



Ardleigh Parish Council response to National Grid's Norwich to Tilbury consultation Summer 2023

1. Introduction

- 1.1. ***There is no need for this destructive project which would cause devastation in our parish. We want an integrated offshore grid in the North Sea which has been shown by National Grid ESO to save £2bn and to reduce overall infrastructure by 50%. Further, serious, consideration of a strategic and joined up solution is required. We support and endorse the submission of the Essex Suffolk Norfolk Pylons Action Group.***
- 1.2. Following the 2022 consultation and the further information provided in 2023 our residents remain desperately concerned about the profound impact on our Parish should these proposals go ahead. Many of the issues raised in 2022 have not been addressed by National Grid (NG). Where appropriate, we have reproduced and updated those comments in this submission.
- 1.3. The strong view of the Council, and of the residents we have spoken to, is that the proposals are unacceptable and bring significantly more harm than benefit, both for Ardleigh and its surrounding area and for the region, and country, as a whole.
- 1.4. Given the plans for 50-metre high pylons, underground cabling the location of the East Anglian Connection Node (EACN) an eighteen hectare substation, within our Parish, it remains clear that Ardleigh would be uniquely and profoundly affected by these proposals, should they go ahead. There would be cables crossing our Parish in two directions approaching the proposed substation. In effect, three sides of the historic centre of Ardleigh village, would feel 'caged'. These lines/ cabling would be close to and very visible from the Ardleigh Conservation Area, many homes and our village primary school and pre-school. The lines/ cables would cut through valued prime farmland and landscape and any pylons (21 are proposed within Ardleigh) would visible from nearly all parts of our beautiful, rural and relatively 'flat' parish adjoining the Dedham Vale Area of Outstanding Natural Beauty.
- 1.5. We understand that NG has offered and contracted connections to EACN to North Falls, Five Estuaries and Tarchon. We question how connections can be contracted at this time as the proposals are far from being approved. However, both North Falls and Five Estuaries have carried out consultations and have made our residents aware of their plans. We have no visibility of Tarchon's plans at this time. Both North Falls and Five Estuaries are planning 8+ hectare substations and significant underground cabling within or at the borders of our parish. The effects from their construction and operational plans would be massive. Discussions with NG staff at your drop in events indicate that we can expect similar plans from Tarchon, and that additionally Tarchon will need to construct a converter station (HVDC to AC) whose location would need to be decided.
- 1.6. The cumulative effect of NG proposals together with those planned by other providers is devastating and is causing many residents anxiety and stress. This stress can only be further increased when Tarchon consult on their proposals. These proposals, if they go ahead, will be a permanent disfigurement of the East Anglian countryside, remove valuable arable land from production necessary for food-security, generate significant noise, affect residents and communities' amenities and drive down property values for a large swathe of the affected area. Our current precious rural landscape will be industrialised by massive substations, 50-metre high pylons and wide stretches of farmland permanently affected by underground cabling.
- 1.7. The NG proposals need a complete rework. National Grid is consulting on a single solution only. When challenged as to why other approaches are not under review NG representatives repeatedly focus on cost (to

National Grid and potential bill payers) as the key metric (as well as regulatory restriction see below). There seems to be no regard for the long-term implications or environmental, ecological and sociological impact of such a scheme nor of the wider (or even total) costs of the project. The quality of life for residents and impact on rural areas and our residents needs to be a prime consideration. Furthermore, we have not seen any evidence that consumers would not be prepared to pay a little more through their energy bills for an offshore solution. Have they even been asked?

- 1.8. Ardleigh Parish Council endorses the opposition to the proposals of the Essex Suffolk Norfolk Pylons campaign group, the strong opposition of Tendring District Council (TDC) including *'We acknowledge the proposed changes in this second round of non-statutory consultation, namely the undergrounding of cables all the way to the substation in Lawford, East Anglian Connection Node (EACN). Despite this alteration there would still be a significant impact to our residents in Ardleigh'* and of our MP, Sir Bernard Jenkin who has played a key role.
 - 1.9. The legal advice obtained from Charles Banner KC by the Essex Suffolk Norfolk Pylons campaign group, can only strengthen our resolve to continue to object to the proposals since there is significant opportunity for legal challenge. It is notable that national press coverage has been increasing in recent weeks including a recent article in the Financial Times and Business Telegraph which focussed on Ardleigh. Our MP was quoted in that article, as follows *"Prominent local Conservative MPs have taken up the cause. On a visit to Ardleigh, Sir Bernard Jenkin, the local Conservative MP, told the Financial Times that without change the project would get bogged down in legal action and argued undersea cables were the solution. "We're all in favour of offshore wind [but] this is going to be mired in judicial review . . . they ought to short circuit and go back to the drawing board."* <https://www.ft.com/content/f216dcbf-6e95-4e01-ab89-b5f6f331c8d2>
 - 1.10. We endorse the opposition from neighbouring parishes including Little Bromley Parish Council and Fordham Parish Council including damage caused by haulage roads and undergrounding which equally apply to Ardleigh with many lanes with mature hedgerows being crossed and at least five areas of woodlands being threatened. In particular it is difficult to imagine how Little Bromley Road from the proposed NG substation to the A137 would not be damaged and unusable for years.
 - 1.11. We support the calls for a strategic off-shore solution and continue to call on all parties (including off-shore windfarm providers, battery storage providers etc, local authorities and the government) to work together and to update the regulatory framework, to enable a genuinely strategic and collaborative approach to the issue of energy supply and to ensure that any future consultations provide a full range of considered and costed options. Our experience of liaison with National Grid and other providers is that there seems little appetite for joined up strategic and collaborative working and we feel we are being 'fobbed off' in this regard. We support the work of our MP, Sir Bernard Jenkin and the OFFSET group of MPs in seeking a strategic offshore grid.
 - 1.10. Failing this, we believe that an alternative route should be seriously considered. It is not clear why existing pylon routes broadly taking the same route cannot be upgraded, or that cables could not follow existing infrastructure such as the A12. It is our understanding that there is an existing pylon route from Bradwell to London that is not currently used and could be upgraded without the cost disruption and opposition that a new route would create. When approached about this at one of the webinars National Grid representatives, again, sidestepped the issue and told us that there would be barriers (this time in the form of planning requirements and 'international designations'). We are bewildered that bringing three or more sets of cables on shore in Tendring is not seen to be a problem, yet moving a few miles south to Bradwell is considered impossible. Why?
 - 1.11. An alternative site should also be sought for the sub-station(s) and options away from the AONB (which is also protected and valued) presented for full consultation. As previously stated, the cumulative impact of the full range of infrastructure on our communities needs to be taken into account.
- 2. Consultation with our residents and flaws in the consultation.**
- 2.10. We were intrigued to see a second non-statutory consultation, which we felt recognised the flaws of the initial consultation which we considered to be in breach of the Gunning Principles. However, we continue to have concerns about the latest consultation, including the lack of in-person consultation options for Ardleigh

residents and indeed for anyone working office hours or commuting for whom there were no suitable in-person events at all. The timing of the consultation over the summer is also a cause for concern with fewer opportunities (for us and National Grid) to engage with residents through regular groups or newsletters than at other times of year.

2.11. We wrote on 28 June to 'express our concerns

- *That there is no event in Ardleigh, despite this being flagged in our response to the initial non-statutory consultation in June last year- we asked why a provisional booking did not go ahead. Our Parish is the site of the proposed substation and will have a double run of cables so stands to be uniquely and profoundly affected. We would be happy to assist with facilitating a booking of Ardleigh Village Hall- including liaising with regular hirers to try to free up a slot if this would be helpful.*
- *That the only Saturday event takes place in Lawford on the same day as the Tendring Show, which will mean that many residents are either committed to attending the show, or will be unable, or reluctant, to attend the public information event due to transport and traffic concerns. At the moment Ardleigh Village Hall is available all day on Sat 8 July if you were minded to move the location. According to google maps the venues are 3.2 miles apart a six-minute journey by car – a very direct route along the A137.'*

2.12. National Grid replied on 3 August 'We hope this email will help clarify the points raised. We have tried to make sure the consultation is accessible for local communities. As you will understand, this has also meant the need to balance a number of different factors in pulling together the non-statutory consultation.

When booking the consultation venues, we sought to ensure at least one venue in each local authority area.

With limited availability of suitable venues for the various dates required, the 8th July was the only availability we were able to work with, in Lawford, for the Tendring event in the consultation period. Although the Tendring show was scheduled on the same day, we hoped that people in the local area who attended the show could also come along to the consultation event and provide feedback. We also wanted to ensure minimal disruption was caused to pre-booked clubs and groups at the venues we have booked, as you note.'

2.13. Unfortunately, this response utterly fails to address the point that our Village Hall was available and suitable. We continue to call for direct opportunities for Ardleigh residents to be consulted within our parish. We are certain that residents were put off or prevented from attending the Lawford event because of the clash with the Tendring Show. Next time please come to Ardleigh, we will actively facilitate this if you involve us.

2.14. When residents and members of our Parish Council attended the Langham consultation event, they fed back to us that the representatives of National Grid were not actively listening or taking notes of any of the comments made, rather it felt like a one-way process whereby National Grid sought to explain and justify its position.

2.15. We consider that the first consultation, held in the summer of 2022 breached all four of the Gunning Principles which are enshrined in Law:

- only a single option was presented with no alternatives;
- the information provided in support of the developed route including in the Corridor and Preliminary Routeing and Siting Study Report ("CPRSS") was insufficient and contained manifest errors and contradiction between costs for identical routes, the Least Worst Regret ("LWR") methodology used has been shown to be flawed in an independent study commissioned by Ofgem. Many of the routeing decisions in the CPRSS were unsubstantiated and bias was evident in some of the numbers and comparisons presented. The CPRSS could not be used as a basis for a reasonable decision;
- Insufficient time was given to form a reasonable conclusion: the consultation ended shortly before a new Network Options Assessment due to be published by National Grid, which National Grid themselves say might have a major impact on the need; Consultation for Sea Link and the offshore

transmission network review was also expected shortly. It was premature to consult on a land-based route ahead of publication.

- 2.16. The present consultation does nothing to correct these errors, and indeed compounds the previous mistakes and worsens the situation: Rather than presenting alternatives, National Grid is now presenting a single very detailed route including positions of individual pylons. There was no stage at which we have been given the opportunity to make an informed choice in respect of alternative routes. Residents are reluctant to express an opinion about the relative merits of each particular pylon's location when the broader issue of 'why not offshore' has not been addressed. There is a fear that expressing a preference may legitimise the proposals.
- 2.17. There is still considerable community anxiety at the prospect of large-scale and intrusive physical onshore infrastructure in the form of pylons and substations in sensitive locations close to homes, with associated concerns about health (mental and physical health such as reports of childhood cancer near pylons) and land values and house prices. We consider that this could undermine public support for offshore wind and other means of generating clean and green energy which in turn could be damaging to the government's ambitions around zero carbon and the fight against climate change.
- 2.18. Our residents and Parish Council has found the discussion about community benefits and consultation particularly troubling. There is no way that you can compensate for surrounding a medieval village in 50-metre high pylons. If compensation was offered for loss of amenity and house values, it would have to be so high that it would make the whole project prohibitive. Farmers don't want compensation for the damage and loss of land, they want to pass on this land and preserve it for future generations.

3. Substations within Tendring including EACN

- 3.1. We are extremely concerned about the potential land-take and height of a new substation at the borders of Ardleigh and Little Bromley. This is a rural area with poor road access, via narrow (generally single-track) country lanes which will be badly affected during the construction process to accommodate the huge vehicles required. These concerns are magnified by the fact that potentially three, or more, additional customer substations might also be located alongside. Since the initial consultation, planning permission has been granted for a battery storage facility in an adjacent field. The area proposed is flat, quiet and rural, with narrow lanes bordered by hedges, which are used by walkers and horse-riders and with very little light pollution. Those who living in the immediate area, or use it for leisure, would be impacted for ever, not just during construction. We continue to question the decision to site substations in such a location rather than closer to main roads, on a brownfield site, and/or nearer to the onshore cable entry points from the offshore generators.
- 3.2. There is still insufficient information as to the impact of the proposed new East Anglian Connection Node (EACN) site. The size of the proposed substation is enormous at 45 hectares and will take years to build with massive noise and disruption to traffic as well as dust and mud. The proposed site has several properties on its boundaries, and nearby, including Listed Buildings. It would dwarf the existing substation (which incidentally is well camouflaged) and take out many fields used for crops and grazing hence impacting on the agricultural output and viability of the area and contribution to the food supply chain.
- 3.3. There is no proper explanation as to why this site has been chosen. We assume that the existence of the existing small substation close to the site was a factor, and the relatively sparse population in the area. We were told at 2022 briefings that NG wanted a site with additional potential for expansion in the future. We are braced for not only the 45 hectares needed by NG and the 15 hectares with permission for battery storage, but at least two further 25 hectare substations for the two off-shore windfarms and further solar or other battery storage provision. We do not consider that the site chosen is suitable for the purpose and it is obvious from National Grid's own supporting documents that the difficulties in threading Pylons and underground cables through Ardleigh would break most of the Holbrook rules.
- 3.4. We oppose the route selected in because the proposed location of the substation means that the direct path of the pylons and cabling must be diverted to go in and out of the substation creating a line of pylons and another of underground cables and then encircling Ardleigh village to re-join the North (Norwich) /South (Tilbury) route.

- 3.5. The disruption during the construction phases would be enormous. Haul roads of high specification would have to be built to manage the construction traffic. Once completed the haul roads would be removed and the local road network then used for ongoing maintenance and there would be significant noise and light pollution affecting local residents (not to mention wildlife including bats). The existing single-track lanes are simply not suitable for any HGVs. Emergency vehicles such as fire engines could well struggle to reach the site- a particular concern where battery storage is included. If the existing lanes are widened (we doubt this is even possible) there would be further loss of ancient hedgerows and habitat and loss of landscape and rural outlooks.
- 3.6. Last time we asked that future consultation should include not only the site of the substation, but the implications of that site with respect to the impact of cables in and out from the site and of ongoing maintenance. Options should be presented which must include offshore alternatives (offshore substations) as part of a strategic grid as well as brownfield sites onshore. This has not happened, instead, National Grid has doubled down on its proposals in a narrow area.
- 3.7. Although relatively sparsely populated the proposed location for the National Grid substation stretches to within 1 mile of both Little Bromley village and of the hamlet of Burnt Heath in our Parish. The area directly impacts many remote properties. The visual impact and operational noise will diminish residents' quality of life and property values would inevitably be affected. There will be a loss of community and resident amenity.
- 3.8. The route disruption in the area from the increased contractor and HGV traffic from the NG, North Falls, Five Estuaries and Tarchon will affect local, farm and business traffic for many years. There is concern that the volume of traffic will effectively sever Little Bromley and parts of Ardleigh and surrounding areas from access to key traffic routes. The lack of a meaningful travel plan or of evidence of a joined-up approach is alarming.

4. Underground cabling including Area of Outstanding Natural Beauty (AONB)

- 4.1. Although we continue to oppose the project, we broadly welcome the introduction of undergrounding between the AONB and the substation, which we called for in the earlier response to the consultation, thus taking the undergrounding beyond the area strictly required. However, this piecemeal approach will create its own challenges with underground and overground cables in very close proximity in part of the route through Ardleigh crossing the same agricultural fields or skirting both sides of narrow country lanes.
- 4.2. Undergrounding still causes significant damage and blight, with swathes up to 100 metres wide excavated and built for vehicle access. Careful construction and mitigation including screening would be required during construction, in respect of the underground sections of line.
- 4.3. The underground sections, even with extensions are still far from sufficient to mitigate blight of the AONB. At the very least, any area which abuts the AONB should also be undergrounded as it will have a significant adverse impact on the AONB. The proposed sub-station is in close proximity to the Dedham Vale AONB. There is the potential for significant damage to the AONB as a result of cables in to and out from the sub-station which are scheduled to run along the southern length of the AONB.
- 4.4. Proper account needs to be taken of the extremely flat topography of the area, especially when combined with the lack of natural screening such that the pylons will dominate the landscape and have widespread visibility within the AONB itself and its setting; and proper account needs to be taken of the presence and position of Listed Buildings. Our topography is very simple. All the Pylons are at about 40m above sea level which is almost exactly the same height as the AONB and most of the Pylons in our parish are within 1.5km of the AONB with a few between 1.5 and 2km. They will create a very visible skyline of Pylons across the whole view into Ardleigh CP, Langham CP and Boxted CP from deep within the AONB. We don't want onshore infrastructure at all, but if we can't stop it these areas should be underground as well.
- 4.5. Whilst the undergrounding of the powerline through the AONB would bring about temporary disruption that would be mitigated over time, it would still bring about significant damage to the area and affect the tourism industry during the construction period. An offshore route would avoid any damage to the AONB.
- 4.6. It is now clear that two new offshore wind farms and at least one other provider will use underground cabling from the coast to their own substations and that these are now expected to be positioned close to that

proposed for the National Grid (NG). It is entirely unclear to us how/why the commercial operators of windfarms are able to justify complete undergrounding while NG are not.

- 4.7. National Grid recognises that significant damage to the AONB would result from use of overhead lines even near to the AONB (CPRSS) and that mitigation, in the form of alternate routes, alternative pylon design or more likely significant sections underground, would be required close to the AONB. Given the significant impact on Ardleigh if this project goes ahead the full run between pylons TB1 and TB35 where NG already propose to go underground, should be undergrounded. This would partly address other concerns below relating to impact on Listed Buildings, heritage assets and Local Protected Green Spaces. To be clear, this should include the whole of Ardleigh.

5. Agriculture and disruption to land

- 5.1. The parish of Ardleigh has some of the best agricultural land in the East of England including designated ancient farmland. Apart from the huge damage that would be caused during construction, there would also be permanent loss of land, due to both the pylons themselves and the substations, which would have a negative impact on the agricultural output and viability of the area and contribution to the food supply chain at a time when the Government food strategy is seeking to improve food security and sustainable production. We have heard from farmers and landowners who are appalled at the proposed development and who do not feel properly consulted including regarding surveys of their land.
- 5.2. Agricultural land is a valuable and diminishing resource throughout the UK, especially in the east where coastal erosion is an issue. The permanent loss of any agricultural land -especially very good quality land - should only be contemplated where it is demonstrably necessary. We do not consider that it is necessary for this development to be onshore. If it was offshore, then the tension between energy security and food security would be dissipated.
- 5.1. In terms of agriculture and the proposed affected fields, in Ardleigh, we would emphasise that this is high grade land is primarily for the purpose of growing food crops - for the benefit of all! The current conflict between Ukraine and Russia is already having an effect on the worldwide food market, and with this in mind, it makes it even more important for us to protect the land that feeds us!
- 5.2. Due to the presence of heavy clay soils, work in agricultural fields must be constrained to the period between April and August in order to mitigate risk to soil structure. It is important that infrastructure / construction within agricultural fields is positioned so as to allow passage and use of modern farm vehicles. This would require National Grid infrastructure / construction to be positioned along field boundaries, preferably making use of the corners of fields, and where not possible allowing 40 m clearance on all sides.
- 5.3. Trenches in agricultural fields should be to a minimum depth of 1500mm to allow for land cultivations such as ploughing. Trees in fields should be avoided and protected during construction. When crossing hedgerows use should be made of existing gaps and otherwise where not possible work should be constrained to just the cable burying width. Gaps created in hedges must be re-planted with mixed native species to match adjacent hedging.

6. Construction and traffic impact

- 6.1. There appears to be no transport strategy! National Grid appear to have no clear plan for access for construction traffic or for getting the transformers in place. We have heard that there may be intention to link in with windfarm providers for haul roads, but we are led to believe that it is not even possible for the very large substation installation parts to travel via the haul roads, as they are currently proposed.
- 6.2. Even if there was a desire to collaborate, we doubt that National Grid can obtain rights over a third party's planning application (ie Five Estuaries and North Falls haul roads). Five Estuaries and North Falls planning applications (DCOs) should surely only relate to their respective developments and for works necessary to build out their own development. For example, they could not seek planning to lay cables for another wind farm operator, or, to seek approval to lay empty culverts for future third-party operators to pull cables through in due course. Regulations for NSIPs/DCOs need to be absolutely clear for landowners when it comes to haul roads for use during and post construction.

- 6.3. On top of this there is Tarchon, route/site/s as yet unknown, as well as repairs, maintenance, parts failures/renewals for substation elements to consider. Especially if, as National Grid indicated at consultation events and mentioned above, haul roads wouldn't be suitable for moving some of the largest parts in/out as currently proposed.
- 6.4. Use of underground cables through residential land is unacceptable and to be avoided at all costs. Where undergrounding is to be used, particular care must be taken in respect of road-movements as the local road network is not suitable for repeated heavy traffic movement and traffic plans must be presented to and agreed by Parish Councils.
- 6.5. Work should be conducted only during regular hours, avoiding evenings and weekends, and not overnight and should proceed 'one field at a time' in order to allow residents to return to normal life as quickly as possible. Trenches should be opened, cables laid, and trenches be re-filled in as short a time as possible (ie months, not years).
- 6.6. Given the nature of the local road network, work must be carried out in a way which will minimise closure of roads. We have particular concerns about Little Bromley Road, Waterhouse Lane close to the substation and the B1029 and A137.
- 6.7. Where use of boring / drilling / tunnelling near to pinch-points necessitates wider compounds these must be located away from populated areas and be subject to further consultation with residents and Parish Councils.
- 6.8. Construction should be started and completed in the minimum possible timeframe within this section to minimize disruption, and not during evenings or weekends.

7. Tourism, leisure and businesses

- 7.1. Ardleigh has a number of businesses relying on tourism and visitors (such as holiday accommodation including caravan and camping site, vineyards, public gardens) which could be blighted by the pylons. We also have angling and sailing on the reservoir and local lakes which could be affected by pylons especially where these cross part of the reservoir or the planned protected Local Green Space.

8. Local archaeology and Scheduled Monument

- 8.1. Ardleigh has been continuously settled since Neolithic times between 4000-200BC. Within our Parish there is a Scheduled Monument which consists of crop circles showing bronze age burial sites, ditches and trackways. In the newest plans the undergrounding section from the substation skirts this Scheduled Monument. This specific area has produced a huge number of archaeological finds from the earliest Neolithic finds through the Bronze Age, Roman period, Iron Age and Saxon period. It is inconceivable (and there is evidence to support this) that the settlements were limited strictly to the site of the Scheduled Monument. Indeed, it is highly likely that the archaeology extends to the North of Little Bromley Road as well.
- 8.2. Therefore, any undergrounding, and pylon erection, in particular, would certainly damage, or destroy, important archaeology. A Roman road from Hythe Quay, Colchester to Mistley Quay, crossed our Parish (and the planned works close to Badley Hall). Siting of pylons, undergrounding haul roads and substations would inevitably and seriously damage the archaeology of Ardleigh.
- 8.3. The image below is taken from a book called the Archaeology of Ardleigh, Essex produced by East Anglian Archaeology Report No . 90, 1999, it shows the cropmarks which have been identified as being of archaeological interest. Area B which is bounded to the North by Little Bromley Road has not been investigated as yet. It is not included in the Scheduled Monument which is immediately South of the boundary, but clearly has significant evidence of archaeology. The undergrounding would cut a trench through this area which in our view should not be allowed.
- 6.9. As there is clear evidence of crop marks showing signs of settlement boundaries and potential for below-ground archaeological deposits etc. there would need to be a programme of archaeological investigation before any development, including preliminary groundworks.

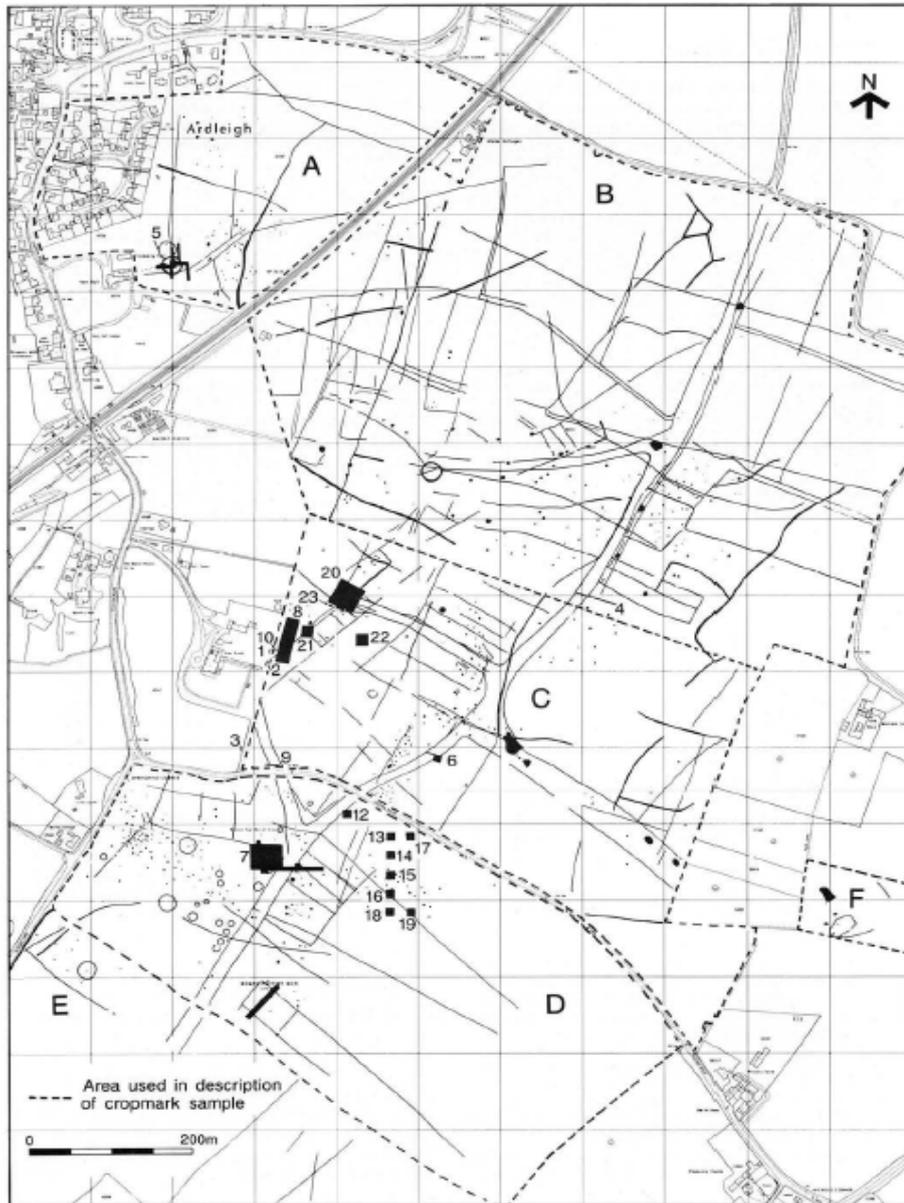
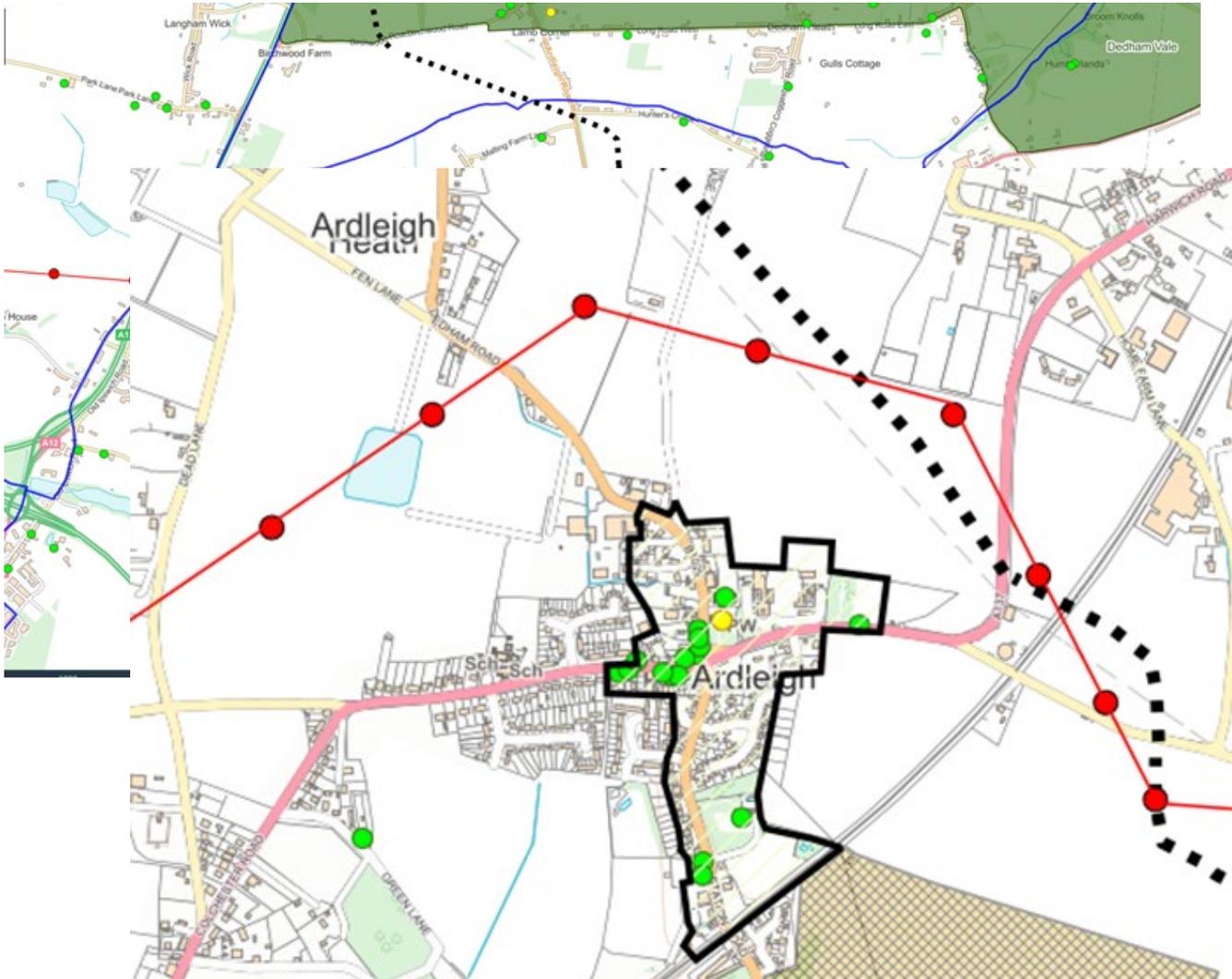


Figure 7 Cropmark complex with location of CEU excavation areas. Letters relate to areas used in replotting the cropmarks, and these areas are indicated by broken lines

8. Heritage including Listed Buildings

- 8.4. There are around 72 local Listed Buildings in the Parish of Ardleigh. Nearly all the Listed Buildings would be within sight of the Pylons including the Conservation Area at the heart of the village. Listed Buildings have protection not just in terms of the buildings themselves but also in relation to the context of the landscape in which they sit. This proposal will permanently damage the context and settings of the listed building and of wider heritage assets.
- 8.5. The Settlement Development Area and Conservation Area are surrounded on three sides by pylons within around 200 – 400 meters. It will feel like being in a ‘pylon cage’! Along the route of the pylons, we have dwellings including many Listed Buildings that are as close as 50 meters to the pylon route with virtually every property affected by the view.

- 8.6. The map below shows specific pylons visible from the Conservation Area. Pylons TB8 -TB16 are in particular very intrusive on the heart of the medieval village including the Church and around 16 listed buildings marked in green.
- 8.7. The map below shows Ardleigh Conservation Area and the listed buildings with the route of the proposed pylons superimposed. There are more than 70 listed buildings in the Parish of Ardleigh most of which will have their views blighted by the pylons. Many of these are within 250 meters of the Pylon route. The Pylon route will also be visible from Listed buildings within the AONB as the route is less than 1.5 kilometres to the South.



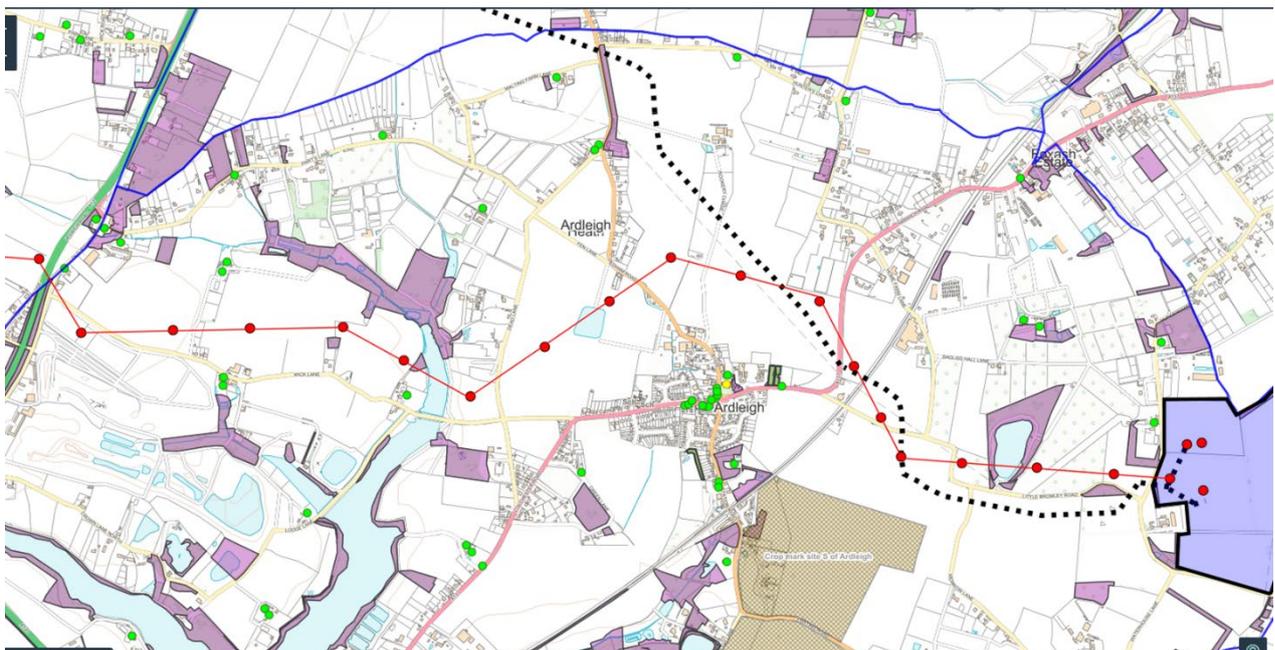
9. Habitats & biodiversity

- 9.1. The Parish of Ardleigh has an extremely diverse and rich wildlife and contains ancient woodland and priority habitats. It also has a reservoir which is the home of both indigenous and migratory birds (including swans, herons, cormorants, ducks and geese as well as occasional visitors such as bittern and osprey) and wildlife (including bats). The building of haul roads, erection of pylons and construction of substations would be extremely damaging to the wildlife of Ardleigh.
- 9.2. The ESNP landscapes report when looking at the Ardleigh area mentions "Breeding & nesting site for owls, buzzards, swans and great crested grebes. There is an active bat population around the nearby reservoir and woodland". Another report discusses the "bird hot spot" at the reservoir. Local intelligence would support and provide further evidence of the varied wildlife in the area. An image of swans nesting on the shores of Ardleigh Reservoir under the route of the pylons is below.



9.3. The National Grid proposals would affect the environment directly; due to extensive habitat loss due to the high volume of land take/ loss of habitat, including the decimation of trees and hedgerows, and indirectly; due to the disturbance of habitat during construction. In addition, there is the known issue of bird fatalities caused by striking powerlines.

9.4. The map below shows the areas, in purple, that are woodlands and most are also Priority Habitats designated as by Natural England. Priority Habitats are those which have been deemed to be of principal importance for the purpose of conserving biodiversity, being listed in the UK Biodiversity Action Plan, and with maintenance and restoration of these habitats being promoted through Agri-environment schemes. There are a few places where the routes go through designated woodlands including the area close to the proposed substation and on either side of Little Bromley Road where the impact can only be devastating to the biodiversity of the area. On the wider route through Ardleigh we remain concerned about the impact on trees and hedgerows. For example there are some quite large mature trees in hedgerows which we intend to gather further information on in the coming months.



9.5. If the proposals go ahead there would be a detrimental effect on wildlife habitats around the reservoir and especially around the proposed EACN (which would require external lighting and create noise that would both severely hinder the use of the adjacent habitats by all wildlife, especially bats).

8. Landscape and visual including Green Spaces and our Neighbourhood Plan

- 8.1. Since 2020 we have been developing a Neighbourhood Plan for Ardleigh is now at Regulation 17 stage. During the consultation for this emerging plan the overwhelming majority of respondents told us that they valued the green spaces and rural feel of our parish and did not wish to see further development . We did not ask directly about pylons, but cannot conceive that 50m high pylons could be compatible with the aspiration to protect our rural setting.
- 8.2. In our previous consultation response we highlighted plans for new Protected Local Green Spaces to further protect specific areas which are valued by our residents as places of beauty, tranquillity or local interest. One in particular would now have pylons passing directly over it if the latest proposals go ahead. This is an area of public footpaths and a lake behind the village Primary School which our residents wish to be protected for future generations. Pylon numbers TB14 and TB 15 cross this space.
- 8.3. Our Neighbourhood Plan (<https://ardleigh.website/our-plan>) describes this space as follow *'Space 3: Fishing lake and footpaths north of Colchester Road 13.14. The site comprises public footpaths and a fishing lake. 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 mediaeval nuclear village of Ardleigh surrounding working countryside. It has been used for recreational walking by villagers for hundreds of years. It provides the only glimpse of open countryside available from Colchester Road (within the built-up area of the village). The fishing lake is replete with local wildlife, including a variety of birds and bats. Given its close proximity to the village centre, it is a surprisingly tranquil place with a perceptible sense of being far away from people and settlement. It is subject to regular recreational use by a local fishing club.'*
- 8.4. An image is provided below. Overhead lines would cross directly over the lake! As a minimum, cables should go underground in such spaces.



- 8.5. Further, pylons TB20 and TB21 would have a substantial detrimental impact on planned Public Open Space (see approved application ESS/57/04/TEN) with pylons sited on or in very close proximity of the site. In around 2010, planning permission was granted by Essex County Council for a major extension of Ardleigh Reservoir. A new area of Public Open Space - in conjunction with new habitat creation - was proposed as a fundamental part of this application. As part of the planned Public Open Space, a new circular footpath link would be introduced around the perimeter of the reservoir, accessible from the adjacent car park. This would be designed to facilitate safe public access to the reservoir by all residents, including disabled people and those with mobility restrictions. This was put forward as a firm social and environmental benefit of application ESS/57/04/TEN, especially as public access to the existing reservoir is currently very limited. Consequently, the creation of new accessible and high quality Public Open Space and footpaths in this

location would greatly enhance the area's landscape value, biodiversity/wildlife value and - above all - its recreational use by and value to the local resident community. Unfortunately, we believe that the National Grid proposals would fatally undermine all of these objectives.

9. Strategic solutions and collaboration

9.1. Alongside the National Grid consultation North Falls and Five Estuaries have been consulting and liaising with landowners about their own proposed routes from sea to land and on to the rest of the power network. We understand that the initial cabling will be underground taking different routes across the Tendring peninsular heading to the new substations the locations of which seem to be congregating close to the proposed EACN (see above).

9.2. In December 2021 we responded to the North Falls consultation, copied to Five Estuaries, as follows

'In principle, the Parish Council supports the generation of green energy and is not opposed to the development of offshore wind farms. We are, however, very concerned about the loss of high-grade agricultural land, which is in relatively short supply in the wider area and is vital for food production. There are concerns about potential damage to the ecology of the land used and passed through, as well as potential disruption to the communities caused by the cabling and other infrastructure required.

Our particular concerns relate to the potential proliferation of sub-stations and the cumulative impacts of numerous sub-stations, battery storage and associated cabling.

Our understanding (partly from the meeting with yourselves) is that it would be technically possible for some infrastructure to be shared between providers, but that there were commercial and (perhaps) legal/competition constraints which mean that multiple sites and cabling would be needed. Further, that some of the cabling and infrastructure could be placed offshore, but that this would be more costly and time consuming (and perhaps less commercially viable).

We feel that there is a parallel with the telecommunications sector where mobile operators were not able/willing to share masts until required to do so by legislation (eg Shared Rural Network).

We would therefore urge all parties to recognise the value of working together in order to minimise disruption to communities and to the ecology of the area and to lobby for this to be made possible. Further we would urge that brown field, rather than agricultural land is used for the sub-stations etc. We will be liaising with other councils in our area, at all levels, and with our MP (District and County Councillors and MP for Ardleigh all copied) to seek to promote a more collaborative approach to infrastructure requirements of the new wind farms which does not cause harm to the landscape, ecology and minimises disruption to our communities.'

9.3. As these project have progressed we have developed a better understanding of the issues but our questions remain. The fact that each provider and National Grid will each need their own substations is partly due to the regulatory position which prevents full co-operation and sharing of infrastructure and which favours old technology in the form of pylons. Three factors/barriers have been mentioned by National Grid representatives which (they tell us) prevent proper consideration of an integrated offshore solution. These barriers are the National Planning Policy Framework, the 'regulators' and Environmental Regulations all of which artificially favour onshore pylons over off shore. Despite the efforts of our MPs and local campaigners to seek discussion of changes needed to the regulatory and legal framework we see little evidence that National Grid have been pressing for this or attempted to address our concerns and suggestions since the last consultation.

9.4. We are aware of a recently published open letter from ESO <https://www.nationalgrideso.com/document/286066/download> which gives us a glimmer of hope that the barriers to an offshore network might be addressed. Rather than shutting down discussion of the offshore option, making excuses and excluding this from consultation options (A National Grid representative claimed it would be 'misleading' and 'disingenuous' to include it given the current framework) we want National Grid to join us in seeking a more creative and genuinely strategic solution and to push for updates to the regulatory and legal systems to make that possible.

9.5. Similar issues were flagged by Tendring District Council in the 2022 consultation;

'We are very concerned about an apparent lack of coordination between engagement on East Anglia Green, North Falls and Five Estuaries. Whilst it is understood that these projects are being promoted by three

separate organisations, the fact that they are so closely interrelated and are all aimed at helping to achieve government targets for zero carbon, a more coordinated approach to consultation and the planning process should surely be achievable.

There is confusion as to the differences between the three projects and are unclear as to how they relate to one another. For example, in considering this consultation, many residents are interested in understanding how the connection from the offshore windfarms to the substation and 400kV powerline will be achieved - these are questions that National Grid is not in a position to answer as North Falls and Five Estuaries are being promoted separately.

There is also significant concern about the impact, efficiency and common sense of separate offshore windfarms making land-fall at separate locations and having separate harmful impacts in terms of routing across the countryside and in the establishment of multiple substations.'

- 9.6. The impact on local people, and presumably the overall cost to consumers, is exacerbated by a lack of joined up thinking or co-ordination which will lead to the creation of parallel infrastructures which ought to be technically possible to share. These issues could be addressed through a strategic offshore grid and changes to regulatory restrictions to support full collaboration. We, again, call on all parties to seek collaborative solutions which have the least-negative impact both on our communities and our environment even if they prove to be more expensive.
- 9.7. An integrated offshore grid will allow offshore generators such as North Falls and Five Estuaries to deliver their energy to areas of the country that require it. The NG proposal is designed to connect from Norwich to Tilbury – and to do this largely through pylons will wreak havoc on the East Anglian countryside. The proposed National Grid EACN substation at Ardleigh bordering Little Bromley is located to connect the offshore energy provider substations into the Grid. If an offshore grid is built then there is no need for these developments. It seems ironic that with offshore wind generation now being the preferred route for green wind energy, that onshore power distribution through pylons is even considered. Electricity pylons were initially designed in 1928 with the first deployments being in 1938. Green Energy in the 21st Century should not rely on a 1920/ 1930 distribution solution with its enormous impact on the environment, wildlife and communities. The benefits and value of a 21st Century offshore grid far outweighs any cost uplift, and will allow the UK to demonstrate to the country and the world its leading expertise in this area. Subsea cables are proven technology, let's use it!
- 9.8. National Grid have a 700km subsea cable between the UK and Norway and there are many interconnector cables between the UK and Europe. Tarchon, who NG has offered a connection into EACN, are designing a 540km interconnector between the UK and Germany. The use of an offshore power grid will provide a standard for offshore energy providers to adhere to. Both North Falls and Five Estuaries are designing in isolation up to their connection into EACN. They are choosing their own cables routes and their own substation sites. This duplication will cause increased pressure on Tendring and increased disruption to communities. An offshore power grid will negate this. We would ask National Grid to reflect in more detail on the impact that their proposal will have on the local Tendring areas around Little Bromley and Ardleigh.

10. Summary

- As stated above, we endorse the position of the Essex, Suffolk, Norfolk Pylons campaign.
- This proposal with its pylons and substations would be devastating to our landscape, wildlife, agriculture, archaeology, heritage and most importantly the wellbeing of our residents.
- National Grid keep telling us that we are at the early stages of this project. Therefore, we urge National Grid to listen and to properly explore options for strategic offshore solutions, and to include these in future consultation (pending any required changes to regulations) and to stop the current proposals from progressing further before it is too late.

*Ardleigh Parish Council
August 2023
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