

**IN THE MATTER OF AN APPLICATION BY NATIONAL GRID
ELECTRICITY TRANSMISSION FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE NORWICH TO TILBURY PROJECT**

PINS REF: EN020027

Deadline 2 (12th March 2026)

Comments on Behalf of

Ardleigh Parish Council

and Little Bromley Parish Council

Introduction

1. These comments have been prepared on behalf of Ardleigh Parish Council (“APC”) and Little Bromley Parish Council (“LBPC”) (together “the Parish Councils”) in response to the Deadline 1 submissions.
2. In particular, the Parish Councils comments take into account the Deadline 1 submissions provided by Colchester City Council (REP1-158), Essex County Council (REP1-163) and Tendring District Council (REP1-182).

Document 8.4.1

3. In the Parish Councils’ view, the Applicant’s “Comments on Relevant Representations” (Document 8.4.1) adopts a very generalised thematic grouping

and is unhelpful in the way it has sought to present its position. The approach taken by the Applicant is clearly inadequate as a response to the detailed and specific issues raised by the Parish Councils (and others), particularly regarding heritage, BMV, cumulative effects, and the suitability of the EACN site. The Parish Councils support the Examining Authority's ("ExA") direction that the Applicant must provide a further version of 8.4.1.

4. In light of the ExA's response, the Parish Councils intend to respond fully to Document 8.4.1 once it is resubmitted. However, in the meantime it makes a number of observations and comments in what follows.

The Parish Councils' Additional Submissions (AS-064 and AS-065)

5. As the ExA and the Applicant are aware, the Parish Councils submitted two additional submissions which were accepted by the ExA on 29th January 2026:
 - a. AS-064 - Additional Submission on Behalf of the Parish Councils
 - b. AS-065 - Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh
6. The Parish Councils note that in REP1-137, Document 8.4.4 at §1.1.6, the Applicant explains that those submissions remain "under review" and indicates that a response will be provided at Deadline 2. In turn, the Parish Councils will comment on that response once it has been received and considered.
7. The Parish Councils also note that REP1-136, Document 8.4.6 states, in relation to the Parish Councils' response to the Rule 6 letter that the Applicant provides comments on Item 3 only and indicates that it has "no comments on the other points raised."

8. The Applicant’s answer to Item 3 depends on the scoping-stage conclusion (found within APP-296 at §5.7) that fire/explosion risks were not significant. However, the Applicant does not engage with the Parish Councils’ specific concern about local emergency-response capacity and resilience in this clustered infrastructure setting. Further there is no agreed Fire and Rescue Service SoCG position confirming that the Parish Council’s fears are unfounded or can be mitigated (see Table 1.3 of REP1-008 - Document 5.9 Draft Statement of Common Ground – Overview (Clean)). The Parish Council’s position is that it was wholly wrong of the Applicant to “scope out” Major Accidents and Disasters, particularly as this is a key concern for the community and others involved in this examination, and without further engagement of the Fire and Rescue Service.

Relevant Submissions by Local Authorities

9. The Parish Councils note that a number of the concerns raised in their representations are also reflected in the Deadline 1 submissions of a number of local authorities.

Colchester City Council (“CCC”)

10. CCC raises concerns regarding the siting of the proposed EACN infrastructure and the way in which that siting has influenced the alignment of the route and order limits.

11. In particular, CCC states:

“The position of the EACN substation at Ardleigh appears to have been predetermined and this has influenced the alignment of the route and order limits.”
(REP1-158 at §6.3)

12. CCC further highlights potential landscape and environmental impacts associated with the proposed alignment, including impacts on the Dedham Vale National Landscape and surrounding settlements (REP1-158 at §§6.4–6.7).

Essex County Council (“ECC”)

13. The Parish Councils also note the submissions of ECC, sent by Cllr Scott, the Cabinet Member for Housing, Planning and Regeneration. Within that representation, Cllr. Scott emphasises the need to consider alternative transmission solutions, including offshore transmission coordination and alternative technologies.\
14. Cllr Scott also highlights the importance of assessing the combined effects of multiple infrastructure projects affecting Ardleigh (for which read the Ardleigh and Little Bromley Area (“the ALBA”)).

Tendring District Council (“TDC”)

15. The Parish Councils further note the Local Impact Report (“LIR”) submitted by TDC (REP1-182).
16. TDC identifies concerns regarding cumulative infrastructure impacts affecting the district (REP1-182 Section 10)
17. The LIR also highlights potential impacts on heritage assets (Section 15) and landscape character, including the setting of the Ardleigh Conservation Area (REP1-182 Section 20).
18. TDC further identifies potential community and health impacts associated with construction activity and traffic affecting the Ardleigh area (REP1-182 Section 14).

19. In effect, these three submissions help illustrate the Parish Councils' key concerns and lend strong support to the Parish Councils' suggested further ISHs concerning impacts on the ALBA, the assessment of alternatives, as well as costs (as set out in the Parish Councils Deadline 1 comments (REP1-145).

Policy Compliance Tracker

20. The Parish Councils also note the Applicant's Policy Compliance Tracker (REP1-133, Document 8.4.2)

21. That document identifies a number of relevant policy documents, including the updated Dedham Vale National Landscape and Stour Valley Project Area Management Plan and emerging development plan material for TDC and CCC.

22. The Parish Councils consider that these policies underline the importance of careful, and detailed, consideration of landscape setting, cumulative infrastructure effects and the impacts of major energy infrastructure on local communities in and around the ALBA.

Interrelationship with Other Infrastructure Projects

23. The Parish Councils further note the Applicant's Report on Interrelationship with Other Infrastructure Projects (REP1-134 Document 8.4.3).

24. Whilst that report identifies a number of relevant projects and describes engagement with their promoters, it appears primarily descriptive in nature and does not set out any clear strategy for addressing the combined local effects of those projects in the ALBA.

25. The Parish Councils also note that the Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 1 (REP1-139) confirms the central role of the proposed EACN Substation within the wider network strategy (REP1-139 Table 2.1 at 4.1(a)).

26. As stated earlier in these comments, the Parish Councils consider that the cumulative impacts of concentrating infrastructure in this location remain an important issue for the Examination, and one that has not been resolved through this round of submissions. Indeed, the documents produced by the Applicant, again, reinforce the need for an ALBA-specific ISH.

Tree Preservation Orders

27. The Parish Councils note that TDC has recently made a number of Tree Preservation Orders ("TPOs") affecting trees within the ALBA.

28. In particular, the Parish Councils note the following recently made TPOs:

- a. Tree Preservation Order No. 26/00001/TPO – Dead Lane, Ardleigh, Protecting T1–T9 Oak and Group G1–G4 Oak.
- b. Tree Preservation Order No. 26/00002/TPO – Land East of Causeway, Wick Lane, Ardleigh, Protecting T1 Holly and T2–T3 Oak.
- c. Tree Preservation Order No. 26/00003/TPO – Land adjacent Fairhaven and Holly Trees, Wick Lane, Ardleigh, Protecting T1–T12 Oak.
- d. Order served 9 February 2026.

29. These TPOs seek to protect a number of mature oak trees (and in effect associated landscape features) located within areas potentially affected by the proposed development, including locations in the vicinity of Dead Lane and Wick Lane within the ALBA

30. Plans identifying the location of the relevant Tree Preservation Orders are appended to this submission.
31. The Parish Councils invite the ExA to request that the Applicant to confirm whether these recently designated Tree Preservation Orders (26/00001/TPO, 26/00002/TPO and 26/00003/TPO) have now been taken into account and how they are to be addressed through the proposed development..
32. The Parish Councils further note that a number of TPO trees were not identified in the Applicant's arboricultural and landscape assessments.

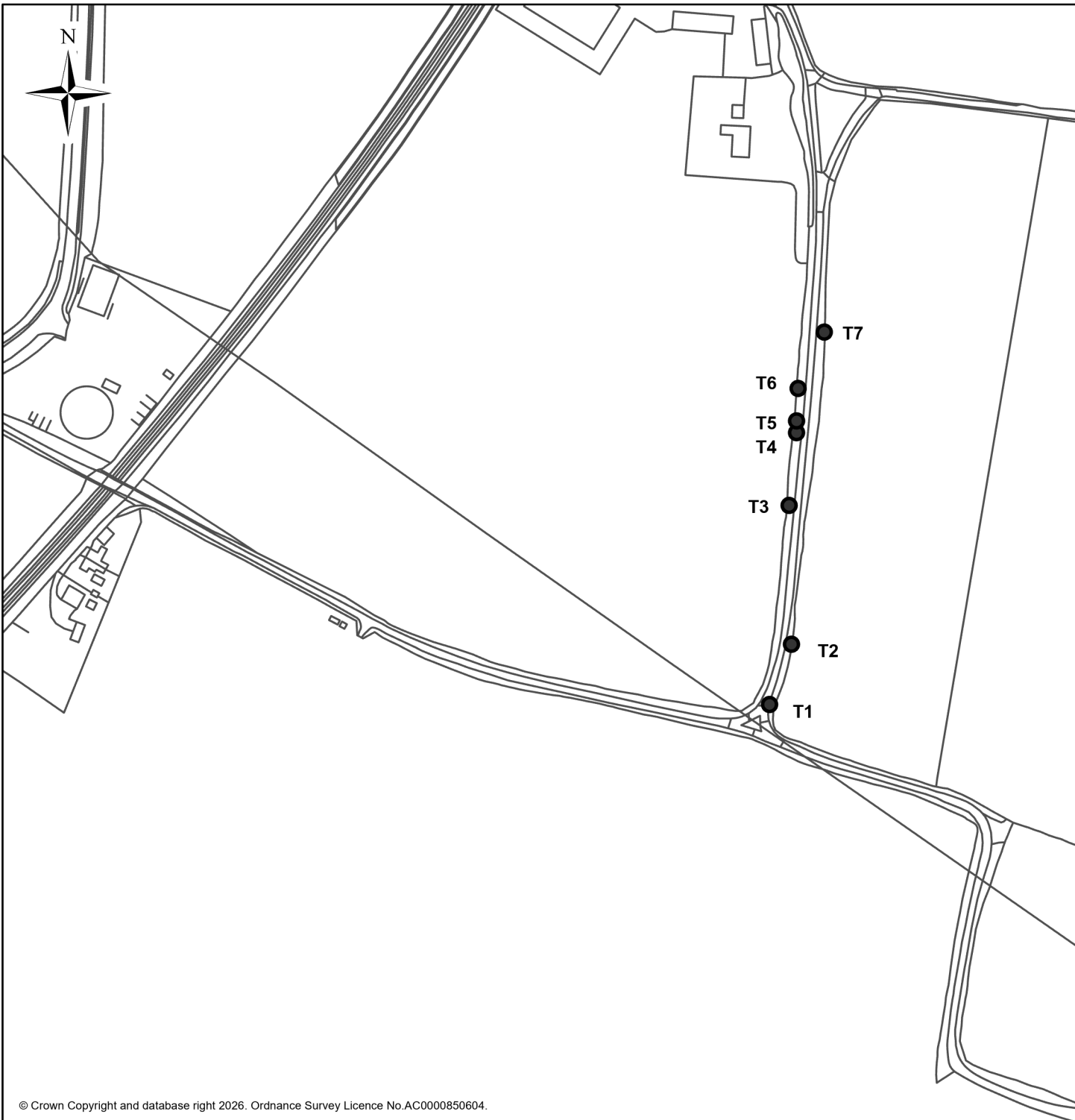
Conclusion

33. The Parish Councils note the Examining Authority's observations to the Applicant regarding the need for detailed responses to location-specific issues raised by statutory consultees and Interested Parties.
34. In light of that correspondence, and the matters raised by the relevant local authorities identified above, the Parish Councils anticipate that the Applicant's forthcoming submissions will provide more detailed responses to the issues raised in AS-064 and AS-065 and related representations
35. The Parish Councils will review those responses once provided and will make any further comments that may be necessary at the appropriate stage of the Examination, including at Deadline 3
36. In closing, the Parish Councils note that, as identified by the ExA, the manner in which the Applicant has presented its Deadline 1 submissions has not assisted clarity or enabled participants in the examination to identify, within the short deadlines, the information required to respond. Relevant material appears to be embedded within extensive prose, opaque tables, and references to earlier

submissions, rather than being set out as clear and direct answers to the points raised.

37. It is partly due to this approach that the Parish Councils' requests for ISHs, as raised earlier in this examination (and discussed above) are maintained. The material provided by the Applicant offers little in the way of answers to the concerns raised by the Parish Councils.

Simon Bell
Cornerstone Barristers
12th March 2026



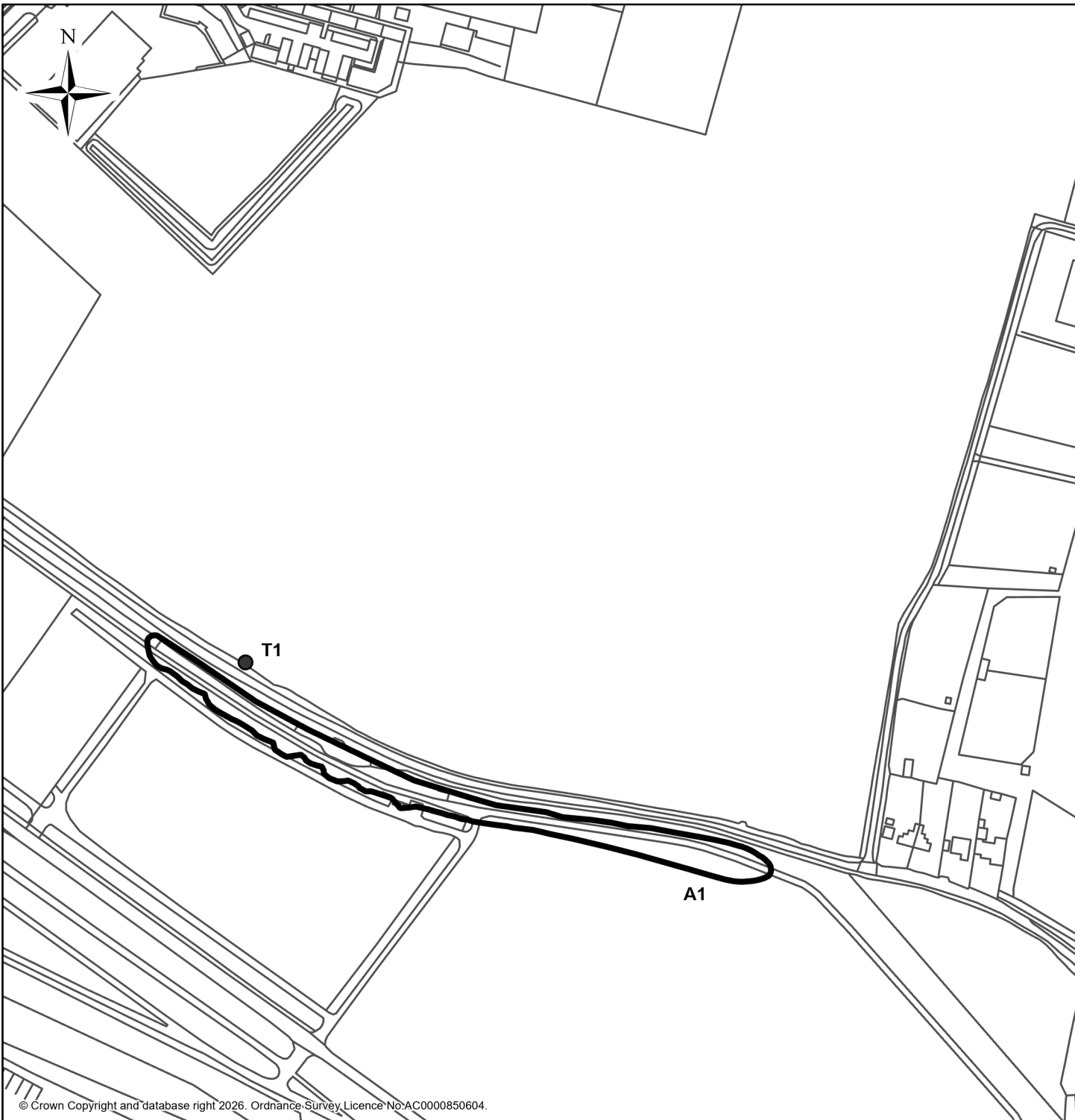
Tendring District Council, Town Hall
Station Road, Clacton-on-Sea,
Essex CO15 1SE

Tree Preservation Order 26/00006

Section: 201

Location:
Home Farm Lane,
Ardleigh

Description:-
T1-7 Oak



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Tree Preservation Order 26/00004

Section: 201

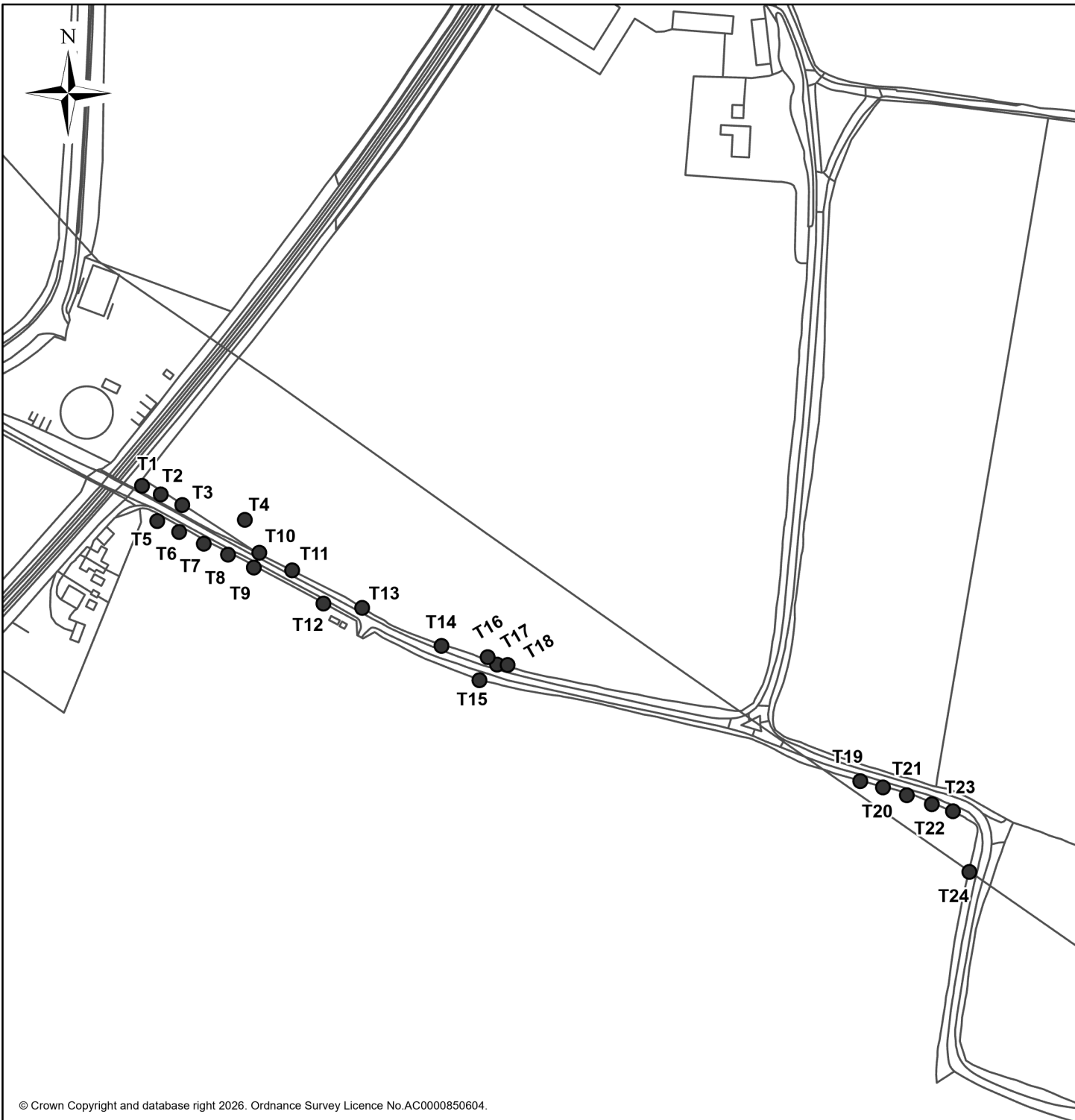
Location:

Wick Lane (western section),
Ardleigh

Description:-

T1 Oak

A1 Oak, Ash, Holly, Hawthorn, Maple



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Tree Preservation Order 26/00005

Section: 201

Location:
Little Bromley Rd,
Ardleigh

Description:-
T1-24 Oak