

Committee(s): Policy, Resources and Economic Development Committee	Date: 11 July 2022
Subject: East Anglia GREEN Non-Statutory Public Consultation	Wards Affected: All
Report of: Phil Drane, Corporate Director (Planning and Economy)	Public
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Summary

National Grid Electricity Transmission (NGET) has recently held a non-statutory consultation regarding the East Anglia Green Energy Enablement (GREEN) project. East Anglia GREEN is a proposal to build a new high voltage network reinforcement between Norwich, Bramford and Tilbury. This project is a Nationally Significant Infrastructure Project (NSIP).

This report provides an overview of the project and its potential impacts on Brentwood borough. A draft response had been submitted to comply with the consultation deadline and is subject to committee approval in line with the recommendation (Appendix A). The response objects to the proposed East Anglia GREEN scheme on the basis that it has not been clearly explained why an offshore route cannot be provided, direct impacts on the delivery of Dunton Hills Garden Village, and impacts on Green Belt, heritage, landscape and ecology. This is consistent with other responses from affected local authorities, including Essex County Council (Appendix B) and leaders (Appendix C)

This non-statutory consultation is the starting point for the project. There will be further statutory consultation in 2023. The council requests further ongoing engagement with National Grid on the scheme to help resolve its objections

Recommendation

Members are asked to:

R1. Approve the response to the East Anglia GREEN non-statutory consultation, as set out in Appendix A.

Main Report

Introduction and Background

1. National Grid Electricity Transmission (NGET) are proposing network upgrades called the East Anglia Green Energy Enablement (GREEN) project. The East Anglia GREEN project seeks to upgrade the capacity of the electricity network to facilitate an increase in transmission capacity from 3,200 MW of generation capacity (currently) to 15,000 MW of new generation, plus a further 4,500 MW of new connections in the Eastern region. The project would also connect two new offshore wind farms off the Essex coast to the network, as well as having the capacity to connect new additional offshore proposals that may come forward.
2. The proposal is aimed at helping the country to decarbonising its energy economy, increasing UK produced electricity, and facilitating net zero emissions by 2050, which is a government target. The project in its entirety proposes the following:
 - a) A new 400 kV electricity transmission line over a distance of approximately 180km and a new 400 kV connection substation.
 - b) The reinforcement comprises mostly of overhead line (including pylons and conductors) and underground cabling through the Dedham Vale Area of Outstanding Natural Beauty (AONB) and a new 400 kV connection substation in Tendring district.
 - c) Cable sealing end compounds to connect sections of the underground cable with the overhead lines.
3. The preferred route for the 400kV powerline would enter Brentwood borough to the northeast of Ingatestone (from the Chelmsford area) and broadly run close to the borough's eastern boundary with Basildon borough.
4. As a Nationally Significant Infrastructure Project, the planning process will be overseen by the government through a specialist unit of the Planning Inspectorate. National Grid will be seeking a 'Development Consent Order' (DCO) from the government, as opposed to planning permission from the local planning authority. Brentwood Borough Council, like the other affected councils, are classified as 'Host Authorities' for the purposes of the Planning Act 2008 and The Infrastructure Planning (EIA) Regulations 2017. As a Host Authority, the council plays an important role in helping to shape and assess the impacts of the proposals. However, the Planning Inspectorate are the determining authority for the development.

5. The project is currently at a non-statutory consultation stage. It is expected that National Grid will undertake extensive community engagement and liaison with the host authorities between now and the submission of the Development Consent Order. The Council will be seeking to agree a Planning Performance Agreement (PPA) with National Grid to agree project inputs and outputs, timeframes and reimbursement of relevant council costs.
6. The currently anticipated timescales for the Development Consent Order process are as follows:
 - a) Statutory Consultation during Q2 2023
 - b) Environmental Impact Assessment from Q3 2022 to Q2 2024
 - c) Submission of Development Consent Order application to the Planning Inspectorate during Q3 2024
 - d) Examination, recommendation by the Planning Inspectorate and decision by the Secretary of State from Q4 2024 to Q2 2026
 - e) Build by National Grid commences during Q1 2027
 - f) Operation begins in 2030
7. The council has been and will continue to work closely with all of the affected local authorities impacted by the proposed preferred route, through forums such as the Essex Leaders and Chief Executives forum, and Association of South Essex Local Authorities (ASELA). This has enabled the sharing of concerns and consistency of response with one voice, aligning the authority with colleagues in Essex, Suffolk and Norfolk.
8. With its partners 'Place Services', Essex County Council has led on the coordination and submission of a technical response to the consultation on behalf of affected authorities in Essex, Suffolk and Norfolk (Appendix B). This sets out a strong objection to the East Anglia GREEN proposals as currently proposed.

Issue, Options and Analysis of Options

Project Proposals in Brentwood Borough

9. The proposed route area enters Brentwood borough to the northeast of Ingatestone, from the Chelmsford area. Running north-south it crosses the A12, the railway line and Stock Lane, before passing adjacent to the grounds of Ingatestone Hall. The route then travels south within the borough, passing midway between Hutton on the west and Billericay on the east, crossing Rayleigh Road to the west of Havering's Grove. Continuing southward largely through agricultural land, running broadly parallel to the Brentwood/Basildon boundary, crossing in places. The route crosses the A127 and proceeds to

track the borough eastern boundary passing through the Dunton Hills Garden Village site, before exiting the borough by crossing the railway line on the border of Thurrock district. It is stated that within this section the proposed route will be made up of new overhead powerlines supported by steel lattice pylons.

10. National Grid is undertaking a phased options appraisal and assessment process when developing proposals for reinforcement of its network. The process seeks to meet National Grid duties and follow relevant policy and guidance when deciding on the project. National Grid is currently at the options identification and selection stage of the process and is seeking feedback during this consultation on the work carried out to date.
11. The Corridor and Preliminary Routeing and Siting Study Report (CPRSS), outlines a number of different types of alternative options available, which includes technology for offshore connections. However, the appraisal of strategic options has concluded that the East Anglia GREEN project should be comprised of onshore reinforcement with a new 400kV onshore line.
12. There has been limited discussion on the consultation documents or offshoring cabling options, suggesting that the proposed route option has not been fully considered or open for full scrutiny by the public. This is a point raised within the council's draft consultation response (Appendix A, paragraphs 5 & 6), and stated in the response from the Chair of the Essex Leaders and Chief Executives Group (Appendix C), amongst others. In addition, other borough specific issues are identified below. Until it can be demonstrated that the options for an offshore approach to delivery of the transmission network have been thoroughly considered, it is proposed that the council should object to the proposed development.

Borough specific Issues

13. As referred to previously a response, coordinated by Essex County Council in partnership with 'Place Services', on behalf of the affected local authorities is focused on the wider archaeology, heritage, conservation, and ecology implications of the proposal (as set out in Appendix B). In addition to this joint high-level response the BBC response emphasises the need for further consideration of the following key issues of local significance (as set out in Appendix A):

Dunton Hills Garden Village

14. The council's draft response sets out disappointment with the lack of pre-engagement from National Grid prior to publication of the consultation

documents. Most notably, this has led to a lack of recognition of the proposed route passing through new development planned at Dunton Hills Garden Village, which has recently been allocated in the Brentwood Local Plan alongside a live planning application and several years' worth of collaborative masterplanning (of which National Grid were involved).

15. Through its consultation response, the response highlights fundamental inaccuracies with the East Anglia GREEN options appraisal (CPRSS), which incorrectly concludes that there are no local plan allocations directly affected by the proposed route (Appendix A, paragraphs 9-14).
16. The preferred route of the transmission line has the potential to seriously undermine the delivery of Dunton Hills Garden Village (which is to provide 21% of the boroughs total housing provision to 2033), and in doing so will have clear negative implications for housing delivery in the borough and across South Essex. This is an area of acute housing need and affordability pressures, coupled with strong projected population growth.
17. The response supports a separate response submitted by CEG, the lead developer for the garden village, which provides a more focused and technical impact assessment of the preferred route.

Green Belt

18. The proposed route passes through Green Belt land within the borough. The scheme will pose significant impacts on the openness of the Green Belt and the council has raised concern in this regard. This is a point also made by other Essex authorities, including Basildon Borough Council informed by engagement between Brentwood and Basildon councils.

Heritage

19. The proposed route will pose a significant impact on the setting of Ingatestone Hall and Heron Hall and potentially direct impact for significant Ancient Monuments. The council has stressed the importance of a full assessment of the impact of the proposal on the historic, architectural, and associative value of these heritage assets and all other effected heritage assets across the route.

Landscape and Ecology

20. The council has highlighted the potential landscape and visual effects on Thorndon Country Park and requested that information on views be provided, from which need to be carefully considered and assessed. In addition, the

response highlights the need to carefully consider the sensitivity of the Writtle Forest Ancient Landscape, through which the route passes close to.

Summary of response

21. In summary the council's response objects to the proposed East Anglia GREEN scheme as presented, with an emphasis on the below considerations/options:
 - a) To minimise onshore infrastructure and the associated impact on communities and environment, the council's strong preference is for an offshore approach to deliver the transmission network.
 - b) The council request that National Grid reconsider its evaluation and selection of the preferred corridor prior to undertaking statutory consultation.
 - c) In the event that the need for onshore cables can be demonstrated and that rerouting not be reassessed to be a favourable option, the council requests that the proposed transmission line is moved further to the east away from the Dunton Hills Garden Village allocation, with due consideration given to additional mitigation measures, principally being undergrounding or the use of T-pylons.
22. The council requests further ongoing engagement with National Grid on the scheme to help resolve its objections.

Consultation

23. National Grid has undertaken a non-statutory consultation for an eight week period, from 21 April to 16 June 2022. The council's response (Appendix A) was submitted to comply with the consultation deadline and is subject to committee approval.
24. National Grid publicised the consultation via a range of measures, including sending out newsletters to residents, parish councils, local authorities and businesses within a 1km radius from the edge of the preferred option corridor. The non-statutory consultation included webinars, face to face events and information points open to the public. This included a public information event held at Ingatestone and Fryerning Community Centre on 28 April 2022, where National Grid staff were in attendance to discuss the project and answer questions.
25. This non-statutory consultation is the starting point for the project. There will be further statutory consultation in 2023.

References to Corporate Plan

26. The Corporate Strategy identifies priority areas, which include protecting our environment, growing our economy, improving housing, and developing our communities. The project affects strategic priorities through its proposals.

Implications

Financial Implications

Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources)
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27. The council will commence negotiations with National Grid to cover the costs of engaging in the project via a Planning Performance Agreement (PPA). This is to cover the local planning authority costs associated with assessing the impact of the project at the various stages.

Legal Implications

Name & Title: Amanda Julian, Corporate Director (Law & Governance) and Monitoring Officer
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28. The Planning Act 2008 sets out provisions for the Nationally Significant Infrastructure Project pre-application process, including a duty for the proposer to consult parties including local authorities and communities affected.
29. The comments submitted by the council respond to this non-statutory consultation and the council will need to continue to engage in the project as it progresses with further statutory consultation.

Economic Implications

Name/Title: Phil Drane, Corporate Director (Planning and Economy)
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30. The proposed route puts the delivery of Dunton Hills Garden Village at risk in that it reduces the development and therefore viability, among other things. That would have negative implications for housing delivery in the borough and across the South Essex, which by extension impacts specific employment land to be delivered as part of the garden village as well as the wider economic benefits that would be reduced or lost entirely. Therefore, it is important that the council identifies these issues and engages with National Grid to help identify alternatives.

Equality and Diversity Implications

Name/Title: Kim Anderson, Corporate Manager (Communities, Leisure and Health)

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31. Ongoing consultation undertaken by National Grid will need to include consideration of equality and diversity.

Other Implications (where significant) – i.e. Health and Safety, Asset Management, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

32. The council has sought confirmation in its response that full consideration be given to health implications associated with the proposed route and wider project.

Background Papers

- Supporting information for the East Anglia GREEN project is provided on the National Grid website at: <https://www.nationalgrid.com/electricity-transmission/network-andinfrastructure/infrastructure-projects/east-anglia-green>

Appendices to this report

- Appendix A: Brentwood Borough Council response to the East Anglia GREEN project, non-statutory consultation, June 2022
- Appendix B: Essex County Council response to the East Anglia GREEN project, non-statutory consultation, June 2022
- Appendix C: