

DRAFT

Planning Act 2008 – section 61 and section 65

Application by National Grid Electricity Transmission for an order granting development consent for the Norwich to Tilbury project (EN020027)

REGISTRATION AND REPRESENTATION FROM ARDLEIGH PARISH COUNCIL [DATE]

This is the Registration and Representation made on behalf of **Ardleigh Parish Council (APC)** in relation to National Grid's Norwich to Tilbury Project (EN020027).

To be clear, APC understands and supports the need to expand the capacity of the grid network to ensure a sufficient and protected energy supply for the UK. However, APC **strongly objects** to the proposals before the Examining Authority, as the proposals fail to identify the best and least harmful approach to grid expansion. In particular, APC has real and evidenced concerns surrounding the adverse impacts of the proposals upon the Parish of Ardleigh and its setting and surroundings and in particular, to the siting of the **East Anglia Connection Node (EACN)** and associated overhead line and cabling infrastructure.

This representation summarises APC's position as set out in its responses to both the **Statutory Consultation (July 2024)** and the **Targeted Consultation (March 2025)**, as well as its evidence base including the **Ardleigh Neighbourhood Plan (2020–2033)** and the **Tendring District Local Plan¹**. Copies of APC's responses to the July 2024 and March 2025 responses are appended to this Representation, and should be read in their entirety as part of APC's case for objecting. The Examining Authority has already received **APC's Adequacy of Consultation Representation [AoC-024]** and, again, this too forms part of APC's objection.

APC is supported in its objection to these proposals by members of the local community, many of which have contributed to a fund to assist with procuring expert representation for APC during the examination sessions.

1. Summary of Objection

Ardleigh Parish Council objects to the Norwich–Tilbury proposals on the following principal grounds:

1. **The site-selection process for the EACN is fundamentally flawed**, incomplete and inadequately evidenced, including failure to consider lower-cost offshore integrated options
2. **The statutory and targeted consultations failed compliance with the Gunning Principles** and did not allow meaningful public engagement.
3. **The proposals breach multiple Holford and Horlock Rules**, especially **Holford Rule 3**, due to the pylon arc and multiple angle towers encircling the village

4. **The scheme directly conflicts with the Ardleigh Neighbourhood Plan (2020–2033)** and multiple policies of the **Tendring District Local Plan**, undermining the adopted local spatial strategy.
5. **Ardleigh is the wrong location for the EACN**, given its exceptional constraints, heritage designations, landscape sensitivities and proximity to the Dedham Vale National Landscape.
6. **The cumulative impact** of the EACN, multiple windfarm substations, converter stations, pylons and cable swathes would cause unprecedented and irreversible harm to the parish.
7. **Viable alternative solutions, including offshore grid connections and brownfield land options, were not properly assessed or presented for consultation.**

2. Failure of Site Selection – Ardleigh Is an Inappropriate Location

APC maintains that National Grid has not undertaken a credible, complete, or transparent site-selection process. Several technically viable and lower-impact alternatives were not assessed or were dismissed without evidence.

2.1 Failure to consider an integrated undersea/offshore grid option—despite National Grid’s own evidence that it would *save money*

National Grid has publicly acknowledged, through the **ESO Offshore Coordination Project**, **Holistic Network Design**, and multiple **Network Options Assessments**, that an **integrated offshore transmission network** would:

- **reduce total system cost by billions of pounds**
- minimise reliance on inland substations like the EACN
- reduce the need for new pylon corridors
- limit environmental, heritage and residential impacts
- enable faster, strategic decarbonisation

Despite National Grid’s own findings that offshore integration is **cheaper, more efficient, and less harmful**, the Norwich–Tilbury project:

- does **not** assess an integrated offshore option
- does **not** provide a cost comparison
- does **not** explain why a cheaper offshore option was excluded
- forces an unnecessarily complex, expensive inland solution

This omission is a critical flaw. It results in the EACN being placed in Ardleigh **only because lower-cost, lower-harm options were not examined**, contrary to National Grid’s own published analysis.

2.2 Failure to assess brownfield, coastal, or industrial alternatives

National Grid has provided no transparent comparison of:

- coastal brownfield sites
- industrial land near windfarm landfall
- sites closer to the Norwich–Tilbury route
- locations benefitting from existing grid infrastructure

Instead, a heavily constrained rural village has been selected without justification.

2.3 Inadequate appraisal of alternative sites near the main Pylon Route

Only two sites were considered for the siting of the EACN Ardleigh and the former RAF Boxted. Although we don't advocate that the EACN is located at RAF Boxted it does demonstrate the inadequacy of the assessment as RAF Boxted is:

- close to the A12
- adjacent to existing energy and transport corridors
- significantly closer to the core alignment

It was dismissed on vague "balance of considerations," without technical evidence. APC understands that Tendring District Council also challenges this dismissal.

2.4 Failure to follow the established site-selection hierarchy

Best practice for energy NSIPs requires:

1. Considering **offshore** and **HVDC subsea** options
2. Selecting **brownfield or industrial** sites first
3. Only considering **rural greenfield** sites as a last resort

In settling on its proposal, National Grid has reversed this hierarchy.

2.5 Conclusion on Site-Selection Failure

Because National Grid:

- ignored offshore options it previously said would **save money**
- failed to examine brownfield and coastal alternatives
- dismissed local alternatives without justification
- did not follow the siting hierarchy

...the choice of Ardleigh for the EACN is unjustified and unsound.

3. Consultation Failures – Breach of Gunning Principles

APC's assessment concludes that both the statutory and targeted consultations contravened established consultation law:

Gunning 1 – Consultation at a formative stage

Alternative options (including offshore grid, HVDC subsea, alternative landfalls and brownfield sites) were withheld from consultation, meaning the public could not influence fundamental decisions.

Gunning 2 – Sufficient information

Critical environmental, archaeological, heritage and cumulative impact information was missing or incomplete. Maps and documents were very difficult for ordinary people to access and understand.

Gunning 3 – Adequate time

The Targeted Consultation allowed insufficient time for residents and stakeholders to understand and respond to complex new proposals affecting hundreds of hectares.

Gunning 4 – Conscientious consideration

Evidence supplied by APC, including on heritage and landscape harm, was not reflected in subsequent design revisions. Notably, pylon TB6 was moved **closer** to a Scheduled Monument after APC raised concerns about potential harm to the site..

4. Breaches of the Holford and Horlock Siting Rules

The Holford and Horlock Rules constitute the nationally recognised method for assessing overhead line and substation siting. National Grid's proposals in Ardleigh **breach these rules extensively**, especially **Holford Rule 3**, which is breached in the most severe manner possible.

4.1 Holford Rules – Summary of Breaches

Rule 1 – Avoid major areas of highest amenity value

Breach: Line intrudes into the setting of the **Dedham Vale National Landscape**, the Ardleigh Conservation Area and a Scheduled Monument.

Rule 2 – Avoid smaller high-amenity areas or deviate to protect them

Breach: Direct impact on Local Wildlife Sites, ancient hedgerows and heritage settings.

Rule 3 – Choose the most direct line with few angle towers

Severe fundamental breach.

The Ardleigh alignment violates Rule 3 in multiple ways:

Breach 1: Pylons wrapped around the village

More than **10 pylons (TB001–TB021)** form a sweeping **arc** around Ardleigh, resembling a **semi-circle of industrial structures** enclosing the village.

Breach 2: Multiple angle towers in succession

Rule 3 discourages angle towers due to their size and prominence. The Ardleigh design uses multiple angle towers, amplifying skyline intrusion.

Breach 3: Long sections across flat land

Rule 3 warns explicitly that long runs in flat landscapes cause strong visual intrusion. Ardleigh's open topography makes the pylon corridor visible from every direction.

Breach 4: Domination and encirclement of a rural settlement

Holford guidance requires avoiding routes that dominate or pass close to villages. The proposals **encircle** Ardleigh, an outcome entirely contrary to the purpose of Rule 3.

Rule 4 – Use tree or hill backgrounds

Breach: Ardleigh offers no such screening. Pylons stand against open sky.

Rule 5 – Prefer wooded valleys

Breach: Proposals cut across open farmland, increasing visibility.

Rule 6 – Avoid “wirescape” in flat, sparsely treed areas

Breach: Twenty-one pylons, substations, overhead lines and cable swathes create a significant wirescape across Ardleigh.

Rule 7 – Approach urban areas via industrial zones; consider undergrounding

Breach: The approach is through rural land, and undergrounding/offshore alternatives were not meaningfully assessed.

4.2 Horlock Rules – Summary of Breaches

The Horlock Rules require:

- avoiding high-amenity landscapes
- taking advantage of natural landform and vegetation
- minimising visual impact on settlements
- avoiding cumulative industrialisation
- ensuring overhead line connections can be sensitively integrated

Breaches in Ardleigh:

- The EACN is placed in flat, open countryside with no screening.
- It lies near a Conservation Area, Scheduled Monument, Listed Buildings, and Local Wildlife Sites.
- The cumulative impact of the EACN, Five Estuaries, North Falls, Tarchon converter station and 21 pylons is extreme and cannot be reconciled with Horlock principles.

Horlock compliance is **impossible** at this site.

4.3 Conclusion on Non-Compliance with Holford + Horlock

These proposals:

- severely breach **Holford Rule 3**,
- breach Rules 1, 2, 4, 5, 6 and 7,
- and violate nearly **all** Horlock siting principles.

The Examining Authority should give significant weight to these breaches, which show that Ardleigh is unequivocally the **wrong location**.

5. Conflicts With the Ardleigh Neighbourhood Plan and Tendring Local Plan

5.1 Conflict with the Ardleigh Neighbourhood Plan (2020–2033)

The Neighbourhood Plan—developed through extensive consultation and now forming part of the Development Plan—prioritises:

- preserving rural character and tranquillity

- protecting Local Green Spaces
- safeguarding heritage and settlement pattern
- conserving hedgerows, woodland and biodiversity
- avoiding intrusive development

The Norwich–Tilbury scheme directly undermines these objectives and would permanently negate years of community-led planning.

5.2 Conflict with the Tendring District Local Plan

The Local Plan identifies Ardleigh as a **Small Rural Settlement** where only modest, sustainable development is appropriate. Major industrial-scale energy infrastructure is incompatible with:

- policies on landscape protection
- heritage conservation
- agricultural land safeguarding
- rural settlement character

6. Environmental, Heritage and Landscape Harm

APC's submitted evidence demonstrates that the scheme would cause:

- irreversible destruction of ancient hedgerows, woodlands
- harm to multiple Local Wildlife Sites and irreplaceable habitats
- major impacts on migratory birds and bat populations
- serious degradation of views within and toward the Dedham Vale National Landscape
- harm to a Scheduled Monument and numerous non-designated archaeological assets of high potential significance

The proposals also jeopardise Ardleigh Reservoir (a major drinking water source), the settings of Listed Buildings, the Conservation Area, and the historic settlement form.

7. Severe and Unacceptable Cumulative Impacts

National Grid assumes that the following will be co-located around the EACN:

- EACN substation (c. 42ha)
- Five Estuaries substation (c. 20ha)
- North Falls substation (c. 20ha)
- Tarchon converter station
- 19 × 50m pylons 2 x 60m pylons with Haul roads
- 4.5 Km of Underground cabling swathes and access roads up to 220m wide

The affected area exceeds **275 hectares**, representing more than **15% of Ardleigh's unprotected land** and fundamentally altering the parish's identity.

This cumulative industrialisation of a rural landscape is unprecedented and unacceptable.

8. Harm to Agriculture and Rural Economy

- Loss of **best and most versatile agricultural land** (Grades 2 and 3a)
- Severe disruption to farm access, drainage, productivity
- Impacts on horticulture, viticulture, orchards, equine businesses, care homes
- Harm to tourism and recreation (walking, countryside use, fishing, reservoir activities)

9. Viable Alternatives Were Not Properly Assessed

APC continues to call for full assessment of:

- a **strategic integrated offshore grid**
- offshore pooling of windfarm power
- subsea HVDC transmission
- brownfield coastal substations
- relocation of the EACN outside Ardleigh
- HVDC onshore alternatives where necessary

These alternatives offer substantially reduced environmental, social and landscape impact and are more consistent with emerging national policy and the public interest.

10. Requests of the Examining Authority

APC considers that in respect of Ardleigh, the Examining Authority should set time aside for:

- A specific session of the examination dealing with the impacts on Ardleigh, given the cumulative, detrimental effects of what is proposed.
- Undertake a specific site visit at Ardleigh to view the routes of the proposed pylons and underground cabling in real life (rather than just on a plan) and to experience the village and surrounding landscape as it currently exists. APC may be able to facilitate a view from the tower of the Grade II* St Mary the Virgin Church, located at the medieval heart of the village, which provides clear views of the surrounding landscape and the impact that the proposal will have upon it.
- APC has prepared a short video in support of its objection. It would be grateful for directions as to how best to provide that video.
- [HERE, DO YOU WANT TO ASK THE EXA TO REQUEST THE REFERENCING DETAILS FOR THE PLANS?]**

APC considers that the Examining Authority give full weight to:

- the flawed site-selection process
- non-compliant consultations
- breaches of established siting rules
- conflict with statutory planning policy
- demonstrable environmental and heritage harm
- unacceptable cumulative impacts
- availability of viable, lower-harm alternatives

11. Conclusions

For the reasons set out above and in APC's detailed submissions, **APC strongly objects** to the Norwich–Tilbury proposals affecting Ardleigh and urges the Examining Authority to either:

- 1. Recommend a refusal of the DCO, given the clear detrimental impacts posed by the proposed siting of the EACN and associated infrastructure in Ardleigh; or**
- 2. Recommend modifications to the DCO, removing the infrastructure that adversely impacts Ardleigh. Such a course of action will presumably require National Grid to advance alternative routes, sites and/or methods for expanding the grid.**

Ardleigh Parish Council