

Deadline 7 Submission: Environmental Statement

Norwich to Tilbury Project – Environmental Statement EN020027-003941 and EN020027-003942

Submitted on behalf of Ardleigh Parish Council and Little Bromley Parish Council

Ardleigh Parish Council and Little Bromley Parish Council submit this joint summary to highlight continuing concerns about the proposed East Anglia Connection Node (EACN), including its siting, access arrangements, heritage implications and cumulative impact. The Councils consider that the Applicant's assessment does not yet distinguish with sufficient clarity between the existence of archaeological remains, their heritage significance, the anticipated magnitude of impact upon them and the resulting assessed effect. The Councils' concern is not that the mere presence of remains automatically produces a significant effect, but that the Environmental Statement should explain, with local specificity, why the assessed effects are said to be acceptable and how residual risk will be controlled.

Purpose and Overall Position

The Environmental Statement confirms that the EACN and associated works sit within a sensitive historic environment, not a blank agricultural landscape. The impacts extend beyond the substation footprint to underground cable works, pylons, haul roads, compounds, attenuation and drainage works, access and bellmouth works, highway mitigation and rural lanes. The Councils submit that these combined effects require a clearer, asset-by-asset explanation of the baseline relied upon, the significance attributed to identified remains and historic landscape features, the magnitude of impact from each relevant work activity and the consequential effect after mitigation.

Key Concerns

1. Heritage sensitivity and confirmed archaeology

Ardleigh is identified as part of an important multi-period archaeological landscape. The Scheduled Monument referred to in the Environmental Statement should be checked against the official list entry, including its correct name and list-entry number, as the current formatting appears uncertain. The Councils understand the relevant cropmark complex south of Ardleigh to include Bronze Age funerary activity, Iron Age settlement evidence and extensive Romano-British occupation. Chapter 11 also identifies Site 01 as covering the new EACN Substation and associated works east of Ardleigh and north of Little Bromley Road. The Environmental Statement should give the precise Chapter 11 paragraphs, gazetteer entries, trench references and figure references for the archaeological evidence relied upon. Trial trenching is said to have revealed four phases of activity, including Bronze Age, Iron Age, medieval and post-medieval features. That evidence demonstrates the existence of remains and requires a clear explanation of

their significance, but it should not be treated as a substitute for the separate assessment of magnitude of impact and resulting effect.

2. Cropmarks, possible Roman road evidence and wider historic landscape

The EACN geophysical survey identified former field boundaries, possible enclosures, trackways and a geophysical interpretation of possible Roman road evidence. Unless and until confirmed by excavation, that evidence should be described as an interpretation rather than as established Roman road remains. The priority survey corridor from the River Stour valley to the EACN extends for more than 10 km and includes cabling, pylons, compounds, SuDS basins, crossings, attenuation and temporary haul roads. The cropmark complex south-south-east of Ardleigh and south of Little Bromley Road should therefore be assessed as part of a wider historic landscape. The Environmental Statement should make clear which works threaten which features, including substation foundations, cable trenching, drainage, access works, compounds, landscaping and temporary construction activity.

3. Little Bromley access, protected lanes and rural character

Little Bromley Parish Council remains concerned that the EACN access strategy places disproportionate construction and operational burden on narrow rural lanes. The Environmental Statement identifies protected lanes of medieval date within Section C, but the Councils ask that each relevant lane be identified by status, location and relationship to the proposed access works. The heritage harm relied upon should also be explained with precision: for example, whether it arises from widening, bellmouth construction, traffic intensity, HGV movements, permanent access alterations, loss of historic alignment, erosion of rural character or cumulative change in the setting of the lanes. For Ardleigh and Little Bromley, these lanes are part of the historic rural landscape and should not be treated simply as construction routes.

4. Little Bromley War Memorial vibration risk

Chapter 11 identifies Little Bromley War Memorial as the historic structure with potential for damage from construction vibration. The Councils maintain their concern that this sensitive community heritage asset should be protected by enforceable pre-construction condition surveys, vibration limits, monitoring requirements, halt-work procedures and repair obligations. The detailed vibration controls are addressed in the Councils' noise paper and are not repeated here.

The Councils' criticisms should be understood as distinct. The Examining Authority is asked to require the Applicant to clarify whether it says the baseline is complete, whether the significance of identified remains and historic landscape features has been correctly characterised, whether the magnitude of impact from the EACN and associated works has been properly assessed and whether the proposed mitigation is

sufficient. Those questions should not be elided: an adequate baseline does not necessarily answer significance; an acknowledged impact does not necessarily establish its magnitude; and a proposed mitigation strategy does not itself demonstrate that the residual effect is acceptable.

5. Cumulative infrastructure burden and alternatives

Ardleigh and Little Bromley are now facing a growing concentration of energy infrastructure, including the EACN, Five Estuaries substation, North Falls substation, Tarchon interconnector, the existing Little Bromley substation and an approved battery storage facility. The Councils submit that cumulative effects on heritage, landscape character, tranquillity, rural identity and community cohesion have been materially underestimated. The Applicant has not provided a sufficiently transparent comparative appraisal of reasonable alternatives to the EACN location, design and access arrangements, including opportunities to reduce, relocate or consolidate impacts.

Requested Examining Authority Actions

1. **Require a full and transparent alternatives appraisal** for the EACN siting, layout, access strategy, construction compounds and phasing, including clear evidence of why less harmful options were rejected.
2. **Require an enhanced heritage assessment for Section C**, explicitly addressing the Ardleigh archaeological complex, the wider prehistoric and Romano-British landscape, cropmark evidence, the geophysical interpretation of possible Roman road evidence, protected lanes and the distinction between baseline, significance, magnitude of impact and resulting effect.
3. **Require concrete archaeological controls before irreversible works**, including an agreed written scheme of investigation, evaluation before irreversible works, archaeological presence during specified works, stop-work and notification procedures, authority for the relevant approving body to require further investigation, publication and archiving obligations and clear treatment of unexpected remains. The role of local archaeological advisers should be defined as approval and consultation input through those controls, rather than by reference to undefined “effective control”.
4. **Require a formal cumulative infrastructure assessment** covering existing, consented and proposed energy projects affecting Ardleigh and Little Bromley, including the EACN, Five Estuaries, North Falls, Tarchon, the existing Little Bromley substation and the approved battery storage facility.
5. **Require enforceable traffic, lane protection and community safeguards**, including rural lane protection, construction phasing, HGV management, protected-lane controls, and cross-referenced vibration controls for Little Bromley War Memorial as set out in the Councils’ noise paper, together with ongoing community engagement.