

Deadline7 Submission – Community Engagement and Public Information

Submitted on behalf of Ardleigh and Little Bromley Parish Council

Norwich to Tilbury Project: Community Engagement and Public Information EN020027-003833

Ardleigh and Little Bromley Parish Council recognises the strategic need for the Norwich–Tilbury reinforcement project. However, its primary position remains that the siting of the East Anglia Connection Node (EACN) at Ardleigh and Little Bromley has not been adequately justified. Communication measures cannot cure an inadequately justified siting decision or substitute for avoidance and reduction of harm. Without prejudice to the Councils' case on siting, effective parish-specific communication must be secured if consent is granted.

The mitigation hierarchy requires avoidance and reduction of harm to be considered at an early stage. Alternatives and mitigation are not, however, rigid sequential stages in every case. The point for present purposes is that communication and complaints arrangements must not be treated as a substitute for a properly reasoned siting decision. If the EACN remains proposed at Ardleigh and Little Bromley, Appendix E must be strengthened so that engagement, reporting and escalation arrangements are specific to the parishes most directly affected by the project's largest single construction element.

The Applicant's Case (as presented in Appendix E)

Appendix E proposes route-wide engagement measures, including a community relations team, project website, hotline, email and freepost address, site boards, land and property engagement, accessible communications, a complaints process and general information about electromagnetic fields (EMF). Those provisions are too generic for Ardleigh and Little Bromley. In particular, Appendix E does not identify a parish-level liaison route for the EACN; does not require phase-specific briefings tied to the intensity of construction activity; does not require immediate notification of serious incidents, route breaches, unplanned out-of-hours working or material exceedances; does not provide parish-level publication of anonymised complaints and compliance information; and does not secure accessible site-specific EMF information and commissioning results for the affected community.

The Councils' Concerns

The EACN would involve multi-year heavy works, high HGV volumes, noise, dust, vibration, lighting, land take, landscape change and highways coordination. Ardleigh and Little Bromley therefore require engagement proportionate to that impact. The

arrangements should include a named liaison officer; briefings at a frequency linked to the relevant construction phase, with more frequent briefings during peak EACN activity and reduced frequency when works are limited; weekly forward-look bulletins during active construction; immediate incident notifications; joint traffic communications with Essex County Council; and clear routes for escalation where commitments are not being met.

Complaints and Electromagnetic Fields information

The complaints process must distinguish between acknowledgement, investigation, interim response, resolution and escalation. A 48–72 hour final resolution will not be realistic for every complaint, particularly where technical investigation or third-party input is required. However, acknowledgement and initial action within 48–72 hours is both realistic and necessary for construction-intensive parishes. Appendix E should therefore require prompt acknowledgement, identification of the investigation route, an interim response where resolution is not possible within the initial period, a clear target for final resolution, and escalation to a senior project contact where complaints are repeated, unresolved or concern serious impacts.

The Councils also request parish-level publication of complaints and compliance information in anonymised form. That publication should identify complaint categories, response times, outcomes, repeat issues, route breaches, material exceedances and any corrective action taken. The Applicant should also be required to notify the Councils immediately of serious incidents, HGV route breaches, unplanned out-of-hours working and material exceedances of agreed controls or limits.

EMF should be addressed carefully. The Councils do not suggest that compliance with applicable exposure standards is irrelevant, nor do they seek to imply an unproven health effect. The concern is that understandable public anxiety requires clear, accessible and site-specific information. Appendix E should therefore commit to EACN-specific EMF information, public explanation of the applicable exposure standards, and publication of relevant commissioning results in a form capable of being understood by residents.

Policy, Alternatives and Mitigation

NPS EN-1 and EN-5 require community impacts to be minimised, information to be clear and accessible, engagement to be effective, and alternatives to be properly considered. For Ardleigh and Little Bromley, the alternatives assessment remains central to the Councils' case. The Applicant should not rely on communication or construction mitigation as if those measures could themselves justify the Ardleigh and Little Bromley siting. The proper question is whether less harmful options have been fairly assessed, and whether any residual harm at Ardleigh and Little Bromley is then reduced, managed and reported transparently.

The Councils maintain that the Applicant must demonstrate that it has properly assessed alternatives capable of avoiding or reducing harm, including locations closer to existing substations, areas with lower residential density, coastal or offshore connection points, and sites with better road access and lower landscape sensitivity. Those options may materially reduce landscape and visual harm, traffic pressure, cumulative infrastructure effects and community disruption. The assessment must be transparent and comparative, not replaced by general assurances about communication or construction management.

If consent is granted with the EACN at Ardleigh and Little Bromley, the relevant mitigation and engagement arrangements must be secured in an identified management plan or DCO commitment. They should not be left as narrative assurances in Appendix E. The secured commitments should include parish-specific engagement, the complaints stages identified above, phase-specific briefings, weekly construction updates during active works, Essex County Council highways coordination, immediate notification of serious incidents and material exceedances, accessible site-specific EMF information, publication of commissioning results, and transparent reporting of compliance and incidents.

Conclusion

Ardleigh and Little Bromley Parish Council's primary position is that the siting of the EACN at Ardleigh and Little Bromley has not been adequately justified and that less harmful alternatives must be transparently assessed. Communication measures cannot cure that deficiency. If, however, consent is granted, the Applicant must be required to secure parish-specific engagement, complaints, incident-notification, compliance-reporting and EMF-information commitments that reflect the scale and duration of the impacts on Ardleigh and Little Bromley.

The Councils therefore request that the Examining Authority require Appendix E, or another identified certified document or DCO commitment, to be amended so that these obligations are expressly secured, enforceable and tailored to the parishes most directly affected by the EACN.