



Ardleigh Parish Council

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National Infrastructure Projects
The Planning Inspectorate
By email NIEnquiries@planninginspectorate.gov.uk
FiveEstuaries@planninginspectorate.gov.uk

21 June 2024

Dear Madam/Sir,

Ardleigh Parish Council Five Estuaries Offshore Windfarm relevant representation. PINS registration identification number 20049253

Ardleigh Parish Council (APC) has grave concerns about the proposals which, combined with other related proposed infrastructure projects, would have a profound impact on our Parish. We wish to include previous responses to Five Estuaries Offshore Windfarm (FE) consultations in this representation (August 2022 and May 2023- reproduced below) as well as responses to the National Grid Norwich to Tilbury consultation to which this proposal is directly (and physically) linked.

Our key concern is the grid connection offered to Five Estuaries is the proposed (and yet to be agreed) East Anglia Connection Node (EACN) substation which would be situated in our Parish. We do not support the siting of the EACN in Ardleigh, believing that alternatives have not been properly considered and that the methodology, which proposed that connection in Ardleigh, is flawed. We further consider that this application is premature, since it relies on a link to the EACN which itself is not yet approved.

If this scheme goes ahead there would be significant, irreversible and largely unmitigable harms to Ardleigh. These harms would include damage to:-

- environment, habitat and species;
- landscape, public rights of way and green spaces;
- health and wellbeing of residents, especially those close to the substations or undergrounding and living on access routes;
- businesses- including agriculture and tourism;
- traffic and related disruption including HGV movements and damage caused by haul roads.

We would particularly highlight the cumulative impact of, and harm caused by, multiple schemes including Norwich to Tilbury, Tarchon interconnector, North Falls offshore windfarm and additional battery storage and other energy related infrastructure which is already coming forward. Ardleigh would be disproportionately impacted by these schemes. Therefore, additional help and specific mitigations would be needed for Ardleigh should the schemes ultimately be consented.

We are aware of and endorse the concerns expressed by Tendring District Council in the relation to the Five Estuaries DCO. In particular

- *'TDC supports the Governments target of net zero by 2050, including the expansion of renewable energy utilizing off-shore wind generation*
- *The application assumes an underground connection into a proposed substation, East Anglian Connection Node (EACN) east of Ardleigh. This is part of the National Grid Norwich to Tilbury upgrade. The EACN is unconsented and in Statutory Consultation Stage, as such this application is premature.*
- *TDC believes that an offshore integrated approach to achieving the UKs net zero legislative targets is the most appropriate. As such TDC believes the outcome of Offshore Coordination Support Scheme (OCSS) feasibility study into an offshore connection to Sealink (grant funded from Department of Energy Security and Net Zero) could illustrate how the offshore is achievable. In this respect, the application is premature.*
- *The Cumulative Impacts of this and three other associated infrastructure projects – North Falls Offshore Windfarm, Tarchon Interconnector and EACN as part of the Norwich to Tilbury upgrade - have not been fully considered. Greater integration on all these projects (including full consideration of the OCSS outcomes) could negate the need for onshore transmission.*
- *The location of the connection point for FE is dictated by the N2T project. The landscape in this area is predominantly arable, flat, open and rural. These proposals will introduce an intrusive industrial visual blight changing the landscape forever.*
- *Tendring, as a host authority will experience a disproportionate level of negative impacts from the construction and operation of onshore transmission networks. Mitigation in the form of Community Benefit, is not accounted for within the planning system. TDC welcomes discussions for a voluntary Community Benefit Contribution package for the lifetime of the project.*
- *Measures that address social value are important to TDC. Whilst there is ongoing engagement with the applicant, there are no definitive commitments to education, training or employment within the District. We would consider any project of this scale that does not address the economic disparity of those unable to access jobs through the transition to net zero to be unacceptable.*
- *Impacts on tourism within the District, both highways and visual impact at the coast during the construction phase. Tourism plays a significant role in the Tendring economy, supporting hotels, caravan parks, tourist attractions and indirect spend with shops cafes etc in the local economy are likely to suffer.'*

In addition to these points, we would highlight

- impact on heritage assets- including proximity to a Scheduled Monument and various Non-Designated Assets including the routes of Roman Roads.
- Unjustifiable loss of best and most versatile agricultural land and harm to farming and related businesses within Tendring and around Ardleigh in particular.

More details of the expected harms will be included in our response to the National Grid Norwich to Tilbury Statutory Consultation currently in preparation.

Yours sincerely,

R Fletcher

Rachel Fletcher
Parish Clerk and Proper Officer



Ardleigh Parish Council response to Five Estuaries Off-shore Windfarm consultation May 2023

Our Parish Council has previously responded to consultation by Five Estuaries, most recently on 12 August 2022. Those earlier comments still stand and we do not intend to repeat them here except to clarify or emphasise a few points. We would ask that our earlier responses are taken in to account for the current consultation.

As previously stated, 'In principle, the Parish Council supports the generation of green energy and is not opposed to the development of off-shore wind farms.'

However, we object in the strongest terms to this unnecessary connection onshore. This will result in tunnelling beneath the shoreline, trenching to place underground cables through Tendring, and a sub-station near to or within Ardleigh (with further sub-stations needed for National Grid and for other providers).

This damaging onshore connection is unnecessary because both Five Estuaries and sister project North Falls could, and should, connect offshore. National Grid ESO has already carried out advanced scenario testing of offshore coordination options.

We know that National Grid has offered this connection point to you but we urge you to do the right thing for the environment and communities and to reject National Grid's unacceptable offer. You will be aware that the connection offered is deeply damaging, being in the centre of a 180km pylon route, and adjacent to the AONB where the pylons create a ring of steel around Ardleigh which would thus be uniquely and profoundly affected. This project is many years from a planning permission, if it succeeds at all.

Our residents care deeply about their environment and the rural characteristics around our Parish. This was emphasised during consultation for our Neighbourhood Plan- which has been endorsed by Tendring District and now reached Regulation 15 and 16 consultation stage. *'It is the overwhelming view of the people who live and work in the Parish of Ardleigh that it should above all else retain its rural characteristics, including the visual quality of its buildings, open spaces, trees, hedges, footpaths and bridleways... There is also a strong sense of community in Ardleigh which should be protected and nurtured throughout all parts of the Parish, including its outlying hamlets...'* (para 6.29-6.30 Ardleigh Neighbourhood Plan). More details of the emerging Plan are on the Tendring DC site <https://www.tendringdc.uk/sub-content-pages/ardleigh-neighbourhood-plan> or our own site <https://ardleigh.website/our-plan>. We consider the proposals by Five Estuaries and the associated proposals from National Grid to threaten the very things which our residents tell us they value about where they live. We are therefore bound to oppose them.

The latest consultation has revealed more data about the potential traffic movements which are a cause of grave concern for our residents. There are particular concerns about the impact on the road and lane network in the areas around the new sub-stations and of safety for all users but especially those on foot/

cycling or on horseback along the very narrow lanes. Such concerns would be exacerbated if several substations are contiguously or closely located. If the existing lanes are used by construction traffic we struggle to see how mitigation could prevent a very significant and negative impact on local residents particularly those who use the lanes for leisure and could well be prevented from doing so if sharing with HGVs.

It is noted that Five Estuaries themselves estimate that the average number of HGV's journeys along the B1029 each day will be up to 73 for the duration of the project which is expected to take between 18 and 24 months as well as temporary construction compounds along "a corridor route" for Parking, Welfare Facilities for its staff, Material set-down areas and Access points with large compounds needed where drilling is carried out. This would inevitably impact the entire stretch of the B1029 including Burnt Heath, Ardleigh and Ardleigh village to the junction with the A137.

In addition we would emphasise local concerns around

- Agricultural Land. loss and damage to significant areas of high grade agricultural land- at a time when food security is of increased concern
- Landscape and Views. The topography around Ardleigh means there are vast open vistas across productive farmland which could be disfigured forever by proposed pylons and substations

Please do the right thing by RWE's own responsibility and sustainability goals: *"RWE is helping to shape the sustainable future of the world's power supply. As part of society and a key player in the worldwide energy market, we are aware of the responsibility that goes with our role. We exercise that responsibility every day by applying clear principles to our corporate and social actions. Every single person at RWE – from Executive Board members and managers to colleagues and line staff – contributes by acting responsibly towards others and the environment. For RWE, taking responsibility means taking socially relevant issues into consideration in our corporate decision-making processes, keeping an eye on the consequences of our actions beyond our own area of responsibility and considering corporate activities from an ecological, social and ethical standpoint as well as from a business perspective. Corporate Responsibility is part of the contribution RWE makes to sustainable development and responsible business management. Everything from environmental protection and climate-change mitigation, social concerns and human rights through to responsible corporate governance is taken into account – as RWE does justice to its responsibility in every sense."*

We urge you put these good words into practice and to work with Government through its current coordination schemes to connect offshore instead.

*Ardleigh Parish Council
12 May 2023*



Ardleigh Parish Council response to Five Estuaries Off-shore Windfarm consultation August 2022

1. Introduction

- 1.1. Ardleigh Parish Council submitted a strong objection to the National Grid (NG) East Anglia GREEN proposals in July 2022. A copy of our response is attached.
- 1.2. Five Estuaries have told us *'In order to connect the new wind farm to the national electricity network, National Grid has indicated to us that they would like us to connect to their proposed East Anglia Connection Substation south of Lawford, which is part of their East Anglia GREEN project.'* Email to our Parish Council Five Estuaries 30 June 2022
- 1.3. Given the obvious connections between the two projects (ultimately a physical connection if the proposals go ahead) all of our concerns and objections to the National Grid proposals must also apply to Five Estuaries, together with the strong call for an alternative off-shore grid to be taken forward. We would therefore ask that our response to the National Grid consultation is taken into account as part of the feedback to the current proposals.
- 1.4. Under the East Anglia GREEN proposals, Ardleigh would be uniquely and profoundly affected. There would be cables crossing our Parish in two directions, with a double line/ pinch point through Ardleigh approaching the proposed NG sub-station. In effect three sides of Ardleigh village, would be skirted or crossed.
- 1.5. A key reason for this pinch point in Ardleigh is the location of a new sub-station which would connect to the new wind farms including Five Estuaries. An alternative off-shore solution would not only protect the swathes of Tendring being dug up for underground cabling, but would address the specific issues around Ardleigh, already referred to and covered in our NG objection.
- 1.6. 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), -eg 'The selected site does critical damage to the Tendring Peninsula and the village of Ardleigh' and of our MP, Sir Bernard Jenkin.
- 1.7. 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, local authorities and the government etc) to work together and, if necessary, 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.
- 1.8. The focus on on-shore seems to be related to a desire/necessity to deliver by 2030. It is important to realise that the National Grid proposals are at a relatively early stage and not agreed. National Grid seem to be looking primarily at build time. Whilst the construction time for pylons and underground cabling might be moderately shorter than building undersea, on-shore would necessarily be preceded by a lengthy planning and approval process which may well run for 4 years or more. Off-shore would be subject to none of these constraints and construction could begin years earlier. The appropriate measure is 'now to completion', and not 'start of construction to completion'. Under the appropriate measure off-shore carries less risks and is likely faster. Five Estuaries should therefore not accept the only option they have been given to connect to the new East Anglia Connection Sub-station south of Lawford (likely to be in Ardleigh) as part of the East Anglia GREEN project
- 1.9. We are aware of OFGEM expectation that windfarm operators try to cooperate off-shore. It is not acceptable to dig up Tendring to connect to 180km of pylons when there should be a strategic off-shore grid

which is better for consumers, communities and countryside. We urge you to lobby National Grid for an off-shore grid to connect to instead

- 1.10. In their objections to East Anglia GREEN, TDC Essex County Council and our MP have made direct reference to the impact on Ardleigh, and hence its communities, landscape and wider environment. Some of these specific concerns are covered in our East Anglia GREEN response.
- 1.11. We would reiterate a point made in our earlier response that 'In addition the considerable community anxiety being generated by the prospect of large-scale and intrusive physical on-shore infrastructure in the form of pylons and sub-stations in sensitive locations close to homes, with associated concerns about health (mental health and concerns about 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 off-shore 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'.
- 1.12. The current energy crisis, rising consumer costs and the need for energy security in the UK should not be used as justification to rush forward with damaging and ultimately counter-productive proposals. The necessary time must be taken now to properly consider and then to deliver a strategic off-shore solution which will be more resilient and robust for the longer term while also protecting our communities, agricultural capability and countryside.

2. Route corridor considerations- Five Estuaries (Q1)

- 2.1. The cabling will damage prime agricultural land, rural environments and tourism.
- 2.2. Most of Tendring has small single lane roads that become very busy during holidays and weekends due to holiday traffic and day trippers.
- 2.3. It seems that some people think undergrounding is simple and not as bad as pylons. We are aware that it still requires 60m-100m haul roads to be built for route of the trenches, for the heavy vehicles to move along. And despite attempts to return the land to its original state, evidence shows it will never really recover.
- 2.4. Having said this, we consider underground cabling to be marginally preferable to Pylons, and are interested to understand why the commercial operators of windfarms, such as Five Estuaries, are able to justify undergrounding while NG are not? If this is related to regulatory/ competition requirements we urge a change of approach and for the requirements to be updated to reflect the current realities and aspirations for net zero!
- 2.5. We do not consider that the current proposals are 'green' in any way to bring energy ashore when it should be routed through the sea from the windfarms to Tilbury. Tonnes of concrete and steel is not 'green' but that would be needed for the proposals.

3. Sub-station location- Five Estuaries (Q2)

- 3.1. Ardleigh Parish Council does not believe there should be any additional sub-stations in rural Tendring – whether to service National Grid, Five Estuaries or North Falls.
- 3.2. The total area proposed will destroy many acres of prime farmland as well as disturbing natural environments and habitats for nature, and the wellbeing for residents due to environmental impacts such as noise and light pollution.
- 3.3. The cables & supply should be run under the sea. NG have promoted the successful trans-continental subsea networks they have with Europe, and Scotland to the NE of England so why not from East Anglia to Tilbury?
- 3.4. We are extremely concerned about the potential land-take and height of the new sub-station(s). For most of the proposed sites (and the current Lawford sub-station situated not in Lawford but in Little Bromley at the border of Ardleigh) there is extremely poor road access, via narrow country lanes which would be badly affected during the construction process to accommodate the huge vehicles required. These concerns are magnified by additional sub-stations should they be located alongside.
- 3.5. The areas proposed are generally flat and rural, with narrow lanes, which are used by walkers and horse-riders and with very little light pollution. The people living in the immediate area, or using it for leisure, would be impacted forever, not just during construction.

- 3.6. The size of the proposed sub-station is enormous and would dwarf the existing sub-station (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 their contribution to the food supply chain.
- 3.7. The disruption during the construction phases would be enormous. We understand that haul roads of high specification would be built to manage the construction traffic. Once completed the haul roads would be removed and the local road network used for ongoing maintenance and there would be noise and light pollution affecting local residents. 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 if battery storage is included. If the existing lanes are widened (if this is even possible?) there would be further loss of ancient hedgerows and habitat and loss of landscape and rural outlooks.

4. Off-shore (Q3)

- 4.1. There is now an expectation from OFGEM that wind farm operators and NG should co-operate, off-shore and on-shore, to co-ordinate and minimise the number of on-shore connections either by sharing larger capacity infrastructure or by connecting to an undersea ring main which could connect to land at strategic points such as Sizewell, Bramford, Bradwell and Tilbury. Adopting this approach would not only save the industry up to £6bn, it would reduce the impact on our countryside. It would ultimately give savings to consumers, which is crucial given the current and likely future inflation on energy costs.
- 4.2. Off-shore wind farms are an accepted part of the local seascape and preferable to on-shore.
- 4.3. It appears that windfarms have interconnecting abilities undersea so the technology should be applied in most cases instead of simply devastating productive countryside and agricultural land, in this time of food supply issues worldwide. There is an alternative option – please use it and take it under the sea.
- 4.4. Studies have shown that marine life can return and increase around the areas of windfarms and cables after a while making it more sustainable than on land development.
- 4.5. In the summer of 2022 we have seen a number of pylon-related fires. Cabling under the sea would remove this risk.

5. Other comments (Q4)

- 5.1. We cannot afford to lose huge land areas in one of the most productive food growth areas. The addition of more sub-stations would be a terrible blight on East Anglia as there are already more massive power-producing projects than elsewhere in the UK and Tendring has more than its share of these.
- 5.2. We do accept that we need a multiple technology (including wind farms) approach to the future generation of electricity, as we move away from hydrocarbon generation. As already stated, we would urge you to lobby Government, National Grid and the generation industry to deliver this, including any required changes to the commercial, regulatory and legislative frameworks, under which the industry operates. Failure to achieve a strategic and multi-technology approach will mean further loss of agricultural land, decimation of our countryside and continual public opposition not to mention extra costs.

6. How we would like to be consulted (Q5)

- 6.1. None of the proposed providers have offered a public consultation event in Ardleigh. We would urge this to happen in future consultations. We would also call for consultation to include more information up front (we had to ask to see detailed maps and parish boundaries for example) and more time to respond.
- 6.2. Future consultation should include, not only the site(s) of the sub-station, but the implications of each 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 off-shore alternatives (off-shore sub-stations) as part of a strategic grid as well as brownfield sites on-shore.

7. Emerging Ardleigh Neighbourhood Plan

- 7.1. The Ardleigh Neighbourhood Plan (NP) was published on 8 August 2022 for Regulation 14 Pre-Submission consultation following more than two years of preparation <https://ardleigh.website/our-plan>. Throughout this process consultation with our residents firmly steered us to protect the rural aspects of Ardleigh- particularly the agricultural land surrounding the village and hamlets, to protect and enhance local green spaces and not to further develop the Parish.
- 7.2. We are aware that the Five Estuaries proposals are considered to be a nationally significant Infrastructure project but we feel that the application in isolation, let alone when viewed alongside the NG proposals,

would have a damaging and industrialising effect on the landscape which we seek to protect, and we believe is not compliant either our emerging Neighbourhood Plan, nor the Tendring Local Plan (if it were possible for these to be taken in to account).

- 7.3. Specific areas where there could be conflict with the Local Plan and Emerging Neighbourhood Plan include ensuring that permissible countryside development are modest in scale and impact. The Neighbourhood Plan Policy GDP (General Approach to Development) provides additional support for modest developments, provided specific criteria are met such as small businesses compatible with their countryside settings. Further, policy EP (Natural Built and Historic Environment) provides support where for development consistent with other relevant NP policies provided 'no urbanising effect is had on a rural lane... for example... hedgerow removals or loss of an open landscape view'

8. Strategic solutions and collaboration.

- 8.1. Back in 2021 we responded to the North Falls earlier consultation and copied it to Five Estuaries on 21 January this year as follows

'In principle, the Parish Council supports the generation of green energy and is not opposed to the development of off-shore 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 ... 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 off-shore, 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.' Our emphasis

- 8.2. These are not empty words. In the months since we wrote this, there has been growing opposition from across the three counties of Essex, Suffolk and Norfolk- including all three County Councils- which shows the strength of the desire to protect our countryside. There is a groundswell of opposition and a real risk to providers of protracted legal arguments before any permission may be granted and work can start.
- 8.3. It is better, surely, to support genuinely green energy proposals which would be under the sea rather than on-shore (whether underground or overground) and to put pressure on National Grid and the Government to make this happen.
- 8.4. The impact on local people, and presumably the overall cost to consumers, is increased by a lack of joined-up thinking/ co-ordination and the creation of parallel infrastructure which ought to be (technically) possible to share. These issues could be addressed through a strategic off-shore grid and changes to regulatory restrictions to support full collaboration. We, will continue to call on all parties to seek collaborative solutions which have the least-negative impact both on our communities and our environment.
- 8.5. We look forward to your reply to the questions raised, and to further opportunities for direct and meaningful engagement on these issues.