

Brentwood Borough Council response to non-statutory consultation on the Norwich to Tilbury Nationally Significant Infrastructure Project (NSIP), August 2023

Thank you for consulting Brentwood Borough Council as a Host Authority on the Norwich to Tilbury non-statutory consultation.

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, landscape, conservation, and ecology implications.
- A second joint local authority response has been produced by Essex County Council (ECC) working in collaboration with Basildon Council and Brentwood Borough Council (BBC) with a focus on the need to underground the Norwich to Tilbury route on and around the land allocated for Dunton Hills Garden Village.

Understanding the need for the project

1. The UK Government has made it clear that its net zero carbon emissions by 2050 target is an important milestone in creating a cleaner, greener future. It's recognised that the growth in energy generated from offshore wind is a key part of achieving net zero and the Government's Energy White Paper sets an ambitious target to deliver 50 GW of offshore wind connected to the network by 2030. With around 60 per cent of all offshore wind developments looking to bring their energy onshore along the East Coast, additional infrastructure is required to enable offshore wind generated to be delivered to where it would be used. The new power lines will help in reinforcing and modernising the network to ensure future energy transmission demand is met.
2. Brentwood Borough Council has recently declared a climate emergency (June 2023), adding its voice to the growing number of local authorities who have responded to the global climate crisis and to confirm the Council's commitment to achieving net-zero carbon status by 2030 for its own estate. The Council understands and is accepting of the need to upgrade the existing grid and transport cleaner low-carbon energy from where it is generated to where it's needed by homes and businesses. However, this does not mean that all proposals which assist in reducing carbon emissions are approved at any cost. Each application must be assessed in detail, and the public benefits weighed against any identified harms. If the harms are deemed to outweigh the benefits, then the Council would consider it appropriate to object to proposals.

Principle of the 2023 Preferred Draft Alignment

3. Despite the accepted need for the project and movement to a low carbon future, the Council continues to have serious concerns about the proposal. It is understood that the preferred route and overhead line has been chosen, in principle, due to it being the cheapest solution for National Grid and the taxpayer. However, as such, the preferred alignment does not reflect the full range of planning considerations (as outlined in our below response).
4. The Council continues to believe that the installation of numerous new pylons across the borough is not the right option in terms of environmental impacts and impact on residents, and that alternative options should be given more serious consideration. The Council have previously stated a preference for a coordinated, offshore approach to the delivery of transmission reinforcement, to minimise onshore infrastructure and the associated impact on communities and environment, this position still applies.
5. The Council acknowledges that all possible options will give rise to impacts on the local environment, whether that be marine or land, and will have wider costs and benefits that need to be carefully considered. In the event that the preferred offshore approach cannot be delivered, amendments (as discussed in the below response) must be made to this project to reflect the full range of planning considerations and in so doing, to reduce the adverse impact on the boroughs communities and the environment and realise the potential additional benefits that could accrue from this project.
6. The Council accepts that overgrounding is the starting point for reasons of cost efficiencies, however BBC are of the view National Grid should have considered the case for further undergrounding of the infrastructure to a greater extent than the published consultation documents show. The Council notes that National Grid's Design Development Report (June 2023) fails to assess the potential to underground the section of the route between Chelmsford, Brentwood and Basildon; this is considered unacceptable given the severity of the impact across this sensitive location. NPS EN-5 makes it clear that the Government expects overhead lines to be appropriate in most - but not all - instances, while it recognises that there may be a case for undergrounding at particularly sensitive locations including Areas of Outstanding Natural Beauty (AONBs).
7. Until such concerns are adequately addressed, the Council cannot support the specific proposals put forward by National Grid in respect of Norwich to Tilbury, our position is an in-principal objection to the current proposals.

Appraisal of changes to the route affecting Brentwood Borough

8. It's noted changes have been made following the 2022 non-statutory consultation to National Grid's preferred draft alignment of the Norwich to Tilbury overhead powerline. These changes consist of:

- An alternative corridor further east of Ingatestone diverting from the crossing of the A12 to the east of Stock Lane, continuing south passing to the east of the treatment works, re-joining the preferred corridor north of the crossing of Rayleigh Road; and
- a proposal to restrict the alignment to the eastern edge of the preferred corridor (along the boroughs southeastern border with Basildon Council) with the intention of reducing interaction with the Dunton Hills Garden Village.

The Council's response to these changes is set out below:

Further East of Ingatestone

12. The Council endorses comments made by Place Serves, in that "the alternative corridor further east of Ingatestone is to be welcomed as it conserves the setting of Ingatestone Hall, but the adverse impacts are displaced to the countryside to the east rather than removed."
13. There remains concern that despite this change in the route alignment there is a continued risk of significant adverse heritage, landscape and visual effects. The Council supports the comments made by Place Services, in highlighting the need for serious consideration of re-routing or undergrounding (from TB182-TB198) in this area of particular sensitivity.

Havering's Grove

14. Notable by its absence of any meaningful commentary within National Grid's supporting Design Development Report (June 2023) and referred to (within this document) as a 'pinch point' between Hutton and Billericay; BBC wish to make clear its concern for the potential impact the proposal would have on the residents and setting of this community.
15. Moving the preferred route alignment further to the east of Ingatestone has created a scenario whereby the settlement of Havering's Grove is adversely affected by the proposed routing of the overhead line to its northern, western and southern boundary. The transmission line would in effect surround the village in all but its eastern outlook, visually severing the settlement from Hutton and the wider borough of Brentwood. Given this harmful severing effect, coupled with the proximity of the transmission line to residential properties at this self-confessed 'pinch point', we again wish to highlight the need for serious consideration of re-routing or undergrounding of the route around Havering's Grove.

Dunton Hills Garden Village (DHGV)

16. Please refer to Appendix 1, within this response, for a detailed analysis of the impact of Norwich to Tilbury on the delivery and qualitative standards for Dunton Hills Garden Village. Note, in addition to forming part of the BBC's response the content of Appendix 1 informs the Councils joint response with ECC and Basildon Council, in a shared position on the need to underground the Norwich to Tilbury route on and around land allocated for DHGV.

Planning Considerations

17. 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, landscape, 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). Given minimal changes have been made to National Grid's preferred pylon route, comments provided to the previous non-statutory consultation still apply.
18. **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. However, undergrounding appears to have been ruled out on grounds of cost, but there is little evidence showing that a robust cost benefit analysis and options appraisal has been undertaken.
19. **Heritage Assets:** It's noted the route passes within close proximity to the grounds of Ingatestone Hall (Grade I listed) and 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. It is expected National Grid are seeking detailed advice with the regional team at Historic England Cambridge, the Council formally request to be updated on the development of these discussions.
20. **Landscape:** 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. This 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. It is also noted the proposed route passes close to Writtle Forest Ancient Landscapes, this natural heritage asset in the northeast corner of the borough, includes designated ancient woodland and protected lanes. The Council wishes to highlight it as an area of particular sensitivity.
21. **Environmental Health:** The Council seeks confirmation that full consideration has been given to health implications associated with the proposed route and wider project.

22. **Pylon Design:** It is noted that further assessments are due to be carried out on pylon design and no decision has been made on their design. In due course the Council will require detailed landscape visual impacts for all proposed pylon locations to be produced and consulted upon.
23. **Compound Sites:** The consultation material does not provide information on when the associated impacts, such as location for materials compounds, haul routes and staff facilities will factor into the preferred route alignment. Whilst the construction activities would be temporary, they have potential to generate significant impacts in some locations which could be avoided by reviewing the routing at an early stage. It is the Council's view that it would not be acceptable to fix the positions of pylons without reviewing all the implications of their routing.
24. **Mitigation Measures:** Given the nature of the scheme it will be unavoidable for the development to result in residual impacts on the community and locality, including on amenity, loss/reduced quality of recreational opportunity for the community, culture and heritage, and health and wellbeing. BBC expects appropriate and robust mitigation and/or compensatory offsetting for such residual impacts. The Council seeks reassurance that appropriate compensation will be provided where harmful effects cannot be fully mitigated, together with clarification as to what these compensation measures will be. It is requested this information be made clear to all residents and businesses affected.
25. **Community Benefits:** It remains unclear what the benefits of the route are for local communities, given the risk of visual blight the overhead pylons and cabling will have. Whilst it is accepted that the route will help to deliver energy security, boosting the proportion of energy from renewable sources into the UK's energy mix. However, questions remain at the local level as to how many full-time jobs will the project create? How many apprenticeships? How much cheaper will it make household bills? The Council request National Grid clearly sets out to affected residents and businesses what the local level benefits of the scheme are.

Future Engagement and Resolution of Objections

26. The Council requests continued further ongoing engagement with National Grid on the scheme to help resolve its objections.
27. Moving forward the Council would also expect National Grid to have a detailed consultation and engagement strategy with Parish Councils and local residents and businesses in affected areas and ensure that all those who wish to participate have access to the right information, through a variety of consultation processes.
28. We thank National Grid for involving the council in this second 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.

Appendix 1

The impact of Norwich to Tilbury on the delivery and qualitative standards for Dunton Hills Garden Village

August 2023

Background

1. In order to understand the impact of the proposed routing of the Norwich to Tilbury overhead transmission line will have on Dunton Hills Garden Village (DHGV), its first essential to understand the origins and principles underpinning this strategic allocation.
2. In January 2017, DHGV was designated by Government as one of 17 new garden communities. The announcement followed Brentwood Borough Council's expression of interest in response to the Locally-Led Garden Villages, Towns and Cities opportunity, led by Homes England. A total of 51 bids were submitted to Government from across the country, with Dunton Hills being one of only 14 garden village schemes selected, with an additional three garden towns. Through this, Brentwood Borough Council has been granted just over one million pounds over four rounds of capacity funding from the Homes England garden communities programme. And on top of that, in the past two years Essex County Council has been granted several hundreds of thousands of pounds to support garden community projects in Essex, including Dunton Hills. These grants have been vital to help the Council fund a dedicated project team and key pieces of work that have informed collaborative efforts to deliver the garden village.
3. DHGV has been progressing consistently through planning stages (compared to several other proposed garden communities across the country that have been delayed or abandoned) and it is currently one of four large garden communities in Essex. Current progress is a live planning application for the majority of the garden village, that will be heard by Brentwood Borough Council's Planning Committee by the end of this year.
4. 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. DHGV is the largest single development site in Brentwood Borough. The allocation site is forecast to deliver 1,650 homes within the plan period up to 2033, and around a total of 4,000 homes over the life of the site. The development will deliver a new self-contained community with accompanying employment, local services & facilities, community infrastructure and will be characterised by connected green spaces. It plays a pivotal role in allowing Brentwood Borough and the wider South Essex housing market area, an area of acute housing need, to meet a significant part of its key housing and infrastructure needs over the next 10 years and beyond.

5. The Local Plan requires that DHGV adheres to the principles of garden communities and that these principles should be an indivisible and interlocking framework for delivery. It refers to two key publications which highlight the principles and qualities of garden communities:
 - the TCPA Garden Villages Guidance (TCPA) (2017); and
 - the Government's Garden Communities Prospectus (MHCLG) (2018).
6. While the principles listed in these two publications differ slightly, their intention is the same. Garden Communities are 'holistically planned new settlements that enhance the natural environment and offer high quality affordable housing and locally accessible work in beautiful, healthy and sociable communities' (TCPA, 2017). The MHCLG Prospectus further states that there are clear expectations to ensure these new developments achieve and maintain the necessary quality so that they become 'vibrant, mixed-use, communities where people can live, work and play for generations to come – communities which view themselves as the conservation areas of the future'.
7. As set out within the Brentwood Local Plan, the vision for Dunton Hills is summarised as three overarching strategic aims, each supported by a number of sub-objectives. These form the fundamental development principles of garden communities, to help shape and inform the sites development.
8. The DHGV SPD was adopted by the Council in February 2023, this SPD builds further upon the Local Plan policies, setting out detailed design principles which are bespoke to the proposed garden village. The SPD reflects input gathered from a rigorous co-design process, informed by contributions from numerous stakeholders. It provides detailed guidance that ensures local needs are met and garden community principles and qualities are delivered.

Impact

9. It's noted a change has been made to National Grid's preferred draft alignment of the Norwich to Tilbury overhead power line in the area impacting DHGV. As stated within National Grid's Design Development Report (June 2023), the 2023 consultation proposals "route the draft alignment to the eastern edge of the preferred corridor to reduce interaction with the Dunton Hills Garden Village proposal". This report goes on to conclude that "On balance it is considered that a carefully routed alignment to the eastern edge of the consultation corridor is preferred. The majority of the Dunton Hills Garden Village proposals (based on an indicative layout provided in feedback) are set back by around 80m from an existing high pressure gas pipeline, which itself is some distance from the eastern edge of the consultation corridor. It is considered that there is sufficient space to allow for an alignment that is consistent with the Holford Rules and the relevant policy framework without reducing the available development area."

10. Such a simplified analysis fails to demonstrate National Grid's understanding of the sensitivities, complexities and principles underpinning this strategically important garden village allocation.
11. National Grid's preferred route of the transmission line has the potential to seriously undermine the delivery of the allocation and its legacy as a garden community. It's not simply the potential reduction of the available development area that is of concern, although this is one aspect (that cannot be fully quantified at this stage), it is the potential for the routing of the proposed overhead transmission line to impede upon the ability of DHGV to align with the garden community principles upon which it was allocated. The same principles that shape and inform Local Plan Policy R01 and the DHGV SPD, which set out how the allocation must come forward. Put simply, avoiding the available development area would not meet the full policy requirement. "available development area" seems to suggest building footprints because the powerline would encroach into the DHGV allocation site and its adjacent setting area, which are all subject of policy.
12. Set out below is an overview of how National Grid's preferred routing has the potential to undermine fundamental and established strategic objectives at DHGV. The below strategic objectives are taken directly from the Brentwood Local Plan, with additional commentary outlining the perceived impacts:

DH01b: Landscape-led - *Development that takes a natural landscape-led approach to urban design, to deliver a healthy, walkable and climatically adapted public realm and multi-functional green and blue infrastructure, amongst the backdrop views of the Essex countryside.*

This strategic objective responds to the garden community principles that promote 'generous, accessible green space', 'development that enhances the natural environment', 'comprehensive green infrastructure network' and 'deliver environmental gains and enhancements to natural capital'.

This landscape led approach to the design of the garden village seeks to ensure environmental impacts will be avoided and mitigated to allow the development to blend naturally into its surroundings. The design of the garden village will be adversely affected by virtue of the overhead transmission line proposals, with a detrimental effect on outlook from any properties and open space towards what will be large pylons.

The existing landscape setting of Dunton Hills provides a unique backdrop to ensure green infrastructure (as well as the harmonious horizon views afforded by the topography of the site) is the starting point for the design response. Any degradation to the setting of the garden village risks undermining the design and build with nature approach sought within local policy, jeopardizing the quality and legacy of this future community.

It's not simply the physical impact of the overhead power line, but its potential to limit usable open space within its easement strip, which is of concern. Central to the garden village is its network of multifunctional open space, providing opportunities for sport, physical activity and numerous wider benefits. The overhead line will place a limit on the versatility of this space, further eroding this strategic objective.

DH01c: Embedding Heritage Assets - *Development that takes every opportunity to embed the natural and built heritage assets of the site.*

This strategic objective responds to the need for garden communities to place an emphasis on ensuring these 'communities... view themselves as the conservation areas of the future'. The Garden Village Prospectus also emphasises that development 'should include consideration for how the natural and historic environment of the local area is reflected and respected' to build a 'strong local vision'.

To this end, Brentwood Council has worked closely with Historic England over the course of the emergence and the recent adoption of the Brentwood Local Plan (see the Council's [SoCG](#) with Historic England), which ran concurrently with the DHGV masterplanning and co-design process and in the subsequent development of the DHGV SPD; with the aim of overcoming concerns from Historic England in relation to the potential of the development to harm the significance of a number of designated heritage assets.

Collaborative feedback from Historic England has directly influenced the DHGV Framework Masterplan and SPD, establishing key visual links across the site which new development must respect. Ensuring the natural heritage of the landscape (including views) are interconnected with the heritage of the listed buildings within and around the allocation site.

The routing of the overhead transmission line, as proposed, will profoundly impede upon these intentional view corridors which are specified in the SPD, from the Church of St Mary to the historic Farmstead and onwards to the Church of All Saints. This would represent a fundamental erosion of this strategic objective.

DH01g: Homes that provide desirable design, choice and are affordable - *Development that delivers homes that people will be proud to live in, that are universal, adaptable and sustainable in design using quality, durable materials; and homes which are affordable and provide a range of choices in terms of size and tenure, to encourage a mixed and balanced community to establish and flourish.*

This strategic objective responds to the garden community principles which state the need to provide 'mixed tenure homes' and 'housing types that are genuinely affordable'. DHGV represents the creation of a new community which, to function as such, must provide a range of choice (dwelling size, type

and tenure) to allow for the creation of a balanced community from all stages of life to form.

Delivering great, affordable homes will be key to achieving this objective. However, there is a very real danger the financial viability of the allocation will be adversely affected by virtue of the proposed overhead powerline proposal. With the potential to significantly diminish the quantum and quality of affordable housing that can be achieved.

Brentwood Borough is an area in acute affordable housing need. The affordability ratio for Brentwood Borough is 13.2, meaning the median house price in the borough in 2022 is 13.2 times median gross annual workplace-based earnings (this ranks the 6th highest in the East of England).

Historically affordable housing supply in Brentwood Borough has been severely constrained by the Borough's Green Belt location, restricted supply of development land and lack of development finance and public subsidy. However, with the adoption of the Local Plan, the delivery of affordable housing on site allocations is projected to increase substantially. To achieve this, site allocations must deliver policy compliant levels of affordable housing. Given its scale, nowhere is this more important than at DHGV strategic allocation.

13. Potential for financial viability of the allocation to be adversely affected as a consequence of the proposed overhead powerline proposal, not only creates risk for achieving the required quantum of affordable housing, but also for the ability of the garden village to secure the required infrastructure contributions as specified in the Council's Infrastructure Delivery Plan. These are requirements that make the development of Dunton Hills acceptable in planning terms and are fundamental to the delivery of the scheme.
14. When consideration is given to the cumulative effects, outlined above, the totality of the affect the routing of the overhead transmission line will have on the delivery and quantitative standards of DHGV becomes apparent. Calling into question the ability of the strategic allocation to be delivered in accordance with the Local Plan policies upon which it was allocated and the garden community principles upon which it is has been conceived.
15. It's important to note, that DHGV allocation site's redevelopment is predicated on the undergrounding of the existing 132kV + 11kV overhead lines that run across the site. This undergrounding is 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.
16. It's noted National Grid's Design Development Report (June 2023), in its consideration to the avoidance of DHGV, makes no assessment into the potential for undergrounding for this section of the route; this is considered unacceptable given the severity of the impact the overhead transmission line will have on the

ability of DHGV to be delivered in accordance with adopted Local Plan policies. The Council wishes to highlight the need for transparency regarding what consideration of undergrounding on this section of the route has been undertaken to date, what, if any, specific financial modelling has National Grid done on the cost of undergrounding? What does National Grid estimate will be the total costs of settling claims for damages - including legal expenses? And, apart from meeting obligations to the taxpayer, what are the specific planning reasons for National Grid ruling out undergrounding of the Basildon/Brentwood stretch of the route? Has a robust cost benefit analysis and options appraisal setting out the above been undertaken to date, and if not on what grounds can this be justified?

17. Finally, its noted consideration of direct and indirect effects the Norwich to Tilbury project will have on the socio-economic, historic environment, landscape and visual conditions in and around DHGV are in the process of being assessed within the Environmental Impact Assessment (EIA). These considerations have direct links to garden village principles outlined in this response, as such BBC have been engaged with National Grid in feeding information into the EIA process; however, the EIA is still, at this stage outstanding. BBC wishes to stress the continued need to assess the likely significant impacts on DHGV that need to be identified as part of the EIA process.

END