

Joint local authority position in relation to Dunton Hills Garden Village and the need to underground the Norwich to Tilbury route on and around land allocated for Dunton Hills Garden Village

Dunton Hills Garden Village – the need for the consideration of alternatives, including the undergrounding of the route

ECC acknowledges further consideration of its objection to the 2022 preferred route on land allocated in Policy R01: Dunton Hills Garden Village Strategic Allocation of adopted Brentwood Local Plan (2022). The grounds for objection were made as part of the first round of non-statutory consultation in June 2022 and related to the visual impact of the 2022 preferred route and its likely adverse effects on housing delivery in Brentwood and Basildon, and the financial viability and general amenity of Dunton Hills Garden Village (DHGV). ECC welcomes the recent opportunity to discuss these issues further in regular meetings with NGET and joint local authority partners Basildon Borough Council and Brentwood Borough Council.

Unfortunately, the 2023 preferred route does not contain sufficient mitigation for ECC to withdraw its objection. ECC consider that, should there be no reasonable alternative to the 2023 preferred route whereby the land allocated for DHGV is avoided altogether, sufficient mitigation would require the use of underground cabling. ECC consider that this position is supported by the Holford Rules guidelines cited in paragraph 2.8.6 of the adopted National Policy Statement for Electricity Networks Infrastructure (2011) and paragraphs 2.11.10 and 2.11.14 of the draft National Policy Statement for Electricity Networks Infrastructure (2021), which includes consideration of undergrounding outside of nationally designated landscapes

ECC has summarised its argument below but would defer to joint local authority partners who have provided further details in appendices [xxx] on national and local planning policy as it relates to DHGV and wider issues around viability and housing delivery in the South East Housing Market Area.

ECC notes the proposed change to the 2022 preferred route described in paragraph 3.2.12 on page 21 of the Design Development Report (June 2023) as:

“...proposal to restrict the graduated swathe and alignment to the eastern edge of the preferred corridor to reduce interaction with the Dunton Hills Garden Village development...”

Further, the consideration of alternative route alignments between Hutton and West Horndon detailed in paragraphs 5.5.142 – 5.5.145 on pages 62-63 of the same report. The Design Development Report concludes in paragraph 5.5.145 on page 63:

“The majority of the Dunton Hills Garden Village proposals...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”.

ECC does not support this conclusion and is concerned that the justification for the 2023 preferred route is too narrowly framed around the proximity to an existing high-pressure gas pipeline. The Design Development Report makes no reference to any consideration having been given to Brentwood Local Plan policy R01 or the associated Dunton Hills Garden Village Supplementary Planning Document, which describes in detail the extensive work that has been undertaken at the national and local level to plan, design and develop a viable garden village.

The same report is also silent on the strategic importance of DHGV for housing delivery in Brentwood, Basildon and the south-east, given that the wider evidence base does not refer to the various housing market areas in place across the route. This is further compounded by the absence of any reference to the significant affordable housing need in both the Brentwood and Basildon boroughs, which is exacerbated by the vast areas of green belt land designation, the lack of development finance and public subsidy, as well as both boroughs' proximity to, and links with Greater London.

ECC would have expected the 2023 preferred route to have been informed by the relevant local development plans for both boroughs and specifically in relation to Basildon, the absence of an up-to-date Local Plan and five-year housing land supply. ECC considers that the 2023 preferred route would materially undermine the local plan-making processes in both Brentwood and Basildon to the significant harm of local people needing to access affordable, high-quality housing.

ECC would argue that from the outset the 2022 preferred route was contrary to Holford Rule 7, which 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.” Holford Rule 7 further states 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.

The 2022 preferred route was engineering led and appeared not to benefit from robust consideration (if any) being given to the heritage impact, visual impact and effects to amenity on DHGV. It follows that mitigation was not proposed. ECC accepts that the 2023 preferred route is intended to “...reduce interaction with Dunton Hills...” but it is not clear how this change addresses compliance with the Holford Rule 7, or the general presumption in the Holford Rules against routing overhead lines close to residential areas. Given that DHGV is an allocated site in an adopted local plan, supported by a supplementary planning document and has had a live planning application to develop the site since 2021, ECC consider that this general presumption should be applied purposively to include DHGV as a residential area.