

**IN THE MATTER OF AN
APPLICATION BY NATIONAL GRID ELECTRICITY TRANSMISSION PLC FOR AN
ORDER GRANTING DEVELOPMENT CONSENT FOR THE NORWICH TO
TILBURY PROJECT
PINS REF: EN020027**

**FURTHER COMMENTS ON THE APPLICANT'S DEADLINE 7 MATERIAL
ON BEHALF OF ARDLEIGH PARISH COUNCIL AND LITTLE BROMLEY PARISH
COUNCIL**

4 AUGUST 2026

Introduction

1. These comments are confined to what the Applicant's Deadline 7 material adds to the evidential position. They do not repeat the Parish Councils' closing submissions and do not invite the Examining Authority ("ExA") to reopen matters already examined. The narrower issue is the weight which can properly be attached to the Applicant's latest design, mitigation and control case. [REP7-477; REP7-479–REP7-484; REP7-535; REP7-106]
2. The material contains useful clarification, further mapping and additional proposed mechanisms. It also confirms that important matters at Ardleigh and Little Bromley remain dependent upon detailed design, later approval, third-party agreement, implementation or monitoring. Those qualifications do not make the material irrelevant. They do affect what it proves and the weight it can bear. [REP7-477; REP7-482, Appendix A; REP7-483; REP7-535]

3. The relevant distinction is between mitigation which is now defined and secured, and mitigation whose form, location, delivery partner or performance remains to be determined. A later approval process may be legitimate, but it cannot be treated as though it has already delivered the most favourable possible outcome. This comments addresses that distinction, not the merits of the Project afresh. [REP7-477; REP7-481; REP7-482; REP7-484]

Continuing refinement of the Applicant's case

4. Deadline 7 does not present a single settled design and mitigation package. REP7-477 develops the account of co-ordination with adjacent projects; REP7-481 and REP7-482 respond to matters raised during the Examination; REP7-483 provides new Year 15 significance mapping; and REP7-535 identifies broad areas in which compensation, offsetting or enhancement might be pursued. Each document has a distinct and limited function. [REP7-477; REP7-481–REP7-483; REP7-535]
5. The timing is not, by itself, a reason to reject the material. It does require the ExA to distinguish clarification from evidence showing that an assessed effect has changed. In responding to REP6-133, the Applicant relies principally upon EN-5's starting presumption, earlier assessments and unchanged significance categories. It does not provide the requested location-specific comparison between continued undergrounding, the selected overhead alignment and feasible rerouting, or identify the threshold which fixed the transition point. [REP7-481, Table 2.1, response to REP6-133, pp. 3–12]
6. The same response says that Scenario B produces similar broad effects, while individual pylon positions, spans, access, vegetation loss and receptor relationships remain for detailed design. It also relies upon project-wide viewpoints and earlier heritage work rather than supplying the particular visual evidence sought for Ardleigh. Those maintained conclusions are relevant, but do not demonstrate that the alternatives are environmentally equivalent or that harm has not moved between receptors. [REP7-481, Table 2.1, response to REP6-133, pp. 5–12]

7. On cumulative effects, REP7-481 relies upon the anticipated completion of the Anglian Water pipeline and maintains its position despite identified significant cumulative construction effects with the SRC asphalt plant. Unless the present completion and restoration position, and the practical response to the significant effect, are established, the reply does not show that the local cumulative position is less harmful than previously assessed. [REP7-481, Table 2.1, response to REP6-133]
8. REP7-479 and the tracked version at REP7-480 likewise record the Applicant's maintained answers to the ExA's first written questions. They are useful in identifying the controls and processes relied upon, but should be weighted by reference to the underlying evidence and the degree of definition of the proposed control. The tracked document is not a separate evidential advance. [REP7-479; REP7-480]

Integration of the EACN

9. REP7-477 gives a fuller account of the relationship between the East Anglia Connection Node ("EACN"), the North Falls and Five Estuaries substations and other infrastructure. It confirms genuine co-ordination on siting, access, landscape interfaces, drainage and operational matters. That progress should be acknowledged. The same document also identifies the limits of the integration presently achieved. [REP7-477, sections 3 and 7 and Appendix B]
10. The Joint Substations Design Guide is directed to the North Falls and Five Estuaries substations. The Applicant states that its design considerations are specific to that site and do not apply to the EACN. The EACN remains subject to National Grid's own design process and technical requirements, with review and liaison rather than a single design code governing the whole cluster. [REP7-477, para 7.1.8 and Appendix B]
11. That distinction matters. Co-ordination can reduce conflict, but it does not guarantee one coherent built and landscape outcome. The Applicant explains that safety and technical requirements may constrain common colours or materials. The ExA must therefore

consider the combined experience of the infrastructure, not assume integration from the existence of parallel design processes. [REP7-477, Appendix B, responses concerning design approach, colour and materials]

12. The position on the shared haul road is similarly qualified. The Applicant cannot presently rely upon the North Falls or Five Estuaries haul road because timing, availability and operational arrangements are not confirmed. Commitment T13 requires later consideration of shared use. It does not establish that the road will be available or that the environmental advantages of sharing will be achieved. [REP7-477, para 3.2.10]
13. Landscape and drainage interfaces remain for detailed design. Planting must accommodate outgoing cable routes and safety constraints. A necessary drainage easement north of Ardleigh Road was not shown in the Joint Design Guide masterplan. Continued liaison is proposed, but the omission and the unresolved cable interfaces mean that the location and extent of effective planting are not yet fully demonstrated. [REP7-477, para 3.2.12 and Appendix B]
14. Tarchon adds a further qualification. Its converter station is expected to connect to the EACN and is likely to be located in the same area, but no indicative planting proposals were available. A cumulative assessment may use reasonable assumptions; it cannot demonstrate the final combined landscape outcome where the form and mitigation of a material part of the cluster remain unknown. [REP7-477, interrelationship and mitigation material concerning Tarchon]
15. The fair conclusion is therefore that co-ordination is continuing, not that integration is complete. Future forums, liaison and project-specific control documents are relevant safeguards. They do not bring the EACN within the adjacent substations' design guide, settle shared haul-road use, determine Tarchon's form or fix every cable, drainage and planting interface. [REP7-477, paras 3.1.12–3.1.13, 3.2.10–3.2.15 and 7.1.8]

Landscape mitigation and compensation

16. REP7-535 identifies a broad Ardleigh and Little Bromley opportunity area by reference to parish boundaries and a two-kilometre buffer. It does not identify a particular intervention, land parcel, landowner agreement, delivery date, maintenance obligation or measurable landscape outcome. It should be understood as a strategic opportunity plan, not a detailed mitigation or compensation scheme. [REP7-535, Ardleigh and Little Bromley plan; REP7-482, Appendix A, para A.2.21]
17. That limited function is confirmed by the Applicant. Site-specific measures are not prescribed; landowners had not been consulted about individual proposals; and delivery would require later engagement and agreement. The proposed Article, funding and governance arrangements may provide a route by which measures can be pursued, but they do not establish that land is available or that a defined scheme will be delivered. [REP7-482, Appendix A, paras A.2.6–A.2.20]
18. Most importantly, the Applicant accepts that landscape compensation does not remove or reduce the assessed adverse effect. Offsetting and enhancement are proposed because residual effects remain. Any future local benefit may attract separate positive weight, but it cannot reclassify or discount the landscape and visual harm shown in the environmental assessment. [REP7-482, Appendix A, para A.2.24]
19. Primary mitigation is also subject to practical constraints. The final planting will have to respond to cables, drainage, operational access and safety requirements. Its performance will depend upon what can be planted, where it can be planted, survival and replacement, and the time taken to establish. An illustrative landscape scheme cannot be weighted as though each element is already fixed and deliverable. [REP7-477, section 7 and Appendix B; REP7-106, Table 3.9]
20. The ExA should therefore keep three propositions separate: the assessed residual effect; mitigation which is defined and capable of reducing that effect; and compensation or enhancement which may provide a separate benefit. The Deadline 7 material assists with

each, but does not justify setting one off against another or treating an opportunity area as a secured landscape outcome. [REP7-482; REP7-483; REP7-535]

Long-term effects and monitoring

21. REP7-483 is the clearest new evidence because it maps the Applicant's assessment at Operation Year 15. Figure 8.5.12.1 addresses visual receptor areas and Figure 8.5.12.2 landscape character. The Ardleigh and Little Bromley sheets show significant effects persisting around the EACN and overhead-line corridor after the period allowed for mitigation to establish. [REP7-483, Figures 8.5.12.1 and 8.5.12.2]
22. The figures are expressly high-level and show an approximate extent. Significance may vary within the shaded areas and the mapped edge is not a hard environmental threshold. Subject to that proper caution, the pattern remains material: it is the Applicant's own synthesis of its Year 15 assessment, not a new assessment prepared by the Parish Councils. [REP7-483, notes to Figures 8.5.12.1 and 8.5.12.2]
23. Year 15 is important because the assessment already allows time for planting to mature. Significant effects at that stage cannot be treated simply as early operational effects awaiting ordinary establishment. They represent the Applicant's assessed long-term position after the assumed mitigation has had time to operate. [REP7-483, Figure 8.5.12.1]
24. The Tendring Statement of Common Ground reinforces the point. The Applicant corrected its earlier description for Visual Receptor Area C13 Little Bromley: the cumulative effect during operation and maintenance is major adverse and significant. That correction must be carried into the planning balance and any conclusion about the adequacy of mitigation. [REP7-106, Table 3.11, ID 3.11.5b]
25. Monitoring is therefore substantive, not merely administrative. Tendring questioned whether five years of aftercare is sufficient, particularly for replacement planting and in increasingly dry summers. A five-year commitment may support initial establishment, but it does not by itself demonstrate the performance assumed at Year 15. The gap affects

the confidence which can be placed upon long-term screening and integration. [REP7-106, Table 3.9, ID 3.9.9a; REP7-483]

26. Nor does the compensation mechanism answer that issue. The Applicant separates compensation, offsetting and enhancement from measures which remove or reduce the assessed effect. The Year 15 significant effects must remain on the adverse side of the balance at their assessed significance, even if a future compensation fund is also given positive weight. [REP7-482, Appendix A, para A.2.24; REP7-483]

Deliverability and certainty

27. The EACN operational noise position is a material example of future dependency. The unmitigated assessment predicts a 14 dB night-time exceedance at Bounds Farm. The conclusion of no significant residual effect depends upon substantial attenuation, including 20 dB for transformers and shunt reactors and 14 dB for cooling systems. [REP7-482, response to ISH4 Action Point 20; REP7-106, Table 3.6]
28. The Applicant relies upon Requirement 14, an amended commitment for a detailed operational noise assessment before operation, and post-commissioning verification. It says the necessary measures are standard and readily available. Those are important controls. The present material does not, however, identify the final equipment, layout or achieved attenuation. The residual conclusion remains dependent upon later design and verification. [REP7-482, response to ISH4 Action Point 20]
29. REP7-106 also records Tendring's concern about the use of background sound data from the 2022 Five Estuaries surveys and whether the locations are representative of the precise EACN receptors. This does not displace the Applicant's assessment, but it is another reason not to treat the final operational outcome as already demonstrated. [REP7-106, Table 3.6, ID 3.6.5a and related operational-noise matters]
30. Traffic control provides a similar example. REP7-479 records Police concerns about the Outline Construction Traffic Management Plan, abnormal-indivisible-load movements, notification, resourcing and enforcement. The Applicant relies upon Article 49,

contractual arrangements, later CTMP development and continuing engagement. The issue for weight is that the practical arrangements were still being developed, not that no control exists. [REP7-479, responses to ExQ1 SS 1.4 and TT 1.17; REP7-480]

31. The Applicant's assessment may include traffic from adjacent projects, but modelling overlapping movements is not the same as demonstrating how separate controls will operate on the same rural network. Together with the uncertainty over shared haul-road use, the present material supports caution before assuming the most favourable cumulative traffic outcome. [REP7-477, para 3.2.10; REP7-479; REP7-480]
32. REP7-106 further records potentially permanent, long-term, moderate adverse and significant effects upon the fishing lake north-west of Ardleigh and Ardleigh Caravan and Camping Park. Compensation discussions do not remove those effects from the planning balance. Their acknowledged significance is relevant when assessing how far the latest mitigation package reduces the local burden. [REP7-106, Table 3.10, pp. 125–128]
33. The same Statement of Common Ground records Tendring's concern that separate topic controls may not capture the combined lived experience of traffic, noise, vibration, visual change, access disruption and prolonged construction. Any proposed complaints, monitoring and response arrangements should be weighted according to whether they can identify and address that cumulative local experience, rather than merely record compliance in separate technical disciplines. [REP7-106, Table 3.7 and Table 3.11]
34. REP7-484 shows that the Applicant has used detailed protective provisions, agreements and a tracker for statutory undertaker interfaces. That is relevant evidence of an available delivery discipline. It is also a useful contrast with the less developed, site-specific position for community landscape compensation. The existence of a tracker does not itself secure a landscape outcome for Ardleigh or Little Bromley. [REP7-484; REP7-482, Appendix A]

35. The Parish Councils do not submit that future approval or third-party engagement is impermissible. Their point is that evidential weight should follow present certainty. A requirement with an objective outcome can carry substantial weight. A commitment to liaise, consider, seek agreement or identify opportunities is relevant, but carries less weight when deciding whether a significant long-term effect will in fact be reduced. [REP7-477; REP7-481; REP7-482; REP7-484; REP7-535]

Overall Comments on Weight

36. The material provided by the Applicant at Deadline 7 makes the residual position clearer. It confirms active co-ordination, supplies Year 15 mapping and proposes a route for landscape compensation, offsetting and enhancement. It also confirms separate design regimes, unresolved interfaces, indicative opportunity areas and significant effects which persist after the assumed mitigation has matured. [REP7-477; REP7-482; REP7-483; REP7-535]

37. The latest material should be given weight for what it proves, but no more. It proves that processes exist for continued design and liaison; it does not prove a single integrated EACN design. It proves that future landscape investment may be pursued; it does not prove a site-specific scheme. It proves that the Applicant's Year 15 assessment continues to identify significant effects. [REP7-477; REP7-482; REP7-483; REP7-535]

38. The ExA is therefore invited to ask, for each asserted mitigation or benefit: what is now defined; what is secured; what depends upon another party; what remains for later design or agreement; and whether the Applicant's own long-term evidence nevertheless records a significant effect. That gives the Deadline 7 material fair weight without allowing a process to stand in for an outcome. [REP7-477–REP7-484; REP7-535; REP7-106]

39. For those reasons, Deadline 7 does not materially diminish the Parish Councils' concerns about the effects upon Ardleigh and Little Bromley. It provides a clearer evidential basis for giving substantial weight to the acknowledged long-term landscape and visual harm,

and for treating the less defined elements of mitigation, integration and compensation with corresponding caution. [REP7-106; REP7-477; REP7-482; REP7-483; REP7-535]