

Ardleigh Parish Council & Little Bromley Parish Council

Implications of the Draft Statement of Common Ground with Tarchon for the East Anglia Connection Node: EN0200027 003759

1. Introduction

Ardleigh Parish Council and Little Bromley Parish Council submit this Deadline 7 representation to address the implications of the Draft Statement of Common Ground between National Grid and Tarchon. The document is significant because it identifies uncertainty within the Applicant's own coordination material concerning the East Anglia Connection Node ("EACN"), including bay locations, connection interfaces, design responsibility, construction coordination, access, sequencing and cumulative effects.

The Parish Councils do not suggest that every outstanding technical detail must be finally designed before consent. However, where unresolved interface matters may affect the authorised development, compulsory acquisition or temporary possession powers, construction access, safety arrangements, cumulative effects or the environmental assessment, the Examining Authority should not assume that the submitted assessments remain robust unless the Applicant demonstrates that all credible interface outcomes fall within the assessed worst case and within the draft Order limits and limits of deviation.

2. Matters arising from the Tarchon SoCG

2.1 EACN design, bay locations and connection interfaces remain uncertain

For each disputed SoCG topic concerning the EACN, the Applicant should be required to identify the topic number, the current status of agreement or disagreement, National Grid's position and Tarchon's position. That is necessary because the present material records unresolved matters about permanent EACN infrastructure coordinates and designated bay locations, with Tarchon seeking information which National Grid has not yet provided. National Grid appears to attribute at least part of the difficulty to NESO engagement and to acknowledge that the EACN layout has changed since DCO submission.

The significance is not merely that "details remain outstanding". The issue is whether the draft DCO envelope, order limits and limits of deviation already accommodate the range of realistic interface outcomes. If altered bay locations, cable crossings, access requirements, additional land take or changed construction sequencing would fall outside the assessed parameters, or would materially alter the worst case assessed in the Environmental Statement, the EACN cannot safely be treated as sufficiently defined for assessment and land powers purposes.

2.2 Responsibilities and coordination are unresolved

The SoCG also records unresolved responsibility and coordination issues. In particular, it refers to the possibility that Tarchon may be required to design, procure and construct its own bay or bays within the EACN perimeter fence, despite the position previously understood under the 2022 Connection Agreement. That raises issues going beyond contractual allocation. It may affect CDM responsibility, safety management, outage planning, construction sequencing, access control, responsibility for temporary works, the need for land powers and the deliverability of the authorised development.

Tri-party engagement between National Grid, NESO and Tarchon has not, on the material presently available, resolved these issues. The Parish Councils' concern is therefore not simply one of administrative tidiness. It is that unresolved interface responsibility may translate into late design changes, altered access requirements, further temporary possession, additional construction activity, revised safety arrangements and cumulative impacts on communities including Little Bromley and Ardleigh.

2.3 Assessment consequences and cumulative effects

The unresolved matters may affect several categories of assessment conclusion. Altered bay locations could affect landscape and visual impact, noise, lighting, drainage, ecological effects and the relationship with nearby receptors. Cable crossings and interface works could affect construction methodology, safety, outages, programme and cumulative construction disturbance. Access requirements could affect local roads, traffic management, verge and hedgerow impacts and landowner disruption. Additional or different land take could affect compulsory acquisition, temporary possession, agricultural holdings and mitigation. Changed construction sequencing could affect the duration and overlap of impacts with North Falls Offshore Wind Farm, Five Estuaries Offshore Wind Farm and other connecting projects.

Those matters engage environmental assessment, land powers, deliverability, safety and cumulative effects. This is particularly significant because Ardleigh and Little Bromley already face the proposed EACN, the existing Little Bromley substation, a consented battery storage facility, multiple cable corridors and proposed converter stations. Unless the Applicant demonstrates that all credible interface outcomes have been assessed as part of the worst case, the cumulative assessment cannot be treated as resting on confirmed or adequately bounded infrastructure.

3. Consequences for the Parishes

Residents and landowners cannot presently understand the final EACN footprint, bay locations, cable routes, access arrangements, temporary and permanent land take, or the extent to which additional compulsory acquisition or temporary possession powers may be required if final interface arrangements change. If further powers could be

required, that is a substantive examination issue and not merely a matter of post-consent design evolution.

The Parish Councils also reiterate their long-standing position that the EACN is inappropriately sited. It would concentrate substantial grid infrastructure in a rural area already affected by energy development, with unacceptable consequences for landscape character, residential amenity, local roads, tranquillity and nearby settlements. The present uncertainty reinforces those concerns because it is not yet clear whether the assessed scheme, the land powers sought and the deliverable interface solution are the same thing.

4. Requests to the Examining Authority

The Parish Councils respectfully request that the Examining Authority require the Applicant to:

- provide, for every disputed matter in the Tarchon SoCG concerning the EACN, the relevant SoCG topic number, the current status, National Grid's position and Tarchon's position;
- provide a final interface plan or schedule identifying, for Tarchon, North Falls and Five Estuaries, the coordinates of relevant connection points and bays, responsibility for design and construction, construction party, access route, sequencing assumptions and interaction with the other connecting projects;
- explain, with documentary support where available, how the unresolved NESO and Tarchon matters affect the deliverability and assessed envelope of the authorised development;
- demonstrate whether altered bay locations, cable crossings, access requirements, land take, construction sequencing or responsibility for works could materially change any environmental assessment, cumulative effects assessment, safety assessment, traffic assessment, land powers case or deliverability conclusion;
- confirm whether any further compulsory acquisition or temporary possession powers could be required, and if so explain how that is to be addressed within the present Examination; and
- identify any proposed "no material departure" control, further-assessment mechanism or equivalent requirement to ensure that final interface arrangements cannot move outside specified parameters without proper assessment and examination.

5. Conclusion

The Draft SoCG with Tarchon provides important evidence that key EACN interface matters, central to the Norwich to Tilbury Project, remain unresolved. The Parish Councils' position is not that consent is impossible unless every technical detail is fixed. It is that the Examining Authority should not assume that the submitted

assessments remain robust unless the Applicant demonstrates that all credible interface outcomes fall within the assessed worst case, the draft Order limits, the limits of deviation and the land powers sought.

For Ardleigh and Little Bromley, this uncertainty affects landowners, residents, local roads, cumulative infrastructure pressure, construction disruption, safety, deliverability and confidence in the process. The Parish Councils therefore request that the Applicant be required to provide a clear, documented interface plan and to demonstrate that any unresolved NESO, Tarchon, North Falls and Five Estuaries matters are either fully within the assessed and authorised envelope or are subject to an adequate control and further-assessment mechanism before any recommendation is made.