

LITTLE BROMLEY PARISH COUNCIL

Clerk: Mrs Dawn Sauka
Tel: 07977 498297

Chairman: Mr Jon Buxton
Tel: 07484 617583

Email: littlebromleypc@gmail.com



Response to Five Estuaries Stage 2 Consultation

Little Bromley Parish Council (LBPC) strongly oppose Five Estuaries current plans for development of onshore infrastructure in the parish of Little Bromley. Our precious rural landscape would be industrialised by your substation, with large swathes of farmland permanently affected by underground cabling. Your development would be a permanent disfigurement of the parish, remove valuable arable land necessary for food security from production, generate significant construction and ongoing noise, affect residents and community amenities. There is concern that the development will negatively affect sale potential and sale value of properties in the area.

LBPC understand that Five Estuaries is working in Tendring District and Little Bromley as you have been offered a connection into the proposed National Grid East Anglia Green substation. The National Grid project is very contentious with over 23,000 people having signed a petition calling for an offshore grid. Across East Anglia residents, parish councils, district councils, county councils and members of parliament (OFFSET group of MP's) have united in voicing their opposition to the current National Grid plans. With an offshore connection there would be no need for your development. LBPC ask that Five Estuaries support and participate in the NG ESO review supporting the offshore alternative.

The cumulative effect of the planned Five Estuaries development together with those planned by North Falls and National Grid is devastating for Little Bromley and is causing many residents anxiety and stress.

Specific concerns we have with the Five Estuaries plans are as follows:

- **Visual Impact** - The potential visual impact for the entire parish is major. The scale of the substation within its search areas is so large that proposed screening cannot be entirely effective. You state that, from all considered viewpoints, the initial visual impact is classed as Major reducing to Moderate or Minor after 5 to 10 years. With the height of the substation buildings being up to 15 metres, and the tree species proposed growing up to 8 metres (after 15 years), then there is still in the order of 7 metres of the industrial substation visible above the tree line. LBPC would like to understand how screening can be improved so the substation is less visible.
- **Operational Noise** - There is concern on the noise levels from the substation. Your modelling shows an increase in noise at selected noise monitoring sites, such that noise mitigation measures are needed to be put in place when the substation is built. You are looking for around a 10dbA reduction by mitigation. However LBPC are concerned that you do not state what the expected maximum noise increase will be around the village as a consequence of your substation operation. LBPC believes that it is essential that the residents have a clear understanding of noise levels with mitigation measures in place. As can be seen from the background noise measurements taken, Little Bromley is a very quiet area, and LBPC believe that any noise increase with consequent reduction in quality of life for residents is unacceptable.

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- **Construction Noise** - The construction period of 12-hours per day, 6 days a week for over 2 years will be hugely disruptive to the village and surrounding area. LBPC believes that construction noise will be intrusive to the village and surrounding areas. You have selected a 65dBA threshold as being acceptable and we would like to understand the basis for this level being chosen. LBPC also believe that different noise types can be particularly penetrating - for example a back-up alarm or vehicle motion alarm can be clearly heard over a long distance. It would be helpful to understand what mitigation measures could be included to reduce construction noise.
- **Construction Traffic** - The predicted HGV traffic during the construction period is exceptionally high with greater than 6x volume growth from today, for example, on Bentley Road (from 28 per day to 181 per day). With a 12 hour work day this would indicate an average of 15 HGV movements per hour, or one every 4 minutes. We would expect that in reality there will be periods where volumes are even higher with less traffic at other times. The roads in the parish of Little Bromley are not designed for such traffic volumes and size. It is not possible for two HGV's to pass on most roads without one of the vehicles mounting the road verge, with subsequent verge damage. The roads themselves are in poor repair, and with this volume of HGV's will deteriorate further and faster. LBPC would like to understand how Five Estuaries will mitigate these highway problems.
- **Construction Dust and Mud** - Five Estuaries are planning a 2-year plus construction project which will create significant dust, dirt and mud on roads. Residents properties and gardens will be affected, and our roads will be affected. LBPC would like to understand how Five Estuaries plan to mitigate this.
- **Construction Traffic Management** - LBPC understand that the current traffic management plan is essentially for traffic to be removed from the public highways onto haul roads. It has not been made clear how access of Five Estuaries traffic into haul roads will be achieved - will this be by traffic light control for example - as this could cause delays in the local road network. LBPC would also like to understand how Five Estuaries will ensure and police that HGV's and other development traffic does not route through the village of Little Bromley and surrounding single track roads.
- **Route Disruption** - LBPC believe the impact on the local road network around Little Bromley parish will be high. Bentley Road, Paynes Lane, Spratts Lane, Barlon Road, Ardleigh Road and Grange Road will all be crossed by the Export Cable Corridor and Haul Roads. It has not been made clear how Bentley Road will be crossed (whether HDD will be used) but we have been advised that the other roads listed will be open trenched. Further to the West it is planned that Waterhouse Lane will be used as an access route (for HGV's and other vehicles) and it is also possible that Clacton Road (off Horsley Cross Roundabout) will be used with an access point into the Five Estuaries development. With all these roads affected there will be major disruption to village, farm and business traffic flows, with the key access into the A120 severely restricted.
- **Loss of Village Amenity** - The Five Estuaries development and associated facilities such as haul roads, temporary construction compounds and haul road access points will be highly disruptive to day-to-day village life. Quiet country roads and Public Rights of Way will be affected impacting residents, walkers, cyclists and horse riders. There are many farms which need access to their properties and fields at all times of year, and especially during harvest. Annual events such as the Little Bromley 10k race and the Corbeau Seats Rally use many of the roads and areas of the parish that will be affected by the development. Both these events raise significant funds for local charities. An important village social gathering point is St Marys Church (Grade II* Listed by National Heritage), which will have the ECC passing close and have major development close by. St Marys is maintained by the Church's Conservation Trust, with many events organised by the Friends of Little Bromley Church. Services are still carried out on an occasional basis at the Church. The village bus service runs down Bentley Road, and school buses run daily during term time to take local children to their schools.
- **Business Impact** - With road diversions and closures and large parts of the parish under development our village businesses, many of which depend on local road access by customers, could be seriously affected.

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- **Village Well Water** - Many properties in Little Bromley have no mains water connection and are reliant on well water. There is concern on whether the Five Estuaries development will affect the water sources in the village and affect these water supplies. Extension of the water main to these properties would seem to be the only way to guarantee continuity of supply.
- **Village Drainage** - Little Bromley has a very high water table and during wet periods localised flooding and drainage problems can occur. There is concern on whether the Five Estuaries development will affect the village drainage flows and increase the frequency or scale of these events.
- **Wildlife and Environmental Impact** - Little Bromley parish has a rich and varied wildlife population as identified by the Five Estuaries and North Falls surveys. This includes many species of waterbirds and non-waterbirds (you have identified 51 target species in the area surveyed). We are very close to the Stour Estuary SSI and Ramsar site, and your surveys indicate bird species present which are related to those sites. Badgers, hares, foxes, deer, bats and other mammals can be found in the parish. Grass snakes are regular seen in the summer. These all thrive in the parish, as we have woodland, extensive hedgerows and arable margins some of which will be affected by your planned development. The migratory bird route across East Anglia, the East Atlantic Flyway, has gained Government backing to bid to become a UNESCO World Heritage Site. Major developments such as planned by Five Estuaries, North Falls and National Grid will have serious impact. You state that the potential exists for protected or notable species to be impacted by construction activities either physically via permanent or temporary habitat loss or by inadvertent injury or killing or from disturbance via light, noise and human presence. You also state that there is potential for permanent habitat fragmentation and species isolation as a result of the OnSS construction and also from construction of the cable route. The OnSS construction will bring a permanent loss of an estimated 5.88Ha of habitat together with the additional loss of the TCC area and the cable route during construction.

Little Bromley Parish Council