

Response to National Grid Document 8.4.12.2 – Response to ISH2 Action Point 27 (Masterplans)

Ardleigh Parish Council and Little Bromley Parish Council maintain that National Grid's response to Action Point 27 is fundamentally unhelpful because it fails to provide the coordinated masterplan requested by the Examining Authority.

The point is not simply that the document is poor or incomplete. It is that the Applicant has failed to comply with the substance of the Examining Authority's request. Action Point 27 required masterplans to be provided, with an agreed position in terms of compensation measures for residual effects on the specified landscapes. The Applicant has instead produced a document whose principal purpose is to explain why such compensation may not be required.

The purpose of Action Point 27 was to understand how the substantial residual impacts of the Norwich to Tilbury Project could be addressed through coordinated landscape and environmental enhancement. That request mattered because this is an area facing permanent landscape change over the long operational life of the Project, together with the cumulative effects of multiple nationally significant infrastructure projects. A coordinated long-term strategy was therefore necessary in order to understand whether meaningful environmental enhancement could offset the permanent change to the landscape.

Instead, the Applicant has produced a document which repeatedly argues that such compensation may not be necessary. Throughout the submission, National Grid emphasises that the Opportunities Plans are illustrative only, are not mitigation, do not demonstrate that compensation is required, are not agreed with stakeholders and may never be delivered. That has an obvious planning consequence. None of the measures identified in the document are secured, deliverable or capable of implementation in their present form, and they therefore provide no mitigation or compensation capable of attracting any meaningful weight in the planning balance.

Consequently, the document fails to answer the question posed by the Examining Authority.

Draft Constraints Plan

Key points for the Examining Authority

- First, the Applicant has not complied with the substance of Action Point 27. The Examining Authority requested coordinated masterplans and an agreed position on compensation measures for residual effects. The

Applicant has instead produced draft constraints and opportunities plans, expressly caveated as illustrative and not agreed.

- Secondly, the measures identified in the Opportunities Plan are not mitigation or compensation capable of attracting weight in the planning balance. They are not secured by the draft DCO, are not supported by landowner agreements, are not funded, are not programmed and are not capable of assured delivery.
- Thirdly, the Applicant's own case is that the opportunities identified would not materially change the Environmental Statement assessment of landscape and visual effects. The document therefore does not demonstrate that the significant residual effects identified during the Examination would be avoided, reduced or compensated for.
- Fourthly, the absence of an agreed position is material. Action Point 27 expressly contemplated agreement on compensation measures. The Applicant's response confirms that no final agreed position has been reached and that further work would be required if any measures were considered necessary.
- Fifthly, the cumulative effects point remains unanswered. The East Anglia Connection Node, North Falls, Five Estuaries and the proposed Tarchon interconnector must be considered together. The Opportunities Plan does not provide a strategic or cumulative landscape response to those combined effects.
- Sixthly, the proposed measures are disproportionate to the magnitude and permanence of the harm. Broad indicative arrows for planting and green infrastructure cannot sensibly be treated as a response to the permanent industrialisation of the rural landscape caused by major electricity transmission and substation infrastructure.
- Finally, the Examining Authority should treat Document 8.4.12.2 as providing, at most, background information. It should not be treated as a coordinated masterplan, as secured mitigation, or as evidence that meaningful landscape compensation exists.

The Parish Council disagrees with the assumption that NG uses as starting point: “Views to the Project from within much of Ardleigh (including conservation area) largely filtered and screened by existing buildings and vegetation”

Draft Opportunities Plan

The Ardleigh and Little Bromley Opportunities Plan is particularly disappointing. It consists largely of broad arrows indicating possible tree planting, hedgerows and green infrastructure, but contains no meaningful explanation of what will actually be delivered, who will deliver it, when it will be delivered, how it will be funded or whether it is even achievable. The Plan bears the hallmarks of a high-level desktop exercise. Several of the proposed enhancement areas are factually inaccurate or incompatible with existing land uses, suggesting that insufficient site-specific assessment has been undertaken. For example:

- One of the arrows claiming to be ‘opportunities for connective green infrastructure enhancements’ goes from a small patch of trees into a commercial greenhouse site.
- Indicates tree and hedgerow planting on land adjacent to scheduled monument site, which is an area APC has previously highlighted to be of high archaeological potential.
- Only highlights one existing water body – Ardleigh Reservoir. It doesn’t for example highlight the reservoir on Little Bromley Road, the Fishing Lake and the new Crown Quarry reservoir (the map should extend further to include this area). These are important parts of the blue-green infrastructure.
- Glebe Corner is shown as 2 areas. Area 1 is partly owned by Essex CC but the area shown extends into a privately owned cultivated field. Area 2 is not Glebe Corner but an entirely privately owned cultivated field on the other side of the road.

The difficulty is therefore threefold. First, there is no strategy: no vision for the affected landscape, no stated objectives, no priorities and no explanation of how the proposed measures would work together as a coherent masterplan.

Secondly, there is no delivery mechanism: no funding, no landowner agreement, no implementation programme, no governance arrangement and no means by which the measures would be secured through the DCO. Thirdly, the factual inaccuracies identified below undermine confidence that the plans have been prepared following any sufficiently detailed assessment of the local area.

The Applicant itself acknowledges that much of the proposed enhancement lies on land outside its control and that no agreements have been reached with landowners. That is not a minor qualification. It means that the proposals are not secured, are not presently deliverable and cannot be treated as measures which would address the identified residual effects. Despite Action Point 27 expressly contemplating an agreed position on compensation measures, the Applicant has not produced an agreed position, nor has it undertaken the collaborative exercise necessary to convert broad illustrative ideas into a deliverable masterplan.

The proposals also bear no relationship to the scale of harm arising from the development. Ardleigh and Little Bromley face the permanent construction of the East Anglia Connection Node, associated 400kV overhead lines, cable infrastructure and the cumulative effects of the adjacent North Falls and Five Estuaries substations and the proposed Tarchon interconnector. Against infrastructure of this scale, the proposed response amounts to nothing more than indicative landscape planting. The proposed measures are wholly disproportionate to the magnitude and permanence of the adverse effects identified during the Examination. The document provides no evidence that such limited measures could in any meaningful way compensate for the permanent industrialisation of the local landscape.

Both Plans

The map used although made so opaque that it is virtually unreadable is also out of date. For example it doesn't show current route of footpath 27. It doesn't give any confidence that this exercise has been taken seriously.

Cumulative Effects

The document also fails to address cumulative impacts. Ardleigh Parish Council and Little Bromley Parish Council have consistently explained that the East Anglia Connection Node, North Falls, Five Estuaries and the proposed Tarchon interconnector must be considered together. While the Constraints Plan identifies neighbouring nationally significant infrastructure projects, the Opportunities Plan does not provide an integrated strategy for addressing their combined effects. It simply reproduces the same project-by-project approach which has characterised the Applicant's cumulative effects assessment throughout the Examination. A genuine masterplan should have considered the landscape as a whole rather than treating individual projects in isolation.

Conclusion

Perhaps most significantly, the document misunderstands the purpose of the Examining Authority's request. The Inspector did not ask whether compensation was justified; that is ultimately a matter for the Examination and the Secretary of State. The Inspector asked the Applicant to prepare coordinated masterplans and seek an agreed position on compensation measures. Instead of undertaking that exercise, much of the document is devoted to explaining why compensation should not be required.

The result is a submission that provides little practical assistance to the Examining Authority or to Ardleigh and Little Bromley. It contains no long-term vision, no deliverable programme, no secured funding, no implementation strategy and no measurable environmental outcomes. It is therefore not a coordinated masterplan in any meaningful sense.

In those circumstances, Document 8.4.12.2 cannot reasonably be treated as the coordinated masterplanning exercise requested by the Examining Authority. It follows that it cannot assist the Secretary of State in determining whether meaningful landscape compensation exists, or whether the identified residual and cumulative effects can be adequately addressed.

For these reasons, Ardleigh Parish Council and Little Bromley Parish Council maintain that Document 8.4.12.2 does not satisfy the intent of Action Point 27 and should not be afforded any weight. The Applicant has not demonstrated how the significant residual and cumulative impacts on Ardleigh and Little Bromley would be effectively addressed, nor has it provided the coordinated, deliverable master planning requested by the Examining Authority.

Ardleigh Parish Council

1/07/2026

A Landscape Too Sensitive for Pylons: The Case for Protecting Ardleigh

Whilst supporting the need for new energy infrastructure, delivery must properly consider less harmful alternatives to overhead pylons. In sensitive rural locations such as Ardleigh, other options, including continued undergrounding, should be fully and transparently assessed before pylons are imposed on the landscape.

This submission asks the Examining Authority to require the least damaging solution for Ardleigh. National Grid has already accepted that the landscape north of Ardleigh is sufficiently sensitive to justify undergrounding; the same principle should be applied before overhead pylons are imposed on the adjoining rural landscape.

National Grid's proposal to reintroduce overhead pylons shortly after the undergrounded Ardleigh section is **inconsistent and inadequately justified**. The landscape around Ardleigh does not suddenly become less sensitive at the proposed transition point; it remains rural, visually exposed and closely connected to homes, lanes, footpaths, farmland, heritage assets and the wider setting of Dedham Vale National Landscape.

National Grid's own reasoning for undergrounding the Ardleigh–EACN section shows that undergrounding is not limited to nationally designated landscapes. It can be justified where the effects of overhead infrastructure impact the Dedham Vale National Landscape. Reference statement by the Applicant at recent Issue Specific Hearing 4: subject Landscape and Visual Effects. Transcript: 00.55.56.07 – 00.57.27.26

That same reasoning should be applied consistently to the rest of the Ardleigh area affected by the proposed re-emergence of pylons: visible from the Dedham Vale National Landscape (see attached map).

The re-emergence of pylons immediately after the undergrounded section is therefore not a coherent landscape-based decision. National Grid has not shown that landscape or residential harm materially reduces at that point, nor that affected Ardleigh receptors have been assessed against the same threshold that justified the adjacent undergrounding.

National Grid's decision establishes three principles: undergrounding is appropriate where landscape harm is severe; long underground sections are feasible; and undergrounding can be justified outside a designated landscape where the evidence supports it.

Those principles should be applied consistently to the local landscape, homes and heritage assets affected by the reintroduction of overhead infrastructure, rather than ending at an arbitrary transition point near Ardleigh.

Ardleigh meets the threshold for continued protection

Ardleigh is not a blank or low-value corridor. It is a settled ancient rural landscape with residential properties, listed buildings, mature hedgerows, woodland, farm businesses, narrow lanes and public views across open countryside and the

Dedham Vale National Landscape. Pylons will be highly intrusive in this setting, particularly where they would be experienced from homes, local roads, rights of way and heritage assets.

The landscape does not suddenly become less sensitive

EN-5 requires a consistent application of the mitigation hierarchy where significant landscape and visual effects arise. If undergrounding is justified between Birchwood Road and the EACN section, then the transition back to the A12, around the village settlement, requires a clear, evidence-based justification. Different standards appear to be applied to parts of the same rural landscape.

Potential change to the Project plan and insufficient assessment

Ardleigh Parish Council understands that the Applicant is also seeking to re-route pylon(s) north of the consented Flying Trade Group warehouse at the junction of Old Ipswich Road and Wick Lane. However, the information currently available does not provide a sufficiently precise or transparent basis for assessment. The exact alignment between T18 and T20 remains unclear, and there is no confirmed information on individual pylon locations, span lengths, access arrangements, construction compounds, vegetation removal or the relationship of the revised route to nearby receptors.

Without this detail, the Examining Authority, residents and other parties cannot properly understand or assess the revised alignment. Clear distances from the Dedham Vale National Landscape, homes, listed buildings and public rights of way, together with verified visual representations, are needed to compare this potential change with the existing proposal, and to determine whether continued undergrounding is the less damaging and a more consistent solution.

Cumulative impacts on Old Ipswich Road, Wick Lane and Harts Lane

There are also serious cumulative impact concerns. The expected Anglian Water pipe between Great Horkesley and Ardleigh Reservoir would pass through the Flying Trade Group land (Old Ipswich Road) towards Dead Lane and the Ardleigh Reservoir pumping station, interacting with the Applicant's project, existing industrial buildings, the SRC mineral extraction site and the proposed asphalt plant on Old Ipswich Road.

Together, these schemes would place unacceptable pressure on Ardleigh's sensitive landscape. The combined effects on the Dedham Vale National Landscape, homes, farm businesses, hedgerows, woodland, protected trees and rural setting that have not been adequately considered.

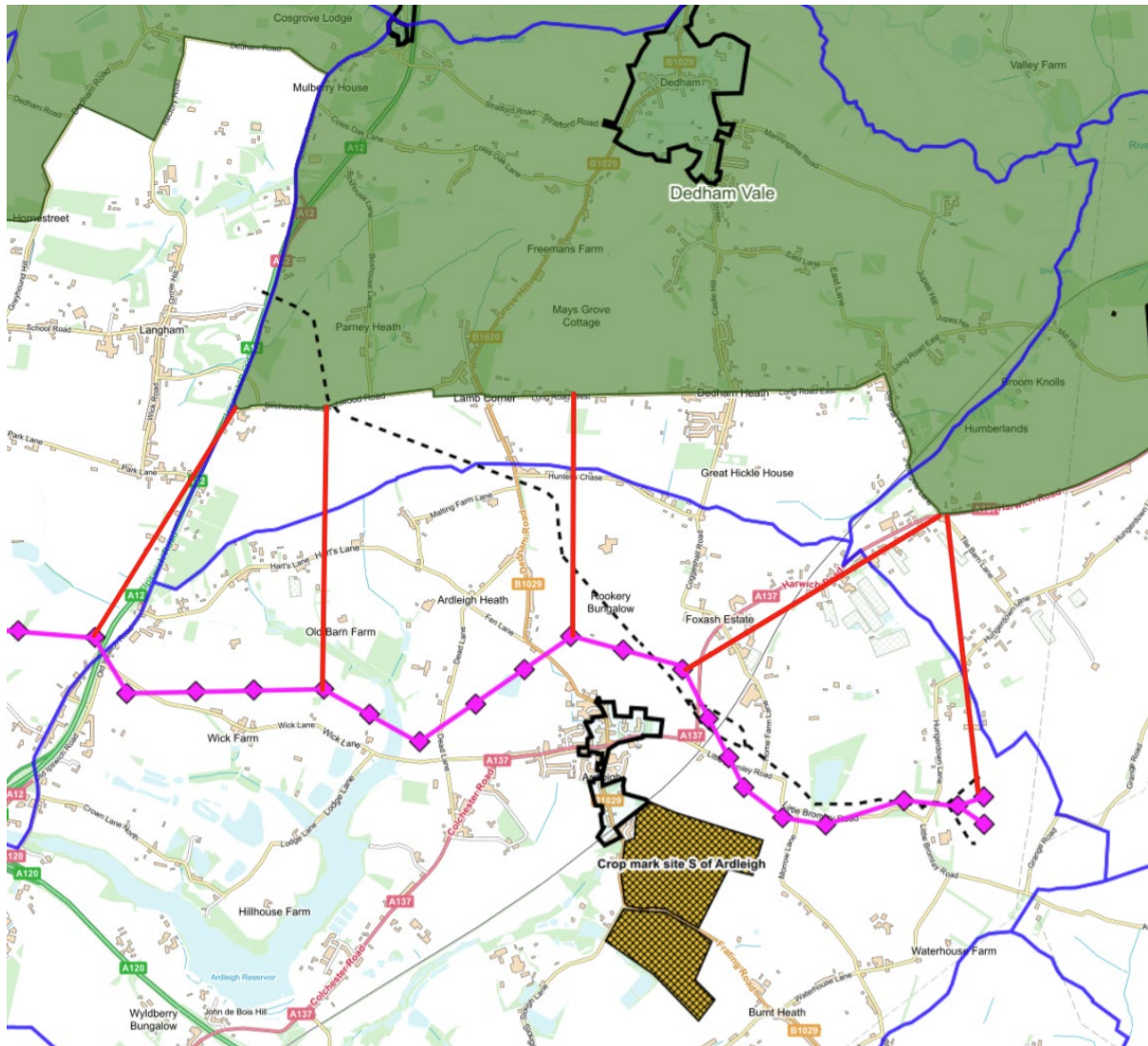
Conclusion and request

National Grid's decision to underground the Ardleigh–EACN section is an implicit, and explicit, admission that this landscape is too sensitive for overhead pylons. The Examining Authority should therefore require National Grid to provide a consistent, policy-compliant approach by avoiding pylons in the Ardleigh area.

In addition, the Examining Authority should require full and transparent assessment of any changes before any reliance is placed upon them, including confirmed pylon

proximity to the Dedham Vale National Landscape, distances to affected homes and heritage assets, updated landscape and visual assessment and a proper cumulative impact assessment alongside other infrastructure and development proposals in the area.

Map showing proximity to Dedham Vale National Landscape. (see below)



Ardleigh Parish Council 29.06.26

Representation: National Grid Norwich to Tilbury Project

This representation concerns the proposed impacts of the National Grid Norwich to Tilbury project on mature trees, hedgerows and associated habitats in and around Ardleigh and Little Bromley. The national need for electricity reinforcement and low-carbon energy is recognised, but this must be balanced against avoidable ecological harm, particularly where mature trees and established hedgerows are affected.

1. Key concerns

In Ardleigh and Little Bromley there are understood to be approximately 95 oak trees subject to Tree Preservation Orders, alongside extensive mature hedgerows. National Grid's proposals indicate the removal of approximately **197** mature trees, with partial impacts on a further **154**. The full species, age class, condition, ecological function and cumulative impact of these losses remain unclear.

Mature oaks, hedgerows, hedge bases, ditches and field margins operate as a connected ecological network. Their loss or fragmentation can reduce habitat continuity and harm nesting, foraging and breeding opportunities for species already under pressure.

2. Planning policy position

Mature oak trees and long-established hedgerows are of exceptional ecological importance because they support complex communities built up over decades or centuries. Their habitat structures, continuity, soils, root systems, dead wood, seed banks and associated species cannot be recreated quickly once lost.

The Examining Authority should therefore test whether the scheme has genuinely followed the mitigation hierarchy: first avoiding harm, then minimising unavoidable harm, then restoring affected habitats, and only as a last resort compensating for residual impacts. Replacement planting should not be assumed to compensate for the loss of mature trees or established hedgerows within any meaningful timescale.

3. Evidence and safeguards requested

National Grid should provide a transparent schedule of all affected trees and hedgerows in Ardleigh, Little Bromley and the wider route, identifying species, age class, condition, Tree Preservation Order status, ecological value, nature of impact and whether each loss is temporary, partial or permanent.

National Grid should also explain, site by site, how the mitigation hierarchy has been applied and why lower-impact alternatives have not been selected where they would avoid or reduce harm to mature trees, hedgerows, ecological networks and rural landscape character.

The following safeguards are requested before any consent is granted:

- A full alternatives assessment, including offshore coordination, brownfield or previously developed land, alternative routeing, adjusted working areas and existing infrastructure corridors.
- Rigorous application of the mitigation hierarchy, with avoidance of harm to TPO trees, mature oaks, veteran or near-veteran trees, important hedgerows, hedge banks and root protection areas.

- Clear arboricultural and ecological justification for every mature tree removal or significant pruning.
- Assessment of hedgerow impacts by ecological function, connectivity and fragmentation, not only by length removed.
- Recognition that mature trees and established hedgerows are effectively irreplaceable where their ecological functions cannot be recreated within a meaningful timescale, with any residual compensation local, additional, measurable, enforceable and secured for long-term management.

The Examining Authority is respectfully asked to give significant weight to the loss and fragmentation of mature trees and hedgerows, require fuller evidence where impacts and alternatives remain uncertain, and secure robust avoidance, minimisation, restoration, compensation and monitoring requirements before any consent is granted.

Ardleigh Parish Council

29.06.26

Response to the Applicant's deadline 5 submissions relating to visualisations

Revision: 1

Date: 6 July 2026

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1. Requests for further visualisations

Procedural history

Action Point 32 from Issue Specific Hearing 2 [EV9-023] states the following:

“Ardleigh and Little Bromley Parish Councils (ALBA) to provide a list of suggested additional viewpoints. Applicant to provide further visuals as necessary at deadline 5 (Wednesday 10 June).”

ALBA responded to this Action Point at deadline 4 (12 May 2026), by providing a list of visualisation requests in document “EN020027-002710-Ardleigh Parish Council and Little Bromley Parish Council” [REP4-319].

The Applicant responded at deadline 5 to ALBA’s submission with comments under the heading “3.13 ISH2 Action Point 32” in document “EN020027-003567-8.4.12 Applicants Comments on Post-Hearing Submission...” [REP5-194].

ALBA response

ALBA would like to highlight the following points in relation to the Applicant’s [REP5-194] submission:

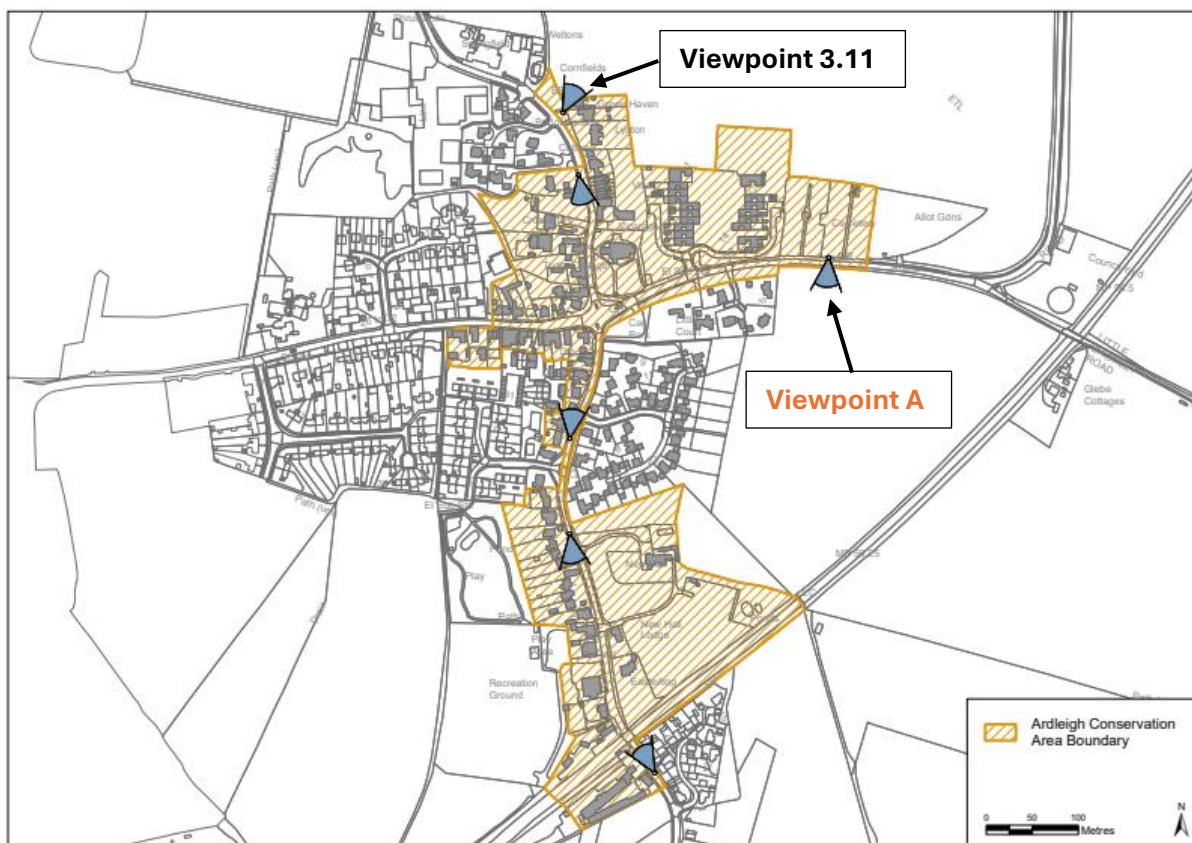
- The following statement is very concerning: *“The conclusions of the Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] or the Historic Environment assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] will not change as a result of adding new illustrated viewpoints”*.
- These are viewpoints that the Applicant has not previously assessed, despite earlier requests from ALBA. It is therefore premature to state that the assessments would not change.
- Five of these requests date back to the 2024 statutory consultation – please refer to [REP4-319] for details.
- Of the 11 viewpoints requested by ALBA, the Applicant has stated that it will only be producing visualisations for 2 of these (Bounds Farm, Hungerdown Lane and at the intersection between PRow Ardleigh 5 and PRow Ardleigh 7/Green Lane).
- In addition, the Applicant has committed to producing the new visualisations for deadline 6 instead of deadline 5 as requested by the ExA.
- The Applicant acknowledges *“the effect on visual receptors would be major and significant”* for 5 of the 9 viewpoints that were dismissed. ALBA considers this level of harm to be sufficient justification alone for including viewpoints relating to these visual receptors.
- ALBA strongly disagrees with the following statement, which the Applicant has attached to two of the requested viewpoints: *“It was agreed with heritage stakeholders that a VP from/across the ‘Crop Mark Site S of Ardleigh’ (1002146)*

scheduled monument would not contribute to the conclusion of assessment as the archaeology has no above ground remains and therefore this visual element of its setting does not provide a significant contribution to its value". The setting does provide a significant contribution to its value, as ALBA has outlined in previous submissions.

- In relation to requested *"Viewpoint A - From the South of the A137 Ardleigh Conservation Area (CA26)"* the Applicant states: *"The location as shown on the image is not one of the key views identified on Figure 43, page 38 of Ardleigh Conservation Area Character Appraisal and Management Plan (Place Services 2025). It is close to VP 3.11 which is informed by one of the identified key views in the conservation area appraisal and has informed the assessment of the conservation area"*.
- Both statements are incorrect, as outlined below:
 - (i) Viewpoint A does in fact coincide with one of the key views identified on Figure 43, page 38 of Ardleigh Conservation Area Character Appraisal and Management Plan. The map showing the location of Viewpoint A was provided in section 1.2. of "Appendix A: Viewpoint Maps and Images" in [REP4-319]. The corresponding map from the Ardleigh Conservation Area Character Appraisal and Management Plan¹ was included on page 14 of the [REP4-319] main document.
 - (ii) The location, orientation and views from Viewpoint A are very different to VP 3.11. and therefore warrant an additional visualisation.
- To help clarify the matter, an annotated copy of the *"Map showing key views within the Conservation Area"* from the Ardleigh Conservation Area Character Appraisal and Management Plan is included in this document. Labels have been added to show the viewpoint that is close to the Applicant's "VP 3.11" and the viewpoint that is close to ALBA's "Viewpoint A".
- "Viewpoint A" represents one of the key views in the Ardleigh Conservation Area Character Appraisal and Management Plan. As it is also one of only two key external views identified in the conservation area plan and, as there would be extensive visibility of the proposed development from this viewpoint, the views from here should have been considered in the assessment of harm to the Ardleigh Conservation Area. The Applicant only refers to the other external view, which is the one close to Applicant's VP 3.11.
- Ardleigh PC highlighted the significance of the view from this second viewpoint (now known as "Viewpoint A") in the Historic Environment report submitted for

the Norwich to Tilbury Statutory Consultation in July 2024², but, as illustrated here, this was not accepted by the Applicant.

- The Applicant refers to the vegetation removal plans as an alternative to the declined visualisation request for Bentley Road (PAR30), Little Bromley. ALBA does not consider that the 2D plans adequately convey the impact of the proposed vegetation removal.
- Two of the declined viewpoint requests relate to the route alignment changes introduced during the 2025 Targeted Consultation. As no visualisations relating to this change were supplied at the time of the consultation, or in response to requests made when the changes were confirmed, it remains to be the case that no visualisations in any form have been supplied to reflect these changes. Please refer to [REP4-319] for further details of the previous requests.
- Additionally, the Applicant has not addressed points raised by ALBA in [REP4-319] in relation to the quality of the existing visualisations, such as the Grade II* St Mary's Church, Ardleigh (1112060) being obscured by a tree in the image from Viewpoint 3.31.



² <https://img1.wsimg.com/blobby/go/35e229d7-0729-4580-8608-6221bf69b316/downloads/Ardleigh%20PC%20submission%20to%20NG-%20Historic%20Environ.pdf>

2. 3D visualisation tool

In response to the ALBA document on visualisations [REP4-319], in LV 2.19 of Examining Authority's Written Questions 2 (ExQ2) [PD-023] the following was requested of the Applicant by deadline 5 (10 June 2026):

“3D Visualisation Tool

At deadline 4, both Villages Against Pylons [REP4-380], and Ardleigh and Little Bromley Parish Councils [REP4-319] provided photographs taken from a public consultation event. These appear to have been taken from a 3D Visualisation Tool. The ExA acknowledge the response you provided to Ardleigh and Little Bromley Parish Council in Appendix B of [REP4-319] and appreciate that these images may not have been worked up into industry-standard visualisations. However, the photographs submitted cover areas that have not been extensively covered by visualisations and, in the absence of formal visualisations, would therefore be of use to the examination. The applicant is asked to provide screenshots from the 3D visualisation tool from the locations identified in these two submissions.”

In response the Applicant supplied screenshots from the 3D visualisation tool in Appendix H of “8.9.2 Applicant's Response to Second Written Questions” [REP5-211].

The new images were naturally of higher quality than the photographs taken of a computer screen by residents during the 2024 statutory consultation.

However, it would have been helpful if the Applicant had also supplied images from the 3D visualisation tool for the locations where it has refused to grant requests for photomontage visualisations, and if the model had been updated to reflect the changes relating to the 2025 targeted consultation.

3. Limit of Deviation visualisations

The Applicant provided Limit of Deviation (LoD) Visualisations for Viewpoint HE25 in Ardleigh in response to ISH2 Action Point 25. The relevant document is “8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 3” [REP5-197]. The visualisations for this viewpoint are on pages 43 to 49 (out of 49) of the electronic version.

When considered together, the images on pages 46 and 49 of [REP5-197] provide a 180-degree view at the Limit of Deviation. Copies of these images are below:



The images show that overhead lines would be very visible for most of this 180-degree view. Some of the pylons around the village are angle pylons which have a significantly higher visual impact, and these will come into view depending on the exact viewing position.

Noting that this viewpoint, HE25, is in the village centre, ALBA considers that the Applicant should re-assess the impact of the proposed infrastructure on the village. This includes re-assessment of the many heritage assets located in the centre, noting that the Applicant scoped most of these out of the assessment. As outlined in previous submissions, the Applicant’s drawing “Figure 11.2- Historic Environment - Designated Heritage Assets Assessed in the ES Chapter (now at Revision C)” [REP4-145] only shows one listed building in the Ardleigh Conservation Area, which is the Grade II* St

Mary's Church, Ardleigh (1112060). There are 17 listed buildings in the conservation area and many important non-designated heritage assets. There is therefore a high aggregative value. An overview of the impact on the historic environment is provided in previous submission "*Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh*" [AS-065].

As has been raised previously, considering the rich heritage of the village, it is not considered sufficient for ALBA to only have one Historic Environment viewpoint.

4. Conclusions

The Applicant's response to the requests for additional viewpoints is very disappointing, particularly considering the very high degree of harm the proposal would cause to ALBA.

Issues with the previous visualisations are outlined in ALBA submission [REP4-319].

The response does not address the needs and concerns of the community. Many residents are still not aware of the full impact. It also deprives the Examination of important information when there is only 5 weeks remaining until the end of the 6-month process.

As has been the case throughout, the Applicant has not properly considered the knowledge of those who live in the community. Detailed information has been supplied by ALBA at all stages of the process from people who know and understand the area and would have to live with proposals.

The Applicant uses the word "*proportionate*" to justify its decision making in relation to the requests for additional visualisations. Proportionality should apply to the specific situation and the harm caused. The route of the proposed infrastructure in ALBA is particularly complex and hard to visualise. There is also no doubt that the impact on ALBA of the Norwich to Tilbury project and the associated proposals would be profound.

The images from the 3D visualisation tool demonstrate a much higher level of harm than is apparent from the photomontages supplied by the Applicant. These images represent a subset of those listed in ALBA's visualisation requests.

In light of the Applicant's decision to not supply photomontages for these viewpoints, the ExA is respectfully referred to the images from the 3D visualisation tool in Applicant's document [REP5-211]³ Appendix H, LV 2.19 page 396 to 414 (out of 429) and the corresponding baseline images supplied by ALBA residents in ALBA submission [REP4-319]⁴ (the main report and the Appendices).

As several important viewpoints have never been assessed, the Applicant's landscape and heritage conclusions need to be treated with appropriate caution.

³ EN020027-003552-8.9.2 Applicant's Response to Second Written Questions

⁴ EN020027-002710-Ardleigh Parish Council and Little Bromley Parish Council