

Response to National Grid Document 8.4.12.2 – Response to ISH2 Action Point 27 (Masterplans)

Ardleigh Parish Council and Little Bromley Parish Council maintain that National Grid's response to Action Point 27 is fundamentally unhelpful because it fails to provide the coordinated masterplan requested by the Examining Authority.

The point is not simply that the document is poor or incomplete. It is that the Applicant has failed to comply with the substance of the Examining Authority's request. Action Point 27 required masterplans to be provided, with an agreed position in terms of compensation measures for residual effects on the specified landscapes. The Applicant has instead produced a document whose principal purpose is to explain why such compensation may not be required.

The purpose of Action Point 27 was to understand how the substantial residual impacts of the Norwich to Tilbury Project could be addressed through coordinated landscape and environmental enhancement. That request mattered because this is an area facing permanent landscape change over the long operational life of the Project, together with the cumulative effects of multiple nationally significant infrastructure projects. A coordinated long-term strategy was therefore necessary in order to understand whether meaningful environmental enhancement could offset the permanent change to the landscape.

Instead, the Applicant has produced a document which repeatedly argues that such compensation may not be necessary. Throughout the submission, National Grid emphasises that the Opportunities Plans are illustrative only, are not mitigation, do not demonstrate that compensation is required, are not agreed with stakeholders and may never be delivered. That has an obvious planning consequence. None of the measures identified in the document are secured, deliverable or capable of implementation in their present form, and they therefore provide no mitigation or compensation capable of attracting any meaningful weight in the planning balance.

Consequently, the document fails to answer the question posed by the Examining Authority.

Draft Constraints Plan

Key points for the Examining Authority

- First, the Applicant has not complied with the substance of Action Point 27. The Examining Authority requested coordinated masterplans and an agreed position on compensation measures for residual effects. The

Applicant has instead produced draft constraints and opportunities plans, expressly caveated as illustrative and not agreed.

- Secondly, the measures identified in the Opportunities Plan are not mitigation or compensation capable of attracting weight in the planning balance. They are not secured by the draft DCO, are not supported by landowner agreements, are not funded, are not programmed and are not capable of assured delivery.
- Thirdly, the Applicant's own case is that the opportunities identified would not materially change the Environmental Statement assessment of landscape and visual effects. The document therefore does not demonstrate that the significant residual effects identified during the Examination would be avoided, reduced or compensated for.
- Fourthly, the absence of an agreed position is material. Action Point 27 expressly contemplated agreement on compensation measures. The Applicant's response confirms that no final agreed position has been reached and that further work would be required if any measures were considered necessary.
- Fifthly, the cumulative effects point remains unanswered. The East Anglia Connection Node, North Falls, Five Estuaries and the proposed Tarchon interconnector must be considered together. The Opportunities Plan does not provide a strategic or cumulative landscape response to those combined effects.
- Sixthly, the proposed measures are disproportionate to the magnitude and permanence of the harm. Broad indicative arrows for planting and green infrastructure cannot sensibly be treated as a response to the permanent industrialisation of the rural landscape caused by major electricity transmission and substation infrastructure.
- Finally, the Examining Authority should treat Document 8.4.12.2 as providing, at most, background information. It should not be treated as a coordinated masterplan, as secured mitigation, or as evidence that meaningful landscape compensation exists.

The Parish Council disagrees with the assumption that NG uses as starting point: “Views to the Project from within much of Ardleigh (including conservation area) largely filtered and screened by existing buildings and vegetation”

Draft Opportunities Plan

The Ardleigh and Little Bromley Opportunities Plan is particularly disappointing. It consists largely of broad arrows indicating possible tree planting, hedgerows and green infrastructure, but contains no meaningful explanation of what will actually be delivered, who will deliver it, when it will be delivered, how it will be funded or whether it is even achievable. The Plan bears the hallmarks of a high-level desktop exercise. Several of the proposed enhancement areas are factually inaccurate or incompatible with existing land uses, suggesting that insufficient site-specific assessment has been undertaken. For example:

- One of the arrows claiming to be ‘opportunities for connective green infrastructure enhancements’ goes from a small patch of trees into a commercial greenhouse site.
- Indicates tree and hedgerow planting on land adjacent to scheduled monument site, which is an area APC has previously highlighted to be of high archaeological potential.
- Only highlights one existing water body – Ardleigh Reservoir. It doesn’t for example highlight the reservoir on Little Bromley Road, the Fishing Lake and the new Crown Quarry reservoir (the map should extend further to include this area). These are important parts of the blue-green infrastructure.
- Glebe Corner is shown as 2 areas. Area 1 is partly owned by Essex CC but the area shown extends into a privately owned cultivated field. Area 2 is not Glebe Corner but an entirely privately owned cultivated field on the other side of the road.

The difficulty is therefore threefold. First, there is no strategy: no vision for the affected landscape, no stated objectives, no priorities and no explanation of how the proposed measures would work together as a coherent masterplan.

Secondly, there is no delivery mechanism: no funding, no landowner agreement, no implementation programme, no governance arrangement and no means by which the measures would be secured through the DCO. Thirdly, the factual inaccuracies identified below undermine confidence that the plans have been prepared following any sufficiently detailed assessment of the local area.

The Applicant itself acknowledges that much of the proposed enhancement lies on land outside its control and that no agreements have been reached with landowners. That is not a minor qualification. It means that the proposals are not secured, are not presently deliverable and cannot be treated as measures which would address the identified residual effects. Despite Action Point 27 expressly contemplating an agreed position on compensation measures, the Applicant has not produced an agreed position, nor has it undertaken the collaborative exercise necessary to convert broad illustrative ideas into a deliverable masterplan.

The proposals also bear no relationship to the scale of harm arising from the development. Ardleigh and Little Bromley face the permanent construction of the East Anglia Connection Node, associated 400kV overhead lines, cable infrastructure and the cumulative effects of the adjacent North Falls and Five Estuaries substations and the proposed Tarchon interconnector. Against infrastructure of this scale, the proposed response amounts to nothing more than indicative landscape planting. The proposed measures are wholly disproportionate to the magnitude and permanence of the adverse effects identified during the Examination. The document provides no evidence that such limited measures could in any meaningful way compensate for the permanent industrialisation of the local landscape.

Both Plans

The map used although made so opaque that it is virtually unreadable is also out of date. For example it doesn't show current route of footpath 27. It doesn't give any confidence that this exercise has been taken seriously.

Cumulative Effects

The document also fails to address cumulative impacts. Ardleigh Parish Council and Little Bromley Parish Council have consistently explained that the East Anglia Connection Node, North Falls, Five Estuaries and the proposed Tarchon interconnector must be considered together. While the Constraints Plan identifies neighbouring nationally significant infrastructure projects, the Opportunities Plan does not provide an integrated strategy for addressing their combined effects. It simply reproduces the same project-by-project approach which has characterised the Applicant's cumulative effects assessment throughout the Examination. A genuine masterplan should have considered the landscape as a whole rather than treating individual projects in isolation.

Conclusion

Perhaps most significantly, the document misunderstands the purpose of the Examining Authority's request. The Inspector did not ask whether compensation was justified; that is ultimately a matter for the Examination and the Secretary of State. The Inspector asked the Applicant to prepare coordinated masterplans and seek an agreed position on compensation measures. Instead of undertaking that exercise, much of the document is devoted to explaining why compensation should not be required.

The result is a submission that provides little practical assistance to the Examining Authority or to Ardleigh and Little Bromley. It contains no long-term vision, no deliverable programme, no secured funding, no implementation strategy and no measurable environmental outcomes. It is therefore not a coordinated masterplan in any meaningful sense.

In those circumstances, Document 8.4.12.2 cannot reasonably be treated as the coordinated masterplanning exercise requested by the Examining Authority. It follows that it cannot assist the Secretary of State in determining whether meaningful landscape compensation exists, or whether the identified residual and cumulative effects can be adequately addressed.

For these reasons, Ardleigh Parish Council and Little Bromley Parish Council maintain that Document 8.4.12.2 does not satisfy the intent of Action Point 27 and should not be afforded any weight. The Applicant has not demonstrated how the significant residual and cumulative impacts on Ardleigh and Little Bromley would be effectively addressed, nor has it provided the coordinated, deliverable master planning requested by the Examining Authority.

Ardleigh Parish Council

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