

National Grid Electricity Transmission

Response sent via email:

Our Ref: N2T.NonStat.TCon
Date: 15th April 2025
Telephone:

Norwich to Tilbury- Consultation by National Grid Energy Transmission Limited on Changes to the Design / Alignment of the Proposed Route

1.1 Introduction

- 1.1.1 Firstly, thank you for consulting Essex County Council (ECC) and providing briefing sessions for Essex County Council councillors and officers in relation to the targeted consultation and proposed changes to the alignment and detailed design for the proposed nationally significant infrastructure project.
- 1.1.2 This letter relates to the proposed Norwich to Tilbury Nationally Significant Infrastructure Project (NSIP) and the targeted consultation you have undertaken within the county of Essex between Tuesday 25 February and Thursday 27 March 2025. Essex County Council's comments are provided outside of this period in accordance with an extension agreed with National Grid at the beginning of the targeted consultation.
- 1.1.3 The targeted consultation involves 13 locations across the County where a number of localised changes are being proposed to the route and design of the Norwich to Tilbury scheme from that set out in the statutory consultation which took place from 10 April to 26 July 2024. Essex County Council's response to the statutory consultation is dated 25 July 2024.
- 1.1.4 This ECC response and the comments contained within this letter, considers the 13 locations we have been consulted on. Equally it is important to restate our position with regards to the 'in principle' objections and that comments made in the Council's response to the statutory consultation in July last year remain relevant unless otherwise stated.

1.2 In Principle Objections

- 1.2.1 In the response to the statutory consultation held in 2024, Essex County Council (ECC) raised a number of in principle objections. And for want of repeating we maintain that our preferred strategic option remains that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines

(OHL's) and pylons along its entire length. This it is considered, would deliver the best outcome in the interests of safeguarding the amenities of communities and the environment.

- 1.2.2 ECC does however, acknowledge that since last years statutory consultation greater emphasis is being placed by National Government on delivering clean power with a target to deliver at least 95% of electricity generation from clean sources by 2030 as set out in the Clean Power Action Plan (December 2024) with Norwich to Tilbury listed as a key project in Appendix 2 of the Clean Power 2030 report prepared by NESO. Furthermore, the NESO report highlights the importance of Norwich to Tilbury and other projects being delivered by 2030 to transmit clean power from East Anglia.
- 1.2.3 We are also aware of the Hiorns Smart Energy Network Report (November 2023) and the Electricity Systems Operator (ESO) East Anglia Study Report (March 2024) alongside a Government decision not to proceed further with the Offshore Coordination Support Scheme (OCSS).
- 1.2.4 Mindful of the aforementioned reports and policy, ECC considers that a further review of the contracted electricity generation is needed ahead of final submission of the DCO to confirm the need and timescale for the planned Norwich to Tilbury Project and that until this time, credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure in Essex should continue to be fully explored. If this approach can deliver an alternative to Norwich to Tilbury in a timely manner, without risking wider Net Zero, renewable generation, and decarbonisation targets, this is preferable and would be very much welcomed and supported by the Council and the local communities we represent.

1.3 Community Benefits & Social Value

- 1.3.1 As set out in Essex County Council's response to the statutory consultation last year, it is considered Norwich to Tilbury (N2T) will have extensive residual impacts that adversely affect the local economy and environment, as well as the health and wellbeing of communities in Essex, and which cannot be sufficiently mitigated or compensated through the planning regime. Furthermore, it is contended that while N2T will deliver significant benefits at a national level, this will not offset the harm at the local level. ECC consider this to be unacceptable.
- 1.3.2 ECC is therefore of the opinion, that Norwich to Tilbury should deliver significant beneficial socio-economic effects to the host communities but is concerned this issue and especially the associated social value opportunities around skills, training, and future employment, have not been fully assessed by NGET and needs to be as a matter of priority.
- 1.3.3 You will be all too aware that N2T is one of a number of energy NSIPs located in or neighbouring Essex that are required to provide secure, clean, and affordable energy as part of the transition to net zero. Given the national and local skills shortage to deliver these ambitions, the benefits that should be realised from N2T for education, skills, and employment during construction and operation, alone and cumulatively with other NSIPs, are considered significant and action is needed to provide these benefits across Essex, with a particular focus on its areas of greatest deprivation and impact.

- 1.3.4 Nothing in the targeted consultation has acknowledged or advanced the position on this critical issue to enable the Council to reconsider its in principle objection to the scheme on this ground. We find the fact that this has neither been considered or sought to be addressed as deplorable.
- 1.3.5 Mindful of the above, the County Council would strongly encourage NGET to respond positively to the issue of social value and community benefits as set out in our response to the statutory consultation in 2024 particularly having regard to the Governments recently published Community Funds for Transmission Infrastructure. This will certainly be a key issue of disagreement at the Examination process.
- 1.4 Dunton Hills Garden Village
- 1.4.1 The proposed residential development at Dunton Hills Garden Village (DHGV) is an allocated strategic housing site planned to deliver circa 4000 new homes and associated infrastructure. This was set out in the Brentwood Local Plan (the discussions on which as well as the planned DHGV pre date the pre application process for this NSIP) and the DHGV Supplementary Planning Document.
- 1.4.2 An outline planning application to develop 75% of the site was approved by Brentwood Borough Council's Planning Committee in November 2023. This resolution to grant is subject to the completion of a legal agreement. The negotiations on the final details of this agreement are now nearing conclusion which will enable the permission to be issued prior to the submission of the Development Consent Order (DCO). Furthermore, since the Planning Committee resolution, Basildon Council has proposed within the review of their Local Plan, a continuation of the area allocated for residential development at Dunton Hills Garden Village, with a further allocation (H11) potentially delivering up to another 1800 residential units as part of what would be in effect is, a larger sustainable new settlement/ Garden Community.
- 1.4.3 In our statutory consultation response, together with Brentwood and Basildon, the Council highlighted the locally significant effects arising from the proximity of the proposed pylons and overhead power lines to the residential development and concluded NGET should give significant weight to the overall deliverability of these new homes as well as the impact on the viability of the development which needs to deliver affordable housing and supporting infrastructure, consistent with the principles of a designated Garden Village and Policy RO1 of the Brentwood Local Plan.
- 1.4.4 Overhead powerlines and pylons offer no potential to enhance the quality of the landscape or the amenity of DHGV. ECC therefore maintains this will degrade the principles of a Garden Village and considers it is highly likely to lead to a reduction in current and future land value and property prices, which will be to the detriment of the viability and deliverability of housing and infrastructure delivery.
- 1.4.5 Holford Rule 7 states that a new high-voltage route alignment should only be chosen after consideration has been given to the effects on the amenity of '...existing development and proposals for new development'. Furthermore, the same rule goes on to state that when a new line needs to pass through a 'development area' it should be routed to minimise as far as possible effects on development. In this instance the route should be

placed underground. The Norwich to Tilbury route which cuts through this new settlement clearly does not adhere to this Holford rule and is unsound.

- 1.4.6 While the CNP status of this project is acknowledged, NGET are not exempt from the need to balance route selection with good design and impact mitigation. Clearly placing the route underground for the length it runs through / alongside the Garden Village would accord with the principles of good design and minimise the impact.
- 1.4.7 ECC is therefore surprised and disappointed to see that the changes proposed through the current targeted consultation do not respond at all to the concerns raised in our response to the 2024 statutory consultation regarding the impact on DHGV by including proposals which would mitigate the impact on DHGV. It is the opinion of ECC that undergrounding of the proposed overhead transmission line around DHGV, would address this impact.
- 1.4.8 As a result, ECC considers that the 2024 preferred draft alignment is contrary to the principles of good design and impact mitigation for energy infrastructure as required by NPS EN-1 and NPS EN-5. Furthermore, it also considers the proposals are contrary to garden community principles of Policy R01: Dunton Hills Strategic Allocation of the adopted Brentwood Local Plan 2016 – 2033 and that the 2024 preferred draft alignment materially undermines the local plan-making process in Basildon, Brentwood, and Thurrock to the detriment of housing and infrastructure delivery.
- 1.4.9 As highlighted in ECC's statutory response, the strategic importance of DHGV for housing in Brentwood, Basildon and the South Essex Housing Market Area, including the delivery of affordable housing and supporting infrastructure, has to be acknowledged and there must be robust evidence in the DCO submission to demonstrate how this has been taken into account to inform the project design.
- 1.4.10 The need for Councils to plan for housing growth to meet housing targets responds to the Government's mission to kick start the economy by building 1.5 million new homes. While it is acknowledged the Government's missions also seek to make Britain a clean energy superpower by delivering clean power by 2030, it is considered the latter does not override the former and the 'missions' should be mutually inclusive. ECC would therefore have expected all preferred draft alignment to have been informed by the relevant local development plans and specifically in relation to Basildon, the absence of an up-to-date local plan and five-year housing land supply.
- 1.4.11 The Council considers further assessment is required which should lead to significant changes to the preferred route at DHGV to reduce any adverse impacts to land value and harmful effects to housing and infrastructure delivery. ECC does not consider that there is an inherent conflict between national energy and housing policy or national energy and local plan policy that cannot be overcome through robust assessment and application of the mitigation hierarchy, including compensation.
- 1.4.12 To this end, the Council has commissioned Savills to investigate the impact of the pylons and overhead powers lines on the planned viability and deliverability of the garden village development at Dunton Hills and specifically, the impacts of the N2T proposals on property prices and the Residential Gross Development Value (RGDV) of the proposed Dunton Hills Garden Village (DHGV) scheme.

- 1.4.13 ECC acknowledges and appreciates the financial support by NGET to the commissioning of Savills and while this study is currently underway, the date for the final report is beyond the response timeframe for this phase of the targeted consultation. Until the outcome of this study is known therefore, ECC reserves its final position but would reiterate its concern regarding the lack of any baseline assessment undertaken by NGET in relation to the impacts of overhead line and pylon technology at DHGV and the lack of application of the mitigation hierarchy, including compensation, to the likely significant effects from those impacts to the principles of the Garden Village and viability of this strategic housing allocation, including its supporting infrastructure.

1.5 Transportation and Highways

General Points

- 1.5.1 A number of points were raised previously in the response to the summer 2024 consultation on the proposed access routes however it is noted that no changes as a result of these comments have been mentioned in this latest non statutory consultation. Although it is acknowledged that some have been discussed informally and that on-going discussions continue with the Transportation and Highways team which provide more of the detail required to complete the necessary comprehensive assessment of the projects impact on the highway network across the County, in the absence of a finally agreed position, we continue to formally re-iterate the points raised to ensure they have or are being considered:
1. The crossing points and bell mouths show limited detail in the consultation documents. Although we anticipate this will be provided later in the process, for the avoidance of doubt each crossing point and bellmouth requires the following information to be submitted at DCO:
 - Visibility splays within the DCO redline or public highway based on the road speed limit or surveyed speed data.
 - Vehicle swept paths.
 - Traffic Management.
 - Data on the relative use of the access (i.e. total vehicle movements, peak vehicle movements broke down by vehicle class).
 - A Stage 1 Road Safety Audit with designer's response.
 - Road construction.
 2. Further information is sought on whether any management processes may be put in place given the unsuitable nature of the location for high HGV traffic volumes on Wick Lane.
 3. The Council do not support the use of access H25-A2 shown on Section F Sheet 3 due to the potential impacts on the use of the layby in this location. Alternative access locations are required.
 4. It needs to be determined whether any widening is required for a number of accesses including Chatham Hall Lane for accessing H27-A1.

5. Full and detailed consideration together with any alternative measures required, need to be given to any interaction between pylons TB130 to TB132 and Phase 2 of the Chelmsford Northeast Bypass, which has planning permission and is to be implemented.
6. For the Primary Access Route providing access to H28-A2 and H29-A1, measures are required by the Applicant to address the pinch points along the route, including on Rainsford Road to the immediate west of its junction with the A1016. Further measures are also required at the A1060 junction with Park Avenue.

It would be beneficial to understand whether the presence of the haul road would negate the need for any traffic to travel through Chelmsford. If the route is to be used, the Council would want to see peak hour restrictions on HGV movements on this route. The junction of the A1060 with Lordship Road is proposed to be improved as part of an 880 dwelling residential development to the immediate north of the A1060 that currently has a resolution to grant subject to s106 (Chelmsford Planning Application Reference: 21/01545).

7. For the Primary Access Route to H29-A2 and H30-A1 the immediate bend before the accesses on the A414 has experienced a recent road collision resulting in a fatality. Measures are required to be introduced as a result of the road speeds, to mitigate issues of road and public safety.
8. Alternative options are required for accessing H30-A2, including whether traffic from the south can use the existing slip road on the A12 instead of routeing through Margaretting and whether access can be achieved from Writtle Road rather than using Ivy Barns Lane, which is unsuitable.
9. For the bridge strengthening works at F7, consideration must be given to a worst-case assessment of the impacts on the highway network, in the event of the works being undeliverable. There are concerns that this route is used to access Pylons 186 to 201 and the appropriateness of its use and the implications on the remainder of project or the need for alternative routes as a result, need to be fully understood.
10. The location of access H32-A1 on the B1002 could not be identified on the plans provided.
11. Within Section G of the Consultation Plans; National Grid Drawing Reference AENC-NG-ENG-PLN-0008 shows the haul route connecting to the A128 running adjacent to Dunton Hills Golf Course. As this does not form part of the primary access route, we would query its purpose and potential use.
12. The proposed working hours are far beyond what would ordinarily be accepted as reasonable. In the interests of residential amenity, ECC does not agree with working after 13:00 on Saturday or to working on Sunday or Bank and Public Holidays.
13. In terms of highway structures ECC does not support the use of some proposed access locations and routes, which NGET will need to address. It is understood that there are ongoing discussions regarding this issue including requests for further information in relation to the need for road widening and bridge strengthening.

14. Concerns regarding the effect of Norwich to Tilbury on the wider highway network are accentuated by the current number of NSIP projects and other significant developments that are being planned. The likelihood is that many will be active at similar times placing cumulative demands on the network which could have unacceptable impacts for communities and will need to be understood.

1.6 PROW

1.6.1 General

1. Order limits need to be expanded to provide adequate width and opportunity for temporary diversions of PROW during the construction period. This is especially relevant where haul roads or site compounds are expected to coincide with PROW which would result in longer temporary impacts on PROW availability for use.
2. Haul roads constructed along PROW need to have case specific agreements for reinstatement (or not) of pre-existing surface.
3. Closing PROW should not be the default approach to managing PROW during construction. A PROW Traffic Regulation Order (TRO) schedule should be developed for the construction phase to avoid communities being locked in and to ensure they maintain adequate opportunity for countryside access.
4. Opportunities to be sought through landowner engagement to improve other PROW in communities affected by PROW Traffic Regulation Orders (TROs). Particularly focused on looking at removing barriers to access by funded improvements to provide easier access gates and all-weather surfaces.
5. During decommissioning of haul roads, opportunities to be sought with landowners to re-use aggregate materials locally on PROW or with the HA to store aggregate for re-use

1.7 Minerals & Waste

- 1.7.1 The route alignment proposed in the 2024 statutory consultation passed through various Minerals Safeguarding Areas, Mineral Consultation Areas, and Waste Consultation Areas. As you will be aware, a review of the Minerals Local Plan is ongoing but the proposed changes around Ardleigh (Essex 2) and Great Leighs (Essex 7) are noted.
- 1.7.2 ECC reserves its position on this issue pending further progress on the emerging Minerals Local Plan and would again refer you to the comments made in relation to the PEIR and our previous statutory and non-statutory consultation response.

1.8 Sustainable Urban Drainage Systems (SuDS)

- 1.8.1 ECC is the lead local flood authority for any part of the 2024 preferred draft alignment that is within the administrative boundary of Essex.
- 1.8.2 ECC SuDS comments in respect of the localised changes can be read in the following section. In all other respects, the comments made in response to the 2024 statutory consultation remain pertinent unless other agreed subsequently.

1.9 Green Infrastructure

- 1.9.1 ECC currently provides advice on green infrastructure schemes (GI) for major developments. ECC have been consultees on GI since 2018. Although there are no statutory requirements for GI, the 25 Year Environment Plan and Environment Act 2021 will place significant importance on protecting and enhancing GI, accessibility, and biodiversity net gain.
- 1.9.2 In providing advice we look to ensure that adequate provision, protection, and improvements of high-quality GI comply with the objectives and planning principles set out in the following documents:
- Local Planning Authorities (LPA) Green Infrastructure Strategy/ SPD or equivalent green and open space strategies provides further guidance on the LPA's Local Development Plan policies regarding the Council's approach to green infrastructure provision in the local authority area.
 - Essex Green Infrastructure Strategy, 2020, aims to enhance the urban and rural environment, through creating connected multi-functional GI that delivers multiple benefits to people and wildlife. It meets the County Council's aspirations to improve GI and green spaces in our towns, city, and villages, especially close to areas of deprivation.
 - Essex Green Infrastructure Standards, 2022, aims to provide clear guidance on the requirements on both planning policy and planning application and processes.
- 1.9.3 ECC GI Position - There are no objections in principle to the relocation, alignment of pylons in several of the sections, where it reduces the removal of trees and reduce the impact on mature woodlands.
- 1.9.4 ECCs GI team support a strategy that seeks to maximise opportunity to reduce environmental impacts and for habitat retention, enhancement, and creation through the delivery of Green Infrastructure to meet the biodiversity net gain requirements and align with the Essex Local Nature Recovery Strategy objectives.

1.10 General Comment for all sections:

- 1.10.1 ECC is the 'Responsible Authority' for delivering the Essex Local Nature Recovery Strategy (ELNRS) working closely with the Essex LNP to provide direction and ensure key stakeholders are engaged. The draft LNRS went out to public consultation end of August 2024 and is set to be published and adopted in July 2025. The Essex LNRS aims to deliver practical, county-wide initiatives for nature recovery and identifies areas of current particular importance for biodiversity and opportunity locations where habitat creation or improvement can provide multiple benefits for nature and the environment.
- 1.10.2 It is recommended that the Norwich to Tilbury have regard for the Local Nature Recovery Strategy, which will identify areas of current importance for biodiversity and strategic opportunity locations for habitat creation and improvement and off-site biodiversity provision. This will ensure a strong relationship between new development proposals and

relevant strategic opportunity locations to ensure that development contributes positively to biodiversity and the natural environment.

1.10.3 There is the opportunity to contribute to the biodiversity priorities outlined in LNRS, including identifying and protecting key habitats and species. Utilising local habitat maps provided by LNRS can not only help guide the placement (of future projects), but also help in the design of infrastructure projects, minimising ecological disruption and enhancing habitat connectivity. Implementing sustainable management practices, such as creating wetlands, restoring peatlands, and planting trees and hedgerows, can mitigate the environmental impact of NSIPs. Additionally, following statutory guidance and continuously monitoring the environmental impact ensures that infrastructure projects contribute positively to biodiversity and nature recovery.

1.10.4 The maps have not been published and as a result of the consultation it is understood that there may be minor edits to the mapping, but you can email nature.partnership@essex.gov.uk or contact Elias Watson - Local Nature Recovery Coordinator elias.watson@essex.gov.uk to provide further details.

1.10.5 In summary the Essex LNRS includes two main types of maps:

- Areas of Particular Importance for Biodiversity (APIB) Maps: These maps highlight national conservation sites, local nature reserves, local wildlife sites, and irreplaceable habitats in Essex, covering a total of 56,226.27 hectares, which is 14% of the county.
- Opportunity Maps: These maps identify areas in Essex that could become important for biodiversity and help connect existing habitats. They outline potential measures to create larger, better-connected habitats in line with biodiversity priorities.

1.10.6 The opportunity maps in the Essex Local Nature Recovery Strategy (LNRS) are divided into two types:

- All Creation Opportunities Maps: These maps show all locations of particular importance for biodiversity, including areas that overlap with Areas of Particular Importance for Biodiversity (APIB).
- Strategic Creation Opportunities Maps: These maps highlight the top locations within all available opportunities that have the greatest potential to benefit nature and the environment. These strategic sites, selected by Local Authorities, are eligible for a 15% uplift on standard biodiversity units and do not overlap with APIBs. They cover 119,172.53 hectares (30.18% of Essex) and aim to increase green and blue infrastructure to 25% of Essex by 2030.

1.10.7 Appendix 1 to this response provides a detailed view of maps highlighting Areas of Particular Importance for Biodiversity and the Combined Strategic Habitats creation for each section. These maps indicate whether there are strategic opportunities eligible for a 15% uplift on standard biodiversity units and show nearby habitats, such as freshwater and grassland connectivity opportunities.

1.11 Climate Change

- 1.11.1 The localised changes proposed which are the subject of the targeted consultation, raise no new issues in respect of climate change at this time. Please refer to comments made in response to the 2024 statutory consultation.

1.12 Public Health

- 1.12.1 The localised changes proposed which are the subject of the targeted consultation, raise no new issues at this time in respect of public health. Please refer to comments made in response to the 2024 statutory consultation.

1.13 Removal of Obsolete 132kv pylons

- 1.13.1 In general terms, ECC welcomes the proposal to remove a number of 132kV pylon lines operated by UK Power Networks and would encourage National Grid to continue to explore opportunities for N2T to facilitate the removal of further 132kV pylon lines operated by UK Power Networks, to reduce the cumulative visual impact of energy infrastructure, and compensate for the additional LSE to landscape and amenity of the proposed new 400kV power lines.

1.14 Design

- 1.14.1 The Planning Act 2008 requires the Secretary of State to have regard in determining applications for development consent to the desirability of good design. Advice in NPS EN1 Section 4.6 is for applicants to consider the criteria for good design at an early stage when developing projects. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. Further, the Council also draws on the Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Good Design which has been prepared based on good practice and applicants are encouraged to follow the recommendations set out.
- 1.14.2 Good design is not solely about how infrastructure looks, and although these considerations (the aesthetics) are important it is acknowledged that the advice recognises the need for electricity network infrastructure to be safe and secure. Furthermore, Nationally Significant Infrastructure Projects: Advice on Good Design notes that success in good design comes from a combination of securing both good process and good outcomes.
- 1.14.3 The proposals for Norwich to Tilbury involve significant ground-based infrastructure which includes substations. There will be considerable visual impact especially in the vicinity of Ardeleigh. In isolation and cumulatively, there is the potential for the structures to have locally significant effects on the wider visual amenities of the area. It is therefore considered an opportunity exists to ensure the appearance of any substantial structures across the proposal, including at Ardeleigh, are appropriate for the locations through innovative design and approach to external appearance. This would be consistent with Para 4.7.6 of NPS EN1 where it states:

“Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to

demonstrate good design in terms of siting relative to existing landscape character, landform, and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area.”

1.14.4 Good design outcomes should have ‘positive effects on the character of a place and delivery of public benefits and NGET should be aiming to ensure that this is achieved across the scheme.

1.14.5 The Council feels there is an opportunity to be innovative in the approach to design while ensuring the infrastructure remains safe and secure. It is supportive of the concerns raised by Tending District Council regarding the impact of the proposed infrastructure on the environment around Ardleigh. NGET must follow a good design process to ensuring that the infrastructure proposed remains functional while realising the best local design outcomes.

1.15 Airfields

1.15.1 ECC notes that the proposed changes do not appear to lessen the impacts on a number of airfields along the route from overhead lines but notes there are ongoing discussions with regard to the airstrip at Chase Farm which may enable agreement to be reached with the operator.

1.15.2 ECC reserves its position on this issue pending the outcome of these discussions.

1.16 Non-Material Changes

1.16.1 ECC understands that in addition to the changes being publicised and consulted on through the targeted consultation, there are other changes to the scheme design not included in this process. It is understood this is because some are considered to be of such a minor nature that they have no material impact on the proposed development as experienced by residents.

1.16.2 The importance of feedback from residents and community representatives in developing the most appropriate proposal is clearly recognised and it is therefore important, that residents are provided with comprehensive information in order that they can fully understand (and thus comment on), the effect of the proposed localised changes on their properties.

1.16.3 While it is acknowledged these changes may not be the most significant, ECC considers that to local residents who may reside close to them, their significance may be greater, and they should therefore be given an opportunity to comment on them. The concentration of non-material changes may also have a bearing on their materiality and how they are experienced by local residents.

1.16.4 ECC is also concerned about the impact on confidence in the process if residents subsequently identify these changes and raise concerns about their effects. It would also refer to Planning Inspectorate’s Nationally Significant Infrastructure Projects: Advice on Good Design which highlight the importance of transparency in the process and emphasises that a good design process includes an “effective, intentional, transparent and deliverable process”.

- 1.16.5 Officers have previously requested a list of these non-material changes, and it is extremely disappointing that residents are not being made aware of these non-material changes as well as those currently being consulted on.

2 Response to Proposed Changes

2.1 Essex 1

2.1.1 Summary of Proposed Alterations

2.1.2 It is proposed to reposition the underground cable route near Langham to the west of the previous alignment proposed at statutory consultation in summer 2024 to:

- i) reduce the impact on areas of mature woodland and the associated protected species
- ii) minimise the impact on rural business activities
- iii) avoid the removal of trees along tree lined access roads where practicable.

2.1.3 In addition, the proposed change would remove the need for one section of trenchless crossing near Langham Church, reduce disturbance to wildlife and mature woodland, and would reduce tree removal along a number of tree lined avenues.

2.1.4 To accommodate the change, it is also proposed to reposition the haul road and the bellmouths, where project traffic would cross public highways or enter the project site. The haul road would follow the new proposed alignment, with project traffic crossing the unnamed track northwest of Whalebone Corner. The haul road and bellmouths associated with the compound west of Ipswich Road would remain as presented previously.

2.1.5 Other minor amendments to the order limits as well as repositioning the temporary construction compound and laydown area, are also proposed.

2.1.6 Comments

Highways & Transportation	<p>It is noted that there are mature trees and/or vegetation in the vicinity of the following locations that would need to be considered in the access design so as to minimise impact – this would include the physical works themselves to construct the access as well as allowance for adequate junction visibility splays at the junctions with the roads and forward visibility on bends in the road:</p> <ul style="list-style-type: none">• Essex 1 (near Langham); <p>A few of the haul road crossings are over narrow rural lanes which has the potential to cause issues with existing vehicle interactions – namely, vehicles travelling along the rural lane in both directions would have limited visibility when the haul road crossing is being used to judge whether to wait in passing bays for oncoming vehicles. This could result in vehicles waiting on the rural lane either side of the haul road crossing without the ability to pass each other. Consideration should be given to how this is dealt with through design and/or management. This issue is noted for the following haul road crossing:</p> <ul style="list-style-type: none">• Essex 1 – Dacorus Farm Road and Rectory Road;
PROW	<p>There are a few additional PROWs effected by the changes and surveys should be undertaken to include the following:</p> <ul style="list-style-type: none">• Langham FPs15 & 18 additionally effected and FP3 (Essex Way)• Langham FP21 still impacted by temp. laydown area

Built Heritage	<p>The proposed changes in this location include the repositioning of the underground cable route near Langham to the west of the previous alignment proposed at Statutory Consultation.</p> <p>The conclusions drawn in <i>Environmental Implications of Change – Essex 1</i> are agreed. There would be no change to the type or significance of built heritage effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation</p>
Landscape	<p>The Consultation Leaflet says that it is proposed ‘... to reposition the underground cable route near Langham to the west of the previous alignment proposed at statutory consultation in summer 2024.’ ‘ The proposed alignment would divert west after crossing the River Stour... before ... rejoining the route presented at statutory consultation in summer 2024 ...’</p> <p>The ‘Environmental Implications of Change’ report states: ‘The proposed change would alleviate the pinch point between Glebe Farm and Glebe House and would remove effects on vegetation along a driveway and within Langham Hall Estate. However, there would be no change to the type or significance of landscape and visual effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation. ‘</p> <p>It concludes: ‘The proposed change would not materially change the conclusions that were reported within the PEIR (National Grid, 2024) which was published for statutory consultation. ‘</p> <p>Generally, we agree that ‘...overall, there would be no change to the type or significance of landscape and visual effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.’</p>
Archaeology	<p>The conclusions drawn in Environmental Implications of Change – Essex 1 are not agreed in relation to the below ground elements of the historic environment. Although there is a benefit of the relocation of the corridor for the grade I designated church there will be an increased impact on known below ground archaeology. An extensive cropmark complex of probably multi period date extends over a large element of the southern part of the revised corridor with other cropmarks extending in the northern part of the revised route. This has not been identified within the environmental change section of the targeted consultation.</p>
Ecology (falls within Colchester BC)	<p>ECC has not yet been provided with ecological survey information, including any details of potential effects on ecology features associated with St Mary’s Wood. That having been said, it seems that Arcadis has identified a significant bat impact concern associated with the original cable route through the Langham Hall Estate. The altered underground cable route appears to avoid crossing any habitats that show overt bat commuting or foraging potential. This proposed change looks to be a welcome instance of effectual protected species impact mitigation through avoidance.</p>

2.2 Essex 2

2.2.1 Summary of Proposed Alterations

- 2.2.2 It is proposed to reposition the underground cable and overhead line alignments before they enter the East Anglia Connection Node (EACN) substation east of Ardleigh in response to the following comments made in response to the statutory 2024 consultation:

- i) the potential outcome of consultation on the Essex Mineral Plan which could see land to the south of Little Bromley Road allocated as a site for silica sand extraction
- ii) potential effects on fishing and horticulture to the north of Little Bromley Road.

2.2.3 The proposed change would not affect the location of the underground cable or the overhead line at the substation.

2.2.4 The proposed change would locate the underground cables predominantly to the north of Little Bromley Road and passing to the south of the lake at Home Farm, with the overhead line to the south of the road.

2.2.5 Use of the lake and its immediate surroundings (beyond the construction area) would not be restricted, though the proposed repositioning of the cable would increase the impact on horticultural land during the construction stage, as a wider swathe of land would need to be cleared. However, once site restoration is complete, horticultural uses could be reestablished.

2.2.6 The proposed change in alignment, compared to the design presented at statutory consultation, would introduce an additional angle pylon, and pass closer to properties along Morrow Lane. Vegetation loss and effects on recreation at the lake would be reduced.

2.2.7 To accommodate the proposed change in alignment, it is also proposed to move the associated haul road and bellmouth - where construction traffic would cross public highways or enter the project site. We are proposing an additional bellmouth on Home Farm Lane, and the bellmouth on Morrow Lane would be moved 20 m further south of the location previously proposed at statutory consultation in summer 2024 to facilitate construction access to the site. Other minor amendments to the order limits, including repositioning the temporary construction compound to the east, are also proposed.

2.2.8 Comments

Highways & Transportation	<p>It is noted that there are mature trees and/or vegetation in the vicinity of the following locations that would need to be considered in the access design so as to minimise impact – this would include the physical works themselves to construct the access as well as allowance for adequate junction visibility splays at the junctions with the roads and forward visibility on bends in the road:</p> <ul style="list-style-type: none"> • Essex 2 (near Ardleigh) <p>A few of the haul road crossings are over narrow rural lanes which has the potential to cause issues with existing vehicle interactions – namely, vehicles travelling along the rural lane in both directions would have limited visibility when the haul road crossing is being used to judge whether to wait in passing bays for oncoming vehicles. This could result in vehicles waiting on the rural lane either side of the haul road crossing without the ability to pass each other. Consideration should be given to how this is dealt with through design and/or management. This issue is noted for the following haul road crossings:</p>
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	<ul style="list-style-type: none"> Essex 2 – Home Farm Lane and Morrow Lane;
PROW	Ardleigh FP28 construction compound/haul road now not on PROW
Built Heritage	<p>The proposed changes in this location include the repositioning of the underground cable and overhead line alignments before they enter the East Anglia Connection Node (EACN) substation east of Ardleigh.</p> <p>The conclusions drawn in <i>Environmental Implications of Change – Essex 2</i> are agreed. There would be no change to the type or significance of built heritage effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation</p>
Landscape	<p>The Consultation Leaflet says that it is proposed ‘... to reposition the underground cable and overhead line alignments before they enter the East Anglia Connection Node(EACN) substation.’ Also ‘The proposed change in alignment ... would introduce an additional angle pylon and pass closer to properties along Morrow Lane. Vegetation loss and effects on recreation at the lake would be reduced’. And the associated haul road and bellmouth east of Ardleigh would be moved.</p> <p>The ‘Environmental Implications of Change’ report identifies that there would be an additional angle tower compared to the existing design, there would be an additional crossing of the minor road network and the overhead line alignment would be closer to properties to the south along Morrow Lane. ‘Vegetation loss and effects on recreational receptors at the lake would be reduced slightly...’ ‘In terms of landscape, effects on landscape character are likely to be similar’.</p> <p>Generally, we agree with the conclusion of the ‘<i>Environmental Implications of Change</i>’ report regarding Landscape and Visual issues that: ‘<i>There would be no change to the type or significance of landscape and visual effects as a result of the proposed change to the overhead line and underground cable alignment, when compared to the design and PEIR presented at statutory consultation.</i>’</p>
Archaeology	The conclusions drawn in Environmental Implications of Change – Essex 2 are not agreed in relation to the below ground elements of the historic environment. Although there may be no significant difference to the impact on the potential below ground deposits the addition of a further pylon within this area will further impact the setting of the Scheduled Monument of the Ardleigh cropmarks.
Ecology (falls within Tendring DC)	The proposed realignment of the underground cables to north of Little Bromley Road would impact habitats that appear (from Google Earth aerial images) to have slightly more significance than those along the original route, but the difference is expected to be minor. The anticipated changes in ecological impacts from the proposed realignment are not expected to be significant.

2.3 Essex 3

2.3.1 Summary of Proposed Alterations

- 2.3.2 It is proposed to reposition a section of permanent private access near Little Bromley, to the south of the location proposed at our statutory consultation in summer 2024. This access is the proposed permanent access to the East Anglia Connection Node (EACN)

substation near Ardleigh. Traffic would continue to join Bentley Road and Ardleigh Road in the previously proposed locations.

- 2.3.3 This change is being proposed in response to landowner feedback asking us to consider moving the track to follow the edge of a landholding. The proposed plans move the section of permanent private access closer to this boundary and avoids crossing a larger field.

2.3.4 Comments

PROW	Does not alter the position re affected PROW
Built Heritage	<p>The proposed changes in this location include repositioning of a section of permanent private access near Little Bromley, to the south of the location proposed at our statutory consultation</p> <p>The conclusions drawn in <i>Environmental Implications of Change – Essex 3</i> are agreed. There would be no change to the type or significance of environmental effects as a result of the proposed change when compared to the design and PEIR presented at the summer 2024 statutory consultation.</p>
Landscape	<p>The Consultation Leaflet states ‘We are proposing to reposition a section of permanent private access near Little Bromley, to the south of the location proposed at our statutory consultation in summer 2024. This access is the proposed permanent access to the East Anglia Connection Node (EACN) substation near Ardleigh. Traffic would continue to join Bentley Road and Ardleigh Road in the previously proposed locations.’ And ‘The proposed plans move the section of permanent private access closer to this boundary and avoids crossing a larger field.’</p> <p>The ‘Environmental Implications of Change’ report concludes ‘For this specific area of change, having carried out our preliminary assessment, there would be no change to the type or significance of environmental effects as a result of the proposed change when compared to the design and PEIR presented at the summer 2024 statutory consultation.’ Generally, we agree with the conclusion of the ‘Environmental Implications of Change’ report regarding Landscape and Visual issues.</p>
Archaeology	The conclusions drawn in Environmental Implications of Change – Essex 3 are agreed. There would be no change to the type or significance of the archaeological effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.
Ecology (falls within Tendring DC)	We agree with the Environmental Implications of Change statement.

2.4 Essex 4

2.4.1 Summary of Proposed Alterations

2.4.2 It is proposed to reposition the temporary construction access on Wick Lane near Ardleigh, to the west of the location proposed at our statutory consultation in summer 2024 in order to reduce its impact on a nearby property.

2.4.3 The proposed location would continue to meet highway safety standards and ensure construction traffic could safely leave and access the proposed haul road. We are also proposing to reposition the haul road to use this relocated temporary construction access, as well as other minor amendments to the order limits.

2.4.4 Comments

Highways and Transportation	<p>It is noted that there are mature trees and/or vegetation in the vicinity of the following locations that would need to be considered in the access design so as to minimise impact – this would include the physical works themselves to construct the access as well as allowance for adequate junction visibility splays at the junctions with the roads and forward visibility on bends in the road:</p> <ul style="list-style-type: none">• Essex 4 (West of Ardleigh); <p>A few of the haul road crossings are over narrow rural lanes which has the potential to cause issues with existing vehicle interactions – namely, vehicles travelling along the rural lane in both directions would have limited visibility when the haul road crossing is being used to judge whether to wait in passing bays for oncoming vehicles. This could result in vehicles waiting on the rural lane either side of the haul road crossing without the ability to pass each other. Consideration should be given to how this is dealt with through design and/or management. This issue is noted for the following haul road crossings:</p> <ul style="list-style-type: none">• Essex 4 – *Wick Lane <p>*Note previous comments from 2024 summer consultation on this route – there are concerns about the use of Wick Lane for a large number of HGVs due to the narrow, windy nature of the rural lane. In this latest 2025 consultation, the access is to be relocated further west which means the situation is worsened as an additional length of Wick Lane is utilised.</p> <p>Essex 4 shows there to be a proposed permanent right of access for light maintenance. It appears this may already have a gated access and so it currently available for use. However, any changes made to the access or intensification of existing use should include all the information mentioned at item 1 above in the DCO.</p>
PROW	No direct impact
Built Heritage	<p>The proposed changes in this location include the repositioning of the temporary construction access on Wick Lane near Ardleigh, to the west of the location proposed at our statutory consultation.</p> <p>The conclusions drawn in Environmental Implications of Change – Essex 4 are agreed. There would be no change to the type or significance of</p>

	environmental effects as a result of the proposed change when compared to the design and PEIR presented at the summer 2024 statutory consultation.
Landscape	<p>The Consultation Leaflet states, <i>'We are proposing to reposition the temporary construction access on Wick Lane near Ardleigh, to the west of the location proposed at our statutory consultation in summer 2024.'</i> And <i>'We are also proposing to reposition the haul road to use this relocated temporary construction access, as well as other minor amendments to the order limits.'</i></p> <p>The 'Environmental Implications of Change' report concludes <i>'For this specific area of change, having carried out our preliminary assessment, there would be no change to the type or significance of environmental effects as a result of the proposed change when compared to the design and PEIR presented at the summer 2024 statutory consultation'</i>. Generally, we agree with this.</p>
Archaeology	The proposed revised route for access will directly impact a large cropmark enclosure. Archaeological assessment to assess the significance of the below ground deposits will be required to support the submission.
Ecology (falls within Tendring DC)	We agree with the Environmental Implications of Change statement.

2.5 Essex 5

2.5.1 Summary of Proposed Alterations

2.5.2 It is proposed to reposition a line of pylons near Surrex, to the east of the position presented at our statutory consultation in summer 2024 to:

- i) increase the distance from residential properties
- ii) change the haul road to avoid isolating horse paddocks
- iii) to reduce the effect of the scaffolding requirements where the line would cross the A120.

2.5.3 The proposed change would affect the location of the pylons TB71 to TB75 (previously presented at statutory consultation in summer 2024 as TB071 to TB074)

2.5.4 The proposed change would include the addition of one further angle pylon to position the line more evenly between residential properties in the settlement of Surrex and the residential properties at Skye Green. This would remove the need for the haul road to cross the horse paddocks to the south of Surrex. It is also proposed to change the haul roads associated with these pylons so that they follow field boundaries where possible, reducing the impacts on land uses and agricultural activity, along with other minor amendments to the order limits.

2.5.5 To accommodate the proposed repositioning of pylons, it is also proposed to move the bellmouth on Old Road, where project traffic would cross the road, to the east of the location we presented at statutory consultation in summer 2024. This would facilitate access to the construction sites for the relocated pylons.

2.5.6 Comments

Highways & Transportation	<p>It is noted that there are mature trees and/or vegetation in the vicinity of the following locations that would need to be considered in the access design so as to minimise impact – this would include the physical works themselves to construct the access as well as allowance for adequate junction visibility splays at the junctions with the roads and forward visibility on bends in the road:</p> <ul style="list-style-type: none"> • Essex 5 (Surrex); <ul style="list-style-type: none"> ○
PROW	<p>There are a few additional PROWs effected by the changes and surveys should be undertaken to include the following:</p> <ul style="list-style-type: none"> • Footpath 32, Coggeshall within Essex 5 <p>Small change in the location of the haul road over BR42 Coggeshall. FP32 Coggeshall now additionally affected as falls into order limit and crossing protection area</p>
Built Heritage	<p>The proposed changes in this area of the route (compared to the design presented at the Statutory Consultation) have the potential to affect the settings of three listed buildings, Houchins Farm (Grade II*, list entry number: 1123187), Cockerell's Farmhouse (Grade II, list entry number: 1169484) and The Old Cottage (Grade II, list entry number: 1123839).</p> <p>There will be no change to the impact upon Houchins Farmhouse, as the proposals and details of the Order Limits close to this asset have not notably changed.</p> <p>The changes will introduce an additional pylon in this section of the route, drawing the line of the route closer to Cockerells farmhouse than the previous design. The order limits are also enlarged to accommodate a larger section of haul road immediately northwest of the farmhouse, following the line of an existing field boundary. Pylons TB074 and TB075 will be more prominent within the context of the listed building than the previous design iteration and there will be notable changes in the experience of the asset, with the Crossing Protection Area also closer to the listed building than previously proposed. These changes to the route will be visible from The Old Cottage, which overlooks the area, although the building is not depicted on the maps provided within the document associated with this aspect of the Targeted Consultation, <i>Environmental Implications of Change – Essex 5</i>.</p> <p>The conclusions drawn in <i>Environmental Implications of Change – Essex 5</i> are that there will no change to the identified historic environment effects comparative to the design presented at the Statutory Consultation. Whilst I agree with this in terms of the PEIR framework for the assessment of impact, consideration of the additional potential effects on the setting of the listed buildings Cockerells Farmhouse and</p>

	The Old Cottage, are expected to be presented as part of a revised version of the documentation relating to the impact upon the historic environment.
Landscape	<p>The 'Environmental Implications of Change' report states: <i>"The proposed change would result in an additional angle tower when compared to the design presented at statutory consultation, although not in proximity to sensitive receptors. The proposed change would take the alignment further from the small settlement of Surrex. The proposed change would be closer to properties to the south e.g. Cockerell's Farm."</i></p> <p>The report goes on to state: <i>"In terms of landscape, effects on landscape character are likely to be similar"</i>, we agree that the proposed changes will likely result in the same effects as previously proposed.</p> <p>While we generally agree with the report which states that: <i>"There would be no change to the type or significance of landscape and visual effects as a result of the proposed change"</i>, we query the increased impact from TB75 where the pylon is located immediately on the Public Right of Way Bridleway 'Coggeshall 42'.</p>
Archaeology	The conclusions drawn in Environmental Implications of Change – Essex 5 are agreed. There would be no change to the type or significance of the archaeological effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.
Ecology	We agree with the Environmental Implications of Change statement

2.6 Essex 6

2.6.1 Summary of Proposed Alterations

- 2.6.2 It is proposed to reposition a line of pylons near Feering, further to the southeast. The proposed change would affect the location of the pylons between TB77 and TB81 (previously presented at statutory consultation as TB076 and TB079).
- 2.6.3 To reduce close views of pylon TB78 (previously TB077) from nearby homes, it would be positioned to the southeast of its previous location, on lower ground, and would become an angle pylon. The alignment would then run west, including an additional pylon to facilitate the proposed repositioning of TB78. TB80 (previously TB078) would also shift to the south, connecting to TB81 (previously TB079) at a slight angle.
- 2.6.4 The proposed pylon positioning would maintain the field edge positioning presented in the draft alignment presented at statutory consultation in 2024. Access arrangements would also use existing tracks and field boundaries as far as practicable.
- 2.6.5 To accommodate this proposed change in alignment, it is also proposed to make changes to the haul road and the bellmouths. The crossing on Coggeshall Road (Feering) would be repositioned slightly to the north of where it was proposed at statutory consultation in 2024, and the crossing over the B1024 Coggeshall Road would move 130 m south. A new cross over bellmouth on Old Mill Lane, along with other minor amendments to the order limits is also proposed.

2.6.6 Comments

Highways & Transportation	<p>It is noted that there are mature trees and/or vegetation in the vicinity of the following locations that would need to be considered in the access design so as to minimise impact – this would include the physical works themselves to construct the access as well as allowance for adequate junction visibility splays at the junctions with the roads and forward visibility on bends in the road:</p> <ul style="list-style-type: none"> • Essex 6 (Feering);
PROW	<p>Lessen impact of FP4 Feering – moves some pylon locations further away from PROW. Haul road changed but still over PROW + bell-mouth change</p>
LLFA	<p>As a result of the proposed change pylon TB79 will be positioned within close proximity to Flood Zone 3, as such this will need to be considered in future consultations in terms of the repercussions of this placement, mitigation and the requirements for safe working during construction.</p>
Built Heritage	<p>The proposed changes in this location are immediately southwest of the changes outlined in Essex 5. As a result of the proposed changes, the Order Limits and alignment of pylons are amended comparative to the previous proposal set out as part of the Statutory Consultation. This has the potential to affect the settings of listed buildings at Feeringbury Manor (Grade II*, 1123828) and three associated listed buildings, the barn (Grade II, list entry number: 1123829), waterwheel (Grade II, list entry number: 1337602) and ancillary outbuilding (Grade II*, list entry number: 1123828). The listed barn at Frame Farm (Grade II, list entry number: 1337603) and collection of buildings at Coggeshall Hall (Grade II, list entry number: 1306737) and barn (Grade II, list entry number: 1306737) may also be further affected compared to the previous proposed route.</p> <p>The proposed changes to the route will have the largest effect on the buildings at Feeringbury Manor, as the changes include extending the Order Limits to provide what appears to be an access route through the garden area of the listed barn (now a dwelling). In this area, a great deal of change will occur to the immediate landscape of the listed buildings, which includes the River Blackwater and a gentle, agrarian landscape. Within the setting of Coggeshall Hall, the pylons will be closer to the listed building compared to the previous consultation. The new proposal means that TB079, TB080 and TB081 will appear as an almost straight line within the northern outlook from the house, the angle of which is more acute than the previous iteration. This will likely result in the pylons being experienced as a distinct group of three within the landscape and therefore having a greater prominence than the previous iteration of the design.</p> <p>The conclusions drawn in <i>Environmental Implications of Change – Essex 6</i> are agreed, in so much as there will be no additional impact to the setting of designated heritage assets compared to that which has already been</p>

	<p>identified within the PEIR presented at the summer 2024 statutory consultation. This is because the PEIR has identified that there will be ‘significant temporary negative effect’ during the construction phase and ‘significant negative effect’ during the lifetime of the project. Whilst I feel the proposals will mark a notable further change to the setting of the listed buildings identified, in terms of the parameters of the PEIR the level of effect would not be increased.</p> <p>It is anticipated that any forthcoming information will provide commentary on the revisions to the route and that the baseline assessment of the impact upon heritage assets will be updated to reflect the changes.</p>
Landscape	<p>The ‘Environmental Implications of Change’ report states: <i>“The proposed change would introduce an additional pylon, and the alignment would be slightly longer in length than the alignment presented at statutory consultation. The pylon north-west of Coggeshall Hall would become an angle pylon.”</i> The report goes on to state that: <i>“The proposed change would move the alignment further south into lower lying land, in a localised shallow valley area.”</i></p> <p>We broadly agree that effects on landscape would be similar to those at previous consultation. While we note details of the proposed changes to visual effects have been described, no update on visual effects have been included. We reiterate our previous concerns regarding the single viewpoint (Viewpoint 5.02 Feering) selected for this area. And that we <i>“disagree that effects beyond 1 km, effects are less likely to be significant”</i>.</p> <p>In light of the proposed changes, we further our concerns and question the location of the realignment further south from PRoW Footpath – ‘Feering 4’ where there are currently consistent uninterrupted views from the footpath across the valley bottom and to the other valley side. The realignment would alter these views where the length of the Project will dominate the mid-foreground as opposed to previously being closer to the receptor and therefore not dominating main view.</p>
Archaeology	<p>The conclusions drawn in Environmental Implications of Change – Essex 6 are agreed. There would be no change to the type or significance of the archaeological effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation. However, consideration will need to be given to the impact of the setting of the Scheduled Monument with the pylon being located closer to it. Consideration will need to be given to the impact on the setting of the monument.</p> <p>The relocation of both TB76 and TB80 means they are located within an area of potential archaeological remains as recorded on the Essex Historic Environment Record. The pylon bases do not lie within the plotted location of the cropmark features however there is potential for archaeological remains associated with the cropmark features to be present within the area, the cropmark features have not been excavated and their date is unknown. They do not appear to represent highly significant monuments, and the impact could be mitigated by</p>

	archaeological evaluation. A section of the proposed haul road also lies within this area and would also require archaeological evaluation.
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2.7 Essex 7

2.7.1 Summary of Proposed Alterations

2.7.2 It is proposed to extend the project order limits south of Great Leighs, between pylons TB128 and TB133 (previously presented as TB126 to TB131) in response to comments from ECC in respect of its draft updated Essex Minerals Plan which identified that this land could be allocated as a mineral site. Extending the project order limits in this area to the south east would allow for flexibility if the site is allocated in the updated Essex Minerals Plan.

2.7.3 Other minor amendments to the order limits, including repositioning the temporary construction laydown area, are also proposed.

2.7.4 Comments

PROW	No real change in PROW impact
Landscape	<p>The 'Environmental Implications of Change' report states: <i>"The proposed change would introduce one larger angle pylon into the landscape in close proximity to Long's Farm."</i> The Targeted Consultation Leaflet outlines the expansion of the Order Limits to allow flexibility with consideration of the upcoming Essex Minerals Plan and the relocation of the temporary construction laydown area.</p> <p>The EIC Report concludes that: <i>"In terms of landscape, effects on landscape character are likely to be similar"</i> and that <i>"There would be no change to the significance of landscape and visual effects"</i>. We broadly agree that effects on landscape would be similar to those at previous consultation. While we note details of the proposed changes to visual effects have been described, no update on visual effects have been included</p>
Archaeology	<p>No archaeological impacts as a result of the changes have been identified. Based on the Historic Environment Record we would see the proposals having a similar impact to the original proposals, so we have no specific comments of this change.</p>
Ecology	<p>The potential for works to be closer to the Lyonshall Wood LoWS (ancient woodland) is notable though it is reasonable to anticipate that mitigation (buffering) could/would be employed to avoid direct impacts to the designated site.</p> <p>Examination of the original TB126 to TB131 route using Google Earth shows the route intersecting hedgerows at relatively benign (treeless) locations. The proposed expansion of the DOL to the southeast opens the potential for impacts to a different set of hedgerows with trees that are more closely connected to the LoWS. These hedgerows also appear to have far fewer (if any) options for lower impact crossing points.</p> <p>Without any ecological survey information to reference, we are prohibited from reaching a fully informed conclusion on the significance of the</p>

	proposed change with respect to potential ecological impacts. We consider that a realignment of the route further southeast appears to have greater potential for impacts to Priority Habitat hedgerows, veteran trees, bat roost trees, badger setts, and hazel dormice. We will expect that appropriate survey data has been collected to allow an informed impact assessment of the possible expansion of the DOL to the southeast.
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2.8 Essex 8

2.8.1 Summary of Proposed Alterations

2.8.2 It is proposed to change the alignment of pylons between Great Waltham and Little Waltham and in the same area, change the pylon design from full height lattice pylons to lower height lattice pylons to reducing the visual impact of the pylons on nearby conservation areas within Great Waltham and Little Waltham conservation areas, and listed Langleys and associated park and garden.

2.8.3 While the new pylons would be shorter, they are also wider, potentially increasing the visual impact to properties within the immediate area.

2.8.4 It is also proposed to make adjustments to the alignment that was presented at our statutory consultation in summer 2024. This includes repositioning pylons between TB135 and TB142 (previously presented during statutory consultation as TB133 to TB140) to avoid veteran trees and protected species.

2.8.5 Other minor amendments to the order limits are also proposed.

2.8.6 Comments

PROW	Does not seem to be much change in PROW impact – apart from possible impact of lower pylons
LLFA	As a result of the proposed change pylon TB140 will be positioned within Flood Zone 3, as such this will need to be considered in future consultations in terms of the repercussions of this placement, mitigation, floodplain compensation and the requirements for safe working during construction.
Landscape	<p>The Targeted Consultation leaflet states that the applicant is ‘... <i>proposing to change the alignment of pylons between Great Waltham and Little Waltham. In the same area, we are also proposing to change the pylon design from full height lattice pylons to lower height lattice pylons.</i>’ The revisions proposed include:</p> <ol style="list-style-type: none"> 1. The repositioning of 3no. pylons (TB136, TB142 and TB140) and; 2. The use of ‘lower height pylons’ for 7no locations (TB136 to TB142) <p>The ‘Environmental Implications of Change’ report states: “<i>The proposed change would move the alignment further away from Chatham Hall Bungalow but moves the alignment closer to Albion House</i>” and that “<i>The proposed change would also alter some pylon locations, most notably bringing a pylon into closer proximity to Windmill House on Chelmsford Road.</i>”</p> <p>Further “<i>The reduction in height of the pylons would be beneficial in more distant views, such as those from within, and to the west of, Langley’s Registered Park and Garden, from the wider footpath network (including</i></p>

the Saffron Trail and Essex Way), and from the settlements at Great Waltham and Little Waltham, including the Conservation Areas.” However, “In relation to closer views, the benefit resulting from the reduction in height would be balanced out by the wider, heavier (in terms of steelwork) and more squat appearance of the lower height pylons. Furthermore, due to changes in location of the pylons, some would be closer to receptors.”

Our response on the revised proposals are as follows:

Visual Amenity: We broadly agree that the revisions potentially result in similar impact or “*slightly greater due to the heavier and wider nature of the low height structures*”. We also agree that the repositioning results in some pylons being located closer to receptors and therefore impacts could be considered greater than previous proposals.

Essentially, the potential reduction in effects for long distance views has resulted in the increased impact on closer views.

It is worth noting that while the lower height pylons are considered favourable in terms of long distant visual impact, the power lines are presented in a denser cluster, resulting in potentially greater impact from the lines in addition to the aforementioned heavier structured pylons. Furthermore, the lower height pylons also lower the height of the lines and increases sense of enclosure and impact on openness of a flat, open landscape and the perceived tranquillity of the area.

Landscape Character: The repositioning of 3no. pylons would not likely alter the previously judged effects on landscape character, and we generally agree with the findings within the ‘Environmental Implications of Change’ report.

The revisions allow for the retention of mature vegetation which contributes towards the character of the area. As previously stated, while we agree views of the Project would likely be filtered, introduction of pylons will likely degrade the setting of the Grade I Listed ‘Langleys’ (1305533).

We raise further concerns regarding the setting of Grade II ‘Langleys’ Registered Park and Garden and both Great Waltham and Little Waltham Conservation Areas where valued landscape features contribute greatly with riparian landscape associated with the River Chelmer and form both the landscape setting of these Conservation Areas and the contribution towards separation. Langleys Park is specifically mentioned as a landscape feature in the Essex Landscape Character Assessment 2002 identified within LCA ‘Chelmer Valley’ (C5).

Generally, we agree that ‘*...overall, there would be no change to the type or significance of landscape and visual effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.*’

For clarity, in the PEIR the applicant notes the following:

- Significant temporary negative effects to the designated heritage asset, Registered Park and Garden, Langleys.

	<ul style="list-style-type: none"> • Significant permanent negative effects to designated heritage assets, Registered Park and Garden, Langleys . • Significant temporary negative effects are likely to be experienced at the construction stage on landscape character area Chelmer Valley LCA C5, because of construction of the overhead line and associated vegetation loss south of Great Waltham and north of Little Waltham, crossing the River Chelmer. • Significant permanent effects are likely to be experienced at the operational stage on the following LCAs/LCTs because of direct or indirect effects: Chelmer Valley LCA C5 - direct and indirect effects would occur because of the introduction of the overhead line south of Great Waltham and north of Little Waltham, crossing the River Chelmer. • Significant effects are likely to be experienced from the following Visual Receptor Areas within Section F during construction: Area F3 Great Waltham and Area F4 Little Waltham • Significant permanent effects are likely to be experienced from the following Visual Receptor Areas within Section F during operation: Area F1 Great Leighs; Area F2 Peverel's Farm; Area F3 Great Waltham; Area F4 Little Waltham
Archaeology	No archaeological impacts as a result of the changes have been identified. Based on the Historic Environment Record we would see the proposals having a similar impact to the original proposals, so we have no specific comments of this change.
Ecology	If the repositioning of pylons TB135 to TB142 (previously TB133 to TB140) avoids veteran trees and protected species (bat roosts?), that is welcomed, although we do not have access to survey data to confirm that statement. In general, we agree with the Environmental Implications of Change statement.

2.9 Essex 9

2.9.1 Summary of Proposed Alterations

2.9.2 It is proposed to move a temporary construction laydown area from a site close to Ivy Barns Lane to the north-west of the location proposed at our statutory consultation in summer 2024.

2.9.3 The proposed change would not move the construction laydown area any closer to residential properties. The nearest residential property would benefit from improved screening from trees and vegetation as a result of the proposed change in location of the construction laydown area, compared to the screening available at the location proposed at statutory consultation in summer 2024

2.9.4 Comments

PROW	No real difference
LLFA	As a result of the proposed change a highways construction compound is located largely within Flood Zone 3 as such this will need to be considered

	in future consultations in terms of the repercussions of this placement, mitigation, floodplain compensation and the requirements for safe working during construction. Further explanation will be required in terms of what will this compound be used for and if this is to be a temporary or permanent compound
Landscape	The 'Environmental Implications of Change' report states: <i>"The proposed change would move the proposed laydown areas further from property at Handley Green, reducing visual effects during construction, but closer to properties at Ivy Barn."</i> We broadly agree with this.
Archaeology	The conclusions drawn in Environmental Implications of Change – Essex 9 are agreed. There would be no change to the type or significance of the archaeological effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.
Ecology	We expect that mitigation (buffering) would be employed to avoid impacts to the James's Spring LoWS, and appropriate mitigation would be enacted for any works required to the line of mature trees along the access track to the laydown area (e.g. limb reduction). Assuming those points, we agree with the Environmental Implications of Change statement.
General comment	Concern has been raised regarding the lack of information in the public domain about the proposed localised changes and how the changes to the construction lay down areas may be understood by the community in terms of their impact upon highway safety and the local environment.

2.10 Essex 10

2.10.1 Summary of Proposed Alterations

- 2.10.2 It is proposed to take down a section of the existing 132 kV overhead line and replace it with underground cable to allow a line of pylons and a temporary construction compound near Havering's Grove to move to the west of its previous location. This would affect the pylons from TB208 to TB211 (previously presented at consultation as TB205 to TB208).
- 2.10.3 The proposed change would replace approximately 2 km - from north of Bushwood Farm to south of Creasey's Farmhouse - of the existing 132 kV overhead line with underground cable. This would reduce cumulative effects and facilitate the repositioning of the proposed 400 kV overhead line. TB206 would be repositioned to the west as angle pylon TB209 and that the line would turn southeast to reconnect with TB212 (previously TB209).
- 2.10.4 This proposed change would remove an angle pylon, reduce visual effects on nearby properties, and would also move further away from St James' Wood Local Wildlife Site. It would avoid the need for tree removal around a pond to the west of St James's Wood. This would also reduce cumulative effects and increase the distance between residential properties and the proposed pylons and temporary construction compound.
- 2.10.5 It is also proposed that the temporary construction laydown area is relocated to the west (into the next field) to increase the distance from the nearest residential properties. This compound would be accessed from the same location as previously proposed.

2.10.6 Comments

Highways & Transportation	There is no haul road shown to the repositioned temporary laydown near Humes Farm shown in Essex 10.
PROW	Changes to underground cable route – possible lessening of temp. effect on PROW Some pylon locations changing and being located closer to PROW – Brentwood FPs 96 & 98
Built Heritage	<p>The proposed changes in this location are within Brentwood and include a section of undergrounding of the cable route. Compared to the design presented at the Statutory Consultation Design, the underground cables are in addition and closer to the Hutton Village Conservation Area. The pylon route has also changed, with TB209 and TB210 closer to the Conservation Area than the previous proposed alignment. To facilitate this, the order limits are proposed for extension to include additional sections, presumably to provide access to the new underground cable route and revised pylon location.</p> <p>The conclusions drawn in <i>Environmental Implications of Change – Essex 10</i> are that there will no change to the identified historic environment effects comparative to the design presented at the Statutory Consultation. Whilst I agree with this in terms of the PEIR framework for the assessment of impact, consideration of the additional potential effects on the setting of the listed buildings at Hutton House are expected to be presented as part of a revised version of the documentation relating to the impact upon the historic environment.</p>
Landscape	<p>The ‘Environmental Implications of Change’ report sets out the following changes:</p> <ul style="list-style-type: none">• One less angle pylon• Realignment to include the relocation of TB209 to TB211 to the west to reduce visual effects• Repositioning of the temporary construction laydown area to the west• Undergrounding of existing 132kV cable• Additional temporary construction compound to facilitate the undergrounding of the 132kV cable. <p>We generally accept that cumulative effects will likely be reduced as a result of the undergrounding works. However, the expansion of the construction zone to accommodate this will have a greater impact during construction on PROW receptors along Footpath’s Brentwood 96 and Brentwood 98.</p>
Archaeology	The conclusions drawn in Environmental Implications of Change – Essex 10 are agreed. There would be no change to the type or significance of the archaeological effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation. As this is an extra area of undergrounding it is expected that this would become part of the priority areas to be trial trenched to assess the archaeological impact.
Ecology	We agree with the Environmental Implications of Change statement.

2.11 Essex 11

2.11.1 Summary of Proposed Alterations

2.11.2 It is proposed to move a line of pylons near Little Burstead to the east of the alignment proposed at statutory consultation in 2024 and make some adjustments to the haul road and access arrangements. This would affect the alignment of the pylons TB217 to TB220 (previously presented at statutory consultation as TB214 to TB217).

2.11.3 It is also proposed to reposition TB218 (previously TB215), so it is sited on lower ground to the south east as an angle pylon. Pylon TB217 (previously TB214) is now proposed to be changed from an angle pylon to a suspension pylon. The line would then continue from TB218 in a straight line to the southwest. This change has been proposed to reduce the impact on residential properties at Botney Hill.

2.11.4 Additionally, it is proposed to reposition the haul road to the northeast to follow field boundaries and move the haul road crossing bellmouth to the existing farm access to the south of Botney Hill Road. This access is already used by HGVs. To allow HGVs to cross Botney Hill Road without needing to travel along it, the temporary bellmouth access to the north would also be repositioned directly opposite the existing farm access.

2.11.5 Other minor amendments to the order limits are also proposed.

2.11.6 Comments

PROW	<p>There are a few additional PROWs effected by the changes and surveys should be undertaken to include the following:</p> <ul style="list-style-type: none">• There is a PROW running along the existing Chase Farm access which may be directly impacted by the proposed haul road route as shown in Essex 11. Consideration should be given to how this could be mitigated.
Built Heritage	<p>The proposed changes in this location are within Basildon district. As a result of the proposed changes, the Order Limits and alignment of pylons are amended comparative to the previous proposal set out as part of the Statutory Consultation.</p> <p>The conclusions drawn in <i>Environmental Implications of Change – Essex 10</i> are agreed. There will be no additional impact to the setting of designated heritage assets than has already been identified within the PEIR presented at the summer 2024 statutory consultation.</p>
Landscape	<p>The 'Environmental Implications of Change' report states: <i>"The proposed change would have the same number of angle pylons and would move the alignment slightly further away from local community receptors (including at Dunton Wayletts and those located along and accessed off Lower Dunton Road) than the design presented at statutory consultation."</i></p> <p>The maps provided do not correlate clearly with the described changes above where it states the changes: <i>"would move the alignment slightly further away from local community receptors (including at Dunton Wayletts and those located along and accessed off Lower Dunton Road)."</i> Instead, the maps show no change in alignment or direction of travel beyond the south</p>

	of the map where the project continues in the same trajectory passed the aforementioned Dunton Wayletts and others.
Archaeology	The conclusions drawn in Environmental Implications of Change – Essex 11 are agreed. The use of the existing farm tracks will reduce any impact on the below ground deposits including the remains of a cropmark enclosure.
Ecology (changes east of, and boundary of Brentwood DC)	We agree with the Environmental Implications of Change statement.

2.12 Essex 12

2.12.1 Summary of Proposed Alterations

2.12.2 It is proposed to reposition the temporary construction access and laydown area location near Dunton Wayletts to the south of its location presented at statutory consultation in summer 2024. The proposed change would affect access to pylons TB225 and TB226 (previously presented at statutory consultation in summer 2024 as TB222 and TB223).

2.12.3 This change is being proposed in response to feedback which highlighted that future built development could be in the construction stage at the same time as the project and could therefore conflict with the proposed temporary access and compound arrangements presented at our statutory consultation in summer 2024.

2.12.4 The proposed change involves relocating the construction access road to TB226 (previously TB223), and a new construction laydown area for this pylon. The proposed laydown area would be temporary, and the land would be returned to its original use after construction.

2.12.5 As there is some uncertainty over the timing of the built development, we propose to include both access arrangements. Our preferred access route remains the northern access at TB225 presented at the 2024 statutory consultation. This proposed access arrangement would be used in the event that the land used for the northern access at TB225 is being developed and cannot be used.

2.12.6 Comments

Highways and Transport	It is noted that there are mature trees and/or vegetation in the vicinity of the following locations that would need to be considered in the access design so as to minimise impact – this would include the physical works themselves to construct the access as well as allowance for adequate junction visibility splays at the junctions with the roads and forward visibility on bends in the road: <ul style="list-style-type: none"> Essex 12 (South of Dunton Wayletts)
PROW	No real PROW change

Built Heritage	<p>The proposed changes are within Brentwood district and seek to enlarge the Order Limits, comparative to the previous design presented, to allow for an additional access point. No changes to the pylon alignment are proposed.</p> <p>The conclusions drawn in <i>Environmental Implications of Change – Essex 12</i> are agreed. There would be no change to the type or significance of environmental effects as a result of the proposed change when compared to the design and PEIR presented at the summer 2024 statutory consultation.</p>
Landscape	<p>The ‘Environmental Implications of Change’ report appears to be incomplete where the key is not visible following para 1.1.2. The Essex 12 targeted consultation leaflet sets out the changes to include [inter alia], an alternative construction laydown area and an alternative temporary construction access. We broadly agree that there would be no change to the type or significance of environmental effects as a result of the proposed change</p>
Archaeology	<p>No archaeological impacts as a result of the changes have been identified. Based on the Historic Environment Record we would see the proposals having a similar impact to the original proposals, so we have no specific comments on this change</p>

2.13 Essex 13

2.13.1 Summary of Proposed Alterations

2.13.2 It is proposed to reposition the existing UK Power Networks (UKPN) 132 kV line close to Lower Dunton Road. This 132 kV connection is currently above ground and carried on lattice pylons but, to allow Norwich to Tilbury to come forward, it would need to be moved and placed underground. It is now proposed to reposition this underground route to follow more closely follow existing field boundaries on either side of Lower Dunton Road to reduce the impacts on farming and to take account of housing development proposals. To facilitate these works, there would be temporary UKPN compounds at each end of the undergrounding route, which would be accessed via Lower Dunton Road.

2.13.3 Other minor amendments to the order limits are also proposed

2.13.4 Comments

PROW	No significant PROW change
Built Heritage	<p>The proposed changes in this location are within Brentwood district. Changes comparative to the previous design include a rationalisation of the Order to Limits to more closely follow what is assumed to be an access route.</p> <p>The conclusions drawn in <i>Environmental Implications of Change – Essex 13</i> are agreed. There would be no change to the type or significance of environmental effects as a result of the proposed change when compared to the design and PEIR presented at the summer 2024 statutory consultation.</p>

Archaeology	No archaeological impacts as a result of the changes have been identified. Based on the Historic Environment Record we would see the proposals having a similar impact to the original route. As there is a programme of undergrounding this will require trial trenching.
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3.0 Summary & Conclusions

- 3.1 ECC acknowledges the productive engagement on this project to date on many issues and looks forward to working positively with the Applicant as the project progresses towards submission, to try and resolve the outstanding issues prior to submission and subsequently through the DCO process itself.
- 3.2 ECC accepts the direction of travel set out in the Clean Power 2030 Action Plan and the need for network reinforcement that the Norwich to Tilbury NSIP would deliver but is also of the opinion that a further review of the contracted electricity generation is needed ahead of final submission to confirm the need and timescale for the planned Norwich to Tilbury project, and that other options should not be discounted in exploring ways to deliver the network reinforcement with less harmful onshore or offshore infrastructure and less environmental impact.
- 3.2 It therefore retains its strong preference for integrated offshore technology or a coordinated offshore / HDVC undergrounding solution that minimises the need for onshore transmission infrastructure and the need for overhead lines (OHL's) and pylons along its entire length which would eliminate the vast majority, if not all, of the concerns raised about the impacts of the current proposal while delivering the best outcome in the interests of safeguarding the amenities of communities and the environment. If this approach can deliver an alternative to Norwich to Tilbury in a timely manner, without risking wider Net Zero, renewable generation, and decarbonisation targets, it would be welcomed and supported by the Council and the communities it represents.
- 3.3 ECC also considers that the proposal should deliver significant and beneficial socio-economic effects to the host communities. It is critical therefore given the national and local skills shortage to deliver these ambitions, that positive steps are taken to realise these benefits for education, skills, and employment during construction and operation. The fact that this issue has neither been considered or sought to be addressed is extremely disappointing and ECC would therefore strongly encourage NGET to respond positively to the issue of social value and community benefits as set out in our response to the statutory consultation in 2024 particularly having regard to the Governments recently published guidance on Community Funds for Transmission Infrastructure.
- 3.4 As previously mentioned, ECC welcomes the targeted consultation and the opportunity to comment on proposed changes to the design and alignment of the proposed scheme but is disappointed that other more significant changes do not form part of the consultation materials. In particular, there remains concerns over the impact of the proposed scheme alignment and proximity of the overhead pylons, on the viability of the proposed Dunton Hills Garden Village and its ability to deliver the necessary affordable housing and social infrastructure to support a sustainable community and contribute towards meeting overall housing needs.

- 3.5 In terms of the proposed changes set out in the targeted consultation, there are some concerns that have been identified and the following areas are particularly highlighted:

Essex 1	Archaeology
Essex 2	Archaeology
Essex 4	Highways /Archaeology
Essex 5	Built Heritage
Essex 6	LLFA / Built Heritage / Landscape / Archaeology
Essex 7	Ecology
Essex 8	Landscape / LLFA
Essex 9	LLFA
Essex 10	PROW
Essex 11	Landscape / PROW

- 3.6 For Highways and Transportation, there are a range of matters that remain outstanding and of concern. Although on-going discussions are acknowledged, and it is hoped the outstanding concerns can be addressed and / or mitigated, there are presently strong concerns regarding the impact of construction traffic and the cumulative impacts taken together with other development proposed across Essex including other NSIP proposals. As a result, the Council reserves its position until these discussions are concluded.
- 3.7 It is also important to highlight the need to commit to a strategy that seeks to maximise opportunity to reduce environmental impacts and for habitat retention, enhancement, and creation through the delivery of Green Infrastructure to meet the biodiversity net gain requirements and align with the Essex Local Nature Recovery Strategy objectives.
- 3.8 With reference to the aforementioned comments, the Council reiterates its acknowledgement of the positive relationship and engagement to date and looks forward to working with the Applicant as the project progresses towards submission to try and resolve the outstanding issues prior to submission and subsequently through the DCO process itself.
- 3.9 Should you require any additional information or clarification on any issue, please do not hesitate to contact the team.

Yours sincerely,

Graham Thomas
Head of Planning and Sustainable Development

Appendix 1 – List of maps highlighting Areas of Particular Importance for Biodiversity and the Combined Strategic Habitats