



Adequacy of Consultation Representation Proforma

Under *Section 55(4)(b) of the Planning Act 2008* (PA2008) the Planning Inspectorate, on behalf of the Secretary of State, must take any adequacy of consultation representation (AoCR) received from a local authority consultee into account when deciding whether to accept an application for development consent, and this will be published should the application be accepted for examination.

An AoCR is defined in s55(5) in PA2008 as “a representation about whether the applicant complied, in relation to that proposed application, with the applicant’s duties under sections 42, 47 and 48”.

Project name	Norwich to Tilbury Project
Date of request	01 September 2025
Deadline for AOCR	15 September 2025
Return to	NorwichToTilbury@planninginspectorate.gov.uk

Please complete the proforma outlining your AoCR on the above NSIP.

Local Authority	Chelmsford City Council
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In the opinion of the local authority, has the applicant complied with the legislative requirements listed below?

Please note that this is specifically about the statutory consultation(s) undertaken.

Assessment of Compliance - Required	
S42 Duty to consult	Yes / No
S47 Duty to consult local authority	Yes / No
S48 Duty to publicise	Yes / No

If you would like to give more detail on any of the above, please do so below.

Please keep it as succinct as possible and refer to facts and evidence related to consultation, rather than the merits of the application.



Additional comments - <i>Not compulsory</i>	
S42 Duty to consult	To the best of Chelmsford City Council's knowledge, National Grid Electricity Transmission (NGET) have complied with their duty to consult those parties under this section of the Planning Act 2008.
S47 Duty to consult local authority	<p>National Grid Electricity Transmission (NGET) sent Chelmsford City Council (CCC) a draft Statement of Community Consultation (SoCC) on 1st December 2023 and we responded on 5th January 2024. The SoCC was published for consultation in March 2024 and CCC sent a formal response on 2nd April 2024. A further draft SoCC in respect of the Targeted Consultation was issued on 4th December 2024 and CCC submitted comments to this on 18th December 2024.</p> <p>CCC can confirm that the Statutory and Targeted Consultation were held within the prescribed dates. To the best of CCC's knowledge, CCC is satisfied that NGET has complied with the duties set out in Section 47 of the Planning Act 2008.</p>
S48 Duty to publicise	<p>Chelmsford City Council (CCC) notes that some of the original notices contained errors, and these were corrected by NGET.</p> <p>To the best of CCC's knowledge, CCC is satisfied that NGET has complied with their duty to publicise under this section of the Planning Act 2008.</p>



Any other comments

Thank you for your letter dated 1st September 2025 asking Chelmsford City Council (CCC) for representations on the Adequacy of Consultation for the Norwich to Tilbury pylon proposal.

Our comments are centred around the pre-application stage of the Development Consent Order (DCO) process and give CCC's opinion as to whether National Grid Electricity Transmission (NGET) has complied with the following duties under the Planning Act 2008:

- Section 42 – Duty to consult
- Section 47 – Duty to consult the local community
- Section 48 – Duty to publicise

In producing this response CCC has considered the Consultation Report and Appendices submitted by NGET in support of the application dated 29th August 2025.

CCC's view is that NGET has carried out adequate pre-application consultation on the DCO application in line with Sections 42, 47 and 48 of the Planning Act 2008.

Notwithstanding this, CCC has concerns with several aspects of the consultation which are set out below.

Significant Non-Statutory and Statutory engagement between NGET and CCC has taken place on the proposal over the past years and CCC appreciate the information that has been shared. Whilst we recognise that information has been shared voluntarily, it is only since the submission of the DCO application that CCC has had sight of the feedback to the Statutory and Targeted Consultation.

This lack of feedback during the pre-application process has made it very difficult for CCC to understand how NGET has considered and responded to feedback from CCC, stakeholders and other interested parties.

This is especially so within Great Waltham and Little Waltham, where CCC understands that the submission proposal includes further alterations to the height and location of the proposed pylons. In the interests of transparency, CCC would have wished for these changes to have been communicated clearly to CCC, stakeholders and other interested parties prior to submission of the DCO application.

CCC notes that the Consultation Report is heavily reliant on conclusions reached within the Environmental Statement (ES). It is noted that the key evidence base of the ES was not shared with CCC prior to submission of the DCO application, despite CCC and other stakeholders repeatedly and consistently requesting information and amendments.



This lack of information has made it difficult for CCC to reach an informed position on various aspects of the proposal. This has affected our ability to contribute fully to documents such as the Statement of Common Ground.

Neither has CCC seen a fully drafted version of the draft Development Consent Order (DCO). In order to progress discussions relating to the terms and content of the DCO; particularly with regard to the timescales for discharging the requirements, it would have been helpful if this information had been shared with CCC at pre-application stage.

CCC is aware of concerns that have been raised by objectors regarding the Gunning principles and their relevance to the adequacy of consultation conducted by NGET on Norwich to Tilbury.

CCC acknowledges that the Gunning principles apply to the consultation carried out by NGET on the scheme and CCC has had regard to them in its assessment of adequacy of consultation.

We trust NGET will engage with stakeholders including CCC over the coming months prior to the conclusion of the DCO examination and welcome further engagement with them.