

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.