

Essex County Council
Cabinet Office
PO Box 11, County Hall
Chelmsford
Essex CM1 1LX



Date: 26 February 2026
Our ref: N2T/Deadline1/Cllr Scott

Dear Ms Hunt,

Application by National Grid Electricity Transmission (NGET) for a Development Consent Order (DCO) for the proposed Norwich to Tilbury Project (Application Reference: EN020027)

**Norwich to Tilbury Project - Deadline 1 Response
Written Representation from Cllr Scott, Essex County Council (ECC)**

Thank you for the opportunity to provide this summary of the oral submission I would have made had I been able to attend the Open Floor Hearing on Thursday 12th February as Cabinet Member for Housing, Planning and Regeneration for Essex County Council.

Essex County Council, along with other Council's, has always maintained an in-principle objection to the proposals for Norwich to Tilbury being put forward by National Grid.

The Council has continually urged National Grid to more seriously consider the use of alternative technology which could involve utilising the latest technology to deliver innovative solutions to deliver the infrastructure needed to provide additional capacity for the significant offshore energy development happening around the East Anglian coast. This could result in a reduced impact on local communities and the environment arising from the use of predominantly, traditional and some might say dated, overhead line technology.

On behalf of Essex County Council, I would highlight to the ExA, the County Council's overarching and unwavering commitment to deliver sustainable growth for the County that reduces geographical inequalities to economy, the environment and the health and wellbeing of communities across Essex. This approach reflects the position set out in the Council's Nationally Significant Infrastructure policy that states we will only support NSIPs that create resilience in Essex and not those that exacerbate existing or create new vulnerabilities.

It is with regret therefore that the Council remains concerned about the current proposals which unless sufficiently and robustly mitigated, will cause unacceptable harm to the current and future wellbeing of the county: a concern that is exacerbated by the cumulative impacts of this project, other NSIP's and other committed strategic growth developments happening across the County.

Support for Clean Energy

The fact there is a need to invest to improve the nation's energy infrastructure is fully acknowledged. Enhanced transmission infrastructure is needed across the country and within Essex, to tackle the

needs of sustainable growth and climate change if the Government targets in the lead up to net-zero by 2050, are to be met.

For Norwich to Tilbury, this context is acknowledged as is the need to provide additional capacity in the transmission network to accommodate the expected growth in demand for electricity from the current and planned offshore windfarms in the East Anglia region.

The Council wants to make it clear that it not against proposals to improve energy infrastructure and is supportive of the national transition towards a low or zero carbon economy - especially given its own achievements in promoting sustainable growth and low carbon developments. However, it is considered that the shift towards the delivery of low carbon energy nationally will only be successfully achieved if developments such as Norwich to Tilbury can be brought forward after taking into account and suitably mitigating, the very real impacts they have on the natural environment, landscapes, and local communities within which they are situated.

Such national benefit must not be secured at the expense of local host communities, landscapes and environments that would be affected by such development.

Preferred Strategic Alternative

As already stated, from the outset of its engagement on this project and through all stages of consultation with National Grid, the Council has maintained a position that its preferred strategic option for meeting the need for additional transmission capacity is that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length.

A more sensitively designed scheme incorporating off shore or underground cables, or using different pylon design in sensitive locations, could deliver a better outcome for Essex safeguarding the amenities of local communities and the environment. It is disappointing however, that despite this long and strongly held position, there has been a lack of movement or genuine feedback from National Grid on the proposed route in response to these concerns. Furthermore, there has not been any desire to fully investigate the use of new techniques such as cable ploughing which could be used to minimise disruptions associated with the installation of underground cables.

The concern informing its preferred option and reflected in the comments of many residents you will have already heard from, is founded on the significant impact a scheme based on the transmission of energy via overhead power cables will have on affected communities, the environment, and the economy of Essex.

Harm

Over 50% of the proposed route lies within the County meaning there will be at least two hundred 50 metre high pylons located in the Essex landscape. This will result in the introduction of a significant number of incongruous and intrusive features, of industrial character, into a predominantly open rural landscape. Due to the height and scale of the structures involved, it is difficult to successfully mitigate their presence; the effects of which would be permanent for the lifetime of the scheme. This means there will be residual harm to communities, our landscape and wildlife that cannot be undone.

Fundamental to the character of the County which our residents experience on a daily basis, is our landscape and heritage. Officers continue to engage with National Grid to ensure these important assets are either not harmed as a result of the project or where that harm to the appearance or setting of these assets is unavoidable, there is suitable protection through the relevant management plans and robust mitigation.

Flooding is also of concern to the daily lives of residents and business's. In the context of Norwich to Tilbury this means managing any risk of water from man-made structures and drainage systems, small watercourses and rainfall off the land which could lead to surface water runoff from temporary haul roads and compounds leading to flooding affecting residential and business land.

The Council has therefore requested further clarity on the location of permanent and temporary construction works especially given the limits of deviation, to ensure all works incorporate appropriate flood mitigation and surface runoff management. It is also important for communities and the environment that National Grid confirm that all temporary haul roads and compounds unless otherwise agreed, will be removed at the end of the construction period and the land reinstated to its original condition.

Ardleigh / Cumulative

While the routing of the overhead lines will have an impact along its entire length, certain locations will be more greatly affected. As you will have heard at the Open Floor Hearing for Essex on Thursday 12th February, there is significant concern regarding the visual impact of pylons on the landscape and heritage assets which are routed between The Waltham's.

Additionally, both in isolation and cumulatively, there is significant concern regarding the impact of Norwich to Tilbury on the amenities and environment of Ardleigh. This is accentuated by the substantial presence of the proposed East Anglian Connection Node and the further substantial and invasive development associated with the Five Estuaries and North Falls offshore windfarm and Tarchon Interconnector. These developments will all have substation infrastructure concentrated around the proposed East Anglian Connection Node to the east of Ardleigh. The concentration of energy infrastructure in this location is also felt to be a potential security concern as the supply of electricity would be susceptible to disruption from a local event affecting the operation of the facilities in this locality.

A request for greater consideration through the Examination of the the cumulative impact and inter relationship between the projects, would be welcomed, and an Issue Specific Hearing on the matter would be supported.

LoD

Furthermore, as has been mentioned in the Open Floor Hearing, the proposed limits of deviation are causing considerable distress due to the lack of certainty offered by National Grid. The limits of deviation as currently set out are so broad that residents and communities face uncertainty around what the final scheme will mean for them.

DHGV

The Council is also concerned about the impact of the proposed overhead line on the development proposed at Dunton Hills Garden Village and planned for the wider area through the emerging local plans of Brentwood Borough Council and Basildon District Council, and the lack of consideration offered by National Grid on this strategic development.

The proposed Norwich to Tilbury route runs along the eastern edge of the allocated site and cuts through this new settlement. It clearly does not adhere to Holford Rule 7. Furthermore, and exacerbated by the elevated nature of the site relative to the route, the proposed overhead powerlines and pylons offer no potential to enhance the quality of the landscape or the amenity of DHGV: a designated garden village. The Council therefore maintains the proposed overhead powerlines along this section of the route rather than using underground cables or a different pylon design, will degrade the design principles of the Garden Village. It is also felt the presence of the overhead lines would likely to lead to a reduction in current and future land value and property

prices, which will be to the detriment of the long-term viability of the development and deliverability of necessary affordable housing and infrastructure.

As a result, it is considered the proposed alignment is contrary to the principles of good design as advocated by the Holford Rules, and impact mitigation for energy infrastructure as required by NPS EN-1 and NPS EN-5. Furthermore, it also considered the proposals are contrary to garden community principles of Policy R01: Dunton Hills Strategic Allocation of the adopted Brentwood Local Plan 2016 – 2033 and that the 2024 preferred draft alignment materially undermines the local plan-making process in Basildon, Brentwood, and Thurrock to the detriment of housing and infrastructure delivery.

Highway / Traffic Generation

There are significant concerns around the impacts on the operation of the county's highway network from the construction of Norwich to Tilbury alongside the cumulative impact of other developments.

Five other NSIPs are expected to be active and coincide with the Norwich to Tilbury scheme for a period of three years between 2027 and 2030. This would include North Falls Offshore, Five Estuaries Offshore, Bramford to Twinstead and Longfield Solar Farm. Of these, North Falls and Five Estuaries alongside Norwich to Tilbury have focussed impacts on the Parishes of Ardleigh, Great Bromley, Little Bromley, and Little Bentley. Furthermore, the proposed Tarchon Interconnector is another NSIP which is planning to land in the Tendring Peninsula and although likely to start at the latter end of Norwich to Tilbury project, will have significant interventions in the Ardleigh area around the proposed EACN (although specific site locations are not yet defined).

It must be recognised the Council has limited control over the timing of the various projects which will result in the potential for both localised impacts (where multiple sites are implemented in close proximity) and further afield across Essex (where multiple sites use similar construction routes). This creates a significant potential for the function of the network to seriously impact residents and the operation of existing local businesses, critical to the continuing growth of the County. This issue is explored in more detail in the Council's local impact report, especially in terms of National Grid committing to the use of the Council's highway permit scheme to manage the impact of diversions and any road closures. It is therefore important for National Grid to respond positively to the ongoing discussions regarding this and the need for appropriate mitigation at key junctions. ECC would also strongly advocate for National Grid to commit to proposals for a Developers Forum where the impacts can be understood, and where possible mitigated and coordinated across these various developments. It is also important that the need to support the economy of the County during this period is recognised and appropriate measures put in place to mitigate or offset the effects where they cannot be mitigated.

Any diversions would need to be agreed well in advance with our Permit Team, and we should have the power of veto on any we don't consider to be correct and in conjunction with others including our own and that of utilities.

There is also concern over the impact of the proposal both in isolation and cumulatively, on the maintenance of the County's highway network. As set out in our Local Impact Report, it will be important that National Grid are required to mitigate the effects on the condition of the highway and address the damage caused from increased wear and tear especially on many of the rural roads which will not before have experienced this level of vehicle movements particularly HGV movements. This will need to be addressed and secured as part of the DCO, and the Council is keen to work proactively with National Grid to resolve these issues so that host communities do not have to meet the cost of repairs. The Council will also require assurance that the structural integrity of highway structures including bridges is reassessed prior to their use given the time that could elapse between when the studies were undertaken and commencement of the project, to ensure

they are suitable for use by construction traffic and that this is agreed with the Highway Authority. prior to construction routes being used.

In addition, the Council is looking to discuss with National Grid about agreeing to a mechanism for reclaiming costs in respect of emergency callouts relating to either damage that has occurred in the highway as a result of the construction (within the vicinity of the site accesses) or Traffic Management issues associated with the scheme.

More Time for Alternate Options

Based on the available information provided by National Grid in their submission, the offshore High Voltage Direct Current (HVDC) cable solution would be more expensive than the currently proposed onshore solution with High Voltage Alternate Current overhead lines. However, the High Voltage DC option would be less expensive than an onshore solution with underground High Voltage Alternate Current (HVAC) cables, as set out in 6.3 Environmental Statement Chapter 3 – Alternatives (APP-127).

Where proposed, the use of underground cable is supported as these will have real benefits and reduce the visual impact on sensitive landscapes. But they do not go far enough and I'm conscious of the concerns regarding the visual impact of the remaining sections of overhead line. These will be drawn out further in the Council's Local Impact Report.

It is felt that a more extensive combination of onshore and offshore technologies to mitigate the clear harm that will result from the overhead line should therefore have been considered, beyond the areas of underground cabling currently proposed. This could address the real and significant impacts the overhead lines have on the natural environment, landscapes, and local communities within which they are situated.

Supporting this concern, and as advanced in the Council's Relevant Representation (RR-1083), and again, to be advanced in the Council's Local Impact Report, is that there has been too great a reliance by National Grid on the contracted energy generation position to identify the maximum requirement for additional transmission capacity in East Anglia.

The Hiorns Report (as submitted to the ExA with the Norfolk County Council Relevant Representation (RR-2753)) recognised the contractual obligations highlighted by National Grid but given the uncertainties around many projects, identified that it is extremely unlikely that all of the contracted energy generation projects would come forward and/or connect at the volumes stated or dates contracted.

This is why the Council identified in its Relevant Representation (RR-1083) a need for further analysis to assess the current status and likelihood of all contracted projects proceeding at all, or by the dates assumed.

The importance of this is that the Hiorns Report concluded that there could be more time to consider further analysis of potential options, including a potential offshore HVDC link and alternate route options, without prejudicing the development of offshore projects in the East Anglian region. It could not be concluded that the NGET proposal was the best option.

The response of National Grid to this concern and the Hiorns Report suggested it could not delay its reinforcement of the transmission network beyond 2030 without being in breach of its contractual and licence obligations.

While the Council accepts the contractual and licence obligations may be relevant it maintains its view that the weight to be given to these contractual and license obligations is limited unless validated by a review of the contracted electricity generation.

The Council does not believe that National Grid has provided any new evidence or sensitivity testing to refute the conclusion of the Hiorns report that the Norwich to Tilbury project is not needed by 2030 and as a result, more transparency is required about the status of the contracted connections and the likelihood of those projects being ready to connect to the transmission network by 2030. It is important that National Grid does not restrict the justification for future network expansion solely to the ESO contracted position.

Until this further analysis is provided, the Council maintains its position that credible alternatives such as an offshore-centred approach or HVDC undergrounding, delivered at pace, to minimise onshore infrastructure in Essex should continue to be fully explored so as to minimise the visual intrusion and environmental impact.

Summary Points

In summary, the current application proposes overhead supported on 50m high lattice pylons, with targeted HVAC undergrounding primarily in the Dedham Vale National Landscape within Essex. As such, the scheme as put forward would have very significant impacts as set out in the local impact report. If indeed the timing for the network reinforcement is less acute, as suggested in the Hiorns Report, alternative schemes to the current lattice pylons scheme should be explored in more detail (such as offshore connections and HVDC undergrounding) to ascertain whether they would achieve better environmental outcomes overall, than the current submitted scheme, at acceptable costs, and if so put them forward at pace to achieve the required network reinforcement instead of the submitted scheme.

Legacy Benefits

Notwithstanding these concerns, the Council considers the shift towards the delivery of low carbon energy will only be successfully achieved if developments such as Norwich to Tilbury take into account and mitigate the very real impacts they have on the natural environment, landscapes and local communities within which they are situated, as well as on planned development such as Dunton Hills Garden Village.

If the proposal is therefore to receive favourable consideration, it is important that appropriate levels of mitigation and legacy benefits are secured. The project will deliver significant benefits at the national level, but not at the local level, which is unacceptable. The effects of the development will continue to adversely affect the local economy, environment and health and wellbeing of communities in Essex that cannot be sufficiently mitigated or compensated solely through the planning regime.

Like most nationally significant energy transmission infrastructure projects, it will deliver very little local benefits unless National Grid specifically creates social value at all stages of the project lifecycle.

Essex strongly believes the Norwich to Tilbury project should deliver significant genuine beneficial socio-economic benefits to the host communities. Norwich to Tilbury is one of a number of energy NSIPs located in or neighbouring Essex that are required to provide secure, clean, and affordable energy as part of the transition to net zero.

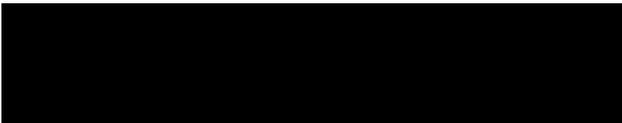
Given the national and local skills shortage in this sector of the economy to deliver these ambitions, the project represents a real opportunity to deliver training, skills, and employment both during construction and operation, alone and cumulatively with other NSIPs. The Project should therefore provide benefits across Essex, with a particular focus on its areas of greatest deprivation. The Council is concerned that this issue and especially the associated social value opportunities around

skills, training, and future employment, have not been fully addressed. National Grid therefore needs to address this significant shortcoming as a matter of priority.

The Council also expects a financial package of community benefits that is separate to social value.

Essex County Council would welcome working in partnership with National Grid to plan and deliver a generous and innovative community benefits package for Norwich to Tilbury. This should include any emerging requirements from the former government's draft community benefits guidance for electricity transmission network infrastructure and explore opportunities to coordinate with other energy NSIPs and major infrastructure projects.

Yours sincerely



Cllr Lee Scott
Cabinet Member for Housing, Planning and Regeneration
Essex County Council