



**Ardleigh Parish Council  
Response to  
National Grid Norwich to Tilbury  
Statutory Consultation  
July 2024**

# **Historic Environment**

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## 1. Introduction

- 1.1. A defining feature of Ardleigh is its rich historical and archaeological character.
- 1.2. It is believed that the Parish has been continuously settled for more than 3000 years and therefore since Neolithic times.
- 1.3. Ardleigh appeared in the 1086 Domesday Book, with its population of 38 households placing it in the largest 20% of all settlements recorded at this time. It is notable that there are 5 entries for Ardleigh in the Domesday Book.
- 1.4. The Norman Conquest meant great changes for Ardleigh. The land was divided into four manors, which indicates the prominence of the settlement at that time.
- 1.5. Currently identified heritage assets include 71 listed buildings, a Conservation Area, a Scheduled Monument and a vast array of Non-Designated heritage assets, including the routes of Roman Roads.
- 1.6. It is the belief of local historians that a lot of valuable archaeology remains undiscovered. For example, the bronze age settlements to accompany the large urnfield burial site that forms the Scheduled Monument have not been found yet.
- 1.7. There is also surprise at the lack of Roman villas found in the area considering the large Roman presence. Nearby Colchester occupies the site of Camulodunum, the first major city in Roman Britain and its first capital. Roman brick was in fact used in the construction of St Mary's Church in Ardleigh<sup>1</sup>.
- 1.8. As stated by Colchester Archaeological Trust "*Ardleigh is rich in archaeological cropmarks representing prehistoric and Romano-British burials, boundaries and settlement*"<sup>2</sup>.
- 1.9. Between November 2023 and April 2024, a survey of the history and heritage of Ardleigh was conducted by Ardleigh residents. During this work it became clear how much interest, enthusiasm and knowledge resided in the village in relation to its history and heritage. By supplementing the entries from standard sources such as Historic England with detailed local knowledge and observations a unique perspective was gained. Such information is not available in computer records.
- 1.10. The work resulted in two supplementary documents: the **Ardleigh History and Heritage Survey Spreadsheet**<sup>3</sup> and the **Ardleigh History and Heritage Survey Overview**<sup>4</sup>. The spreadsheet contains all the information collected in the survey and the overview document was written on completion of the survey to highlight some of the key findings.

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<sup>1</sup> <https://historicengland.org.uk/listing/the-list/list-entry/1112060>

<sup>2</sup> Colchester Archaeological Trust <http://cat.essex.ac.uk/reports/CAT-report-0894.pdf>

<sup>3</sup> History and Heritage - Ardleigh\_V16.xlsx

<sup>4</sup> History and Heritage Survey - Ardleigh - Overview.pdf

- 1.11. The survey identified a total of 88 heritage assets in the Parish and attempted to quantify further by showing, for example, that the number of identified heritage assets located within 1km (0.6 miles) of the proposed infrastructure in Ardleigh is 64, of which 47 are listed buildings and 7 are HER monument sites. Whilst this gives an indication of the high “density” of these assets, the numbers do not fully convey the huge value they hold.
- 1.12. For all the heritage assets identified in the Ardleigh History and Heritage Survey a harm rating was assigned on a scale of 1 to 10. These are all listed in Ardleigh History and Heritage Survey Spreadsheet.
- 1.13. Further information on some of the heritage assets located in Ardleigh is included in the **Essex Suffolk Norfolk Pylons Action Group History & Heritage Survey**<sup>5</sup>.
- 1.14. The currently proposed siting for the pylons (towers), undergrounding, haul roads and substations would inevitably cause serious harm to the much-valued heritage and archaeology of Ardleigh, and indeed the character of the Parish.
- 1.15. Whilst this report focusses on the “Operational Effects”, as discussed in the accompanying reports in the Ardleigh PC submission, the huge scale of the proposed development in Ardleigh would also result in unquantifiable “Construction Effects”, noting for example the vulnerability of the many historic buildings due to typically poor foundations. In addition to the harm resulting from vibration induced by the construction machinery, there will be the additional vibration induced by up to 539 HGV vehicles a day entering the village for this project<sup>6</sup>.
- 1.16. During work on this report, it was noted that a significant number of heritage assets had been scoped out from further assessment by NGET. This and other issues relating to the methodology employed by NGET are covered in a separate report as part of the ESNP campaign group submission<sup>7</sup>.

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<sup>5</sup> [https://www.google.com/maps/d/u/0/viewer?fbclid=IwZXh0bgNhZW0CMTAAR3o\\_Xa06yVtquEQQIHV37wZZwzJaHFYtYL8W8-kv8-4B3akkECd8ovYAw8\\_aem\\_WicZrpS6xHFeQDQunfEDLg&mid=1YQZMpXUthLcLcYS7Eyx4AVsOzEiDRU&ll=51.92712157681941%2C0.9836065713181785&z=18](https://www.google.com/maps/d/u/0/viewer?fbclid=IwZXh0bgNhZW0CMTAAR3o_Xa06yVtquEQQIHV37wZZwzJaHFYtYL8W8-kv8-4B3akkECd8ovYAw8_aem_WicZrpS6xHFeQDQunfEDLg&mid=1YQZMpXUthLcLcYS7Eyx4AVsOzEiDRU&ll=51.92712157681941%2C0.9836065713181785&z=18)

<sup>6</sup> Norwich to Tilbury - PEIR - Volume 3 - Technical Appendices - Part 4 of 4 - p676-681

<sup>7</sup> Objection Statement, OBJECTION TO ‘NATIONAL GRID ROUTE BETWEEN NORWICH AND TILBURY’, Project Ref: FL12553, Written By: Virginia Gillece of Fuller Long HEA, Date: June 2024

## 2. Conserving and Enhancing the Historic Environment

2.1. Paragraphs 205 & 206 from Section 16 of the National Planning Policy Framework<sup>8</sup> (NPPF) are quoted below as important guidance when considering the potential impacts of the scheme:

### Considering potential impacts

205. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
206. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
  - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional<sup>72</sup>.

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<sup>72</sup> Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

These statements are very relevant to the heritage assets at risk of significant harm in Ardleigh, which include Grade II and Grade II\* listed buildings, a Scheduled Monument and many Non-Designated heritage assets. As outlined later in this report, in relation to footnote 72 of the NPPF, there are “*Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments*”. As such these “*should be considered subject to the policies for designated heritage assets*”.

Similar provisions are included in the Overarching National Policy Statement for energy (EN-1)<sup>9</sup>.

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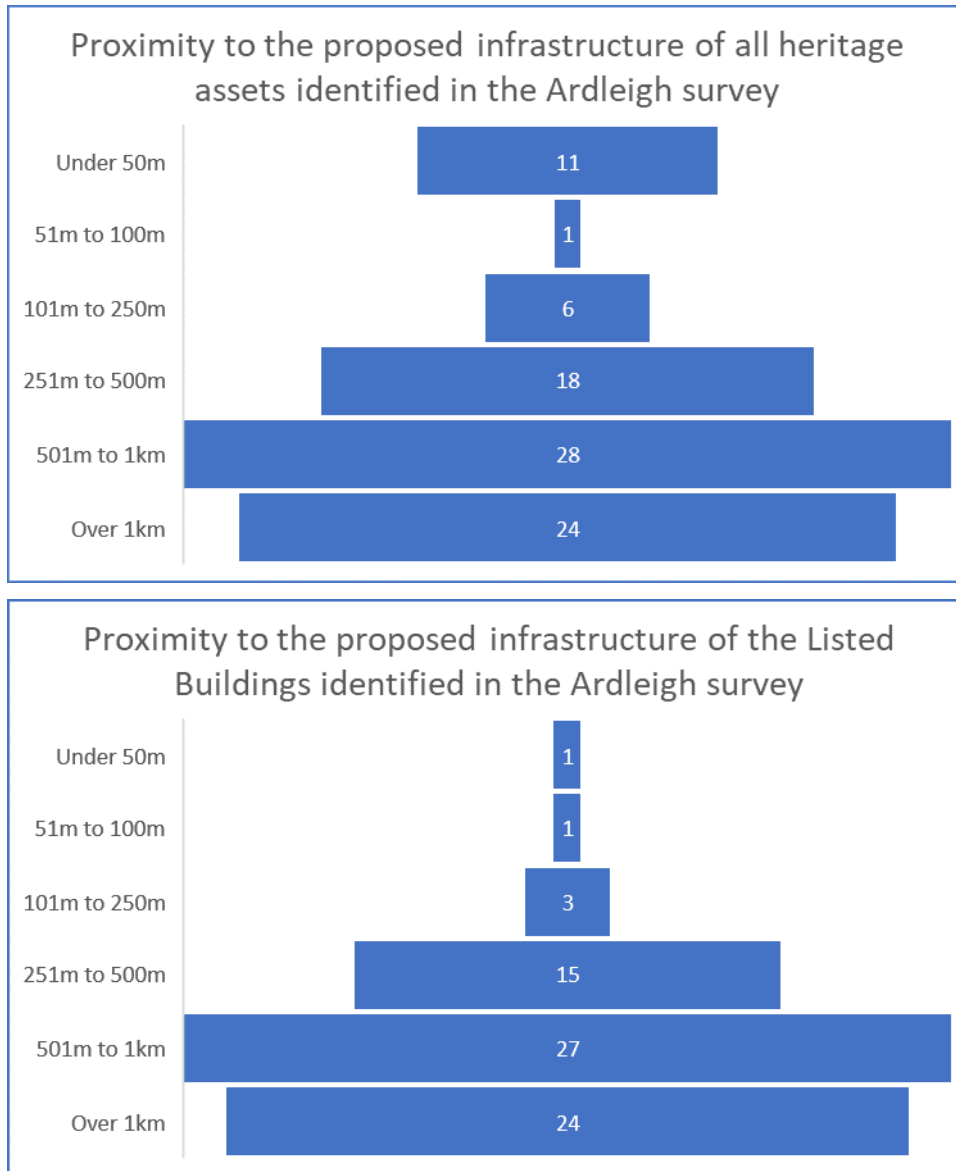
<sup>8</sup> National Planning Policy Framework, December 2023

[https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf)

<sup>9</sup> <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

### 3. Listed Buildings

- 3.1. There are 71 listed buildings in the Parish of Ardleigh. 69 of these are Grade II and 2 are Grade II\*. There is a notably high concentration of Grade II listed buildings at the historic core of Ardleigh village along Colchester Road and The Street. The Grade II\* listed St Mary's Church (1112060), parts of which date to the 14th century, is also prominently located here.
- 3.2. Details of all the listed buildings were recorded in the Ardleigh History and Heritage Survey Spreadsheet, along with all the other heritage assets that were identified. A standard set of questions was used based on Historic England guidelines. As outlined in the survey methodology, due to the large number of heritage assets in the village, the assets were broken down into three categories with differing levels of detail. For all listed buildings located within 1km of the proposed infrastructure basic information was included such as the proximity and the full "Official list entry" from Historic England. For those closer to the infrastructure much more detail was applied and for those further away less detail.
- 3.3. It is important to note that proximity data used for the survey was based on proximity to the proposed infrastructure. However, as revealed in the statutory consultation, the proximity to construction works can be considerably less. For example, the Scheduled Monument falls with the "101m to 250m" band in the survey (the recent statutory consultation plans in fact show the edge of the undergrounding to be as close as 99m). However, the draft order limit is as close as 25m to the boundary of the Scheduled Monument site.
- 3.4. The charts that follow summarise some of the data from the Ardleigh History and Heritage Survey Spreadsheet to show proximity of heritage assets to the proposed infrastructure. The first chart relates to all the heritage assets from the survey and the second just considers the listed buildings (of which there is a total of 69 Grade II and 2 Grade II\*). This illustrates, for example, that a high proportion of the assets near the proposed infrastructure are listed buildings.



**Figure 3.1: Proximity data extracted from the Ardleigh History and Heritage Survey**

- 3.5. The result is that most of the listed buildings in the Parish would be within sight of the pylons, including those in the Conservation Area at the heart of the village. This proposal will permanently damage the context and settings of these listed buildings and of wider heritage assets. One Grade II listed building is less than 50m away from the proposed infrastructure (which is the EACN substation in this case). Four Grade II listed buildings (excluding a Milestone) are less than 250m away from the proposed infrastructure. Further details are provided in the Ardleigh History and Heritage Survey Spreadsheet.
- 3.6. It is clear from the Zone of Theoretical Visibility (ZTV) plots that both the proposed overhead lines and the EACN substation will also be visible from within the Dedham Vale National Landscape (an AONB) as this area is less than

1.5 kilometres away. This will result in harm to listed buildings in Parishes outside of Ardleigh that fall within the National Landscape area. The location of these buildings could potentially be outside the consultation zone chosen by National Grid.

3.7. Copies of the ZTV plots relating to Ardleigh<sup>10</sup> are provided for reference in Appendices A-1, A-2 and A-3.

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<sup>10</sup> Preliminary Environmental Information Report Volume II – Figures. Part 10 of 27. April 2024.



## 4. Conservation Area

4.1. In recognition of its clear heritage value, a substantial proportion of Ardleigh village centre has been designated as a Conservation Area since 1981.

4.2. The Conservation Area Appraisal adopted by Tendring District Council in 2006<sup>11</sup> summarises the special interest of the Conservation Area as follows: “Ardleigh is a small medieval village at an important road junction, and retains its fine church and sequences of attractive vernacular buildings. The well-treed approaches to the north and the east are essential to the character of the village and are also included in the Area. The village expanded southwards in the 19th century, resulting in further groups of distinctive buildings, which with their settings are also recognised by Area designation.”



**Figure 4.1: Ardleigh Conservation Area**

View showing St Mary's Church and the medieval buildings at the crossroads in the centre of the village

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<https://legacy.tendringdc.gov.uk/sites/default/files/documents/planning/heritage%2C%20conservation%20%26%20trees/conservation%20areas/Whole%20DOC%20Ardleigh.pdf>

4.3. The “Ardleigh Conservation Area, Character Appraisal and Management Plan<sup>12</sup>” produced for Tendring District Council provides a useful overview of Ardleigh Conservation Area and demonstrates its high value.

4.4. In section “2.1 Context and General Character” it states: “Ardleigh is rural in character, surrounded by flat countryside comprised of open and agrarian fields. St Mary’s Church is a distinctive landmark at the centre of the village and forms part of the views encountered on approaches into the Conservation Area”.

4.5. In section “3.7 Key Views” it states: “Key views have been identified within the Conservation Area. Views from outside of the Conservation Area from which its special interest can be recognised, as well as key views from within the Conservation Area looking out to its setting, are also highlighted where appropriate. Key views are identified on Figure 29 [reproduced here as Figure 4.2]. The views included in this assessment are not exhaustive; for example, there are also glimpsed and kinetic views that contribute to the character and appearance. Any proposals for development within the Conservation Area, or its environs, should consider the views below and others which may be relevant or highlighted as part of a bespoke assessment of that proposal”.



**Figure 4.2: Map showing key views within the Conservation Area**

(Re. “Figure 29: Ardleigh Conservation Area, Character Appraisal and Management Plan”)

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<sup>12</sup> Ardleigh Conservation Area, Character Appraisal and Management Plan, Client: Tendring District Council Date: June 2023, Place Services  
<https://tdcdemocracy.tendringdc.gov.uk/documents/s60772/A1%20Appendix%201%20Ardleigh%20CA%20AMP.pdf>

- 4.6. It goes on to say: “...There are two locations from within the Conservation Area where the setting can be appreciated through views out towards the surrounding open countryside. Firstly, where the informal green wedge along The Street leads to a public footpath giving views across open countryside. Secondly, where the cemetery terminates and there is a gap in the hedge to the southside of Harwich Road”.
- 4.7. The views from both locations would be severely blighted by the proposed pylons.
- 4.8. In relation to the first location “the informal green wedge along The Street”, this is the most northerly viewpoint in Figure 4.2. Pylons TB010, TB011 and TB012 would be in close proximity and very visible across the open fields. Of these, pylon TB011 would be just 280m away from this point.
- 4.9. Figure 4.3 is a photograph taken from a 3D visualisation presented at a NGET 2024 statutory consultation event. This represents the position and direction of this viewpoint. The “informal green wedge” is the grassed area beneath the tall tree. The “public footpath giving views across open countryside” is “Ardleigh 2” which is located between the tall tree and the adjacent bungalow (represented in the visualisation as a grey block). The pylon shown is TB011. This clearly shows the harm caused to the views from this part of the Conservation Area. The views appear quickly as the open countryside is approached along the public footpath.



**Figure 4.3: Photograph taken from NGET visualisation of “informal green wedge”**

- 4.10. The “*informal green wedge*” is a valued green space in the village. It is a historic verge located in one of the oldest parts of the settlement, in proximity of one of its former original manor houses, Ardleigh Hall, that had appeared in records as far back as the Domesday Book. The verge appears in its current form on the 1897 OS Map<sup>13</sup>. It should also be noted that the draft order limit encroaches on this green space.
- 4.11. This location also corresponds closely with NGET Viewpoint 3.11, which is at the start of PRow “Ardleigh 2”.
- 4.12. In PEIR Volume III – Technical Appendices<sup>14</sup>, in relation to Viewpoint 3.11 it states: “*The viewpoint is representative of people living and moving around the northern edge of Ardleigh, including using the local PRow network. There are open views across flat arable farmland to the north and east...The Project would be approximately 0.2 km to the north at its closest point. There would be close views of the overhead line on the skyline to the west, north and east. The EACN would be perceptible on the skyline in views to the east*”.
- 4.13. The location of this viewpoint is shown in the map provided in Preliminary Environmental Information Report, Volume II: Figures Part 10 of 27<sup>15</sup>. It is noted that this visual receptor has the title “*Landscape & Visual and Heritage (PEIR Wireline and ES Photomontage)*”. This is the only visual receptor near Ardleigh village centre and the only one in the Parish with a heritage designation. This is clearly inadequate.
- 4.14. The corresponding “Wireline Visualisations” are provided in Preliminary Environmental Information Report, Volume II: Figures Part 16 of 27<sup>16</sup>: Figures 13.9.35 - 13.9.42 - Wireline Visualisations. The visualisations relating to this viewpoint are figures 13.9.42a to 13.9.42f. From these, Figures 13.9.42a to 13.9.42f have been reproduced here for reference as Figures 4.4 and 4.5.
- 4.15. It should be noted that the Wireline Visualisations presented in Volume II of the PEIR provided a very poor representation of the proposed infrastructure. Representing the infrastructure in a blue colour greatly diminishes the visual impact against a blue or grey sky, and indeed most other backgrounds. In many lighting conditions the pylons and overhead lines appear black resulting in a contrast much greater than that presented. This leads to a much more

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<sup>13</sup> p35 “Green spaces - site assessments 0508 PDF” <https://img1.wsimg.com/blobby/go/35e229d7-0729-4580-8608-6221bf69b316/downloads/Green%20spaces%20-%20site%20assessments%200508%20PDF%20comp.pdf?ver=1720027943383>

<sup>14</sup> Preliminary Environmental Information Report, Volume III – Technical Appendices – 4 of 4, April 2024, page 198

<sup>15</sup> Preliminary Environmental Information Report, Volume II: Figures Part 10 of 27: Figure 13.7 - Landscape and Visual - Visual Receptors Page 6 of 11

<sup>16</sup> Preliminary Environmental Information Report, Volume II: Figures Part 16 of 27: Figures 13.9.35 - 13.9.42 - Wireline Visualisations

“industrialised” landscape. It is noted in fact that in the photographs used for the covers of most of the NGET statutory consultation reports the OHLs appear black.



**Figure 4.4: NGET “Figure 13.9.42a” showing TB011**



**Figure 4.5: NGET “Figure 13.9.42f” showing route of pylons towards the EACN. Ardleigh Conservation Area is to the right of the image.**

4.16. The second of the two outward looking viewpoints referenced in the “Ardleigh Conservation Area, Character Appraisal and Management Plan” is described as “*where the cemetery terminates and there is a gap in the hedge to the southside of Harwich Road*”. This is the most easterly viewpoint in Figure 4.2.

4.17. From here, looking in a south easterly direction the long run of pylons leading to the EACN substation would be in view. TB007, TB008 and TB009 would be in closest proximity. TB008 would be just 375m away. Whilst TB009 would be in peripheral vision, if the viewing direction shown is taken literally, its location just 275m away would make it very dominant. The serpentine route of the overhead lines around the village increases the visual impact. This is compounded by the need for the more visually intrusive angle towers due to the non-linear alignment.

- 4.18. Figure 4.6 represents the view from this viewpoint when looking in an easterly direction. This is a screen shot taken from the 3D model used by NGET for visualisations at the statutory consultation public information events. The harm to this view from the Conservation Area is very apparent.



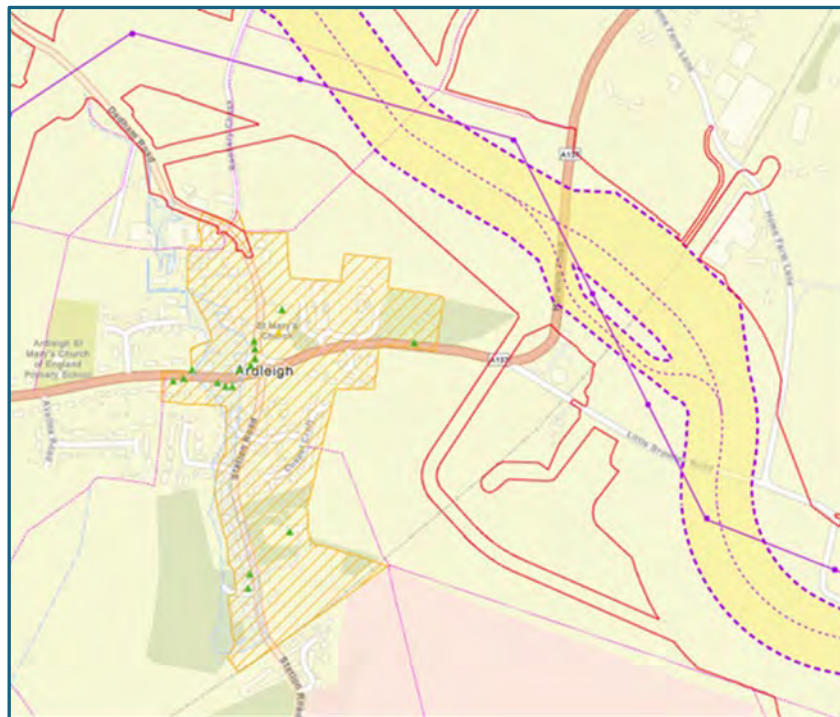
**Figure 4.6: Screenshot from NGET visualisation “where the cemetery terminates and there is a gap in the hedge to the southside of Harwich Road”**

- 4.19. The Ardleigh Conservation Area, Character Appraisal and Management Plan also discusses the “Setting of the Conservation Area” in section 3.8. Here it quotes the following: “*Historic England Good Practice Advice 3: Setting of Heritage Assets (2017) indicates that the setting of a heritage asset is the surroundings in which the asset is experienced. It goes on to note ‘Where that experience is capable of being affected by a proposed development (in any way) then the proposed development can be said to affect the setting of that asset’*”
- 4.20. Furthermore, it states: “*Ardleigh Conservation Area draws its significance from key features outside of its boundary. The Conservation Area is surrounded by arable and open landscape; there are only a few locations from within the area that the setting can be viewed which contributes significantly to the rural character of the Conservation Area*”.
- 4.21. Section 2.6 of The Ardleigh Conservation Area, Character Appraisal and Management Plan discusses “*Archaeological Potential*” and states “*The Conservation Area has potential for the preservation of significant archaeological remains dating from the prehistoric to postmedieval period. The extensive and ongoing excavations which have taken place have revealed extensive multiperiod archaeological remains to the south and southeast of the village. The area is particularly rich in Bronze Age, Iron Age and Roman remains*

*and a number of currently undated cropmarks within and surrounding the Conservation Area are likely to date from these periods”.*

4.22. There are 17 listed buildings in the Conservation Area, as detailed in the Ardleigh History and Heritage Survey Spreadsheet. With careful use of the zoom function the Norwich to Tilbury Interactive Map also indicates 17 listed buildings, as shown in Figure 4.7. However, the definitive Environmental Constraints Plan “Norwich to Tilbury - Environmental Constraints - Section C”<sup>17</sup>, which is a formally controlled document, shows just 2 of the 17 listed buildings in the Conservation Area. This is copied here as Figure 4.8. The same applies to “Figure 11.2 - Historic Environment - Designated Heritage Assets Within Study Area, Page 6 of 11” in Volume II of the PEIR.

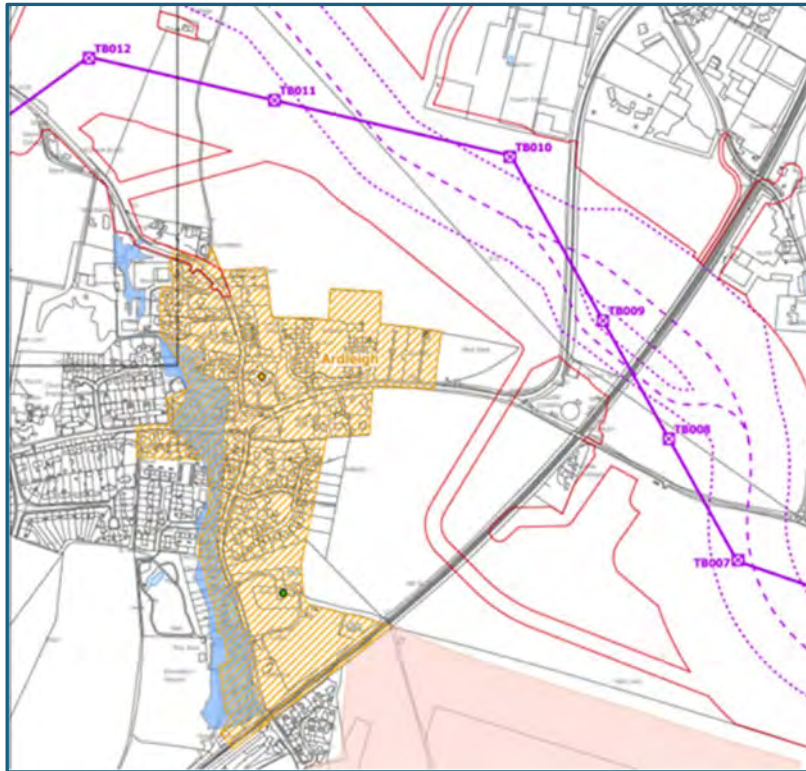
4.23. This will therefore severely reduce the value given to the heritage assets in the NGET assessment and create a false impression to anyone else viewing these maps.



**Figure 4.7: Image from the Norwich to Tilbury Interactive Map**

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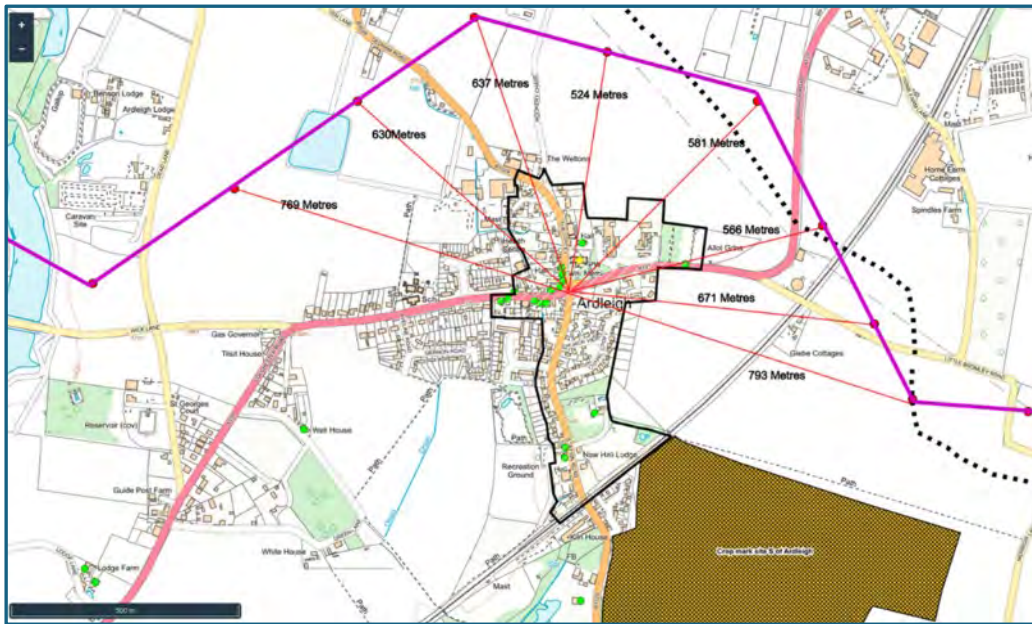
<sup>17</sup> National Grid Drawing Reference: AENC-NG-ENG-PLN-0012, SHEET 11 OF 16, Issue A, Date: APRIL 2024



**Figure 4.8: Image from Environmental Constraints Plan “Norwich to Tilbury - Environmental Constraints - Section C”**

- 4.24. Figures 4.7 and 4.8 also show how close the proposed infrastructure, both overhead lines and underground cables, is to the Conservation Area and how the draft order limit encroaches on it.
- 4.25. The proposed pylons TB007 to TB015 would form a 50m fence around over half of the Conservation Area. Three of these pylons TB009 to TB011 would be less than 300m away from the edge of the Conservation Area, with TB009 being just 250m away. The diagram in Figure 4.9 shows approximate distances from the pylons to the centre of the Conservation Area.





**Figure 4.9: Proximity of pylons to the centre of the Conservation Area**

4.26. In the “Conservation Areas” section of the PEIR<sup>18</sup>, paragraph 3.4.57 states: “Ardleigh conservation area (CA26) is located partly within the draft Order Limits. It is a small medieval village located at an important road junction (Tendering District Council 2006) between The Street (north), Station Road (south), Harwich Road (east) and Colchester Road (west). It retains its church (Church of St Mary 1112060, Grade II\* listed) and many vernacular buildings. The well-treed approaches to the north and the east are essential to the character of the village. The village expanded southwards in the 19th century, resulting in further groups of distinctive buildings. Bordering the conservation areas southern edge is a scheduled monument, Crop mark site S of Ardleigh (1002146). Overall, the asset is of high value due to its historical and aesthetic values”.

4.27. Paragraph 3.4.58 states: “Ardleigh has potentially had a very long history. Located to the south, and ordering the conservation area, are scheduled cropmarks (1002146). Potentially the focus of activity and settlement was located near to the road or within the boundary of the conservation area. Given how close these assets are to the draft Order Limits they add archaeological potential to the draft Order Limits. These features and archaeological remains add evidential value to the conservation area, particularly to its southern part”.

<sup>18</sup> Preliminary Environmental Information Report Volume III – Technical Appendices – 3 of 4 April 2024

- 4.28. From the previous two paragraphs it is therefore appropriate to conclude that the Conservation Area “...is of high value due to its historical and aesthetic values” and this is partly due to the additional “evidential value” from the adjoining Scheduled Monument (1002146).
- 4.29. It should also be noted that, as previously highlighted, there are 17 listed building in the Conservation Area not the 2 considered in the NGET assessment. As discussed later in this document there are also significant Non-Designated assets, including archaeology, within and adjacent to the Conservation Area. This includes an Iron Age ring ditch near the crossroads and the route of a Roman Road passing through it. These assets significantly contribute to its heritage value.
- 4.30. The importance of these and other Non-Designated heritage assets to the Ardeleigh Conservation Area, and indeed generally, is emphasised in the “The Ardeleigh Conservation Area, Character Appraisal and Management Plan<sup>19</sup>” under section “2.4 Non-Designated Heritage Assets”: “Every building, space and feature within a conservation area makes a contribution to its character and special interest, be it positive, neutral or negative. Heritage assets are defined in Planning Policy as ‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.’ Not all heritage assets are listed, and just because a building is not included on the list does not mean it is of no heritage value. Buildings and other structures of the built environment such as fountains, railings, signs and landscaping can make a positive contribution to the appreciation of an area’s historic interest and its general appearance”.
- 4.31. “The Ardeleigh Conservation Area, Character Appraisal and Management Plan” goes on to acknowledge the “Contribution of Key Un-Listed Buildings” and states: “There are numerous buildings that contribute to the character and appearance of the area, however some are considered to make a key contribution and have been identified...”. It states that they include: “The Hollies”, “Numbers 1-6 The Street and Post Office”, “Church Hall (west of the Vicarage)” and three additional buildings. These buildings are all close to the proposed tall infrastructure as it wraps around the village. For example, TB011 is located approximately 320m from “The Hollies”, with the draft order limit terminating just 16m away. Figure 9 of “The Ardeleigh Conservation Area, Character Appraisal and Management Plan” is a helpful map showing “significance of buildings within the Conservation Area”. In the NGET

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<sup>19</sup> Ardeleigh Conservation Area, Character Appraisal and Management Plan, Client: Tendring District Council Date: June 2023, Place Services  
<https://tdcdemocracy.tendringdc.gov.uk/documents/s60772/A1%20Appendix%201%20Ardleigh%20CA%20AMP.pdf>

assessment of the Conservation Area no consideration was given to Non-Designated heritage assets.

- 4.32. The high value assessment attributed to the Conservation Area is though contradicted elsewhere in the PEIR document under both Preliminary Construction Effects and Preliminary Operational Effects, Ardleigh Conservation Area (CA26). Here it is assigned a “*Medium*” value (ref. Tables A11.2.9<sup>20</sup> & A11.2.42<sup>21</sup>) and this is therefore a significant error.
- 4.33. Further on within the “*Conservation Areas*” section of the PEIR, in relation to Ardleigh, paragraph 3.4.64 states “*The area very much retains its historical setting. Due to this its setting makes a considerable contribution to its value. As the draft Order Limits are located close to the conservation area and due to the flat topography of the surrounding landscape, the setting of the conservation area extends into the draft Order Limits*”.
- 4.34. Under Preliminary Operational Effects it states: “*The Project would introduce tall infrastructure within the setting of the asset, causing a minor change to the rural aspect of the asset’s setting, which makes a moderate contribution to its value*”.
- 4.35. This statement is also strongly contested as the change to the asset’s setting resulting from the ring of pylons around the Conservation Area would be major. The important connection between the Conservation Area and the rural setting is discussed in detail earlier in this section. As stated in the “*The Ardleigh Conservation Area, Character Appraisal and Management Plan*”: “*Ardleigh Conservation Area draws its significance from key features outside of its boundary*”. Not only would it impact the rural aspect, but it would also impact the much-valued historical setting noting that “*due to the flat topography of the surrounding landscape, the setting of the conservation area extends into the draft Order Limits*”.
- 4.36. As the asset was incorrectly assessed as medium value instead of high value, the impact will be even greater. Similarly, the statement of “*Not significant negative effect*” under the heading “*Significance of Effect*” is strongly contested. It is noted though that there is recognition that “*There is no suitable mitigation to reduce this effect*”, which further increases the resulting harm.
- 4.37. Located in the Conservation Area is the Grade II\* listed St. Mary’s Church, Ardleigh (1112060). This is included in the “*Landmark Buildings*” section of “*The Ardleigh Conservation Area, Character Appraisal and Management Plan*”. It states the following: “*The area contains the Grade II\* listed Church of St Mary. Due to its local importance, use and scale, it is a key landmark within the*

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<sup>20</sup> Table A11.2.9: Preliminary Construction Effects on Conservation Areas – Section C

<sup>21</sup> Table A11.2.42: Preliminary Operational Effects on Conservation Areas – Section C

*Conservation Area. There are views of the tower from several locations within the Conservation Area”.*

4.38. In the PEIR the following is stated in relation to this asset: *“The setting of the asset contributes considerably to its value, as the church created so [to?] serve the rural community of Ardleigh. The setting of the asset does extend to the draft Order Limits, which pass close to the edge of the settlement and the reach of the church, both in terms of its parish setting and also visually due to the height of the church tower. The asset has historical, aesthetic and communal value and is high value<sup>22</sup>.”*

4.39. Later in the same document the Preliminary Operational Effects are tabulated<sup>23</sup>. Here it states: *“The Project would introduce tall infrastructure within the setting of the asset, causing a minor change to the rural aspect of the asset’s setting, which makes a moderate contribution to its value”*. For reasons discussed later in this section, this statement is strongly contested as the change to the rural aspect would be major and rural aspect contributes considerably to the high value described in the PEIR, as quoted in the previous paragraph. Similarly, the statement of *“Not significant negative effect”* under the heading *“Significance of Effect”* is strongly contested. It is noted though that there is recognition that *“There is no suitable mitigation to reduce this effect”*, which further increases the resulting harm.

4.40. Due to the extremely flat topography, the church tower dominates the skyline from viewpoints all around the village and as a result the proposed pylon backdrop would severely harm the current setting. It is noted that no wireline visualisations or similar representations were included in the documents presented by NGET to back-up the *“Not significant negative effect”* assertion in relation to this building, even though it is recognised as a high value asset.

4.41. The photograph in Figure 4.10 was taken from a position between proposed pylons TB011 and TB012. It shows that the tall infrastructure will not only be visible from St. Mary's Church, Ardleigh (1112060), but that the beautiful and tranquil landscape that contributes towards the special interest of this Grade II\* heritage asset will be substantially impacted and harmed as a result.

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<sup>22</sup> Para 3.4.319: Preliminary Environmental Information Report Volume III – Technical Appendices – 3 of 4 April 2024

<sup>23</sup> Table A11.2.40: Preliminary Operational Effects on Listed Buildings – Section C



**Figure 4.10: Ardleigh village skyline**

The Church and Conservation Area viewed from between proposed pylons TB011 & TB012

- 4.42. The photograph in Figure 4.11 shows the prominence of the church tower in the skyline from a vantage point 700m away. This was taken from where footpath “Ardleigh 5” meets Green Lane.
- 4.43. The image in Figure 4.12 is a screen shot taken from the 3D model used by NGET at the statutory consultation public information events to illustrate the proposals, using a similar viewpoint to Figure 4.11. This demonstrates how the tall infrastructure would form a backdrop to the entire vista and would tower over St. Mary's Church, Ardleigh (1112060) and the rest of the Conservation Area.



St Mary's Church,  
Ardleigh

**Figure 4.11: Ardleigh village skyline**

View towards St Mary's Church Ardleigh and the Conservation Area from Green Lane



St Mary's Church,  
Ardleigh

**Figure 4.12: Screenshot from NGET visualisation to show Ardleigh village skyline with the proposed OHLs**

- 4.44. The visibility of the church tower and the flat landscape is demonstrated by the viewing distance shown in the photographs taken from the church tower in Appendices B-1 and B-2.
- 4.45. As the church tower is substantially lower in height than the pylons, the pylons would be visible from an even greater distance.
- 4.46. In one of the photographs in Appendix B-2 the Water Tower at Horsley Cross can be seen. This is 30m in height and is located approximately 7.2km away from the tower of St. Mary's Church, Ardleigh (1112060).
- 4.47. Images taken from a drone flown at a height of 50m in the location of one of the proposed pylons (TB15) are provided in Appendix C to demonstrate the visibility of just one pylon in the flat landscape of Ardleigh. A helium balloon flown from the same location at a height of less than 50m, was very visible from St Mary's Primary School despite being 0.7km away (but closer to other pylons) and was indeed visible from much greater distances throughout the village.
- 4.48. St Mary's Church (1112060) in the village centre, which is marked on one of the drone images, is just over 1km from proposed pylon TB15 where the drone images were taken. This pylon on its own would impact the whole of the historic village centre. The effect would be multiplied by the other pylons that are planned to be located much closer to the church and village centre.
- 4.49. It can also be seen from the drone images that the pylons would be visible across huge swathes of beautiful countryside, extending greatly beyond Ardleigh.
- 4.50. Out of the remaining 16 Listed buildings in the Conservation Area (CA26) only New Hall (1112056) is referenced but this isn't included in the Preliminary Operational Effects review table.
- 4.51. The setting of the Conservation Area and all heritage assets located within it would be severely impacted by the scheme. This applies to both designated and Non-Designated heritage assets. The two supplementary documents: the **Ardleigh History and Heritage Survey Spreadsheet**<sup>24</sup> and the **Ardleigh History and Heritage Survey Overview**<sup>25</sup> provide detailed information on the assessments of all heritage assets undertaken by Ardleigh residents.
- 4.52. Only by considering all the assets can the cumulative impact be properly assessed. By NGET scoping-out 15 of the 17 listed buildings in the Conservation Area and not considering Non-Designated assets this has not been achieved.

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<sup>24</sup> History and Heritage - Ardleigh\_V16.xlsx

<sup>25</sup> History and Heritage Survey - Ardleigh - Overview.pdf

## 5. Scheduled Monument

- 5.1. The Scheduled Monument (1002146) has the title: “Crop mark site S of Ardleigh”<sup>26</sup>. It consists of crop circles showing bronze age burial sites, ditches and trackways and has produced a huge number of archaeological finds from the earliest Neolithic finds through the Bronze Age, Roman period, Iron Age and Saxon period. The largest Bronze Age urnfield ever discovered in England was found near Vines Farm. This shows that Ardleigh was a flourishing community in the years 1400BC to 800BC. A Roman pottery kiln was also located on this site.
- 5.2. The setting is an important aspect of a heritage asset and with tall infrastructure proposed to be sited adjacent to the Scheduled Monument in Ardleigh, the setting would be substantially impacted and harmed.
- 5.3. The site is on a plateau in a landscape that hasn't changed substantially since these early settlements. When visiting the site, it is easy to visualise the lives that were led in much earlier times. Images such as the paintings by Roger Massey-Ryan, the crop marks, the field patterns and other recorded evidence of the settlements, help in placing this within the context of the current landscape.



**Figure 5.1: Bronze Age Landscape at Ardleigh, c.1200 BC.**

**Painting by: Roger Massey-Ryan**

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<sup>26</sup> “Crop mark site S of Ardleigh” List Entry Number: 1002146 <https://historicengland.org.uk/listing/the-list/list-entry/1002146>



5.4. In relation to the setting, Annex 2: Glossary of the National Planning Policy Framework<sup>27</sup> states the following:

*Setting of a heritage asset*

*“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”*

- 5.5. The proximity of the proposed overhead line and pylons, the EACN substation and the underground cable swathe would be very detrimental to the setting of this Scheduled Monument. The centre line of the proposed 50m high overhead line and pylons is as close as 263m to the Scheduled Monument boundary. The proposed EACN substation is only around 1km away.
- 5.6. This would result in the cumulative visual impact from both the overhead lines and the EACN substation across the entire Scheduled Monument site. This is clearly illustrated in the Zone of Theoretical Visibility (ZTV) maps within the Preliminary Environmental Information Report (PEIR)<sup>28</sup>, which are copied in Appendices A-1 to A-3.
- 5.7. From PEIR “Figure 13.8.1 - Landscape and Visual - Zone of Theoretical Visibility (ZTV) of Proposed 400kV Overhead Line (Numbers of Pylons) Page 6 of 11”, pylons would be highly visible across the whole of the Scheduled Monument site. Significant sections of the site fall within the band where 21-30 pylons are theoretically visible.
- 5.8. With reference to PEIR “Figure 13.8.2 - Landscape and Visual - Zone of Theoretical Visibility (ZTV) of Proposed 400kV Overhead Line (Proportions of Pylons) Page 6 of 11”, for virtually the whole area of the Scheduled Monument site the full pylon structure is theoretically visible.
- 5.9. The impact from the pylons is compounded by the proximity of the proposed EACN substation. From PEIR “Figure 13.8.7 - Landscape and Visual - Zone of Theoretical Visibility (ZTV) of the East Anglia Connection Node (EACN)” there is theoretical visibility of the East Anglia Connection Node (EACN) across the whole Scheduled Monument site.
- 5.10. There would therefore be widespread visibility of both the overhead lines and the EACN substation from the Scheduled Monument site.

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<sup>27</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

<sup>28</sup> Preliminary Environmental Information Report Volume II – Figures. Part 10 of 27. April 2024.

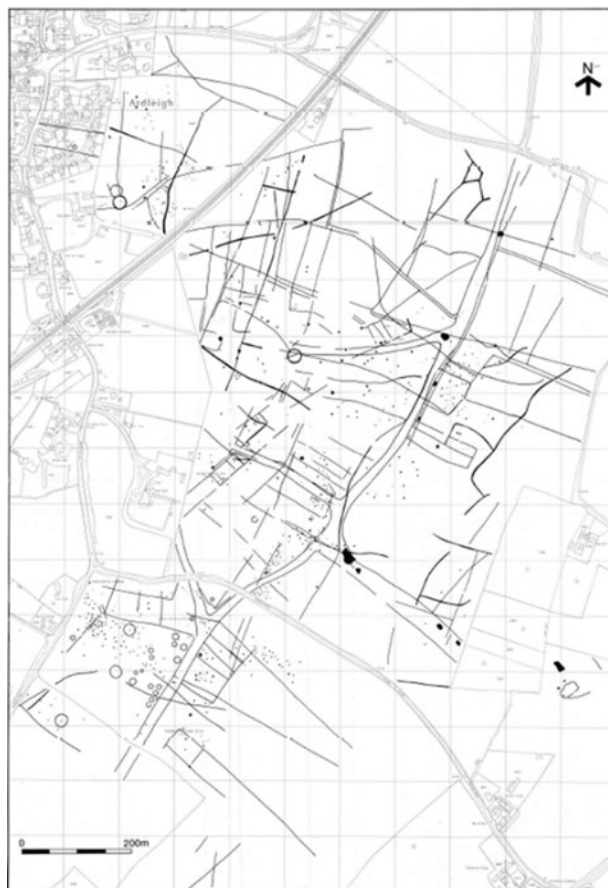
5.11. No evidence was apparent that “Historic England Good Practice Advice in Planning Note 3 (GPA3)” was used by NGET in assessing the setting<sup>29</sup>.

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<sup>29</sup> The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) December 2017 <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

## 6. Harm to Non-Designated Assets Near Scheduled Monument

- 6.1. The proximity of the proposed infrastructure on land immediately to the north of the Scheduled Monument “Crop mark site S of Ardleigh” (1002146) is also of great concern in relation to Non-Designated heritage assets in the area. The nearest section of the underground cable swathe is just 98m away from the northern boundary of the Scheduled Monument site and the draft order limit just 25m away.
- 6.2. It is inconceivable that the ancient settlements were limited to the site of the Scheduled Monument. There is known to be unexcavated archaeology in the surrounding area. The whole area has the title “The Ardleigh cropmark complex”. Evidence of the archaeology here is for example provided in the book “The Archaeology of Ardleigh, Essex: Excavations 1955-1980<sup>30</sup>. An image from the book showing the cropmarks at the Scheduled Monument site and the area in question immediately to the north is provided in Figure 6.0.



**Figure 6.0: “The Ardleigh cropmark complex”**

*1994 rectified plot from: The Archaeology of Ardleigh, Essex: Excavations 1955-1980*

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<sup>30</sup> The Archaeology of Ardleigh, Essex: Excavations 1955-1980 by N.R. Brown East Anglian Archaeology Report No. 90, 1999 ISBN 1 85281 164 1

- 6.3. It is important to note that such images just show evidence of archaeology that is visible at the surface and there are limits to what is revealed by cropmarks. As discussed later in this report in relation to the proposed EACN substation site, even geophysical surveys have been shown to perform poorly in the immediate area. Excavation is likely to reveal a lot more.
- 6.4. Detailed information relating to this site was provided to NGET as part of the Ardleigh Parish Council official response to the 2022 and 2023 non-statutory consultations, but there were no resulting changes to the routing corridor.
- 6.5. This was followed-up by discussions at the 2024 statutory consultation public information events and a follow-up email sent on 19 May 2024 extending an invitation to National Grid and/or its historic environment consultants to visit Ardleigh to discuss information held locally as this would be invaluable in helping to fill the gaps in the records used by NGET. The requested confirmation of receipt on behalf of the NGET heritage team was received on 21 May 2024 but to date, 24 July 2024, no further response has been received.
- 6.6. NGET plans show a pylon (TB007), undergrounding and associated works such as haul roads located here. Most of this site also falls within the draft order limit. The construction works would therefore result in the destruction of important archaeology. The location of Areas A and B referenced in the book are shown in the modified version of NGET Figure A11.1 in Appendix D-2 (which can be compared with the original version in Appendix D-1). This shows the cropmarks that have been identified as being of archaeological interest.
- 6.7. Area B which is bounded to the north by Little Bromley Road has not been investigated yet. It is not included in the Scheduled Monument which is immediately south of the boundary, but clearly there is significant evidence of high value archaeology. The boundaries of the Scheduled Monument purely illustrate the extent of the archaeological investigation carried out at the time, hence the straight line on the northern boundary to coincide with a footpath. These settlements were not constrained by perfectly straight lines. In a similar manner, part of the western boundary is formed by the railway line which clearly wasn't a feature that existed at the time of the settlements.
- 6.8. It is considered highly likely that if properly investigated the Scheduled Monument would cover a significantly greater area, including land to the north of Little Bromley Road. Therefore, other areas of undergrounding and other proposed pylons such as TB005, TB006, TB008, TB009 and beyond are also likely to be significant.
- 6.9. On pages 184 of "The Archaeology of Ardleigh, Essex: Excavations 1955-1980" it states: "*Despite CAG's numerous ring-ditch excavations, at least as many are known to remain unexcavated. Given the density of burials recorded outside the ring-ditches; it seems reasonable to suppose that all the numerous investigations carried out at Ardleigh, have revealed only a fraction of the total.*

*Many, perhaps hundreds, more may remain within the main cemetery complex alone. Furthermore, despite the intensity of field investigation and the prolonged campaign of air photography, the sheer density of ring-ditches revealed in CEU's Area 7 excavation was largely unsuspected. It is unlikely that this phenomenon is confined to this one location within the cemetery complex.”*

6.10. It is interesting to note that a book review of “The Archaeology of Ardleigh, Essex: Excavations 1955-1980”, submitted in February 2004 by Dominic Barker of Southampton University stated: “*The maps produced from the aerial photograph plots are clear and will provide a firm basis for further work in the area*”<sup>31</sup>. This confirms the view that further investigation was envisaged and that even without the availability of current techniques there was very good evidence.

6.11. Overarching National Policy Statement for energy (EN-1)<sup>32</sup> makes provision for heritage assets that are not currently designated, as follows:

*“5.9.5 There are heritage assets that are not currently designated, but which have been demonstrated to be of equivalent significance to designated heritage assets of the highest significance. These are: ...those that have yet to be formally assessed by the Secretary of State, but which have potential to demonstrate equivalent significance to Scheduled Monuments...”*

**and**

*“5.9.6 Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments or Protected Wreck Sites should be considered subject to the policies for designated heritage assets”<sup>234</sup>.*

<sup>234</sup> *There will be archaeological interest in a heritage asset if it holds, or may potentially hold, evidence of past human activity worthy of expert investigation at some point.”*

6.12. 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).

6.13. It is also noted that whilst archaeological investigations could be undertaken after consent has been granted, the NPPF is very clear is stating in

<sup>31</sup> [https://www.ucl.ac.uk/prehistoric/reviews/04\\_02\\_brown.htm](https://www.ucl.ac.uk/prehistoric/reviews/04_02_brown.htm)

<sup>32</sup> <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

paragraph 211 “...*the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted*”.

## 7. Roman Roads

- 7.1. The NGET Norwich to Tilbury Statutory Consultation 2024 drawings provide an incomplete representation of the Roman Roads in Ardleigh, as the routes of three Roman Roads have so far been established in the Parish and only one is shown properly in the consultation drawings.
- 7.2. NGET Figure A11.1: Historic Environment Designated and Non-Designated Heritage Assets Page 14 of 25, shows Roman Road “3206” which the current A12 out of Colchester now closely follows on the western boundary of the Parish of Ardleigh.
- 7.3. The only Roman Road shown in NGET Figure A11.1: Historic Environment Designated and Non-Designated Heritage Assets Page 13 of 25 is “3033/3035”. This is shown to end abruptly to the east of the proposed EACN site. NGET Figure A11.1 is replicated in Appendix D-1 of this report. There is though evidence that this road continued westwards, passing through the centre of Ardleigh. A further Roman Road ran from Hythe Quay in Colchester to Mistley on the River Stour, resulting in the two roads converging at the proposed EACN site. These additional Roman Roads are shown in the modified image of NGET Figure A11.1 in Appendix D-2.
- 7.4. It should be noted that the Roman Road from Colchester to Mistley that is omitted from NGET Figure A11.1 is referenced in the separate EACN Substation Geophysical Survey Report<sup>33</sup>. This is shown in drawing “Illus 07” as Historic Environment Record “MEX9020”. However, the EACN Substation Geophysical Survey Report omits any reference to Roman Road “3033/3035”, which is partially represented in NGET Figure A11.1. Therefore, neither of the assessments show both Roman Roads, as they each omit a different one. This means therefore that the crossing of the Roman Roads at the proposed EACN site is not considered in either study. The crossing of the two Roman Roads at the proposed site significantly increases the probability that below ground heritage assets exist. The overall result is that a very incomplete picture of the archaeological potential has been presented in the NGET reports, despite the evidence being available.
- 7.5. Details of the archaeology reports, the LiDAR data and the aerial photography images collected in relation to the Roman Roads that cross Ardleigh are provided in the Ardleigh History and Heritage Survey Overview document and are also referenced in the survey spreadsheet.

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<sup>33</sup> PEIR Volume III - Part 3 of 4: Appendix 11.3 – EACN Substation Geophysical Survey Report

## 8. Other Non-Designated Assets/Local Historic Environment Records

- 8.1. Paragraph 209 of the NPPF states: *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*.
- 8.2. As shown in NGET Figure A11.1 in Appendix D-2, due to the incredibly rich heritage of the village, the proposed routes of the undergrounding and overhead lines encircling Ardleigh cut through an almost continuous series of Non-Designated assets around the medieval village centre. This therefore shows no regard for such assets when selecting the routing corridor.
- 8.3. Similar conclusions were drawn from the work carried out by Ardleigh residents for the Ardleigh History and Heritage Survey using “monument sites” located on the Heritage Gateway website. In the survey overview document, it was stated: *“It was notable how much of the route is across HER polygons and how many additional HER points are in close proximity to it”*.

## 9. EACN Substation Geophysical Survey Report

- 9.1. The EACN Substation Geophysical Survey Report<sup>34</sup> is presented as a separate appendix in the NGET Norwich to Tilbury project documents.
- 9.2. In the Archaeological Background section of the EACN Substation Geophysical Survey Report there is a discussion on information abstracted from the Essex Historic Environment Record (EHER) data in respect of the Geophysical Survey Area (GSA) applied to the proposed site. The report states:

*“...Numerous cropmarks are recorded within and surrounding the GSA. Covering much of the GSA, HER polygon (MEX9188) records linear cropmarks (probable field divisions) at right angles to the Roman road which links Mistley with Colchester (MEX9020), which is aligned north-east/south-west, across the south of the GSA, and which is identified as a double-ditched cropmark on air photographs.*

*Also recorded as part of the same asset, are two possible ring ditches located north-east and east of Bradley Hall respectively.*

*In close proximity to (but just outside) the GSA to the immediate north-west, cropmarks indicative of a ring ditch, pits and a length of probable undated road are recorded, in addition to other linear features (MEX8391).*

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<sup>34</sup> PEIR Volume III - Part 3 of 4: Appendix 11.3 – EACN Substation Geophysical Survey Report



*Other cropmarks interpreted as a double-ditched enclosure, trackways, and other linear features (MEX43488) are recorded to the immediate east of the GSA...*

It then goes on to discuss many other heritage assets in the vicinity of this site. Before concluding: “...**The GSA is clearly located within a landscape of high archaeological potential.**” (emphasis added)

- 9.3. The Project Summary of the EACN Substation Geophysical Survey Report also talks about “...*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.*”
- 9.4. 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.*”
- 9.5. The concluding paragraph is “*Based solely on the results of the geophysical survey, the archaeological potential of the GSA is assessed as low. However, due to the likely poor magnetic contrast on this site, the overall potential should be considered to be uncertain.*”
- 9.6. This final paragraph therefore greatly understates the previous assertion in the same report that “*The GSA is clearly located within a landscape of high archaeological potential.*”
- 9.7. Also, as discussed in Section 7 of this report, one of the two Roman Roads was omitted from the EACN Substation Geophysical Survey Report. As the two Roman Roads formed a cross-roads at the proposed EACN site this greatly increases the significance of this omission as the archaeological potential is substantially increased.
- 9.8. The previously referenced NGET Figure A11.1 also shows records of Roman Non-designated heritage assets around the proposed EACN site, particularly on the eastern side where the North Falls and Five Estuaries substations are proposed to be located. The proposed Tarchon substation is also expected to be located somewhere in that area. The cumulative harm from four proposed linked developments would be enormous.
- 9.9. Readily available desktop information on heritage assets should be enough alone to indicate at an early stage that this site is not suitable for the proposed developments.

## 10. Local Green Spaces

10.1. Paragraphs 105, 106 & 107 of the National Planning Policy Framework<sup>35</sup> (NPPF) state the following:

105. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

106. The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.

107. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

10.2. In line with the NPPF, the Ardleigh Neighbourhood Plan 2020 – 2033<sup>36</sup> states that Local Green Space designation should only be used where the green space is “...*Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife*”.

10.3. A total of 24 LGSs were initially nominated for consideration by the local community as part of the Ardleigh Neighbourhood Plan consultation. After further assessment stages a total of 10 LGSs were carried forward for nomination in the Neighbourhood Plan. These were then subject to review by the Neighbourhood Plan Examiner.

10.4. All the LGSs referenced in this document met the requirements of the National Planning Policy Framework, as determined by the Neighbourhood Plan Examiner. In the examination report, in relation to “Fishing Lake and Footpaths north of Colchester Road” [GS1], it was stated: “*I consider this modified LGS and all the other proposed LGSs are demonstrably important to the local community, all are capable of enduring beyond the Plan period, all meet the*

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<sup>35</sup> National Planning Policy Framework, December 2023

[https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf)

<sup>36</sup> Ardleigh Neighbourhood Plan 2020 - 2033

[https://www.tendringdc.gov.uk/sites/default/files/documents/planning/Planning\\_Policy/Ardleigh/Ardleigh%20Neighbourhood%20Plan.pdf](https://www.tendringdc.gov.uk/sites/default/files/documents/planning/Planning_Policy/Ardleigh/Ardleigh%20Neighbourhood%20Plan.pdf)

*criteria in paragraph 106 of the NPPF and their designation is consistent with the local planning of sustainable development and investment in sufficient homes, jobs and other essential services given other policies in the development plan and this Plan”<sup>37</sup>.*

- 10.5. This document just focusses on those Local Green Spaces where (a) there is an historical link and (b) they are either very near to, or coincide with, the proposed Norwich to Tilbury infrastructure. These are shown in Appendix E.
- 10.6. Please note that the numbering of the Local Green Spaces here represents the recent renumbering following examination of the Ardleigh Neighbourhood Plan and differs from that used in the Ardleigh History and Heritage Survey and the original version of the Ardleigh Neighbourhood Plan 2020 - 2033.

### GS1: “Fishing lake and footpaths north of Colchester Road”

- 10.7. The description for Local Green Space GS1 from the Ardleigh Neighbourhood Plan 2020 - 2033 states: *“Parts of the site support beautiful, far-reaching public views to be had both across the arable landscape and back towards the settlement edge. These views are genuinely representative of the Landscape Character Area and largely unchanged since historic times. The space is emblematic of the historic (and, in other places, eroded) abrupt spatial relationship between the medieval nuclear village of Ardleigh and the surrounding working countryside. It has been used for recreational walking by villagers for hundreds of years...”*

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<sup>37</sup> 24.075 b Examiner\_Report\_ArdleighNDP\_TDC\_Final.pdf



**Figure 10.1: “GS1: “Fishing lake and footpaths north of Colchester Road”**



**Figure 10.2: “GS1: “Fishing lake and footpaths north of Colchester Road”**

- 10.8. In the Norwich to Tilbury plans, an overhead line passes directly over the lake between pylons TB013 and TB014. The tranquillity referenced in the Arleigh Neighbourhood Plan would be severely harmed by the humming sound and wind noise from the overhead power lines. The mature trees and hedges around the lake would also be removed and the historic setting severely harmed.
- 10.9. Images taken from the screens of visualisations presented at the NGET statutory consultation public information events are provided in the following figures.
- 10.10. Figure 10.3 shows the dominance of pylon TB013. This is situated just 50m away from the fishing lake; a distance equivalent to its height.
- 10.11. Figure 10.4 shows the span of the cables over the fishing lake between pylons TB013 and TB014. For comparison the photograph in Figure 10.2 was taken from a similar vantage point.



**Figure 10.3: “GS1: “Fishing lake and footpaths north of Colchester Road”**

Pylon TB013 with the edge of the fishing lake in the left-hand corner



**Figure 10.4: “GS1: “Fishing lake and footpaths north of Colchester Road”**

Span of overhead line over lake between TB013 & TB014

*The viewpoint is similar to the photograph in Figure 10.2*

## GS5: “Car park land”

- 10.12. The description for Local Green Space GS5 from the Ardleigh Neighbourhood Plan 2020 – 2033 states: *“This space comprises a small section of public amenity land that sits adjacent to the village’s central car park. It consists of undulating grassed land containing various trees and a well-used pedestrian pathway. It is located within the Conservation Area, in close proximity and in view of the landmark, Grade II\* listed village church...It is also close to and overlooked by the nearby residential estate, providing a well-used informal play area for children living there. The land is considered to make a very valuable contribution towards the landscape qualities of the Conservation Area...”*
- 10.13. This area, like rest of the village centre, has a strong historical context due to previous occupation of the land in medieval and much earlier times. There is known to be a very fine example of an Iron Age ring ditch underneath the car park here, which was discovered during construction.



**Figure 10.5: GS5: “Car park land”**

## GS6: “Glebe Corner land”

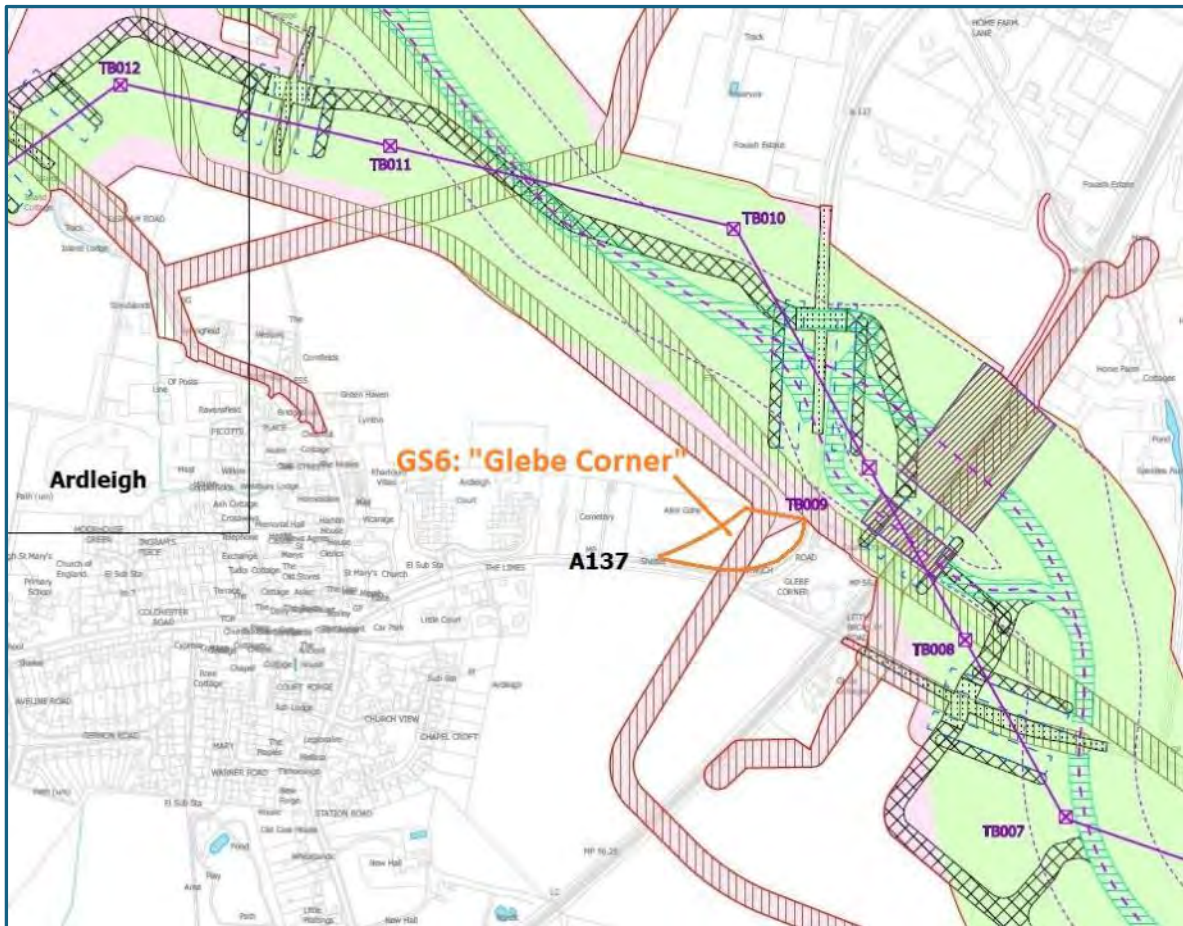
- 10.14. The description for Local Green Space GS6 from the Ardleigh Neighbourhood Plan 2020 – 2033 states: *“This space comprises former glebe land (historically attached to the village church) that now appears as rough grassland, bordered by dense and mature hedgerows of some quality. The space is considered to provide a very important landscape function, marking the unofficial “entrance” to Ardleigh from the east. Its partial treed enclosure clearly distinguishes it from the wider open landscape and serves to signpost the transition from large-scale arable countryside to small-scale rural settlement. In its current state, the site has clear biodiversity value and appears to support an abundance of butterflies and bees. It also assists to preserve the tranquillity and landscape qualities of the adjacent allotments and cemetery. Although it is no longer glebe land, it retains many of the undeveloped qualities that it would historically have held as glebe land and it continues to form part of the church’s heritage setting. Its retention provides an evocative reminder of the ecclesiastical origins of this part of the Parish.”*
- 10.15. The extremely close proximity of this area to the proposed infrastructure would be extremely harmful to all the qualities described here. Also, as it *“continues to form part of the church’s heritage setting”* this will further impact the setting of the Grade II\* listed St. Mary's Church, Ardleigh (1112060), which is discussed in Section 4 of this document under the Conservation Area heading.



**Figure 10.6: GS6: “Glebe Corner land”**



- 10.16. This area in combination with the adjacent allotments and cemetery completes the tract of formerly glebe land.
- 10.17. Despite National Grid recognising the existence of the Ardleigh Neighbourhood Plan this green space would be severely harmed by the plans.
- 10.18. As can be seen in Figure 10.7, a significant proportion of this land would be consumed by Statutory Undertaker Works.



**Figure 10.7: GS6: “Glebe Corner” highlighted on S.42 CONSULTATION PLAN SERIES SECTION C (SHEET 11 OF 16) AENC-NG-ENG-PLN-0004 Issue A**

- 10.19. The nearest 50m pylon (TB009) would be less than 90m away from this green space and the Zone for Permanent Assets 35m away.
- 10.20. Figure 10.8 is a screen shot taken from the 3D model used by NGET for visualisations at the statutory consultation public information events. This shows how the proposed overhead lines would dominate this green space.



**Figure 10.8: GS6: "Glebe Corner" Screenshot from NGET visualisation**

View from south of the A137 opposite wooden bus shelter

- 10.21. It should also be noted that this area of land is actively being pursued for an extension to the neighbouring cemetery, as this is nearing capacity. The cemetery environment would be severely compromised by the close proximity of towering pylons.

## 11. Safeguarded Open Spaces

- 11.1. The Ardleigh Neighbourhood Plan 2020 - 2033 states that “*Safeguarded Open Spaces comprise of local green and open spaces (including parks, churchyards, allotments and playing pitches) which make a considerable contribution to the quality of life of residents and visitors and which promote sustainable communities.*”
- 11.2. For Ardleigh these are the Recreation Ground, Millennium Green, churchyard, cemetery and the allotments, as shown in Appendix E. This map also shows the approximate distances to the proposed pylons. All these spaces provide considerable value to the local community. Of these the Millennium Green, churchyard and cemetery have historical connections as outlined here.
- 11.3. The Millennium Green was created in 1999. Aspects of Ardleigh history are represented here via a "human sundial". There is also a large “Wartime Ardleigh” plaque, which highlights different aspects of village life in Ardleigh during WW1 and WW2. A beacon was installed on the green in 2002 and this is used to commemorate special events. On many occasions it has been used as part of National Beacon Lighting. This included the recent lighting of the beacon on the 80th anniversary of D-Day on 6 June 2024. The proximity to the proposed pylons would be very detrimental to the setting of the Millennium Green.
- 11.4. The cemetery and garden of rest would be overlooked by 3 pylons located at distances of between 250m and 400m away (TB009 to TB011), which would therefore severely impact those sitting and reflecting in these spaces.
- 11.5. Despite National Grid acknowledging the existence of the Ardleigh Neighbourhood Plan there is no evidence that this been considered in relation to either the Local Green Spaces referenced in Section 10 of this report or the Safeguarded Open Spaces referenced here, even though key parameters such as draft Order Limits have now being defined. There is for example no reference to these valued spaces in documents such as PEIR Non-Technical Summary “*Figure 1 - Non-Technical Summary - Environmental Constraints Plan, Page 13 of 25*”.

In section 4.13.22 of the 2023 Non-Statutory Consultation Feedback Report, “*Concern about the impact of the Project on the Ardleigh Neighbourhood Plan*” is referenced. National Grid’s response is stated as: “*The relevant neighbourhood plans along the proposed route (including those produced by Ardleigh Parish Council) have all been identified along with other local and national planning policy. The Planning Statement, which will be submitted with the application for development consent, will set out how the Project has had regard to relevant planning policies, including those of emerging and adopted Neighbourhood Plans*”. **This is too late in the process to address such issues as they need to be considered in the initial routeing, as does the high value below ground archaeology discussed in earlier sections.**

## 12. Other Heritage Assets

This category was created to capture heritage assets that were not covered by the other categories.

### Public Rights of Way

The paths are considered a heritage asset as they are likely to date back to the early history of the village. Many of these follow a roughly radial route from the village centre and the church. The proposed arc of pylons around the village centre would therefore intersect many of these. Further detail is provided in a separate document within this submission.

### Ardleigh St Mary's Primary School

The school was opened in 1865. It is located in the historic village centre and has played a key part in the history of Ardleigh. It featured in the wartime history of the village. In WW1 it was used to billet troops, including the mounted West Somerset Yeomanry. In WW2 children evacuated from London attended the school.

In the section “3.8 Setting of the Conservation Area” of the “Ardleigh Conservation Area, Character Appraisal and Management Plan<sup>38</sup>” the contribution provided by the school is recognised, despite being located outside of the Conservation Area:

*“To the west of the Conservation Area is Ardleigh St Mary’s Primary School, constructed in 1865 along with the attached schoolhouse. This building makes an important contribution to the setting of the Conservation Area as it was constructed to serve the village of Ardleigh. It contributes to an understanding of Ardleigh’s mid-nineteenth century development.”*

Due to the arc of the pylon corridor, three pylons TB011, TB012 and TB013 would be close to the school, with distances of approximately 510m, 460m and 320m respectively to the school playing field.

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<sup>38</sup> Ardleigh Conservation Area, Character Appraisal and Management Plan, Client: Tendring District Council Date: June 2023, Place Services  
<https://tdcdemocracy.tendringdc.gov.uk/documents/s60772/A1%20Appendix%201%20Ardleigh%20CA%20AMP.pdf>

## 13. Historic Environment – Scoping

- 13.1. In the Conservation Area section of this report, it was noted that in the PEIR only 2 of the 17 listed buildings in the Ardleigh Conservation Area were considered to be in scope.
- 13.2. Subsequently the huge scale of the number of heritage assets being scoped out from further assessment became apparent. This and other issues relating to the methodology employed are covered in a separate report as part of the ESNP campaign group submission<sup>39</sup>.
- 13.3. The fact that it has been necessary to scope-out such a huge number of heritage assets from the assessment to make the work more manageable emphasises again the huge harm that would be caused by the scheme and can only further confirm the inappropriate choice of the proposed route for the infrastructure.
- 13.4. A huge omission is also not sufficiently considering the contribution of Non-Designated heritage assets and the complete exclusion from the PEIR of very significant Non-Designated heritage assets in the Parish.

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<sup>39</sup> Objection Statement, OBJECTION TO 'NATIONAL GRID ROUTE BETWEEN NORWICH AND TILBURY', Project Ref: FL12553, Written By: Virginia Gillece of Fuller Long HEA, Date: June 2024

## 14. Conclusions

- 14.1. This report highlights the rich heritage and archaeology at risk of severe and irreversible harm in the Parish of Ardleigh because of the proposed Norwich to Tilbury infrastructure development outlined at the 2024 statutory consultation.
- 14.2. The harms would result from close proximity of the proposed infrastructure to high value heritage assets and from excavation in areas where there is known to be high archaeological potential due to below ground archaeology.
- 14.3. Any mitigation would be extremely limited in its effect. This is acknowledged in the documentation supplied by National Grid where, in relation to pylons, in many instances for “*Operational Effects*” it is stated that “*The Project would introduce tall infrastructure within the setting of the asset*” and for “*Mitigation*” the response “*There is no suitable mitigation to reduce this effect*”.
- 14.4. The heritage assets discussed include 71 listed buildings, a Conservation Area, a Scheduled Monument and a vast array of Non-Designated Assets, including the routes of Roman Roads.
- 14.5. This report highlights for example where the proposals show pylons and underground cables located in an area adjacent to the Scheduled Monument site where there are known to be below ground Non-Designated heritage assets. This was highlighted to National Grid at previous consultations. As outlined in this report, any development of the site would be in breach of the Overarching National Policy Statement for energy (EN-1).
- 14.6. It is discussed how many of the listed buildings have been scoped out of the work and how, for the limited number of heritage assets covered, the assessment is opaque and flawed. For example, the Conservation Area which would be severely harmed by the development is rated as “*high value*” in the baseline assessment, but this then became “*medium value*” when the impact was assessed. The Grade II\* listed St. Mary's Church, Ardleigh (1112060), is assessed as being of “*high value*” in the PEIR but significance of the negative impact of being surrounded by tall infrastructure is severely understated, noting for example its prominence as a “*Landmark Building*”<sup>40</sup>.
- 14.7. This report discusses just a few of the 71 listed buildings along with the Conservation Area, the Scheduled Monument and some of the Non-Designated assets. More detailed information on all the heritage assets including harm

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<sup>40</sup> Ardleigh Conservation Area, Character Appraisal and Management Plan, Client: Tendring District Council Date: June 2023, Place Services  
[https://tdcdemocracy.tendringdc.gov.uk/documents/s60772/A1%20Appendix%201%20Ardleigh%20CA AMP.pdf](https://tdcdemocracy.tendringdc.gov.uk/documents/s60772/A1%20Appendix%201%20Ardleigh%20CA%20AMP.pdf)

ratings is provided in two supplementary documents: the **Ardleigh History and Heritage Survey Spreadsheet**<sup>41</sup> and the **Ardleigh History and Heritage Survey Overview**<sup>42</sup>. These documents were the output from a project undertaken by a group of Ardleigh residents.

14.8. Further details relating to some of the heritage assets are provided in the **Essex Suffolk Norfolk Pylons Action Group History & Heritage Survey**. This survey collated details submitted by individuals relating to heritage assets for the whole route of the infrastructure, and forms part of the submission from ESNP.

14.9. Due to the high concentration of heritage assets in the path of the proposed infrastructure, the unsuitability of the proposed corridor around the Parish of Ardleigh and the location of the proposed EACN substation is clear, based on harm to high value heritage assets and due to the high archaeological potential in key areas.

14.10. The harm would be increased substantially further by the cumulative impact of the linked developments of the North Falls Windfarm substation, the Five Estuaries Windfarm substation and the Tarchon Interconnector substation, as all of these are currently proposed to be located adjacent to the EACN.

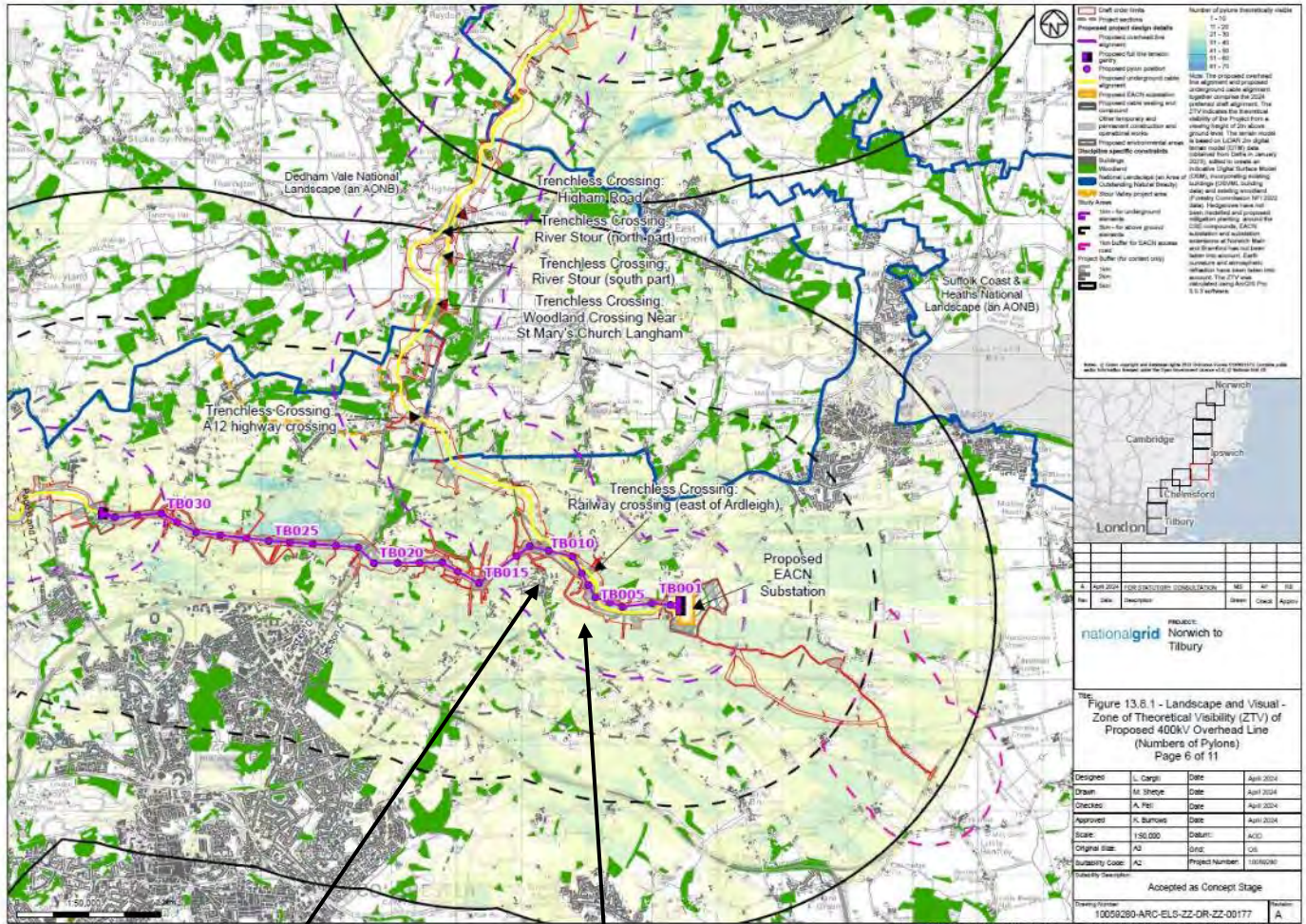
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<sup>41</sup> History and Heritage - Ardleigh\_V16.xlsx

<sup>42</sup> History and Heritage Survey - Ardleigh - Overview.pdf

# Appendix A-1: Landscape and Visual – ZTV – Numbers of Pylons

NGET Figure 13.8.1 annotated to show locations of Ardleigh Village Centre, Conservation Area and Scheduled Monument (1002146)



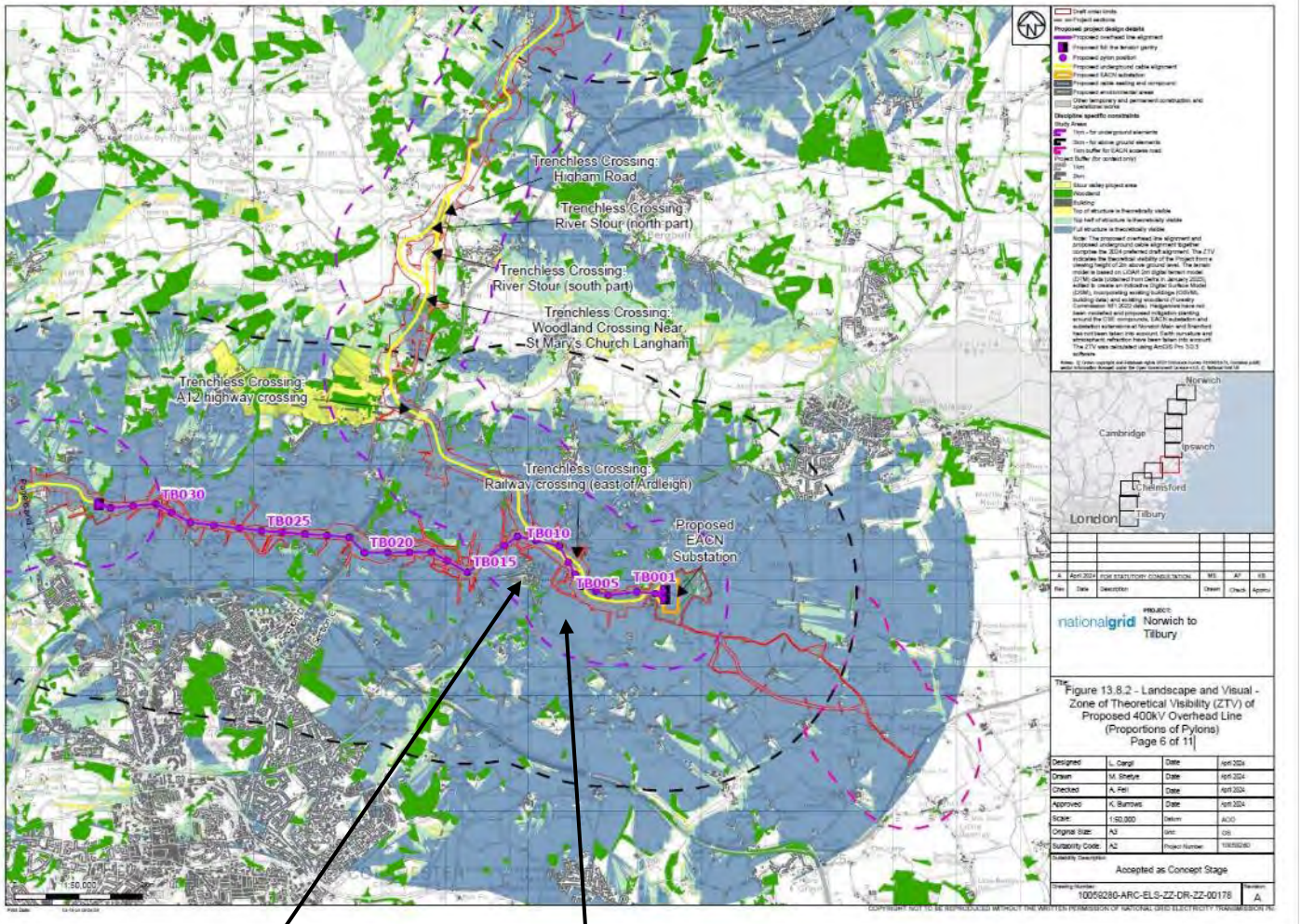
Ardleigh Village Centre & Conservation Area

Scheduled Monument (1002146)



## Appendix A-2: Landscape and Visual – ZTV – Proportions of Pylons

NGET Figure 13.8.2 annotated to show locations of Ardleigh Village Centre, Conservation Area and Scheduled Monument (1002146)

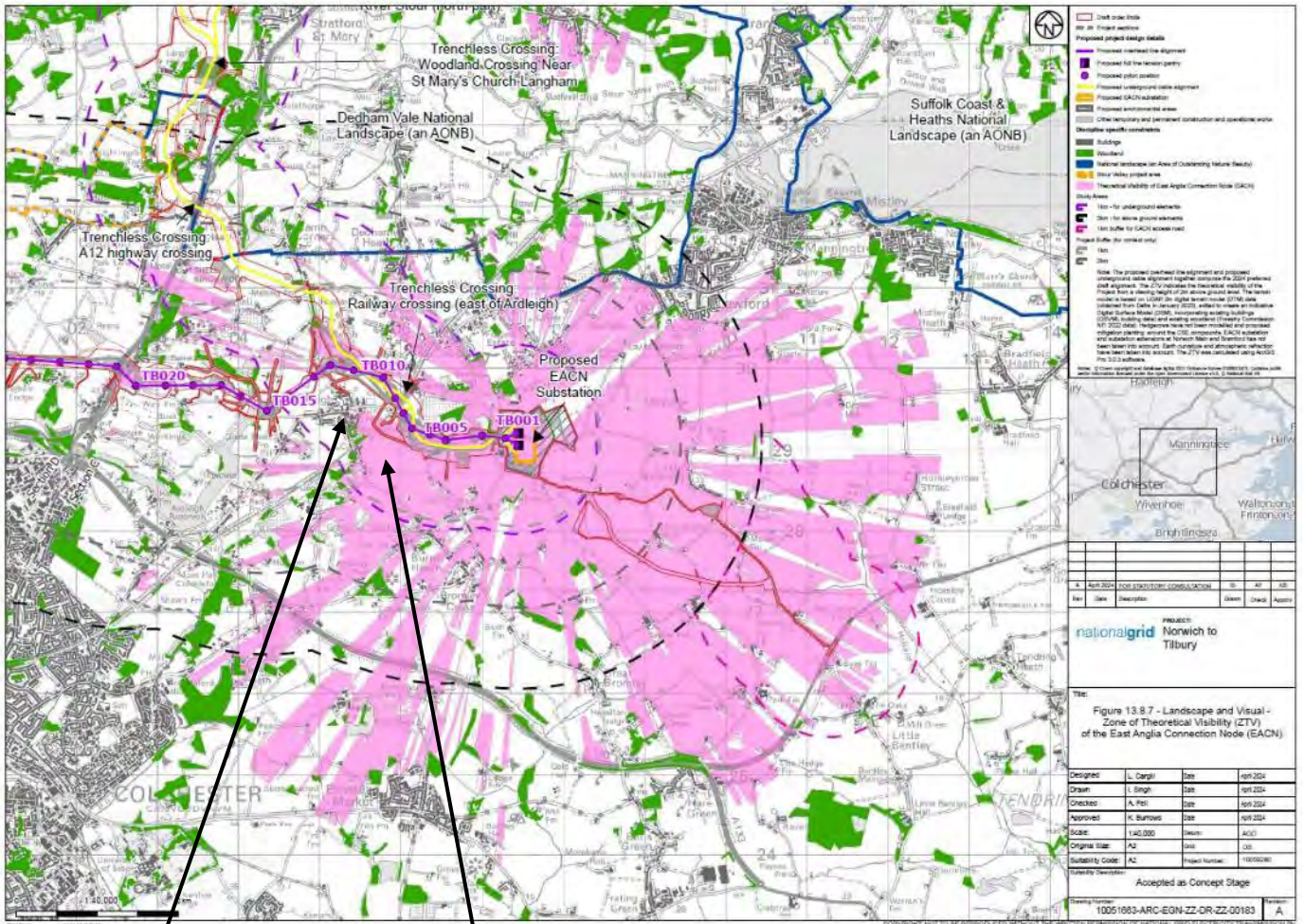


Ardleigh Village Centre & Conservation Area

Scheduled Monument (1002146)

## Appendix A-3: Landscape and Visual – ZTV of the EACN

NGET Figure 13.8.7 annotated to show locations of Ardleigh Village Centre, Conservation Area and Scheduled Monument (1002146)



Ardleigh Village Centre  
& Conservation Area

Scheduled Monument  
(1002146)

Appendix B-1: Views From the Tower of St Mary's Church (1/2)



Appendix B-2: Views From the Tower of St Mary's Church (2/2)



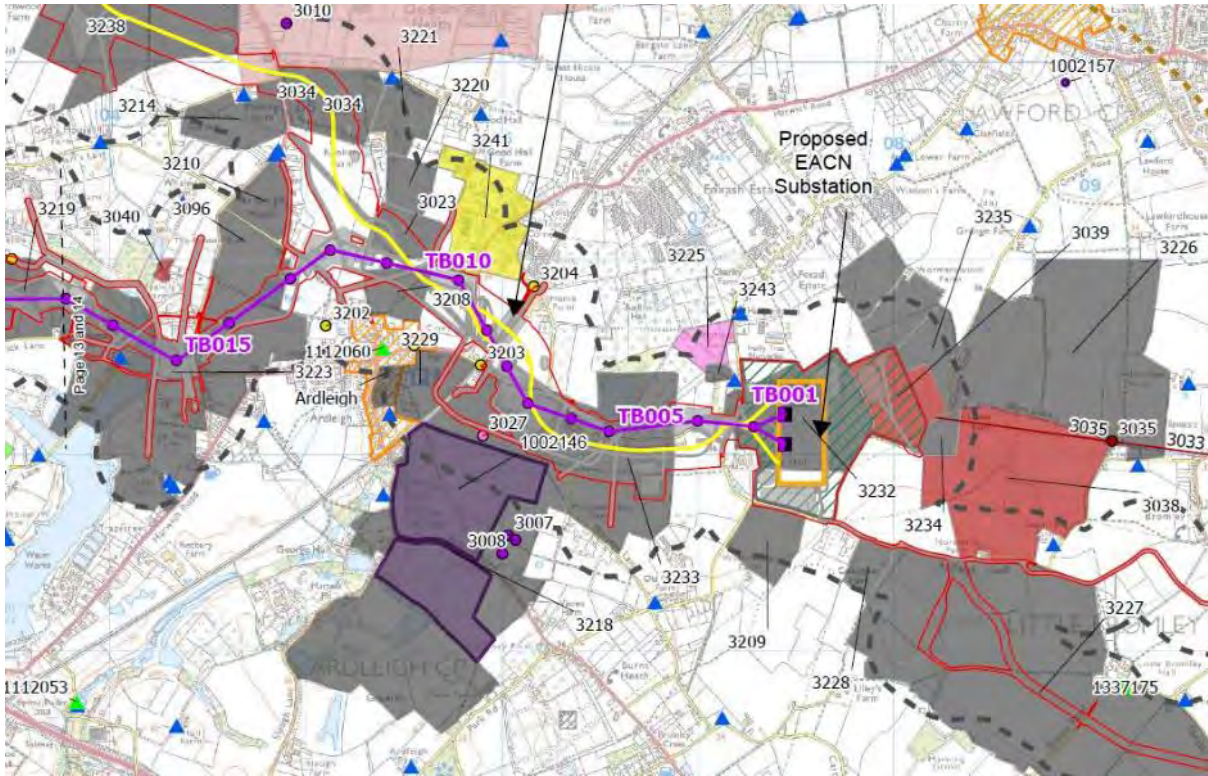
## Appendix C: Images From a Drone Video

The top image is in the direction of Ardleigh Reservoir and the lower image is towards Ardleigh village centre and St Mary's Church.



## Appendix D-1: Historic Environment Designated and Non-Designated Heritage Assets – Original Map

**Original image of Figure A11.1 from: NGET 2024 Norwich to Tilbury Statutory Consultation, Preliminary Environmental Information Report, Volume III – Technical Appendices – 3 of 4 April 2024. The Modified Map is provided on the next page.**



**NGET Figure A11.1:** Historic Environment Designated and Non-Designated Heritage Assets  
Page 13 of 25: Drawing No. 10059280-ARC-ELS-ZZ-DR-ZZ-00188 Rev. A

### NGET Key

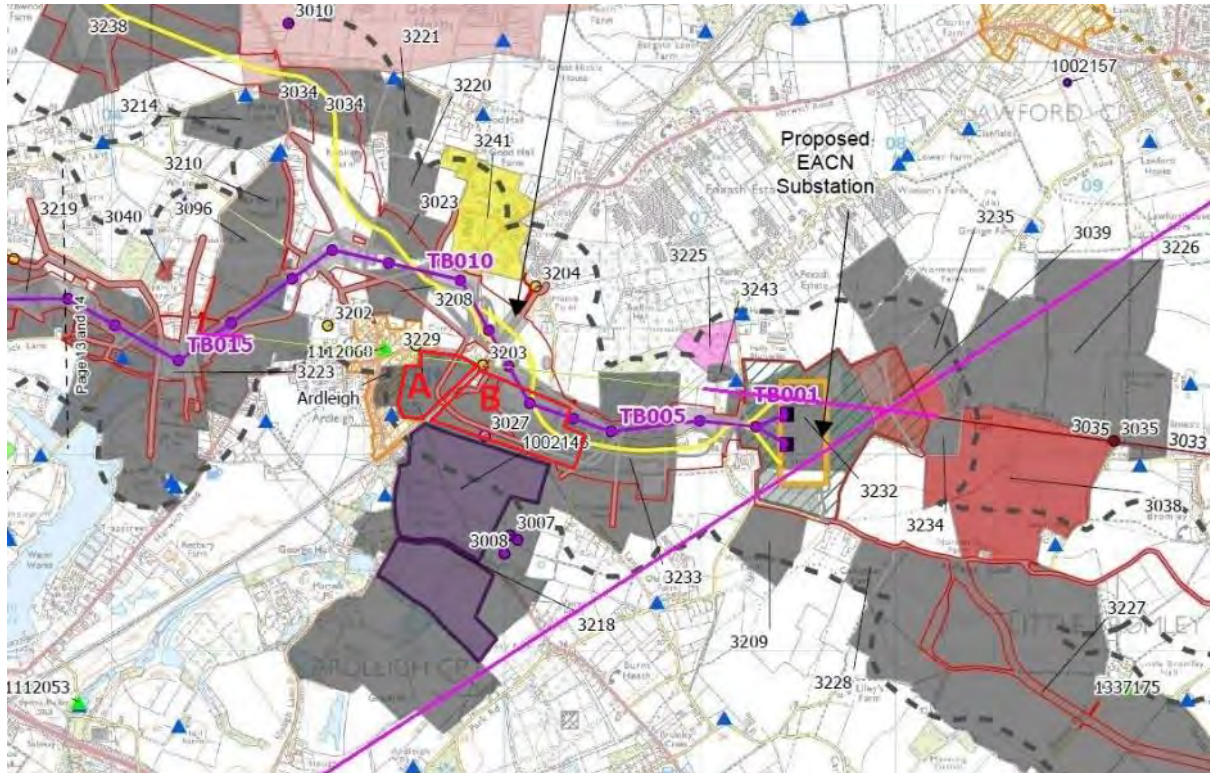
It should be noted that there are 17 listed buildings in the Conservation Area (16 Grade II and 1 Grade II\*) and therefore considerably more than shown on this plan.

Similarly, the plan “Norwich to Tilbury - Environmental Constraints - Section C.pdf” shows just 2 of the 17 listed buildings in the Conservation Area (National Grid Drawing Reference: AENC-NG-ENG-PLN-0012, SHEET 11 OF 16, Issue A, Date: APRIL 2024).

<ul style="list-style-type: none"> <li><span style="border-bottom: 1px dashed black; width: 20px; display: inline-block;"></span> Project sections</li> <li><span style="border: 1px solid red; width: 20px; height: 10px; display: inline-block;"></span> Draft order limits</li> <li><b>Proposed project design details</b></li> <li><span style="border-bottom: 2px solid purple; width: 20px; display: inline-block;"></span> Proposed overhead line alignment</li> <li><span style="border-bottom: 2px solid blue; width: 20px; display: inline-block;"></span> Proposed full line tension gantry</li> <li><span style="border: 1px solid purple; width: 10px; height: 10px; display: inline-block;"></span> Proposed pylon position</li> <li><span style="border-bottom: 2px solid yellow; width: 20px; display: inline-block;"></span> Proposed underground cable alignment</li> <li><span style="border: 1px solid orange; width: 20px; height: 10px; display: inline-block;"></span> Proposed EACN substation</li> <li><span style="background-color: lightgrey; width: 20px; height: 10px; display: inline-block;"></span> Other temporary and permanent construction and operational works</li> <li><span style="background-color: lightgrey; width: 20px; height: 10px; display: inline-block;"></span> Proposed environmental areas</li> <li><b>Discipline specific constraints</b></li> <li><span style="border: 1px solid black; width: 10px; height: 10px; display: inline-block;"></span> 250m Study Area</li> <li><span style="border: 1px solid black; width: 20px; height: 10px; display: inline-block;"></span> 2km Study Area</li> <li><span style="border: 1px solid black; width: 30px; height: 10px; display: inline-block;"></span> 3km Study Area</li> <li><b>Designated assets</b></li> <li><b>Listed buildings</b></li> <li><span style="color: red;">▲</span> I</li> <li><span style="color: green;">▲</span> II*</li> <li><span style="color: blue;">▲</span> II</li> <li><span style="border: 1px solid purple; width: 10px; height: 10px; display: inline-block;"></span> Scheduled Monuments</li> </ul>	<ul style="list-style-type: none"> <li><span style="border: 1px solid orange; width: 20px; height: 10px; display: inline-block;"></span> Conservation Areas</li> <li><b>Non-designated assets</b></li> <li><span style="color: purple;">●</span> Prehistoric</li> <li><span style="color: blue;">●</span> Neolithic</li> <li><span style="color: green;">●</span> Iron Age to Roman</li> <li><span style="color: red;">●</span> Roman</li> <li><span style="color: yellow;">●</span> Medieval</li> <li><span style="color: orange;">●</span> Modern</li> <li><span style="color: brown;">●</span> Post-Medieval</li> <li><span style="color: pink;">●</span> Prehistoric</li> <li><span style="color: grey;">●</span> Iron Age</li> <li><span style="color: lightgreen;">●</span> Iron Age to Roman</li> <li><span style="color: lightred;">●</span> Roman</li> <li><span style="color: lightgrey;">●</span> Post Medieval</li> <li><span style="color: lightyellow;">●</span> Modern</li> <li><span style="color: grey;">●</span> Undated</li> <li><span style="color: grey;">■</span> Grade I and II* listed buildings, scheduled monuments and registered parks and gardens are labelled with their National Heritage List Entry number.</li> </ul> <p>Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the 2024 preferred draft alignment.</p>
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## Appendix D-2: Historic Environment Designated and Non-Designated Heritage Assets – Modified Map

**NGET Figure A11.1 modified to show Areas A & B, as identified in EAA Report 90 and the additional Roman Roads.**



Key for additions to: NGET Figure A11.1: Historic Environment Designated and Non-Designated Heritage Assets (Page 13 of 25)

- A Areas A & B, as identified in EAA Report 90
- Additional known Roman Roads
- Green line is projected line of Roman Roads

## Appendix E: Location of the Protected Green Spaces and the Neighbourhood Plan Local Green Spaces

Approximate distances to the proposed infrastructure from the Protected Green Spaces and the Neighbourhood Plan Local Green Spaces that are referred to in this document.

