

## **Brentwood Borough Council response to the East Anglia Green Energy Enablement (GREEN) project, non-statutory consultation, June 2022**

1. Brentwood Borough Council welcomes the opportunity to engage with National Grid on the East Anglia Green Energy Enablement (GREEN) project to build a new high voltage network reinforcement between Norwich, Bramford and Tilbury. This is a complex project and one which as proposed, has a direct impact upon Brentwood borough, with part of the preferred route for the new high voltage overhead transmission line proposed to go through the east and southeast of the borough.
2. The council recognises the significance of the proposal and is grateful for the opportunity to provide feedback ahead of the formal stage of statutory consultation, which as noted, is proposed to take place in 2023.
3. Please note, this response forms only part of the council's representation to the consultation. In addition to this response a joint consultation response, coordinated by Essex Place Services on behalf of the affected Local Authorities, has been produced with a focus on the wider archaeology, heritage, conservation, and ecology implications. The council has also engaged with adjoining authorities who will be making similar responses and is a partner in the Association of South Essex Local Authorities (ASELA), who should be engaged going forward about this nationally significant infrastructure project.

### **Principle of development**

4. The council is disappointed with the lack of pre-engagement from National Grid prior to publication of the consultation documents. Most notably, this has unfortunately 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 (that National Grid have been involved in). A point emphasised within the consultation response from the Chair of the Essex Leaders and Chief Executives Group.
5. 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. There is limited discussion in the

consultation documents of any merits or otherwise in offshoring the cabling, indicating that this route option has not been fully considered at present.

6. Until it can be demonstrated that the options for an offshore approach to delivery of the transmission network have been properly considered and the impacts and concerns highlighted within this response have been addressed, Brentwood Borough Council objects to the proposed development.
7. We endorse the response made by Gateley Hamer, on behalf of CEG Land Promotions Ltd (the principal land promoters for the allocated site at Dunton Hills Garden Village). This sets out in detail the impact of the proposed high voltage development on the delivery of this site allocation to deliver much needed new homes, jobs and supporting community facilities.
8. Notwithstanding the council's position of objection, and without prejudice to that position, the following technical and issue specific comments are offered.

### **Critique of 'Corridor and Preliminary Routeing and Siting Study (CPRSS)**

9. The council wishes to bring attention to the fact that there is a fundamental inaccuracy/oversight in the options appraisal in relation to corridor section 'R' (a section routeing north of Colchester and to the south of Ardleigh Reservoir). Appendix D of the Corridor and Preliminary Routeing and Siting Study (CPRSS) (April 2022) states *"In terms of local plan allocations in the Colchester, Braintree and Brentwood LPA areas there are no local plan allocations directly affecting the section"* (D15). Following years of extensive consultation, the Brentwood Local Plan was adopted on 23 March 2022. The Local Plan contains strategic allocation R01 'Dunton Hills Garden Village', which has an indicative capacity for around 4,000 homes together with necessary community, retail and employment development and comprehensive infrastructure to support a self-sustaining, thriving and healthy garden village. Section R within the CPRSS runs directly through the Dunton Hills Garden Village allocation site, rendering this statement within the options appraisal inaccurate and calling into question the robustness of the options appraisal through which the preferred route, which includes section 'R', has been identified.
10. It's noted within the CPRSS document itself, reference is made to the Dunton Hills Garden Village allocation, as extracted below:

*"Section R also passes through an area allocated for residential development, referred to in the Brentwood Emerging Local Plan as the Dunton Hills Garden Village. This area, to the west of Basildon, has two existing overhead lines passing directly across it and as a result it is considered that high voltage overhead lines have not been seen as a barrier to development coming forward on this site. This allocation is therefore not considered to be a differentiating factor between the options."* (Page 117)

11. As referred to previously, the Brentwood Local Plan was adopted on 23 March 2022 within which Dunton Hills Garden Village forms a strategic allocation. The Council wishes to bring attention to the fact the conclusions drawn within this statement are not correctly made, because the adopted Dunton Hills Garden Village allocation site's redevelopment is predicated on the undergrounding of the existing 132kV + 11kV overhead lines that run across the site. This undergrounding will be required to deliver the site's projected quantum and quality of development, which has been informed by comprehensive masterplanning work that forms part of the Council's Local Plan's evidence base, of which National Grid have been involved.
12. It is further noted the CPRSS makes no reference to the fact an active planning application for the majority of the garden village has been received (validation date 13 September 2021) by the council as local planning authority and is in the process of being determined.
13. This evaluation of the CPRSS suggests a route was chosen with little knowledge as to what exists and what development is planned in the borough. As a result, National Grid has yet to assess the comprehensive feasibility of undergrounding the proposed 400kV power lines within the Garden Village site, and we are aware that in consequence there is possibly a need to explore alternative options such as an offshore approach to deliver the transmission network or completely circumventing the Dunton Hills Garden Village site.
14. Given the strategic importance of the garden village, its allocation within an adopted local plan, and in light of the identified inaccuracies, the council requests that National Grid reconsider its evaluation and selection of the preferred corridor section 'R' prior to undertaking statutory consultation.

### **Impact of the proposal on Dunton Hills Garden Village**

15. The preferred route of the transmission line has the potential to seriously undermine the delivery of the adopted Dunton Hills Garden Village allocation (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 the South Essex Housing Market Area. An area of acute housing need and affordability pressures, coupled with strong projected population growth. The delivery of this allocation being a public interest point.
16. It's not simply the physical impact of the overhead line but the 'stand offs' creating no build areas, on a site that is already constrained by a gas main running across the site, with a "no-build" easement strip. The potential for further infrastructure constraints within the allocation site risks prejudicing the quantum of development that can be achieved, the garden community principles upon which the allocation was formed, as well as Brentwood's growth strategy. Viability of the allocation will be adversely affected by virtue of the scheme, with a detrimental effect on outlook from any properties

towards what will be large pylons. Again, serving to undermine the garden community principles.

17. To this extent in the event that the need for onshore cables can be demonstrated and that the rerouting of corridor section 'R' not be reassessed to be a favorable 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.

### **Other impacts**

18. As referred to previously a joint response, coordinated by Essex Place Services, on behalf of the affected local authorities is focused on the wider archaeology, heritage, conservation, and ecology implications of the proposal. In addition to this joint high-level response the council wishes to emphasise the need for further consideration of the following key issues of local significance (please note, this list is not exhaustive and does not prejudice the consideration of any other issue):

- a) **Green Belt:** It is noted the proposed route passes through Green Belt land within the borough. Clearly the scheme will pose significant impacts on the openness of the Green Belt and the council wishes to raise concern in this regard. The council acknowledges the starting point is for 'overgrounding' of cabling and infrastructure on schemes of this nature, other than in extremely sensitive areas such as Areas of Outstanding Natural Beauty (AONB). However, undergrounding appears to have been ruled out on grounds of cost, but there is little evidence showing that a conventional viability assessment has been undertaken. Furthermore, it's noted there is limited discussion of any merits or otherwise in offshoring the cabling. In order to minimise onshore infrastructure and the associated impact on communities and environment, the Council requests that an offshore approach to deliver the transmission network be fully considered, and its assessment set out clearly within the supporting documentation.
- b) **Heritage Assets:** It's noted the proposed route passes through the grounds of Ingatestone Hall (Grade I listed) and passes within close proximity to Heron Hall (Grade II listed). These areas contain both above ground built heritage of high designation status but also contain Scheduling's for which Historic England act as statutory consultees. The scheme as proposed will pose a significant impact on the setting of these listed buildings and potentially direct impact for significant Ancient Monuments and as such the council wishes to stress the importance of a full assessment of the impact of the proposal on the historic, architectural, and associative value of these heritage assets (above and below ground) and all other effected heritage assets across the route. Detailed advice with the regional team at Historic England Cambridge is advised.

- c) **Thorndon Country Park:** The council wishes to highlight the potential landscape and visual effects on Thorndon Country Park, the views from which should be carefully considered and assessed. The site is on the Historic England Register of Parks and Gardens of Special Historic Interest (Grade II\*) as well as a regionally important country park.
  
- d) **Writtle Forest Ancient Landscapes:** It is noted the proposed route passes close to this natural heritage asset in the northeast corner of the borough, this landscape includes designated ancient woodland and protected lanes. The council wishes to highlight it as an area of particular sensitivity
  
- e) **Public Health:** The council seeks confirmation that full consideration has been given to health implications associated with the proposed route and wider project.

### **Future Engagement and Resolution of Objections**

- 19. The council requests further ongoing engagement with National Grid on the scheme to help resolve its objections.
  
- 20. We thank National Grid for involving the council in this early non-statutory consultation and note the effort that has gone into preparing consultation material and holding public information events. The council looks forward to continued dialogue on the concerns identified in this response.

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