

To: The Planning Inspectorate

National Infrastructure Planning

National Grid's Norwich to Tilbury Project (EN020027) – Registration of Relevant Representation on behalf of Little Bromley Parish Council (LBPC)

I am submitting this Relevant Representation on behalf of **Little Bromley Parish Council (LBPC)** in relation to National Grid's (**NG**) Norwich to Tilbury Nationally Significant Infrastructure Project (**NSIP**). LBPC strongly objects to the proposals as the proposals fail to identify and consider the best and least harmful approach to grid expansion. In particular, LBPC has concerns about the proposals as they relate to the Parish of Little Bromley, most notably the siting of the **East Anglia Connection Node (EACN)**, a permanent access road from the centre of Little Bromley to the EACN and cabling infrastructure.

Overview

NG's current alignment would irreversibly damage the unique character, landscape, and continuity of villages including Little Bromley which have sustained rural life for generations. The historical and ecological features which make these communities precious—landscapes, habitats, cultural identity—are at grave risk, with the proposed infrastructure offering no scope for meaningful avoidance or mitigation.

In addition to LBPC's detailed submissions to the 2024 Statutory Consultation and the March 2025 Targeted Consultation, LBPC objects to the NG NSIP proposals on the following principal grounds:

1. Cumulative Impact

It is disingenuous to consider the NG proposal, particularly as it relates to the EACN, without simultaneously considering the inextricably linked proposals for the other infrastructure (including substations and converter station) also being proposed in Little Bromley by Five Estuaries, North Falls and Tarchon.

The cumulative effect of all the substations and associated infrastructure will effectively destroy Little Bromley as the small rural village that has existed for well over a thousand years. It would be unprecedented for a private limited company, even operating under the guise of a Nationally Significant Infrastructure Project, to wipe out an entire community.

2. Consultation and Engagement

The so-called consultation process has been characterised by the presentation of seemingly predetermined decisions, with no credible alternatives considered or meaningful changes enacted following feedback from local communities. We have not received "fair and serious consideration" of our input, contrary to planning law and best practice (including Gunning Principles).

Despite consultation being a legal mandate, NG has persistently communicated only what they intend to do and where, never inviting substantive debate or alternatives.

At no time has NG held a public meeting or information session in Little Bromley. The nearest consultation venues have been 3+ miles away and neither in Little Bromley nor Ardleigh as severely impacted villages. No evidence exists of genuine engagement nor of adjustments in response to local concerns and suggestions.

Maps and documentation were and continue to be very difficult for ordinary people to access, navigate and understand.

3. Specific concerns and local impacts:

- **Road closures/diversions:** it is impossible to fully understand and assess from the Examination Library documentation (including APP-027 and APP-053) the level of impact the various road closures, diversions and other traffic management measures will have on communities like Little Bromley and the wider Tendring Peninsula over a prolonged period. It is clear that almost all roads in and out of Little Bromley will be affected at some point. LBPC feel that better modelling and consultation with affected communities is necessary to understand the impact on daily movements (school, work, routine appointments etc), quality of life (carer or other “home help” services) and access to urgent medical/emergency services is needed.
- **Noise and vibration concerns:** Many of the houses and properties in Little Bromley are many hundreds of years old and were built without foundations. That is one of the reasons why the road through the village, all the way from the A120 to the A137 in Lawford is restricted to vehicles over 7.5T. Document APP-256 (6.14 Environmental Statement Chapter 14 – Noise and Vibration (Final Issue A). In Para 14.7.27 (Construction Vibration Effects on Buildings and Structures). NG have identified only *“five structures or buildings where there is the potential for damage due to construction vibration from potential compaction activities”*. Two of these are located along Bentley Road in Little Bromley (War Memorial and The Haywain) and another two in the entrance to Bentley Road on the turning off the A120 (Jasmine Cottage and Pellens Cottage). LBPC urge the Planning Inspectorate to require NG to undertake further investigations as there are other properties along Bentley Road which are of similar age and lack proper foundations that are not listed. These include Grade II listed “Christmas Cottage” located approximately 10 meters from The Haywain which is on the list.
- **Construction traffic noise:** Para 14.7.33 of Document APP-256 notes the potential for *“a large adverse magnitude impact”* along Bentley Road with specific properties noted as being particularly at risk and even with mitigation, Para 14.7.36 notes that *“major significant adverse effects from construction traffic noise would still be expected along Bentley Road.”* LBPC are very concerned by this and the prolonged impact on residents particularly as it is clear that construction activity will continue over weekends and public holidays.
- **Impact on Little Bromley protected War Memorial:** we are concerned that Little Bromley war memorial, listed as a building of Special Architectural or Historic Interest and listed as Grade II is at risk. Document APP-011

(Document: 2.2 Land Plans - Section C) indicates that it sits within an area of compulsory purchase (C-16/1), it is impacted by the above vibrations concern and LBPC are generally concerned that the sheer volume of traffic could result in accidental damage through construction traffic not only related to NG but also from the other NSIPs and residents/visitors to the area all trying to use Bentley Road at the same time. The general setting of the war memorial within Little Bromley including its outlook on a “heritage hedge” is particularly notable however, from Document: 2.16 Trees and Hedgerows to be Removed and or Managed Plans – Section C, it seems that this “heritage hedge” will be removed.

- **Cumulative and non-NSIP traffic:** APP-275 Document: 6.16.A4 Environmental Statement Appendix 16.4 – Traffic and Transport Construction Effects (Image A16.4.30) shows NG HGV and LGV traffic peaking at over 850 vehicles per day along Bentley Road with more than 18 months of the construction period seeing more than 400+ HGV and LGV vehicle movements. LBPC are very concerned by this volume of traffic along a usually rural and quiet road with very little HGV traffic currently due to the 7.5T weight limit. We question whether the stated figures take into account non-NG “controlled” traffic including authorities and agencies visiting/attending site to monitor works, to deal with inevitable issues and liaise with NG contractors? What about the cumulative traffic figures generated by the North Falls and Five Estuaries NCIPs as well as Tarchon?
- **Severe permanent impact to character of Little Bromley:** Bentley Road is a currently narrow and winding country road with mature trees and hedgerows which takes users (including walkers, cyclists, horseriders) from homes, footpaths and other entrances along its length into Little Bromley or in the reverse direction connecting to Cycle Route 51 on the opposite side of the A120. It is proposed that this currently characterful road which by its nature has a naturally traffic calming effect will be permanently widened and straightened, losing many of its mature trees and hedgerows which serve not only as important habitats but also act as windbreaks to prevent topsoil erosion from the surrounding fields. This proposed widening and straightening of sections of Bentley Road, the removal of mature trees and hedgerows alongside (including opposite the War Memorial) will result in a permanent loss and disfigurement to the landscape which is currently enjoyed by many.
- **Permanent access road siting in the centre of the Little Bromley:** the siting of a permanent access road from the centre of Little Bromley to the EACN is of particular concern. LBPC and residents’ concerns and suggestions of alternatives seem to have been ignored. The only change seen in NG’s Targeted Consultation was a minor repositioning of the road to better follow a field-edge. A sensible alternative that does not appear to have been explored would be to construct a permanent road off the A120 bypassing the village and outlying homes entirely. Of course, any permanent feature should be suitably screened and mitigations put in place. Having a permanent access road in the centre of the Little Bromley village with its

entrance close to the protected war memorial between two 90 degree bends and in clear view and in close proximity to a number of homes does not seem to be the obvious choice.

- **Unquantified loss of trees and hedgerows:** whilst NG documentation does appear to identify some trees/hedgerows that are at risk of removal, we have not been able to assess whether other arboreal management is proposed e.g. removal of individual mature tree branches over roads or thinning of hedges to allow passing of vehicles that are wider/taller/more numerous than usual. Clearly this will not only change the character of country roads (e.g. where there are natural arboreal tunnels or natural shade) but will also increase the biodiversity loss and flood risk which could yet be unquantified. If any tree/hedge reduction is required then this should be done sympathetically and at the correct time of year to minimise stress and risk of disease to what remains.
- **Groundwater disturbance and contamination:** residents in Little Bromley who rely on well water as their sole source of drinking water remain concerned about contamination risks from construction work and high volumes of traffic. Any trenching or digging could also affect water tables or the flow of water.
- **Loss of prime agricultural land:** considerable loss of prime agricultural land in Little Bromley including at Norman's Farm.
- **Impact on house prices:** house prices are already being detrimentally affected and this will be an issue for almost every homeowner in Little Bromley, yet no offer of amelioration or a compensation scheme has so far been communicated.
- **Proximity to other electricity infrastructure:** the close proximity of the EACN to the proposed Battery Energy Storage System (BESS) near Ardleigh with its li-ion batteries and the risks of "thermal runaway" should not be overlooked with cumulative impacts being considered and not underestimated.

We are concerned that the above adverse effects for Little Bromley may only be the tip of the iceberg. As a small community we do not have the resources to be able to trawl through the library of DCO documents and 1000s of pages in the time available. We are therefore reliant on the Planning Inspectorate to properly interrogate all the information NG have provided.

4. Unsuitable EACN Site Selection

LBPC are concerned that NG haven't properly considered or evidenced their site selection process. The former RAF Boxford was the only other site considered but it is unclear how the EACN was selected despite the alternative site being close to the A12, adjacent to existing energy and transport corridors and significantly closer to the core N2T alignment. The vague selection "balance of considerations" rationale is not sufficiently transparent. We fully support Tendring District Council in challenging the site selection.

In addition, the EACN site selection does not appear to align with the requirements of the Horlock Rules which include:

- avoiding high-amenity landscapes
- taking advantage of natural landform and vegetation
- minimising visual impact on settlements
- avoiding cumulative industrialisation
- ensuring overhead line connections can be sensitively integrated

The proposed EACN site at Ardleigh is on flat, open countryside with no natural land features providing suitable screening. The cumulative impact of the EACN, Five Estuaries, North Falls, Tarchon converter station and pylons is extreme and cannot be reconciled with Horlock principles. Ardleigh is the wrong location for the EACN.

5. Conflicts With the Tendring Local Plan

The Local Plan identifies Small Rural Settlements where only modest, sustainable development is appropriate. Major industrial-scale energy infrastructure is incompatible with:

- policies on landscape protection
- heritage conservation
- agricultural land safeguarding
- rural settlement character

NG proposals directly undermine these objectives and would permanently negate years of community-led planning.

6. Viable alternatives not properly assessed

There has been no assessment of the impact these proposals will have, specifically on the community of Little Bromley and the effect on the lives of the people who live there; the societal costs, the mental health impacts as well as the actual financial costs of devalued house prices, disruption to businesses, etc. It seems inconceivable that there could not be a way of delivering the nationally significant infrastructure required by this project without such wholesale devastation and destruction.

Alternative proposals of a technical nature, such as whether the most appropriate solution is underground cables or pylons, subsea cabling or HVDC onshore are clearly very difficult matters for us as a small parish council to meaningfully assess or comment on, but NG have not even considered them.

NG appear to have decided on the use of pylons, the route of the pylons and the siting of the EACN based purely its submission that it is the cheapest to build with no consideration given to human and environmental costs. NG's fiduciary duties to make profits for shareholders are in conflict with the sweeping powers of a nationally significant infrastructure project.

7. Requests of the Planning Inspectorate

- **Specific hearing for EACN affected parishes** - as the EACN location and effects are specific to Little Bromley and neighbouring parishes including Ardleigh, we request that a hearing is dedicated to dealing with discussions on this topic as well as the cumulative impacts of other NSIPs to the same area.
- **EACN location site visit** – we invite the Planning Inspectorate to make a site visit to the proposed EACN site and the surrounding area. LBPC will be happy to help facilitate and to work in conjunction with other neighbouring impacted parishes.

8. Conclusions

We ask the Planning Inspectorate to give full weight to:

- the destruction of Little Bromley that this proposed NG NSIP and the cumulative impact with others will unnecessarily inflict;
- the flawed site-selection process and disregard for established siting rules;
- non-compliant consultations;
- conflict with statutory planning policy;
- demonstrable environmental and heritage harm;
- unacceptable cumulative impacts;
- availability of viable, lower-harm alternatives.

Little Bromley Parish Council strongly objects to the Norwich–Tilbury proposals affecting the village of Little Bromley and surrounding area and urges the Planning Inspectorate to:

- 1. Reject the proposed siting of the EACN and associated infrastructure in Ardleigh/Little Bromley; and**
- 2. Request and require NG to undertake a full alternative assessment, including offshore and brownfield options.**

Yours faithfully,

Little Bromley Parish Council