

Norwich to Tilbury EN020027-003829: Socio-economics, Recreation and Tourism

The Parish Councils of Ardleigh and Little Bromley (ALBA) are concerned that the Project, including the siting and associated works for the East Anglia Connection Node (EACN), would affect not only land and roads, but also the way residents and visitors use the countryside for recreation, events, walking, cycling, horse riding and local leisure. This paper distinguishes between effects which the Environmental Statement itself identifies as significant residual EIA effects and other effects which are assessed as non-significant, but which remain locally important in functional and community terms.

Permanent loss of recreational asset near Ardleigh

The clearest adverse effect is the fishing lake north-west of Ardleigh. National Grid identifies that this asset would require permanent closure and assesses this as a permanent, long-term, moderate adverse and significant residual operational effect. That is a direct admission of significant harm in the Ardleigh area. The assessment should identify precisely which land take, work or operational requirement is responsible for the closure, whether the lake is publicly accessible or membership-based, and, so far as evidence is available, the number and type of users affected. Separate discussions on compensation are referred to, but compensation discussions do not reduce the environmental effect and should not be treated as secured mitigation unless an enforceable replacement facility, equivalent provision or other binding mitigation is identified in the DCO. The Parish Councils therefore challenge any approach which records the recreational loss while leaving the remedy uncertain.

Public Rights of Way in Little Bromley would be permanently altered

The paper identifies effects on several Little Bromley footpaths. The Parish Councils will need to check every PRoW number, closure duration and length of permanent alteration against the latest PRoW schedule and plans, but the present assessment identifies effects on Little Bromley 15, 14, 13 and 7. These include temporary closures, managed access or diversions during highway verge, compound, cable or road-widening works, and short permanent alterations including shortening or diversion of sections of the network. Although these effects are generally presented as negligible or not significant in EIA terms, that classification does not answer the local functional concern. In a small rural parish, even short permanent changes may matter because they affect connectivity between routes, perceived safety, accessibility for less mobile users, amenity, and the practical usability of the wider walking network.

Ardleigh bridleway and equestrian use would be affected

Ardleigh 2 bridleway is identified as being temporarily closed, with managed access during haul road construction works. It would also be temporarily closed and diverted for underground 11 kV cable installation. The assessment should specify whether managed access will in fact remain available throughout the relevant works, the standards by which that access will be kept safe for walkers and horse riders, and what alternative arrangements will apply if managed access cannot be maintained. God's House Farm, CO7 7QQ, has been identified as an equestrian stable in Section C but rates its sensitivity as low. That may understate the importance of equestrian activity in this rural area, where users are particularly sensitive to construction traffic, road widening, HGVs, noise, diversions and loss of quiet lanes.

Local events depend on quiet rural roads

The paper identifies the Little Bromley 10 km Run, the Corbeau Seats Rally and Tour de Tendring. The Little Bromley 10 km Run is an annual local event using roads surrounding Little Bromley and had around 170 confirmed entries in 2025. The Corbeau Seats Rally uses local roads around Ardleigh, Great Bromley, Frating, Great Bentley, St Osyth, Clacton-on-Sea and Tendring. Tour de Tendring is a cycling event using local roads in Tendring. These examples are important because they demonstrate that the rural road network is itself a recreational and community asset. Construction traffic, road widening, abnormal load movements and access restrictions could undermine that function unless event-specific arrangements are defined and secured.

Mitigation for local events is weak

National Grid proposes mitigation measure S05 in relation to events such as the Little Bromley 10 km Run, Corbeau Seats Rally, Tour de Tendring and Ford Ride London-Essex 100. The present formulation is too weak if it merely states that the undertaker will seek to work with event organisers. The Parish Councils request defined commitments, including consultation with event organisers and affected parish councils by a specified period before each relevant event; a published event-management plan; avoidance of identified event dates where reasonably practicable; safe temporary traffic and access arrangements; clear notice periods; a named community liaison contact; and a dispute-escalation mechanism if agreement cannot be reached.

Business, supply-chain and reputational effects may be understated

Colchester City Council raised concerns that the assessment does not capture supply-chain impacts or reputational impacts on businesses. National Grid's response is that these matters are outside the agreed scope of the assessment. On the present material, the Parish Councils do not put this point as a proven significant EIA effect. Rather, it is a remaining assessment gap. The assessment should identify any particular rural businesses, recreation providers, equestrian facilities, events, visitor activities or access-dependent enterprises that may be affected, and should explain whether impacts on reputation, rural setting, access and visitor confidence have been considered. Without that work, a narrow access-based assessment may miss real local economic harm.

Overall concern for the Planning Inspectorate

The assessment accepts one clear significant residual effect: the permanent closure of the fishing lake north-west of Ardleigh. Other effects, including permanent shortening or diversion of Little Bromley footpaths, temporary interference with Ardleigh 2 bridleway, effects on equestrian use, and disruption risks to local events, are generally treated as low, negligible or not significant in EIA terms. The Parish Councils' concern is that those classifications should not obscure their local importance. The Examining Authority should require stronger location-specific commitments for PRoW protection, event management, equestrian safety, construction traffic control, access to rural businesses, and mitigation or compensation for lost recreational facilities. It should also ensure that voluntary community benefits are not treated as a substitute for mitigation, compensation or secured replacement provision for identified harm.

Conclusion: This assessment confirms that Ardleigh and Little Bromley would experience direct socio-economic, recreation and tourism effects from the Project. The most important admitted effect is the permanent closure of a fishing lake north-west of Ardleigh, which is assessed as a significant residual operational effect. Other effects, including permanent changes to Little Bromley footpaths, temporary effects on Ardleigh 2 bridleway, and potential disruption to locally important rural events and equestrian activity, may be assessed as non-significant in EIA terms but remain important to everyday rural life, connectivity, amenity and community wellbeing. Stronger, enforceable and locally specific mitigation is required before consent is granted, and voluntary community benefits should not be relied upon as a substitute for secured mitigation or compensation for identified harm.

Ardleigh Parish Council & Little Bromley Parish Council

Implications of the Draft Statement of Common Ground with Tarchon for the East Anglia Connection Node: EN0200027 003759

1. Introduction

Ardleigh Parish Council and Little Bromley Parish Council submit this Deadline 7 representation to address the implications of the Draft Statement of Common Ground between National Grid and Tarchon. The document is significant because it identifies uncertainty within the Applicant's own coordination material concerning the East Anglia Connection Node ("EACN"), including bay locations, connection interfaces, design responsibility, construction coordination, access, sequencing and cumulative effects.

The Parish Councils do not suggest that every outstanding technical detail must be finally designed before consent. However, where unresolved interface matters may affect the authorised development, compulsory acquisition or temporary possession powers, construction access, safety arrangements, cumulative effects or the environmental assessment, the Examining Authority should not assume that the submitted assessments remain robust unless the Applicant demonstrates that all credible interface outcomes fall within the assessed worst case and within the draft Order limits and limits of deviation.

2. Matters arising from the Tarchon SoCG

2.1 EACN design, bay locations and connection interfaces remain uncertain

For each disputed SoCG topic concerning the EACN, the Applicant should be required to identify the topic number, the current status of agreement or disagreement, National Grid's position and Tarchon's position. That is necessary because the present material records unresolved matters about permanent EACN infrastructure coordinates and designated bay locations, with Tarchon seeking information which National Grid has not yet provided. National Grid appears to attribute at least part of the difficulty to NESO engagement and to acknowledge that the EACN layout has changed since DCO submission.

The significance is not merely that "details remain outstanding". The issue is whether the draft DCO envelope, order limits and limits of deviation already accommodate the range of realistic interface outcomes. If altered bay locations, cable crossings, access requirements, additional land take or changed construction sequencing would fall outside the assessed parameters, or would materially alter the worst case assessed in the Environmental Statement, the EACN cannot safely be treated as sufficiently defined for assessment and land powers purposes.

2.2 Responsibilities and coordination are unresolved

The SoCG also records unresolved responsibility and coordination issues. In particular, it refers to the possibility that Tarchon may be required to design, procure and construct its own bay or bays within the EACN perimeter fence, despite the position previously understood under the 2022 Connection Agreement. That raises issues going beyond contractual allocation. It may affect CDM responsibility, safety management, outage planning, construction sequencing, access control, responsibility for temporary works, the need for land powers and the deliverability of the authorised development.

Tri-party engagement between National Grid, NESO and Tarchon has not, on the material presently available, resolved these issues. The Parish Councils' concern is therefore not simply one of administrative tidiness. It is that unresolved interface responsibility may translate into late design changes, altered access requirements, further temporary possession, additional construction activity, revised safety arrangements and cumulative impacts on communities including Little Bromley and Ardleigh.

2.3 Assessment consequences and cumulative effects

The unresolved matters may affect several categories of assessment conclusion. Altered bay locations could affect landscape and visual impact, noise, lighting, drainage, ecological effects and the relationship with nearby receptors. Cable crossings and interface works could affect construction methodology, safety, outages, programme and cumulative construction disturbance. Access requirements could affect local roads, traffic management, verge and hedgerow impacts and landowner disruption. Additional or different land take could affect compulsory acquisition, temporary possession, agricultural holdings and mitigation. Changed construction sequencing could affect the duration and overlap of impacts with North Falls Offshore Wind Farm, Five Estuaries Offshore Wind Farm and other connecting projects.

Those matters engage environmental assessment, land powers, deliverability, safety and cumulative effects. This is particularly significant because Ardleigh and Little Bromley already face the proposed EACN, the existing Little Bromley substation, a consented battery storage facility, multiple cable corridors and proposed converter stations. Unless the Applicant demonstrates that all credible interface outcomes have been assessed as part of the worst case, the cumulative assessment cannot be treated as resting on confirmed or adequately bounded infrastructure.

3. Consequences for the Parishes

Residents and landowners cannot presently understand the final EACN footprint, bay locations, cable routes, access arrangements, temporary and permanent land take, or the extent to which additional compulsory acquisition or temporary possession powers may be required if final interface arrangements change. If further powers could be

required, that is a substantive examination issue and not merely a matter of post-consent design evolution.

The Parish Councils also reiterate their long-standing position that the EACN is inappropriately sited. It would concentrate substantial grid infrastructure in a rural area already affected by energy development, with unacceptable consequences for landscape character, residential amenity, local roads, tranquillity and nearby settlements. The present uncertainty reinforces those concerns because it is not yet clear whether the assessed scheme, the land powers sought and the deliverable interface solution are the same thing.

4. Requests to the Examining Authority

The Parish Councils respectfully request that the Examining Authority require the Applicant to:

- provide, for every disputed matter in the Tarchon SoCG concerning the EACN, the relevant SoCG topic number, the current status, National Grid's position and Tarchon's position;
- provide a final interface plan or schedule identifying, for Tarchon, North Falls and Five Estuaries, the coordinates of relevant connection points and bays, responsibility for design and construction, construction party, access route, sequencing assumptions and interaction with the other connecting projects;
- explain, with documentary support where available, how the unresolved NESO and Tarchon matters affect the deliverability and assessed envelope of the authorised development;
- demonstrate whether altered bay locations, cable crossings, access requirements, land take, construction sequencing or responsibility for works could materially change any environmental assessment, cumulative effects assessment, safety assessment, traffic assessment, land powers case or deliverability conclusion;
- confirm whether any further compulsory acquisition or temporary possession powers could be required, and if so explain how that is to be addressed within the present Examination; and
- identify any proposed "no material departure" control, further-assessment mechanism or equivalent requirement to ensure that final interface arrangements cannot move outside specified parameters without proper assessment and examination.

5. Conclusion

The Draft SoCG with Tarchon provides important evidence that key EACN interface matters, central to the Norwich to Tilbury Project, remain unresolved. The Parish Councils' position is not that consent is impossible unless every technical detail is fixed. It is that the Examining Authority should not assume that the submitted

assessments remain robust unless the Applicant demonstrates that all credible interface outcomes fall within the assessed worst case, the draft Order limits, the limits of deviation and the land powers sought.

For Ardleigh and Little Bromley, this uncertainty affects landowners, residents, local roads, cumulative infrastructure pressure, construction disruption, safety, deliverability and confidence in the process. The Parish Councils therefore request that the Applicant be required to provide a clear, documented interface plan and to demonstrate that any unresolved NESO, Tarchon, North Falls and Five Estuaries matters are either fully within the assessed and authorised envelope or are subject to an adequate control and further-assessment mechanism before any recommendation is made.

Norwich to Tilbury Project (EN020027)

Concerns for Ardleigh and Little Bromley arising from National Grid Document 8.30

Submitted on behalf of Ardleigh Parish Council and Little Bromley Parish Council

Summary of concern

This submission responds to National Grid's Rule 17 response, Document 8.30, Response to Rule 17 Letter received 30 June 2026, Final Issue A, July 2026, submitted in the Norwich to Tilbury Project examination, EN020027. It is submitted on behalf of Ardleigh Parish Council and Little Bromley Parish Council. The response is important because it confirms that a number of matters remain insufficiently assessed, secured or explained, including as-built information, cumulative effects, landscape compensation or offsetting, local access impacts, employment and skills benefits, and the relationship between voluntary community benefit funding and proper planning mitigation.

The principal concern is that Ardleigh Parish Council and Little Bromley Parish Council are being asked to accept a concentration of nationally significant infrastructure and associated construction activity without adequate assessment before determination and without enforceable safeguards specific to the most affected villages. That concern is advanced without prejudice to the Councils' primary objection to the siting of the East Anglia Connection Node in the Ardleigh and Little Bromley area.

The Councils recognise that the project is promoted in the context of the Critical National Priority for nationally significant low carbon infrastructure. However, that does not displace the requirements in NPS EN-1 §§4.2.23–4.2.27 for compliance with the relevant NPSs, application of the mitigation hierarchy, proper cumulative assessment and case-by-case consideration of impacts and controls.

1. As-built information and underground works

The Applicant's position in Document 8.30 is that the draft Development Consent Order does not include a general requirement to provide as-built details to relevant planning authorities, including for underground cable corridors, and it seeks to distinguish examples from other projects on the basis that they involved marine or port-related matters. The matter remains unresolved because the EACN and associated land-based works would create long-term underground and highway interfaces where accurate post-construction information is essential. The information required should include cable alignment, depth, protective measures, drainage interfaces, accesses, easements and reinstatement details. The consequence is practical and continuing: without clear as-built obligations, relevant authorities, landowners, drainage bodies, highway authorities, utilities and those responsible for farming operations and reinstatement would have reduced ability to understand, maintain and hold the undertaker to account for what has been installed. The DCO should therefore secure provision of as-built information to the relevant planning and highway authorities, affected landowners and affected statutory bodies before completion, handover or reinstatement of the relevant works.

2. Cumulative effects remain inadequately controlled

The Applicant's position in Document 8.30 is that some significant intra-project cumulative effects have been identified during construction, including effects driven by landscape and visual impacts and impacts on pedestrians, cyclists and horse riders arising from visual effects, noise, access and delay, but it resists a requirement to revisit the cumulative effects assessment after consent when detailed design and construction programming are known. Two points follow. First, the Examining Authority must have an adequate cumulative assessment before making its recommendation, because the planning balance cannot be properly struck if the combined effects of the EACN, overhead line infrastructure, compounds, access routes, traffic and other nearby infrastructure proposals are materially uncertain. Secondly, if consent is granted, review alone is insufficient: the

DCO should include enforceable coordination, reporting and corrective-action provisions so that final programmes, routes and designs are managed together and adverse cumulative effects are avoided or reduced in practice.

3. Residual landscape and visual effects, compensation and offsetting

The Applicant's position in Document 8.30 is not simply that landscape and visual harm is accepted in general terms, but that specified residual landscape and visual effects cannot be further mitigated owing to the nature of the project and that the mitigation hierarchy therefore leads to offsetting or compensation. That is a material concession where residual effects would be experienced by the communities around Ardleigh, Little Bromley and the EACN-affected area. The unresolved issue is that general discussion of compensation or offsetting does not identify what is to be delivered, where, by whom, by when, or how it will be maintained and enforced. The consequence is that residual harm may be weighed in the planning balance without a secured and locally targeted response. Any compensation or offsetting relied upon should therefore be specific, enforceable and locally targeted, with clear delivery timescales, funding, maintenance arrangements and consultation with Ardleigh Parish Council, Little Bromley Parish Council and affected residents.

4. Local routes, rural lanes and public rights of way

The Applicant's position in Document 8.30 is to rely principally on the Outline Code of Construction Practice and Outline Construction Traffic Management Plan to address impacts on pedestrians, cyclists, horse riders and local access. The matter remains unresolved because those controls are route-wide and generic, whereas the local network around Ardleigh and Little Bromley includes narrow rural lanes, agricultural accesses, walking routes, equestrian routes and roads not well suited to prolonged construction traffic or repeated disruption. The consequence is that local safety, access, amenity and rural recreation impacts may not be adequately controlled at the places where they arise. The DCO should therefore secure route-specific controls for local roads, public rights of way, walkers, cyclists, horse riders and agricultural access, including limits on construction traffic, advance notice, safe temporary arrangements and a responsive complaints and enforcement process.

5. Employment, skills and supply chain benefits

The Applicant's position in Document 8.30 is that the Employment and Skills Plan is a benefit-led document rather than mitigation and that it should not be treated as a formal discharge requirement. The Councils do not suggest that a benefit-led document must necessarily be converted into mitigation. The unresolved issue is the weight to be given to benefits which are not secured with precision. If local jobs, apprenticeships, training and supply-chain opportunities are relied upon in the overall planning balance, but are not measurable, enforceable or locally reported, they should receive correspondingly limited weight. The response also leaves unresolved the cumulative supply-chain pressure from multiple major infrastructure projects in the vicinity, including effects on labour, haulage, accommodation, local roads and local businesses. The ExA should therefore treat unsecured employment and skills benefits with caution and, if any weight is placed on them, require measurable reporting of local outcomes.

6. Community benefit funding is not mitigation

The Applicant's position in Document 8.30 is that a Community Fund of more than £30 million would be available if development consent is granted, but that the fund sits outside the planning and consenting process, is voluntary, is not mitigation and is not used to justify or secure consent. The unresolved issue is the risk of the fund being treated, expressly or implicitly, as soft compensation for planning harm. The consequence is important for the planning balance: voluntary community benefit funding cannot make unacceptable development acceptable and cannot reduce the need for proper mitigation, compensation or enforceable planning controls. The ExA should therefore record expressly that the Community Fund is outside the DCO, voluntary, not mitigation, and not a consideration capable of making otherwise unacceptable development acceptable.

Engagement after the close of the Examination cannot provide certainty on eligibility, governance, allocation, priorities or whether the EACN-affected area will receive a fair and proportionate share.

Requested response from the Examining Authority

- require an adequate cumulative effects assessment before the ExA makes its recommendation, so that the combined effects of the EACN, overhead line infrastructure, compounds, access routes, traffic and other nearby infrastructure proposals are properly understood;
- secure enforceable coordination, reporting and corrective-action provisions for cumulative effects if consent is granted, once final design, construction phasing, traffic arrangements and related project interfaces are known;
- require as-built information for cable alignment, depth, protective measures, drainage interfaces, accesses, easements and reinstatement details to be provided to relevant planning and highway authorities, affected landowners and affected statutory bodies before completion, handover or reinstatement of the relevant works;
- require specific and enforceable landscape compensation or offsetting for Ardleigh, Little Bromley and the EACN-affected area, with clear delivery timescales, funding, maintenance arrangements and consultation with the Parish Councils and affected residents;
- require route-specific controls for local roads, public rights of way, walkers, cyclists, horse riders and agricultural access, including limits on construction traffic, advance notice, safe temporary arrangements and a responsive complaints and enforcement process;
- give unsecured employment, skills and supply-chain benefits only correspondingly limited weight, unless measurable local reporting and delivery commitments are secured; and
- record expressly that the Community Fund is outside the DCO, voluntary, not mitigation, and not capable of making otherwise unacceptable development acceptable.

Overall, National Grid's Rule 17 response does not provide sufficient reassurance for Ardleigh Parish Council and Little Bromley Parish Council. It confirms that significant local impacts remain, while resisting or leaving uncertain the mechanisms that would give affected communities adequate assessment, transparency, enforceable coordination and effective protection.

Source: National Grid, Norwich to Tilbury, Volume 8 Examination Documents, Document 8.30, Response to Rule 17 Letter received 30 June 2026, Final Issue A, July 2026.

Deadline 7 Submission: Noise, Vibration, Traffic and Alternative Solutions

Submitted on behalf of Ardleigh Parish Council & Little Bromley Parish Council

Norwich–Tilbury Project Outline Noise and Vibration Management Plan **EN020027-003834**

This submission summarises Ardleigh Parish Council and Little Bromley Parish Council's concerns about construction-phase noise, vibration and traffic impacts.

The NVMP shows that Little Bromley faces some of the most severe construction impacts on the route. Ardleigh, although not separately assessed, lies next to Section C works and is exposed to cumulative noise, vibration and traffic effects. The Councils remain concerned that National Grid has not properly explored alternative solutions capable of avoiding or materially reducing these harms.

Key Concerns

1.1 Severe Construction Traffic Noise on Bentley Road (Little Bromley)

The NVMP identifies Link PAR 30 (Bentley Road) as the only project route with a large adverse construction traffic noise impact. It includes 16 Noise Sensitive Receptors within 50 m; Jasmine Cottage, 1 m from the road, is predicted to experience a +11.4 dB increase above SOAEL thresholds.

1.2 Vibration Risks to Heritage Assets in Little Bromley

Two of the five project structures identified as at potential vibration damage risk are in Little Bromley: the War Memorial on Church Road and Haywain on Bentley Road. No detailed protection plan is provided.

1.3 Cumulative Impacts on Ardleigh

Ardleigh is not named in the NVMP, despite lying beside the Bentley Road traffic corridor, the EACN substation construction zone, and Section C haul roads, compounds and access tracks.

The NVMP confirms 47 Noise Sensitive Receptors across the project face cumulative noise impacts where activities overlap. Ardleigh should therefore receive a parish-level cumulative assessment.

2 Alternative Solutions Required

The NVMP relies on generic Best Practicable Means, later Main Works Contractor review, and mitigation after impacts have been identified. This is reactive rather than preventative.

Bentley Road is a narrow rural lane with homes as close as 1–5 m from the carriageway. The NVMP identifies a severe impact from HGV construction traffic but does not explain why alternatives were rejected.

Alternatives requiring assessment include temporary haul roads, A-road access points, phasing to reduce peak flows, satellite compounds, quieter methods near Ardleigh, and design changes to avoid vibration risk to the War Memorial and Haywain.

For Ardleigh, alternatives such as relocating compounds, adjusting haul road alignments and reducing overlapping construction activity have not been properly explored.

3 Requests to the Examining Authority

Ardleigh and Little Bromley Parish Councils respectfully request that the Examining Authority require National Grid to:

- Undertake a formal alternative solutions review covering traffic routing, haul roads, compounds and construction methods, including avoiding Bentley Road for HGVs wherever practicable.
- Provide parish-specific cumulative assessment, monitoring and mitigation for Little Bromley and Ardleigh.
- Require continuous noise and vibration monitoring, published data, clear exceedance protocols and bespoke mitigation for affected properties.
- Provide structural surveys, vibration thresholds, emergency stop protocols and protective works for the War Memorial and Haywain.
- Establish monthly parish liaison meetings, advance notice of high-impact works and rapid-response procedures for complaints or exceedances.

Conclusion

The NVMP demonstrates severe impacts for Little Bromley and unassessed cumulative impacts for Ardleigh. National Grid has not adequately explored alternative solutions that would avoid or reduce those harms.

The Councils therefore ask the Examining Authority to require a formal alternatives review, parish-specific assessment and mitigation, heritage protection and effective liaison before construction proceeds.



**Response from Ardleigh Parish
Council and Little Bromley Parish
Council to the National Grid Norwich
to Tilbury DCO Application**

**Impact on the archaeology of
Scheduled Monument (1002146) and
the Ardleigh Cropmark Complex**

Revision: 1

Date: 20 July 2026

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1 Summary

- 1.1 This report supplements previous submissions relating to the Norwich to Tilbury proposals from Ardleigh Parish Council and from Little Bromley Parish Council.
- 1.2 The extensive cumulative impact of the proposed Norwich to Tilbury project on heritage assets in the Ardleigh and Little Bromley area (ALBA), has been highlighted in previous submissions.
- 1.3 This submission focusses on two very significant and interrelated archaeological assets: Scheduled Monument (1002146) and the Ardleigh Cropmark Complex. It raises concerns about the adequacy of the Applicant's heritage baseline, assessment of setting, field evaluation and proposed controls.
- 1.4 The proposal to locate tall infrastructure adjacent to Scheduled Monument (1002146) in Ardleigh would cause harm to its setting. The Parish Councils dispute the Applicant's conclusion of a minor adverse, non-significant operational effect, particularly given the 2025 Targeted Consultation changes and the acknowledged alteration to the monument's rural setting.
- 1.5 Despite repeated requests since 2024 for visualisations relating to this site, these have been declined by the Applicant. ALBA considers the significance of the harm, and the value of the asset provide sufficient justification for such visualisations. Visualisations are vital tools for assessment and provide important information for affected communities.
- 1.6 Scheduled Monument (1002146) is part of a much larger area of significant archaeological interest known as the "Ardleigh Cropmark Complex". The section of the Ardleigh Cropmark Complex immediately north of the scheduled monument would be intersected by the project.
- 1.7 Due to the association with the scheduled monument site and information from credible archaeological reports, this section of the Ardleigh Cropmark Complex is considered to have the archaeological potential to demonstrate equivalent significance to the adjacent scheduled monument.
- 1.8 In submissions since 2022, the Applicant has been advised of the high archaeological potential of this section of the Ardleigh Cropmark Complex but has not used the information to change the routing of the proposed infrastructure and avoid the harm.
- 1.9 ALBA has in the past highlighted that key information was missing from the Applicant's non-designated heritage asset maps. Information on the archaeology of the Ardleigh Cropmark Complex did not appear on the maps supplied by the Applicant until Examination had commenced. Other information that was reported is still missing from the maps.
- 1.10 The inability of geophysical surveys to detect archaeology in the soils of Ardleigh has been highlighted since 2024. Despite this, the Applicant has maintained the use of this technique where the project intersects the Ardleigh Cropmark

Complex, even though trial trenching is used in the adjacent survey areas. This again means that vital information is not being used to inform the design of the project.

- 1.11 Proceeding with the project now in the knowledge that archaeology of potentially equivalent significance to the adjacent scheduled monument is at material risk of disturbance or loss has not been demonstrated to comply with key requirements in Overarching National Policy Statement for Energy (EN-1).
- 1.12 The ability to record the heritage assets impacted by the project is not sufficient. This is reinforced by section 5.9.16 from Overarching National Policy Statement for Energy (EN-1), which echoes Paragraph 218 from the National Planning Policy Framework, “...the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted”.

This report has not been prepared by an expert on behalf of the Parish Council. It covers a number of areas in which the Parish Council cannot profess to have internal expertise. However, it has been produced through extensive research (without the use of A.I), with references to source material appropriately identified. Other material has been identified and produced as the result of local knowledge and it is the Parish Council’s fortune to have identified members of the community who are extremely knowledgeable, if not qualified experts. This should not devalue the points raised in the report, which have been identified as areas of key concern to the local community and so has been produced to assist the Examining Authority to consider those concerns and provide the basis for focused questioning of the applicant.

2 Impact of the proposals on the ALBA Historic Environment

- 2.1 The Ardleigh and Little Bromley area has a very rich heritage. It is believed, for example, that Ardleigh has been continuously settled for more than 3,000 years
- 2.2 Many high value heritage assets would be at risk of harm from the proposed Norwich to Tilbury scheme.
- 2.3 The Applicant's data from desktop surveys shows a continuous chain of designated and non-designated heritage assets along the proposed cable route in Ardleigh.
- 2.4 The historic village centre of Ardleigh would be encircled by pylons. Included in this area is the Ardleigh Conservation Area (CA26), which contains the Grade II* listed St Mary's Church (1112060) and sixteen other designated heritage assets.
- 2.5 The encirclement can be seen in the "*Viewpoint 4.39: Ardleigh Green Lane*" visualisations supplied by the Applicant at deadline 6 [REP6-113]. Photomontage "*Figure: 7.12.F135_VP4.39c*" shows, for example, the addition of a wire scape behind the tower of the Grade II* listed St Mary's Church (1112060) on the far right of the image. This should be considered in conjunction with the images from the 3D visualisation tool in Applicant's document "*8.9.2 Applicant's Response to Second Written Questions*" [REP5-211] Appendix H, LV 2.19 page 396 to 414 (out of 429) and the corresponding baseline images supplied by ALBA residents in ALBA submission [REP4-319]. This is discussed in the main report and appendices of ALBA submission "*Response to the Applicant's deadline 5 submissions relating to visualisations*" [REP6-133].
- 2.6 At the proposed EACN sub-station site there is evidence of a junction between two Roman Roads, as well as a lot of evidence of previous settlements.
- 2.7 ALBA submission "*Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh*" [AS-065]¹ provides an overview of the Ardleigh's historic environment and greater detail is provided in the "*Ardleigh PC submission to NG-Historic Environment*"², as submitted for the Statutory Consultation in July 2024.
- 2.8 This submission focusses on two very significant and interrelated archaeological assets: Scheduled Monument (1002146) and the Ardleigh Cropmark Complex.

¹ https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-001068-Route%20alignment%20and%20substation%20siting%20in%20Ardleigh_1.pdf

² <https://img1.wsimg.com/blobby/go/35e229d7-0729-4580-8608-6221bf69b316/downloads/Ardleigh%20PC%20submission%20to%20NG-%20Historic%20Environ.pdf>

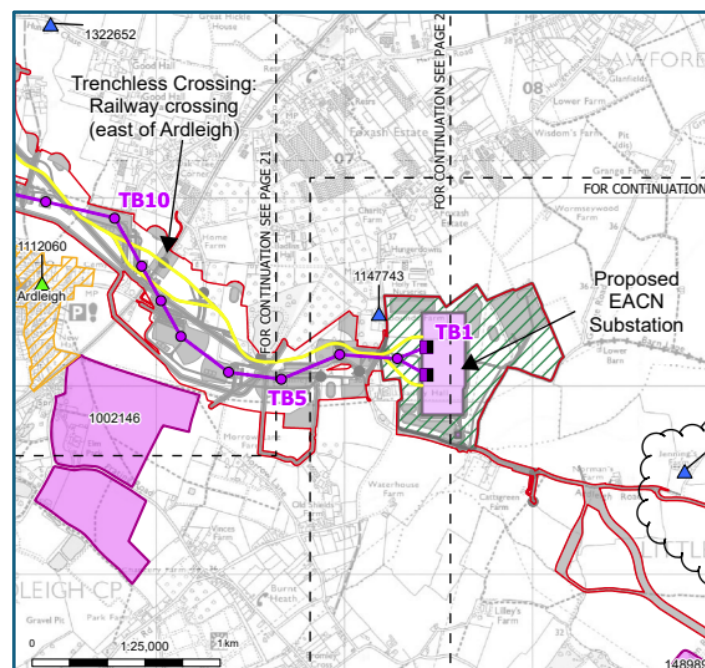
3 Scheduled Monument (1002146)

3.1 Overview

- 3.1.1 Scheduled Monument (1002146) has the title “Crop mark site S of Ardleigh”.
- 3.1.2 The site consists of crop circles showing bronze age burial sites, ditches and trackways. It has produced a huge number of archaeological finds from the earliest Neolithic finds through the Bronze Age, Roman, Iron Age and Saxon periods.
- 3.1.3 The evidence shows that Ardleigh was a flourishing community in the years 1400BC to 800BC.
- 3.1.4 The site is located on a plateau in a landscape which has not changed substantially since these early settlements existed.

3.2 Harm to the setting

- 3.2.1 The proposal to locate tall infrastructure adjacent to the Scheduled Monument in Ardleigh would cause harm to the setting of a high significance asset, and the Parish Councils dispute the Applicant’s conclusion that the operational effect would be minor adverse and not significant.
- 3.2.2 The Applicant’s Zone of Theoretical Visibility (ZTV) maps show widespread visibility of the proposed pylons and EACN substation across the site.
- 3.2.3 The location of Scheduled Monument (1002146) can be seen in the following image copied from the Applicant’s latest map “6.11.F2 Environmental Statement Figure 11.2 - Designated Heritage Assets Assessed in the ES Chapter (Tracked) Version of Deadline 4 Submission” [REP5-123] (page 24/51).



- 3.2.4 The 2025 Targeted Consultation change involved TB5 and TB6 being positioned significantly closer to the Scheduled Monument site and TB6 also becoming an angle pylon.
- 3.2.5 The consequence is 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 59.8m high extended height suspension towers (TB8 and TB9) where the OHL would cross the railway.
- 3.2.6 The 2025 Targeted Consultation change therefore further increases the harm to the setting of the Scheduled Monument.
- 3.2.7 ALBA requested visualisations of Scheduled Monument (1002146) from two viewpoints in response to the invitation from the Examining Authority in “ISH2 Action Points” to submit requests for further visualisations. These were detailed in Ardleigh Parish Council and Little Bromley Parish Council submission “Viewpoints and Visualisations in the Ardleigh and Little Bromley area” [REP4-319].
- 3.2.8 This request was declined by the Applicant in *“Document: 8.4.12 Applicant’s Comments on Post-Hearing Submissions and Interested Party Action Points”* [REP5-194] (3.13 ISH2 Action Point 32).
- 3.2.9 In submission *“Response to the Applicant’s deadline 5 submissions relating to visualisations”* [REP6-133], ALBA stated strong disagreement with Applicant’s statement in [REP5-194] (3.13 ISH2 Action Point 32) that *“...a VP from/across the ‘Crop Mark Site S of Ardleigh’ (1002146) scheduled monument would not contribute to the conclusion of assessment as the archaeology has no above ground remains and therefore this visual element of its setting does not provide a significant contribution to its value. The assessment concluded moderate adverse, significant, effects during construction and minor adverse, not significant, effects during operation (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]).”*
- 3.2.10 This assessment was made by the Applicant despite stating in [AS-070] (page 1077/1784): *“The operation phase of the Project would impact the asset’s setting through the introduction of pylons TB1 to TB8, pulling locations associated with pylons TB4 to TB7, four SuDS basin locations, and the East Anglia connection node Substation. These elements of the Project would be visible from the asset, and they would alter the character of the rural setting of the asset”.*
- 3.2.11 The Parish Councils consider that the rural plateau setting, and the spatial relationship between the scheduled site and the adjoining cropmark complex, contribute to the ability to understand and appreciate the asset’s archaeological significance. That contribution has not been adequately assessed by the Applicant.
- 3.2.12 In the absence of a formal visualisation from the Applicant relating to the Scheduled Monument (1002146), ALBA produced an image to indicate the

height of the nearest pylon from the edge of the site at the intersection between PRow "Ardleigh 28" and PRow "Ardleigh 29" (ALBA "Viewpoint F").

- 3.2.13 The image is shown on page 25 of the appendix to [REP4-319]. It is to be noted that this only shows one of the pylons. Also, the image is of a standard lattice pylon, whereas the pylon in question would be an angle pylon. For comparison an image of an angle pylon was included on page 26 of the appendix to [REP4-319]. Derivation of the apparent height is shown on page 27 of the appendix to [REP4-319].

3.3 Relationship with the Energy National Policy Statements

3.3.1 Section 5.9.3 from Overarching National Policy Statement for Energy (EN-1) November 2023 discusses the setting of heritage assets. The pertinent paragraphs from this Section are copied below:

5.9.3 Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called ‘heritage assets’²²⁹. Heritage assets may be buildings, monuments, sites, places, areas or landscapes, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance.²³⁰ Significance derives not only from a heritage asset’s physical presence, but also from its setting.²³¹

²³¹ The setting of a heritage asset is the surroundings in which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset and may affect the ability to appreciate that significance or may be neutral...

3.3.2 Although Scheduled Monument (1002146) has no visible above-ground archaeology, its setting may still contribute materially to its significance, including by preserving the rural landscape context in which the prehistoric funerary and settlement activity can be understood and appreciated.

3.3.3 Section 5.9.11 from Overarching National Policy Statement for Energy (EN-1) November 2023 discusses the use of visualisations for heritage assets. The pertinent paragraphs from this Section are copied below:

5.9.11 Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact.²³⁶

²³⁶ Relevant guidance is given in the Historic England publication, The Setting of Heritage Assets See <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

3.3.4 Given the acknowledged high value of Scheduled Monument (1002146), and the impact of the proposals on its setting, it would appear reasonable for “*accurate representative visualisations*” to be supplied “*to explain the impact*”. These should also form a key part in assessing the harm.

3.3.5 Section 4.3.12 from Overarching National Policy Statement for Energy (EN-1) November 2023 discusses the need to “*assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been*

properly assessed". The pertinent paragraphs from this Section are copied below:

4.3.12 Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.¹⁰⁶

¹⁰⁶ Case law, beginning with *R v Rochdale MBC Ex p. Tew* [2000] Env.L.R.1 establishes that while it is not necessary or possible in every case to specify the precise details of development, the information contained in the ES should be sufficient to fully assess the project's impact on the environment and establish clearly defined worst case parameters for the assessment. This is sometimes known as 'the Rochdale Envelope'.

3.3.6 As discussed in ALBA submissions [REP4-319] and [REP6-133], requests have been made since 2024 for visualisations relating to this location (and indeed other ALBA locations), but these have not been granted.

3.3.7 In response to ALBA's viewpoint requests, document "8.4.12 *Applicant's Comments on Post-Hearing Submissions and Interested Party Action Points*" [REP5-194] (3.13 ISH2 Action Point 32) states the following: "*The Applicant considers that the number of viewpoints assessed in the LVIA (206 across the Project as a whole) is considered to be proportionate and appropriate in relation to the scale of the Project*".

3.3.8 In considering what is "*proportionate and appropriate*" the importance of the asset also needs to be considered. This is reinforced in NPPF section 207, as copied below:

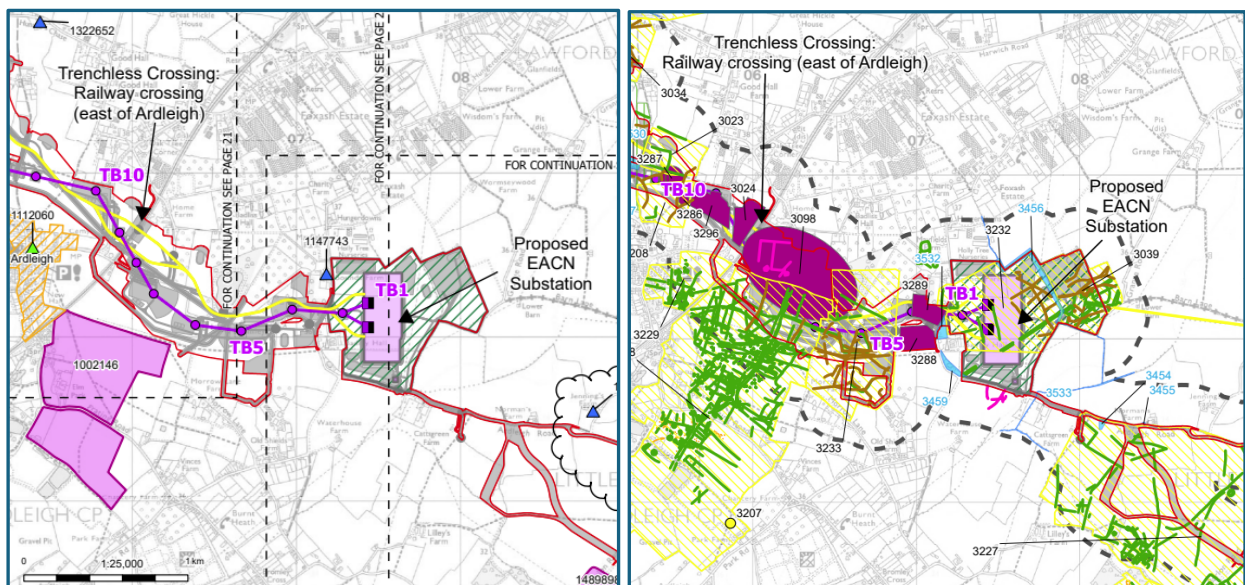
207. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance³.

³ <https://www.gov.uk/guidance/national-planning-policy-framework/16-conserving-and-enhancing-the-historic-environment>

4 Ardleigh Cropmark Complex

4.1 An area of high archaeological potential

- 4.1.1 The designated heritage asset “Scheduled Monument (1002146)”, discussed in the last section, is part of a much larger area of significant archaeological interest known as the “Ardleigh Cropmark Complex”.
- 4.1.2 The following images show this relationship.
- 4.1.3 The image on the left is from map: “6.11.F2 Environmental Statement Figure 11.2 - Designated Heritage Assets Assessed in the ES Chapter (Tracked) Version of Deadline 4 Submission” [REP5-123] (page 24/51). This shows the location of the scheduled monument, as denoted by designation number “1002146”.
- 4.1.4 The image on the right is from map: “6.11.F3 Environmental Statement Figure 11.3 - Non-Designated Heritage Assets Assessed in the ES Chapter (Clean) (Final Issue D)” [REP6-066] (page 15/26). This shows the much greater extent of the Ardleigh Cropmark Complex, which is denoted by the hatched yellow “HER Monument Polygon”. This map also shows in green the “HER Mapped Cropmark Lines”. These appeared in updates to the maps after Examination commenced, as discussed in the next section.



- 4.1.5 As can be seen from the Applicant’s maps, the project would intersect the Ardleigh Cropmark Complex immediately north of the scheduled monument site.
- 4.1.6 The resulting risk of harm to below ground archaeological deposits is of great concern.
- 4.1.7 Most of the boundaries of Scheduled Monument (1002146) are very regular in shape, as this represented the limit of the excavation carried out at the time. The work was apparently restricted by budgetary constraints.

- 4.1.8 The project would be located adjacent to the northern boundary of Scheduled Monument (1002146), which is a perfectly straight line and not one that relates to features of the asset itself. It is therefore a reasonable inference that the high archaeological potential may extend beyond the limits of the scheduled monument site.
- 4.1.9 Archaeological reports confirm that the area immediately north of Scheduled Monument (1002146) is indeed an area of high archaeological potential.
- 4.1.10 Ardleigh is very fortunate to have an historian in the village who has for many years built up an extensive archive of village history. The archive contains many relevant archaeological reports, including the original records from the farmer who initially discovered the archaeology that led to the creation of Scheduled Monument (1002146).
- 4.1.11 Photographs of excavated pottery from Ardleigh are provided in Appendix A. This is a small example of the information held.
- 4.1.12 An important report is “EAA 90, 1999: *The Archaeology of Ardleigh, Essex, Excavations 1955–1980*” by N.R. Brown⁴. This identified two key locations of interest “Areas A & B”, which coincide with the area discussed here.
- 4.1.13 Armed with this knowledge, since the 2022 non-statutory consultation Ardleigh PC has advised the Applicant of the high archaeological potential of this area. This was detailed in submissions by Ardleigh PC to the Applicant and includes comprehensive detail supplied in the Ardleigh PC Historic Environment Report produced for the 2024 statutory consultation. These reports are listed in Appendix B, with links to the documents provided in the footnotes.
- 4.1.14 The matter was raised by Ardleigh residents at the public information events held by the Applicant. Attempts to engage included an offer made by email to the Applicant to visit the village and discuss the unique local records held. The offer was acknowledged but not accepted. The full email chain is provided in Appendix C. No further responses were received from the Applicant.
- 4.1.15 The archaeology here was also highlighted in the Pylons East Anglia (PEA) report: “*Archaeology and the Norwich to Tilbury Proposal*”, which was submitted as part of the 2024 Statutory Consultation. A copy of this report is provided in Appendix D.
- 4.1.16 The Applicant was also provided with similar information on the archaeological potential from other sources. For example, Place Services highlighted the likely importance of this area in June 2024 as part of the response to the Preliminary Environmental Impact Report (PEIR): “*The area of cropmarks that are scheduled form only part of the extensive cropmark complex in the Ardleigh area which comprises a wide range of multi-period settlement, field systems, and burial grounds and these need to be appropriately assessed as **many of them form an***”

⁴ <https://eaareports.org.uk/aaa90>

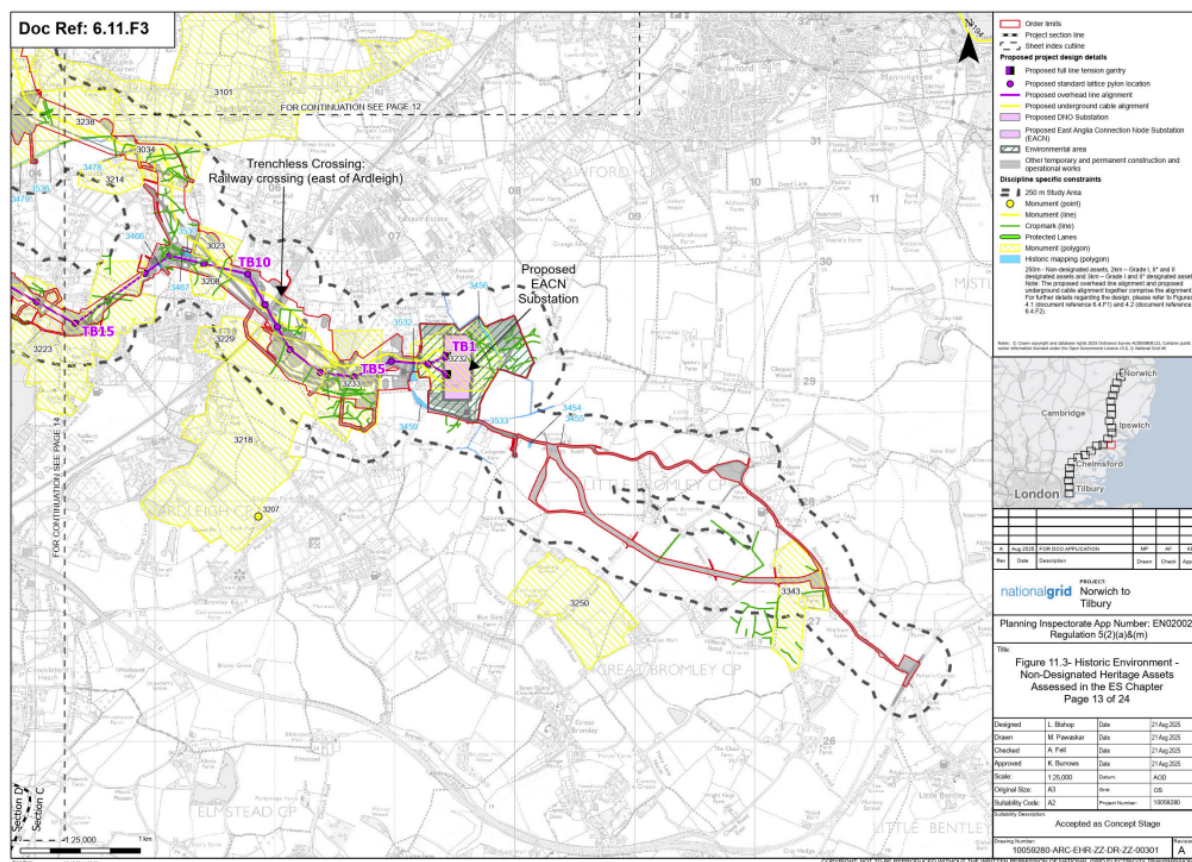
extension to the Scheduled area and are likely to be of a similar importance⁵ (emphasis added).

4.2 Non-designated heritage assets maps supplied by the Applicant

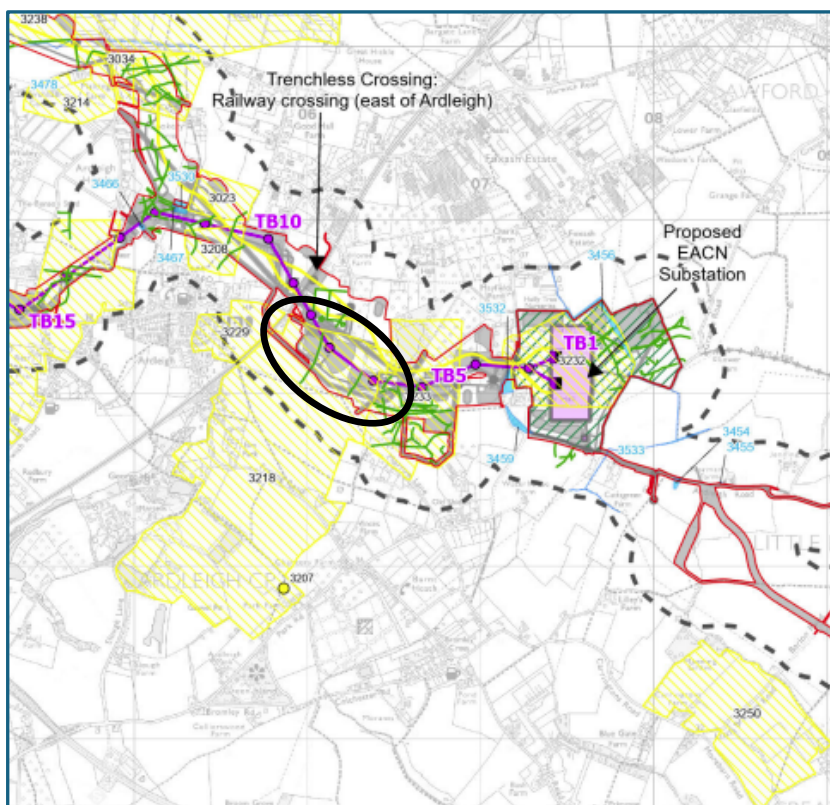
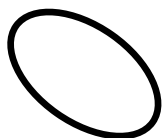
- 4.2.1 The submissions from Ardleigh PC highlighted deficiencies in the Applicant's maps in relation to heritage assets.
- 4.2.2 The deficiencies included, for example, not showing both Roman road routes that intersect the proposed EACN site and not highlighting the archaeological potential where the proposed project intersects the area north of Scheduled Monument (1002146).
- 4.2.3 These deficiencies remained in the maps submitted for the DCO Application, as highlighted in "*Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh*" [AS-065] submitted by Simon Bell on behalf of Ardleigh Parish Council and Little Bromley Parish Council.
- 4.2.4 Shortly after Examination commenced the Applicant issued updated maps showing extensive cropmarks in the area in question, confirming information supplied to the Applicant since 2022. It is to be noted though that the maps still do not show both the Roman road routes that intersect the proposed EACN site. The most recent map, Rev. D, shows one of the Roman road routes (labelled "3168").
- 4.2.5 Copies of the relevant map submitted for the DCO Application and the latest version follow. For each map an enlarged image has been provided, with the area in question highlighted.
- 4.2.6 As can be seen, there are significant differences between the two versions of the maps.

⁵ Norwich to Tilbury NSIP Preliminary Environmental Impact Report (PEIR) Place Services Single

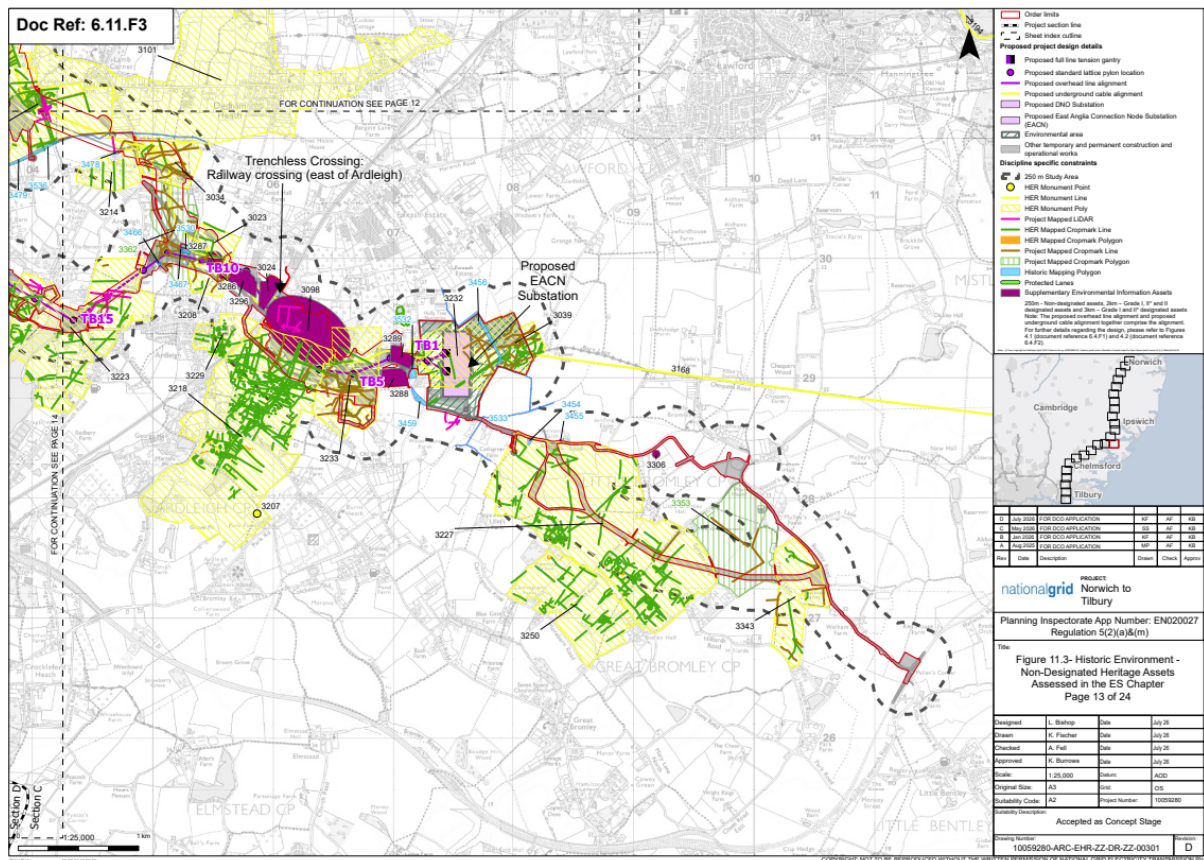
From: 6.11.F3 Environmental Statement Figure 11.3 - Non-Designated Heritage Assets Assessed in the ES Chapter (Final Issue A) [APP-218] (Page 15/26)



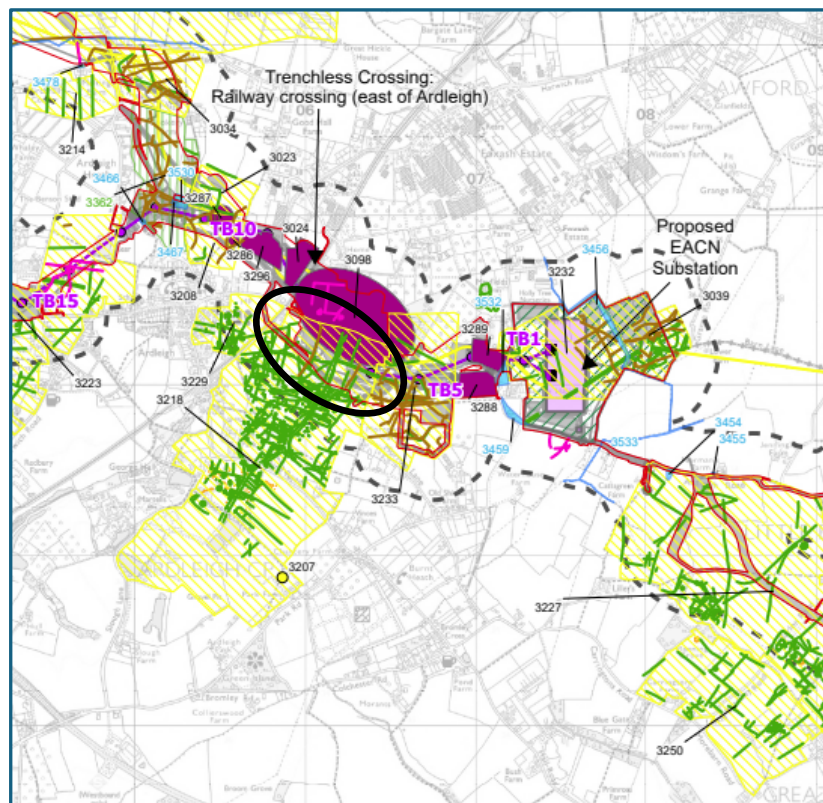
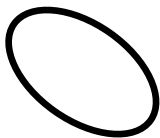
Enlarged image from the above map. The area in question is highlighted here by the black ellipse.



From: 6.11.F3 Environmental Statement Figure 11.3 - Non-Designated Heritage Assets Assessed in the ES Chapter (Clean) (Final Issue D) [REP6-066] (Page 15/26)



Enlarged image from the above map. The area in question is highlighted here by the black ellipse.



4.3 Archaeological surveys

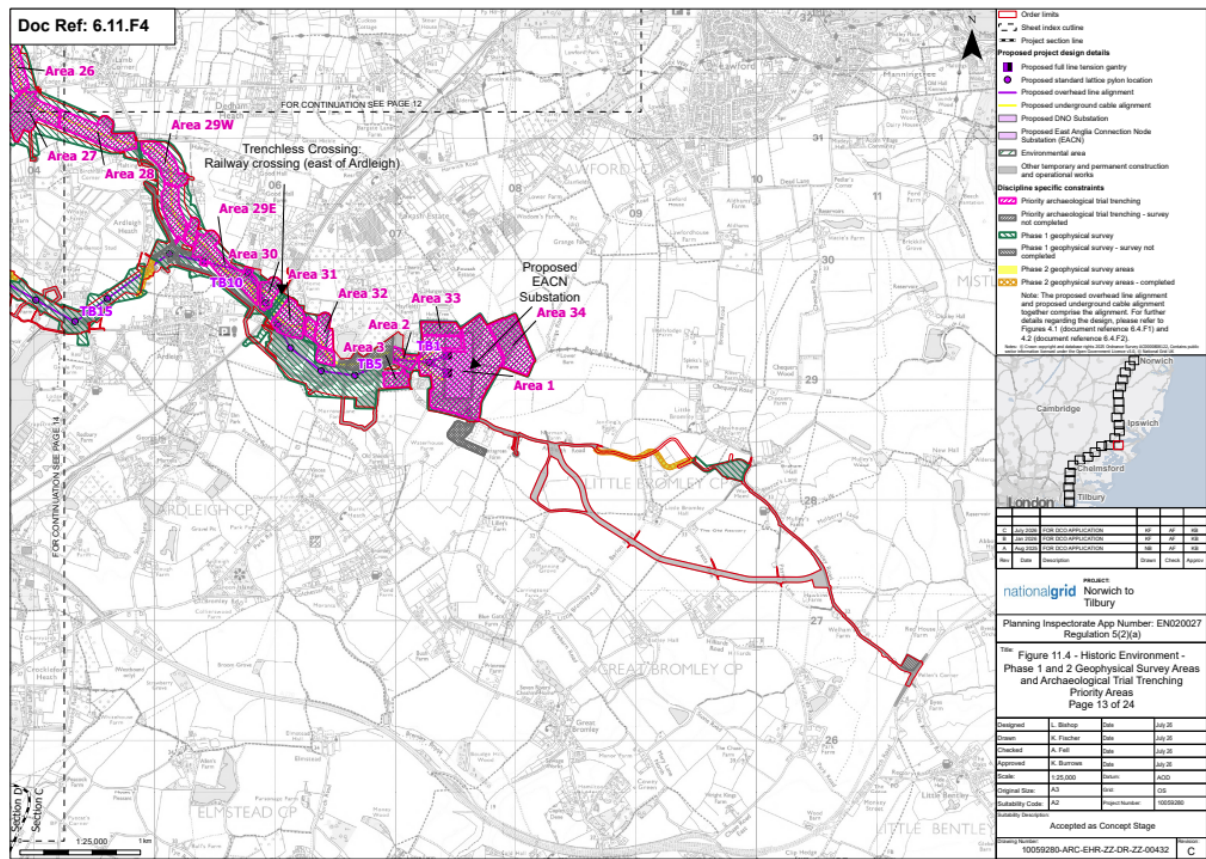
- 4.3.1 One of the Applicant's own archaeological survey reports highlighted the inability of geophysical surveys to detect archaeology in the soils of Ardleigh.
- 4.3.2 The report in question was the EACN Substation Geophysical Survey Report, issued in 2024 for the statutory consultation. It is to be noted that this report also references Roman road (MEX9020), which is the second Roman road that intersects the proposed EACN site and the one that has been omitted from the Applicant's DCO maps.
- 4.3.3 The issues with geophysical surveys referenced in the EACN Substation Geophysical Survey Report were highlighted in Ardleigh PC's Historic Environment⁶ submission for the 2024 statutory consultation.
- 4.3.4 The issues were highlighted again by Ardleigh PC in its response to the 2025 Targeted Consultation because the Applicant used the results from geophysical surveys to inform the proposed changes.
- 4.3.5 The limitations of geophysical surveys in the area are also highlighted in the Essex County Council Local Impact Report [REP1-161]:

"While there appears to be some corroboration between the geophysical results and the features identified during trial trenching the reliability of the geophysical survey to detect archaeological features has been demonstrated to be inconsistent. The geophysical survey report (APP-211) suggests the likely poor magnetic contrast is due to the sandy nature of soils accounting for apparent lack of visibility. This is significant in areas such as Colchester and Tendring District where sandy soils are widespread. In addition, there are archaeological features that are of a nature and scale that are difficult to detect through geophysical survey and aerial photographic assessment. These include features such as cremations, small pits, graves and post holes which could represent sites of high significance".

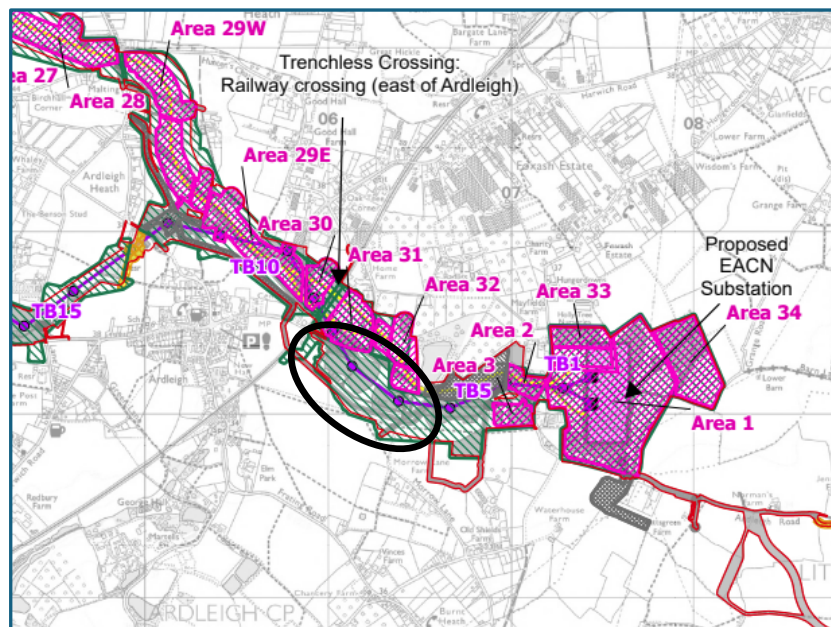
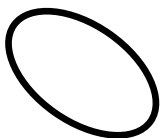
- 4.3.6 Despite the substantial evidence of high archaeological potential where the project intersects the Ardleigh Cropmark Complex, and the acknowledged limitations of geophysical survey techniques in the immediate area, the Applicant has continued to rely on data from geophysical surveys.
- 4.3.7 This is illustrated in the Applicant's geophysical survey areas and archaeological trial trenching maps. A copy of the latest version of the relevant map submitted for the DCO Application follows. An enlarged image has been provided with the map, with the area in question highlighted.

⁶ Page 32 onwards: [REDACTED]

From: 6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas (Clean) (Final Issue C) [REP6-068] (Page 15/26)



Enlarged image from the above map. The area in question is highlighted here by the black ellipse.



4.4 Relationship with the Energy National Policy Statements

4.4.1 Sections 5.9.5 and 5.9.6 from Overarching National Policy Statement for Energy (EN-1) November 2023 are very relevant to the significance of the Ardleigh Cropmark Complex. The pertinent paragraphs from these Sections are copied below:

5.9.5 There are heritage assets that are not currently designated, but which have been demonstrated to be of equivalent significance to designated heritage assets of the highest significance. These are: ...

...those that have yet to be formally assessed by the Secretary of State, but which **have potential to demonstrate equivalent significance to Scheduled Monuments** or Protected Wreck Sites.

5.9.6 Non-designated heritage assets of **archaeological interest** that are **demonstrably of equivalent significance to Scheduled Monuments** or Protected Wreck Sites **should be considered subject to the policies for designated heritage assets**²³⁴.

²³⁴ There will be archaeological interest in a heritage asset if it holds, or may potentially hold, evidence of past human activity worthy of expert investigation at some point.

(emphasis added)

4.4.2 In relation to section 5.9.5 of EN-1, the non-designated heritage assets which form the Ardleigh Cropmark Complex “*have potential to demonstrate equivalent significance to Scheduled Monuments*”, as outlined in Section 4.1 of this submission.

4.4.3 In relation to section 5.9.6 of EN-1, the available evidence establishes a credible potential for remains of equivalent significance and therefore requires adequate field evaluation before the Examining Authority can safely determine their significance, the magnitude of physical impact and the adequacy of avoidance or mitigation.

4.4.4 Sections 5.9.27 and 5.9.28 from Overarching National Policy Statement for Energy (EN-1) November 2023 are very relevant to the conservation and preservation of the Ardleigh Cropmark Complex. The pertinent paragraphs follow:

5.9.27 When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.

5.9.28 The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

- 4.4.5 These sections from EN-1 show therefore the *“importance and weight”* that should be applied to preserving these heritage assets.
- 4.4.6 While further archaeological investigations could be undertaken after Examination to overcome the limitations of the geophysical surveys, this is missing several fundamental points.
- 4.4.7 Credible information has been supplied to the Applicant since 2022, indicating the high archaeological potential of a specific area that would be intersected by the project. The information included peer reviewed archaeological research reports and detailed local knowledge.
- 4.4.8 This information alone should have been sufficient to inform the design of the project and therefore avoid this harm. Section 3.3.78 from Overarching National Policy Statement for Energy (EN-1) November 2023 states *“In considering the ‘economic and efficient’ approach the network project needs to follow good design, avoidance and mitigation principles...”*. This is core to the mitigation hierarchy outlined in EN-1 where the starting point in the process is to “avoid”.
- 4.4.9 Failing this, detailed archaeological surveys should have been conducted at a much earlier stage, and this should have included extensive trenching noting the limitations of geophysical surveys.
- 4.4.10 Proceeding now in the knowledge that archaeology of potentially equivalent significance to the adjacent scheduled monument is at material risk of disturbance or loss has not been demonstrated to comply with key requirements in Overarching National Policy Statement for Energy (EN-1).
- 4.4.11 The ability to record the heritage assets impacted by the project is not sufficient. This is reinforced by section 5.9.16 from Overarching National Policy Statement for Energy (EN-1), as copied below. This echoes Paragraph 218 from the National Planning Policy Framework, ***“...the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted”***⁷

⁷ <https://www.gov.uk/guidance/national-planning-policy-framework/16-conserving-and-enhancing-the-historic-environment>

5.9.16 A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given.

5 Pylons East Anglia report: “Archaeology and the Norwich to Tilbury Proposal”

- 5.1 As part of the 2024 Statutory Consultation, Pylons East Anglia (PEA) submitted report: *“Archaeology and the Norwich to Tilbury Proposal”*.
- 5.2 The report assessed the archaeological methodology employed by the Applicant and then focussed on five archaeological locations along the proposed route.
- 5.3 Ardleigh was one of the locations chosen and the report covered the archaeology discussed in this document.
- 5.4 A full copy of the PEA archaeology report is provided in Appendix D. It has been copied in full, with permission from PEA, because it does not appear to be in the examination library. It is very relevant to ALBA and to the project as a whole.
- 5.5 As discussed in section 3.2 of this submission, the subsequent 2025 Targeted Consultation changes resulted in the proposed pylons being moved even closer to Scheduled Monument (1002146), thereby increasing the harm caused.
- 5.6 Section 2 of the Pylons East Anglia report provides an overview of *“Relevant Planning Legislation and Policy”*. The first two paragraphs are copied below:

Archaeological remains are protected under national planning legislation, in particular the Ancient Monuments and Archaeological Areas Act 1979, as amended by the National Heritage Act 1983 (updated in 1997 and 2002). These acts provide specific protection for archaeological monuments of national significance.

The Planning (Listed Building and Conservation Areas) Act 1990 states that special regard should be given to the “desirability of preserving the building or its setting”. This is also applied to archaeological remains, as well as historic buildings, in that special regard should be given to preserving the “setting” of archaeological remains. This has been further confirmed in relevant case law.

6 Conclusions

- 6.1 The extensive cumulative impact of the proposed Norwich to Tilbury project on heritage assets in the Ardleigh and Little Bromley area (ALBA), has been highlighted in previous submissions.
- 6.2 This submission focusses on two very significant and interrelated archaeological assets: Scheduled Monument (1002146) and the Ardleigh Cropmark Complex. It raises concerns about the adequacy of the Applicant's heritage baseline, assessment of setting, field evaluation and proposed controls.
- 6.3 The proposal to locate tall infrastructure adjacent to Scheduled Monument (1002146) in Ardleigh would cause harm to its setting. The Parish Councils dispute the Applicant's conclusion of a minor adverse, non-significant operational effect, particularly given the 2025 Targeted Consultation changes and the acknowledged alteration to the monument's rural setting.
- 6.4 Despite repeated requests since 2024 for visualisations relating to this site, these have been declined by the Applicant. ALBA considers the significance of the harm, and the value of the asset provide sufficient justification for such visualisations. Visualisations are vital tools for assessment and provide important information for affected communities.
- 6.5 Scheduled Monument (1002146) is part of a much larger area of significant archaeological interest known as the "Ardleigh Cropmark Complex". The section of the Ardleigh Cropmark Complex immediately north of the scheduled monument would be intersected by the project.
- 6.6 Due to the association with the scheduled monument site and information from credible archaeological reports, this section of the Ardleigh Cropmark Complex is considered to have the archaeological potential to demonstrate equivalent significance to the adjacent scheduled monument. Sections 5.9.5 and 5.9.6 from Overarching National Policy Statement for Energy (EN-1) November 2023 are therefore very relevant, but the question whether the remains are demonstrably of equivalent significance requires proper field evaluation and expert assessment.
- 6.7 In submissions since 2022, the Applicant has been advised of the high archaeological potential of this section of the Ardleigh Cropmark Complex but has not used the information to change the routing of the proposed infrastructure and avoid the harm.
- 6.8 ALBA has in the past highlighted that key information was missing from the Applicant's non-designated heritage asset maps. Information on the archaeology of the Ardleigh Cropmark Complex did not appear on the maps supplied by the Applicant until Examination had commenced. Other information that was reported is still missing from the maps.
- 6.9 The inability of geophysical surveys to detect archaeology in the soils of Ardleigh has been highlighted since 2024. Despite this, the Applicant has maintained the

use of this technique where the project intersects the Ardleigh Cropmark Complex, even though trial trenching is used in the adjacent survey areas. This again means that vital information is not being used to inform the design of the project.

- 6.10 Proceeding with the project now in the knowledge that archaeology of potentially equivalent significance to the adjacent scheduled monument is at material risk of disturbance or loss has not been demonstrated to comply with key requirements in Overarching National Policy Statement for Energy (EN-1).
- 6.11 The ability to record the heritage assets impacted by the project is not sufficient. This is reinforced by section 5.9.16 from Overarching National Policy Statement for Energy (EN-1), which echoes Paragraph 218 from the National Planning Policy Framework, “...*the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted*”.
- 6.12 The Parish Councils therefore ask the Examining Authority to require:
- a. an asset-specific explanation of the contribution made by setting to Scheduled Monument (1002146);
 - b. a representative visualisation from the agreed local viewpoint;
 - c. a response to the EAA 90 Areas A and B evidence, the HER cropmark data and the asserted second Roman road; an explanation of why the field evaluation is adequate despite the acknowledged limitations of geophysics;
 - d. identification of the particular works affecting the cropmark complex and their maximum physical footprint; and, if effects remain uncertain,
 - e. further targeted evaluation and enforceable DCO controls for avoidance, micro-siting, written schemes of investigation, archaeological presence, stop-work procedures, investigation, publication and archiving.

This report supplements previous submissions from Ardleigh Parish Council and from Little Bromley Parish Council.

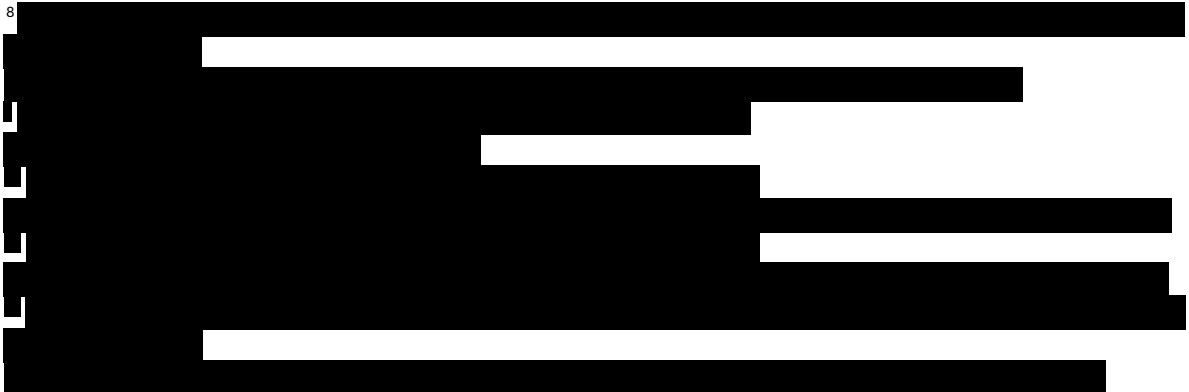
Appendix A: Ardleigh Pottery



Appendix B: Ardleigh Parish Council Consultation Responses

- Ardleigh Parish Council response to the 2022 non-statutory consultation⁸
- Ardleigh Parish Council response to the 2023 non-statutory consultation⁹
- Ardleigh Parish Council response to the 2024 non-statutory consultation (Main report & Historic Environment report)^{10 11}.
- Ardleigh Parish Council response to 2025 Targeted Consultation (Location references: Essex 2 and Essex 4)¹²

8



Appendix C: Email correspondence with the Applicant during the 2024 Statutory Consultation (*redacted*)

From: Contact Norwich to Tilbury <contact@n-t.nationalgrid.com>
Sent: 21 May 2024 09:10
To: [REDACTED]
Subject: Re: [EXTERNAL] Ardleigh History & Heritage

Dear [REDACTED],

Thank you for your email.

This has been received and will be reviewed by our heritage team. They will get back to you with any queries.

With best wishes.

Yours sincerely

Community Relations Team

Norwich to Tilbury

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From: [REDACTED]
Sent: 19 May 2024 21:38
To: Contact Norwich to Tilbury <contact@n-t.nationalgrid.com>
Subject: [EXTERNAL] Ardleigh History & Heritage

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Hello

Please forward this email and the associated attachments to [REDACTED] in the Environment Team.

This summarises a history and heritage survey produced by residents of the village of Ardleigh and was requested by [REDACTED] in a conversation I had with her at the Great

Bromley PIE on Friday 17 May. It is very relevant to the ongoing archaeological survey in Ardleigh.

Ardleigh has an incredibly rich heritage and has been continuously settled since neolithic times. The heritage assets include 71 listed buildings, a conservation area, a scheduled monument, a mass of HER polygons and many other discoveries. It is the belief of local historians that a lot of archaeology remains undiscovered. For example, the bronze age settlements to accompany the large urnfield burial site that forms the scheduled monument have not been found yet. There is also surprise at the lack of Roman villas found in the area considering the large Roman presence. We know for example that two Roman roads cross the proposed site of the EACN substation.

Of great concern also is the close proximity of the proposed infrastructure to the scheduled monument. Not only would this be very detrimental to its setting but, as indicated in the attached document, there is strong evidence that archaeology of equivalent status would be destroyed. This therefore contravenes National Policy Statement EN-1. The straight line that bounds the north of the scheduled monument purely represents the extent of the investigation carried out at the time. These settlements were not constrained by perfectly straight lines. In a similar manner, the railway forms part of the western boundary of the scheduled monument.

Within Ardleigh we have a qualified historian who maintains a comprehensive historical archive of the village, and this includes the original records inherited from [REDACTED] the farmer who first discovered the archaeology that resulted in the scheduled monument. Several residents are also very knowledgeable about the local history. The information held could be very valuable in helping to fill the gaps in the computerised records.

I would very much welcome a meeting with any representatives from National Grid and/or the companies contracted to carry out these surveys so that we can share the knowledge that is held within our community.

Please also let me have confirmation that this information has been received by [REDACTED], as it is very important that it reaches her.

Best wishes

[REDACTED]

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Appendix D: Pylons East Anglia report “Archaeology and the Norwich to Tilbury Proposal”

This report was submitted during the 2024 Statutory Consultation

1. Summary

- 1.1. NGET is failing in its duties to preserve the significance of sites of archaeological interest, to assess the likely worst-case effect of the project and to appropriately mitigate any identified adverse effects. There are a number of weaknesses with the methodology employed by NGET in the PEIR.
- 1.2. Not only that, but NGET is failing in its duty, under Gunning Principles, to give conscientious consideration to consultation submissions which alert it to risks to known (and unknown) archaeological sites, their settings, and the landscape in which they are located.

2. Relevant Planning Legislation and Policy

- 2.1. Archaeological remains are protected under national planning legislation, in particular the Ancient Monuments and Archaeological Areas Act 1979, as amended by the National Heritage Act 1983 (updated in 1997 and 2002). These acts provide specific protection for archaeological monuments of national significance.
- 2.2. The Planning (Listed Building and Conservation Areas) Act 1990 states that special regard should be given to the “desirability of preserving the building or its setting”. This is also applied to archaeological remains, as well as historic buildings, in that special regard should be given to preserving the “setting” of archaeological remains. This has been further confirmed in relevant case law.
- 2.3. The Protection of Wrecks Act 1973 provides protection for wreck sites that the Secretary of State considers likely to contain the remains of a vessel, or its (former) contents, which are of historic, artistic, or archaeological importance. The Historic Buildings and Ancient Monuments Act 1953 makes provision for the compilation of a register of land that is of special historic interest, such as parks, gardens and battlefields. The identified significance of these parks, gardens and battlefields will usually be at least in part due to the presence of archaeological remains.
- 2.4. The National Planning Policy Framework (NPPF) recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not. It goes on to state that *‘in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’*
- 2.5. It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain elements could accommodate change without affecting the significance of the asset. Change is only considered harmful if it erodes an asset’s significance. Understanding the significance of any heritage assets affected and any contribution made by their setting is therefore fundamental to understanding the scope for and acceptability of change.
- 2.6. The NPPF further states that great weight should be given to the conservation of heritage assets, irrespective of the level of harm identified. Any harm to, or loss of, significance of a heritage asset should require clear and convincing justification. This is applied to both physical

loss of the asset, loss of its setting, and collective and group loss of a number of assets and their settings within a collective archaeological landscape.

- 2.7. The identified harm to any heritage assets should be weighed considered alongside other identified adverse effects of the development, and collectively considered against the public benefits of the proposal.
- 2.8. The significance and the setting of a heritage asset is further defined in the National Planning Practice Guidance (PPG). Significance is considered relative to the archaeological, architectural and artistic, or historic interest of the asset. It is stated that all assets have a setting, regardless of their current survival and designation, and that setting can most obviously comprise a visual relationship, but can also be influenced by other factors such as noise, dust, smell, vibration from nearby land uses, and historic relationships.
- 2.9. National planning legislation and policy therefore provides a framework for the protection of archaeological assets, whether designated or not.
- 2.10. Furthermore, archaeological industry guidance issued by Historic England includes additional guidance on the assessment of the significance of archaeological remains, as well as a five-step process for an assessment of potential impacts to their setting.
- 2.11. The government has additionally issued a policy paper entitled Overarching National Policy Statement for energy (EN-1) (dated November 2023). This provides planning guidance for developers of nationally significant energy infrastructure projects.
- 2.12. The policy paper echoes national planning legislation and policy in that it recognises the potential for projects to have adverse impacts on historic environment assets (including archaeology). It specifically mentions that the significance of an asset is derived from both its physical presence and its setting, again echoing national legislation. The paper goes on to state that the Secretary of State must consider the impacts of development on both designated assets and non-designated assets. The paper states that the project should consider the likely **worst-case scenario** (para 4.3.12) to ensure that potential effects of the proposed development have been properly assessed.
- 2.13. EN-1 section 5.9 outlines the process by which historic environment assets should be approached as part of such projects. This includes an assessment of any likely significant heritage impacts. Importantly, it is also mentions that consideration will need to be given to possible impacts, including cumulative, on the wider historic environment. There is specific mention of the historic landscape or seascape needing to be considered.
- 2.14. The paper further echoes national planning legislation in that an applicant is required to describe the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. It states that the level of detail should be proportionate to the importance of the assets. In addition, it states that where an archaeological interest is identified, that an applicant should carry out appropriate desk based assessment and where necessary to properly assess the interest, a field evaluation. Where the setting of an asset is to be affected, accurate representative visualisations may be necessary. The applicant must ensure that the extent of the impact on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Applicants are encouraged to explore possibilities for positive conservation of heritage assets and their settings.
- 2.15. Where consent is granted and the loss of an archaeological asset is considered justified, the paper echoes national legislation in that it requires an applicant to record and advance our understanding of the asset before it is lost.
- 2.16. National Policy Statement EN-5 states that any applicant must have regard to the Electricity Act 1989: “applicants must take into account Schedule 9 to the Electricity Act 1989,

which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to “have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.”

- 2.17. The statement further includes that the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if it is satisfied that the benefits outweigh any extra impacts that may be presented. This includes potential effects of undergrounding on archaeological sites, relative to the overground impacts of setting effects on archaeological sites or other heritage assets.

3. Archaeological Methodology Set out in PEIR

- 3.1. The Historic Environment Chapter 11 of the PEIR includes for archaeological remains, both designated and non-designated, as well as historic buildings (designated and non-designated), and historic landscapes (non-designated). This is supported by a baseline report at Appendix 11.1.
- 3.2. There are a number of weaknesses with the methodology employed here.**
- 3.3. The **study area** (para 11.5.3) was presented at 250m for non-designated heritage assets, including various archaeological remains. Whilst this may be considered suitable for various non-designated archaeological sites, the study area is not suitable in those instances where archaeological remains may extend from a known site and into the 250m study area, or where the setting of archaeological sites are a consideration. It is concerning that all non-designated archaeological assets outside this 250m area were scoped out by the use of this study area. This has meant that numerous archaeological sites will not have been appropriately considered for both physical effects and setting effects.
- 3.4. The **walkover survey** (para 11.5.9) completed to support assessment scoped out any fields that did not meet their stated criteria. This included scoping out fields where no archaeological assets are currently known and missed an opportunity to potentially identify archaeological earthworks that may be present.
- 3.5. The **Setting Survey** (para 11.1.5.16) makes no mention of the setting of archaeological remains. This is incredibly concerning, as archaeological remains ranging from nationally designated Scheduled Monuments through to locally significant archaeological sites do have a setting, as made clear by national planning policy. This section only mentions the setting of historic buildings as being considered. Reviewing the baseline assessment at Appendix 11.1, there is mention of the setting of archaeological Scheduled Monuments, however a full setting assessment has not been completed for each monument in line with Historic England guidance. Any stated conclusions as to the setting of these monuments and potential impacts within that setting cannot therefore be relied on. A full setting assessment must be undertaken to inform the potential impacts to each of these Scheduled Monuments, as well as in the case of any non-designated archaeological assets, in particular those high significance assets that should be treated akin to a Scheduled Monument.
- 3.6. The presentation of **baseline archaeological assets** in tabular form in the PEIR serves to downplay the potential for currently unknown archaeological sites by focusing on known archaeological findspots or sites. It appears to assume that no unknown archaeological assets will be discovered during the project works. In addition, the baseline report at Appendix 11.1

does not appropriately assess the significance of known archaeological assets, merely asserting for each asset whether it has a low to high “value”. This is not an appropriate assessment of significance in line with archaeological standards and must be corrected. There are numerous examples of archaeological sites within the draft order limit that could be considered of high significance and therefore should be treated akin to a Scheduled Monument. In addition, there are further examples of known locally and regionally significant archaeology, and there are likely to be extensive currently unknown archaeological features which need a full consideration.

- 3.7. There is no consideration of potential setting effects on non-designated archaeological remains at the operational phase.
- 3.8. The cumulative effect of the collective loss of a series of archaeological assets across this vast landscape must also be considered.
- 3.9. Interrelationships between archaeological assets and monuments must be considered.
- 3.10. The concluded significance of effect is in many cases downplayed and reduced as far as possible.
- 3.11. The historic landscape is mentioned as having been considered as part of this document, however there is no mention of the historic landscape in the consideration of either Construction Phase Effects or Operational Phase Effects to the historic landscape. Given the scale of the project, including both the length of the route and the height of the pylons, the historic landscape is going to be substantially changed as a result, and there will be a significant effect on the way that this collective landscape is understood. This must be considered appropriately. This should include consideration not only of historic landscape characterisation data, but of historic landscape features such as parish boundaries, county boundaries, and historic field and ownership boundaries, historic areas of woodland, and also the hedgerow regulations which protect hedgerows for a number of reasons including where these are considered of historic or archaeological significance.

4. Sites at risk

- 4.1. We need only look at five examples along the 180km Norwich to Tilbury route, to demonstrate that NGET’s processes with regards to archaeology are not fit for purpose. No doubt, given the extensive prehistoric, Roman, Saxon and Medieval activity in the region, there will be numerous other similar case studies along the route which could demonstrate that NGET have not sufficiently considered the effects of the proposed overhead route on both known and unknown archaeological assets.
- 4.2. NGET has seemingly deliberately placed very significant sites of archaeological interest at very unnecessary risk.
- 4.3. Despite being informed of the following archaeological sites, NGET has done the following:
- 4.4. At Fordham, Essex.**
 - 4.4.1. Located a pylon directly on top of confirmed Roman archaeology in a field directly adjacent to an exceptional and active Roman dig with Stone Bronze and Iron Age finds, a bathhouse and Roman and Saxon burials. This includes one of only two ‘piscina’ (indoor fountain/water feature) known in the country. This site should be considered on a par with a Scheduled Monument, even though not designated.
 - 4.4.2. Located the draft order limit across the site of that Roman dig and covering cropmarks which show two rows of post holes and possible archaeology extending from the dig site.
 - 4.4.3. Located all of the following archaeological sites within the draft order limit: Roman Road; Prehistoric site (extensive flint working); three confirmed Roman sites; Cropmarks

suggesting building, period unknown; Likely Roman building; cropmarks suggesting enclosure and building in field called House Field.

4.4.4. See map in Appendix 1 which gives a stark picture of the impact of NGET's proposals in Fordham. The sites numbered in green are sites of archaeological significance

4.5. At Little Horkesley, Essex. Located a sealing end compound on the site of a suspected Roman Villa.

4.5.1. Residents notified NGET of this in 2022 and 2023. Geophysics indicates very clearly that a slate kiln is likely, in the very location chosen for a sealing end compound.

4.5.2. These sites have all been advised to NGET by Mike Hamilton-Macy (Chairman of Colchester Archaeological Group, Fordham parish councillor and active member of Fordham Local History Society) as follows:

4.5.2.1. Fordham parish council official response. 2022 and 2023.

4.5.2.2. Completed the heritage form on NGET's site. 2024.

4.5.2.3. Sent in another on behalf of one of our farmers, whose land some of the archaeological sites are on. 2024.

4.5.2.4. Phoned NGET directly, advising them that they should get in contact regarding archaeological sites. 2024.

4.5.2.5. Telling NGET of below ground heritage at the first "consultation" in 2022.

4.6. At Great Waltham/Little Waltham, Essex. Scheduled Monument

4.6.1. It is impossible to tell from NGET's mapping whether the current proposed N2T alignment passes directly over the protected site, and whether one of the proposed 50m pylons may be constructed on top of the site. That said, the baseline assessment has identified a "not significant" negative effect to this SM via development within its setting, when even a low impact to a high value asset such as this SM should be a significant effect. The bar for a significant effect in EIA terms is lower than for substantial harm in NPPF terms. Despite this not significant negative effect, NGET has identified a significant effect during construction works. It makes no sense to have a significant effect here but not at the completed development stage. (See pages 108 and 388 PEIR Vol 3 Tech Apps 3 of 4.)

4.6.2. The Scheduled Monument at Ash Tree Corner was discovered in the early 1970s when excavations for a bypass around Little Waltham were being undertaken. An archaeological dig - confined to the foot print of the road - revealed a complex pattern of Mesolithic, early Neolithic, early and late Iron Age, Roman and early and late Medieval settlements. Carbon dating of pottery from the site showed settlement there was present over 5000 years ago, making it one of the earliest such sites in England.

4.6.3. So important was the site that it has been designated by the Secretary of State as a Scheduled Monument of national importance under the Ancient Monuments and Archaeological Areas Act 1979. As such it is a protected site with any damage to it constituting a criminal offence. Artifacts from the site are of museum quality and are displayed at the award-winning Chelmsford Museum.

4.6.4. Although the archaeological excavations were limited to the extent of the bypass it was clear that the Ash Tree site was much more extensive than this. For example, the excavations showed just one corner of a palisaded settlement of huts, indicating that the remainder of the settlement extended some distance westwards towards Great Waltham. The excavations were fully recorded in a book published by the Council of British Archaeology "Excavations at Little Waltham 1970 – 1971" by PJ Drury (copies in the Chelmsford library). The professional archaeologists involved in the dig said that the

settlements were likely to have extended some 500m from the point where the bypass crossed the River Chelmer.

4.6.5. As with the sites at Fordham and Little Horkesley, NGET has been advised numerous times of this site by the Parish Councillor Chair, John Burrows.

4.7. At Ardleigh, Essex

4.7.1. NGET has located a tower (TB007), undergrounding and associated works such as haul roads on land immediately to the north of Scheduled Monument "Crop mark site S of Ardleigh". It makes no sense to identify a significant effect during construction works and then a not significant effect at completed stage. On page 337 of the PEIR, the table says a minor change to the setting, which makes a moderate contribution to its significance, yet this is clearly a significant effect to a high significance asset. List Entry Number: 1002146, where there is known to be un-investigated archaeology. Most of this site also falls within the draft order limit. It is inconceivable that the settlements were limited to the site of the Scheduled Monument. This will therefore result in the destruction of important archaeology. Evidence of the archaeology here is for example provided in the book "The Archaeology of Ardleigh, Essex: Excavations 1955-1980". The location of Areas A and B referenced in this book are shown in the modified version of NGET Figure A11.1 that follows. The boundaries of the Scheduled Monument purely illustrate the extent of the archaeological investigation carried out at the time, hence the straight line on the northern boundary to coincide with a footpath. It is considered highly likely that if properly investigated the Scheduled Monument would cover a much greater area, including land to the north of Little Bromley Road. Therefore, other areas of undergrounding and other proposed towers such as TB005, TB006, TB008, TB009 and beyond are also likely to be significant. See Appendix 2 for maps.

4.7.2. A full archaeological investigation of the land in question must be conducted prior to the submission of the DCO to avoid knowingly inflicting harm on the archaeology.

4.7.3. The Scheduled Monument site consists of crop circles showing bronze age burial sites, ditches and trackways and has produced a huge number of archaeological finds from the earliest Neolithic finds through the Bronze Age, Roman period, Iron Age and Saxon period. The largest Bronze Age urnfield ever found in England was found near Vincens Farm, which shows that a flourishing community existed there in the years 1400BC to 800BC.

4.7.4. The proximity of the proposed overhead lines and towers, the EACN substation and the underground cable swathe would also be very detrimental to the setting of the Scheduled Monument site. The centre line of the proposed 50m high overhead line falls within 263m of the Scheduled Monument boundary and the proposed EACN substation is only 1km away. As a result, across the Scheduled Monument site, there would be the cumulative visual impact from both the overhead lines and EACN. This is clearly illustrated in the Zone of Theoretical Visibility (ZTV) maps within the Preliminary Environmental Information Report.

4.7.5. The NGET Norwich to Tilbury Statutory Consultation 2024 drawings do not show all the Roman Roads in Ardleigh. The only Roman Road shown suddenly ends to the west of the proposed EACN site. There is evidence that this road continued eastwards, passing close to the centre of Ardleigh. A further Roman Road ran from Colchester to Mistley, resulting in the two roads converging at the proposed EACN site. These additional Roman Roads are shown in the modified image from NGET Figure A11.1 that follows.

4.7.6. As shown in NGET Figure A11.1, due to the incredibly rich heritage of the village, the proposed routes of the undergrounding and overhead lines in and out of Ardleigh cut

- through an almost continuous series of non-designated assets around the medieval village centre. This shows no regard for such assets when selecting the routing corridor.
- 4.7.7. As there are heritage assets in the Ardleigh 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”. As such, development of the site would be in breach of the Overarching National Policy Statement for energy (EN-1) as set out above.
- 4.7.8. Detailed information relating to this was provided to NGET in the Ardleigh Parish Council official response to the 2023 non-statutory consultation and followed-up by Ardleigh residents at the 2024 statutory consultation public information events. The nearest section of the underground cable swathe is just 98m away from the northern boundary of the Scheduled Monument site and the draft order limit is just 25m away.
- 4.8. **At Wickham Skeith, Suffolk** – pylons pass over a site thought to be the location of an abbey.
- 4.8.1. It is thought that Wickham Manor at Wickham Skeith was given to Colchester Abbey as an abbey with four monks under the reign of Stephen 1 to grow food for Colchester Abbey. The monks abbey at Wickham Skeith is believed to date to around 1150.
- 4.8.2. There is still a house called Abbey Farm in Wickham Skeith where the gate to the Abbey is believed to be.
- 4.8.3. On Page 178 of the PEIR, NGET has assessed this is as of medium value and that there would be no physical effects. However, NGET has not assessed effects to setting and appears to have ruled this out of further assessment purely on the basis that it is outside the draft order limits. This ignores the fact that archaeological remains have a setting, whether designated or not. This may not be the only example along the route where non designated archaeological remains have not been given proper consideration per setting.
- 4.8.4. NGET has been told by local resident Charlotte Banks in the 2022 and 2023 consultations of the presence of the Abbey at this site yet it is crossed by pylons RG126-123.
- 4.9. The NGET archaeology ‘expert’ at the Langham public information event on 16 May 24 had no knowledge of any community submissions (nor specifically of the above) about archaeology. When she described the process undertaken by NGET, she made it clear that community submissions are never part of the process and that NGET is not interested. This demonstrates a severe breach of Gunning principle no 4.
- 4.10. The process applied by NGET also means that archaeological sites are at risk. Use of the Historical Environment Records alone results in only a headline picture of the number of sites ‘on the ground’. Use of geophysics alone can miss key sites. Thus, the worst-case assessment required in EN1 has not been presented. In fact, it would appear that the worst-case scenario is in fact the one chosen by NGET.

5. Conclusion

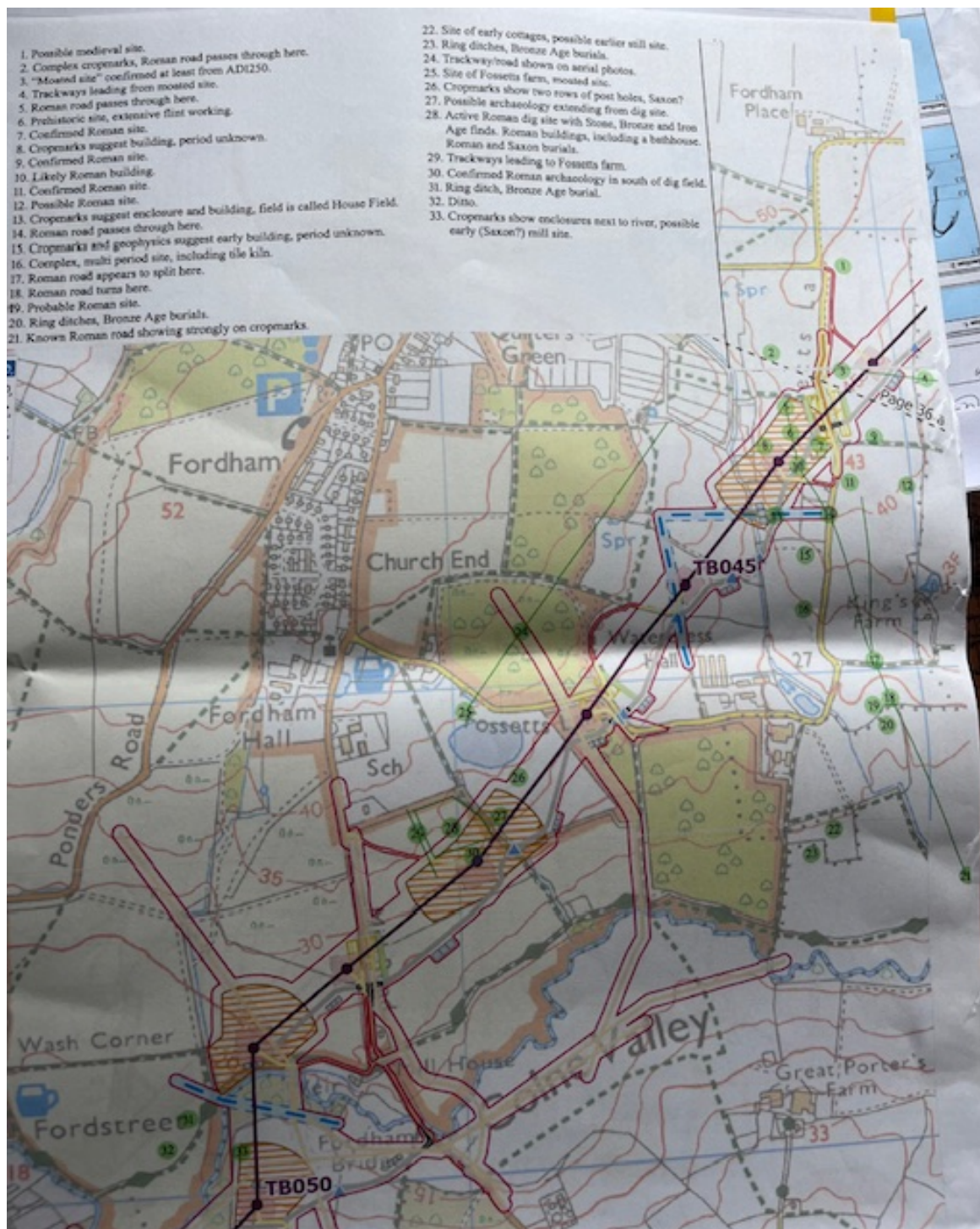
- 5.1. The only way of meeting the obligations of the NPS and Electricity Act 1989 to preserve these sites is to avoid them altogether. Given the high density of archaeological sites in East Anglia, the safest way of doing so is by going offshore. Second best would be carefully managed HVDC undergrounding perhaps with some elements of directional drilling.
- 5.2. The project as proposed brings very significant harm to a series of individual archaeological monuments as well as the collective archaeological landscape, with, in many cases, no attempt to mitigate.
- 5.3. Overall, NGET have clearly not met the requirements of national planning legislation and policy with regards an appropriate consideration of archaeological assets that may be

impacted by the proposed overhead route. Their approach has involved presenting a lot of archaeological data and assigning a “value” to each of those archaeological datapoints. There is insufficient consideration of both the significance and the setting of archaeological remains along the proposed route, and appropriate Historic England industry guidance has not been appropriately applied. Many of these assets have then been scoped out on a very little basis.

- 5.4. The case studies presented here are only a small area of the proposed route and it is certain that there would be further instances where further consideration is merited. In addition, the collective value of the archaeological landscape, relationships between various archaeological assets, and the setting of both individual assets and the collective has not been appropriately considered.
- 5.5. Further archaeological work is needed to assess the proposed route. The PEIR notes that further archaeological fieldwork in the form of geophysical survey and trial trenching will be undertaken likely commencing in late 2023 or early 2024 to inform an Environmental Statement submission. It states that work is likely to continue post submission given the scale of the project / route. It appears that this has been discussed with the relevant archaeological advisors. It is likely that further currently unknown archaeological assets will be identified during the course of this work. In addition, such works will help to further understand the setting of both known and currently unknown assets, as well as the collective archaeological landscape. National policy requires that NGET provide sufficient information at the pre-application stage to enable the Secretary of State to suitably assess the impact of the proposals. Given the high number of archaeological sites along the proposed route, both within the draft order limits and adjacent, it is clear that extensive fieldwork will be required to further inform upon the significance of these sites, the setting of these sites, and the potential adverse impact of the development. This should be undertaken to inform any application, rather than post submission.
- 5.6. Given the high density of archaeological sites along the proposed route, it is clear that the offshore alternative would have the lowest potential impact on archaeological assets. Whilst it is accepted that there could be marine or maritime archaeological assets along any offshore route, these are currently an unknown commodity, whilst the onshore route is known to have a highly detrimental effect on the archaeological landscape.
- 5.7. In the absence of the offshore alternative, the two options are for over-heading or undergrounding. We understand that the proposal for over-heading would involve a strip for a haul road along the route of the project as well as localised works for new substations and infrastructure, and that there would still be a physical negative effect on archaeological remains, in addition to any setting impacts as a result of the construction of large pylons within this landscape. The undergrounding option would involve a 120m wide strip (perhaps as much as 220m wide), however the technology exists to use high voltage cables (HVDC) which would allow for a very greatly reduced 40m wide strip to be undertaken. With this option, it should also be possible to route the cables around the most significant archaeological sites, thereby avoiding both physical and setting impact on key sites as far as possible. A comparison of the over-heading option relative to the underground options concludes that there would be a negative physical impact to archaeological remains in either scenario. Using the HVDC option it would be possible to ensure that this negative impact is fairly similar in either option, related to the strip of the haul road relative to the 40m strip for new cabling. In either option, there would still be a requirement for additional localised infrastructure. The key difference is that undergrounding the route would more readily remove the potential impact on the setting of archaeological and other heritage assets, as

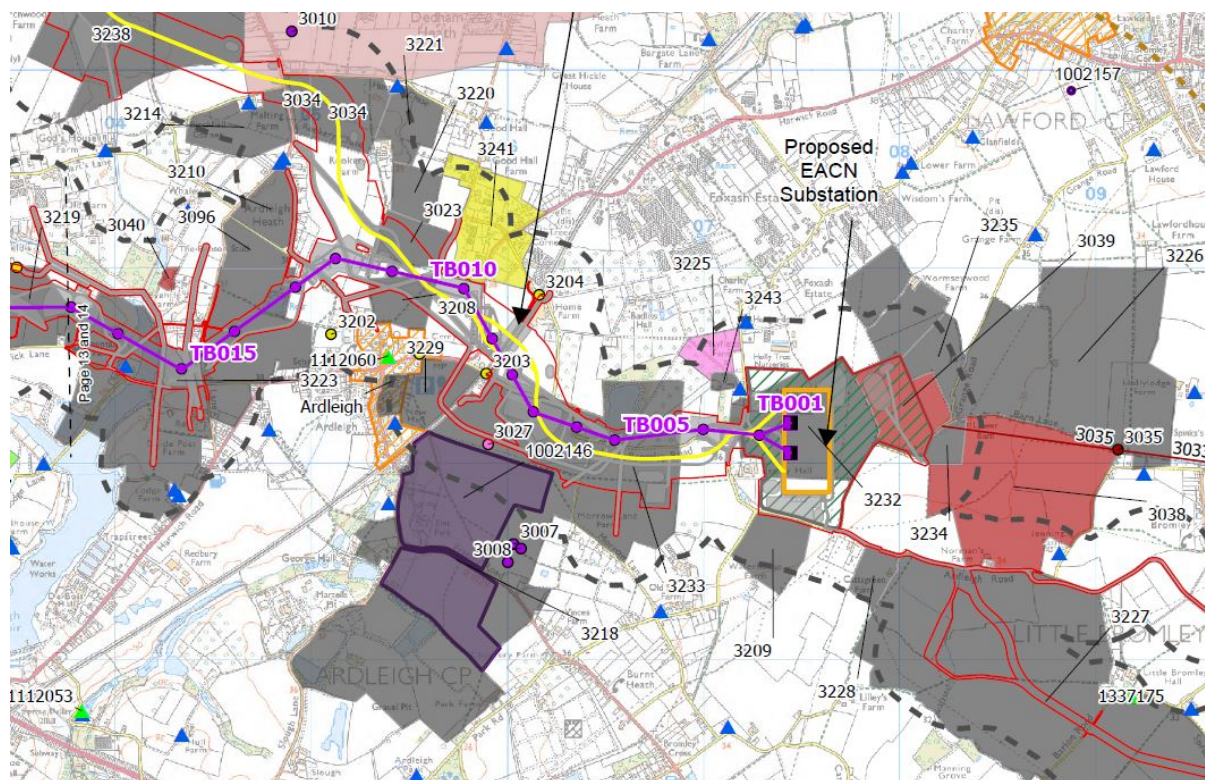
well as the landscape as a whole, and would also allow a greater degree of flexibility in routing the cables around key archaeological sites.

Appendix 1: Fordham



Appendix 2: Ardleigh

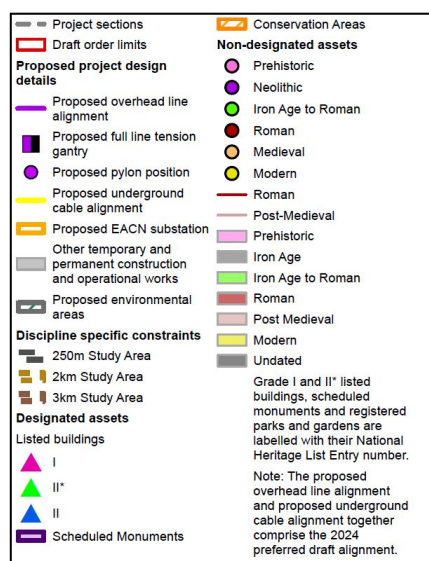
Original image from: NGET 2024 Norwich to Tilbury Statutory Consultation document Preliminary Environmental Information Report, Volume III – Technical Appendices – 3 of 4 April 2024



NGET Figure A11.1: Historic Environment Designated and Non-Designated Heritage Assets Page 13 of 25: Drawing No. 10059280-ARC-ELS-ZZ-DR-ZZ-00188 Rev. A

It should be noted that there are 17 listed buildings in the Conservation Area (16 Grade II and 1 Grade II*) and therefore considerably more than shown on this plan. Similarly, the plan “Norwich to Tilbury - Environmental Constraints - Section C.pdf” shows just 2 of the 17 listed buildings in the Conservation Area (National Grid Drawing Reference: AENC-NG-ENG-PLN-0012, SHEET 11 OF 16, Issue A, Date: APRIL 2024).

NGET Key



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Deadline 7 Submission – Health and Wellbeing Impacts

Submitted on behalf of Ardleigh and Little Bromley Parish Councils

Norwich to Tilbury Project Environmental Statement EN0200027-003814

This submission addresses Environmental Statement Chapter 10 as it affects Ardleigh, Little Bromley and the East Anglia Connection Node (EACN). The Parish Councils understand the relevant document reference to be Environmental Statement Chapter 10, Health and Wellbeing (EN0200027-003814), but ask that the Applicant confirms the correct and consistent reference because it appears inconsistently formatted in the examination material. Although the ward is within the Local Study Area, the assessment is drawn at too broad a geographical scale. Ward-wide averages risk masking local effects on named receptors, roads and settlements, including homes close to the EACN, Bentley Road, Ardleigh Road, Little Bromley Road, Hungerdown Lane, local public rights of way and the settlements of Ardleigh and Little Bromley.

Key Local Health and Wellbeing Concerns

Construction traffic and rural road safety are significant local concerns. Primary Access Route 30 on Bentley Road is identified as having potential for a large negative construction traffic noise impact, with a significant effect at a residential receptor before mitigation. The causal sequence requiring examination is clear: construction traffic and associated noise on narrow rural roads would expose residents, walkers, cyclists, horse riders and other road users to changes in safety, noise and accessibility; those changes may affect health determinants such as perceived safety, sleep, stress, access to services, physical activity and social contact; and those determinants may in turn affect wellbeing and, where evidence supports it, health outcomes. Bentley Road, Ardleigh Road, Little Bromley Road, Hungerdown Lane and nearby lanes should therefore be assessed by reference to the receptors and users actually exposed, not only by reference to population-level conclusions.

Noise, vibration and operational effects require receptor-level assessment. The stronger factual foundation for this issue is the evidence on Bentley Road and operational noise, rather than a general assertion that all amenity effects are clinical health effects. Construction noise, construction traffic noise, vibration and long-term EACN operational noise may affect residential amenity, sleep, stress and wider wellbeing where receptors are sufficiently exposed. The Parish Councils therefore ask for receptor-specific assessment, clear operational noise limits, transparent monitoring and enforceable controls for affected homes and sensitive routes.

Mental wellbeing, visual amenity and sense of place are not assessed locally enough. The EACN, overhead lines, pylons, compounds, haul roads, lighting and vegetation loss would alter the rural character of the area. These effects should be

characterised carefully: some may be health determinants, but others are properly described as effects on wellbeing, residential amenity, community confidence and sense of place. The Applicant's own terminology should be used where it has identified properties or locations approaching the threshold at which living conditions would become unattractive, with the precise wording and reference supplied in the final version.

Vulnerable residents and access to services should be considered at receptor and settlement level. The Parish Councils do not need to assume that particular vulnerable individuals will be present without evidence. The point is that children, older people, disabled people, people with health conditions, people without access to a car, low-income households, pedestrians and cyclists may be more sensitive to disruption where rural communities rely on a small number of roads, services and informal support networks. If the Applicant disputes the presence or sensitivity of such receptors, that is a reason for a receptor-sensitive addendum, not for relying on ward-level averages.

Public rights of way and rural amenity support physical activity, social contact and mental wellbeing. Closures, diversions, construction traffic or perceived loss of safety may discourage walking, cycling and horse riding. The likely pathway is therefore from works and traffic disruption, to exposed recreational users and residents, to reduced perceived safety or accessibility, to potential changes in physical activity, social contact and wellbeing. The assessment should test these effects by reference to the rights of way and settlements actually affected.

EMF information, reassurance and community confidence also require attention. The Parish Councils do not allege exceedance of ICNIRP limits unless the evidence supports that case. The present concern is whether affected communities have been given adequate information, modelling, reassurance and transparent monitoring arrangements. Even where exposure is predicted to remain below relevant limits, uncertainty or inadequate explanation may affect community confidence and wellbeing.

Main Gaps Requiring Examination

The principal weakness is reliance on a ward-level approach. Ardleigh and Little Bromley are treated as one broad receptor, with insufficient settlement-level and receptor-level analysis of vulnerable groups, traffic safety, public rights of way, EACN operational noise, EMF information and cumulative effects. The cumulative issue should not be presented as a mere list of other projects. The point is that prolonged uncertainty, overlapping construction periods, repeated traffic disruption, repeated changes to rural amenity and the cumulative loss of community confidence may operate together on the same receptors and settlements.

Requested Actions for the Examining Authority

1. **Require a targeted health and wellbeing addendum** for Ardleigh and Little Bromley, addressing named receptors, roads, public rights of way and pathways from source to exposed receptor, health determinant, possible outcome and proposed control.
2. **Require receptor-level EACN operational noise assessment**, outcome-based operational noise limits and transparent monitoring for affected homes, drawing expressly on the evidence relating to Bentley Road and other named receptors.
3. **Require local traffic and safety controls** for Bentley Road, Ardleigh Road, Little Bromley Road, Hungerdown Lane, rural lanes and vulnerable road users, with controls tied to the specialist transport, noise and public rights of way evidence.
4. **Require enforceable, outcome-based mitigation and monitoring** for noise, vibration, construction traffic, access disruption, EMF information and cumulative impacts with other NSIPs, avoiding a separate generic “health mitigation” requirement where the necessary controls can be secured through the specialist topics.

Conclusion

Chapter 10 identifies relevant health determinants but does not assess them locally enough for Ardleigh, Little Bromley or communities affected by the EACN. The Parish Councils ask the Examining Authority to require a targeted addendum addressing named receptors and pathways, together with outcome-based controls and monitoring drawn from the specialist topics, before health and wellbeing impacts are accepted as adequately assessed and controlled.

Deadline 7 Submission: Environmental Statement

Norwich to Tilbury Project – Environmental Statement EN020027-003941 and EN020027-003942

Submitted on behalf of Ardleigh Parish Council and Little Bromley Parish Council

Ardleigh Parish Council and Little Bromley Parish Council submit this joint summary to highlight continuing concerns about the proposed East Anglia Connection Node (EACN), including its siting, access arrangements, heritage implications and cumulative impact. The Councils consider that the Applicant's assessment does not yet distinguish with sufficient clarity between the existence of archaeological remains, their heritage significance, the anticipated magnitude of impact upon them and the resulting assessed effect. The Councils' concern is not that the mere presence of remains automatically produces a significant effect, but that the Environmental Statement should explain, with local specificity, why the assessed effects are said to be acceptable and how residual risk will be controlled.

Purpose and Overall Position

The Environmental Statement confirms that the EACN and associated works sit within a sensitive historic environment, not a blank agricultural landscape. The impacts extend beyond the substation footprint to underground cable works, pylons, haul roads, compounds, attenuation and drainage works, access and bellmouth works, highway mitigation and rural lanes. The Councils submit that these combined effects require a clearer, asset-by-asset explanation of the baseline relied upon, the significance attributed to identified remains and historic landscape features, the magnitude of impact from each relevant work activity and the consequential effect after mitigation.

Key Concerns

1. Heritage sensitivity and confirmed archaeology

Ardleigh is identified as part of an important multi-period archaeological landscape. The Scheduled Monument referred to in the Environmental Statement should be checked against the official list entry, including its correct name and list-entry number, as the current formatting appears uncertain. The Councils understand the relevant cropmark complex south of Ardleigh to include Bronze Age funerary activity, Iron Age settlement evidence and extensive Romano-British occupation. Chapter 11 also identifies Site 01 as covering the new EACN Substation and associated works east of Ardleigh and north of Little Bromley Road. The Environmental Statement should give the precise Chapter 11 paragraphs, gazetteer entries, trench references and figure references for the archaeological evidence relied upon. Trial trenching is said to have revealed four phases of activity, including Bronze Age, Iron Age, medieval and post-medieval features. That evidence demonstrates the existence of remains and requires a clear explanation of

their significance, but it should not be treated as a substitute for the separate assessment of magnitude of impact and resulting effect.

2. Cropmarks, possible Roman road evidence and wider historic landscape

The EACN geophysical survey identified former field boundaries, possible enclosures, trackways and a geophysical interpretation of possible Roman road evidence. Unless and until confirmed by excavation, that evidence should be described as an interpretation rather than as established Roman road remains. The priority survey corridor from the River Stour valley to the EACN extends for more than 10 km and includes cabling, pylons, compounds, SuDS basins, crossings, attenuation and temporary haul roads. The cropmark complex south-south-east of Ardleigh and south of Little Bromley Road should therefore be assessed as part of a wider historic landscape. The Environmental Statement should make clear which works threaten which features, including substation foundations, cable trenching, drainage, access works, compounds, landscaping and temporary construction activity.

3. Little Bromley access, protected lanes and rural character

Little Bromley Parish Council remains concerned that the EACN access strategy places disproportionate construction and operational burden on narrow rural lanes. The Environmental Statement identifies protected lanes of medieval date within Section C, but the Councils ask that each relevant lane be identified by status, location and relationship to the proposed access works. The heritage harm relied upon should also be explained with precision: for example, whether it arises from widening, bellmouth construction, traffic intensity, HGV movements, permanent access alterations, loss of historic alignment, erosion of rural character or cumulative change in the setting of the lanes. For Ardleigh and Little Bromley, these lanes are part of the historic rural landscape and should not be treated simply as construction routes.

4. Little Bromley War Memorial vibration risk

Chapter 11 identifies Little Bromley War Memorial as the historic structure with potential for damage from construction vibration. The Councils maintain their concern that this sensitive community heritage asset should be protected by enforceable pre-construction condition surveys, vibration limits, monitoring requirements, halt-work procedures and repair obligations. The detailed vibration controls are addressed in the Councils' noise paper and are not repeated here.

The Councils' criticisms should be understood as distinct. The Examining Authority is asked to require the Applicant to clarify whether it says the baseline is complete, whether the significance of identified remains and historic landscape features has been correctly characterised, whether the magnitude of impact from the EACN and associated works has been properly assessed and whether the proposed mitigation is

sufficient. Those questions should not be elided: an adequate baseline does not necessarily answer significance; an acknowledged impact does not necessarily establish its magnitude; and a proposed mitigation strategy does not itself demonstrate that the residual effect is acceptable.

5. Cumulative infrastructure burden and alternatives

Ardleigh and Little Bromley are now facing a growing concentration of energy infrastructure, including the EACN, Five Estuaries substation, North Falls substation, Tarchon interconnector, the existing Little Bromley substation and an approved battery storage facility. The Councils submit that cumulative effects on heritage, landscape character, tranquillity, rural identity and community cohesion have been materially underestimated. The Applicant has not provided a sufficiently transparent comparative appraisal of reasonable alternatives to the EACN location, design and access arrangements, including opportunities to reduce, relocate or consolidate impacts.

Requested Examining Authority Actions

1. **Require a full and transparent alternatives appraisal** for the EACN siting, layout, access strategy, construction compounds and phasing, including clear evidence of why less harmful options were rejected.
2. **Require an enhanced heritage assessment for Section C**, explicitly addressing the Ardleigh archaeological complex, the wider prehistoric and Romano-British landscape, cropmark evidence, the geophysical interpretation of possible Roman road evidence, protected lanes and the distinction between baseline, significance, magnitude of impact and resulting effect.
3. **Require concrete archaeological controls before irreversible works**, including an agreed written scheme of investigation, evaluation before irreversible works, archaeological presence during specified works, stop-work and notification procedures, authority for the relevant approving body to require further investigation, publication and archiving obligations and clear treatment of unexpected remains. The role of local archaeological advisers should be defined as approval and consultation input through those controls, rather than by reference to undefined “effective control”.
4. **Require a formal cumulative infrastructure assessment** covering existing, consented and proposed energy projects affecting Ardleigh and Little Bromley, including the EACN, Five Estuaries, North Falls, Tarchon, the existing Little Bromley substation and the approved battery storage facility.
5. **Require enforceable traffic, lane protection and community safeguards**, including rural lane protection, construction phasing, HGV management, protected-lane controls, and cross-referenced vibration controls for Little Bromley War Memorial as set out in the Councils’ noise paper, together with ongoing community engagement.

Deadline 7 Submission: Design Approach for Site Specific Infrastructure

Submitted on behalf of Ardleigh Parish Council and Little Bromley Parish Council

Norwich to Tilbury Design Approach for Site Specific Infrastructure EN020027-003981

Ardleigh Parish Council (APC) and Little Bromley Parish Council (LBPC) submit this joint Deadline 7 representation in response to the Applicant's *Design Approach for Site Specific Infrastructure (DASSI), Revision D*. The DASSI usefully establishes the scale and permanence of the proposed **East Anglia Connection Node (EACN)** near Ardleigh, including a new 400 kV AIS substation, permanent access arrangements and mitigation. However, the Parish Councils consider that the site-specific design approach remains insufficiently justified, inadequately controlled and insufficiently responsive to the cumulative effects already identified for the Ardleigh–Little Bromley Area (ALBA).

The principal concern is the **cumulative burden** placed on ALBA by multiple energy projects, cable corridors, construction compounds and access routes. That criticism is directed to the overall application as well as to the DASSI. In relation to this paper, the concern is that the DASSI does not demonstrate how those established cumulative effects have influenced the site-specific design, siting, access, lighting, landscape and mitigation proposals for the EACN.

Key Concerns

1.1 Scale and siting of the EACN

The EACN would be a major new **400 kV AIS substation** near Ardleigh, adjacent to Lawford 132 kV substation. The Applicant should verify whether the stated **550 m × 230 m** extent represents the operational footprint, the maximum parameters, an indicative layout or another boundary. The Parish Councils are also concerned that the base height of proposed structures and any permitted upward limit of deviation should be stated separately. It is insufficient simply to describe structures as being “up to 15 m” if additional vertical deviation may still be authorised. On the worst-case basis, the siting and parameters would make Ardleigh a major inland energy hub for Tarchon Interconnector, North Falls and Five Estuaries. The Parish Councils consider this siting disproportionate and insufficiently justified.

1.2 Permanent access road and traffic impacts

The proposed permanent access road between Bentley Road and Ardleigh Road would cut across agricultural land and introduce a major transport intervention into Ardleigh. The Parish Councils' concern is not only traffic volume. The DASSI should explain the engineering and environmental consequences of the access proposal, including road

width, junction treatment, severance of agricultural land, effects on farm operations, lighting, drainage, operational use and the relationship with Abnormal Indivisible Load movements. Its use for abnormal loads and operational access has not been justified against reasonable alternatives, strategic road options or a coordinated approach that avoids rural lanes.

1.3 Cumulative effects on ALBA

The DASSI is not the proper document in which to provide the whole cumulative assessment for ALBA. However, its design approach should demonstrate how the established cumulative effects of the EACN, cable corridors, CSE compounds, construction traffic, offshore wind connections and the Tarchon Interconnector have informed the site-specific design. It does not do so. That is a major deficiency because communities experience these projects collectively, not in isolation, and because a design document should show how cumulative impacts have translated into practical design constraints and mitigation.

1.4 Landscape, lighting and rural character

The substation, fencing, lighting and access infrastructure would significantly alter the rural landscape. The DASSI provisions addressing lighting, fencing, planting, external finishes and detailed design should be identified and tested against specific outcomes. At present, the proposed mitigation, including the Environmental Area, habitat management and planting, remains too generic. The Parish Councils seek lower maximum heights, reduced lighting with defined lux limits, directional or motion-controlled lighting, recessive external finishes, specified boundary planting dimensions, retention of existing vegetation, fixed access arrangements and coordinated landscape treatment with connecting projects. Broad limits of deviation are prejudicial where the assessed worst case is unclear and unacceptable outcomes remain authorised.

1.5 Impacts on Little Bromley

Although Little Bromley is not named directly in the DASSI, associated access and construction traffic would affect its rural road network. The village's narrow lanes, lack of footways and vulnerable residential clusters make continued use as a construction corridor unacceptable without a clear alternative strategy.

2. Requested Actions

APC and LBPC request that the Examining Authority require the Applicant to:

1. Maintain, by cross-reference to the Parish Councils' earlier alternatives case, the objection that offshore solutions, coastal connection points and alternative onshore sites have not been properly assessed, while focusing this DASSI response on the site-

specific design, access, lighting, landscape and mitigation controls required if the EACN is pursued.

2. Explain how the established cumulative effects on ALBA have influenced the site-specific design of the EACN, including structure heights, lighting, fencing, planting, external finishes, access arrangements, drainage and the coordination of landscape treatment with connecting projects.

3. Name APC and LBPC as consultees on all relevant detailed design, landscaping, lighting and access submissions, and secure minimum landscape and community-mitigation outcomes including funding, implementation dates, a maintenance period, replacement obligations and monitoring.

4. Secure practical design controls requiring lower maximum heights, reduced and directional lighting, defined lux limits, recessive finishes, retention of existing vegetation, fixed access arrangements and enforceable boundary planting dimensions before the relevant works commence.

4. Conclusion

The DASSI confirms the scale, permanence and intensity of the EACN and associated infrastructure, but does not adequately justify the site-specific design, access strategy, limits of deviation or mitigation controls. The wider alternatives objection remains as set out in the Parish Councils' earlier case, but this paper concentrates on the practical controls needed to ensure that the detailed design, lighting, landscaping and access arrangements do not authorise unacceptable outcomes for Ardleigh, Little Bromley and the surrounding rural area.

APC and LBPC therefore ask the Examining Authority to require the Applicant to revisit the DASSI, identify the relevant design, lighting, fencing, planting, finishes and access provisions, and explain how cumulative effects have materially shaped the site-specific design. The Parish Councils also ask that APC and LBPC be named consultees on the relevant detailed submissions and that enforceable minimum outcomes be secured for lighting, access, landscape implementation, maintenance, replacement planting and monitoring.

Deadline7 Submission – Community Engagement and Public Information

Submitted on behalf of Ardleigh and Little Bromley Parish Council

Norwich to Tilbury Project: Community Engagement and Public Information EN020027-003833

Ardleigh and Little Bromley Parish Council recognises the strategic need for the Norwich–Tilbury reinforcement project. However, its primary position remains that the siting of the East Anglia Connection Node (EACN) at Ardleigh and Little Bromley has not been adequately justified. Communication measures cannot cure an inadequately justified siting decision or substitute for avoidance and reduction of harm. Without prejudice to the Councils' case on siting, effective parish-specific communication must be secured if consent is granted.

The mitigation hierarchy requires avoidance and reduction of harm to be considered at an early stage. Alternatives and mitigation are not, however, rigid sequential stages in every case. The point for present purposes is that communication and complaints arrangements must not be treated as a substitute for a properly reasoned siting decision. If the EACN remains proposed at Ardleigh and Little Bromley, Appendix E must be strengthened so that engagement, reporting and escalation arrangements are specific to the parishes most directly affected by the project's largest single construction element.

The Applicant's Case (as presented in Appendix E)

Appendix E proposes route-wide engagement measures, including a community relations team, project website, hotline, email and freepost address, site boards, land and property engagement, accessible communications, a complaints process and general information about electromagnetic fields (EMF). Those provisions are too generic for Ardleigh and Little Bromley. In particular, Appendix E does not identify a parish-level liaison route for the EACN; does not require phase-specific briefings tied to the intensity of construction activity; does not require immediate notification of serious incidents, route breaches, unplanned out-of-hours working or material exceedances; does not provide parish-level publication of anonymised complaints and compliance information; and does not secure accessible site-specific EMF information and commissioning results for the affected community.

The Councils' Concerns

The EACN would involve multi-year heavy works, high HGV volumes, noise, dust, vibration, lighting, land take, landscape change and highways coordination. Ardleigh and Little Bromley therefore require engagement proportionate to that impact. The

arrangements should include a named liaison officer; briefings at a frequency linked to the relevant construction phase, with more frequent briefings during peak EACN activity and reduced frequency when works are limited; weekly forward-look bulletins during active construction; immediate incident notifications; joint traffic communications with Essex County Council; and clear routes for escalation where commitments are not being met.

Complaints and Electromagnetic Fields information

The complaints process must distinguish between acknowledgement, investigation, interim response, resolution and escalation. A 48–72 hour final resolution will not be realistic for every complaint, particularly where technical investigation or third-party input is required. However, acknowledgement and initial action within 48–72 hours is both realistic and necessary for construction-intensive parishes. Appendix E should therefore require prompt acknowledgement, identification of the investigation route, an interim response where resolution is not possible within the initial period, a clear target for final resolution, and escalation to a senior project contact where complaints are repeated, unresolved or concern serious impacts.

The Councils also request parish-level publication of complaints and compliance information in anonymised form. That publication should identify complaint categories, response times, outcomes, repeat issues, route breaches, material exceedances and any corrective action taken. The Applicant should also be required to notify the Councils immediately of serious incidents, HGV route breaches, unplanned out-of-hours working and material exceedances of agreed controls or limits.

EMF should be addressed carefully. The Councils do not suggest that compliance with applicable exposure standards is irrelevant, nor do they seek to imply an unproven health effect. The concern is that understandable public anxiety requires clear, accessible and site-specific information. Appendix E should therefore commit to EACN-specific EMF information, public explanation of the applicable exposure standards, and publication of relevant commissioning results in a form capable of being understood by residents.

Policy, Alternatives and Mitigation

NPS EN-1 and EN-5 require community impacts to be minimised, information to be clear and accessible, engagement to be effective, and alternatives to be properly considered. For Ardleigh and Little Bromley, the alternatives assessment remains central to the Councils' case. The Applicant should not rely on communication or construction mitigation as if those measures could themselves justify the Ardleigh and Little Bromley siting. The proper question is whether less harmful options have been fairly assessed, and whether any residual harm at Ardleigh and Little Bromley is then reduced, managed and reported transparently.

The Councils maintain that the Applicant must demonstrate that it has properly assessed alternatives capable of avoiding or reducing harm, including locations closer to existing substations, areas with lower residential density, coastal or offshore connection points, and sites with better road access and lower landscape sensitivity. Those options may materially reduce landscape and visual harm, traffic pressure, cumulative infrastructure effects and community disruption. The assessment must be transparent and comparative, not replaced by general assurances about communication or construction management.

If consent is granted with the EACN at Ardleigh and Little Bromley, the relevant mitigation and engagement arrangements must be secured in an identified management plan or DCO commitment. They should not be left as narrative assurances in Appendix E. The secured commitments should include parish-specific engagement, the complaints stages identified above, phase-specific briefings, weekly construction updates during active works, Essex County Council highways coordination, immediate notification of serious incidents and material exceedances, accessible site-specific EMF information, publication of commissioning results, and transparent reporting of compliance and incidents.

Conclusion

Ardleigh and Little Bromley Parish Council's primary position is that the siting of the EACN at Ardleigh and Little Bromley has not been adequately justified and that less harmful alternatives must be transparently assessed. Communication measures cannot cure that deficiency. If, however, consent is granted, the Applicant must be required to secure parish-specific engagement, complaints, incident-notification, compliance-reporting and EMF-information commitments that reflect the scale and duration of the impacts on Ardleigh and Little Bromley.

The Councils therefore request that the Examining Authority require Appendix E, or another identified certified document or DCO commitment, to be amended so that these obligations are expressly secured, enforceable and tailored to the parishes most directly affected by the EACN.