

Response to the Applicant's deadline 5 submissions relating to visualisations

Revision: 1

Date: 6 July 2026

Table of Contents

1. Requests for further visualisations	2
Procedural history.....	2
ALBA response	2
2. 3D visualisation tool	5
3. Limit of Deviation visualisations.....	6
4. Conclusions.....	8

1. Requests for further visualisations

Procedural history

Action Point 32 from Issue Specific Hearing 2 [EV9-023] states the following:

“Ardleigh and Little Bromley Parish Councils (ALBA) to provide a list of suggested additional viewpoints. Applicant to provide further visuals as necessary at deadline 5 (Wednesday 10 June).”

ALBA responded to this Action Point at deadline 4 (12 May 2026), by providing a list of visualisation requests in document “EN020027-002710-Ardleigh Parish Council and Little Bromley Parish Council” [REP4-319].

The Applicant responded at deadline 5 to ALBA’s submission with comments under the heading “3.13 ISH2 Action Point 32” in document “EN020027-003567-8.4.12 Applicants Comments on Post-Hearing Submission...” [REP5-194].

ALBA response

ALBA would like to highlight the following points in relation to the Applicant’s [REP5-194] submission:

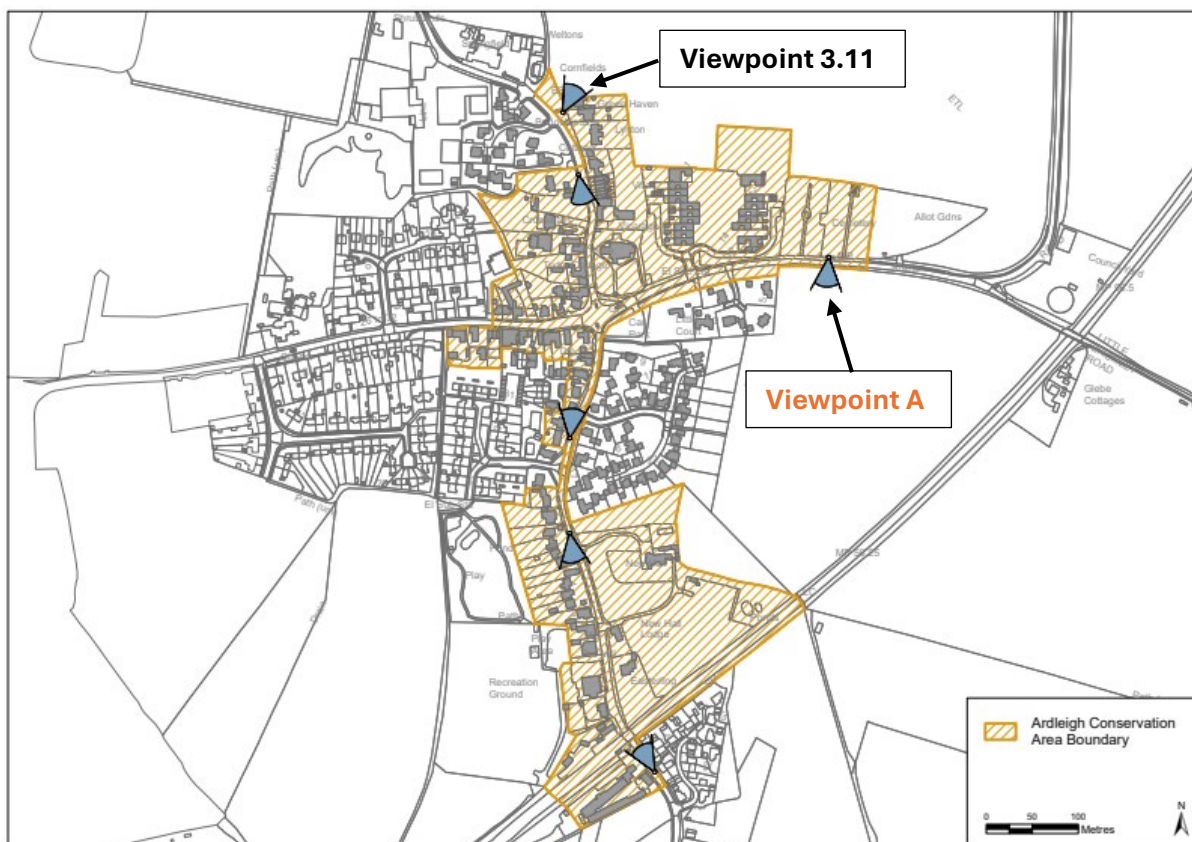
- The following statement is very concerning: *“The conclusions of the Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] or the Historic Environment assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] will not change as a result of adding new illustrated viewpoints”*.
- These are viewpoints that the Applicant has not previously assessed, despite earlier requests from ALBA. It is therefore premature to state that the assessments would not change.
- Five of these requests date back to the 2024 statutory consultation – please refer to [REP4-319] for details.
- Of the 11 viewpoints requested by ALBA, the Applicant has stated that it will only be producing visualisations for 2 of these (Bounds Farm, Hungerdown Lane and at the intersection between PRoW Ardleigh 5 and PRoW Ardleigh 7/Green Lane).
- In addition, the Applicant has committed to producing the new visualisations for deadline 6 instead of deadline 5 as requested by the ExA.
- The Applicant acknowledges *“the effect on visual receptors would be major and significant”* for 5 of the 9 viewpoints that were dismissed. ALBA considers this level of harm to be sufficient justification alone for including viewpoints relating to these visual receptors.
- ALBA strongly disagrees with the following statement, which the Applicant has attached to two of the requested viewpoints: *“It was agreed with heritage stakeholders 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 setting does provide a significant contribution to its value, as ALBA has outlined in previous submissions.

- In relation to requested *"Viewpoint A - From the South of the A137 Ardleigh Conservation Area (CA26)"* the Applicant states: *"The location as shown on the image is not one of the key views identified on Figure 43, page 38 of Ardleigh Conservation Area Character Appraisal and Management Plan (Place Services 2025). It is close to VP 3.11 which is informed by one of the identified key views in the conservation area appraisal and has informed the assessment of the conservation area"*.
- Both statements are incorrect, as outlined below:
 - (i) Viewpoint A does in fact coincide with one of the key views identified on Figure 43, page 38 of Ardleigh Conservation Area Character Appraisal and Management Plan. The map showing the location of Viewpoint A was provided in section 1.2. of "Appendix A: Viewpoint Maps and Images" in [REP4-319]. The corresponding map from the Ardleigh Conservation Area Character Appraisal and Management Plan¹ was included on page 14 of the [REP4-319] main document.
 - (ii) The location, orientation and views from Viewpoint A are very different to VP 3.11. and therefore warrant an additional visualisation.
- To help clarify the matter, an annotated copy of the *"Map showing key views within the Conservation Area"* from the Ardleigh Conservation Area Character Appraisal and Management Plan is included in this document. Labels have been added to show the viewpoint that is close to the Applicant's "VP 3.11" and the viewpoint that is close to ALBA's "Viewpoint A".
- "Viewpoint A" represents one of the key views in the Ardleigh Conservation Area Character Appraisal and Management Plan. As it is also one of only two key external views identified in the conservation area plan and, as there would be extensive visibility of the proposed development from this viewpoint, the views from here should have been considered in the assessment of harm to the Ardleigh Conservation Area. The Applicant only refers to the other external view, which is the one close to Applicant's VP 3.11.
- Ardleigh PC highlighted the significance of the view from this second viewpoint (now known as "Viewpoint A") in the Historic Environment report submitted for

the Norwich to Tilbury Statutory Consultation in July 2024², but, as illustrated here, this was not accepted by the Applicant.

- The Applicant refers to the vegetation removal plans as an alternative to the declined visualisation request for Bentley Road (PAR30), Little Bromley. ALBA does not consider that the 2D plans adequately convey the impact of the proposed vegetation removal.
- Two of the declined viewpoint requests relate to the route alignment changes introduced during the 2025 Targeted Consultation. As no visualisations relating to this change were supplied at the time of the consultation, or in response to requests made when the changes were confirmed, it remains to be the case that no visualisations in any form have been supplied to reflect these changes. Please refer to [REP4-319] for further details of the previous requests.
- Additionally, the Applicant has not addressed points raised by ALBA in [REP4-319] in relation to the quality of the existing visualisations, such as the Grade II* St Mary's Church, Ardleigh (1112060) being obscured by a tree in the image from Viewpoint 3.31.



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

2. 3D visualisation tool

In response to the ALBA document on visualisations [REP4-319], in LV 2.19 of Examining Authority's Written Questions 2 (ExQ2) [PD-023] the following was requested of the Applicant by deadline 5 (10 June 2026):

“3D Visualisation Tool

At deadline 4, both Villages Against Pylons [REP4-380], and Ardleigh and Little Bromley Parish Councils [REP4-319] provided photographs taken from a public consultation event. These appear to have been taken from a 3D Visualisation Tool. The ExA acknowledge the response you provided to Ardleigh and Little Bromley Parish Council in Appendix B of [REP4-319] and appreciate that these images may not have been worked up into industry-standard visualisations. However, the photographs submitted cover areas that have not been extensively covered by visualisations and, in the absence of formal visualisations, would therefore be of use to the examination. The applicant is asked to provide screenshots from the 3D visualisation tool from the locations identified in these two submissions.”

In response the Applicant supplied screenshots from the 3D visualisation tool in Appendix H of “8.9.2 Applicant's Response to Second Written Questions” [REP5-211].

The new images were naturally of higher quality than the photographs taken of a computer screen by residents during the 2024 statutory consultation.

However, it would have been helpful if the Applicant had also supplied images from the 3D visualisation tool for the locations where it has refused to grant requests for photomontage visualisations, and if the model had been updated to reflect the changes relating to the 2025 targeted consultation.

The Applicant provided Limit of Deviation (LoD) Visualisations for Viewpoint HE25 in Ardleigh in response to ISH2 Action Point 25. The relevant document is “8.4.12.1 *Response to ISH2 Action Point 25 - LoD visualisations - Part 3*” [REP5-197]. The visualisations for this viewpoint are on pages 43 to 49 (out of 49) of the electronic version.

Photomontage – Limit of Deviation

OS reference	600200 234026	Horizontal foot of slope	601° (approximate gradient)	Camera	Canon EOS 60 Mark II	Photography Date	05/03/2020
Direction of view	234°	North	601°	Camera height	1.5 m	Photography Time	08:34
Distance of view	1.5 km	Peak level	601° ± 500' (roof A1)				
Weather/ground		Offshore (offshore wind)	601° ± 500' (roof A1)				

View flat at a comfortable arm's length

Figure 7.12.23.24. HESJ01 Viewpoint WEST, Arnhem



Noting that this viewpoint, HE25, is in the village centre, ALBA considers that the Applicant should re-assess the impact of the proposed infrastructure on the village. This includes re-assessment of the many heritage assets located in the centre, noting that the Applicant scoped most of these out of the assessment. As outlined in previous submissions, the Applicant's drawing "Figure 11.2- Historic Environment - Designated Heritage Assets Assessed in the ES Chapter (now at Revision C)" [REP4-145] only shows one listed building in the Ardleigh Conservation Area, which is the Grade II* St

Mary's Church, Ardleigh (1112060). There are 17 listed buildings in the conservation area and many important non-designated heritage assets. There is therefore a high aggregative value. An overview of the impact on the historic environment is provided in previous submission "*Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh*" [AS-065].

As has been raised previously, considering the rich heritage of the village, it is not considered sufficient for ALBA to only have one Historic Environment viewpoint.

4. Conclusions

The Applicant's response to the requests for additional viewpoints is very disappointing, particularly considering the very high degree of harm the proposal would cause to ALBA.

Issues with the previous visualisations are outlined in ALBA submission [REP4-319].

The response does not address the needs and concerns of the community. Many residents are still not aware of the full impact. It also deprives the Examination of important information when there is only 5 weeks remaining until the end of the 6-month process.

As has been the case throughout, the Applicant has not properly considered the knowledge of those who live in the community. Detailed information has been supplied by ALBA at all stages of the process from people who know and understand the area and would have to live with proposals.

The Applicant uses the word "*proportionate*" to justify its decision making in relation to the requests for additional visualisations. Proportionality should apply to the specific situation and the harm caused. The route of the proposed infrastructure in ALBA is particularly complex and hard to visualise. There is also no doubt that the impact on ALBA of the Norwich to Tilbury project and the associated proposals would be profound.

The images from the 3D visualisation tool demonstrate a much higher level of harm than is apparent from the photomontages supplied by the Applicant. These images represent a subset of those listed in ALBA's visualisation requests.

In light of the Applicant's decision to not supply photomontages for these viewpoints, the ExA is respectfully referred to the images from the 3D visualisation tool in Applicant's document [REP5-211]³ 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]⁴ (the main report and the Appendices).

As several important viewpoints have never been assessed, the Applicant's landscape and heritage conclusions need to be treated with appropriate caution.

³ EN020027-003552-8.9.2 Applicant's Response to Second Written Questions

⁴ EN020027-002710-Ardleigh Parish Council and Little Bromley Parish Council

