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Your ref: EN020027

By email: NorwichToTilbury@planninginspectorate.gov.uk

Dear Sirs

National Grid's DCO application re Norwich to Tilbury transmission line

1. This letter relates to National Grid's application for a DCO recently submitted to you. We understand PINS is considering whether it is acceptable to move forward. We know that you have had a letter about the lawfulness of the consultation process which has led up to the DCO submission from solicitors for the Essex Suffolk Norfolk Pylons action group (ESNP, formally Anglia Pylons East Ltd), which is an umbrella group concerned about the proposals up and down the line. Ardleigh Parish Council is a member of ESNP, and fully endorses the statements made by them. Having taken our own legal advice, we also write now because we believe it will assist PINS better to highlight the practical realities of the concerns ESNP raises, which are inevitably put in general terms, and to set out further specific concerns that Ardleigh Parish Council has regarding the lawfulness of the DCO submission.
2. Ardleigh Parish is located on the above proposed line and would be particularly badly affected by it and related ground stations, including relating to incoming power from two separate offshore wind projects and a converter station linked to an international interconnector project, if it proceeds as currently planned by National Grid. Further, sites identified for use by the above schemes are in addition to, and in some cases competing for land within the parish with requests for new sites for mineral extraction. Yet further land take for construction is identified for use by the proposed Garden community at Ardleigh's southern border.
3. Ardleigh's case study is a microcosm of what is an ill-thought-through project. The cumulative harms of all these projects, which are largely contingent upon one another and must be considered in the round, have not been considered during the consultation. Ardleigh is a rural parish, currently having around 5% of its 2,040 hectare area currently built upon. The land take for the schemes listed, should they be built, would capture in the order of 30% of available parish land, fundamentally altering the character of the parish in perpetuity. Failure to appreciate and consult upon the cumulative impact is of itself a serious deficiency.
4. NG may well have done a great deal of detailed work on Ardleigh and other areas working out how it could achieve the ends which it had pre-determined (ie. a pylons line with some undergrounding). However, what it has failed to do, and this is fundamental to ESNP's general complaint about unlawful pre-determination, is to have stepped back from that, at the very

start, and at least in the light of the first round of consultation, considered and consulted on other conceptual options for the whole project.

5. As explained by ESNP, and further highlighted here, NG's failures in this regard make the current submission unlawful. It fails against the Gunning legal principles relating to adequacy and fairness of consultation. And like ESNP, we also highlight the failure to apply the Treasury Green Book principles – not only wrong in law, but being an apparent attempt to misstate the true cost of the project, that, taking into account socio economic and natural capital costs, exceeds the stated capital cost of the Norwich to Tilbury project.

Ardleigh situation

6. We invite PINS to refer to our detailed submissions to NG's various consultations which we assume have accompanied what NG has asked PINS to consider. These are (besides related responses dealing with power from the various offshore projects coming ashore)
 - Response to East Anglia GREEN Consultation- June 2022
 - Comments to Planning Inspectorate on NG request for Scoping Opinion- December 2022
 - Consultation response- Summer (August) 2023
 - Statutory consultation response- July 2024
 - Targeted consultation response- March 2025
7. We explain there in detail the anticipated huge effects on Ardleigh, and why there has been obvious failure in the consultation process. You will see from those documents how from the beginning we have repeatedly raised the issue of what has plainly been and remains an unlawful process. (If you have not been supplied these documents, please of course let us know.)
8. For present purposes, the outline position is this. Ardleigh is in Essex, just to the south-east of Dedham Vale through which the line must be undergrounded. As you will see from the attached plan (and this is taken from NG's plan), the line comes in from the northeast underground (having been undergrounded to go through the Dedham Vale) and then skirts east, close to the northern side of Ardleigh village, to a substation (the EACN substation), and out again along pylons again close to Ardleigh.
9. It is immediately obvious that there is a triangle (becoming a line) of power lines threading their way around the fringes of Ardleigh village, which is a designated conservation area.
10. Even if undergrounding to pylons was the appropriate way forward, an obvious question arises namely why the proposed substation is not to the north-east of Ardleigh rather than as currently proposed which would avoid all of that. The proposed substation site sits upon Grade 1 farmland, which already only constitutes 2-3% of all England farmland, whereas brownfield sites exist to the north-east of the village.
11. Perhaps this is related to power intended to come in from the other offshore windfarms and where we understand a converter station may also be installed in the vicinity of the proposed NG substation. But if so, none of this was explained during the consultation process, including consideration of options such as requiring incoming power from the offshore generation to be HVDC and going underground to a converter station to the northeast of Ardleigh. Or indeed, being part of an HVDC offshore Norwich to Tilbury option.
12. In summary, for Ardleigh the proposals involve an inexplicable and apparently wholly unnecessary loop of underground HVAC power going one way and HVAC pylons going the other.

The corridor of land required for HVAC is much greater than for HVDC (if other offshore power generators are involved). HVDC undergrounded as mentioned above would (a) involve a narrower corridor through or around Ardleigh and (b) no pylons. As now conceived the cumulation of effects on our community are huge – and hugely unnecessary.

The big picture

13. The broader point arising from Ardleigh's situation is that NG has failed to consider obvious options. One is undergrounding the entire Norwich to Tilbury line with HVDC. Going through Dedham Vale and moving from underground to pylons (and vice versa: the same will be the case north of Dedham Vale) involving the use of substantial facilities such as that planned to the southeast of Ardleigh would be avoided, aside from facilities to connect with power coming in from offshore.
14. Incoming offshore power is plainly an important factor and involves consideration of an offshore grid as an alternative optimal solution. That is something that NG itself has advocated, and indeed as Ardleigh submits would anyway be an overall better option, but inexplicably it has played no part in the consultation procedure to date.
15. Ardleigh has raised these points with NG at different stages of the consultation, but at no stage has NG taken the trouble to explain why other options are impossible, let alone has it consulted upon the various options setting out their advantages and disadvantages so that the public and the many participating public authorities can express their views. Indeed, at no point during the consultation process did NG come to Ardleigh and engage directly with the public or the Parish Council, declining several invitations to do so. As ESNP explains, whether applied to Ardleigh or along the whole route, the failure to deal with options makes the DCO submission fundamentally flawed.
16. It is not of course PINS' task now to consider details of alternatives schemes at this stage. But we trust that some appreciation of the practical difficulties at Ardleigh with what is currently proposed will enable it to realise that NG has got to where it is by an unlawful route and that must not be allowed to proceed further without consultation in a lawful manner on the various options available.

Conclusion

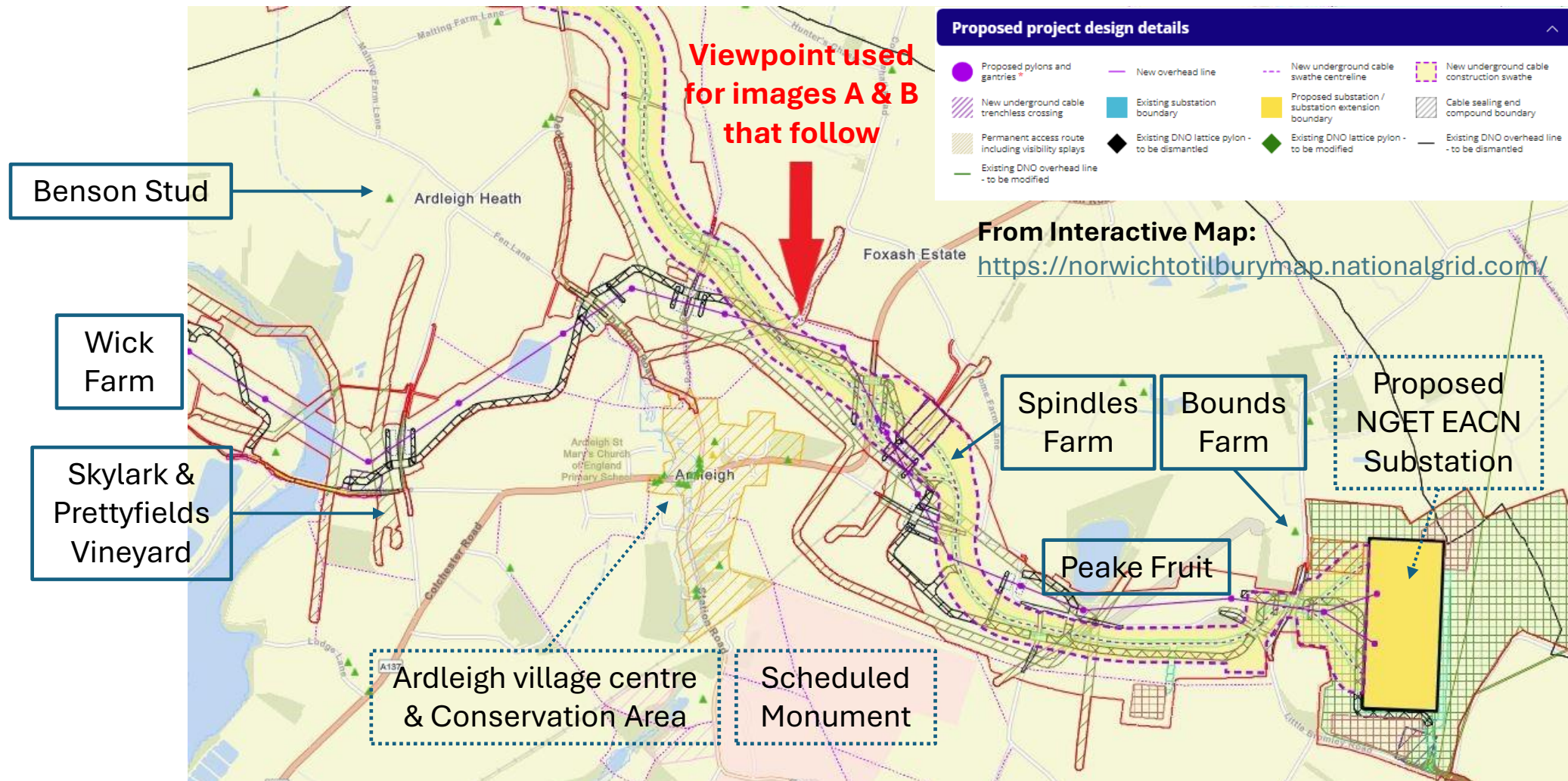
17. Ardleigh is rightly concerned about the proposals locally for all the reasons given in its detailed submissions. However, for present purposes, it writes now to ask PINS, in the national interest of seeing this matter dealt with expeditiously, to ensure that the next DCO stage starts from a lawful footing. No one wants to have what will likely be a very long DCO process frustrated by the delay occasioned by challenge to the premise on which the application was made.
18. Overall, the consultation process which has led to NG now making the DCO submission to PINS for the Norwich to Tilbury line does not stand legal scrutiny. We ask PINS to reject the application.

Yours faithfully



Rachel Fletcher
Parish Clerk and Proper Officer
For Ardleigh Parish Council

NGET Norwich to Tilbury infrastructure as presented at the 2024 statutory consultation (excludes alignment changes proposed by NGET in the February 2025 targeted consultation)



A

NGET proposal for new overhead lines to wrap around the village of Ardleigh:

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*View to the South East from the
viewpoint shown in slide 1*

Proposed location
of NGET EACN
Substation

Scheduled Monument
(1002146)

Conservation Area (CA26)

In this section it is also proposed
by NGET that 18 underground
HVAC cables closely follow the
OHL alignment to the proposed
EACN Substation

Toggles ⓘ

Season



Elevation



< Return to map

B

NGET proposal for new overhead lines to wrap around the village of Ardleigh:

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*View to the West from the viewpoint
shown in slide 1*

Conservation Area (CA26)

Grade II* listed St. Mary's
Church, Ardleigh (1112060)

Toggles

Season

Elevation

< Return to map