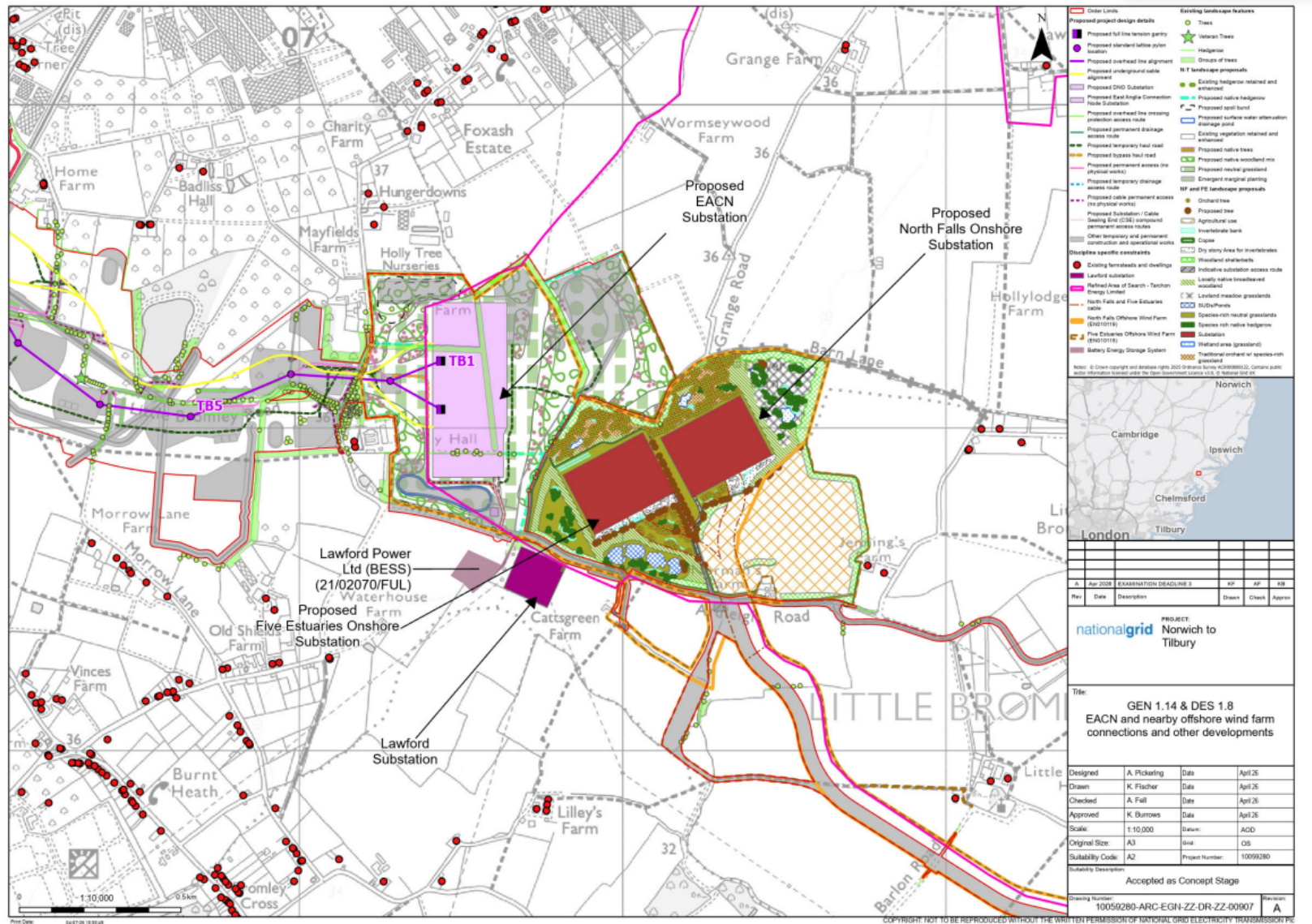
Appendix B Shows the location of the windfarm substations and the cable route



Appendix C Shows Three substations, underground cable route and the pylon route. Note the size of the Substation sites in comparison to the Ardleigh Conservation area and the proximity of the Scheduled Monument to the cable and Pylon routes.

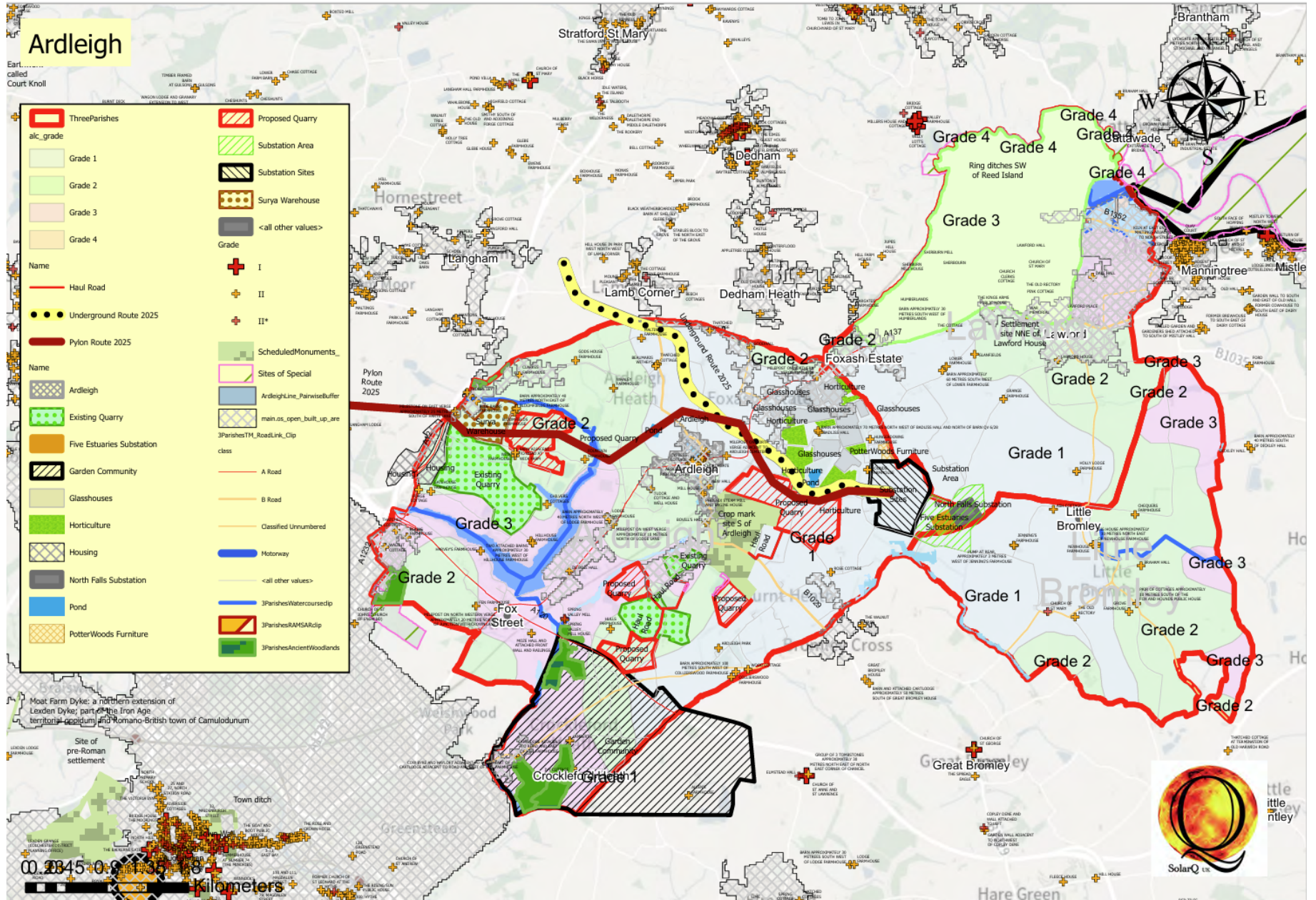


Appendix D Map produced by National Grid at the request of the Norwich to Tilbury ExA. It shows the EACN and the two windfarm substations



Appendix E

This map shows the scale of the current and proposed developments in the area.



Appendix C

Impacts on Public Rights of Way and recreational access in Ardleigh Parish

1. Introduction

This submission is made to assist the Examining Authority in its consideration of the likely effects of the Norwich–Tilbury 400 kV Project on Public Rights of Way and related recreational use within Ardleigh Parish. It draws together matters arising from hearing discussions, action points, parish representations and personal representations, and focuses on the practical consequences for local access, safety, amenity and enjoyment of the countryside.

In summary, the evidence indicates that the project is likely to cause substantial disruption to key walking routes, reduce the safety and attractiveness of lanes used by cyclists and horse riders, and diminish the wider recreational amenity of Ardleigh's rural landscape unless more specific mitigation is secured.

For the reasons set out below, it is submitted that the effects on Ardleigh's access network and countryside experience are material considerations that should carry substantial weight in the Examination.

2. Principal concerns arising from the evidence

2.1 Disruption to Public Rights of Way and local walking routes

The material before the Examination indicates that Ardleigh residents rely heavily on footpaths, quiet lanes and other rural routes for both everyday access and recreation. Particular concern is raised in relation to footpaths FP 15827, FP 15828 and FP 28158, which are identified as likely to be closed temporarily during construction. The effect of those closures would be to sever established walking routes and compel users to take longer alternatives on roads that may also be affected by construction traffic. For walkers, however, the issue is not merely one of route continuity. The value of these routes lies also in their relative safety, tranquillity and separation from vehicular traffic. The introduction of heavy plant, large haulage vehicles, construction noise, dust, temporary traffic management and other associated activity would materially diminish the suitability of local routes for walking and, in some cases, expose pedestrians to conditions that are appreciably less safe than those presently enjoyed.

This is not simply a question of temporary inconvenience. The evidence suggests that route closures, together with noise, dust, visual intrusion and the presence of heavy machinery, would materially reduce the enjoyment and tranquillity of the countryside. That concern is reinforced by the Ardleigh Neighbourhood Plan, which places clear emphasis on rural character, recreational access and the value of the local path network.

2.2 Effects on cyclists and horse riders

Although the most direct impacts fall upon walkers, the evidence also supports a stronger concern in relation to horse riders. In Ardleigh, riding depends to a significant extent upon quiet rural lanes, protected lanes and a limited bridleway network whose value lies not only in physical availability but in the relative peace, quiet and predictability of the environment. Horses are highly sensitive to noise, sudden movement and close passing traffic. The introduction of large haulage vehicles, construction plant, temporary traffic management, reversing alarms, engine noise and other construction activity would therefore give rise to materially increased risk to rider safety, as well as rendering routes that are presently suitable

for riding substantially less attractive and, in some cases, unsuitable for that purpose. These effects are not adequately answered by general references to traffic management alone, because the issue is not merely one of access but of whether riders can use those routes in conditions that are reasonably safe and fit for equestrian use.

2.3 Lack of detail in the current management approach

A recurring theme in the hearing material is the absence of sufficiently clear information about when closures will occur, how long they will last, and how access will be maintained safely during the works. Ardleigh Parish Council's concerns were acknowledged in the hearing, but substantive answers were deferred. In addition, both Essex and Suffolk authorities are recorded as seeking a stronger and more detailed Public Rights of Way Management Plan, with firmer commitments on mitigation and recognition of loss of amenity as well as mere functional access.

3. Overall assessment

Taken together, the evidence points to a material degradation of Ardleigh's public access network and countryside experience during construction, with some effects likely to persist thereafter through long-term changes to landscape character. The most serious effects concern the temporary closure of key footpaths and the resulting severance of established routes. In the case of walkers, the concern is not limited to continuity of access: the evidence also indicates that routes and alternatives may become materially less safe and less suitable for pedestrian use by reason of construction traffic, heavy plant, noise, dust and other associated disturbance. The broader diminution of recreational amenity, including for cyclists and horse riders using quiet lanes and bridleways, is likewise significant and should not be understated. In addition, the Ardleigh Neighbourhood Plan confirms that Ardleigh Reservoir supports an established fishery, including Ardleigh Fly Fishing Club. To the extent that angling activity or access to fishing locations would be affected by the proposed works or by the presence of overhead electricity infrastructure, this gives rise not only to issues of access and amenity but also to legitimate safety concerns for anglers, including in relation to the risks associated with fishing in proximity to overhead cables.

4. Requested action by the Examining Authority

In light of those matters, the Examining Authority is respectfully invited to require the Applicant to provide clearer and more enforceable mitigation in relation to Ardleigh's Public Rights of Way and recreational access. In particular, the following matters should be secured.

1. A detailed schedule of all proposed closures, restrictions and diversions affecting Ardleigh routes, including dates, likely duration and the reasons for each intervention.
2. Safe, convenient and clearly signed temporary alternatives for walkers, cyclists and horse riders, designed so far as reasonably possible to avoid conflict with construction traffic and to remain reasonably safe and suitable for pedestrian use throughout the construction period.
3. A firm commitment to reinstate affected routes promptly following the completion of works and, where possible, to secure enhancement rather than mere replacement.
4. Additional mitigation for traffic, safety, noise, landscape and amenity impacts on protected lanes, bridleways and other rural routes used for recreation, including specific provision for horse riders where large haulage vehicles, construction noise or other disturbance may make routes unsafe or unsuitable for equestrian use.

5. A specific assessment of any effects on recreational fishing access and safety at Ardleigh Reservoir and associated and other fishing locations, together with appropriate mitigation where angling activity may be affected by construction activity, route restrictions or proximity to overhead electricity infrastructure.
6. Structured engagement with Ardleigh Parish Council and other persons with a legitimate recreational interest in the affected routes and amenities, including anglers where relevant, so that route management and mitigation properly reflect established patterns of local use.

These impacts are **cumulative and long-lasting**, and should be treated as **material considerations** in the Examination.

5. Conclusion

For these reasons, it is submitted that the impacts on Ardleigh's Public Rights of Way and recreational routes are significant and require more detailed scrutiny and stronger mitigation than is presently secured. The Examining Authority is respectfully invited to take these local effects fully into account in its consideration of the application.

Ardleigh and Little Bromley Parish Councils

10 June 2026

Appendix D

Deadline 5 ExQ2 Response Matrix - Ardleigh and Little Bromley Area (ALBA)

Purpose. This working matrix cross-references the Examining Authority ExQ2 questions to the APC/LBPC evidence base, gives page/section references, and provides draft response points for Deadline 5. Page references are to the PDF page numbers of the named documents unless otherwise stated. A list of source documents used is at the bottom of the matrix and includes

Scope. The matrix focuses on questions most relevant to Ardleigh and Little Bromley.

Priority Response Matrix

ExQ2 question	Priority	Evidence / exact document location	APC/LBPC response	Evidence gap
GEN 2.3 - Cumulative Assessment - Methodology	Very high	<ul style="list-style-type: none"> APC and LBPC Response to ExQ1, pp.2-4 (GEN 1.1 and CNP), pp.8-10 (GEN 1.26); Targeted Consultation Response, pp.1-2 and 6-7; Route Alignment and EACN Siting Report, Sections 2-3 and 9 (pp.5-8, p.31). 	The cumulative assessment remains inadequate for the Ardleigh and Little Bromley Area (ALBA). The Applicant should be required to assess the ALBA as a single infrastructure cluster, not as isolated projects. Localised effects can be major and significant where the receptor is highly susceptible or valued, and ALBA is an obvious example because of EACN, Five Estuaries, North Falls, Tarchon, BESS, minerals and road works. The assessment should expressly test the maximum overlapping construction and operation scenario.	An ALBA cumulative plan and a receptor-by-receptor explanation of how significance was derived.
GEN 2.4 - Report on interrelationship with other infrastructure projects	Very high	<ul style="list-style-type: none"> APC Targeted Consultation Response, pp.1-2, 6-7 and 12; APC Letter to PINS 19.9.25, pp.1-3; APC Representation, pp.2, 5, 7 and 10-12; Route Alignment Report, Section 9 (p.31). 	The interrelationship report must be checked against local knowledge and should not understate the role of Tarchon or the windfarm substations. It should show EACN, Five Estuaries, North Falls, Tarchon, BESS, minerals, construction access and mitigation land on one plan. Current uncertainty about Tarchon is itself a planning risk and should not be treated as absence of effect.	ALBA schedule with status, footprint, programme, construction routes and mitigation land.
GEN 2.5 - Cumulative Assessment - Inter-Project Effects	Very high	<ul style="list-style-type: none"> APC and LBPC Response to ExQ1, pp.8-10; Deadline 2 Submission, pp.2-6; Targeted Consultation Response, pp.1-2 and 12; Viewpoints Report, pp.3-6. 	The Parish Councils reserve the right to comment on any later cumulative assessment. The cut-off date must capture all known ALBA schemes and material planning risks, including projects that are not yet fully designed but are functionally connected to the EACN. A Deadline 7 assessment will be too late unless accompanied by clear signposting and sufficient time for IP comment.	Any updated ES chapter, interrelationship report and plans are issued in clean and tracked form with ALBA-specific summary tables.
DES 2.1 - Independent Design Review - 1	High	<ul style="list-style-type: none"> Joint Substations Design Guide comments, pp.1-3; Route Alignment Report, Sections 7-8 (pp.22-30); Statutory Consultation Response, Part 5 (pp.39-47). 	The Parish Councils support the ExA question. The EACN is not materially less sensitive than the Five Estuaries and North Falls substations. It forms part of the same landscape cluster and should be subject to equivalent design scrutiny, including siting, appearance, lighting, boundary treatment, earthworks, planting and cumulative visual effects.	Applicant to produce a comparative design sensitivity table for EACN, Five Estuaries and North Falls.
DES 2.2 - Independent Design Review - 2	Very high	<ul style="list-style-type: none"> Joint Substations Design Guide comments, pp.1-3; APC Representation, pp.2-3 and 8; Route Alignment Report, Sections 8-9 (pp.28-31). 	The absence of independent design review for EACN is unjustified given its interrelationship with two consented windfarm substations and its position at the centre of the ALBA infrastructure cluster. The draft DCO should be amended to secure independent design review for the EACN and associated infrastructure.	DCO wording or a requirement equivalent to North Falls/Five Estuaries.
DES 2.3 - Independent Design Review - 3	High	<ul style="list-style-type: none"> Joint Substations Design Guide comments, pp.1-3; Route Alignment Report, Sections 7-8; Viewpoints Report, pp.3-6 and 12-25. 	Electrical equipment, AIS infrastructure, fencing, access roads, lighting and hard standing can be visually intrusive even if not buildings. Design controls should cover all visible permanent infrastructure, not just buildings.	A requirement controlling colour, finish, height, lighting, security fencing, bunds, planting and maintenance compounds.
DES 2.5 - Approach to scenarios	High	<ul style="list-style-type: none"> APC and LBPC Response to ExQ1, pp.5-7; 	Unresolved scenarios are not peripheral for ALBA. They go to whether EACN and the associated road and cable infrastructure are necessary, proportionate and correctly sited. The Applicant should identify which	An ALBA scenario table: base case, worst case, no Tarchon, alternative windfarm connection, alternative EACN siting.

		<ul style="list-style-type: none"> Response to Deadline 1, pp.1-7; Route Alignment Report, Sections 7-8 and Appendix H; Statutory Consultation Response, Part 1 and Part 5. 	elements depend on third-party projects and what happens if those projects change.	
BIO 2.1 - Assessment of biodiversity deficit	Medium-high	<ul style="list-style-type: none"> Statutory Consultation Response, Environment/Habitat section (pp.7-15); Targeted Consultation Response, pp.6-7; Route Alignment Report, Section 6 (pp.18-21); Appendix C Bentley Road, p.2. 	The applicant should not assume that replacement planting removes the deficit. Mature hedgerows, trees and habitats lost to cabling, roads and EACN works may take decades to replace and during that period there is a real ecological and landscape deficit.	Localised ALBA examples showing time to maturity for hedgerow, tree and habitat replacement.
BIO 2.14 - Final BNG metric and securing BNG measures	High	<ul style="list-style-type: none"> Statutory Consultation Response, pp.7-15 and pp.30-34; Route Alignment Report, Section 6; Targeted Consultation Response, pp.6-7. 	BNG must be secured through final approved documents, not left to later negotiation without transparent approval. In ALBA, mitigation land may interact with other projects and must be mapped cumulatively.	Certified Final BNG Report and local authority/NE approval mechanism.
BIO 2.15 - Five Estuaries and North Falls mitigation/enhancement areas	Very high	<ul style="list-style-type: none"> Targeted Consultation Response, pp.1-2 and 12; Joint Substations Design Guide comments, pp.1-3; Route Alignment Report, pp.5-8, 28-31 and Appendix H; APC Representation, pp.7 and 10-12. 	Five Estuaries and North Falls are not separate background schemes for ALBA. Their substations and cabling are functionally connected with EACN and materially contribute to the cumulative burden. The Parish Councils ask for confirmation from the windfarm promoters that N2T will not frustrate their mitigation, enhancement or BNG commitments.	A plan showing all mitigation/enhancement/BNG areas for N2T, Five Estuaries and North Falls.
BIO 2.16 - Impact on other projects mitigation measures	High	<ul style="list-style-type: none"> Targeted Consultation Response, pp.1-2; Route Alignment Report, Section 9; Joint Substations Design Guide comments, p.3; Preparation for Submission, cumulative effects extracts. 	The Parish Councils support the ExA request. The Applicant should not rely on general coordination assurances. Where N2T infrastructure overlaps or constrains other consented mitigation, the Applicant should identify the land, the receptor, the conflict, the developer engaged, the agreed solution and the DCO mechanism securing it.	Cconflict register with plot-level mapping.
BIO 2.17 - Assessment of cumulative effects on biodiversity	Very high	<ul style="list-style-type: none"> Targeted Consultation Response, pp.1-2, 6-7 and 12; Statutory Consultation Response, pp.7-15 and pp.30-34; Route Alignment Report, Section 6 and Section 9. 	The Parish Councils maintain that assessment only by built footprints is inadequate. Cumulative biodiversity effects must include cable corridors, construction compounds, access routes, hedgerow removal, mitigation areas, overlapping programmes and mobile species.	Cable corridors and construction timing for windfarm projects should be included.
DCO 2.S3 - Requirement 4: Construction Management Plans 1	High	<ul style="list-style-type: none"> APC and LBPC Response to ExQ1, pp.8-13; Statutory Consultation Response, pp.18-20 and pp.30-34; Examples of Residents Submissions, pp.1-8. 	There should be stronger complaints management. ALBA residents will face prolonged cumulative construction. A basic complaints log is insufficient; response times, escalation, liaison with parish councils and publication of complaint themes should be secured.	DCO/CoCP wording requiring named community contact and response deadlines.
DCO 2.S6 - Requirement 4: Noise and vibration	High	<ul style="list-style-type: none"> Statutory Consultation Response, pp.18-20; Examples of Residents Submissions, pp.1-8; Route Alignment Report, Sections 4 and 10. 	ALBA needs routine monitoring, clear triggers and action thresholds because construction traffic and EACN works may overlap with other major schemes. Reliance on best practicable means without transparent monitoring is insufficient.	Baseline monitoring at representative ALBA receptors and monitoring during peak construction.
DCO 2.S8 - Bentley Road / PAR30 NSRs	Very high	<ul style="list-style-type: none"> Appendix C - Bentley Road (PAR30) Visualisation Request, pp.1-5; Targeted Consultation Response, p.10; Viewpoints Report, pp.4 and 25; 	Bentley Road should be treated as a key ALBA issue. The permanent widening/straightening, hedge and tree loss, ditch impacts, drainage risk and construction traffic effects have not been adequately visualised or assessed. Mitigation should apply to all affected NSRs and receptors, not only a named property.	Bentley Road photomontages, noise/vibration mitigation schedule and drainage assessment.

		<ul style="list-style-type: none"> Statutory Consultation Response, road construction section (pp.32-33). 		
DCO 2.S9 / HE 2.10 / HE 2.13 - Archaeology and AMS/WSI	Very high	<ul style="list-style-type: none"> Historic Environment Submission, Sections 5-9 and 13-14 (pp.24-46); Route Alignment Report, Section 5 (pp.10-17); Ardleigh History and Heritage Survey, pp.1-3 and asset tables; Appendix A viewpoint evidence. 	Archaeology in Ardleigh is not a peripheral issue. The Scheduled Monument and wider Ardleigh cropmark complex, Roman roads and non-designated assets require robust pre-commencement control. Geophysical survey should not be treated as sufficient where known limitations exist.	Site-specific WSI, trial trenching strategy and Historic England/local authority agreement before relevant works.
DCO 2.S10 - Construction Hours	High	<ul style="list-style-type: none"> APC and LBPC Response to ExQ1, pp.8-10; Statutory Consultation Response, pp.30-34; Examples of Residents Submissions, pp.1-8. 	The Parish Councils support restrictions on Weekends and bank holidays. ALBA residents may face overlapping construction from N2T and related projects; weekend working would remove meaningful respite.	ALBA-specific programme modelling showing effect of removing Sundays and bank holidays.
DCO 2.S11 - Trees, woodland and hedgerows	High	<ul style="list-style-type: none"> Appendix C Bentley Road, p.2; Statutory Consultation Response, pp.7-15 and 32-33; Viewpoints Report, pp.21-25; Targeted Consultation Response, pp.6-7 and 10. 	Parish Councils support stronger pre-construction arboricultural controls. The loss of mature hedgerows and trees along Bentley Road and around the EACN cannot be treated as easily replaceable. Method statements and tree protection plans should be approved before works.	Plot-level tree/hedgerow removal and retention plans for ALBA.
HE 2.1 - Methodology	Very high	<ul style="list-style-type: none"> Historic Environment Submission, Sections 1-4 and 13-14; Ardleigh History and Heritage Survey, pp.1-3; Route Alignment Report, Section 5; Viewpoints Report, Sections 4.1-4.2. 	The methodology must account for Ardleigh heritage density, setting and cumulative visual intrusion. A purely asset-by-asset approach understates the effect of pylons, EACN and cable works around a historic settlement.	Applicant to address heritage setting cumulatively for St Marys, Conservation Area, Scheduled Monument and Roman roads.
HE 2.3 - Grouping of heritage assets / HE 2.4 - Multiple assets	Very high	<ul style="list-style-type: none"> Historic Environment Submission, Introduction and Sections 3-8; Ardleigh History and Heritage Survey, pp.1-3; APC Representation, pp.5 and 9. 	Parish Councils argue that grouping is appropriate only if it increases, not dilutes, understanding of cumulative heritage harm. Ardleigh has 71 listed buildings, a Conservation Area, a Scheduled Monument and many non-designated assets; this density is part of its significance.	A heritage density map and group assessment for Ardleigh.
HE 2.5 - Vibration / HE 2.6 - Limits of Deviation	High	<ul style="list-style-type: none"> Historic Environment Submission, Sections 3-6 and 12-14; Route Alignment Report, Section 5; Viewpoints Report, pp.12-20. 	Limits of Deviation and construction methods may alter effects on heritage assets and buried archaeology. The ES should show worst-case positions and vibration controls for sensitive receptors.	A heritage receptor schedule with vibration limits and LoD worst-case assumptions.
HE 2.8 - Scoped out Heritage Assets	Very high	<ul style="list-style-type: none"> Historic Environment Submission, Section 13 (pp.45-46); Ardleigh History and Heritage Survey, pp.1-3; Route Alignment Report, Section 5. 	Scoping out large numbers of Ardleigh assets risks materially understating harm. The local survey identifies assets and context not captured adequately by standard datasets.	Applicant to explain why each Ardleigh asset was scoped out and whether local survey evidence has been considered.
HE 2.10 - Assessment of impacts on archaeology	Very high	<ul style="list-style-type: none"> Historic Environment Submission, Sections 5-9 (pp.24-33); Route Alignment Report, Section 5 (pp.10-17); Ardleigh History and Heritage Survey, pp.1-3 and asset tables. 	The archaeology around the EACN and pylons is of high potential and the Roman road crossing at or near the proposed EACN site has not been presented coherently. The assessment should not rely on incomplete maps or geophysical survey alone.	A consolidated archaeology plan showing Scheduled Monument, cropmark complex, HER records and Roman roads.
LUS 2.5 - Green infrastructure and open space	Medium-high	<ul style="list-style-type: none"> Historic Environment Submission, Section 10 and Appendix E; Viewpoints Report, Sections 4.3-4.5; Statutory Consultation Response, Landscape/PRoW/Green Spaces section. 	Local green spaces form part of the ALBA recreational, heritage, landscape baseline and the Ardleigh Neighbourhood Plan. Impacts should be assessed cumulatively with visual, PRoW and construction impacts.	Receptor-specific assessment of Local Green Space 1, Glebe Corner and Ardleigh Reservoir.
LV 2.6 - Cumulative Landscape and Visual Assessment methodology	Very high	<ul style="list-style-type: none"> APC and LBPC Response to ExQ1, pp.8-10; 	GLVIA3 factors such as susceptibility, value, scale, distribution and duration point to more serious effects in ALBA than the Applicant has	An ALBA cumulative landscape methodology note.

		<ul style="list-style-type: none"> Viewpoints Report, Summary and Sections 3-5 (pp.3-25); Appendix A, pp.4-39. 	recognised. The methodology should expressly deal with transformation of rural landscape into an infrastructure landscape.	
LV 2.7 - CLVIA response update	Very high	<ul style="list-style-type: none"> Viewpoints Report, pp.3-6; Deadline 4 Submission, pp.1-2. 	The updated cumulative assessment confirms rather than resolves ALBA concerns. Where major adverse and significant effects are identified, it is not adequate simply to say no additional mitigation is required.	Applicant to explain why significant cumulative effects do not trigger additional mitigation.
LV 2.8 - Cumulative Landscape and Visual Assessment - landscape	Very high	<ul style="list-style-type: none"> Viewpoints Report, pp.3-6 and 12-25; Appendix A, pp.4-39; Statutory Consultation Response, Landscape/PRoW/Green Spaces section; Route Alignment Report, Sections 6-9. 	ALBA is a location where landscape character could be transformed by the combined presence of EACN, substations, pylons, cable corridors, road works and Tarchon. The ExA should require a plan showing affected LCAs/VRAs and an explanation of whether the receptor becomes an infrastructure landscape.	ALBA landscape transformation plan and mitigation schedule.
LV 2.9 - Cumulative Landscape and Visual Assessment - visual	Very high	<ul style="list-style-type: none"> Viewpoints Report, pp.8-25; Appendix A, pp.4-39; Appendix B, pp.2-7; Appendix C, pp.2-5; Deadline 4 Submission, pp.1-2. 	The Applicant has not provided adequate cumulative ZTVs, journey scenarios or cumulative visualisations for ALBA. This is essential for Ardleigh Road, Bentley Road, PRoW users, St Marys Church, the Conservation Area and the Scheduled Monument.	Request cumulative photomontages and journey scenarios for Ardleigh Road, Bentley Road and local PRoW network.
LV 2.10 - Cumulative photomontages	Very high	<ul style="list-style-type: none"> Viewpoints Report, pp.3-6 and Section 5; Appendix B correspondence, pp.2-7; Appendix A viewpoint images; Deadline 4 Submission, pp.1-2. 	The Parish Councils support the ExA request for updated cumulative photomontages. The Parish Councils have repeatedly requested visualisations and the refusal to update the 3D model has materially reduced public understanding.	Updated cumulative photomontages from ALBA viewpoints requested by APC/LBPC.
LV 2.15 / LV 2.19 - Landscape viewpoints and 3D Visualisation Tool	Very high	<ul style="list-style-type: none"> Viewpoints Report, entire document; Appendix A; Appendix B; Deadline 4 Submission. 	Existing visual material does not adequately represent ALBA. Additional viewpoints requested by the Parish Councils should be provided, especially where alignment changes or Bentley Road works have not been visualised.	ExA to direct Applicant to provide missing ALBA viewpoint material.
NV 2.1 / NV 2.2 - Noise and vibration	Medium-high	<ul style="list-style-type: none"> Statutory Consultation Response, pp.18-20; Examples of Residents Submissions, pp.1-8; DCO 2.S6/S8 evidence above. 	Noise and vibration conclusions must be tested against worst-case LoD and cumulative construction traffic, particularly around EACN access routes and Bentley Road.	ALBA noise receptor table and construction traffic noise assumptions.
PRoW 2.1 / PRoW 2.2 - Public Rights of Way	High	<ul style="list-style-type: none"> Statutory Consultation Response, Landscape/PRoW/Green Spaces section; Viewpoints Report, pp.8-25; Appendix A, PRoW-related images; 	PRoW effects should be assessed cumulatively, not only as temporary access management. The issue is also visual amenity, sequential experience and loss of rural character.	ALBA PRoW map showing closures, diversions, duration and cumulative visual effects.
SET 2.1 - Socio-economics	Medium-high	<ul style="list-style-type: none"> APC Representation, pp.2 and 7-11; Statutory Consultation Response, Impact on residents/businesses (pp.18-27); Route Alignment Report, Section 4;. 	Socio-economic effects should not be limited to large-scale regional employment. ALBA evidence identifies local businesses, community hubs, tourism and resident wellbeing which may be adversely affected by construction, visual change and industrialisation.	ALBA-specific business and community impact assessment.
TT 2.1 - PARs 1: Ardleigh Road and Bentley Road	Very high	<ul style="list-style-type: none"> Appendix C Bentley Road, pp.1-5; Targeted Consultation Response, p.10; Viewpoints Report, p.4 and Section 5; Statutory Consultation Response, road construction section (pp.32-33). 	The Parish Councils have residual concerns about permanent works to Bentley Road and Ardleigh Road. The roads should be assessed in conjunction with other NSIPs and local schemes. Visual, ecological, drainage and safety effects of road widening and hedgerow removal should be addressed.	Joint NSIP road management plan for PAR30/PAR31, including maintenance, cumulative traffic and restoration.
TT 2.2 - PARs 2	High	<ul style="list-style-type: none"> Appendix C Bentley Road, pp.1-5; Statutory Consultation Response, pp.32-33; 	The Parish Councils support highway authorities in identifying residual PAR concerns. The Parish Councils maintain Bentley Road and Ardleigh Road as ALBA-specific routes where residual concerns remain.	Highway authorities to respond specifically on Bentley Road, Ardleigh Road and EACN access.

TT 2.3 - TT 2.9 - Outline CTMP	High	<ul style="list-style-type: none"> Statutory Consultation Response, pp.30-34; Appendix C Bentley Road, pp.2-5; Targeted Consultation Response, p.10. 	CTMP controls must be enforceable and parish-facing. It is not enough to use reasonable endeavours where residents need reliable notification and controls on routes, timings, driver behaviour, complaints and cumulative traffic.	Parish liaison mechanism and enforceable driver pack compliance.
WE 2.1 - WE 2.3 - Drainage / land drainage	Medium-high	<ul style="list-style-type: none"> Appendix C Bentley Road, p.2; Statutory Consultation Response, Agriculture/Farming and road construction sections; Route Alignment Report, Section 4. 	Road widening and construction across farmland may affect drainage, ditches and flood risk. Bentley Road has ditches on either side and any widening must be assessed before approval.	Drainage assessment specific to Bentley Road, EACN access and affected farmland.
SS 2.1 - Security and resilience	Medium-high	<ul style="list-style-type: none"> Jan 2026 Additional Submission, pp.2 and 4-8; Route Alignment Report, Section 10 (p.31); Targeted Consultation Response, p.3; APC Representation, pp.2 and 8. 	Resilience and emergency access are relevant to siting. The rural road network, BESS proximity and concentration of substations raise risks which should be assessed cumulatively, not in isolation.	Emergency access and incident response assessment for EACN, BESS and nearby substations.

Source Documents Used

[EN020027-003104-N2T ExQ2 22 05 26 FINAL.docx](#) - ExQ2 question list.

[REP3-097 APC and LPC Response to the First Questions 10.pdf](#) - ExQ1 response and cumulative assessment comments.

[NG 5.1 Consultation Report APC Response to N2T Targeted Consultation 27 M.pdf](#) - March 2025 targeted consultation response.

[Relevant Representations Ardleigh Parish Council Representation Norwich.pdf](#) - Registration and Representation, 27 November 2025.

[NG 5.1 Consultation Report Ardleigh PC submission NG stat consultation Ju.pdf](#) - July 2024 statutory consultation main response.

[NG 5.1 Consultation Report Ardleigh PC submission to NG- Historic Environ.pdf](#) - Historic Environment submission.

[NG 5.1 Consultation Report Ardleigh History and Heritage Survey 2024.pdf](#) - local heritage asset survey.

[AS-065 Jan 2026 DCO RESPONSE Route alignment and subs.pdf](#) - Report on Proposed Route Alignment and EACN Substation Siting.

[AS-064 Jan 2026 DCO RESPONSE Additional Submission 27.pdf](#) - Additional submission on behalf of APC/LBPC.

[REP1-145 Response to Deadline 1 Ardleigh and Little Bro.pdf](#) - Deadline 1 comments.

[REP2-032 Deadline 2 Submission APC and LBPC + Encs 1203.pdf](#) - Deadline 2 comments.

[REP4-319 Deadline 4 Submission APC and LBPC 120526.pdf](#) - Deadline 4 visualisation submission.

[REP4-319 Viewpoints and Visualisations in Ardleigh and Little Bromley_Rev 1\[97\].pdf](#) - viewpoint and visualisation report.

[REP4-319 Appendix A - Viewpoint Maps and Images.pdf](#) - viewpoint maps and images.

[REP4-319 Appendix B - Correspondence with the Applicant \(2025\) \[REDACTED\].pdf](#) - visualisation correspondence.

[REP4-319 Appendix C - Bentley Road \(PAR30\) Visualisation Request.pdf](#) - Bentley Road visualisation and drainage/road concern.

[Joint Substations Design Guide - Ardleigh PC Co.pdf](#) - comments on North Falls and Five Estuaries Joint Substations Design Guide.