

# Colchester City Council's (CCC) Written Representation.

## Application for a DCO - Norwich to Tilbury

1. CCC has set out its response to the impact of the scheme and the applicants Environmental Statement (ES) in its Local Impact Report (LIR), but would like to take this opportunity to provide a short written representation noting some key themes of concern. It is not exhaustive but is hopefully useful to the ExA. No summary of this is provided as it is intentionally less than 1500 words.
2. Whilst CCC consider the consultation legally compliant in line with the Act, it is clear from the representations and open floor hearing submissions that it was not well received and many IP's consider the route to be predetermined. The then Energy Systems Operator's (ESO's) report of 2024 set out numerous options for energy transmission in East Anglia and shows a very useful example of what the non-statutory consultation could have looked like – a set of clearly different options, with wholly distinct routes and transmission methods and substation locations. CCC consider that if the applicant had taken a similar approach, **this would have given the public a genuine set of clearly different, costed options to comment on.** If the ESO can produce such a study, why could the applicant not have done the same non-statutory consultation stage?
3. The position of the East Anglian Connection Node (EACN) substation at Ardleigh was predetermined. It is this location that then dictates the route of the alignment, and the corresponding order limits. It is the location of the EACN that produces a route that in turn causes significant harm to the Dedham Vale National Landscape (NL). **This does not comply with NPS EN5** which requires harm to NLs to be avoided in the first instance.

4. The Council supports the need for an **additional Issue Specific Hearing for 'alternatives'** to allow those IP's to ask their reasonable questions on the matter. It is clear from the Open Floor Hearings that IP's and their representatives/advocates want to discuss this matter in detail and a 'high level' issue specific hearing (ISH) where the applicant responds to the ExA whilst very useful may not give IP's a chance to ask the specific questions they have.
  
5. The ES has assigned a sensitivity of 'low' to non-designated heritage assets and has not assessed the impacts of the project on their setting. This approach in the interests of efficiency has therefore undersold the harm to built heritage that the scheme causes. The ES noted the harm to built heritage in terms of designated assets to be in the middle of the spectrum of less than substantial harm. It is noted that this harm occurs to assets of all grades, including Grade I and Grade II\*. This residual harm is avoidable as it **would be significantly reduced with more undergrounding**.
  
6. The ES has noted the significant harm to the landscape. The applicant does not shy away from the fact the scheme will **cause significant residual harm**. As set out in the LIR, the Council consider **the harm to be even more significant than** the applicant, however. Whilst the applicants argue that a scheme of this length and scale necessitated proportionality, CCC would have like to have seen a much more extensive approach to the viewpoints selected, noting that the ZTV shows potential visibility from far greater distances than the majority of the VPs illustrate. This is particularly pertinent in the Dedham Vale NL and in the Colne Valley villages near to Aldham, Fordham and Fordstreet. The embedded mitigation is not sufficient due to the scale of the works proposed – it is simply not possible to mitigate the impact of a line of numerous 50m+ latticework towers. No compensation has been provided. The scheme involves a **significant amount of tree loss**. This must be mitigated.
  
7. The scheme will **permanently and irreparably harm the outlook** of many of the residents close to the OHL section, reducing the enjoyment of their dwellings and their local areas and therefore demonstrably impacting their wellbeing and quality of life. The rural landscape is the reason many live in this area. This is particularly pertinent in terms of the villages that are close to OHL, for example Langham, Boxted, Great Horkesley, West Bergholt, Eight Ash Green, Aldham, Fordham, Fordstreet, Great and Little Tey and Marks Tey, plus the isolated dwellings between those.

8. The scheme will have a **harmful impact on tourism, rural business and farming** in the CCC area. The rural isolation is a key reason to visit the area, to walk the footpaths include the Essex Way and to enjoy the visual and cultural wonder that is the Dedham Vale NL. The proposal will materially damage this tourist and business offer. Much of the CCC area is rural hinterland and it is this section of the area that is most impacted by the scheme. The construction phase will seriously limit access to farms, business and the areas tourist offer, including the Public Right of Way network.
  
9. The **Council struggle to rationalise the argument for the siting of pylons over the undergrounded section between the EACN and Boxted**. The applicant states that it is not technically feasible to underground into the EACN (through the Dedham Vale NL) and then back out again (towards the Boxted CSE Compound), but this approach doubles the level of harm in this area. This is because the land will be destroyed in the undergrounding construction phase and then will still suffer the addition of pylons over the top of it.
  
10. The Council considered that throughout the applicant's submission there is a great deal of work – for example species specific ecological surveys and archaeological investigation such as trial trenching, that has not yet occurred. For a scheme of this scale the Council consider this leaves a **significant risk of problems arising at a later date**, resulting in the need for post issue of DCO changes or complexity in the discharge of the requirements.
  
11. With regards to the wording of the DCO requirements, the Council consider the turnaround time for discharge by LPAs such as CCC **to be far too short** when considering the number of requirements and sheer level of information that the draft requirements deal with.
  
12. **The working hours suggested in the draft DCO are wholly unacceptable** and do not give the residents of the area reasonable respite from the noise and disturbance of not only the extensive construction phase, but many HGV movements associated with it. **Sundays and Bank Holidays in particular must be left free of all construction activities.**

ENDS