

Ardleigh Parish Council
Response to National Grid Targeted Consultation
Location references: Essex 2 and Essex 4
March 2025

Introduction

We remain opposed to the scheme. We would draw attention to and reiterate the previous responses which give details of the harms faced by Ardleigh should the proposals go ahead. We do not propose to repeat these here.

Our specific concerns, expanded below, include that:

- Ardleigh remains the wrong choice for the East Anglia Connection Node (EACN) and we do not believe that the site selection process was adequate.
- the Targeted Consultation is inadequate and flawed, both regarding the gaps in communication with affected residents and the short time in which to pull together the responses.
- Some of the proposed changes are even worse than those proposed in the statutory consultation and meaningful mitigation remains impossible.

There are a range of major projects proposed which would have devastating cumulative impact on the area and there is clear interdependence between the different projects:

- Norwich to Tilbury
- Five Estuaries windfarm substation and cabling
- North Falls windfarm substation and cabling
- Tarchon converter station and cabling
- Mineral extraction

We estimate that at least 260 hectares of the Parish and immediate surrounding area could be at risk. Ardleigh is defined in the Census as a rural parish. It has an area of 2040 hectares, of which only approximately 5% is currently built upon. Further, there is in the region of 100 hectares of surface water, including Ardleigh Reservoir and Salary Brook, as well as several fishing lakes and irrigation ponds. A further 50 hectares is protected as green space, Scheduled Monument and Site of Special Scientific Interest. We estimate that land take for the pylon and underground cable swathe, National Grid EACN, Five Estuaries and North Falls substations and Tarchon converter station, would be in excess of 275 hectares. **This is more than 15% of the unprotected land area of the Parish.**

Why Ardleigh?

Ardleigh is the wrong choice of location for the EACN. By seeking to place the main Norwich to Tilbury run of cables to the west of the A12 and Ardleigh, and the EACN on the Tendring peninsular, to the east of Ardleigh village, it is necessary to squeeze a huge amount of infrastructure into a location which is wholly unsuitable.

Some of the implications are outlined below:

- Connecting the Norwich to Tilbury circuit to the proposed EACN substation site necessitates a major deviation from the main alignment of the Norwich to Tilbury route. This conflicts with

established best practice and would result in a significant increase in the harm caused by the scheme.

- The proposed EACN site is on prime, flat, farmland and located in unspoilt countryside. Brownfield/industrial sites should be prioritised instead.
- Current plans for a further two substations and an interconnector station in the area would substantially amplify the impact. These substations are to serve the Five Estuaries and North Falls windfarms and the Tarchon converter station. As all three would be receiving power from offshore cables it is inappropriate for the chosen site for EACN to be situated some 20km from the coast. This is accentuated by the fact that Five Estuaries and North Falls are proposing to bring the power ashore as HVAC, requiring 12 separate onshore (power) cables which, even though the cables would be buried, is substantially more damaging than the 2 cables required for a HVDC equivalent where the power is pooled offshore.

These issues, in combination, would result in huge and unprecedented harm to the area. The Norwich to Tilbury scheme also shows complete disregard for the Holford and Holroyd rules, as outlined in our previous submissions. Such harm is unnecessary as much better solutions are available.

The constraints in Ardleigh Parish are:

- Ardleigh Reservoir, to the south-west of Ardleigh village which covers an expansive 48.5 hectares. The reservoir supplies over 14 million litres of drinking water every day to 133,000 customers in the Colchester area. It also supports various recreational activities and an abundance of wildlife: regularly monitored by Anglian Water and the RSPB
- The Ardleigh Conservation Area- medieval centre of the Village with 17 listed buildings (of 71 in the Parish)
- Close proximity to individual dwellings
- The mainline Norwich to London railway line
- A137 main road which acts as the main alternative route to A12
- A Scheduled Ancient Monument (close to the site of the proposed EACN)
- Close proximity to the Dedham Vale National Landscape (DVNL)

Individually, let alone collectively, these constraints should have ruled Ardleigh out as a proposed location for the EACN.

In addition, the topography means that pylons, substations and huge converter station cannot be screened and will be visible for miles around – including the DVNL. Multiple pylons and other infrastructure will be visible from (and surround) the historic village and from many properties.

To provide the Norwich to Tilbury connection to the EACN, the current HVAC proposals require a total of 36 cables to pass through the very narrow corridor within the “Essex 2” Targeted Location zone. This would comprise 18 HVAC underground cables and 18 HVAC overhead cables (with associated 50m towers).

The resulting concentration of cables would result in extensive harm to:

- Local communities - with impact on residents over a wide area
- Nature - such as the loss of important habits
- Heritage assets - including harm to the Ardleigh Conservation Area, a Scheduled Monument site and non-designated heritage assets of great significance
- Agriculture and horticulture - including the destruction of productive, high-quality farmland
- Businesses

All these points have been highlighted by Ardleigh Parish Council and our residents in previous responses, dating back to the early stages of the consultation process.

The very narrow corridor available for the cables, combined with the identified constraints that exist in this area, mean that any variant of the planned HVAC cabling route would also result in extensive harm. From the Corridor Preliminary Routeing and Siting Study (CPRSS) it should have been clear to the developer that the compromises needed to achieve this routing were unacceptable and the plan revised as a result.

EACN site selection

We have no confidence that there has been a thorough and meaningful site selection with evidence as to the process prior to the selection of the EACN site in Ardleigh.

National Grid has provided no clear evidence to demonstrate why any, or all the alternative routes would be unviable or not possible. It is not clear what alternative routes were considered, and to what extent or level of detail. For a decision of such magnitude, affecting the lives of residents of Ardleigh and other local parishes forever, placing massive infrastructure so close to existing settlements, the Parish Council would expect clear and detailed evidence demonstrating how each and every possible route for customer connections have been considered and precisely why each and every option have been discounted, with all the risk/reward and cost benefit analysis.

In discussion with Tendring District Council (TDC) we understand that based on the evidence provided by National Grid to TDC, it appears as though National Grid only considered two realistic alternative sites 'in the vicinity' of Colchester. The Parish Council feel National Grid did not have an open mind when considering alternative sites. There seems to be a suggestion in their June 2023 Design Development Report that they limited their search for other locations. We do not consider that alternative sites have been properly considered; the consultation and evidence provided publicly are deficient.

For example, one such site of particular interest to TDC is the former RAF Boxted site, which is further to the west of Ardleigh and immediately to the west of the A12, and a very considerable distance closer to the prevailing north-east to south-west route of the Norwich to Tilbury route. In their submission TDC highlight 5 reasons why RAF Boxted has been discounted by National Grid and have challenged each of these points. TDC conclude that National Grid rejected the RAF Boxted site citing 'on balance' arguments – therefore acknowledging that it is position taken that you can argue for and against, and that the position is balanced.

The Parish Council are not suggesting that RAF Boxted should be the preferred site, as we think there are better solutions such as coordinated undersea options, use of Brownfield sites, upgrading the existing Network, etc. Our comments are restricted to the inadequacies of the site selection process and the harms that would be caused by the currently proposed location, rather than suggesting an alternative location. However, this shows just how inadequate the selection process has been.

Additionally, the Parish Council would like to raise concerns about general safety following the recent substation fires across the country. The rural location of Ardleigh, lack of infrastructure and inability to access these sites with emergency vehicles must be considered. Fire service resources are limited in this rural area with cover provided by retained fire crews further afield in local towns. With many sites being accessed by single track roads, these locations are wholly inappropriate should an emergency situation occur.

Other concerns arising from this Targeted Consultation

A few specific points relating to the changes proposed in this Targeted Consultation are highlighted here:

Increase in land take and harm to horticultural/agricultural activities and nature

The changes proposed in this Targeted Consultation result in a disproportionate increase in the land area incorporated in the draft order limits. This is particularly noticeable to the north of Little Bromley Road, where the horticultural and agricultural land take is substantially increased. The extent is such that the owners of one farm consider that it would become completely unviable. The changes would also result in much greater destruction of the ancient hedges along Home Farm Lane and the associated wildlife habitats.

Pylon Alignment

It is not for the Parish Council to have a preference in the detailed siting of individual pylons, as what might be better for some parishioners could be worse for others. It is noted though that the repositioning of TB5 and TB6 to the south of Little Bromley Road, enlarges the arc in this section of the proposed pylon route around the village. This, together with the associated change where TB6 would become an additional angle tower, will increase the visual impact of the proposed tall infrastructure. The change is highlighted here purely to emphasise the earlier point about the route corridor. The lack of available latitude within the chosen corridor means that there is great sensitivity to any changes and, as illustrated here, this can increase the harm resulting from the scheme even further.

Historic Environment

The harm that the current proposed scheme would cause to heritage assets is discussed in detail in our report: Historic Environment. This was written as part of the Ardleigh Parish Council Response to National Grid Norwich to Tilbury Statutory Consultation (dated July 2024).

None of the points raised in this report have been addressed in this Targeted Consultation.

The setting of the Scheduled Monument site would still be severely harmed by nearby pylons and EACN substation. One pylon, TB6, is in fact moved even closer to the Scheduled Monument site in this proposed change, which confirms the total disregard for our submissions.

Similarly, the construction activities planned for the area immediately north of the Scheduled Monument site will cause huge harm to the very significant non-designated assets that are known to be located here. Further details relating to these non-designated assets and the Scheduled Monument are provided in the referenced Historic Environment report.

The Historic Environment report for example states that as there are heritage assets in this 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*”. It can therefore be concluded that any development of the site would be in breach of the Overarching National Policy Statement for energy (EN-1).

The document “Environmental Implications of Change – Essex 2” issued as part of this Targeted Consultation states the following under the Historic Environment heading: “*The proposed change*

would move the overhead line alignment closer to the Scheduled Monument ‘crop mark site S of Ardleigh’ and the underground cable alignment further to the north away from the Scheduled Monument. Geophysical survey undertaken in this area has not indicated any significant archaeology within the proposed Order Limits. Therefore, there would be no change to the type or significance of historic environment effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation”.

It is wrong reach this conclusion based entirely on the results of a geophysical survey. This does not consider the information we have previously supplied NG relating to the archaeology in this area. It also doesn’t consider the limitations of geophysical surveys. These shortcomings are in fact illustrated in the Project Summary of the “EACN Substation Geophysical Survey Report” issued in 2024. For the proposed EACN site it refers to: “...the findings of a review of historic environment data, which revealed a plethora of cropmarks, indicative of prehistoric and Roman activity in the surrounding landscape but also within the GSA. Those cropmark features within the GSA include a Roman road, and several rectilinear and linear features.” However, the Project Summary highlights that “No anomalies of probable archaeological interest are identified” and it goes on to say “It is considered that the most likely reason for the apparent inability of the survey to detect these cropmark features...is due to a lack of magnetic contrast between the fill of the features and the surrounding soils, the homogeneous sandy nature of the soils possibly accounting for the apparent lack of visibility.” As the proposed EACN site is so close, this is a very pertinent demonstration of the limitations of geophysical survey.

It is also noted that whilst archaeological investigations could be undertaken after consent has been granted, the NPPF is very clear in stating in paragraph 211 “...the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted”.

Consultation Flaws

National Grid’s Consultation Feedback Report April 2024 states that:

We want to ensure that members of the public and all stakeholders are engaged at each iterative stage in the development of the draft proposals and that everyone has the opportunity to comment on the draft proposals at key decision-making points.

Ardleigh Parish Council strongly refutes this statement, in relation to the Targeted Consultation for Essex 2 and 4 (as they fall within the Parish boundary), for reasons highlighted within the Parish Council’s response. Described as “Targeted Consultation” for this round has shamefully failed to reach even those directly affected, not to mention the wider community, who will all suffer the consequences.

Reference: NG Consultation Feedback Report 2024: 4.13.55 Indicates the Parish Council’s on-going disappointment that public consultation is woefully lacking.

We consider that the Community Consultation Zone is far too narrow for both Essex 2 and Essex 4 (see Targeted Non-Statutory Consultation Strategy, February 2025). In many cases contact with affected residents appears to have been non-existent or by email only. This is not sufficient, particularly noting the significance to the community.

We object to the very limited time allowed to respond – the changes are significant. There are current overwhelming pressures on Ardleigh Parish Council responding to associated infrastructure (5E, NF, Tarchon) as well as dealing with regular Parish Council business.

A key concern regarding the Targeted Consultation is that the changes do not appear to reflect meaningful consideration of the previous statutory consultation. We are unable to check this, as those

responses and how NG dealt with, and considered the Summer 2024 consultation, have not been published. This is despite those responses apparently informing some of the changes in this current consultation.

We feel that we have not been listened to. As already stated there has been no engagement with our Parish Council despite requests (e.g. invitation in Historic Environment report).

In addition, we are not confident that residents and business directly affected by the changes have been contacted by National Grid or its agents.

- For example, for Draft Order Limits Essex 2: Residents of Badliss Hall Cottages, Badliss Hall Lane - No's 1 and 2 tell us that they have received communication from National Grid and Fisher German but No's 3 and 4 have not. As these properties are next door to one another and very close to the proposed change for Essex 2, it reflects poor and inadequate consultation on NG's part. Every property and person in this small community will be seriously adversely affected by the closeness of the draft order limit and cable swathe. We are informed by owners of Bounds Farm that the Draft Order Limits now lie alongside their entire property boundary and the centre line of the swathe is less than 25m from their boundary. They have not received notification of the Targeted Consultation.
- Skylark, a farm shop and social events business, based at Prettyfields Vineyard, off Wick Lane was flagged in our response to the Statutory Consultation as not contacted. They tell us that they have not been contacted this time either.
- Other residents of Wick Lane tell us that they have had no contact regarding the Targeted Consultation. Residents of Fairhaven, Wick Lane, tell us that they have not had any correspondence from National Grid regarding this change, even though the new haul road route is much nearer than it was before.
- The Parish Council itself received a posted 'Consultation notice under Sections 42, 44 and 47 of the Planning Act...' for the targeted Tilbury Consultation which opened on 18 March, but NOT for the Essex consultation affecting our Parish.

Inadequate time to address the issues and involve the public

Given the gravity of the impact in Ardleigh, Little Bromley and surrounding areas and the cumulative impact of other projects, currently in active consultation or examination, it is extremely challenging for the Parish Council to fully engage with this consultation in the timescale provided. It was impossible, for example, to timetable a public meeting within the consultation period.

We have been given very limited time allowed to respond to these significant changes. There are significant pressures on Parish Councils in our area due to responding to associated infrastructure as well as dealing with regular Parish Council business.

For the previous National Grid consultations, we were able to arrange public meetings or information sessions for Ardleigh and Little Bromley residents to inform them about the proposals and to encourage individual engagement. It should not be up to the Parish Council to do this or to take other steps to ensure that residents are aware of the proposals. We have previously done so, but the shortness of time and the other pressures on our small team of part time staff and Councillors meant that it was not realistic on this occasion.

Problems with the previous consultations

Other companies who are linking into the EACN have all managed to meet face-to-face with the Parish Council and/or to arrange consultation events at Ardleigh Village Hall. National Grid have failed to do this.

We do not consider that there has been any genuine attempt to engage with us and our residents. Despite repeated invitations and references in previous responses there has not been a consultation on N2T in Ardleigh. Why not hold a meeting in Ardleigh Village Hall knowing the environmental sensitivity of the area?

Hence, we remain aggrieved that there have been no National Grid events in Ardleigh and consider that previous responses from National Grid rely on entirely spurious explanations relating to capacity of Ardleigh Village Hall or perceived lack of parking, both of which are inaccurate.

Mitigation

Given the scale of infrastructure proposed for Ardleigh, it is challenging to identify potential meaningful mitigations, as changes may move the problem to a slightly different location or would not reduce the harms overall.

This is particularly the case when considering not only the substantial impact of the National Grid proposals, but the additional disruption and harm which would be caused by the other projects connecting to the EACN. This concern about cumulative impact has been raised with the Planning Inspectorate in relation to the projects which are already at examination stage and will need to be considered when the National Grid examination takes place.

It is notable that the changes proposed for Little Bromley Road appear to make the situation worse, not better, in respect to proximity to Scheduled Monument, damage to biodiversity, proximity to proposed silica sand minerals extraction site.

The proposed changes to Essex 2 will make those living in proximity endure very close construction noise, dust and lighting and major disruption to access to the village of Ardleigh and Little Bromley Road and Morrow Lane. The cottages on Badliss Hall Lane will be within 50 metres of the draft order limit, 150 metres of the swathe and 250 metres of the cable. The previous option was bad enough, but this has made it much worse.

The destruction of the ancient hedges on Home Farm Lane cannot be replaced; there is one particular oak tree, of over 100 years in age, that has an occupied owl nest box. This will be destroyed by the underground cable and swathe. The farm reservoir is home to many different wildfowl, bats, invertebrates, foxes and badgers. The close proximity of the swathe and cabling will seriously affect them during the construction phase and be likely to permanently destroy their habitat. The residents of Badliss Hall Cottages and Badliss Hall regularly use Home Farm Lane, Little Bromley Road and Morrow Lane for walking and accessing the footpaths. This will become impossible during the construction phase and will be permanently blighted by the swathe.

The proposed changes to Essex 4 are outlined below and still considered unacceptable. Until recently Wick Lane was a protected Green Lane. The extension westwards of the area of the public road that the 145 vehicles a day will be travelling along, combined with the further visibility modifications that will be necessary, will be ruinous to the nature of the lane. The National Grid proposals will put a permanent end to any such aspirations with significant construction and other traffic joining this mainly single-track lane.

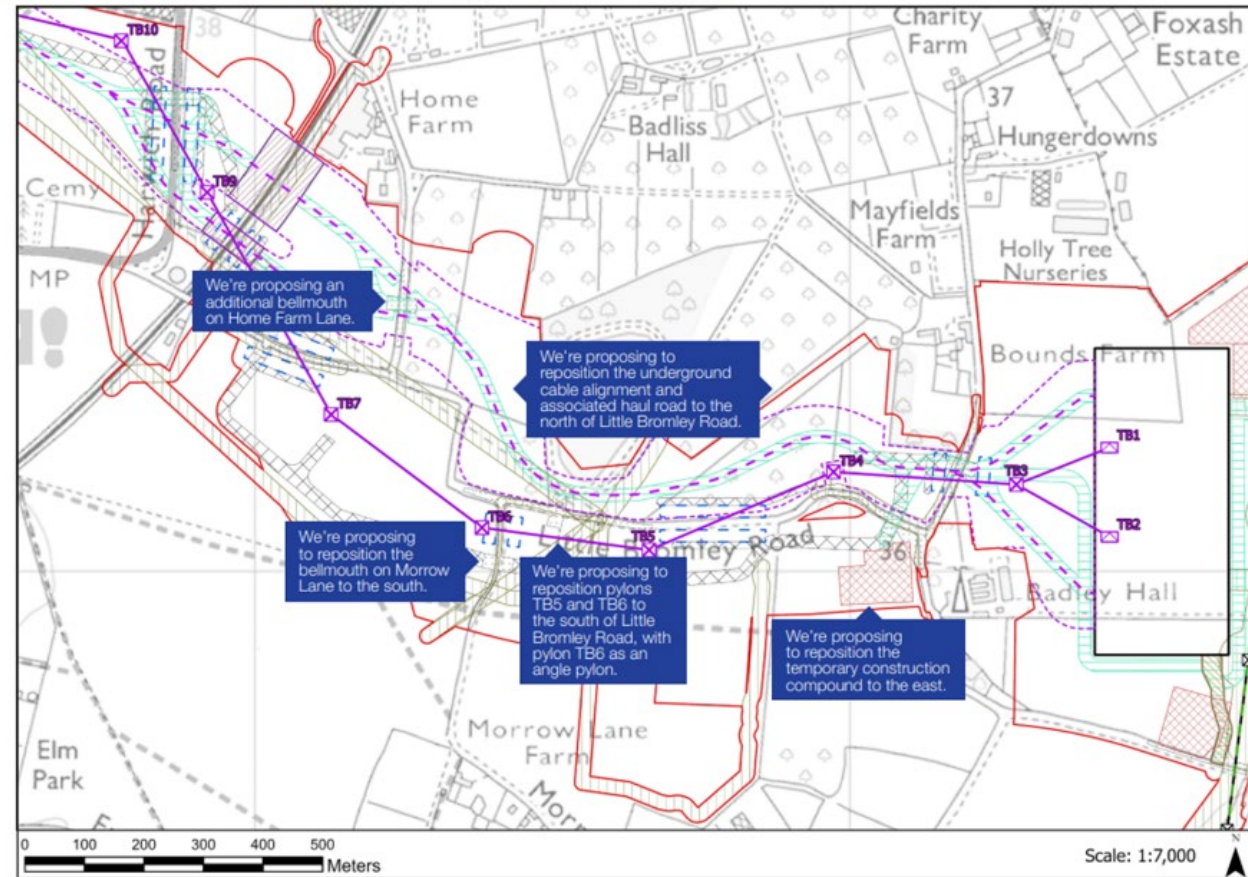
Our comments on the detailed changes for Ardleigh

List of proposals	Our comments
<p>Proposing to reposition the underground cable and overhead line alignments before they enter the East Anglia Connection Node (EACN) substation east of Ardleigh. You can see both the alignment presented at our statutory consultation in summer 2024 and our proposed change on the maps overleaf. The proposed change would not affect the location of the underground cable or the overhead line at the substation.</p> <p>This change is being proposed in response to consultation feedback which asked us to consider:</p> <ul style="list-style-type: none"> the potential outcome of consultation on the Essex Mineral Plan which could see land to the south of Little Bromley Road allocated as a site for silica sand extraction potential effects on fishing and horticulture to the north of Little Bromley Road. <p>Proposals</p> <ol style="list-style-type: none"> Proposing to reposition the underground cable alignment and associated haul road to the north of Little Bromley Road. 	<p>Both the previous and current proposals are too close to residential properties for people who live on Badliss Hall Lane, Home Farm Lane, Little Bromley Road, Morrow Lane and Hungerdown Lane. The new proposal has moved the construction lay-down area to surround, within metres, the properties by the railway bridge on Little Bromley Road.</p> <p>Spindles Farm, near to Essex 2, would lose an extra two fields (15 hectares previously and 26 hectares in the Targeted Consultation). This would leave one remaining field commercially uneconomical to manage, completely changing the way in which the farm is run and what can be grown.</p> <ul style="list-style-type: none"> The draft order limit has extended massively, right up to the farm's private garden. Existing ancient hedgerows which host an abundance of flora and fauna in Home Farm Lane would be ripped out. Spindles Farm's ongoing work with the RSPB as part of 'Operation Turtle Dove' (these birds are on the list of endangered species) would be terminated due to destruction of cultivated strips and feeding areas having to make way for proposed underground cabling and/or a 50m high pylon. Additionally, the proposed line of pylons now has more bends in it than previously, which is contrary to NG originally stating that they should be in a straight line. <p>No amount of mitigation that can improve this situation, other than finding an alternative, less destructive, means of transmission. Other options have been put forward by the community, campaign groups and Tendring District Council, which we do not think are being considered by National Grid.</p>

2. Proposing to reposition pylons TB5 and TB6 to the south of Little Bromley Road, with pylon TB6 as an angle pylon.
3. Proposing to reposition the bellmouth on Morrow Lane to the south.
4. Proposing an additional bellmouth on Home Farm Lane.
5. Proposing to reposition the temporary construction compound to the east.

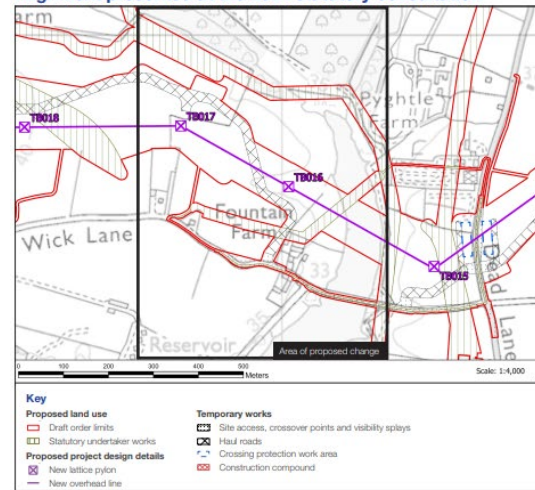
See below for the map extract for these changes. Note that the blue legends on the map obliterate some important elements of the proposed changes. Eg TB8 does not appear - has it been taken out?

Area of proposed change February 2025



<p>6. Permanent private access to EACN repositioned in line with landowner requests. Traffic would join Bentley Road and Ardleigh Road in the locations proposed in summer 2024.</p>	<p>Without evidence of the feedback which this proposal arises from (Summer 2024 statutory consultation) we find it difficult to make a comment.</p>
<p>7. Temporary construction access and haul road repositioned to the west at Fountain Farm</p>	<p>The proposed changes to Essex 4 between Fountain Farmhouse and Fairhaven and the haul road will turn one field into three rather than two. There is also a new access track between Fairhaven and Hollytrees Farmhouse where before there was not. This would be worse for some residents and better for others and, overall, the level of harm of both options is considered unacceptable.</p> <p>The NG images relating to this change is shown below</p>

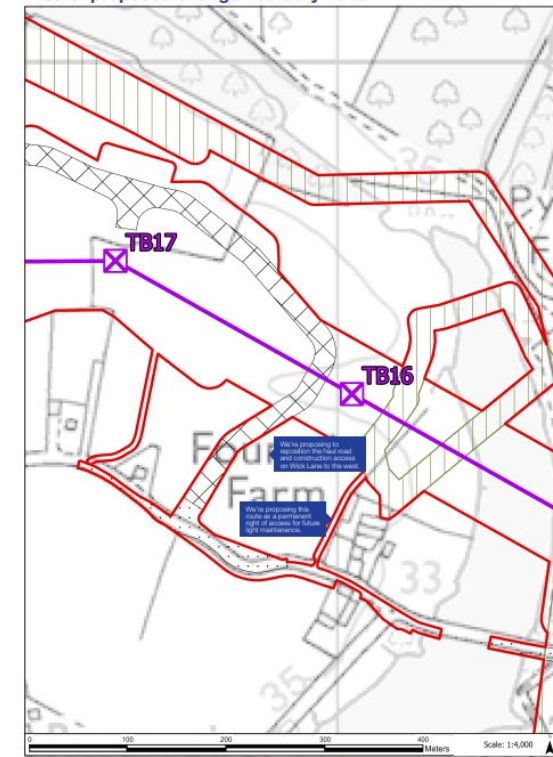
Alignment presented at the 2024 statutory consultation



National Grid | February 2025

Norwich to Tilbury | Essex 4

Area of proposed change February 2025



Essex 4 | Norwich to Tilbury

February 2025 | National Grid

Conclusion

Ardleigh Parish Council remain deeply concerned, on behalf of the community, that the cumulative impacts of this and three other associated infrastructure projects—Five Estuaries offshore windfarm, North Falls offshore windfarm, Tarchon connector station, have not been fully considered.

Greater integration across these projects, including full consideration of the Offshore Coordination Support Scheme (OCSS) outcomes, is now even more critical, but we do not see evidence that this is happening.

There is inadequate evidence of site selection for the EACN in Ardleigh which must be examined.

These are our proposed alternatives from our response to the Statutory Consultation of July 2024:

- A fully integrated offshore grid.
- The EACN to be removed from Ardleigh and, if needed, to be located offshore or on a Brownfield site in a coastal location.
- A subsea option which would include an alternative platform for Five Estuaries and North Falls. on one of the several Brownfield sites situated on or near the coastline in the region.
- High-Voltage Direct Current (HVDC) from Norwich to Tilbury subsea. HVDC cables offer several benefits over traditional Alternating Current (AC) cables, particularly in specific contexts such as long-distance transmission or undersea cables. We note, however, that, as far as agricultural land is concerned, undergrounding is generally worse as it affects the land permanently all along the route and the damage to land drains will take decades to rectify.
- The alternative underground High Voltage Direct Current (HVDC), proposed by the Electricity System Operator, would cause dramatically less harm, reducing the amount of damage to the southern boundary, Ardleigh, the Colne Valley and is achievable at comparable cost. It also offers huge advantages along the entire route from Norwich to Tilbury through being much more efficient electrically.
- HVDC or HVAC undergrounding along a route (which should itself be subject to consultation on a alternative routes) to remove Pylons from Ardleigh if the EACN was not relocated.
- The lack of coordination and clarity around the projects has caused our entire community to feel under siege. We maintain that the integration between, and consultation about, these projects is wholly inadequate and must be significantly improved.