Ardleigh Parish Council

Response to Tarchon Non-Statutory Consultation

April 2025

Introduction

We are opposed to the scheme which would connect to infrastructure including the National Grid (NG) East Anglia Connection Node (EACN), proposed, but not yet consented for Ardleigh. We would draw attention to previous responses to National Grid consultations which give details of the harms faced by Ardleigh should the scheme go ahead. We also have serious concerns about the inadequate site selection process for the EACN which should cast doubt on whether it will be approved.

We endorse the opposition from Tendring District Council for the Tarchon proposals including that the application relies on a connection to the EACN the site selection of which has serious and overriding flaws. Also, that the application is premature given the status of the NG application (and the strong objections to the same) and the landscape impact and other harms to the setting of the National Landscape.

You will be aware that there are a range of major projects proposed which would have devastating cumulative impact on the area and there is clear interdependence between the different projects of which Tarchon is one:

We estimate that at least 260 hectares of the Parish and immediate surrounding area could be at risk. Ardleigh is defined in the Census as a rural parish. It has an area of 2040 hectares, of which only approximately 5% is currently built upon. Further, there is in the region of 100 hectares of surface water, including Ardleigh Reservoir and Salary Brook, as well as several fishing lakes and irrigation ponds. A further 50 hectares is protected as green space, Scheduled Monument and Site of Special Scientific Interest. We estimate that land take for the pylon and underground cable swathe, National Grid EACN, Five Estuaries and North Falls substations and Tarchon converter station, would be in excess of 275 hectares. **This is more than 15% of the unprotected land area of the Parish.**

Converter Station Location

The location proposed for the Tarchon converter station is totally unsuitable.

The "*converter search area*" outlined in the consultation documentation is a region of unspoilt countryside with the highest grade (BMV) farmland. Noting the huge scale of the converter building and the plateau landform on which it would be situated, the structure would be highly visible over a very large area. It would be impossible to screen by natural means (such as trees and hedging). The area is also well known for its valuable heritage assets.

At a briefing meeting with Parish Council representatives in Ardleigh held on 17 March 2025, Tarchon representatives acknowledged the potential for significant problems with drainage in the area. These issues are echoed by local farmers, who are aware of the extensive harm to the land that can easily be caused by disruption to the existing complex drainage systems, as these are sometimes ancient in origin.

Further constraints are highlighted by Tarchon in the presentation document from the briefing meeting held in Ardleigh on 17 March 2025, where it refers to the "complex" landfall site selection work and the "complex and extensive offshore constraints". Constraint complexity inevitably results in unacceptable compromises being made and should instead point to alternative solutions being explored.

This infrastructure should be located on a brownfield site, which is ideally in a coastal location. It is noted that in relation to the NeuConnect Interconnector, which has been referenced by Tarchon due its shared association with Volta Partners, the UK converter is in fact located on a brownfield site in a coastal location on the Isle of Grain. Options for potential brownfield sites in Essex could include Bradwell (where there is redundant electricity infrastructure that could be replaced) and Tilbury.

Further, we feel strongly that all offshore options should also be actively considered, and pressure brought to bear on Government and regulators for improved co-ordination and collaboration. Noting that this project is at a very early stage in the planning process, we would like to see Tarchon show leadership in this area by creating some of the building blocks that will ultimately form the basis of an integrated offshore grid

Cumulative Impact

Of great concern is the cumulative impact of both consented and proposed projects in the area. This includes, but is not limited to:

- Tarchon Interconnector HVDC converter and cabling
- NGET Norwich to Tilbury, including the EACN substation and substantial overhead and underground cabling
- North Falls Windfarm substation and cabling
- Five Estuaries Windfarm substation and cabling
- 50MW Battery Energy Storage System on land adjacent to Lawford Grid Substation
- Proposed sites for minerals extraction

The impact of the proposed energy infrastructure projects is exacerbated by the very low level of coordination between the offshore projects, despite the National Policy Statements strongly advocating this. For example, Five Estuaries and North Falls are proposing to individually bring the power ashore as HVAC, requiring 12 separate onshore power cables. This is substantially more damaging than the 2 cables required

for a HVDC equivalent system where the power is pooled offshore. This was demonstrated to be a technically viable element of the solution presented in the OCSS feasibility report, even though the overall scheme was deemed unviable due to the connection into Sea Link. As it stands, the addition of the Tarchon interconnector cables to the windfarm cabling would therefore result in a total of 14 large cables traversing the Tendring peninsular, due to the individual radial connections. This is widely acknowledged to be the most damaging form of infrastructure.

The benefits of offshore coordination relative to individual radial connections are well known. For example, the key study by ESO (now NESO) from 2020 demonstrated benefits in a wide range of areas and these were particularly marked in relation to environmental impacts, social & local impacts and cost:
https://www.neso.energy/document/182936/download

Co-ordination of the proposed infrastructure should be fully explored. This should include the use of Offshore Hybrid Assets (OHAs), which have now gained Ofgem approval. It is noted that this approach has been adopted for the Nautilus and LionLink interconnectors. Tarchon should be fully exploiting the latest developments.

It is also essential that at a very early stage a detailed Cumulative Effects Assessment is carried out, such as that recommended for Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008.

https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment

Consultation Process and premature application

Councillors present at the briefing meeting held with Tarchon on 17 March 2025 did not feel that it was a genuine attempt to consult.

Very little information was available and options for different alternatives were not presented. The only available scope for input appeared to be the fine details of a largely predetermined solution. The tone also appeared to be to accept the inevitable (which we do not accept). For example, it was suggested that as the EACN would have capacity to have three connections if Tarchon had its connection elsewhere it would quickly be replaced by another provider. We disagree with the location of the EACN and will continue to argue against it at the DCO stage (and beyond).

Additionally, your consultation booklet contains factual inaccuracies which appear to be designed to mislead the public. As you know National Grid is still in the consultation and pre-submission phase of its Development Consent Order (DCO) application and is not expected to submit its application to the Planning Inspectorate until late summer. We and other local Parish Councils as well as Tendring District Council continue to object to National Grid's EACN in the strongest possible terms. This consultation (and

the applications of the two offshore windfarms offered a connection to the EACN) is premature given that there is no consent for the EACN at the present time, and strong arguments against it being sited in Ardleigh. In what other areas of planning would an application for a structure wholly dependent on another larger structure be considered? It is akin to *putting the conservatory before the house*!

Allowing only 4 weeks for submitting responses is also not helpful. As Tarchon will be aware this overlapped with the NGET Norwich to Tilbury Targeted Consultations and the North Fall DCO Examination, plus of course regular parish council business.

The submission deadline is also only 3 weeks after the public information event held in Ardleigh (17 March 2025) and the meeting that Tarchon held with the parish council immediately prior to this to introduce the project. Please note that at the time of writing, the detailed notes taken by Tarchon at the Ardleigh meeting have not been received. [The meeting notes were subsequently received at 5:15 pm on Friday 4 April 2025. The size of the document and the imminent consultation deadline meant that it was too late to reference the document in our response.]

Conclusions

We strongly urge Tarchon to actively pursue with NESO a much less harmful connection option, noting that the Nautilus interconnector has recently been moved from a greenfield site in Suffolk to a brownfield site on the Isle of Grain in Kent.

This should:

(a) prioritise a location situated away from valued countryside and agricultural land
(b) involve less damaging options such as Offshore Hybrid Assets or High Voltage Direct Current (HVDC) undergrounding to reduce the total amount of infrastructure needed.

At a time when the value of nature, heritage assets and food security is being increasingly realised it is not acceptable to pursue solutions that cause more harm than is absolutely necessary.

We would urge Tarchon to seek an alternative connection which bypasses the Tendring peninsular and does not rely on the EACN in Ardleigh as its grid connection. Relying on the EACN is arguably foolhardy given that it does not yet have planning consent, hence this consultation is premature.

We confirm that we remain willing to engage with Tarchon and would expect meaningful engagement and consultation with our residents and our Parish Council irrespective of how the project develops.

Ardleigh Parish Council
April 2025