



Little Bromley Parish Council

Response to

National Grid's Norwich to Tilbury

Statutory Consultation 2024

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1. Objection to Norwich to Tilbury Consultation

Little Bromley Parish Council strongly oppose the National Grid Norwich to Tilbury proposal. This proposal particularly affects the village of Little Bromley and neighbouring village of Ardleigh, with its plans for a 23 plus Hectare electric substation on the outskirts of the village of Little Bromley. The area designated for the National Grid (NG) substation is remote and rural with no major roads to allow immediate access. The associated installations and facilities such as temporary access roads, contractor facilities, equipment storage and more will be disruptive for many years.

Additionally, offshore energy providers, North Falls and Five Estuaries, will be running their onshore connections to their own new electric substations within the vicinity of the NG substation. This will further increase the land demand for both additional substations, and underground cable routes. In addition, Tarchon are proposing to build an Interconnector, yet to be sized, to supply electricity to Germany. There are also plans for a battery farm in the same area.

These proposals, if they go ahead, will be a permanent disfigurement of the East Anglian countryside, remove valuable Grade 1 arable land from production necessary for food security, generate significant noise, affect residents and communities' amenities and drive down property values for a large swathe of the affected area.

Much of this area will be under threat if these developments go ahead impacting on livelihoods and businesses (see case studies in paragraph 6).

The National Grid proposal needs a complete rework. You are consulting on a single solution only. When challenged as to why other approaches are not under review you state **Cost** as the only metric. There seems to be no regard for the long-term implications or environmental, ecological and sociological impact of such a scheme. There has been no consideration on the quality of life for residents and impact on our village needs to be a prime consideration.

We are advised that the proposed NG substation at Little Bromley is there to connect the offshore energy provider substations into the Grid. If an offshore under-sea power grid is built for transmission of electricity to areas of the country that have the greatest need, then there is no need for these developments. And if designed with expansion in mind, then further offshore energy providers and nuclear plants can be added as they come on stream with no impact on the East Anglian countryside.

NG's EACN connections given to their 'customers' creates and causes the need for North Falls, Five Estuaries and Tarchon (when the details for it comes forward) to cross Tendring for landing points through to Little Bromley where all the schemes come together. The cumulative impacts of these developments are not being addressed in a properly coordinated manner to avoid years of uncoordinated disturbance and a damaging patchwork of landscaping schemes.

Our Member of Parliament, Sir Bernard Jenkin, has submitted his own response to this consultation, which we fully endorse. He highlights that in their Strategic Options Backcheck and Review National Grid have identified alternative routes to those proposed in the Norwich to Tilbury project. One of these, EAS1, provides a solution in the event that the EACN is removed and is said to be approximately £140 million cheaper than the Norwich to Tilbury project.

2. Impact on Little Bromley and Surrounding Areas

Little Bromley is a village and civil parish in the Tendring district of Essex. The name “Bromley” is Old English for “broomy wood/clearing”. The village lies 9 kilometres east northeast of Colchester and 3 kilometres south of Manningtree. The population was reported to be 426 in the 1941 census, 361 in the 1911 census, 289 in the 2001 census and 253 in the 2011 census. The present population is 341. The main economic activity is arable farming. The impact on the village is catastrophic.

The following is what we know of thus far:

- A minimum of 50m + Wide trenches for underground cabling across local farmland, which will be compulsory purchased.
- There will be at least 3 new substations and an interconnector added to the current substation on the edge of the village, massively increasing it in size. The NG substation alone is equivalent to 20 international football pitches.
- A temporary water attenuation drainage pond
- A separate permanent water attenuation drainage pond
- A temporary haul road stretching across arable farmland and near houses and the Grade II listed Church of St Mary the Virgin. The length of the construction swathe is approximately 3.9 km.
- A new permanent access road and laydown compound is proposed from the centre of the village across farmland to connect to the new substations. This is in close proximity to the village War Memorial and a hedgerow which is listed as a heritage monument. The introduction of the new permanent access roads will forever have an impact on the village as more traffic uses these new roads. There does not seem to be any justification for the new roads to support the substations when in use so these roads should be removed after the building work is completed.
- Widening of Bentley Road, which is the main access road into the village, to accommodate an estimated 424 HGVs movements per day. This will involve removing mature hedging ranging from 30 to 100 plus years old.

This would cause considerable environmental damage as it is a habitat for local wildlife.

- Multiple storage compounds are to be built along Bentley Road, again destroying arable farmland.
- Many properties in Little Bromley have no mains water connection and are reliant on well water. We have major concerns on whether the NG development will affect the water sources in the village and affect these water supplies.
- Little Bromley has a very high water table and during wet periods, flooding and drainage problems occur frequently. We have concerns about whether the NG development will affect these and numerous other water supplies in and around the village and increase the frequency or scale of these events – details can be supplied on request.
- Upheaval for 4-5 years due to the construction work.
- We heard only this week via a local webinar that NG are planning on working seven days a week including Bank holidays during construction – from 7am to 7pm during the weekdays and 8am to 5pm for the weekends and Bank holidays. They will be no break from the noise and dust even potentially on Christmas Day.

All of the above will result in the following issues for Little Bromley residents and businesses:

- Noise - Substations produce a constant buzzing or humming noise, which may become more noticeable in colder months. The prevailing wind direction could carry this noise further, potentially affecting a larger area of the village.
- Dust - Construction and operation of substations will generate dust, which could be carried by wind. This could affect air quality and potentially cause respiratory issues for some residents.
- Environmental - Substations have various environmental impacts, including potential electromagnetic field (EMF) emissions. There are concerns about soil and groundwater contamination from equipment leaks or spills.

- Light pollution – Substations will require security lighting, which will contribute to light pollution in the area.
- Vibration damage to buildings with no foundations (such as the Haywain and other properties near to the routes of the HGVs)
- Access issues for everyday journeys through the village and around the area whilst the work is ongoing.
- Reduction in property values.
- Temporary construction compounds on Bentley Road and visibility splays means loss of established hedgerows/trees. There are numerous mature trees covered by Tree Preservation Orders along the route which should be protected.
- Loss of a substantial amount of Grade 1 agricultural farmland
- The landscape of the village, as we know it, will be lost forever.
- Increased anguish and worry about the proposals causing residents' mental health to deteriorate
- Road closures affecting bus routes and school buses being diverted and how we go about our daily lives.

This list is not exhaustive and will affect everyone in Little Bromley and surrounding area.

The proximity to three areas in particular are recognised as being of great natural beauty. Dedham Vale often referred to as "Constable Country" is celebrated for its unspoiled natural beauty and tranquillity and enjoys protected National Landscape status. The Stour Valley Project Area where rich cultural and historical heritage includes listed buildings, archaeological sites, and landscapes that have inspired artists like John Constable and Thomas Gainsborough. Work is under way to combine the Stour Valley with the Dedham Vale to form an expanded National Landscape and NG has accepted the need to treat the area as if the protection is in place. The Colne Valley and tributaries adds a unique dimension to the area with its picturesque landscapes, rich wildlife, and cultural heritage. Centred around the River Colne, which winds its way through lush meadows, woodland, and farmland the Colne Valley is a haven for wildlife, including a variety of bird species, mammals, and aquatic life. Though not currently protected, the area shares similar natural beauty, history and heritage value to the National Landscape and deserves equal protection.

The Dedham Vale has legal protection, and this extends beyond the Vale itself. It is also embodied in NPS-EN5 which states that 'even residual damage is

unlikely to be acceptable in planning terms' and that the area should be 'avoided altogether'.

Our neighbouring Parish of Ardleigh is also particularly affected as the proposed EACN is on the borders of Ardleigh and Little Bromley. The site of the EACN is poorly chosen with heritage and landscape features resulting in an extremely constrained site. A Grade II Listed Bounds Farmhouse lies immediately adjacent to the EACN, the setting of which will be irrevocable damaged. A cluster of Grade II listed buildings at Hungerdown Farm and Badliss Hall immediately to the North prevent a northern route for cables. The location of these buildings will nevertheless be significantly impacted by the proximity.

3. Environment, habitat and species

Little Bromley parish has a rich and varied wildlife population as identified by wildlife surveys. This includes many species of waterbirds and non-waterbirds. We are very close to the Stour Estuary SSI and Ramsar site, and 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 regularly 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 NG and the other energy suppliers will have a serious impact. 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. It is possible for permanent habitat fragmentation and species isolation to occur due to the substation construction together with the construction of the cable route. The substation construction will bring a permanent loss of an estimated 8Ha of habitat together with the additional loss of the temporary construction compound areas and the cable route during construction.

Some specific harm that will be done is:

- We have numerous Tree Preservation Orders along Bentley Road and beyond that should be protected. Your plans show that these trees will be destroyed:

TPO/92/00040	Opposite Newhouse Farm, Shop Road 1 x Holm 1 x Oak
TPO/91/00021	Welhams Farm, Bentley Road 1 x Horse Chestnut 1 x Silver Maple 3 x Oaks 2 x Ash 6 Oaks
TPO/86/00010	Badley Hall Road 1 x Sycamore 4 x Oaks 3 x Oaks

- **Hedgerows** – In order to widen Bentley Road, it would involve removing mature hedgerows that are over 100 years old. This would cause considerable environmental damage as it is a habitat for local wildlife. It should also be noted that due to the age of Braham Hall, the hedgerow which runs along Bentley Road opposite the War Memorial forms part of the original boundary and, as such, is classed as an “Ancient Monument” and must not be removed, altered or damaged in any way.
- **Wildlife** - Resident from Little Bromley have recorded some of the rarer birds in their gardens. To name a few: the Greater Whitethroat, the Dunnock, Eurasian Blackcap and the Black Redstart which has fewer than 100 breeding pairs in the UK, the Black Redstart is on the Red List of Birds of Conservation Concern. It's also listed as a Schedule 1 species on The Wildlife and Countryside Act. These birds will be under threat.

You are proposing to build a new permanent access road and laydown compound in the centre of the village. These are serious issues that deserve careful consideration:

Location impact: Placing such infrastructure in the centre of a village can be highly disruptive. The chosen location seems to be causing significant worry for residents.

Water supply concerns: The potential impact on well water for properties in very close proximity to the new proposed access road is a critical issue. Protecting local water sources should be a top priority in any development plan.

War Memorial: Our War Memorial is in the process of being registered as an Historic Monument. Preserving such important cultural and historical sites is crucial, and increased heavy traffic could indeed pose a threat.

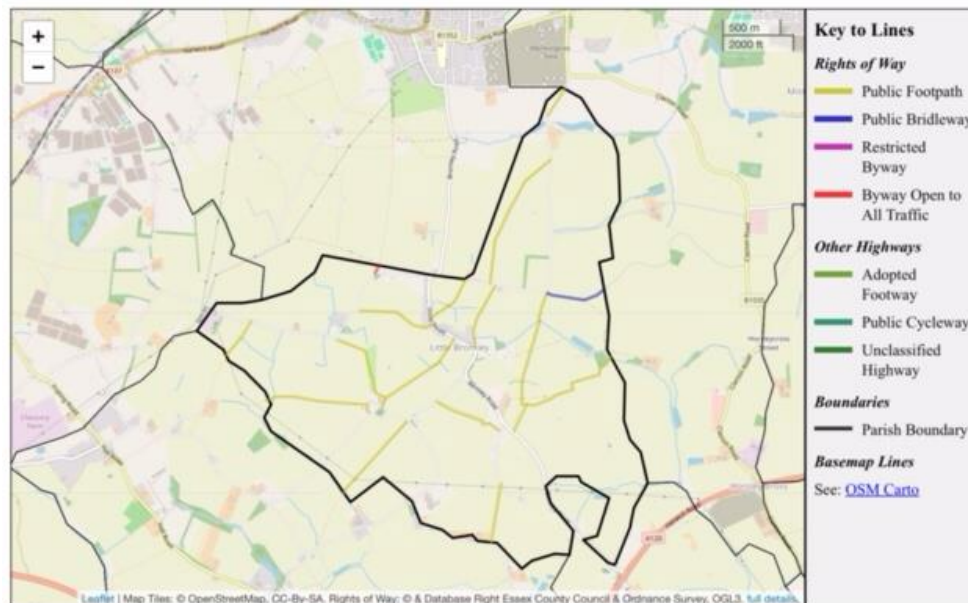
Heritage Hedgerow: Opposite the War Memorial there is a hedgerow that has been listed as a heritage monument. This should be protected.

Given these significant concerns, we request a full environmental impact assessment, particularly focusing on groundwater and well water impacts. In

addition, we ask for a detailed traffic management plan that addresses the protection of the War Memorial. We will be consulting with local conservation groups or historical societies about protecting the War Memorial.

4. Landscape, Public Rights of Way

There are numerous well-used footpaths in Little Bromley that will be impacted by the proposals. It would be interesting to know if you have carried out studies on alternative routes for these footpaths and safety measures.



Public Right of Way/Footpath	Green Space	NG infrastructure
POW 13 POW 14		Permanent access road proposed
Harm: These footpaths will be totally unusable as they will be destroyed by the proposed new access road. These footpaths enable walkers to do a circular route of the village and are very well used. One of the dog bins is situated where NG are displaying numerous notices.		

Public Right of Way/Footpath	Green Space	NG infrastructure
POW 16 POW 17 POW 21		Temporary haul road proposed

These three footpaths are all located where the temporary haul road is proposed and will be rendered unusable due to their location for many years due to the HGV construction traffic. The closure of these footpaths will disconnect them from adjoining paths, potentially disrupting larger walking networks in the area. We have serious concerns that could significantly harm local residents' mobility and safety.

5. Heritage and Archaeology

There are numerous listed buildings and items of a historical nature at risk in this area. Here are some examples:

<u>Ash House</u>	OS Grid: TM092289
<u>Barn Approximately 20 Metres West of Newhouse Farmhouse</u>	OS Grid: TM097285
<u>Braham Hall</u>	OS Grid: TM102283
<u>Chequers Farmhouse</u>	OS Grid: TM101288
<u>Church of St Mary</u>	OS Grid: TM091278
<u>Gig House Approximately 10 Metres North East of Newhouse Farmhouse</u>	OS Grid: TM097285
<u>Grove Farmhouse</u>	OS Grid: TM100278
<u>Jennings Farmhouse</u>	OS Grid: TM088285
<u>Newhouse Farmhouse</u>	OS Grid: TM096285
<u>Pair of Cottages Approximately 10 Metres South of the Haywain Public House</u>	OS Grid: TM101279
<u>Pump at Rear, approximately 3 Metres West of Jennings Farmhouse</u>	OS Grid: TM087285
<u>The Old Rectory</u>	OS Grid: TM094277

St Mary's Church Little Bromley is cared for by the Churches Conservation Trust. The Trust has carried out major repairs and the church is used occasionally for services by the Parish of the Bromleys and events to raise money for the restoration of the church bells.

This little Church was built in the eleventh century and was further beautified in the fourteenth and fifteenth centuries when the splendid tower was built. Of particular interest is the stained glass from the 1930s, which includes pictures of Sir Christopher Wren, Archbishop Laud and King Charles the Martyr, an anonymous gift to remember those from the parish who fell in the Great War. Sir Christopher Wren stands holding the plan of St Paul's Cathedral, and above him are the arms of Wadham College, Oxford. At the time, Little Bromley was a Wadham College living and Wren was an alumnus of the College, hence the connection. Appropriately for this "church in the fields", part of the churchyard is kept as a conservation area.

The proximity of the proposed haul road to St Mary's Church is very worrying as we believe the structure will be damaged and irreparable. We request that a full survey is carried out to protect this Church.



Braham Hall is just one of the many Grade II Listed properties in Little Bromley. Braham Hall has a long history with records dating back to the Norman Conquest. It is recorded that in the 13th Century the daughter of Edward I lived here. The current house was built in 1582 and has several exceptional features, of particular note is a spectacular 16th Century frieze in the principal bedroom. We are particularly fearful that the development of the onshore infrastructure will lead to significant structural damage to this historic and notable property.

There has been a long standing 7.5 tonne weight limit along Bentley Road and Shop Road to protect many of the ancient properties in the area which do not have substantial foundations. It is our firm belief that the vibrations which will be caused by this development will adversely affect Braham Hall and many other properties as mentioned previously.

It should also be noted that due to the age of Braham Hall, the hedge which runs along Bentley Road forms part of the original boundary and as such is classed as "An Ancient Monument" and must not be removed, altered or damaged in any way.

As mentioned previously, the Little Bromley **War Memorial** is in the process of being registered as an historic monument with Heritage England. It was erected many years ago in memory of the men of this and neighboring villages who fought and died for us in the both the 1914-1919 War and the 1939-1945 War. A Memorial Service is held each year to remember them.

The War memorial was refurbished in 2014 by residents of the village and is maintained to a high standard by them.

6. Impact on and proximity to businesses

The joint scheme between NG, Five Estuaries, North Falls and Tarchon will devastate our local area and have a detrimental effect on local businesses. Every business situation is unique and will each have a different set of issues and challenges due to the proposed work. 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.

Some case studies showing, in their own words, how businesses will be harmed are given below:

There follows a selection of Case Studies:

Harlequin, Shop Road

Harlequin was established in 1968 we are a specialist manufacturer making bespoke accessories and garments for couturiers, dressmakers, costumiers and the general public, based entirely here in Little Bromley. I have just this morning cobbled together the attached images which hopefully give a tiny glimpse, not just of the high-profile nature of our work, but also the urgency and immediacy of what we do, which means that we are heavily reliant on being able to access the road network at all times:



- The first picture from the left shows Her Royal Highness the Princess of Wales at the 2024 Trooping the Colour, just a week ago, which marked HRH's first public appearance in a long while; we made the belt, extremely last-minute, here in Little Bromley!
- Next picture shows HM Queen Camilla; buttons made here in Little Bromley.
- Dame Helen Mirren at the D-Day commemoration, earlier this month, with a belt we made.
- We made several belts for the Barbie movie, and all the buttons for every episode and film of Downton Abbey, amongst many others!

- The bespoke bag Catherine took with her to Belize was made of traditional fabric created by the indigenous people and we had to make and return the Bag to Kensington Palace all in the same day.

The closure of the gaps on the A120 has been problematic for us as a business; but the threat from the various NG, Five Estuaries, North Falls and Tarchon schemes, all of which are centred on this village will potentially be catastrophic.

We made a carefully considered strategic decision to move Harlequin to Little Bromley back in 2000. We wanted a non-urban location to build our bespoke atelier workshop, which is first and foremost a creative space, and the unspoilt setting in an ancient village has been perfect for us. We wanted direct access to the A120, just two miles to the south, as well as to the mainline railway station at Manningtree, 2.5 miles to the north.

Although our products are seen all across the world, they are all made here in Little Bromley, by our highly skilled workforce who are all local to the area. We need couriers and delivery drivers to be able to get to and from us rapidly and without delay. But more essentially, we need to be in an environment that is conducive to the creativity that is essential in our line of work.

The proposals by NG, Five Estuaries, North Falls and Tarchon will, by any measure, utterly destroy all that is good and precious about this place. We abhor the proposals.

Neil Stock OBE. Managing Director

Tabor Farms

I am writing with regards to the outline plans of the development of the NG substation in Little Bromley Essex, and the impacts on the business that this will have by taking away and damaging rich, fertile farmland and the access across the farm that will cause huge disruption and loss for the business.

The NG substation site will potentially take 30 acres of high-grade farmland that grows milling wheat that is used for human consumption. This equates to 120 tonnes of wheat. This amount of wheat can make 216,000 loaves of bread as an example, which will result in a loss of £31,200 of income per year. Also, within this site there are proposed plans of a boundary which could have an impact on the well water that is used for irrigation for crops which as a business the land is rented out to other farm businesses, resulting to another loss of income as there will no longer be access to water. This site will also leave an issue of flooding which will damage the remaining farmland left to grow crops. The infrastructure of the site could cause damage to our local land drainage which will cause flooding within the fields in addition to the roads. This will have another impact on loss of revenue due to the flooding of fields which will cause crops to rot and fail.

Another issue that comes with this site is the proposed road widening of the area, Little Bromley may come across as a seemingly quiet village but at peak times of year that is far from it. Road widening and the closure of these roads whilst work is carried out will cause a huge disruption with traffic. We operate large agricultural vehicles which at times can

already be a task when travelling from one side of the farm to the other. This will result to smaller roads being used by everyone which could potentially cause fatalities. If we had to divert the route to one side of the farm by assessing the main roads this would cost the business an estimated £20,000 extra in fuel and time, costs like these are not viable to the business.

On top of this site there is also the impact of the North Falls, Five Estuaries and Tarchon proposed substations. If these sites also get approved that will be an additional 50 acres that the business would lose, that's 200 tons of wheat, 360,000 loaves of bread at an extra £52,000 loss of income per year.

In conclusion the business would suffer a fundamental impact in revenue and loss of land if this proposed development goes ahead. In a time when farming is already at its hardest and food security more important than ever every bit of high-grade agricultural land is precious. This whole project will destroy generations worth of farmland and an environment that can never be replaced.

On behalf of Tabor Farms Ltd

Antony Monger

The Haywain Public House and Bouquet Garni Caterers Ltd

I am writing to express my concerns regarding the reports of new substations, underground cabling and pylons being constructed near my establishment, The Haywain in little Bromley.

There are numerous issues for the village which The Parish Council has done a brilliant job publicising. As a member of the community and business owner, I believe it is important to highlight the negative impact this development will have on my pub, my event company as well as the local area.

Firstly, the construction of substations and pylons in close proximity to my pub will significantly affect the aesthetic appeal of the surrounding environment. The Haywain is predominantly a destination pub in a charming country setting, this is a key factor in attracting both locals and visitors from the surrounding area.

The introduction of large, industrial structures and ground works will detract from the pub's ambiance, leading to a decline in customer visits and, consequently, a decrease in revenue.

Furthermore, the construction process itself is likely to cause substantial disruption. The noise, dust, and increased traffic associated with the building works will create an unpleasant environment for my customers, who visit the pub to relax and enjoy a peaceful setting. This disturbance will result in a loss of business, as customers will most likely choose to avoid the area during the construction period. There have recently been a number of small roadworks and road closures affecting Bentley Road which have had a negative effect on business. A project of this scale will be significantly worse

In the summer months many customers use the footpaths to walk from the surrounding villages, looking at the plans many of these footpaths will be destroyed by the planned works, this will again, have a negative effect on our business.

The presence of substations and pylons can lead to a depreciation of property values in the vicinity. This not only affects my investment in the pub but also has wider implications for the local community. Lower property values can result in reduced business opportunities and a decline in the overall economic vitality of the area. Throughout our business we employ up to sixty staff, who live in the village and surrounding area. With the negative impact on our business the number of staff we employ would undoubtedly reduce significantly, depending on how devastating the effect on footfall to the pub would be.

The Haywain is a Historic Building, the original part of the pub doesn't have foundations. I dread to think what damage the vibration from the constant passing of HGVs and machinery will have on the building.

We do not have mains water supplied to the Haywain, so rely on water pumped from a borehole. I have concerns that there will be an effect on the water table with an infrastructure project of this size.

In light of these concerns, please urge NG to reconsider the proposed location of the new substations and pylons and trenches. The offshore options have to make more sense. I understand the importance of upgrading our electrical infrastructure, but I believe it can be done in a manner that does not negatively impact local businesses and residents. I would appreciate it if you could urge them to explore alternative locations or solutions that would mitigate these adverse effects.

Yours faithfully,
Rob Staples
Bouquet Garni Caterers Ltd
The Haywain

Stow Farm Kennels

As a small family run business, we know that this project will severely disrupt our business. Local routes for our customers will be disrupted daily. We have customers that travel from further afield and they will get lost and confused with all the ground works and diversions that will be going on. We have strict opening times each day to fit in with the strict routines that we have to have at the kennels in order to ensure the smooth day to day running of the kennels and for the welfare of our boarding dogs. We have food deliveries and kennel waste pickups several times per month and this will all be disrupted. We believe that the reason we are so popular is the quite location that we currently have, this will not be the case with all the works that will be carried out not to mention the dust and debris that will be strewn over and around our property.

The chaos to the local community and all the wildlife will be very distressing and also to lose our lovely green spaces, hedges and trees is criminal. In this day and age we should not be ripping down our countryside, we should be protecting it for generations to come. The carbon footprint of this project is also going to be devastating.

You had other options for all of this that would leave our green spaces alone, why were they not considered?

Stow Farm Kennels
Spratts Lane
Little Bromley

Mulleys Farm

Mulleys Farm is an historic Farmhouse in our village of Little Bromley. It is mentioned in the Domesday Book, this farm and its Farmhouse has been in generational ownership for over 200 years. The Farmhouse itself sits a mere 5 metres back from Bentley Road. As the owners and residents of this property we will suffer immeasurable emotional distress from the constant flow of construction traffic and noise generated by the 424 HGVs that will pass directly in front of our home daily. These vehicles will need to both enter and exit the site so in reality this will equate to 848 HGVs passing our door daily.

The likelihood of structural damage to our home is a source of immense concern and stress and should not be ignored

Mary and Stan Roughly
Mulleys Farm

Hiskeys Farm

Hi, as a company (Stuart Davis Ltd) at Hiskeys Farm Spratts Lane Co112PR, having the works done and eliminating 1 of our access and egress roads could be detrimental to us and the livestock. We have multiple deliveries that consist of litter/spare bales/categorised waste and more importantly food and gas deliveries constantly. Any delay to these deliveries would be a problem even a welfare issue. With the amount of fly tips recently with only 1 way in/out this would mean we would have no access until it's moved. This cannot happen! For us and families near to us this would also cut off the bus route from us to our children's secondary school to which they get the school bus, so the bus would no longer run for us. And that is a problem for us as well as many other families. Next door runs a successful and busy boarding kennels, and no access would mean no business for them also.

Also, as well as the obvious concerns which have been voiced regarding nearby and surrounding villages and the countryside if these roads and access/ bulk lorry accesses go ahead.

I hope our concerns are heard.

Regards

James Day

Farm Manager at Hiskeys Farm

7. Impact on Residents - Health and Wellbeing and Proximity to Houses

The impact on residents is catastrophic. NG's plans show that many properties will be severely affected losing land and, in some cases, buildings. As mentioned previously, many properties along the proposed route of the construction works do not have substantial foundations and their properties will be at risk of being destroyed. We request that that you do a detailed survey of these properties with immediate effect. The Haywain Public House and Mulleys Cottage (which is grade 2 listed) have no foundations. Based on the proximity to each other and in turn, the proximity of the Haywain to the road, vibrations from heavy traffic and the number of traffic movements are likely to cause significant structural damage. We can provide you with further details on request. A full survey of all properties affected should be conducted before any decisions are made.

Also, as mentioned previously, many properties in the area do not have a mains water supply or drainage system. Again more work needs to be done by yourselves to determine the damage that the construction works will cause.

The stress and uncertainty of their way of life and livelihood is totally unacceptable and extremely harmful.

Little Bromley has a very high water table and many properties have no mains sewage.

This year, with the amount of rainfall the area has received has really brought to light the severity of our drainage and flooding. This is an issue that has been reported by many residents of the area stretching back for years to our local Highways. It has proved very difficult for residents and farmers with gardens, fields and roads being under water for weeks. The local drainage issues are having a detrimental effect on farming in our area, and we foresee this getting worse with all the construction work planned.

Areas in need of investigation:

Shop Road, Little Bromley



Shop Road, Little Bromley, Rear of Harlequin



Ardleigh Road Little Bromley



Ardleigh Road was impassable for weeks

Ardleigh Road Little Bromley



Grange Road - Proposed field for substations



Junction of Ardleigh Road and Barn Lane



Barn Lane - Example of one of many ditches overflowing

In summary, I hope this evidence is sufficient for NG to think seriously about what implications the construction works and high level of traffic will have, and open investigations and rectify the drainage and flooding issues in the village of Little Bromley before any works commence.

8. Impact on Amenities, Roads and Events in Little Bromley

Little Bromley is used by many running and cycling clubs and hosts annual events to raise money for Charities. The main event of the Village is the 10k Run which will be severely disrupted by the construction works and probably will not be able to take place. In previous years the Corbeau Seats Rally have used Little and Great Bromley as one of their major stages. The annual Tour de Tendring event passes through the village as does the annual Women's Ride London race. This area is used regularly by the Duke of Edinburgh Awards organisation which will be under threat.

As well as for walking and cycling, Bentley Road and all roads through the village are used by horse owners for riding, accessing bridleways and safety led farm schemes which help keep horses off roads, such as East Anglian Farm Rides who have routes within Little Bromley. Horses are not the same as walkers or bicycles, and a cycle/walking route is not going to be suitable for mitigation in the case of horses. Horses are kept in Mulleys paddock, Braham Hall, Little Bromley Hall, as well as other properties in the village. Some with direct access onto Bentley Road for paddock access. Consideration will need to be given to provision of safe pasture, stable and yard arrangements and safe hacking routes which work for owners throughout construction of all projects.

The Tendring Farmers Show takes place once a year on the outskirts of Little Bromley and the main route to the show is from the A120 along Bentley Road and queues for miles.

We fear that all these events will not be able to run once the construction work is started which will have a massive impact on the whole of Tendring.

Although you propose a cycling and walking track along Bentley Road we understand this will not be continuous as there are properties obstructing the development of this. The safety aspect of this proposal needs serious consideration.

The impact on the local road network around Little Bromley 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. 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. There is a real risk of Bentley Road effectively being unusable by local traffic,

such that the village and surrounding towns main link to the A120 will be severed.

The Bentley Road junction at the A120 is a single carriageway and the serves as the main access to Harwich Docks. It had a history of fatal accidents for many years before improvements were made a few years ago, by closing the turn-off on the carriageway to Little Bentley and the building of a new roundabout at the Great Bromley junction. Despite these improvements the road is very busy. There are concerns about its ability to handle increased HGV traffic during the construction period.

Given this situation, there is a need for further traffic management or infrastructure improvements to accommodate the expected increase in heavy vehicle traffic.

There are many farms which need access to their properties and fields at all times of the year, and especially during harvest. We can foresee fatal accidents happening when being faced with heavy HGVs during harvest time.

In addition, the Village bus service runs down Bentley Road and school buses run daily during term time to take local children to their schools in neighbouring villages.

We fear that the longer-term impact of widening Bentley Road will increase traffic for people who would have previously used the B1035 as it will become a cut through.

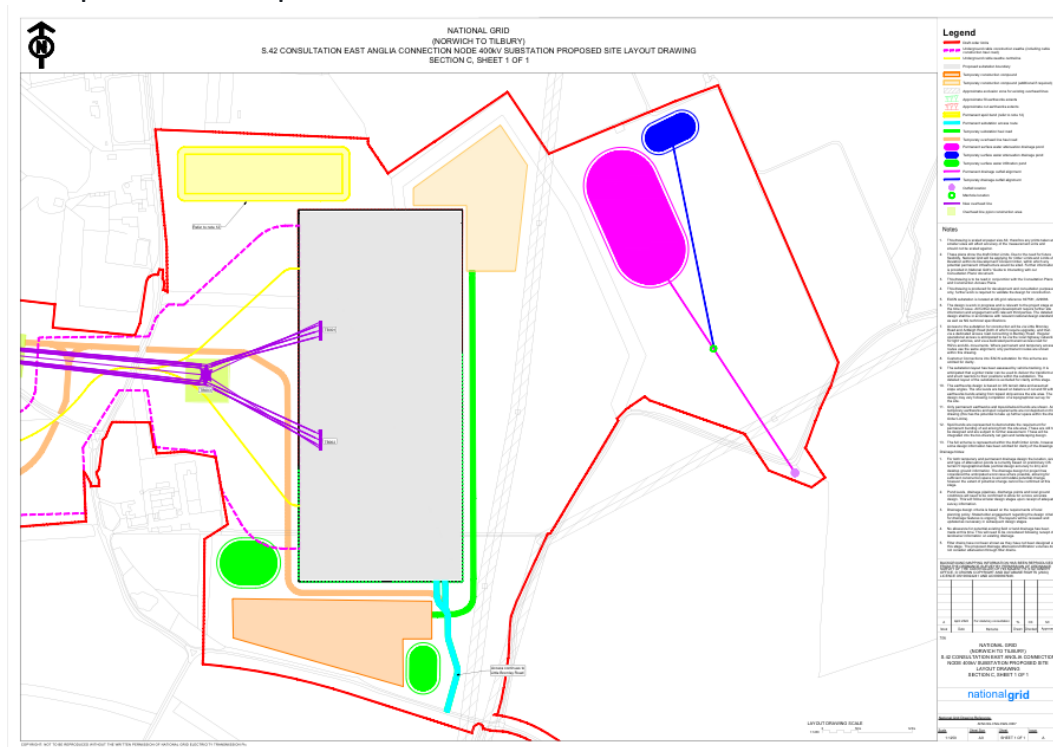
We would interested to know if you have carried out any investigation into the long-term impact and anticipated changes to traffic behaviour based on the widening of Bentley Road. Also, have you carried out any investigations on the cumulative impact of traffic movement considering North Falls and Five Estuaries' proposed access and is there a combined traffic impact assessment for all three projects together?

9. Impact on Farming

Farmers will lose land and livelihoods which have been in the same family for many years. The effects of this are causing damage to their own and families' health and wellbeing.

The exact acreage is not known but the scale is shown on your drawing below. We have estimated this to be 100 acres max option within red boundary.

In addition. North Falls and Five Estuaries together want up to 75 acres in total. This has not been finalised, so we do not know the exact area, but this is the max permanent option loss.



In addition, NG's permanent access road also takes further acreage which we have estimated at 6 to 7 acres.

Tarchon's plans for their interconnector are, as yet, unknown for permanent land loss.

We estimate permanent loss of farmland for substation areas due to NG's EACN in Tendring (creating the need for 'customer' substations and interconnector but not including any permanent loss for pylon bases through Ardleigh) could be around 200 acres plus

NG need to take into consideration the loss of land value their proposals cause when you formulate your business case. The cost calculations as they stand are only partial and show a highly misleading view of the cost/benefits of their intended plans.

“Unfarmable” loss of land during construction is something else entirely.

10. Holford and Horlock Rules and National Policy Statement EN5

The **Horlock Rules** were devised in 2003 and updated in 2006 by NG Company (NGC) plc. The Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions, to avoid or reduce the environmental effects of such developments. Each of the Horlock Rules Guidelines have been reviewed and have been breached and can be found in detail in the Ardleigh Parish Council response. Little Bromley Parish Council fully support all the comments made.

National Grid states that they are at the options appraisal process stage which has been designed to meet your duties and also follows other relevant policy and guidance when making judgments and decisions on the project. You state that this has included consideration of the relevant National Policy Statements, the Holford Rules (which apply to the routeing and design of overhead lines) and the Horlock Rules (which apply to the location and design of substations). **This is clearly not the case as many of the rules have been breached. You have asked for feedback on this stage which we are giving you and hope you take this into consideration.**

National Grid in their current documents have not taken account of changes to **National Policy Statement EN5** (NPS-EN5) which came into force in January 2024 and which contains specific wording designed to put beyond doubt the question of whether cables adjacent to a National Landscape should be underground. Instead, NG have resorted to quoting partial extracts out of context in a manner presumably designed to obfuscate the reality of your obligations. The plans are also contrary to local plan policies in Colchester and Babergh and Mid Suffolk.

The NPS/EN5 states that residual damage to the National Landscape is unlikely to be acceptable. It really is technically infeasible for NG to use underground cables near to Ardleigh, from TB1 to about TB8. The reason for that is that the site of the EACN is bounded by a scheduled monument, a lake, and a cluster of listed buildings immediately to the north, as well as one listed building immediately to the west. That means there is a very narrow cable tract, not wide enough to bury cables on the way in AND in the way out. NG's plans are to bury the cables coming in from the Dedham vale and then build pylons on top of that to carry power going out. **YOU HAVE NO CHOICE.**

Our local MP Sir Bernard Jenkin has set out in detail how NG have wrongly interpreted the requirements of the National Policy Statement and set out misleadingly narrow criteria.

11. Mitigation

Little Bromley is in a unique situation in that the harms to the village will be caused by the heavy construction traffic and the building of haul and access roads and substations from NG, North Falls and Five Estuaries and Tarchon. For Little Bromley the only substantial mitigation would be for the EACN to be located on a brownfield site and that North Falls and Five Estuaries and Tarchon connect offshore.

It is due to the location of the NG EACN that significant harms will be caused, and if this was relocated to a more suitable disused site, it would eliminate the devastation you are proposing for Little Bromley and surrounding villages. The EACN site is on prime BMV Grade 1 farmland and the proposals would include 400 kV / 132 kV transformers and other typical equipment associated with a HV substation. (4.9.16). The operational footprint of the substation is likely to be approximately 520 m x 230 m with heights of approximately 15 m excluding any requirement for landscaping and cable/overhead line connections.

The loss of Grade 1 agricultural land when food security is a major concern is totally unacceptable and there is no meaningful environmental mitigation for the reinstatement for unnecessarily destroyed farmland. In addition, several food producers such as vineyards and fruit and vegetable growers will also be harmed by the proximity of the construction.

Failing an offshore solution being achieved, we would ask for strong restrictions in the use of the roads in and around the area or restrictions in which roads are used for the benefit of Little Bromley and surrounding villages.

In addition, and if individual DCOs are approved, no construction should begin until NG's own DCO is approved. We would strongly suggest that an alternative route be chosen to access the substation site from the A120, rather than using the currently proposed haul road and permanent access road proposed for the centre of the village. All construction work for the schemes must be done together to keep disruption and impacts on residents and businesses to a minimum.

This suggestion is based on the unacceptable traffic impact for Bentley Road and the serious risk of structural impact on properties, listed buildings and monuments, as well as the impact on amenities and safety (walking from the village to the Village pub is a prime example as we have no pavements).

If the decision to build the EACN is accepted, we strongly support the Windfarms and Interconnector coming ashore using direct current. Hence if they used onshore HVDC cables too that would remove the need for the Converter Station which is HUGE part of the infrastructure planned for Ardleigh/Little Bromley. We understand that the converter would still exist, but it would be nearer to where the electricity will be used.

During the digging for the archaeological surveys conducted last year, the noise from the sound of vehicles, especially reversing beeps, were heard all day. This will be much worse during the construction of the substations and exacerbated by 424 HGVs on roads within a few hundred meters of residences. Some of these properties are Grade II listed so cannot instal proper sound insulation. We request the following mitigation actions:

- since this is all about renewable energy and net zero, we insist that all construction work and deliveries are made by battery electric vehicles (which are quieter and cleaner)
- disable reversing beeps and other noise pollution and rely on other safety measures if required
- build sound barriers around the construction sites and on both sides of the roads for the construction
- plant trees along any permanent roads

Since the proposals are likely to significantly affect property values full compensation should be offered for such loss to all affected households, businesses and farms.

The Norwich to Tilbury project will severely impact farming, putting out of use many hundreds of acres of prime agricultural land during the construction phase. Without careful thought and mitigation, it will permanently damage land access, drainage, soil and yields. Landowners and farmers must be appropriately compensated for all economic loss.

In order to minimize the impact to farming operations it is essential that NG carefully time commencement of works in any particular field ensuring that they are able to work appropriately with the weather and minimizing absolutely the duration of time in which they take possession of each parcel of

land and conduct works in each area, returning land to economic use as quickly as is possible.

The interests of local community and landowners/farmers must be prioritised prior to NG's own convenience, even if that results in increased costs for NG.

Construction of haul roads must be minimised to that which is necessary. Instead, agricultural vehicles with larger lower pressure tyres suitable for use on farmland should be used in place of traditional road-suitable construction vehicles. This will eliminate or reduce the need for haul roads and result in quicker, cheaper reinstatement of land together with better soil recovery. For the same reason the width of the construction swathe must be minimised.

NG must investigate and wherever possible adopt new and alternative construction methods/techniques such as 'cable ploughing' which are able to bury cables much more quickly and cause dramatically less damage to farmland, environment and ecology resulting in correspondingly faster recovery times.

Farmland is dangerous, both during farming operations due to the presence of machinery and at other times due to presence of animals, uneven terrain and hidden obstacles. Theft from farms is an increasing issue recognised within the farming and policing community. Hedges around fields provide strong physical and psychological barriers to entry, ensuring that the public do not enter fields except where appropriate via rights of way which are maintained for safety and security. NG plans to remove very significant sections of hedgerow at crossing points over local roads. The number and width of such crossing points must be minimised so as to maintain physical security. Where crossing points occur, the resulting gap must be fenced, and suitable lockable gates put in place ensuring that access around or over the gates is not possible.

12. The Preferred Solution

We are strongly of the opinion that an integrated offshore grid is the only alternative to be considered and is faster, better and cheaper. It is a simple and easier approach and has no blight on landscape, no disruption and upheaval to the landscape, residents etc, they would be praised for their solution rather than hated.

The consultation process to achieve an offshore grid should be restarted and representatives from all Parish Councils affected must be included throughout this process.

NG have repeatedly stated that the Norwich to Tilbury project would follow a different path without the EACN. In turn, the need for the EACN is driven by two windfarms, both of which have offered to connect offshore, together with the Tarchon Interconnector. The Tarchon Interconnector is a commercial venture for the good of its shareholders which, per Arup and ESO does nothing to contribute to UK Energy Security whilst destabilising the domestic network and increasing bills for UK consumers by approximately £5bn. The Tarchon project drives unnecessary infrastructure that impacts the Dedham Vale National Landscape without adequately addressing existing network limitations.

The EACN is not needed, and even if it was it is in totally the wrong place, causing huge damage as it does to our community and to the Dedham Vale. We do not support your proposals at all.

In conclusion, our journey to net-zero can only be successful if it carries national public consent.