

Ardleigh Parish Council and Little Bromley Parish Council's (ALBA) Response to the ExA's First Written Questions (ExA Q2)

This response to ExA Q2 has been prepared on behalf of Ardleigh Parish Council ("APC") and Little Bromley Parish Council ("LBPC") (together "the Parish Councils"). In preparing these answers, the Parish Councils have also had regard to the material provided at Deadline 4. Where appropriate, this material is referenced in response to the questions.

The Parish Councils support the ExA's questions and challenges to the Applicant. From the outset the Parish Councils have found that National Grid's (the Applicant) responses to questions have been unhelpful both in their verbal answers during the consultations and their written responses to questions during the examination. As they did during the consultation they continue to expect us to just accept statements such as "we have looked at this in detail and on balance have decided that this is the best solution" but without clear reasons or evidence to support what they are saying. They still also seem to think that referring us to previously published documents that are hundreds of pages long and very poorly indexed is an adequate answer.

Many of the questions that the ExA has raised in Q2 have already been raised by the Parish Councils, sometimes on multiple occasions in previous submissions either during the consultations or during the examination. Concerns raised by the Parish Councils during the consultation have either been ignored or inadequately answered by the Applicant, which at times has appeared to have simply been "going through the motions" to get this DCO submitted and approved without putting in the work required to show that the scheme is acceptable in planning terms.

The Parish Councils' comments and observations are set out in what follows. The Parish Councils hope they have been set out in such a way so as to assist the ExA. In respect of avoiding duplication and to refer back to earlier submissions made by the Parish Councils, a matrix is also included that references documents in which the Parish Councils believe they have already submitted answers to the ExA's questions, in line with the guidance in Gen2.1.

GEN 2.3 Cumulative Assessment – Methodology

The Parish Councils support the ExA's questions in GEN- 2.3 and welcomes a clear explanation from the Applicant of all points raised. The cumulative effects of all 5 projects have not been clearly laid out.

Please refer to the included paper entitled Combined Cumulative Impact Ardleigh & Little Bromley, which deals with this question in detail

The Parish Councils also support TDC's REP3-094, which addresses Cumulative effects [across NSIPs]

GEN 2.4 Report on interrelationship with other infrastructure projects

The Parish Councils supports TDC REP3 -094 Cumulative effects [across NSIPs]

The Parish Councils would also point out that there is still not a clear map that shows clearly the interrelationship with other infrastructure projects, including order limits, haul roads, compounds and cable routes

DES 2.1 Independent Design Review – 1

The Parish Councils have previously requested maps and plans for the design of the overall site of the combined projects.

DES 2.2 Independent Design Review – 2

NF & FE have both consulted directly with communities and run sessions for Parish Councils. The Applicant has not, despite requests that it do so.

DES 2.3 Independent Design Review – 3

The Parish Councils' support ExA's question.

It is important for residents to be clear about what is proposed. It is very difficult to understand exactly what the sites will look like.

DES 2.4 Design of temporary works and compounds

The Parish Councils support Exa's question

BIO 2.1 Assessment of biodiversity deficit

Full support for ExA's question from the Parish Councils

APC questions how the underground swathe of 120 metres plus 100m potentially affected can be fitted into the space between Peake Fruit Farm reservoir and Little Bromley Road.

The Parish Councils do not consider that the current approach to replacement planting, habitat restoration, and Biodiversity Net Gain provides sufficient certainty regarding local delivery, long-term management, or successful ecological recovery.

The Parish Councils seek reassurance that any screening and replacement of trees and hedgerows are properly maintained and monitored for several years.

No map is available showing the overall areas in the ALBA where the removal of hedges and tree lines is proposed. These areas will also have been included in environmental/ ecological surveys. The Parish Councils ask “where are the reports”

The Applicant has failed to meet the criteria set out in DEFRA’s Environmental Improvement Plan (EIP) published on 1 December 2025 (endorsed by the Secretary of State for Environment, Food and Rural Affairs – Emma Reynolds MP)

BIO 2.3 Post-consent assessment work for bats

The Parish Councils support ExA question in that the information is vague as to the detail from the report. Local knowledge/ research indicates some of the following:

- Bats, Skylarks and Nightingales have been observed and heard around the area of Home Farm Lane and Little Bromley Road, particularly Peake Fruit Farm reservoir.
- Turtle Dove feeding strips (part of RSPB’s Turtle Dove project) and Barn Owl box in Home Farm Lane and Little Bromley Road.

There will be a permanent impact on these protected species.

The Parish Councils would like more detail on the method used to assess bats and the locations of bat roosts in the area.

Some landowners within the ALBA are still awaiting reports from surveys carried out on their land by the Applicant more than two years ago

BIO 2.9 Assessment of impacts on birds

The Parish Councils also support Pylons East Anglia Ltd REP4-369.

Ardleigh has many lakes and reservoirs, including Ardleigh Reservoir

Evidence has been submitted in previous submissions as to the scale and variety of bird life using these waterways. Numerous swans regularly congregate on the affected part of Ardleigh Reservoir.

The Parish Councils question the judgement made by the Applicant that “additional monitoring or adaptive management is not considered necessary or proportionate”

The Parish Councils would like to understand the use or dismissal of diverters on OHL’s. How would the assessment be applied?

BIO 2.10 Additional bird diverters

Ardleigh Reservoir sits directly under the East Atlantic Flyway (a major “avian superhighway”) and acts as a crucial inland stopover and refuelling point for migrating birds.

The Parish Councils have grave concerns over mitigation. NG needs to explain how diverters will work with so many birds flying together

BIO 2.15 Impact of the proposed development on Five Estuaries and North Falls Offshore Wind Farms

The Parish Councils are unclear on 'quantity of native hedgerows' that will be cumulatively lost within the ALBA. The Applicant should be required to confirm its plan in replacement planting/monitoring/servicing and this should be considered as a requirement to the DCO if granted.

BIO 2.17 Assessment of cumulative effects on biodiversity

The Parish Councils support the question posed by ExA

CA 2.1 Anglia Ruskin University (ARU) Writtle

The Parish Councils understand there is a similar situation in the ALBA, but where it appears landowners are being coerced into accepting Heads of Terms prior to a DCO being consented (the Applicant is offering early-signing incentive payments (up to 20% land rights value).

These will be forfeited if signing is refused!

The Parish Councils question as to whether these incentive payments have been included in the Applicant's costings?

DCO 2.A1 Articles - General

The Parish Councils supports the ExA question.

The Parish Councils have contributed to every consultation process and Relevant Representations, asking that this DCO be reconsidered and repositioned either offshore or the EACN placed in a less damaging site.

The Parish Councils representing their local communities are not confident that their representations are being fairly considered or responded to by the Applicant. This has led to a lack of confidence that the Applicant will ever communicate any changes it may consider in the future.

DCO 2.S3 Schedules 3, Requirement 4 (Construction Management Plans) 1

The Parish Councils have serious concerns in relation to this subject. The ALBA could be experiencing a construction period for many years, and without a strong management and complaints process independent of the constructors, we fear that breaches will be ignored or devalued

DCO 2.S6 Schedules 3, Requirement 4 (Construction Management Plan) 4

The Parish Councils share the ExA and Thurrock Council's concern.

Common sense should be applied. Experience shows that any traffic diversions on the A12 through the village can cause serious problems for residents.

The planned increased vehicle activity will have serious implications and effects on residents and businesses within ALBA

DCO 2.S8 Schedules 3, Requirement 4 (Construction Management Plan) 6

The Parish Councils endorse the ExA comments and question and would welcome details on mitigation for multiple vehicles/ machinery operation concurrently in various locations in the area

The Parish Councils agree that the focus on a single cottage is wholly inadequate given the number of properties that would potentially be affected.

DCO 2.S9 Schedules 3, Requirement 5 (Archaeology)

The Parish Councils have raised, in several submissions, that the whole ALBA area has a large amount of Archaeology.

The ALBA has been continuously settled since Neolithic times and both Parishes have Scheduled monuments. It is inconceivable that there is not archaeology that has not been discovered in the area.

The Parish Councils therefore support the County Council and Local Authority's concerns.

DCO 2.S10 Schedules 3, Requirement 7 (Construction Hours)

The Parish Councils are strongly opposed to weekend and Bank Holiday working.

Residents are already suffering from Wellbeing and Health issues as a result of the uncertainties.

There has to be respite, or the Applicant will face taking responsibility for harming people's mental health.

DCO 2.S11 Schedule 3 – Requirements 8 (Retention and removal of trees, woodland and hedgerows)

There are a number of TPOs throughout the ALBA.

The Parish Councils would like to understand what steps will be taken to protect them. For example, there are a number on Wick Lane and Little Bromley and Home Farm Lane.

Concerns have recently been raised by a landowner in Ardleigh, who risks losing an established woodland to at least 200m of underground cabling swathe. This woodland has been in existence since before 1842 and provides a precious, undisturbed wildlife haven and corridor. The Applicant has stated to the landowner that the cheapest option was to remove the woodland. The other, less destructive option, of mole boring cables under the B1029 and wood, has been ruled out by the Applicant on cost grounds.

The view of the Applicant being that the wood has insufficient environmental benefit as it is not classified as an ancient woodland. How will the Applicant adequately reinstate this habitat in any meaningful way?

Further, and by way of an update, it is understood that in respect of this particular area of woodland an application is currently being considered by Natural England with regard to its possible status as ancient woodland. The reference number for that application is 550408.

HE 2.1 Historic environment – methodology

The Parish Councils want to understand where/how assessments are decided. We agree with the ExA's question.

There is no official differentiation of the value of a conservation area. This is a subjective assessment that has no basis and is designed to suggest that there is less harm associated with a lower value.

HE 2.3 Grouping of heritage assets & HE 2.4 Assessments across multiple assets

The Parish Councils support both questions.

The assessments do not seem to take into account the settings. For example, surrounding a village with Pylons has a serious cumulative adverse effect on all the assets in multiple ways.

HE 2.10 Assessment of impacts on archaeology

The Parish Councils welcome this question.

Concerns relating to an area of high archaeological potential and the survey methods employed by the Applicant are highlighted in [AS-065] "Report on Proposed Route Alignment and EACN Substation Siting in Ardleigh".

To date, the Applicant has not shared any data on trenching results with either the local landowners or the Parish Councils.

We have no knowledge of any significant finds, although records indicate a likelihood of Roman archaeology in the vicinity of the EACN, as two Roman roads converge on the proposed sites of the EACN and windfarm substations.

LUS 2.2 Green Belt - 1

In a similar way, protected Green Space land is of great importance in ALBA, and land quality (Grade 1 BMV), both of which would be lost/damaged.

Grade 1 BMV is amongst a small percentage of the best in the UK. Due to fertile soils, flat open landscape, higher sunshine hours, and a generally drier climate, it's one of the best areas in the UK for growing staple crops like wheat, barley, oats and sugar beet.

The Parish Councils question whether this position by THE APPLICANT is justified.

LUS 2.4 Green Belt -3

As set out in its response to the Proposed Route Alignment and the EACN Substation Siting in Ardleigh Revisions 1 (submitted on 26 January 2026) (AS-065), Ardleigh Parish Council has identified Local Green Spaces within its Neighbourhood Plan, several of which would be seriously compromised by developments (see pages 18-21 of that document)

LV 2.8 Cumulative Landscape and Visual Assessment - landscape

The Parish Councils welcome the question as we do not seem to have seen (from the Applicant) any reference to how the EACN and associated substations and interconnector will change into a different landscape.

LV 2.12 Residential Visual Amenity Assessment – 1 (RVAA)

The change of visual amenity will be considerable across the whole of Little Bromley and Ardleigh.

Soft vegetation dies back in the winter, and deciduous trees will provide no effective screening for around six months of the year.

The Parish Councils question whether there is any legitimate argument that screening is valid mitigation in a flat landscape.

LV 2.14 Mitigation hierarchy

The Parish Councils would be interested in visualisations using low-height pylons from the EACN to the A12

LV 2.16 Mitigation and compensation - 1

From REP4-302, the Applicant does not seem to be proposing to compensate for landscape and visual effects at all. Ardleigh and Little Bromley Parish Council (ALBA) has already provided evidence on loss of business, loss of food production, blighting of properties, loss of social mobility, loss of landscape, loss of tranquillity, loss of mental health as opposed to the commercial interests of the Applicant.

If DCO consent is granted, the communities of Ardleigh and Little Bromley would expect substantial compensation to be provided.

NV 2.1 Noise & Vibration 1

The Parish Councils would like to understand how the construction noise levels will be monitored /mitigated for when unacceptable and the properties most affected?

Also of concern is cumulative on-going noise from the EACN and other substations and noise from the pylon cables

PRoW 2.1 PRoW 1

Please refer to the document: Impacts on Public Rights of Way and Recreational Access in Ardleigh Parish, appended to this document and prepared by the Parish Councils.

SS 2.1 Security and resilience

The Parish Councils support concerns raised by Burstall PC.

The Parish Councils are particularly concerned about the level of risk caused by the scale of the clustering of the electricity infrastructure around proposed substations, in this open rural site. In particular, the Parish Councils are concerned about:

- The sheer size of the structures surely make it extremely vulnerable in terms of accidental or deliberate damage/sabotage.

- Recent world events highlight the vulnerability of energy infrastructure and the level of security needed to ensure that such infrastructure is protected in the event of a conflict or disaster (such as a fire).
- areas where established hedgerows are currently part of boundary security for landowners. Removal of hedging will leave fields vulnerable to trespassing and fly-tipping. Insurance policies will be greatly affected, and extra premiums will be expected.

- How does the Applicant propose to address these risks?

TT 2.4 Outline CTMP 2

The Parish Councils invite the Applicant to engage with them, as North Falls and Five Estuaries have in the past. There exists a joint specific group set up to address the cumulative projects: Planning and Infrastructure Working Group, reporting to both Parish Councils.

The Applicant has always shown reluctance to do so during the consultation phases.

Ardleigh and Little Bromley Parish Councils
10 June 2026