



**Response from Ardleigh Parish  
Council and Little Bromley Parish  
Council to the National Grid Norwich  
to Tilbury DCO Application**

**Viewpoints and Visualisations in the  
Ardleigh and Little Bromley area**

**Revision: 1**

**Date: 12 May 2026**

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# 1 Summary

- 1.1. This report supplements previous submissions relating to the Norwich to Tilbury proposals from Ardleigh Parish Council and from Little Bromley Parish Council.
- 1.2. The report specifically relates to how the visual impact of the proposed design has been presented by the Applicant and, as invited by the Examining Authority in “ISH2 Action Points”<sup>1</sup>, includes requests for further visualisations.
- 1.3. To provide focus the exercise was approached from the perspective of a limited number of priority heritage assets and green spaces. As a result, some of the Applicant’s DCO visualisations are not discussed.
- 1.4. For the Ardleigh and Little Bromley area (ALBA), a fundamental issue throughout the three consultation stages of the project has been the difficulty in fully understanding not only the impact of the Norwich to Tilbury project but also the cumulative impact when the other associated infrastructure projects are considered.
- 1.5. There is no doubt that the impact of the proposals on ALBA would be profound, but the complexity of the Norwich to Tilbury route through the area and the scale of the proposed infrastructure make it very difficult to appreciate the full impact. Visualisations are an important part of this.
- 1.6. No visualisations were provided at the 2022 and 2023 non-statutory consultations.
- 1.7. At the 2023 non-statutory consultation, even simple photographic images providing examples of very pertinent aspects of the project such as underground cable and substation construction were limited to a few small and inconspicuous photobooks at the venue. These images were not displayed on the main boards, or indeed with the material on the consultation website.
- 1.8. The first visualisations did not appear until the 2024 statutory consultation and the quality of these was poor. Issues relating to these visualisations were highlighted by Ardleigh PC in its submission for the 2024 statutory consultation, with detailed requests made for visualisations from additional viewpoints to be provided for the DCO application.
- 1.9. Links to the most relevant 2024 statutory consultation submissions from Ardleigh PC follow. Both documents discuss viewpoints, with requests for additional visual receptors in the Ardleigh area detailed on page 51 onwards of document “Ardleigh PC main submission NG statutory consultation July 2024”:
  - Ardleigh PC main submission NG statutory consultation July 2024 (pdf)<sup>2</sup>

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<sup>1</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-002539-ISH2%20Action%20Points%20.pdf>

<sup>2</sup> <https://img1.wsimg.com/blobby/go/35e229d7-0729-4580-8608-6221bf69b316/downloads/Ardleigh%20PC%20submission%20NG%20stat%20consultation%20Ju.pdf?ver=1767845648545>

- Ardleigh PC submission to NG- Historic Environment (pdf)<sup>3</sup>
- 1.10. Also relevant is the Ardleigh PC Response to 2025 Targeted Consultation:
- Ardleigh PC Response to N2T Targeted Consultation 27 March 2025 (pdf)<sup>4</sup>
- 1.11. None of the requests for additional visual receptors detailed in the Ardleigh PC submission for the July 2024 statutory consultation was included in the Applicant’s DCO submission.
- 1.12. No visualisations were presented for the 2025 Targeted Consultation, even though the proposal involved the overhead line alignment being moved closer to the scheduled monument site, which would therefore have an impact on its setting.
- 1.13. When the 2025 Targeted Consultation changes were confirmed in the DCO application, a request was made on behalf of Ardleigh PC for two visualisations specifically relating to these changes, but the request was declined by the Applicant. The redacted email correspondence has been included as “Appendix B”.
- 1.14. The quality of the visualisations provided by the Applicant for the DCO application was also poor. This is not acceptable considering the scale of the proposed infrastructure and potential harm to the area. The attention paid has not been proportionate to the harm the scheme would cause.
- 1.15. Throughout the consultation stages, valuable opportunities for the community to engage with and understand the proposals were not taken. It is very disturbing that at this late stage, halfway through the 6-month Examination process, these issues persist.
- 1.16. The issue is not only important to communities. Visualisations also help inform the Applicant and the Examining Authority in their assessments.
- 1.17. For ease of presentation, and to better suit the landscape format of the images, this document has been split into two sections. The main images have been placed in separate document “Appendix A”.

## Appendices

- **Appendix A:** Viewpoint Maps and Images
- **Appendix B:** Correspondence with the Applicant (2025) [REDACTED]
- **Appendix C:** Bentley Road (PAR30) Visualisation Request

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<sup>3</sup> <https://img1.wsimg.com/blobby/go/35e229d7-0729-4580-8608-6221bf69b316/downloads/Ardleigh%20PC%20submission%20to%20NG-%20Historic%20Environ.pdf?ver=1767845648545>

<sup>4</sup> <https://img1.wsimg.com/blobby/go/35e229d7-0729-4580-8608-6221bf69b316/downloads/64413f24-25b9-4267-b36a-3603b318f801/APC%20Response%20to%20N2T%20Targeted%20Consultation%2027%20M.pdf?ver=1767845648485>

*This report has not been prepared by an expert on behalf of the Parish Council. It covers a number of areas in which the Parish Council cannot profess to have internal expertise. However, it has been produced through extensive research (without the use of A.I), with references to source material appropriately identified. Other material has been identified and produced as the result of local knowledge and it is the Parish Council's fortune to have identified members of the community who are extremely knowledgeable, if not qualified experts. This should not devalue the points raised in the report, which have been identified as areas of key concern to the local community and so has been produced to assist the Examining Authority to consider those concerns and provide the basis for focused questioning of the applicant.*



- substantial harm to a major fruit supplier (Peake Fruit).
- threat to mineral resources.
- very significant harm to high value heritage assets, including many listed buildings, buried archaeology and a scheduled monument site.
- impact on the adjacent Dedham Vale National Landscape.
- loss of local biodiversity, including historic hedgerows.
- loss of valued local green spaces.

2.6 The harms would be compounded by the convoluted route chosen for the overhead lines, as this requires more pylons than a straight alignment and a high proportion of the pylons would be high visual impact angle pylons. A consequence of this is a significant increase in visual impact in an area with a high amenity value.

2.7 Despite extensive engagement from the local community at the various National Grid consultations, the concerns raised were not addressed. This includes not considering detailed local knowledge in relation to the impact on high value heritage assets, such as a site of high archaeological potential in Ardleigh that would be severely impacted by the proposals.

### 3 Viewpoint locations

#### 3.1 Viewpoint locations in the Ardleigh and Little Bromley area used by the Applicant for the DCO application

The following table was compiled to list the Applicant’s viewpoints that are particularly relevant to the Ardleigh and Little Bromley area. All data in the table was obtained from the Applicant’s documents.

The appropriate map from the Applicant is provided in Section 1.1 of Appendix A.

No.	Name	Visualisation Type	Reason for Selection
HE25	Ardleigh	Photomontage	Key view identified in conservation area appraisal, looking north towards church, to illustrate whether the Project is visible from the center [sic] of Ardleigh Conservation Area.
3.11	PRoW north of Ardleigh (Ardleigh 2)	Photomontage	Representative of people living and moving around the community of Ardleigh and using the local PRoW and road network and within the conservation area.
3.12	Waterhouse Lane, Burnt Heath	Photomontage	Representative of people living and moving around the community of Burnt Heath and Bromley Cross and using the local PRoW and road network. Potential view of EACN Substation.
3.13	PRoW, Little Bromley (Little Bromley 16)	Photomontage	Representative of people using the local PRoW and road network around Little Bromley and visiting the Church of St Mary (Grade II* listed). Potential view of EACN Substation.
3.14	Lodge Lane, Ardleigh Reservoir	Photomontage	Representative of people using Ardleigh Reservoir for recreation and people using the local road network.
3.15	Birchwood Road west of Lamb Corner	Photomontage	On the edge of the National Landscape. Representative of people living and moving around Lamb Corner and people using the local road and PRoW network in this area.

<b>3.21</b>	Barn Lane, Little Bromley	Photomontage	Representative of PRoW network in this area and of the site of the Tendering [sic] Show at Lawford Farm.
<b>3.23</b>	Crown Lane North, near Ardleigh Reservoir	Photomontage	Representative of people using the Protected Lane.
<b>3.31</b>	Ardleigh Heath	Photomontage	Representative of residents around Ardleigh Heath and users of the local road network.

It is noted that the Applicant has stated the following in relation to Viewpoint 3.21: *“The baseline photography for Viewpoint 3.21 Barn Lane, Little Bromley will be re-taken and an updated photomontage will be provided at Deadline 4”*.

## 3.2 Additional viewpoint locations previously requested by Ardleigh Parish Council

The list of viewpoint locations previously requested by Ardleigh Parish Council is provided in the following table. A map showing the locations is provided in Section 1.2 of Appendix A.

The July 2024 statutory consultation submission from Ardleigh PC specifically requested views from Viewpoints A to E to be included in the Applicant's DCO submission, but these were not provided. Subsequently an updated visualisation from of Viewpoint E and a visualisation from new Viewpoint F were requested to reflect the changes to the alignment made in 2025.

All the viewpoints chosen are located either on roads or PRowS and are therefore accessible locations. Three of the six viewpoints are at intersections between PRowS.

Name	Description	Reason for Selection
<b>Viewpoint A</b>	From the South of the A137 Ardleigh Conservation Area (CA26)	This is one of the key views identified in the Tendring District Council "Ardleigh Conservation Area Character Appraisal and Management Plan".
<b>Viewpoint B</b>	Intersection between PRow "Ardleigh 5" and PRow "Ardleigh 7"/Green Lane.	Like many views from around the village, this shows the prominence of Grade II* St Mary's Church, Ardleigh (1112060) in the surrounding flat landscape.
<b>Viewpoint C</b>	Mid-point on the Wick Lane causeway.	This is to show the cables spanning the northern section of Ardleigh Reservoir and the adjacent pylons, including angle pylon TB15.
<b>Viewpoint D</b>	From the North of Frating Road, near the boundary with Elm Park.	To show the span of the tall infrastructure behind the Scheduled Monument site (1002146).
<b>Viewpoint E</b>	Intersection between PRow "Ardleigh 3" and PRow "Ardleigh 24".	An update was requested to reflect the proposed changes to the route alignment in Ardleigh following the 2025 Targeted Consultation, but the request was declined by the Applicant.
<b>Viewpoint F</b>	Edge of Scheduled Monument (1002146) site at intersection between PRow "Ardleigh 28" and PRow "Ardleigh 29"	This was a new request to reflect the proposed changes to the route alignment in Ardleigh following the 2025 Targeted Consultation. As no visualisations were presented as part of Targeted Consultation this was to enable the impact on the views from the PRow and the setting of the scheduled monument to be assessed. The request was declined by the Applicant.

## 4 Comments relating to key visual receptors

### 4.1 Grade II\* St Mary's Church, Ardleigh (1112060) and Ardleigh Conservation Area (CA26)



The proposals from the Applicant would result in the historic village centre of Ardleigh being encircled by 50-60m tall pylons and overhead lines.

Located in the village centre are the Grade II\* St Mary's Church, Ardleigh (1112060) and the Ardleigh Conservation Area (CA26).

As part of the Ardleigh Parish Council response to the 2024 Norwich to Tilbury Statutory Consultation, a survey of heritage assets within the Parish was conducted by residents.

A total of 88 heritage assets were identified and the impact of the proposal on each of these was assessed. This included a total of 71 Listed Buildings, the Ardleigh Conservation Area, the Scheduled Monument and a vast array of non-designated heritage assets, including the routes of Roman Roads. Further information is provided in the report "Ardleigh PC submission to NG- Historic Environment"<sup>6</sup> submitted for the Statutory Consultation in July 2024. Subsequently, a further 19 heritage assets were added to the Ardleigh Parish Council survey bringing the total to 107.

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<sup>6</sup> <https://img1.wsimg.com/blobby/go/35e229d7-0729-4580-8608-6221bf69b316/downloads/Ardleigh%20PC%20submission%20to%20NG-%20Historic%20Environ.pdf?ver=1767845648545>

There is a very high concentration of heritage assets in the Ardleigh Conservation Area (CA26). These include:

- 17 Listed Buildings out of the total of 71 Listed Buildings in the Parish, comprising 16 Grade II buildings, plus the Grade II\* Church of St Mary (1112060). It is important to note that Figure 11.2 in the Applicant's DCO application (APP-217) only shows 1 of the 17 listed buildings in the Ardleigh Conservation Area.
- 19 Local List candidates. These are additional to the heritage assets identified in the original Ardleigh Parish Council survey and are buildings in the Conservation Area that are proposed for Local List assessment in the Tendring District Council "Ardleigh Conservation Area Character Appraisal and Management Plan"<sup>7</sup>. The process of approving the Tendring District Local List is still ongoing, but, whatever the outcome, the attributes of these buildings and their contribution to the area has been established by an independent body appointed by Tendring District Council, via a formal assessment process.

This concentration of heritage assets helps illustrate the high aggregative value of the Ardleigh Conservation Area (CA26). The value is further enhanced by its proximity to Scheduled Monument (1002146). The "Ardleigh Conservation Area Character Appraisal and Management Plan" states: *"the most notable designated heritage asset in the setting of Ardleigh Conservation Area is the crop mark site, designated as a Scheduled Monument, which is one of the largest Bronze Age cemeteries yet discovered in Eastern England"*.

The Bidwells submission "Appendix F - Heritage Pylons East Anglia Response 10.04.26"<sup>8</sup> [REP3-134], produced for Pylons East Anglia Ltd, highlights the impact on several heritage assets in Ardleigh. The report refers to the "cumulative harm experienced by the heritage assets associated with the village of Ardleigh". It also states, for example, that the proposal "will result in Substantial Harm to the Conservation area and a High Level of Substantial Harm to the listed buildings".

#### 4.1.1 Images supplied by the Applicant as part of the 2025 DCO application

The Applicant's photomontages HE25b, HE25c, HE25d and HE25e from viewpoint HE25 are provided in Sections 2.1.1. and 2.1.2. of Appendix A.

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<https://legacy.tendringdc.gov.uk/sites/default/files/documents/planning/Appendix%20A%20%20Ardleigh%20Conservation%20Area%20Character%20Appraisal%20and%20Management%20Plan.pdf>

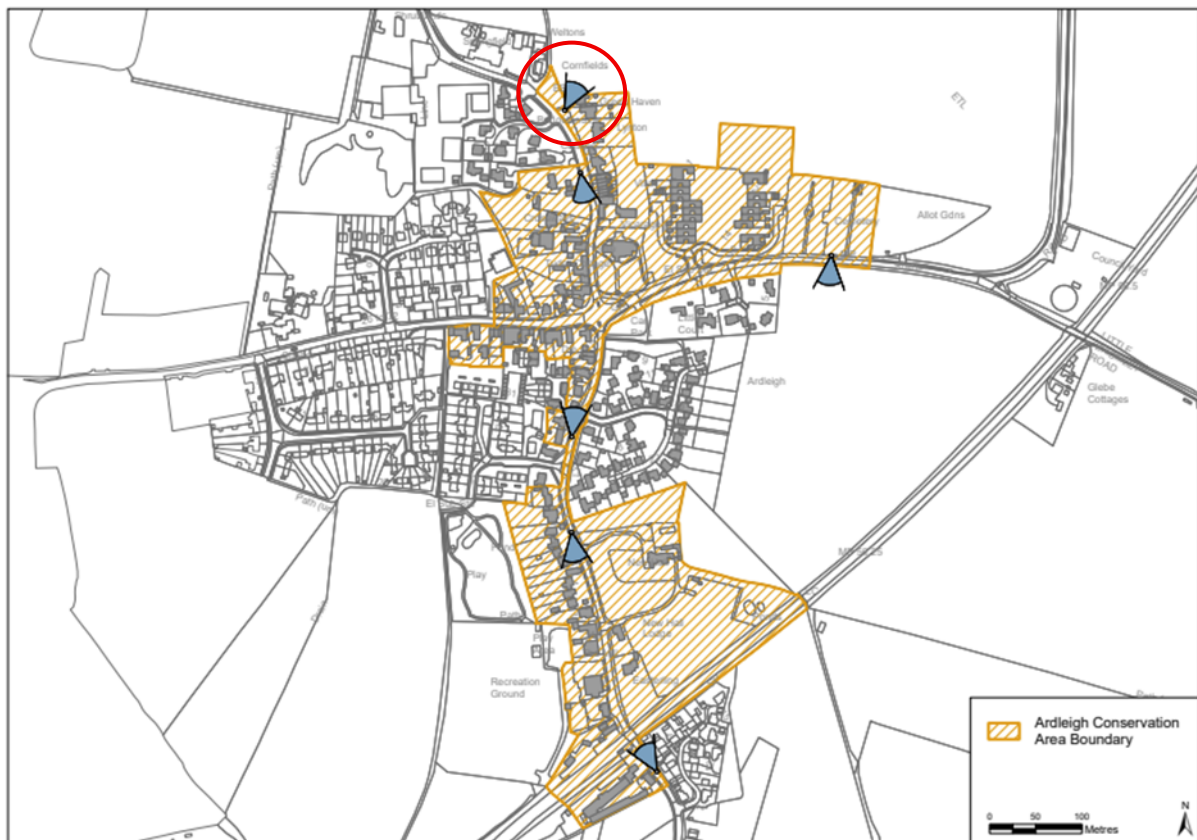
<sup>8</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-002378-Appendix%20F%20Heritage%20Pylons%20East%20Anglia%20Response%2010.04.26.pdf>

HE25 is a helpful viewpoint as it demonstrates that the proposed overhead line would be clearly visible from St Mary’s Church, Ardleigh and from the centre of Ardleigh Conservation Area.

However, as is the case with many of the Applicant’s other photomontages for Ardleigh, the image quality is poor. The main issue with HE25b, HE25c, HE25d and HE25e is that the images are over exposed. Orange coloured arrows have been added to the HE25 images in Appendix A to show the position of proposed overhead lines.

These are the only Historic Environment images of Ardleigh supplied by the Applicant. For a village with such a rich heritage this is a clear omission.

Images 3.11d and 3.11e from Viewpoint 3.11, which are provided in Section 2.1.4. of Appendix A, are also helpful. These images show the very significant impact on an important view from Ardleigh Conservation Area. This was identified as one of the two key external views in the Tendring District Council “Ardleigh Conservation Area Character Appraisal and Management Plan”<sup>9</sup>, which was initially published in 2023. The view is highlighted here by the red circle added to a map from the Tendring District Council Ardleigh Conservation Area Character Appraisal and Management Plan.



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<https://legacy.tendringdc.gov.uk/sites/default/files/documents/planning/Appendix%20A%20%20Ardleigh%20Conservation%20Area%20Character%20Appraisal%20and%20Management%20Plan.pdf>

The impact on bridleway PRow “Ardleigh 2” would also be very significant as it would be bisected by the proposed overhead line.

Images 3.31b and 3.31c from Viewpoint 3.31, which are provided in Section 2.1.6. of Appendix A, are deceptive. Close inspection of the images shows that the Grade II\* St Mary’s Church, Ardleigh (1112060) is hidden behind a tree. In the following enlarged section from image 3.31c, it is just possible to distinguish the crenelations on the church tower – a red circle has been added here to assist. An orange arrow has been added to image 3.31c in Appendix A to show the location of the church.



The following photograph of the baseline landscape was taken by an Ardleigh resident. The location is approximately 25m further along Dead Lane than the image presented by the Applicant. In this location, from other points along Dead Lane and from the connecting PRow “Ardleigh 22” there is good visibility of the church. The setting of the church would be severely impaired by the proposed location of tall infrastructure between the viewer and the church.



These images help demonstrate the large-scale harm to the setting of the church that would result from the proposed infrastructure. The Church tower is approximately 22 metres tall at the highest point (the top of the corner turrets). As the proposed pylons vary between approximately 50 and 60 metres in height, the Church would become subordinate to the pylons. The Ardleigh PC submission: “Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh”<sup>10</sup> [AS-065], discusses the harm to the setting of the church in relation to other viewpoints around the village. Photographs

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<sup>10</sup> [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-001068-Route%20alignment%20and%20substation%20siting%20in%20Ardleigh\\_1.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-001068-Route%20alignment%20and%20substation%20siting%20in%20Ardleigh_1.pdf)

of the view from the top of the church tower included in Appendix C-6 of report [AS-065] demonstrate the widespread visibility of the tower.

The Tendring District Council “Ardleigh Conservation Area Character Appraisal and Management Plan” identifies the Church as a “Landmark Building”. It also states: *“Ardleigh is rural in character, surrounded by flat countryside comprised of open and agrarian fields. St Mary’s Church is a distinctive landmark at the centre of the village and forms part of the views encountered on approaches into the Conservation Area.”*

## 4.1.2 Other images relating to the location

### 4.1.2.1 Images of infrastructure from Viewpoint E

Section 2.2.1. of Appendix A shows two images from the Ardleigh PC specified “Viewpoint E”. These were supplied by the Applicant during the 2024 Statutory Consultation, following a request from Ardleigh PC.

Annotations have been added to the copies of the images in Appendix A of this report to highlight features.

These images show how the proposed overhead lines would wrap around the Ardleigh Conservation Area (CA26) and the Grade II\* St Mary’s Church, Ardleigh (1112060), thereby severely impacting the settings. The impact is far more apparent in these images from the Ardleigh PC specified “Viewpoint E” than it is from the images supplied by the Applicant for the DCO Application, as presented in section 4.1.1 of this report.

It is also to be noted that in the section shown in the first of the two images, 18 underground HVAC cables would closely follow the OHL route. Even though the underground cables would not result in further tall infrastructure, the construction impact from the combination of overhead lines and underground cables in this section would be substantial.

As these images were produced in 2024, they do not include the alignment changes presented by the Applicant during the 2025 Targeted Consultation, which were then confirmed in the DCO application. The pylon positions around the church and conservation area are unchanged but further curvature to the route alignment was introduced towards the proposed EACN substation, which increases the visual impact.

### 4.1.2.2 Photograph taken from Viewpoint E

The photograph provided in Section 2.2.2. was taken by an Ardleigh resident to provide a baseline image from Viewpoint E.

This image clearly also shows how tall infrastructure introduced to the landscape here would severely impact the setting of the Grade II\* St Mary’s Church, Ardleigh (1112060).

It shows, for example, clear visibility of the church from PRow “Ardleigh 3”, which is labelled in the photograph.

#### *4.1.2.3 Images of infrastructure from Viewpoint B*

The images in Section 2.2.3. of Appendix A are from the Ardleigh PC specified “Viewpoint B”. These were supplied by the Applicant during the 2024 Statutory Consultation, following a request from Ardleigh PC. The first image has been annotated to highlight the Grade II\* St Mary’s Church, Ardleigh (1112060).

The location is at the intersection between PRow “Ardleigh 5” and PRow “Ardleigh 7”/Green Lane, which is approximately 700m from the church tower. The aim was to help understand the visual impact of the tall infrastructure sited behind the tower of St. Mary's Church, Ardleigh (1112060) and the rest of the Ardleigh Conservation Area (CA26). Even though the image is not very distinct, the dominance and the wide span of the tall infrastructure is clear. The image was cropped to assist comparison with the photograph discussed in the following section.

#### *4.1.2.4 Photograph taken from Viewpoint B*

The photograph in section of 2.2.4. of Appendix A, was taken by an Ardleigh resident from Viewpoint B. This provides a baseline image for the previous visualisation from Viewpoint B. It shows the current setting and the prominence in the landscape of the tower of the Grade II\* St Mary’s Church, Ardleigh.

#### *4.1.2.5 Image of infrastructure from Viewpoint A*

The image in Section 2.2.5. of Appendix A was supplied by the Applicant during the 2024 Statutory Consultation following a request from Ardleigh PC.

The image was requested because it was identified as one of the two key external views in the Tendring District Council “Ardleigh Conservation Area Character Appraisal and Management Plan”<sup>11</sup>. The other key external view is discussed in Section 4.1.1 of this report.

The image shows widespread views of the infrastructure from the Ardleigh Conservation Area. This image does not show the additional curvature to the route alignment that was confirmed in the 2025 DCO application. This would further increase the visual impact.

This image and the Applicant’s images from Viewpoint 3.11 demonstrate the very significant visual impact from the two key external viewpoints identified in the Tendring District Council “Ardleigh Conservation Area Character Appraisal and Management Plan”.

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<https://legacy.tendringdc.gov.uk/sites/default/files/documents/planning/Appendix%20A%20%20Ardleigh%20Conservation%20Area%20Character%20Appraisal%20and%20Management%20Plan.pdf>

## 4.2 Scheduled Monument (1002146) “Crop mark site S of Ardleigh”

Scheduled Monument (1002146) consists of crop circles showing bronze age burial sites, ditches and trackways. It has produced a huge number of archaeological finds from the earliest Neolithic finds through the Bronze Age, Roman, Iron Age and Saxon periods. The evidence shows that Ardleigh was a flourishing community in the years 1400BC to 800BC. The site is on a plateau in a landscape which has not changed substantially since these early settlements existed.

The proposal to locate tall infrastructure adjacent to the Scheduled Monument in Ardleigh would cause substantial and permanent harm to the setting. This area is also considered to have high archaeological potential as discussed in Ardleigh PC submission: “Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh”<sup>12</sup> [AS-065].

The 2025 Targeted Consultation change involved TB5 and TB6 being positioned significantly closer to the Scheduled Monument site and TB6 also becoming an angle pylon. The consequence would be that the 7 towers closest to the Scheduled Monument site (TB4 to TB10) would be the most visually intrusive types: 5 angle pylons and 2 extended height, suspension towers (TB8 and TB9). The extended height towers are needed where the OHL is planned to cross the railway. Each of these would be 59.8m high.

### 4.2.1 Images supplied by the Applicant as part of the 2025 DCO application

No images were supplied for this location by the Applicant for the 2025 DCO application. As previously discussed, the request from Ardleigh PC for a visualisation from this location, denoted as Viewpoint F, was declined by the Applicant.

The Applicant’s Zone of Theoretical Visibility (ZTV) maps do though show widespread visibility of the proposed pylons and EACN substation across the Scheduled Monument site.

### 4.2.2 Other images relating to the location

In the absence of a visualisation for this location, an image was derived from work produced by the Landscape Partnership for Pylons East Anglia Ltd, as part of the group’s submission for the 2024 statutory consultation. The associated Landscape Partnership documents are the “Norwich to Tilbury High-Level Landscape Susceptibility Appraisal”<sup>13</sup> and the “Landscape Susceptibility Appendices”<sup>14</sup>.

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<sup>12</sup> [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-001068-Route%20alignment%20and%20substation%20siting%20in%20Ardleigh\\_1.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-001068-Route%20alignment%20and%20substation%20siting%20in%20Ardleigh_1.pdf)

<sup>13</sup> [https://drive.google.com/file/d/11QLhaPKtyMazywMDR81V0JPnVXM36wxS/view?usp=drive\\_link](https://drive.google.com/file/d/11QLhaPKtyMazywMDR81V0JPnVXM36wxS/view?usp=drive_link)

<sup>14</sup> [https://drive.google.com/file/d/1j1WV2orLnNyUt9sxGTmrbsl0FbFc3UI9/view?usp=drive\\_link](https://drive.google.com/file/d/1j1WV2orLnNyUt9sxGTmrbsl0FbFc3UI9/view?usp=drive_link)

The work by the Landscape Partnership included generic illustrations to show apparent heights of pylons from various regular distances. One of the images was then scaled to suit the viewing distance in this example. To verify the work calculations were performed to ensure that the method employed produced the same “apparent heights” as those listed for other distances in the landscape consultants’ report.

The resulting illustration “Image of infrastructure from Viewpoint F” is provided in Section 3.2.1. in Appendix A of this report. This shows the apparent height of a 50m pylon when viewed from 160m, which is the approximate distance between the edge of the Scheduled Monument site and the nearest pylon, TB6. To provide an image at the same scale as the eye would see, the diagram should be printed on A3 and viewed at a distance of 500-550mm (approximately arm length).

Please note the following:

- This pylon, and those adjacent to it, are angle pylons which are significantly more visually intrusive than the standard lattice pylon shown.
- The image does not represent the orientation of the tower – it is purely to help visualise the scale of the infrastructure.
- The 20m high tree shown is approximately the same height as St Mary’s Church tower, which is currently the dominant structure in the village.

This basic image is intended to help illustrate the impact on the setting of this protected site. Noting that pylon TB6 would be an angle lattice pylon, a copy of the Applicant’s drawing “Illustrative Labelled Angle Lattice Pylon” from “EN020027-000274-2.6.2 Design and Layout Plans - Overhead Lines” [APP-042] is included in Section 3.2.2. of Appendix A of this report.

The table and chart in Section 3.2.3. of Appendix A provide the figures calculated for apparent height at various distances from the object.

### 4.3 Glebe Corner “Local Green Space 6”

The importance of this Local Green Space is highlighted in the 2024 submission to the statutory consultation “Ardleigh PC submission to NG- Historic Environment”. It refers, for example, to the description from the Ardleigh Neighbourhood Plan 2020 – 2033 which states:

*“This space comprises former glebe land (historically attached to the village church) that now appears as rough grassland, bordered by dense and mature hedgerows of some quality. The space is considered to provide a very important landscape function, marking the unofficial “entrance” to Ardleigh from the east. Its partial treed enclosure clearly distinguishes it from the wider open landscape and serves to signpost the transition from large-scale arable countryside to small-scale rural settlement. In its current state, the site has clear biodiversity value and appears to support an abundance of butterflies and bees. It also assists to preserve the tranquillity and landscape qualities of the adjacent allotments and cemetery. Although it is no longer glebe land, it retains many of the undeveloped qualities that it would historically have held as glebe land and it continues to form part of the church’s heritage setting. Its retention provides an evocative reminder of the ecclesiastical origins of this part of the Parish.”*

The nearest pylon, TB9, would be located approximately 85m from Glebe Corner. The planned height for this pylon is 60m. The proximity of this area to the proposed infrastructure would be extremely harmful to all the qualities described here. Also, as it “continues to form part of the church’s heritage setting” this will further impact the setting of the Grade II\* St. Mary's Church, Ardleigh (1112060). Despite the Applicant recognising the existence of the Ardleigh Neighbourhood Plan this local green space would be severely harmed by the plans.

#### 4.3.1 Images supplied by the Applicant as part of the 2025 DCO application

No images were supplied by the Applicant for this location as part of the 2025 DCO application.

#### 4.3.2 Other images relating to the location

##### 4.3.2.1 Image of infrastructure from Viewpoint A

The image in Section 4.2.1. of Appendix A is from the Ardleigh PC specified “Viewpoint A”, which is South of the A137 Ardleigh Conservation Area (CA26). This image was supplied by the Applicant during the 2024 Statutory Consultation, following a request from Ardleigh PC. The image has been annotated to show the location of Glebe Corner “Local Green Space 6”.

The approach discussed in Section 4.2.2 of this report, can also be used to assess the apparent height of nearest pylon TB9, when viewed from Glebe Corner. The distance

between the edge of Glebe Corner and pylon TB9 is approximately 85m. From the table provided in Section 3.2.3. of Appendix A, the apparent height of a 60m pylon at 85m is 379mm. This compares with the apparent height of 167mm for the 50m pylon shown in Section 3.2.1. of Appendix A. The corresponding pylon image for TB9 would therefore be approximately 2.3 times<sup>15</sup> the height of the image shown for the scheduled monument site, and therefore a very imposing structure. This is due to the increase in height pylon (60m compared with 50m) and the closer proximity as a result of the inversely proportional relationship.

When the distance to the pylon is so small, the Limits of Deviation have a very significant impact on the apparent height. If, for example, pylon TB9 were to be moved 50m closer to Glebe corner, i.e. to a distance of 35m, the apparent height of the proposed 60m pylon would become 919mm, which is 5.5 times<sup>16</sup> the apparent height of the pylon image shown in Section 3.2.1. of Appendix A. This does not include consideration of the vertical Limit of Deviation.

The table and chart in Section 3.2.3. of Appendix A also provide information to help assess the visual impact in other parts of the village. Calculations were included for the apparent height of the 22m tower of St Mary's Church, Ardleigh (1112060), so that comparisons could be made with the apparent height of the proposed infrastructure.

For example, in relation to the discussion on Viewpoint B in Section 4.1.2.3 and 4.1.2.4 of this report, the apparent height of the church tower at the viewing distance of 700m is 16mm. The apparent height of 50m pylons 500m further away, i.e. at 1200m would be 22mm. Therefore, even at these distances, the apparent height of 50m pylons would be 1.4 times greater<sup>17</sup> than the height of the church tower, which is the current landmark. The images in Section 2.2.3. of Appendix A help confirm this.

The flatness of the landscape in Ardleigh greatly increases the visual prominence of the proposed pylons. It is also to be noted that many of the proposed pylons would be much closer to this viewpoint. For example, the second image in Section 2.2.3. of Appendix A shows pylons in the foreground to the left (although the image is not very clear).

The apparent heights stated provide an image at the same scale as the eye would see, when the diagram is printed on A3 and viewed at a distance of 500-550mm (approximately arm length).

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<sup>15</sup> (379/167)

<sup>16</sup> (919/167)

<sup>17</sup> (22/16)

## 4.4 Fishing Lake “Local Green Space 1”

Fishing Lake “Local Green Space 1” is the second of the two areas of Local Green Space in Ardleigh that the proposed project interacts with. The description for this Local Green Space in Ardleigh Neighbourhood Plan 2020 - 2033 states:

*“Parts of the site support beautiful, far-reaching public views to be had both across the arable landscape and back towards the settlement edge. These views are genuinely representative of the Landscape Character Area and largely unchanged since historic times. The space is emblematic of the historic (and, in other places, eroded) abrupt spatial relationship between the medieval nuclear village of Ardleigh and the surrounding working countryside. It has been used for recreational walking by villagers for hundreds of years...”*

The significance of this Local Green Space to the community extends significantly beyond “fishing provision within Ardleigh”, as stated by the Applicant.

In the current Norwich to Tilbury proposals, an overhead line would cross the fishing lake in Local Green Space 1 between pylons TB13 and TB14. The height of the pylons sited on either side of the lake would be 50.8m and 56.8m respectively.

The presence of this tall infrastructure would effectively negate all the positive attributes of this valued Local Green Space outlined in the Ardleigh Neighbourhood Plan.

### 4.4.1 Images supplied by the Applicant as part of the 2025 DCO application

No images were supplied by the Applicant for this location as part of the 2025 DCO application. The pylons proposed for either side of the lake, TB13 and TB14, and the associated overhead line can be seen though in photomontages 3.31c and 3.31e from Viewpoint 3.31, which are provided in Section 2.1.6. and 2.1.7. of Appendix A.

### 4.4.2 Other images relating to the location

#### 4.4.2.1 *Photographs taken of the 3D CAD model presented by the Applicant during the 2024 Statutory Consultation*

The photographs of the 3D CAD model provided in Section 5.2.1. of Appendix A show how severely this valued green space would be harmed by proposed infrastructure. The overhead line is proposed to bisect the Fishing Lake. Pylons TB13 and TB14 would dominate the area.

#### 4.4.2.2 *Photographs of Fishing Lake “Local Green Space 1”*

The photographs provided in Section 5.2.2. of Appendix A are intended to help convey the current beauty of this location.

## 4.5 Ardleigh Reservoir

The reservoir and the surrounding land have become an area of great natural beauty and an important wildlife habitat. The proposals entail an overhead line crossing the northern section of the reservoir between pylons TB15 and TB16.

### 4.5.1 Images supplied by the Applicant as part of the 2025 DCO application

The photomontages supplied by the Applicant do not adequately illustrate the visual impact at Ardleigh Reservoir. The images from this location, Viewpoint 3.14, are copied in Sections 6.1.1. and 6.1.2. in Appendix A of this report. The issues found relate to choice of viewpoint and image quality. They also do not adequately convey the baseline natural beauty of this location.

### 4.5.2 Other images relating to the location

#### 4.5.2.1 *Images of infrastructure from Viewpoint C*

The two visualisation images in Section 6.2.1. of Appendix A, were from the Applicant's 3D CAD model. These were supplied during the 2024 Statutory Consultation following a request from Ardleigh PC. These use of an angle pylon, TB15, in this location further compounds the visual impact.

Viewpoint C was chosen by Ardleigh PC because of the high value attached to this location and the number of people who currently enjoy it. The location is the Wick Lane causeway, which is a popular route. Consequently, the views here are appreciated by many people.

#### 4.5.2.2 *Photographs taken from Viewpoint C*

A series of photographs are presented in Section 6.2.2. of Appendix A.

The first photograph was taken of the 3D CAD model presented by the Applicant during the 2024 Statutory Consultation. For comparison the photograph to the right was taken by an Ardleigh resident from the same location.

The final photograph was included to provide a baseline image.

The proposals would cause huge harm to the enjoyment of this area and obvious risks to the abundant birdlife in this area, despite the proposals to include bird diverters. Concerns relating to the effectiveness of bird diverters, and the risk of the devices further increasing the visual impact, have been outlined by Ardleigh PC in previous submissions to the Examination.

## 5 Request for further visualisations re. “ISH2 Action Points”

In response to the “ISH2 Action Points”, visualisations from the following locations are requested:

- Viewpoints A to F, in Ardleigh, as detailed in Section 3.2 of this report. A map showing the locations is provided in Section 1.2 of Appendix A.
- Glebe Corner “Local Green Space 6”, Ardleigh.
- Fishing Lake “Local Green Space 1”, Ardleigh.
- Little Bromley Road, towards the junction with Hungerdown Lane.
- Bounds Farm, Hungerdown Lane (impact discussed in ISH2).
- Bentley Road (PAR30), Little Bromley (impact discussed in ISH2) \*.

\* Details relating to this request are provided in separate document: “*Appendix C - Bentley Road (PAR30) Visualisation Request*”

In all cases the visualisations should convey worst-case scenarios. This includes the worst-case visual impact showing the full extent of the proposed infrastructure, the effect of road widening/straightening and the loss of trees/mature hedgerows.

## 6 Conclusions

- 6.1 For the Ardleigh and Little Bromley area (ALBA), a fundamental issue throughout the three consultation stages of the project has been the difficulty in fully understanding not only the impact of the Norwich to Tilbury project but also the cumulative impact when the other associated infrastructure projects are considered.
- 6.2 There is no doubt that the impact of the proposals on ALBA would be profound, but the complexity of the Norwich to Tilbury route through the area and the scale of the proposed infrastructure make it very difficult to appreciate the full impact. Visualisations are an important part of this.
- 6.3 No visualisations were provided at the 2022 and 2023 non-statutory consultations.
- 6.4 At the 2023 non-statutory consultation, even simple photographic images providing examples of very pertinent aspects of the project such as underground cable and substation construction were limited to a few small and inconspicuous photobooks at the venue.
- 6.5 The first visualisations did not appear until the 2024 statutory consultation and the quality of these was poor. Issues relating to these visualisations were highlighted by Ardleigh PC in its submission for the 2024 statutory consultation, with detailed requests made for visualisations from additional viewpoints to be provided for the DCO application.
- 6.6 None of the requests for additional visual receptors detailed in the Ardleigh PC submission for the July 2024 statutory consultation was included in the Applicant's DCO submission.
- 6.7 No visualisations were presented for the 2025 Targeted Consultation, even though the proposal involved the overhead line alignment being moved closer to the scheduled monument site, which would therefore have an impact on its setting.
- 6.8 When the 2025 Targeted Consultation changes were confirmed in the DCO application, a request was made on behalf of Ardleigh PC for two visualisations specifically relating to these changes, but the request was declined by the Applicant.
- 6.9 As discussed in this report, the quality of the visualisations provided by the Applicant for the DCO application was also poor. This is not acceptable considering the scale of the proposed infrastructure and potential harm to the area. The attention paid has not been proportionate to the harm the scheme would cause.
- 6.10 Valuable opportunities for the community to engage with and understand the proposals were not taken. It is very disturbing that at this late stage, halfway through the 6-month Examination process, these issues persist.

6.11 The issue is not only important to communities. Visualisations also help inform the Applicant and the Examining Authority in their assessments.

**This report supplements previous submissions from Ardleigh Parish Council and from Little Bromley Parish Council.**