



Brentwood Borough Council Local Impact Report

Norwich to Tilbury 400kV Grid Reinforcement
Application by National Grid Electricity Transmission
(NGET)

PINS Interested Party Number: [REDACTED]
PINS project reference: ENO20027

February 26th, 2026

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1 Introduction

- 1.1 This report comprises the Local Impact Report (LIR) for Brentwood Borough Council (BBC) to the proposed development by National Grid Electricity Transmission (NGET) of the Norwich to Tilbury 400kV Grid Reinforcement, a Nationally Significant Infrastructure Project (NSIP).
- 1.2 As set out in the Planning Act 2008 (as amended), the purpose of an LIR is to provide written details of the likely impact the proposed development (the 'Project') would have on BBC's authority area or on any part of its area. The local knowledge and evidence held by Local Authorities is valuable to the NSIP process and can provide further insight to that provided by the Applicant in the Development Consent Order (DCO) application.
- 1.3 This LIR follows the guidance in PINS Advice Note One (Local Impact Reports April 2012 Version 2). The guidance advises that "Local authorities should cover any topics they consider relevant to the impact of the proposed development on their area". The LIR is therefore proportionate to the scale and nature of development proposed within the borough and to the local impacts anticipated to arise from it.
- 1.4 The majority of the proposed development – spanning approximately 180km – will occur outside of the borough and predominantly to the north, in particular crossing the wider Essex, Norfolk and Suffolk County Council areas, and separate but complementary LIR's will be produced by the other host authorities. This LIR only covers matters relevant to BBC and therefore the report does not seek to comment on matters that do not affect the borough, even if these are planning matters.
- 1.5 The proposal put forward by NGET as Applicant consists of the following:
 - A new 400 kV electricity connection of approximately 180 km in length from Norwich Main Substation to Tilbury substation via Bramford substation
 - A new EACN substation and a new Tilbury north substation.
 - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons, approximately 50 m in height or low height steel lattice pylons (approximately 40 metres in height) with proposed Cable Sealing End (CSE) compounds or existing or proposed substations
 - Approximately 21 km of 400 kV of undergrounding cabling, some of which would be located through the Dedham Vale.
 - Seven new CSE compounds, modification works to connect the existing Norwich substation to the Bramford substation, new 400 kV substations on the Tendring peninsula and to the south of Orsett Gold Course.

- Modifications to the existing NGET overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
 - Ancillary and/or temporary works associated with the construction of the proposal.
 - Third party utilities diversions and/or modifications would be required to facilitate the construction of the Project.
 - Land required for environmental mitigation and Biodiversity Net Gain (BNG)
 - Land required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.
- 1.6 The primary purpose of this LIR is to identify Local Plan policies insofar as they are relevant to the proposed development and the extent to which the development accords with them. It expands upon the issues raised in BBC's Relevant Representations (November 2025) and sets out the key issues and concerns BBC wishes to be considered for examination.
- 1.7 This LIR covers areas where BBC has a statutory function or holds expertise. BBC defers to the relevant authorities including the Local Lead Flood Authority (LLFA), Essex County Council Highways Authority and the Minerals and Waste Authority with regard to their comments in their LIR. Any relevant comments on Ecology, Archaeology, Heritage, Landscape and Visual effects have been prepared in consultation with Essex County Council Place Services (EPS).
- 1.8 This document has been written with the understanding that BBC and National Grid continue to collaborate on the preparation of a Statement of Common Ground (SoCG). Whilst work on this will continue throughout the examination, an initial updated version is scheduled to be agreed and submitted by Deadline 1 on Thursday 26th February 2026. Where issues have been agreed in the SoCG, they are not explored further in this LIR document. Consequently, this LIR and the SoCG should be read in conjunction.
- 1.9 It is recognised that the Examining Authority (ExA) and the Secretary of State (SoS) must have specific regard to the BBC LIR (as well as others received) when making their recommendation and decision, respectively.

2 Site description and surroundings/location

- 2.1 A comprehensive description of the site and surroundings is provided in the Applicant's Environmental Statement. It is noted that the Applicant is using the 'Rochdale Envelope' approach to provide flexibility in the development, with the worst-case scenario for environmental impacts presented and it being understood that any future iterations would therefore be less impactful.
- 2.2 Covering an approximate 180km in length (159km as Overhead Line Pylons (OHL)), the land required for the Project traverses Norfolk County Council, Suffolk County Council and Essex County Council, affecting the administrative areas of the following Local Authorities: South Norfolk Council, Mid Suffolk District Council, Babergh District Council, Colchester City Council, Tendring District Council, Braintree District Council, Chelmsford City Council, Brentwood Borough Council, Basildon Borough Council, and Thurrock Council.
- 2.3 The Project has been sub-divided into eight geographical sections. Brentwood falls within sections F and G:
- Section F – Chelmsford City Council and Brentwood Borough Council
 - Section G – Basildon Borough Council and Brentwood Borough Council (and part of Chelmsford City Council administrative area).

Description of route

- 2.4 Within Brentwood, Section F of the alignment crosses the boundary with Chelmsford and enters the borough in its north-eastern corner to the east of Fryerning, where the Order Limits are adjacent to the Little Hyde Farm and Little Hyde Cottages. At this point of the route, it crosses Green Belt land and also spans the protected Little Hyde Lane, which has been identified for temporary access. From here the route then partially enters Chelmsford, where it crosses the A12 and B1002, and beyond that the Stratford-Chelmsford Railway Line, before continuing south-eastward in Brentwood through its north-eastern corner across Green Belt arable land to the east of Ingatestone and with the Order Limits in close proximity to the Spring Wood Local Wildlife Site. It then continues towards Stock Lane, at which point it crosses the River Wid and re-enters the Chelmsford administrative area.
- 2.5 Again re-crossing the River Wid, the proposal re-enters the Brentwood administrative area to the east of the Padhams Green Road / Buttsbury / Mountnessing Road roundabout and crosses Mountnessing Road at the Buckwyns intersection. At this point the Order Limits are in close proximity to the Harespring Wood Ancient Woodlands and Local Wildlife Site, and the route crosses Green Belt land. The route then turns southward and crosses further Green Belt land until it traverses Old Church Lane and

runs east of the access road to the sewage treatment works. Here it crosses the River Wid and briefly enters the Basildon Borough Council administrative area.

- 2.6 The proposal then re-enters Brentwood immediately south-east of the sewage treatment works and crosses the Shenfield-Billericay section of train line before continuing through more Green Belt land in a westerly direction. Just north of Haverings Grove it makes a dogleg southward turn where it crosses the A129 Rayleigh Road, the main arterial connection between the settlements of Hutton and Haverings Grove. The north side of the A129 is also the location of Woodland Schools (Hutton Manor), Swimming Nature Hutton Manor (swim school) and Oakleigh Farm Horse Livery Stables, all in close proximity and serviced by regular vehicular access.
- 2.7 The proposal then continues through Green Belt land south of the A129 and to the south-west of Haverings Grove, passing to the west of James's Wood Ancient and Semi-Natural Woodland and Local Wildlife Site before re-entering into Basildon Borough Council east of Bladenwood Farm and Little Bladen's Wood Local Wildlife Site, where it then continues through the Basildon administrative area.
- 2.8 The route then re-enters Brentwood on to Green Belt land just to the north of Dunton Road and near to Parkhill Wood Ancient and Semi-Natural Woodland and Local Wildlife Site. It crosses Dunton Road and continues south to where it crosses the A127 Southend Arterial Route and where it is within 50m of the Friern Manor Wood Ancient and Semi Natural Woodland and Local Wildlife Site. At this point the proposal follows the administrative boundary between Brentwood Borough Council and Basildon Borough Council the Basildon side until the south-east corner of the allocated Dunton Hills Garden Village site, where it fully enters the Brentwood Borough Council area before then returning into the Basildon Borough Council administrative area.

Geographical features and designations

- 2.9 The proposal is located primarily on Green Belt agricultural farmland, often under arable production. In some places, such as Hutton and Haverings Grove, the proposed route passes nearby to and even through clusters of urban and rural settlements.
- 2.10 The landform along the route varies and it enters Brentwood through the Heybridge Wooded Farmland (F10) Landscape Character Area (as per the Mid-Essex Landscape Character Assessment 2006), which consists of mature, undulating wooded farmland of medium to large-scale predominantly arable fields, landmark halls and churches, and narrow, often tree-lined rural lanes. This area also lies within the RAMS Blackwater ZOI.

- 2.11 Where the route re-enters Brentwood from Basildon it enters through the Ingrave and Herongate Wooded Farmland (F14) Landscape Character Area, with gently sloping wooded farmland of medium to large-scale field pattern and patches of deciduous woodland dotted across the landscape and a small-scale linear and dispersed settlement pattern. The route continues along the boundary of this character area.
- 2.12 The final element of the route through Brentwood is at the allocated Dunton Hills Garden Village site that is within the Horndon Fenland (G1) Landscape Character Area, marked by large arable and pasture fields on a predominantly flat topography with mature hedgerow field boundaries and a sparse settlement pattern. This area also has views to surrounding wooded hills to the north and south towards Tilbury Power Station.
- 2.13 Heritage features include Scheduled Monuments and listed buildings (Grade I, II* and II), as well as non-designated built heritage assets, including locally listed buildings and historic farmsteads.
- 2.14 The proposal crosses areas of flood risk (Flood Zones 2 and 3) along the River Wid at the northern part of the route through the borough.
- 2.15 Further detail on the specific affected features is provided within the Applicant's ES and under BBC's commentary to the topic headings relevant to this LIR.

3 Details of the Proposal

- 3.1 Within the Brentwood administrative area, the proposal would include the construction of 21 pylons and overhead lines of approximately 50m in height and spaced at approximately 330m for the new 400kV line. The proposal also includes work involved for the decommissioning of 13 pylons and associated lines of the existing 132kV line, as well as work involved for the undergrounding of these lines.
- 3.2 Further details of the Project are included within Chapter 4: Project Description (document reference 6.4) and indicated on Figure 4.1: Proposed Project Design (document reference 6.4.F1) and Figure 4.2: Proposed Project Design – Permanent Features (document reference 6.4.F2).

Draft Order Limits and Limits of Deviation (LoD)

- 3.3 The Order Limits are defined as the maximum extent of land within which the Project, as defined within the ES (Volume 6 of the DCO application), may be carried out, and include both permanent and temporary land required to build, operate and maintain the Project.
- 3.4 The Order Limits include LoD which represent the maximum deviation for permanent features, such as the overhead line, pylons, CSE compounds, new substations and underground cables. This allows for adjustment to the final positioning of Project features to avoid localised constraints or unknown or unforeseeable issues that may arise.
- 3.5 The proposed Order Limits are generally 100m wide, i.e., 50m either side of the centre line of the proposed overhead line.
- 3.6 The vertical LoD would be up to any extent not exceeding 6m upwards from the pylon design heights presented within the Works Plans (document reference 2.3). The reason for this is to address variations in heights between pylons to allow extra height to clear existing features, maintaining electrical clearance to the ground.
- 3.7 The lateral LoD of 50m either side of the centre line and the longitudinal LoD are to allow flexibility to move pylon positions in any direction for unforeseen circumstances, such as poor ground conditions or archaeological finds, and to cater for maximum conductor (overhead line) swing. Commitments to restrict the LoD for specific pylon locations are included within the Outline CoCP (document reference 7.2).
- 3.8 The pylons would be typically spaced at 330m, subject to site constraints.

Construction compounds and laydown areas

- 3.9 Within Brentwood, temporary construction compounds are proposed at:

- Off Brentwood Road satellite compound (TB-Sate2A) (the site lies wholly within Brentwood, accessible off the Brentwood Road in Basildon), east of the proposed TB223 pylon.
- 3.10 This satellite compound is positioned at what is deemed a strategic location along the Project and is smaller than the main compounds along the route. It measures approximately 130m by 110m and serves primarily as local welfare for staff and points for delivery of material to the working areas.
- 3.11 A number of temporary construction laydown areas will also be required. These would be predominantly located at the site access points (or bellmouths) where the Primary Access Routes (PARs) meet the Order Limits. In Brentwood, these are in Haverings Grove south of the A129 Rayleigh Road (west of proposed pylon TB208) and whilst it lies just outside the borough boundary, a second construction laydown area is adjacent to the satellite construction compound noted above, making this a wider construction site.
- 3.12 The construction laydown areas would store stone and other materials to facilitate the construction of the Project (predominantly for the haul roads). Material storage would be needed for the first 12 months of construction and would likely store material to a maximum of 4m in height at any one time. It is assumed that laydown areas would generally be stripped of topsoil which would be stored appropriately and typically surfaced with stone chippings over geogrid. They would be reinstated to their former condition following their use.
- 3.13 In addition to the above, there are also works compounds for the 132kV overhead line mitigation (removal and undergrounding). In Brentwood, these will be located north and south of the A129 Rayleigh Road at PUB47 and PUB43 on the Works Plans (APP-023, 2.3 Works Plans – Section G).
- 3.14 Site staff welfare units (including Portaloos or similar) would also be required at strategically placed locations, to allow construction staff to have access to welfare facilities. In addition, NGET advise materials may be temporarily placed adjacent to any temporary construction areas during construction, for example pylon components before being erected.

Construction period and working hours

- 3.15 It is understood that construction of the proposal would commence in 2027 and continue for four years to 2031 (including demobilisation). Prior to the grant of DCO consent, a number of pre-construction environmental surveys would be undertaken in 2026 and following consent certain pre-commencement operations could take place in advance of construction.
- 3.16 NGET propose the following construction working hours as set out in Requirement 6 of the draft DCO:

- Monday to Friday: 07:00 to 19:00
 - Saturdays, Sundays, Bank Holidays and other public holidays: 07:00 to 17:00.
- 3.17 NGET state that no percussive piling works would take place outside of the hours of 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays.
- 3.18 Unless otherwise agreed with the Local Highway Authority, no Heavy Goods Vehicle (HGV) deliveries would be made to site outside of the hours of 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays.
- 3.19 The following operations are identified as may take place outside the core working hours:
- Trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses
 - The installation and removal of conductors, pilot wires and associated protective netting (included but not limited to) across highways, railway lines or watercourses
 - The jointing of underground cables
 - The continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused
 - Any highway works requested by the Local Highway Authority to be undertaken on a Saturday or Sunday or outside the core working hours
 - The testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities
 - The completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities (NGET caveat that the severe weather conditions referred to means any weather which prevents work from taking place during the core working hours by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access or otherwise) or being contrary to safe working practices)
 - Activity necessary in the instance of an emergency where there is a risk to persons or property
 - Security monitoring
 - Non-intrusive surveys
 - Intrusive surveys
 - Oil processing of transformers or reactors in substation sites

- Delivery to the transmission works of abnormal indivisible loads and any highway works requested by the Local Highway Authority to be undertaken outside the core working hours
 - Mechanical and electrical installation works within buildings once erected and enclosed.
- 3.20 It is understood the core working hours exclude start-up and close-down activities up to one hour either side of the core working.
- 3.21 NGET confirm there is no intention for night working on the proposal as standard. However, there would be occasions where night working is required, as set out in the operations above that may take place outside of the core working hours.
- 3.22 There is also the potential for the trenchless crossing works to be undertaken at night. Parts of the trenchless crossing operations require continuous working to achieve completion of the crossing.
- 3.23 Some road works may also need to be undertaken at night to reduce effects on local traffic.

Construction workforce

- 3.24 NGET estimate that over the four-year construction phase there would be a maximum peak day where approximately 1,720 Full Time Equivalent (FTE) employees would be working on the proposal. Employees would be spread across various work sites along the 180km proposal.
- 3.25 Most workers would be trained specialists, with approximately 10% to be sourced from local labour markets.

Public Rights of Way (PRoW)

- 3.26 A number of PRoWs would be affected by the construction of the proposal. NGET state that discussions with PRoW officers have been held to discuss the management of PRoWs, including managing, diverting and/or temporarily closing PRoWs.

Vegetation clearance

- 3.27 An almost continuous haul road, accessed from temporary access points, would be installed along the entire length of the alignment and would only be discontinuous at major obstructions such as major roads, railways, areas of environmental or historical significance and major watercourses. For OHL construction the road would be typically 6m wide with passing places widening to 8 metres at intervals of approximately 200m.
- 3.28 Vegetation clearance for the construction of the haul road and accesses would comprise:

- A typical 12m swathe of removed vegetation (including hedgerows), allowing for up to 8m haul roads and 2m either side to allow for drainage
- A further 4.5m either side of the 12m swathe would be potentially affected, which includes LoD. Up to 21m of vegetation falls within the potentially affected category.

3.29 NGET advise for overhead line haul roads, the Project would seek to reduce vegetation clearance to a 10m swathe, allowing for 6m wide haul roads and 2m either side for drainage. Passing places would seek to avoid hedgerow crossings, though in some instances this may not be practicable due to visibility/health and safety concerns, and a worst-case it is assumed a 12m swathe would be removed.

Overhead line

3.30 Vegetation clearance would be required for the siting of the proposed pylons and overhead lines. The working areas around each new pylon would be cleared of vegetation and fenced appropriately. Access to each pylon location would be installed. Temporary appropriate technology / material would be required adjacent to each new pylon location, on which to place plant such as cranes and piling rigs. The stone working areas would typically be 60m x 60m (or 70m x 70m for angle/terminal/low-height suspension structures and 80m x 80m for low-height tension structures). Materials would be brought to site on HGVs and would include the steelwork for the pylons and the conductors (i.e., cabling) wrapped around large drums. The base of the pylons would involve the excavation of the soil. Piling (which may include percussive) would be required at some pylon locations, subject to the ground conditions.

Full height pylons

- 3.31 A 40m wide swathe of vegetation would be required to be removed to allow for the construction and operation (and maintenance) of the overhead line (to include all physical infringements to conductor, including conductor swing 20m either side of each overhead line centreline).
- 3.32 An additional up to 8m of vegetation either side of the 40m may need be managed during construction and operation (and maintenance) to allow for electrical clearance from the conductor to be maintained (assumes a generalised allowance of 0.5m growth per year over a five-year period).
- 3.33 Up to a further 22m of vegetation either side of the 8m would be potentially affected, which includes allowances for design flexibility as per the proposed lateral LoD vegetation unaffected: vegetation beyond the 22m would be unaffected.

Veteran trees and hedgerows

- 3.34 In respect of veteran trees, other higher quality trees and hedgerows, NGET refer to measures set out in arboricultural surveys and a desk study.
- 3.35 It is understood that hedgerows beneath the overhead line conductors would be retained in situ. Hedgerow management may be required to meet overhead line electrical clearances (dependent on the hedgerow height) and a temporary 3m section of hedgerow may require cutting to stump to facilitate the stringing of the pylons (pulling through of the bond wire). Any hedgerow within a pylon footprint would require permanent removal and any hedgerow within a working area may require temporary removal.

UKPN and other works

- 3.36 Works relating to works to remove, underground and divert existing low voltage/11 kV/33 kV and Openreach wood pole UKPN infrastructure along the overhead line alignment are detailed in the NGETs description of development. It is understood that the works would be similar to those relating to the 400kV works, but at a smaller scale. The works include:
- 47 Openreach mitigation designs
 - Five UKPN low voltage mitigation designs
 - 89 UKPN 11 kV mitigation designs
 - 21 UKPN 33 kV mitigation designs (two of which are steel lattice pylon overhead lines).
- 3.37 In Brentwood, these works will be carried out to the west of Hutton (to the north and south of Rayleigh Road – Route Identification PUB) and to the southeast corner of the allocated site for the Dunton Hills Garden Village (Route Identification PSC). This will involve the dismantling of 2.1km and 1.9km of overhead line respectively and its replacement with 2.4km and 1.6km of underground cable respectively.

Operation

- 3.38 It is understood that operational and maintenance activity would require a limited workforce. During this, National Grid would require infrequent access to ensure the operational Project is appropriately surveyed, assessed, and maintained. Access would typically be made by foot, 4x4 or tractor & trailer.

Decommissioning

- 3.39 There are currently no plans to decommission the proposal.

4 Planning History

- 4.1 There is no relevant planning history relating to Norwich to Tilbury.
- 4.2 The planning process to date has been that pursuant to initial non-statutory consultation held between April and June 2022, a scoping opinion was adopted by the Secretary of State on 10th December 2022. Additional non-statutory consultation was subsequently carried out from June to August 2023.
- 4.3 In accordance with guidance, a Preliminary Environmental Information Report (PEIR) was prepared thereafter, and statutory consultation was held on this document between April and July 2024. Further targeted consultations were then undertaken between January and April 2025 before the DCO application was submitted in August 2025 and accepted in September 2025.

5 Relevant National and Local Planning Policy Framework

- 5.1 The proposal is defined as a Nationally Significant Infrastructure Project (NSIP), under s14(1)(b) and s16 of the Planning Act 2008, and as amended by the Planning Act 2008 (Nationally Significant Infrastructure Projects) (Electric Lines) Order 2013, as it involves the installation of a new electric line above ground of more than 2 km, which would operate at 400 kV in England.
- 5.2 The grant of development consent is made through the making of a Development Consent Order (DCO) under the Planning Act 2008. The DCO includes a range of consents and powers, some of which are not relevant to planning.
- 5.3 In determining a DCO, the Secretary of State (SoS) must have regard to National Planning Statements. In addition, the Secretary of State must have regard to the following:
- Any Local Impact Report (Section 104(2)(b) of the PA 2008)
 - Any matters prescribed (Section 104(2)(c) of the PA 2008)
 - Any other matters which the SoS thinks are both important and relevant to the SoS decision (Section 104(2)(d) of the PA 2008).

National Policy

National Planning Policy Statements

- 5.4 The overarching National Policy Statement for Energy (EN-1) was published in 2024. This sets out the UK Government's commitment to increasing renewable generation capacity and recognises that in the short to medium term, much of the new capacity is likely to come from onshore and offshore wind.
- 5.5 NPS EN-1 should be read in conjunction with the technology specific National Policy Statement for Electricity Networks Infrastructure (EN-5), published in 2024, which sets out the Government's policy for electricity transmission networks in conjunction with EN1. The policy statement sets out the general principles that should be applied in the assessment of development consent application across the range of energy technologies.
- 5.6 National Policy Statement for Renewable Energy (EN-3) deals with Renewable Energy proposals.
- 5.7 The Government is reviewing the National Policy Statements and undertook consultation on changes to EN-1, EN-3 and EN-5 between April and May 2025.
- 5.8 At the time of preparing this LIR, the current suite of NPS's is relevant to the proposal and under transitional arrangements. These should have

effect for the purposes of the Planning Act 2008. Any emerging draft energy NPS's (or those amended but not having effect) are stated as potentially capable of being important and relevant considerations to the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008, with regard to the specific circumstances of each DCO application.

The Electricity Act 1989

- 5.9 Section 9(2) of The Electricity Act 1989 places general duties on National Grid as a licence holder 'to develop and maintain an efficient, co-ordinated and economical system of electricity transmission...'. Section 38 and Schedule 9 of the Electricity Act 1989 require National Grid, when formulating proposals for new lines and other works, to '...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and shall do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.'

The Climate Change Act

- 5.10 The Climate Change Act 2008 forms the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are adapted to. The Act also establishes the framework to deliver on these requirements.
- 5.11 Through the Climate Change Act, the UK Government set a target to significantly reduce UK greenhouse gas emissions by 2050 and a path to get there. The Act established the Committee on Climate Change (CCC) to ensure that emissions targets are evidence-based and independently assessed. The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to adapt to them. The CCC's Adaptation Committee advises on these climate change risks and assesses progress towards tackling them.
- 5.12 The Climate Change Act originally committed the UK to reducing its greenhouse gas emissions by 80% by 2050, compared to 1990 levels. However, in 2019 this was changed to a target to reduce greenhouse gas emissions by 100% by 2050, compared to 1990 levels. This is commonly known as 'net zero'.
- 5.13 There have been a succession of reports, strategies, policy and statements released by the Government over the past few years aiming to support the realisation of the 2050 net zero target and enable the transition to clean, green and home-grown energy.

Clean Power 2020

- 5.14 The Government has most recently set out an ambition for Great Britain to be supplied by Green Power by 2030. This forms part of a plan to Make Britain a Clean Energy Superpower and is supported by the Clean Power 2030 report as well as the Clean Power 2030 Action Plan: A New Era of Clean Technology, both produced by the National Energy System Operator (NESO).

The National Planning Policy Framework (NPPF)

- 5.15 The National Planning Policy Framework (NPPF) is material to the consideration of the proposal. When deciding DCO submissions s104(2)(d) of the Planning Act (PA) 2008 requires the Secretary of State (SoS) to have regard to any other matters considered both important and relevant.
- 5.16 The National Planning Policy Framework (NPPF) (as amended) has a presumption in favour of sustainable development and this document is what the Statutory Development Policies are required to be in conformity with. The proposal is also required to be in conformity with the National Planning Policy Guidance (NPPG) that supports the NPPF.
- 5.17 Whilst the Government published a consultation on changes to the NPPF on 16th December 2025, BBC will consider this separately with regard to the Norwich to Tilbury proposal.

Development Plan

Adopted Brentwood Local Plan

- 5.18 The Brentwood Local Plan 2016-2033 was adopted in March 2022 and sets the key principles for development within Brentwood. There are several local planning policies that are relevant to the consideration of the proposal.
- 5.19 Strategic Policy MG01 Spatial Strategy seeks to ensure that growth distribution across the borough is directed to the two strategic transit growth corridors, which includes the South Brentwood Growth Corridor that includes the Dunton Hills Garden Village. Strategic Policy BE01 Carbon Reduction and Renewable Energy shows a commitment to reduce carbon dioxide emissions and support renewable energy initiatives, whilst Strategic Policy BE14 Creating Successful Places seeks to achieve well-designed places of distinctive and sustainable communities, which is relevant to the Dunton Hills Garden Village site allocation.
- 5.20 Several other local plan policies are relevant to the consideration of proposals including:
- Strategic Policy MG01: Spatial Strategy

- Strategic Policy MG02: Green Belt
- Strategic Policy BE01: Carbon Reduction and Renewable Energy
- Strategic Policy BE08: Strategic Transport Infrastructure
- Strategic Policy BE09: Sustainable Means of Travel and Walkable Streets
- Strategic Policy BE14: Creating Successful Places
- Strategic Policy BE16: Conservation and Enhancement of Historic Environment
- Strategic Policy NE01: Protecting and Enhancing the Natural Environment
- Strategic Policy NE02: Green and Blue Infrastructure
- Strategic Policy NE08: Air Quality
- Strategic Policy NE09: Flood Risk
- Policy MG04: Health Impact Assessments (HIA's)
- Policy BE03: Establishing Low Carbon and Renewable Energy Infrastructure Network
- Policy BE12: Mitigating the Transport Impacts of Development
- Policy BE15: Planning for Inclusive Communities
- Policy NE03: Trees, Woodlands, Hedgerows
- Policy NE05: Open Space and Recreation Provision
- Policy R01(i): Dunton Hills Garden Village Strategic Allocation
- Policy R01(ii): Spatial Design of Dunton Hills Garden Village

5.21 Other relevant adopted local planning policies and guidance include the Dunton Hills Garden Village Supplementary Planning Document (SPD)(2023), the Essex County Council Minerals Local Plan (2014), the Essex County Council and Southend-on-Sea Waste Local Plan (2017), the Sustainable Drainage Systems Design Guide for Essex (2020), and the Developers' Guide to Infrastructure Contributions (Revised Edition 2020).

6 Assessment of Local Impacts

6.1 The following are identified as the key local issues and main areas of concern:

- Impact on Haverings Grove
- Impact on Dunton Hills Garden Village
- Acceptability of the Environmental Statement

6.2 BBC reserves the right to amend its position on matters or to raise additional topics throughout the examination as deemed necessary, in response to new materials being submitted into the examination. Matters raised in this LIR may, as appropriate, be further expanded upon in other future representations submitted separately as well as the Statement of Common Ground.

Impact on Haverings Grove

Relevant policies

6.3 Strategic Policy MG02 Green Belt, Strategic Policy BE14 Creating Successful Places, Strategic Policy NE01 Protecting and Enhancing the Natural Environment and Policy BE15 Planning for Inclusive Communities seek to deliver attractive, accessible and healthy places in which to live and work and that respond positively and sympathetically to their context, and that use natural resources prudently and protect and enhance the quality of the natural environment.

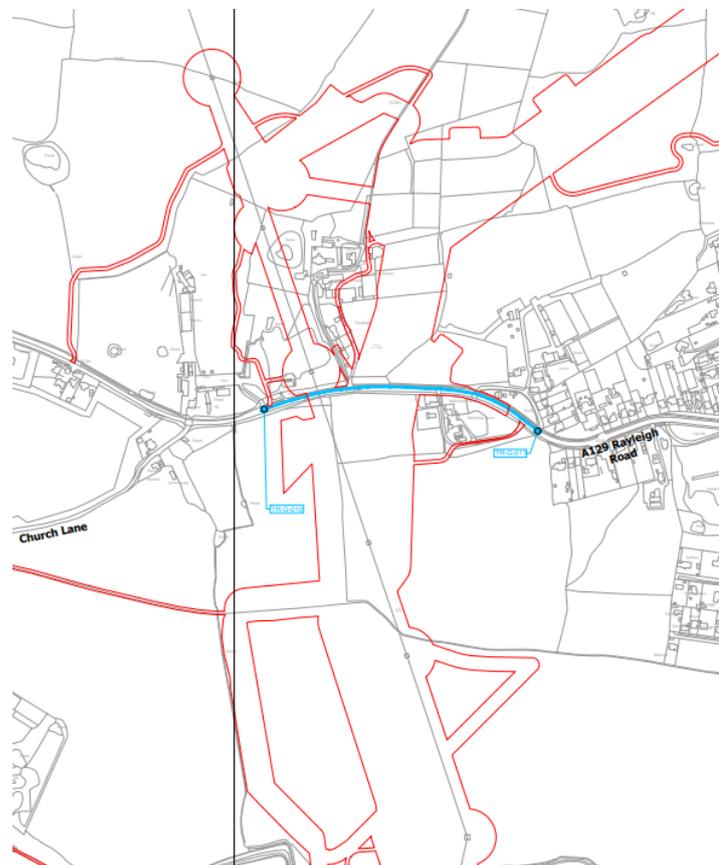
Consideration and adequacy of DCO

6.4 Whilst BBC has previously been receptive to some of the detail changes to the overall proposals at Haverings Grove made during NGET's targeted consultation – including the undergrounding of approximately 2km of the existing UKPN 132kV line, the repositioning of pylons TB209 to TB211, and the relocation of the temporary construction laydown area – the Council maintains its general objection to the proposed alignment that crosses Green Belt land in this locality and severs the two neighbouring localities of Haverings Grove and Hutton.

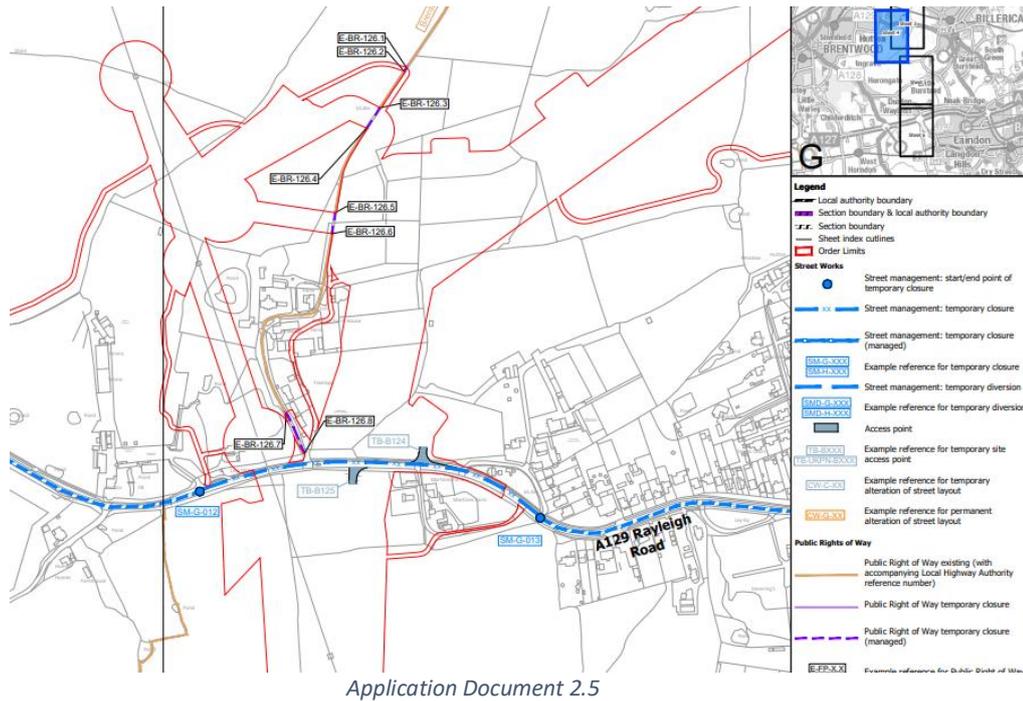
6.5 The fundamental aim of Green Belt policy is to both prevent urban sprawl and to keep land permanently open, which has both visual and spatial qualities. Newly introduced pylons in this area will be approximately 50m high and together with overhead lines, enclosures, boundary treatments and operational equipment, do not form any of the exceptions in paragraph 154 of the NPPF or of the relevant policies in the Brentwood Local Plan, in particular being to maintain its openness. The newly introduced substantial new development will conflict with the fundamental purposes of including this land as Green Belt, be harmful to it and will diminish the openness of the surrounding Green Belt that is predominantly undeveloped and rural in

nature, creating a sense of industrialisation in an otherwise pastoral setting.

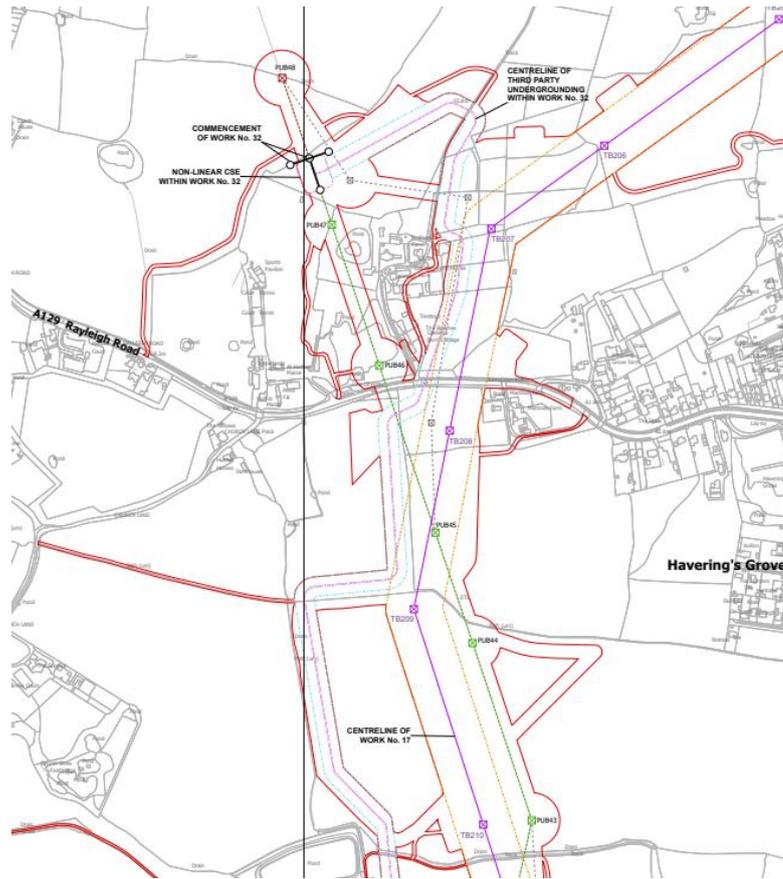
- 6.6 Despite this being a location where OHL's are already present, these are currently the less imposing 132kV line and have become established into the landscape and in the setting. The routing of the more visually imposing 400kV OHL to effectively replace the undergrounded 132kV line is proposed to run along the northern, western, and southern boundaries of Haverings Grove. BBC considers that this will create a visibly harmful and severing effect that, once completed, will act as a more imposing and extended physical barrier between the settlement and nearby Hutton, damage the function and setting of the surrounding Green Belt and be contrary to the strategic policies set out above.
- 6.7 Furthermore, there are a number of receptors in very close proximity to the proposal and indeed enclosed between the Order Limits and access routes – including the Woodland Schools (Hutton Manor & Little Acorn), the Oakleigh Farm Horse Livery Stables, and the Swimming Nature-Hutton Manor swim school – that will be negatively impacted over a prolonged period by the works to both underground the existing 132kV line and construct the new 400kV line. These receptors will all be affected by the disruption caused by construction and construction traffic – including air quality, noise, and health and wellbeing – as well as by any necessary road closures and/or diversions, as indicated by Traffic Regulation Orders TR-G-010 and TR-G-011 (road closure) as noted in the maps below.



Application Document 2.4



- 6.8 In addition to these directly affected receptors, the local economy that is central to the community in the Haverings Grove area – which includes small independent businesses as well as a dance school, a garden centre and religious facilities – is also likely to be affected by traffic disruption and road closures over a prolonged period during the construction and undergrounding work.
- 6.9 The proximity of the transmission line to residential properties at this project ‘pinch point’ further exacerbates the adverse impact on local amenity and community cohesion. In addition, concerns remain regarding the suitability of proposed access routes for the construction compounds, which may result in unacceptable disruption to local agricultural operations as well as local transport movement and management.
- 6.10 The full extent of the severance in this area can be seen in the maps below. This indicates that despite the removal of the existing 132kV line and pylons, the new route of more dominant 400kV line and physical pylon infrastructure creates more of an encircling feature that strongly severs Haverings Grove in three directions. The Order Limits and number of access routes to the construction areas, alongside TRO’s that are central to the broad development area, also indicate significant potential for disruption in relation to the scale of the local community.



Application Document 2.3

Impact on Dunton Hills Garden Village

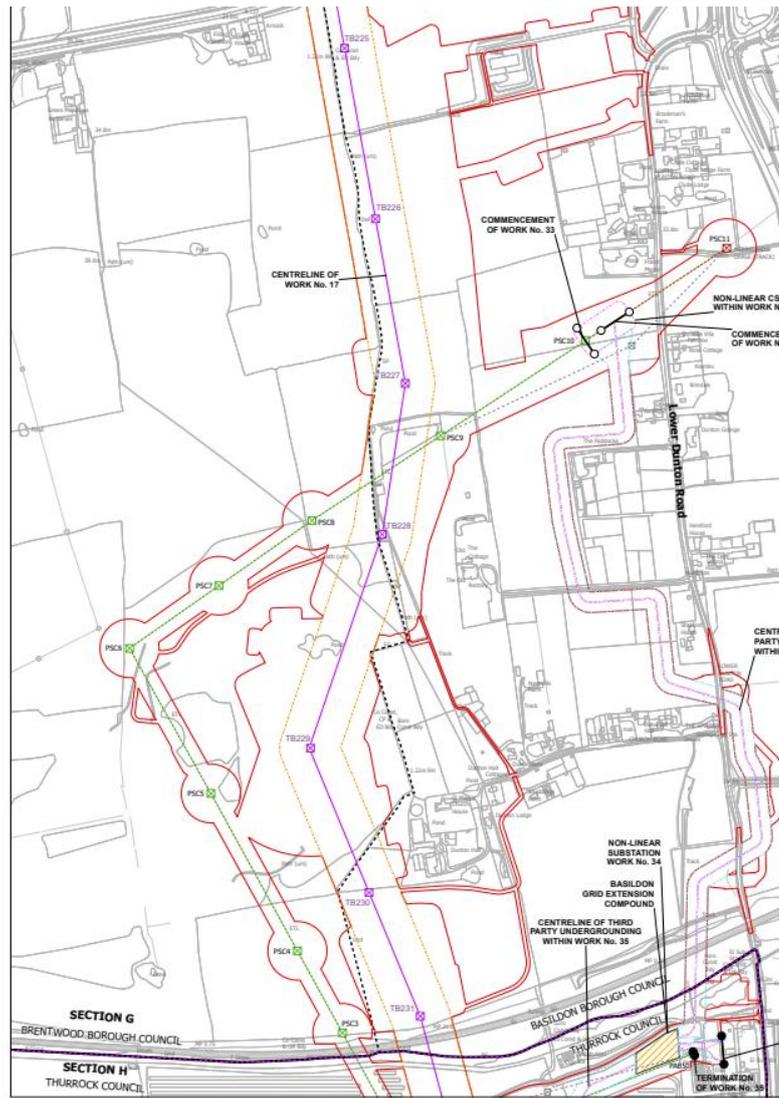
Relevant Policies

- 6.11 Strategic Policy MG01 Spatial Strategy, Strategic Policy BE14 Creating Successful Places, Strategic Policy HP01 Housing Mix, Policy HP05 Affordable Housing, Policy R01(i) Dunton Hills Garden Village Strategic Allocation, and Policy R01(ii) Spatial Design of Dunton Hills Garden Village of the Brentwood Local Plan are all relevant to this site. The Dunton Hills Garden Village Supplementary Planning Document (SPD) (2023) provides the site-specific guidance for this site and is a material consideration in planning decisions relevant to this site.

Consideration and adequacy of DCO

- 6.12 The allocation at DHGV is designated to deliver circa 4,000 new homes together with affordable housing and associated infrastructure to support a sustainable community. Due to BBC's significant green belt constraints on new housing and development, this strategic site allocation (R01(i) and (ii) in the Local Plan) is identified to meet most of the borough's housing need over the Plan period and beyond.

- 6.13 BBC also approved the DHGV Framework Masterplan (February 2020) and the Dunton Hills Supplementary Planning Document (SPD) (January 2023), which build upon the policies for the site allocation in the adopted Local Plan. They additionally set out detailed design principles that are bespoke to the proposed garden village, providing a framework for how the policy requirements in the Local Plan should be translated into a well-designed and successful place.
- 6.14 The Framework Masterplan was established by a range of stakeholders through a comprehensive design review process and sets out the vision for DHGV. In order to ensure the vision for the new Garden Village could be realised, a series of Mandatory Principles were established. These Mandatory Principles relate to Land Use and Spatial Organisation, Vistas, Access and Movement, Landscape, Heritage, Density and Heights. They reflect critical outcomes from the Design Review process undertaken with Design South East and sought to establish a robust framework whilst allowing sufficient flexibility for future detailed designs for the development to emerge.
- 6.15 Formulation and examination of the adopted Brentwood Local Plan, including the allocation of DHGV, pre-date the pre-application process for the Norwich to Tilbury proposals and the Applicant was made aware of DHGV by BBC and ECC partners during the first round of non-statutory consultation in 2022.
- 6.16 This important strategic site allocation should therefore have been fully considered in the evolution of the transmission project. In so doing, the Applicant should have given significant weight to the effect of the pylon route on the overall deliverability of new homes at DHGV, consistent with the TCPA Garden City principles and Policies RO1 & RO2 of the Brentwood Local Plan.
- 6.17 The proposed route of the OHL line runs along the eastern boundary of the DHGV site (in the Basildon authority area, but with full landscape and visual impacts on the wider DHGV site) before entering the southeastern corner of the DHGV site in Brentwood, as illustrated below.



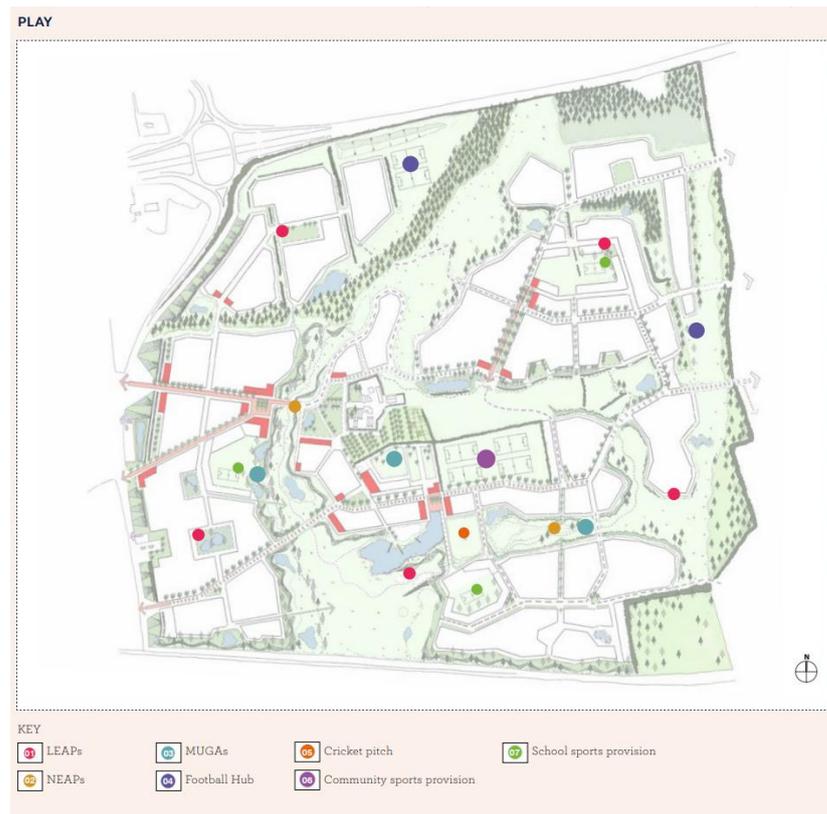
- 6.18 With respect to the impact of the works involved in the proposal on this site allocation, there are three main areas of concern. The first of these is that of the impacts on the Framework Masterplan for the site, which has been worked up on Garden Village principles. The site was first identified by the Government in 2017 as one of several new Garden Villages across England and is one of a small number (14) that is included in Homes England's National Garden Communities Programme, to be both allocated and consented. The objective of the Garden Communities Programme is to create distinctive, high-quality, sustainable communities, which go beyond the qualities of 'standard' housing developments, and which also meet housing needs while improving the quality of life experienced by residents.
- 6.19 Having Garden Village status recognises the potential of the new settlement to embed garden city principles in a locally led vision for the site and the opportunity to develop a distinctive new place that is of high aesthetic and environmental quality, is attractive to live and work in and is a well-designed sustainable development that draws on strong references to the local area and surrounding environment.

6.20 Some of the key Mandatory Principles central to the Framework Masterplan, particularly Landscape, Vistas, and Heritage, have become very compromised by the NGET proposal. Some of the through routes and key viewing corridors – shaped through collaborative feedback from Historic England to connect the natural landscape with listed heritage assets, including St Mary’s Church, the historic farmstead, and All Saints Church – can be seen in the image below.



6.21 From the above Heritage principles overview for the Framework Masterplan, one of its key aims has been rendered undeliverable because of the proposal. The retention of key views across the site, including those towards and between the Church of St Mary just beyond the eastern boundary of the site (so as to not occlude the view from the development in the foreground and middle ground southwest of the site) is a key heritage design feature. However, the proposed alignment of the OHL in the southeast corner of DHGV would interrupt the safeguarded sightlines and adversely impact the view of the Church, contrary to the stated design principle as well as to the SPD and Holford Rule 7.

6.22 A second aim of the Framework Masterplan also now undeliverable relates to open space provision within the layout of the Garden Village, as can be seen in the image below.



- 6.23 The masterplan provides for a Local Equipped Area for Play (LEAP) in its southeastern corner, but this is the location where pylon TB229 is proposed and therefore the masterplan would need to be amended to re-provide this play space. Consequently, the Play Strategy for the Garden Village would not be deliverable in full and the reprovision of this facility elsewhere on the site, if possible, will have an inevitable knock-on effect on the overall integrity of the masterplan.
- 6.24 The final key area of concern regarding DHGV and on the need for it to deliver both affordable housing (a proportion of 35% of total housing) and supporting infrastructure of a cost of more than £250m, is the impact of the proposal on viability, as BBC is aware that the scheme remains highly sensitive to cost pressures and land values.
- 6.25 In BBC's statutory consultation and targeted consultation response, together with ECC and Basildon Borough Council, the locally significant effects arising from the proximity of the proposed pylons and overhead power lines to the proposed residential development was highlighted. BBC considers that the Applicant has not adequately assessed the impact of the proposed alignment on the deliverability and viability of DHGV, again contrary to Holford Rule 7 and NPS EN-1 and EN-5.
- 6.26 Furthermore, evidence commissioned by ECC (Savills) indicates that overhead pylons could reduce residual land value by approximately £17.5m, materially affecting viability and the ability to deliver affordable housing and infrastructure.

- 6.27 BBC is concerned over the absence of any baseline assessment undertaken by NGET in relation to the impacts of overhead line and pylon technology at DHGV and the lack of application of the mitigation hierarchy, including compensation, to the likely locally significant effects arising from these impacts to the principles of the Garden Village and viability of this strategic housing allocation, including its supporting infrastructure.
- 6.28 BBC shares ECC's position to continue to seek measures which mitigate the impact of the overhead powerlines and to secure an underground solution to minimise the impacts on viability and deliverability of both DHGV and emerging development proposals in Basildon Borough directly to the east. If undergrounding is not feasible, alternative pylon designs and robust mitigation should be considered.
- 6.29 BBC also continues to urge that the Applicant provides clear commitments within the DCO to safeguard the delivery of DHGV and associated infrastructure and engages jointly with Brentwood, Essex and Basildon to agree measures that protect strategic growth objectives.

Acceptability of the Environmental Statement

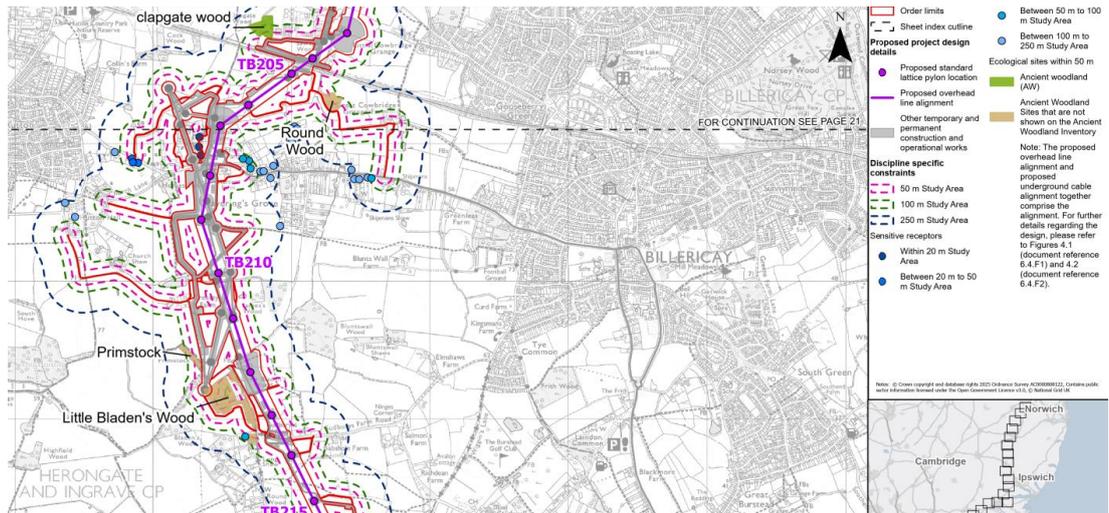
Air Quality

Relevant Policies

- 6.30 Strategic Policy BE14 Creating Successful Places and Strategic Policy NE08 Air Quality of the Brentwood Local Plan address the issue of air quality in seeking to deliver and secure well-designed developments with positive living environments, as well as having regard to their individual and cumulative impacts on air quality.

Consideration and Adequacy of the DCO

- 6.31 BBC remains concerned that the proposed construction activities, including the movement of heavy goods vehicles and haul road operations, alongside the proposed extended working hours, could lead to increased emissions and dust generation, adversely affecting local air quality. These impacts are likely to be most pronounced near high sensitivity receptors such as residential areas and schools, and medium sensitivity receptors such as local centres and recreational spaces, which in Brentwood is particularly the case around the Haverings Grove area. This can be seen in the construction dust study area below.



Document Reference 6.7.F4

6.32 Further adding to BBC’s concerns with respect to this location is that there will be the decommissioning and undergrounding of the 132kV OHL alongside the construction of the new 400kV OHL, suggesting that at times this part of the borough may experience increased levels of both construction and construction traffic, which could have a significant impact on air quality in this locality.

6.33 While the ES sets out the scope of the mitigation measures it is proposing, these do not include any additional mitigation measures beyond embedded and standard, as set out in APP-147 Para 7.6.9. BBC considers that at particularly sensitive areas, such as Haverings Grove, NGET be obliged to engage into robust air quality management, including continuous monitoring at agreed locations, with the view to providing appropriate additional mitigation as agreed between NGET and BBC to address any locally identified impacts as they arise.

Ecology and Biodiversity

Relevant Policies

6.34 Strategic Policy NE01 Protecting and Enhancing the Natural Environment, Strategic Policy NE02 Green and Blue Infrastructure, Policy NE03 Trees Woodlands, Hedgerows, and Policy NE05 Open Space and Recreation Provision set out to protect and enhance the quality of the natural environment in Brentwood and seek improvements to habitats and biodiversity.

6.35 In addition to the above, BBC is further guided by the relevant policies and position of ECC on the County’s ecological and biodiversity assets, including through support of the Essex Wildlife Trust Living Landscape’s vision to ‘restore, recreate and connect wildlife habitats’.

Consideration and Adequacy of the DCO

- 6.36 National Policy Statement (NPS) for Energy EN-1 (Section 5.4 Biodiversity and Geological Conservation, Para 5.4.35) sets out clearly that “Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development”. In Brentwood, the route of the proposal runs within proximity of Spring Wood Local Wildlife Site, Harespring Wood Ancient Woodlands and Local Wildlife Site, James’s Wood Ancient and Semi-Natural Woodland and Local Wildlife Site, Little Bladen’s Wood Local Wildlife Site, Parkhill Wood Ancient and Semi-Natural Woodland and Local Wildlife Site, and Friern Manor Wood Ancient and Semi-Natural Woodland and Local Wildlife Site. Priority habitats, hedgerows, and mature trees along the route are set to be lost and taken together with other major projects, such as Lower Thames Crossing and DHGV, the potential for additional cumulative impacts could be significant.
- 6.37 For the purposes of understanding appropriate mitigation for the impacts of the proposal, BBC considers that as complete as possible ecological assessment surveys of the affected receptors for this thematic area should have been finalised in advance of dDCO submission. However, in establishing impact mitigation there has been a reliance on incomplete surveys and a focus on post-consent mitigation, creating uncertainty about the potential full scale of impacts on protected species and priority habitats as well as the most suitable mitigation for them and extent of it required at this stage. BBC does not consider this acceptable, as any lack of success of a habitat reestablishment, or underestimate of impacts, or misidentification of appropriate mitigation would lead to more harm than originally expected and a weakening of any proposed mitigation measures.
- 6.38 In addition to the above, NPS EN-1 also sets out in the same paragraph that the Applicant should demonstrate that “the timing of construction has been planned to avoid or limit disturbance”. Whilst this may primarily refer to the phasing of the project to accommodate ecological and/or natural environment requirements, BBC considers it is equally relevant in the context of the extended working hours being proposed over the four-year construction schedule. As addressed in the Noise & Vibration section below, these extended working hours will not only cause noise, health and wellbeing effects on human receptors within their proximity, but will have similar and significant negative impacts on local wildlife and ecological receptors in proximity to the proposed works.
- 6.39 BBC notes that BNG is proposed and whilst this is welcomed in principle, BBC believes that given the scale of the project, the Applicant should set a target higher than the 10% minimum of their proposal. Furthermore, there is no clarity as to how off-site habitat creation will specifically benefit Brentwood or how long-term management and monitoring would be secured – and who would be responsible for it – beyond a proposed five-year period. BBC remains concerned that off-site provision for Brentwood

is unclear and that the proposed five-year monitoring period is insufficient to ensure successful and mature habitat establishment.

- 6.40 BBC remains concerned about the adequacy of mitigation for impacts on habitats and species within the Borough. While the ES identifies embedded and standard measures, the Council considers that the scale of the project and reliance on post-consent surveys creates uncertainty about the overall effectiveness of mitigation.
- 6.41 A further matter for BBC and one that it acknowledges is an ongoing discussion with NGET to overcome the potential for significant mitigation failures, is that the Council continues to seek clear requirements for a qualified Ecological Clerks of Works (ECoW) with defined authority to oversee compliance during construction and to prevent harm to sensitive habitats and species.
- 6.42 In light of the impacts noted above, BBC continues to seek full and proper completion of surveys prior to determination and to secure enforceable commitments for robust mitigation and/or compensation for protected species and priority habitats, with compliance overseen by a qualified ECoW. BBC also seeks to secure a strategic biodiversity compensation package and BNG delivery within the Borough, with monitoring extending beyond five years to ensure long-term success.

Health and Wellbeing

Relevant Policies

- 6.43 Strategic Policy BE14 Creating Successful Places and Policy MG04 Health Impact Assessments (HIA's) seek to ensure that developments are well designed and that from the outset they take account of individual and community health, which is central to the growth aspirations of the Council.

Consideration and Adequacy of the DCO

- 6.44 BBC remains concerned that the proposed core working hours of 07:00 - 19:00 Monday to Friday and 07:00 - 17:00 on weekends and public holidays are excessive and significantly exceed standard working hours for construction, which typically restrict weekend and holiday working to protect amenity. BBC recognises that extended hours will increase noise, traffic and general disturbance in sensitive rural and residential areas, which will cause unacceptable disruption to residents. This is particularly the case in the Haverings Grove area, where a significant level of disruption is anticipated to occur.
- 6.45 BBC has received representations indicating that some households within the Haverings Grove and Rayleigh Road corridor include individuals with protected characteristics and complex sensory needs, where noise, vibration, unexpected traffic conditions and sudden acoustic stimuli can cause acute distress. These households report that prolonged construction

activity, including extended working hours and associated traffic behaviours, would disproportionately affect their wellbeing and daily functioning. Given the Public Sector Equality Duty, BBC considers that vulnerable residents in this locality warrant particular regard within the DCO's mitigation framework, including the need for targeted measures to minimise disturbance.

- 6.46 In addition to the above, the Council is also of the view that the impact of the extended working hours on the natural environment will also have a detrimental impact on local resident health and wellbeing, due to both the impacts on local wildlife and also because of the more limited enjoyment of the local natural environment as a result of prolonged noise, dust and traffic effects on it.
- 6.47 To address these impacts the Council continues to seek alignment with local standards and impose enforceable restrictions on working hours to minimise harm to public amenity.

Historic Environment

Relevant Policies

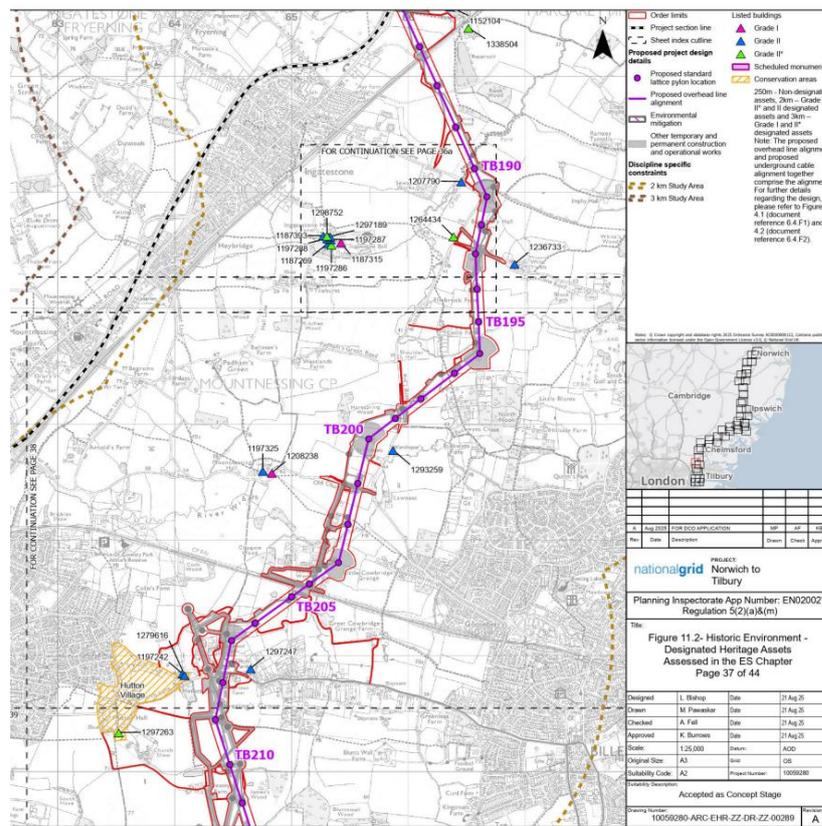
- 6.48 Strategic Policy BE16 Conservation and Enhancement of the Historic Environment gives great weight to the preservation of designated assets and significant weight to the preservation and enhancement of non-designated assets and their setting, including protected lanes. BCC also works together with ECC on the Essex Historic Environmental Record and also with Historic England to ensure its heritage assets are protected, preserved and enhanced where this can be achieved.

Consideration and Adequacy of the DCO

- 6.49 Brentwood contains a number of both designated and non-designated heritage assets, including conservation areas and protected lanes, which are of high value to the Council and its residents. Designated heritage assets relevant to this report include:
Scheduled Monuments: Barn at Ingatestone Hall; Moated Site east of Heron Hall.
Grade I: Ingatestone Hall; Church of St Giles.
Grade II*: Gatehouse and Courtyard Range at Ingatestone Hall; Granary near Ingatestone Hall; Church of All Saints; Granary near Heron Hall.
Grade II: Sixteen listed buildings
Hutton Village Conservation Area
Little Hyde Lane Protected Lane
- 6.50 With respect to these assets, whilst the ES has correctly recognised that they are medium or high value/sensitivity sites, it has only identified less than substantial, lower less than substantial or mid less than substantial harm during both construction and operation. BBC considers that it has not

appropriately captured the magnitude of impact for either construction or operation.

6.51 In light of the above, BBC considers that impacts on the borough's designated assets will independently be substantial rather than a variation of less than substantial, but that in the context of the cumulative effect of pylons, haul roads and associated infrastructure, this will further materially degrade the historic setting of these assets. An example of this can be seen in the map below, which indicates that this section of the route through Haverings Grove and to the north of it will have a severely detrimental impact on the setting of a cluster of listed buildings, rather than individual impacts alone, as well as on Hutton Village Conservation area.



Heritage Impact Haverings Grove & North

6.52 In addition to the above, BBC remains concerned that contrary to NPS EN-1 paragraphs 5.9.7 and 5.9.33, the ES has not adequately assessed the setting impacts on non-designated built heritage assets, including locally listed buildings and historic farmsteads, as well as Little Hyde Lane Protected Lane, part of which is directly within the Order Limits (identified but not assessed in terms of its setting). BBC considers that this omission prevents a fully informed and balanced judgment on overall levels of harm and significance.

6.53 Given all of the above, BBC continues to seek enforceable requirements within the DCO to address heritage concerns, specifically a full

assessment of setting impacts on non-designated heritage assets and locally listed buildings, enforceable commitments for vibration monitoring for designated and relevant non-designated heritage assets within proximity of the works, a clear communication protocol for owners of sensitive structures, and design changes or undergrounding near Ingatestone Hall and DHGV to protect their high-value historic settings.

- 6.54 BBC also maintains its earlier concern that there is no additional mitigation beyond embedded and standard measures and no compensation for residual harm, particularly regarding the Council's negative view of the identified levels of harm on designated assets and on the adequacy of the limited assessments of NDHA. BBC therefore requests that a strategic heritage mitigation and compensation package be secured to offset residual harm to designated and non-designated assets.
- 6.55 The Council is of the general view that the proposed overhead line will result in unacceptable harm to the setting of designated and non-designated heritage assets within the Borough, contrary to Local Plan and also to NPS EN-1 policy requirements, and in tandem with other sections of this report continues to seek undergrounding in sensitive areas and enforceable mitigation measures as a minimum.

Landscape and Visual

Relevant Policies

- 6.56 Strategic Policy BE14 Creating Successful Places, Strategic Policy NE01 Protecting and Enhancing the Natural Environment, and Policy NE03 Trees, Woodlands, Hedgerows all recognise the value of landscape and the natural environment in quality of everyday life, and the contribution that ecological and natural assets make to the character, identity and wellbeing of the borough.

Consideration and Adequacy of the DCO

- 6.57 NPS for Energy EN-1 (Section 5.10 Landscape and Visual, Para 5.10.6) sets out that 'projects need to be designed carefully, taking account of the potential impact on the landscape' and that 'the aim should be to minimise harm to the landscape'.
- 6.58 BBC maintains its position that the proposed OHL in its current route and form will result in unacceptable landscape and visual harm within the borough that is not being properly or adequately mitigated, and therefore continues to object to the alignment within its administrative area due to this harm, as well as to incompatibility with the Council's strategic growth objectives, and for failure to comply with national and local policy requirements.
- 6.59 While the ES acknowledges significant adverse effects within 0.5km of the OHL, BBC maintains its position that adverse impacts relevant to the open

and rural nature of the borough will extend up to 1.5km, particularly in the semi-enclosed landscapes that are characteristic of it. This is particularly the case in the following designated Landscape Character Areas (LCA's) and Visual Receptor Areas (VRA's) in Brentwood:

- VRA G1 Ingatestone & Fryerning – significant adverse effects on PRow and heritage settings
- VRA G4 Ingrave & Herongate – major adverse effects on Thorndon Country Park and Dunton Hills Garden Village
- LCA D2: Brentwood Hills – semi-enclosed hills, high sensitivity, major adverse effects up to 1 km
- LCA 13: Dunton Settled Claylands – wholly impacted; incompatible with Dunton Hills Garden Village vision for a sustainable garden community.

6.60 In addition to the above, BBC would highlight that it considers viewpoint 7.07 in the ES – that has used a 'wireline' image rather than photomontage – does not accurately convey, albeit illustratively, the actual landscape and visual impacts. Other viewpoints, such as 7.06 Thorndon Country Park, have used locations from which BBC considers the impact is markedly less than it would be from alternative viewpoint locations that could equally have been used. BBC disputes the ES assertion that the viewpoints, whether representative, specific or illustrative, were selected in consultation with it, as these do not offer the best or most suitable examples of the extent of impacts on potential receptors.

6.61 The above concerns are heightened by the potential cumulative effects of a multiple, unbroken chain of pylons through different areas of Brentwood and the continuous overhead linear character of the project, which will irrevocably industrialise the currently rural and pastorate landscapes and erode the scenic beauty, tranquillity, and 'sense of place' that is so valued in the borough. This can be amply demonstrated through some of the example photomontages of the ES as seen below:

Viewpoint 7.02: Old Church Lane, Mountnessing Hall (View Direction 159)

Photograph of Existing Landscape from Viewpoint (90 Degree Field of View)



Photomontage of the Project (90 Degree Field of View)



National Grid | August 2025 | The Great Grid Update - Norwich to Tilbury

Legend
Existing vegetation to be removed

Old Church Lane, Mountnessing Hall

Viewpoint 7.03: Church Lane, Hutton (View Direction 153)

Photograph of Existing Landscape from Viewpoint (90 Degree Field of View)



Photomontage of the Project (90 Degree Field of View)



National Grid | August 2025 | The Great Grid Update - Norwich to Tilbury

Church Lane, Hutton

Viewpoint 7.08: Dunton Hills Farm (Dunton Garden Village) (View Direction 95)

Photograph of Existing Landscape from Viewpoint (90 Degree Field of View)



Photomontage of the Project (90 Degree Field of View)



National Grid | August 2025 | The Great Grid Update - Norwich to Tilbury

Dunton Hills Farm / Dunton Hills Garden

- 6.62 BBC also maintains its concern that for landscape and visual impacts in the borough, by offering no meaningful compensation for residual harm the proposals fail to follow the mitigation hierarchy. The Council considers that replacement planting on a 3:1 basis as proposed by NGET is reinstatement rather than compensation, as well as noting that this proposal lacks detail on stock size, biosecurity, and aftercare.
- 6.63 BBC further maintains its objection to the removal of any veteran trees (indicated as ‘potentially affected’ or ‘affected managed’) and any direct or indirect impact on ancient woodland within its administrative area. The Council again considers that the proposed mitigation for this is inadequate and fails to comply with NPS EN1 policy requirements for irreplaceable habitats (Para 5.4.14-5.4.15).
- 6.64 In light of all of the above points and to address the identified local impacts, BBC continues to seek, as a minimum, undergrounding of the line in at least the most sensitive landscape areas – such as Brentwood Hills and DHGV – alongside a comprehensive strategic compensation package either as part of the final DCO or to be put in place as a parallel agreement to offset the landscape and visual harm across the route of the proposed overhead line.
- 6.65 With regard to the local impacts on veteran trees and woodland in the borough and to offset residual harm, BBC continues to seek a full and proper justification for any veteran tree loss and appropriate compensation measures through a strategic tree and woodland compensation package (beyond reinstatement), with replacement planting having to meet minimum standards, (including 10–12 cm girth stock sourced from biosecure nurseries) and maintained in accordance with BS8545.

Furthermore, BBC considers that a draft Arboricultural Method Statement should also be provided to demonstrate the required mitigation to appropriately protect retained trees.

Noise and Vibration

Relevant Policies

- 6.66 National Policy Statement for Energy EN-1 deals with the issue of noise and vibration, highlighting the impact it can have on the quality of human life and outlining mitigation measures for operational and construction noise. As part of the Brentwood Local Plan, Strategic Policy BE14 Creating Successful Places sets out (Part (I)) that development proposals will be required to mitigate the impact of noise, especially in residential areas.

Consideration and Adequacy of the DCO

- 6.67 The route that the NGET proposal will take through Brentwood is predominantly through rural landscapes and at certain points it is within close proximity to residential areas and other noise-sensitive receptors (NSR's). These locations by their nature have lower ambient/background sound levels than urban areas and are therefore more susceptible to small absolute increases in sound that can cause a greater perceived impact. BBC notes that the ES states that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites.
- 6.68 Given the sensitivity of the route and the residential areas along it, in particular that at Haverings Grove, BBC considers that the establishment of a worst-case scenario is fundamentally important for this aspect of the ES. However, BBC has concerns, shared with other authorities along the route, that this has not been the case, in particular with regard to the LoD and with noise impact assessment being carried out on edge of fixed pylon locations only. Given the potential for movement within both the pylon construction area and the LoD, BBC is concerned that uncertainty remains as to whether noise impacts arising from construction activities have been fully and robustly assessed on a worst-case basis.
- 6.69 In addition to the above, for the assumptions for mitigation the Applicant has used a nominal 10 dB noise reduction figure attributed to the application of Best Practicable Means (BPM) in order to assess the likely noise impacts at the nearest NSR's following mitigation, acknowledging that it was a best-estimate of the noise attenuation likely to be achieved. Whilst it was further stated that a more detailed consideration of the level of mitigation required would be undertaken at the detailed design stage by the appointed contractors, BBC considers that a worst-case approach to mitigation should be properly applied at this stage of the assessment and that mitigation should instead take the form of defined temporal restrictions on construction activities.

- 6.70 The impacts anticipated around residential areas and recreational areas is further exacerbated by the proposed extended working hours. Currently, the working hours proposed by the Applicant are 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays, Sundays, bank holidays and other public holidays, as set out in Requirement 7(1) of the dDCO, with a further requirement that would permit start-up and close-down activities to take place for up to one hour either side of the core working hours, with no specified noise limit for this expressed in decibels (dB). BBC is of the view that these working hours, which particularly at weekends provide limited respite for NSR's and can affect health and wellbeing, have the potential to understate the significance of construction noise effects and are excessive in the context of this broadly rural location. BBC considers that if more reasonable construction working hours were adopted, such as Monday to Friday 07:00–19:00 and Saturday 08:00–13:00, in line with the recommended limits set out in BS 5228-1, the likely impacts on NSR's would be significantly reduced.
- 6.71 BBC also notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. Vibration has the potential to cause structural damage and distress to residents if not properly managed and while mitigation measures are referenced, the Council remains concerned about the lack of detail on monitoring and response protocols.
- 6.72 In light of the above points, BBC considers that given the proximity of works to residential areas and other NSR's combined with the proposed extended working hours and start-up/close-down activity times, the mitigation proposed to address this is insufficient and therefore BBC maintains its position that robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate, need to be secured. BBC also maintains its position that pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action should be made binding on the Applicant through enforceable commitments.

Socio-economics, Recreation and Tourism

Relevant Policies

- 6.73 Strategic Policy MG01 Spatial Strategy sets out BBC's ambition for growth along its two strategic transit growth corridors, one of these being the South Brentwood Growth Corridor that includes the Brentwood Enterprise Park and DHGV. In addition to this, BBC is represented by ECC on county-wide issues on this topic matter.

Consideration and Adequacy of the DCO

- 6.74 Whilst Essex is an engine for growth and the county contains some leading concentrations of cutting-edge skills providers, notable in Brentwood at its evolving Brentwood Enterprise Park, BBC maintains its concerns that whilst the Applicant refers to skills development and regional employment opportunities, there is no discernible commitment to Brentwood to deliver measurable outcomes such as apprenticeships, local supply chain engagement, or community investment. Moreover, in setting out that from a total anticipated work force of 4,800 over the four-year construction period that only 10% would be expected to be sourced locally (480 along the entire route), BBC considers that the Applicant is unnecessarily limiting the economic and employment potential that could be gained from the local areas along the route.
- 6.75 The current proposal also fails to clearly articulate tangible benefits for local communities hosting the infrastructure and BBC notes the absence of detail on how the Government's proposed electricity bill discount scheme and wider community benefit funds are to be implemented locally.
- 6.76 As a result of the above issues and in the context of the potential detrimental socio-economic impacts for Brentwood, affecting local residents, businesses, and the visitor economy (through impacts on Thorndon Country Park and other recreational assets), BBC considers that the opportunity for the proposal to generate positive local impacts is in this instance not being properly embraced and could even be foregone without proper collaboration with the affected authorities. This position is further strengthened by the potential cumulative disruption (as set out in the Cumulative Effects chapter) to the local economy, including anticipated strain on local services and potential displacement of existing business activity.
- 6.77 To address these anticipated impacts from the proposal, BBC continues to seek enforceable commitments for a comprehensive social value strategy, including where viable local employment and training targets, support for community facilities, and transparent delivery of community benefit funds to offset the potential significant impacts of the scheme, all of which can be underpinned by the developer providing detailed labour market demand data at as early a stage as possible.
- 6.78 BBC would further encourage the Applicant to proactively engage in mitigation strategies to minimise impacts and work closely with local partners to identify opportunities to support and strengthen the local economy upon this basis, also ensuring that Brentwood-based businesses can benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. This could be set out in a wider Employment, Education, Skills and Supply Chain strategy for the project – at the borough or county level – and secured with appropriate funding

through a Section 106 agreement, all of which could offer an upskilling legacy in the borough.

Traffic and Transport

Relevant Policies

- 6.79 Strategic Policy BE08 Strategic Transport Infrastructure, Strategic Policy BE09 Sustainable Means of Travel and Walkable Streets, and Policy BE12 Mitigating the Transport Impacts of Development are all relevant to the transport impacts of the proposal as they set out to ensure sustainable, safe and secure transport networks serve development and the communities of the borough, and that proposed development does not have an unacceptable impact on the transport network.

Consideration and Adequacy of the DCO

- 6.80 Recognising ECC's role as the Highways Authority, BBC wishes to put on record its more localised concerns regarding the potential impacts of construction traffic on local roads and communities, as well as the impacts of construction on the borough's public rights of way (PRoW) network.
- 6.81 BBC considers that the proposal's Primary Access Routes (PAR) identified in the ES indicate the use of characteristically rural routes in the borough for traffic unsuitable for them and that will therefore also involve the use of Local Road Network (LRN) routes that are inherently unsuitable for this kind of traffic. In Brentwood, these routes include Tilbury Road (A128) – identified in the ES as rural in character and sensitive in nature for accidents, but for which no sensitive receptors have been identified – which raises serious amenity and safety issues for nearby residents, particularly those at Mill Cottages and other nearby sensitive locations.
- 6.82 In addition to the above, the Order Limits as set out in the ES indicate that local roads in the borough, including Little Hyde Lane, Stock Lane, Padham's Green Road / Mountnessing Road, Old Church Lane and Dunton Road (within Brentwood), all have the potential to suffer negative impacts arising from construction traffic on routes entirely unsuitable for it.
- 6.83 Evidence submitted by residents along the A129 reflects that existing conditions already result in periodic congestion and unsafe vehicle behaviour, particularly where narrow rural lanes are used informally as diversion routes during blockages. On several occasions, traffic has become completely gridlocked, with drivers attempting to bypass queues via single-track lanes, creating near misses, excessive horn use, agitation and unsafe conditions for pedestrians, including children with additional needs. BBC considers that construction-related HGV movements, temporary traffic controls and haul-road interactions in this area risk compounding these existing pressures, leading to unacceptable localised severance and safety impacts if not robustly managed.

- 6.84 The Council is also concerned about the cumulative impacts of construction traffic with other major projects either under construction or scheduled for commencement, including but not limited to DHGV, LTC and Brentwood Enterprise Park. Without yet understanding the construction schedule for the NGET project, in combination these projects, for which all three could be happening simultaneously, risk completely overwhelming the local network in this area.
- 6.85 BBC recognises that ECC is the lead on technical matters relating to PRow's, but again wishes to stress the importance of these routes both to its local communities and to the wider visitor economy. The proposed OHL and associated construction works will cause significant severance and disruption to key routes, identified in the ES as Ingatestone and Fryerning (23 & 45) (temporary closure and diversion, and managed temporary closure respectively), Mountnessing (7) (managed temporary closure), Brentwood (90, 96 & 98) (managed temporary closure, managed temporary closure and temporary diversion, and managed temporary closure respectively), West Horndon (62) (managed temporary closure and managed diversion) and West Horndon (68) (managed temporary closure and temporary diversion).
- 6.86 The network of PRow's throughout the borough offers a series of interconnected routes that also link into the county significant routes of the Essex Way and St Peter's Way, as such making them integral to both local recreation and wider tourism in the borough and county. The Council therefore remains concerned that the ES does not provide sufficient detail on closure time frames, temporary diversion details, reinstatement standards, or the potential for legacy improvements from the project.
- 6.87 Considering the points above and in order to address ongoing concerns, BBC continues to support ECC's position that it will be necessary to secure enforceable commitments for a robust Construction Traffic Management Plan (CTMP), including clear routing strategies, restrictions on HGV movements during peak periods, and a programme of road condition surveys with agreed intervention levels. In addition to this, BBC would request full representation on any Traffic Management Forums or equivalent that would be established to ensure the CTMP is properly executed and meets its commitments.
- 6.88 BBC also continues to seek assurances that haul roads will be decommissioned and land restored to its former condition or better, particularly where it affects Green Belt land.
- 6.89 Furthermore, BBC considers it necessary to secure enforceable commitments for a comprehensive PRow Management Plan, including measures to minimise severance (both physical and time periods) during construction, guarantee timely reinstatement to a very high standard, and deliver enhancements to the network where feasible as a legacy of the project.

7 Principle of Development and Alternatives

- 7.1 BBC acknowledges that enhanced transmission infrastructure will play a central role in tackling climate change and in meeting Government targets in the lead up to net-zero by 2050. As part of the Great Grid Upgrade, Norwich to Tilbury is recognised as a proposal that would contribute to the decarbonisation of the UK's energy supply, in accordance with the Clean Power 2030 Action Plan, helping to deliver the Government targets of net zero.
- 7.2 BBC also acknowledges that network reinforcement is necessary to accommodate the expected growth in demand for electricity, taking account of the additional contracted / planned electricity generation in the East Anglia region, and that timing for the project is driven by the need for capacity in the transmission system taking account of the requirements of the National Electricity Transmission System Security and Quality of Supply Standard (SQSS).
- 7.3 The Council is supportive of this national transition towards a low or zero carbon economy and sets out to achieve this through its own Local Plan.
- 7.4 However, BBC considers that the shift towards the delivery of low carbon energy will only be successfully achieved if at scale developments such as Norwich to Tilbury can be appropriately located, taking into account and suitably mitigating the very real impacts they have on the natural environment, landscapes and local communities within which they are to be situated. The national benefit of projects such as this should not, therefore, be secured at the expense of local host communities, landscapes and environments that would for ever be affected by such development and where viable alternatives can obviate this outcome.
- 7.5 From the outset of its engagement on this project and through all stages of consultation, BBC has maintained its position, one supported by ECC, that the 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 OHL's and pylons along its entire length.
- 7.6 BBC is also strongly of the view that a more sensitively designed scheme could deliver not only the best outcome for Essex in the interests of safeguarding the amenities of local communities and the environment, a position again supported by ECC, but that a more sensitively designed scheme would also not impinge upon the planning implications of affected local authorities having to deliver much needed housing, supporting infrastructure and community facilities in their authority areas.
- 7.7 BBC's view is that the currently proposed technical solution involving overhead powerlines supported on pylons will result in the introduction of a significant number of incongruous and intrusive features of industrial scale

and character – with impacts both within and from beyond the borough boundary – into a predominantly open, rural landscape. The effects of this will be permanent and BBC considers that due to the height and scale of the structures involved, the impacts cannot be successfully or wholly mitigated.

- 7.8 Where proposed, the areas of undergrounding of the line are supported – including of the existing 132kV power lines – due to the reduction of visual impact on sensitive landscapes. However, BBC has ongoing concerns regarding the visual impact of the new sections of OHL's to be constructed within and adjoining the borough.
- 7.9 In this respect, BBC is of the view that whilst an offshore High Voltage Direct Current (HVDC) cable solution may be more expensive than the preferred onshore solution with OHLs (although it would be less expensive than an onshore solution with underground High Voltage Alternate Current (HVAC) cables, as set out by 6.3 Environmental Statement Chapter 3 – Alternatives (APP-127)), a more extensive combination of onshore and offshore technologies to mitigate the clear harm should have been considered beyond the areas of underground cabling currently proposed, in order to address the real and significant impacts the OHL's have on the natural environment, landscapes and local communities within which they are situated.
- 7.10 Underpinning this position and as previously advanced by ECC and supported by BBC, it is contended that there has been too great a reliance by NGET on the contracted energy generation position to not only identify the maximum requirement for additional transmission capacity in East Anglia, but also stipulate the tight time frames within which this must be met. The Hiorns Report (as submitted to the ExA with the Norfolk County Council Relevant Representation (RR-2753)) identified that it is extremely unlikely that all the contracted energy generation projects would come forward and/or connect at the volumes stated or dates contracted. It identified a need for sensitivity analysis to assess the likelihood of all contracted projects proceeding (either at all, or by the dates assumed). The report concluded that there was more time available to consider further analysis of potential options, including a potential offshore HVDC link, without prejudicing the development of offshore projects in the East Anglian region. It could therefore not be concluded from the report that the NGET proposal was the best option.
- 7.11 BBC is not aware that NGET has provided or intends to provide 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. The Council therefore considers it essential that in determining what level of future expansion is needed and by when, 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. BBC does not consider it appropriate in terms of proper planning and in seeking

the best outcome for the Applicant to restrict the justification for future network expansion primarily to the ESO contracted position.

- 7.12 The clarification of the contractual position to inform the need and timescale for the planned Norwich to Tilbury Project is therefore still required and until this is evidenced, BBC 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 impacts across the borough.
- 7.13 For Brentwood, the current application proposes OHL's supported on 50m high lattice pylons, with the undergrounding of two sections of existing 132kV OHL's at Haverings Grove and the south-east corner of the allocated Dunton Hills Garden Village site. As such, the proposed scheme will have significant impacts that have been addressed in the relevant sections of this LIR.
- 7.14 If the timing for the network reinforcement is indeed less acute, as suggested by the Hiorns Report, then BBC believes that alternative schemes to the current lattice pylon scheme (such as offshore connections and HVDC undergrounding) should be fully explored in more detail to ascertain whether they would achieve better overall environmental outcomes than the current submitted scheme, at acceptable costs, and if so bring them forward at pace to achieve the required network reinforcement instead of the submitted scheme.
- 7.15 In summary, BBC is fully supportive of the shift towards the delivery of low carbon energy but maintains its in-principle concerns set out here. These are, firstly, that the assessment of alternatives to the current proposal – not subject to contractual time frame demands – need to be fully explored to demonstrate that a less environmentally damaging viable alternative is not available. Secondly, BBC considers that the current proposal can only be acceptably delivered if it takes into account and mitigates the very real impacts it will have on the natural environment, landscape and local communities in the borough, such as at Haverings Grove, within which it is proposed to be situated. This applies equally to planned communities in the borough, such as the Dunton Hills Garden Village site that is scheduled to deliver up to 4000 homes and alongside which the OHL is proposed to run.

8 Cumulative Effects

- 8.1 In accordance with NPS EN-1 (Part 4.3, Para 4.3.3), Applicants for projects subject to the Infrastructure Planning (EIA) Regulations 2017 are required to assess the likely significant effects of the proposed Project on the environment, including the cumulative effects. BBC maintains its ongoing concerns on both the intra-project and inter-project cumulative effects as identified in the ES. This concern is supported by the absence of detailed information on the phasing of the Norwich to Tilbury Project that would be central to a proper understanding of the cumulative effects and would facilitate how to minimise disruption and manage the impacts on host communities.
- 8.2 In respect of the inter-project cumulative effects, the ES acknowledges that from 2027-2030 there will be an overlap between the LTC scheme and the NGET Project. Other than for Landscape and Visual (construction and operation) and Agriculture and Soils (construction, operation and maintenance), impacts have been identified as negligible or minor adverse, and therefore deemed not significant.
- 8.3 BBC considers that contrary to being not significant, the co-location and overlapping construction timeframes are likely to amplify adverse effects across multiple receptors, including traffic, noise, air quality, health and wellbeing, and community amenity – particularly in areas such as Haverings Grove – and that detailed phasing information on the NGET Project is required to develop suitable mitigation against this. Furthermore, while the Applicant has indicated engagement with National Highways to address cumulative impacts, no substantive evidence has been provided to demonstrate how these will be effectively mitigated and National Highways continues to raise its own concerns in this regard.
- 8.4 BBC also reiterates previous concerns on inter-project cumulative effects regarding the wider Brentwood Southern Growth Corridor, which includes DHGV and Brentwood Enterprise Park. For DHGV, other than for Landscape and Visual (construction, operation and maintenance), Agriculture and Soils (construction, operation and maintenance), and Historic Environment (construction, operation and maintenance), impacts have been identified as negligible and not significant. BBC disputes this assessment and considers that it has been informed by inadequate detail of the parallel phasing plans of the respective projects, leading to a general underestimation of the true cumulative impacts and the mitigation required to address them.
- 8.5 In terms of intra-project cumulative effects, again in light of the absence of detailed works phasing, BBC remains unconvinced that impacts have been correctly identified and therefore that proper mitigation can have been given due and proper consideration. This is particularly the case in areas such as Haverings Grove, and whilst the Applicant has identified that Woodland Schools – Hutton Manor and Little Acorn will suffer residual cumulative construction effects, these have been assessed as minor

adverse and not significant. However, as the Order Limits in this location cover an extensive area with multiple access points, including hosting a satellite compound, and cross the key A129 Rayleigh Road transport route, and the proposed works include both the decommissioning of 132kV OHL and construction of 400kV OHL, BBC considers that further assessment of cumulative impacts needs to be undertaken and suitable mitigation identified.

- 8.6 BBC considers that both the intra-project and inter-project cumulative impacts have not been adequately assessed in accordance with national policy and requests that the Applicant be obliged to provide a more robust cumulative effects assessment and commit to enforceable phasing and mitigation measures within the DCO.
- 8.7 BBC also requests that when further information is available on all of the intra-project work phasing for the 2027-2030 period, that the Applicant explore alternative access options aligned with the phasing of DHGV and applicable LTC work to reduce harm and maintain safe and efficient operation of the local highway network.

9 Draft Development Consent Order (dDCO)

- 9.1 BBC acknowledges that the dDCO broadly follows the structure of previously approved DCO's but considers that given the scale and complexity of this Project, it is essential that the Order reflects local requirements and does not simply replicate precedent where this would compromise effective implementation. BBC also notes several areas of the dDCO that require clarification and possibly amendment.
- 9.2 First, the time frames set out in dDCO Schedule 4 Para 1 for discharging requirements must allow sufficient opportunity for the Council to undertake necessary checks, consult relevant stakeholders, and respond appropriately. BBC does not consider that the current dDCO 28-day period from first registration to decision is sufficient for this to be done.
- 9.3 This time frame has been justified by NGET's position that "shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address". BBC does not accept this position for reasons set out in the Principle of Development and Alternatives section above, but wishes to put on record that NGET recognises that they are using shorter time limits that can only act to the detriment of the local authorities along the route.
- 9.4 The Council's concerns on this matter are further heightened by the use in the dDCO of deemed consent after 28 days and/or after approvals being 'unreasonably withheld or delayed', which may be for reasons beyond the Council's controls and with outcomes to the ultimate detriment of its residents.
- 9.5 Similar to the above, Schedule 3 Para 3(1) requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out. Again, BBC considers that this time frame is too short for the requirements it places on the relevant local authorities and believes that further consideration should therefore be given to how the processes and timescales are set out in this and various parts of the dDCO, and their effect on the ability to fully consider and discharge requirements.
- 9.6 Secondly, in relation to dDCO Part 3, Part 6 Section 49, as well as Schedule 2 Part 1, Schedule 2 Part 6, Schedules 5-9 and Schedule 13, ECC has raised detailed concerns regarding protective provisions in its capacity as highway authority for the borough, and BBC supports this need for robust measures to ensure the integrity of the local highway network, particularly in the context of the cumulative impacts as set out in the relevant section above.
- 9.7 Thirdly, in relation to Schedule 3 Parts 7(1) & 7(5) construction hours and Schedule 3 Part 7(2) on percussive piling, the draft Requirements require

further consideration. As set out in the Health and Wellbeing and Noise and Vibrations sections of Assessment of Local Impacts above, BBC considers these hours to be beyond acceptable working hours for a project of this scale, and communities must be given the opportunity to have appropriate periods of respite from intrusive construction activity. BBC considers that this element of the dDCO does not provide this and considers that working hours should be limited on Saturday to 08:00-13:00 and that there should be no working hours at all on Sundays or bank holidays.

- 9.8 In addition to the points above, BBC considers that a post-consent programme of ecological mitigation measures and a BNG delivery plan should also be secured through DCO requirements. The strength of the DCO Requirements in ensuring the delivery of these mitigation measures and BNG plan will be critical in determining what ecological impact the Project ultimately imparts on Essex local authorities.
- 9.9 BBC also maintains its position that further clarity is needed on the scope of authorised development and the limits of deviation, so that the consent granted accurately reflects the development examined.
- 9.10 Lastly, similar to that adopted for the Lower Thames Crossing, BBC also strongly encourages the inclusion of a Register of Requirements within the DCO for the purposes of transparency and accountability and to ensure ongoing fairness and clarity throughout the Project's delivery.
- 9.11 BBC requests that careful consideration be given to all these concerns during Examination with the goal of ensuring that the final Order provides clear, enforceable provisions that protect local communities and the environment along the route that are affected by this Project.

10 Conclusion

- 10.1 BBC recognises the national importance of delivering grid reinforcement to support the transition to a low-carbon energy network and will continue to engage constructively with the Applicant and other stakeholders through the Examination process.
- 10.2 However, the Council considers that the Norwich to Tilbury proposals, as currently submitted, fail to adequately address the significant environmental, social, and economic impacts on Brentwood's communities, landscape, heritage, and strategic growth areas that have been identified in this report.
- 10.3 BBC does not consider that the application demonstrates full consideration of credible alternatives in light of the scale and scope of impacts along the proposed route. As set out in Section 7 above, the Council maintains its objection to the principle of development as currently proposed and seeks reconsideration of an integrated offshore technology solution that would not require pylons and OHL's across 180km – blighting the landscape as well as the potential for deliverability of housing at a time when the Government is seeking to kickstart the economy by building 1.5 million new homes – and would be a 21st century solution to 21st century power demands.
- 10.4 The current proposal also has some significant local impacts on communities in the borough, both present and future. Haverings Grove will be especially affected through construction/decommissioning of pylons, as well as by the lasting legacy of being almost encircled by the new NGET Norwich to Tilbury OHL and more strongly severed from the adjoining Hutton settlement.
- 10.5 The future DHGV settlement is also compromised in terms of its setting, its layout, its provision of open space facilities and potentially also its viability and need to provide significant supporting infrastructure and much needed affordable housing in the borough. This is again in the context of the Government's current goal of building 1.5 million new homes as an economic boon and with the availability of alternative power line technologies, the use of which could avoid these outcomes.
- 10.6 In addition to these two main affected locations, BBC also considers that there will be a number of broader impacts across the borough as a result of the proposal. The Council is of the view that air quality will be generally affected and particularly so in the areas of concentrated proposed construction works (such as around Haverings Grove); that key ecological assets in the borough will be affected and that replacement assets and BNG aspirations remain inadequate; that health and wellbeing of the borough's residents will be compromised by the unnecessarily extended working hours; that the borough's historic environment and in particular its locally valued historic environment has not been properly assessed for the proposal and will therefore suffer significant harm that has not been

identified; that the impacts of landscape and visual harm on the borough from the proposed OHL running both within it and on its boundary edges has not been fully captured and will extend over a wide area and on multiple receptors given its unbroken linearity; that the noise and vibration impacts on the predominantly rural setting that the proposed OHL will run through have been underestimated and will have a more overbearing effect on otherwise tranquil communities and settings, exacerbated by the proposed working hours and potentially further exacerbated by any route amendments within the LoD; that the proposal will have impacts on both local economic centres as well as the borough's broader strategic economic vision, including on its tourism potential as a consequence of disruption from construction, with no clear indication that BBC will derive direct economic benefit from construction of or material supply for the OHL; and that the proposal will have significant impacts on the local transport network as a result of construction traffic that is unsuitable for the roads identified for their use, and from road closures and diversions on the local communities that depend on these local connections for their livelihoods, leisure and everyday needs.

- 10.7 Whilst BBC considers that these above identified impacts are independently significant, they will be intensified by the potential cumulative effects with parallel major developments – LTC and DHGV being the key ones, as well as ongoing development at the Brentwood Enterprise Park – that NGET has not properly taken into account in its assessment or consideration of mitigation. Intra-project cumulative effects also remain an issue, in particular in the Haverings Grove area, where BBC remains concerned that multiple impacts simultaneously will have a significantly detrimental effect on the local quality of life.
- 10.8 BBC requests that the ExA give careful consideration to all of the issues raised in this LIR and seek to secure enforceable commitments within the DCO to address them. This includes, but is not limited to, a comprehensive exploration of offshore alternatives to this proposal followed by undergrounding in recognised sensitive locations, robust mitigation for landscape, heritage, ecology, and amenity impacts, strategic compensation packages, and clear measures to deliver social value and economic benefits locally.

Appendix 1 – Relevant Development Plan Policies (extracts from Brentwood Local Plan 2016-2033)

STRATEGIC POLICY MG01: SPATIAL STRATEGY

Quantum of Development

1. The Council will work positively and proactively with development industry and wider stakeholders to enable the development of the allocated sites identified on the Policies Map in order to meet the borough's housing and employment needs and targets. To facilitate a significant increase in the delivery of new homes as well as jobs to promote sustainable communities, provision is made for:
 - a. 7,752 new residential dwellings (net) to be built in the borough over the Plan period 2016-2033 at an annual average rate of 300 dwellings per year to 2023/24, followed by 400 dwellings per year to 2029/30 and then 984 dwellings per year to 2032/33;
 - b. 13 permanent pitches to accommodate Gypsy and Traveller accommodation needs, distributed across the borough as set out in Policy HP07;
 - c. about 46.64 ha of new employment land, 1,604 square metres (net) of comparison retail floorspace and 4,438 square metres (net) of

convenience floorspace, to enable the creation of at least 5,000 additional jobs.

Growth Distribution

2. The majority of new development is directed to the borough's two strategic transit growth corridors, as illustrated in the Key Diagram, ensuring the benefits resulting from their proximity to existing sustainable transport infrastructure. This strategy has required the release of land from the green belt. The geographic distribution and pattern of growth is planned as follows:
 - a. Central Brentwood Growth Corridor comprising mainly brownfield infill and urban extensions. Three strategic residential-led, mixed-use sites in this location are allocated;
 - b. South Brentwood Growth Corridor comprising largely of employment provision, brownfield redevelopment and a new Garden Village settlement. Two strategic residential-led, mixed-use development sites in this location are allocated;
 - c. Limited growth is planned at suitable sites in two northern villages of Kelvedon Hatch and Blackmore;
 - d. The housing requirements for designated neighbourhood plan areas in the borough are outlined in the table of Figure 4.2.

STRATEGIC POLICY MG02: GREEN BELT

- A. The Metropolitan Green Belt within Brentwood Borough (as defined in the Brentwood Policies Map) will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions. Planning
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permission will not be granted for inappropriate development in the Green Belt other than in very special circumstances.

- B. All development proposals within the Green Belt will be considered and assessed in accordance with the provisions of national planning policy.
- C. The Council will seek to enhance the beneficial use of the Green Belt to provide or improve access to it; to provide or enhance opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity and; to improve damaged and derelict land. Development proposals in or adjacent to the Green Belt (including those the subject of allocations in this plan) will be expected to include measures to achieve these objectives so far as it is possible and appropriate.
- D. For site allocations which are being released from the Green Belt, development proposals should set out ways in which the impact of removing land from the Green Belt are to be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.

STRATEGIC POLICY BE01: CARBON REDUCTION AND RENEWABLE ENERGY

1. Carbon Reduction and Construction Standards

Development should meet the minimum standards of sustainable construction and carbon reduction as set out below:

- a. All major development will be required to achieve at least a 10% reduction in carbon dioxide emissions above the requirements of Part L Building Regulations; and

- b. New Non-residential development will be required to achieve a certified 'Excellent' rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or other equivalent standards.

The version of BREEAM that a building must be assessed under should be the latest BREEAM scheme and not be based on scheme versions that have been registered under at the pre-planning stages of a project. Other construction standards, such as LEEDs or Passivhaus, will be supported provided that they are broadly at least in line with the standards set out above.

2. Renewable Energy

Wherever possible, application of major development will be required to provide a minimum of 10% of the predicted energy needs of the development from renewable energy. Where on-site provision of renewable technologies is not appropriate, or where it is clearly demonstrated that the above target cannot be fully achieved on-site, any shortfall should be provided through:

- a. 'allowable solutions contributions' via Section 106 or CIL. These funds will then be used for energy efficiency and energy generation initiatives or other measure(s) required to offset the environmental impact of the development; or
 - b. off-site provision, provided that an alternative proposal is identified, and the measures can be secured.
- ## 3. Application of major development, including proposals involving the redevelopment of existing floor space, should be accompanied by a Sustainability Statement outlining their approach to the following issues:
- a. adaptation to climate change;
 - b. carbon reduction;
 - c. water management;
 - d. site waste management;
 - e. use of materials;
- ## 4. Where it is not possible to meet these standards, applicants must demonstrate compelling reasons and provide evidence, as to why achieving the sustainability standards would not be technically feasible or economically viable.

POLICY BE08: STRATEGIC TRANSPORT INFRASTRUCTURE

In order to support and address the cumulative impacts of planned and other incremental growth, allocated development within the Local Plan and any other development proposals shall (where appropriate) provide reasonable and proportionate contributions to required mitigation measures to strategic transport infrastructure, including:

- a. circulation arrangements, public realm and multimodal integration around Brentwood, Shenfield and Ingatestone stations;
- b. circulation arrangement and public realm around West Horndon station, and the creation of associated multimodal interchange through phases to support new residents and employees;
- c. improvements to the highway network as deemed necessary by transport evidence or as agreed by National Highways and Essex County Council as appropriate, other statutory bodies, stakeholders and passenger transport providers; and
- d. additional and/or improved pedestrian, cycling infrastructure and bus services connecting development to key destinations such as railway stations, education facilities, employment, retail and leisure.

POLICY BE09: SUSTAINABLE MEANS OF TRAVEL AND WALKABLE STREETS

1. Sustainable modes of transport should be prioritised in new developments to promote accessibility and integration with the wider community and existing networks. Priority should be given to cycle and pedestrian movements and access to public transport.
2. Development proposals should provide the following sustainable measures as appropriate:
 - a. the provision of pedestrian, cycle, public transport and where appropriate, bridleway connections within development sites and to the wider area, including key destinations;
 - b. the creation of safe, secure, well connected and attractive layouts which minimise the conflicts between traffic, cyclists and pedestrians, and allow good accessibility for passenger transport within sites and between sites and adjacent areas, and where appropriate improve

areas where passenger transport, pedestrian or cycle movement is difficult or dangerous;

- c. the provision of community transport measures promoting car pools, car sharing, voluntary community buses, cycle schemes;
- d. safeguarding existing and proposed routes for walking, cycling, and public transport, from development that would prejudice their continued use and/or development; and
- e. any development requiring a new road or road access, walking and cycling facilities and public transport, will be required to have regard to the adopted Essex County Council's Development Management Policies or successor documents, in order to assess the impact of development in terms of highway safety and capacity for both access to the proposed development and the wider highway network.

STRATEGIC POLICY BE14: CREATING SUCCESSFUL PLACES

1. Proposals will be required to meet high design standards and deliver safe, inclusive, attractive and accessible places. Proposals should:
 - a. provide a comprehensive design approach that delivers a high quality, safe, attractive, inclusive, durable and healthy places in which to live and work;
 - b. make efficient use of land and infrastructure;
 - c. deliver sustainable buildings, places and spaces that can adapt to changing social technological, economic, environmental and climate conditions;
 - d. create permeable, accessible and multifunctional streets and places that promotes active lifestyles;
 - e. respond positively and sympathetically to their context and build upon existing strengths and characteristics, and where appropriate, retain or enhance existing features which make a positive contribution to the character, appearance or significance of the local area (including natural and heritage assets);
 - f. integrate and enhance the natural environment by the inclusion of features which will endure for the life of the development, such as planting to enhance biodiversity, the provision of green roofs, green walls and nature based sustainable drainage;
 - g. where applicable, ensure that new streets are tree-lined and opportunities are taken to incorporate trees elsewhere in developments;

- h. employ the use of high-quality street furniture, boundary treatments, lighting, signage, high quality materials and finishes to help create a durable development with local distinctiveness;
 - i. avoid unacceptable overlooking or loss of privacy;
 - j. safeguard the living conditions of future occupants of the development and adjacent residents;
 - k. sensitively integrate parking places and functional needs for storage, refuse and recycling collection points;
 - l. mitigate the impact of air, noise, vibration and light pollution from internal and external sources, especially in intrinsically dark landscapes and residential areas.
2. Proposals for major development should be supported by an area specific masterplan. Where appropriate, the Council will consider the use of a complementary design guide/code, to help guide the necessary design coherence across the entire development site. Design proposals will be expected to:
- a. demonstrate early, proactive, inclusive and effective engagement with the community and other relevant partners;
 - b. have regard to Supplementary Planning Documents and Guidance published by the Council, Essex County Council and other relevant bodies;
 - c. address feedback from the Council through its Pre-application Advice Service and where appropriate, feedback from an independent Design Review Panel.
3. Development proposals should be supported by a statement setting out the sustainable long-term governance and stewardship arrangements for the maintenance of supporting infrastructure including community assets, and open spaces; the statement should be proportionate to the scale of the scheme and quantum of infrastructure being delivered.

POLICY BE16: CONSERVATION AND ENHANCEMENT OF HISTORIC ENVIRONMENT

A. All Designated Assets

1. Great weight will be given to the preservation of a designated heritage asset and its setting. Development proposals affecting a designated asset, including a listed building, conservation area, registered parks and gardens, or scheduled monument, will be required to:
 - a. sustain and wherever possible enhance the significance of the assets and its settings (including views into and out of conservation areas and their settings);
 - b. be supported by a Heritage Statement providing sufficient information on the significance of the heritage asset (according to its importance), the potential impacts of the proposal on the character and significance of the asset and its setting, and how the proposal has been designed to take these factors into account. The Statement should make an assessment of the impact of the development on the asset and its setting and the level of harm that is likely to result, if any, from the proposed development;
 - c. provide clear justification for any works that would lead to any harm to the asset.
2. Proposals that make sensitive and appropriate use of heritage assets, particularly where these bring redundant or under used buildings or buildings on the At Risk Register, into appropriate use consistent with their conservation status will be supported.

3. Proposals designed to enhance an asset and/or its setting and which reinforce its significance and contribution to the character of an area will be supported.
4. Development proposals that would be likely to cause either less than substantial or substantial harm to, or loss or partial loss of, a designated asset or its setting will be assessed in accordance with the statutory framework and national planning policy.
5. Where a proposed development involves the loss or partial loss of a designated asset, applicants will be required to record and advance understanding of the asset in a manner proportionate to its importance and the impact which will be caused.

B. Conservation Areas

In addition to satisfying the relevant criteria in A above:

1. Permission for proposals which involve the demolition or partial demolition of a building in a conservation area will only be granted subject to a condition and/or a planning obligation (as appropriate) that no demolition will take place until an enforceable contract has been let for the carrying out of the new development.
2. Development will be permitted in a conservation area where the siting, design and scale of the proposed development would preserve or enhance its character or appearance and important views into and out of the area are preserved or enhanced.

C. Non-Designated Heritage Assets

Development proposals that affect non-designated heritage assets and their settings, including protected lanes, should seek to preserve and wherever possible enhance the asset and its setting. When considering proposals which are likely to cause harm to such an asset consideration will be given to:

- a. the significance of the asset and its setting; and
- b. the extent to which the scale of any harm or loss harm has been minimised.

D. Specific Requirements

Specific requirements in relation to particular heritage assets identified in housing allocation policies should be read alongside the overarching requirements of this policy.

STRATEGIC POLICY NE01: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT

1. The Council will require development proposals to use natural resources prudently and protect and enhance the quality of the natural environment. All proposals should, wherever possible, incorporate measures to secure a net gain in biodiversity, protect and enhance the network of habitats, species and sites (both statutory and non-statutory) and avoid negative impacts on biodiversity and geodiversity. Compensatory measures will only be considered if it is not possible fully to mitigate any impacts.
2. When determining planning applications, the council will apply the principles relevant to habitats and biodiversity as set out in National Planning Policy.

International Designated Sites

3. Where a proposed development is likely to have an adverse impact on European Designated Site (whether individually or in combination with other plans or proposals) permission will not be granted unless there is due compliance with the requirements of the Habitats Regulations.
4. New residential development within the Essex RAMS and Epping Forest SAC Zones of Influence will be required to provide appropriate on-site measures for the avoidance of, and/or reduction in, recreational disturbance on European Designated Sites through the incorporation of recreational opportunities, including the provision of green space and footpaths in the proposals. Proposals will be required to follow the mitigation hierarchy by seeking to avoid creating recreational impacts first and foremost, with mitigation measures considered separately to avoidance.

Nationally Designated Sites

5. Development proposals within or outside a SSSI, likely to have an adverse effect on a SSSI (either individually or in combination with other developments), will not be permitted unless, exceptionally, the benefits of the proposed development clearly outweigh both the adverse impacts on the features of the site that make it of national importance and any impacts on the wider network of SSSIs.

Sites of Local Importance

6. Development proposals that are likely adversely to affect locally designated sites, including their functional status within any identified ecological network, will only be permitted where the applicant can demonstrate that:
 - a. the ecological coherence of the site and any local ecological network is maintained; and
 - b. it can be demonstrated that the benefits of the development clearly outweigh the loss.

STRATEGIC POLICY NE02: GREEN AND BLUE INFRASTRUCTURE

1. Brentwood's network of green and blue infrastructure (GBI) will be protected, enhanced and managed to provide a multi-functional, high quality open space resource, capable of delivering opportunities for recreation, health and wellbeing, ecological connectivity, biodiversity net-gain as well as wider ecosystem services for climate change adaptation.
2. New development is expected, where possible and appropriate, to maximise opportunities to enhance or restore existing GBI provision and/or create new provision on site that connects to the wider GBI network. Its design and management should also respect and enhance the character and distinctiveness of the local area.
3. Developments on sites containing or are adjacent to a water course or water body (Blue Infrastructure) are required to ensure there is no adverse impact on the functioning or water quality of the Blue Infrastructure. Proposals that maximise opportunities to enhance or restore Blue Infrastructure and incorporate these features into the public realm of the development will be supported. An adequate undeveloped buffer zone should be applied as necessary to mitigate flood risk, in line with Policy NE09 and/or support sustainable drainage, in line with Policy BE05.
4. Proposals should provide appropriate specification and maintenance plans for the proposed green and blue infrastructure throughout the life of the development.

STRATEGIC POLICY NE08: AIR QUALITY

1. Development is required to meet national air quality standards and identify opportunities to improve air quality or mitigate local exceedances and impacts to acceptable legal and safe levels. Development proposals must demonstrate that they will not:
 - a. Compromise the achievement of compliance targets within Air Quality Management Areas (AQMAs);
 - b. Create new exceedance areas; and
 - c. Create unacceptable risk of high levels of exposure to poor air quality, particularly where development is near to, or promotes land uses to be used by those particularly vulnerable to poor air quality (such as children and older adults).
2. Development proposals should be designed to minimise exposure to existing poor air quality and make appropriate provisions to improve local air quality conditions through design solutions and measures to the outdoor and indoor environment. Particular attention should be given to the positioning, layout and design of proposals for new build developments and community infrastructure (indoor and outdoor) that are likely to be used by large volumes of people on a daily basis, especially by vulnerable groups. Community infrastructure should, where possible incorporate appropriate buffer zones to prevent or minimise exposure to air pollution sources.
3. An Air Quality Impact Assessment is required as part of any planning application for:
 - a. major developments;
 - b. employment led developments;
 - c. developments which will require substantial earthworks or demolition;
 - d. developments which include community infrastructure including leisure, education and health facilities or open space (including child play space);

- e. new build developments in areas along busy or congested road and rail lines where residents will be exposed to poor air quality;
 - f. developments which propose the use of Combined Heat and Power, biomass boilers or similar solutions that might impact air quality; and
 - g. new developments within AQMAs.
4. Development proposals should have regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of (A) and (B) above will be resisted unless appropriate measures are implemented to ensure adverse impacts can be mitigated to an acceptable level. Mitigation should be provided onsite unless it can be demonstrated that it is inappropriate and that off-site provision will deliver equivalent or wider benefits.

STRATEGIC POLICY NE09: FLOOD RISK

1. New development will be required to avoid areas of flood risk by applying the Sequential and, where necessary, the Exception Tests in accordance with national policy and guidance.
2. A site specific Flood Risk Assessment must assess all sources of flooding. It should demonstrate how flood risk will be managed over the development's lifetime, taking climate change into account. A site specific FRA is required, in

accordance with national policy guidance, for the following types of development:

- a. all new development greater than 1 ha in size in Flood Zone 1;
 - b. all development within a Critical Drainage Area;
 - c. all new development (including minor development and change of use) in flood zones 2 and 3;
 - d. new development or a change of use to a more vulnerable class which may be subject to other sources of flooding.
3. Where proposals satisfy the Sequential and Exception Tests design proposals should ensure that:
- a. the most vulnerable land uses are located in areas within the site that are at lowest risk of flooding;
 - b. development will be safe for its lifetime taking account of the vulnerability of its users,
 - c. flood risk will not increase elsewhere;
 - d. development would not constrain the natural function of the flood plain, either by impeding flow or reducing storage capacity;
 - e. development is constructed so as to remain operational even at times of flood through resistant and resilient design;
 - f. appropriate mitigation measures are incorporated to address any residual flood risk safely, including safe access and egress for all likely users of the development;
 - g. where necessary incorporate flood resistant and flood resilient design measures such that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment;
 - h. incorporate sustainable drainage systems in line with Policy BE05 Sustainable Drainage, unless there is clear evidence that this would be inappropriate;
 - i. where possible, the development will reduce flood risk overall.
 - j. safe access and escape routes are included where appropriate, as part of an agreed Emergency Response Plan, where required.

4. Where the site is additionally located within a Critical Drainage Area (CDA), development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

POLICY MG04: HEALTH IMPACT ASSESSMENTS (HIAs)

- A. To ensure new development is designed to promote good health, a Health Impact Assessment, will be required for residential proposals of 50 or more units (or less than 50 units at the discretion of the planning authority where the number of units could propose a significant impact on the community and infrastructure) and non-residential developments of 1,000m², or more, and hot food takeaways that are not within a designated town, district or local centre and are within 400 metres of a school entrance. The Health Impact Assessment will be prepared in accordance with the advice and best practice as published by Public Health England and locally through the EPOA HIA Guidance Note, using the most up to date guidance. The purpose of the

Health Impact Assessment is to identify opportunities of positive health impacts and potential negative impacts and how they might be mitigated.

- B. Where significant impacts are identified, planning permission will be refused unless reasonable mitigation or planning controls can be secured.

POLICY BE03: ESTABLISHING LOW CARBON AND RENEWABLE ENERGY INFRASTRUCTURE NETWORK

Renewable energy infrastructure

1. Innovative approaches to the installation and/or construction of energy generation facilities or low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported.

Decentralised energy infrastructure

2. New development proposals of over 500 dwelling units, including brownfield and urban extensions, or where the clustering of new sites totals more than 500 units, should include energy masterplans to incorporate decentralised energy infrastructure in line with the following hierarchy:
 - i. where there is an existing decentralised heat network with sufficient capacity or the capacity to expand, new development will be expected to connect to it;
 - ii. where there is no existing decentralised heat network with sufficient capacity or the capacity to expand, new development will be expected to deliver an onsite heat network, unless it can be demonstrated to the Council's satisfaction that this would render the development unviable;
 - iii. where a developer is unable to deliver a decentralised heat network, it will need to be demonstrated to the satisfaction of the Council that the applicant has fully assessed all reasonably available options for its incorporation and delivery and has designed the development to allow future connection to a heat network unless it can be demonstrated that a lower carbon alternative has been put in place
3. New development will be expected to demonstrate that the heating and cooling systems have been selected according to the following heat hierarchy:
 - i. connection to existing CHP/CCHP distribution network;
 - ii. site-wide renewable CHP/CCHP;
 - iii. site-wide gas-fired CHP/CCHP;
 - iv. site-wide renewable community heating/cooling;
 - v. site-wide gas-fired community heating/cooling;
 - vi. individual building renewable heating.

POLICY BE12: MITIGATING THE TRANSPORT IMPACTS OF DEVELOPMENT

1. Developments must not have an unacceptable impact on the transport network in terms of highway safety, capacity and congestion.
2. New development proposals will be required to be supported by:
 - a. Travel Plans, Transport Assessments and/or Statements in accordance with the thresholds and detailed requirements for each land use category as set out in the Essex County Council's Development Management Policies or its successors; and engage in an appropriate and proportionate assessment process with National Highways where development has a likelihood to have a material impact on the Strategic Road Network which is not otherwise catered for by programmed works or improvements;
 - b. where necessary, reasonable and proportionate financial contributions and/or take reasonable measures to:
 - i. mitigate the cumulative transport impact of the development to an acceptable degree, including relevant highways measures identified in the IDP Part B; and
 - ii. accommodate the use of sustainable modes of transport including borough-wide sustainable transport measures identified in the IDP Part B, investment in infrastructure, services, Low Emission Zone,

or measures to promote behavioural change (including enforcement).

POLICY BE15: PLANNING FOR INCLUSIVE COMMUNITIES

To plan for and build inclusive environment that supports our residents and communities, the Council will require new development proposals to:

- a. provide access to good quality community spaces, services and amenities and infrastructure that accommodate, encourage and strengthen communities and social interaction for all users;
- b. create places that foster a sense of belonging and community, where individuals and families can develop and thrive;
- c. ensure that streets and public spaces are planned for everyone to move around and spend time in comfort and safety, are convenient and welcoming with no barriers to the disabled or impaired, providing independent access without additional undue effort, separation or special treatment;
- d. ensure buildings and places are designed in a way that everyone regardless of their ability, age, income, ethnicity, gender, faith, sexual orientation can use confidently, independently, with dignity and without engendering a sense of separation or segregation; and
- e. ensure that new buildings and spaces are designed to reinforce inclusivity of neighbourhoods and are resilient and adaptable to changing community requirements.

POLICY NE03: TREES, WOODLANDS, HEDGEROWS

1. Development proposals that would result in the deterioration or loss of irreplaceable ancient woodland and ancient and veteran trees will not be permitted other than in wholly exceptional circumstances and only if the proposals include a suitable compensation strategy. Applicants will need to demonstrate the efficacy of the strategy by reference to the value of the habitats that will be lost or harmed and provide an appropriate implementation and maintenance programme to underpin the strategy the performance of which will be subject of a condition and/or planning obligation, as appropriate.
2. In all other cases, proposals should, so far as possible and practicable, seek to retain existing trees, woodlands and hedgerows where they make a positive contribution to the local landscape and/or biodiversity or which have significant amenity value. Wherever possible and appropriate, landscaping schemes should take account of and incorporate these existing features in the scheme and where any loss is unavoidable, incorporate measures to compensate for their loss.

POLICY NE05: OPEN SPACE AND RECREATIONAL FACILITIES

1. All open spaces, including the designated Urban Open Spaces, as identified will be protected and where necessary enhanced to ensure access to a

network of high quality provision and opportunities for sport, play and recreation within the borough. The loss of open spaces and any ancillary facilities, such as sports, play and recreation provision, will not be permitted unless it can be demonstrated that:

- a. an assessment has been undertaken which clearly shows the provision and the function it performs is surplus to requirements; or
 - b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable, accessible location within the local catchment area; or
 - c. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss.
2. New development is required to maximise opportunities to incorporate new publicly accessible, high quality and multi-functional open space and/or, where appropriate, enhance existing provision that will serve the new and existing community, through improved connections, biodiversity net-gain and high quality sport, play and recreational amenities.
 3. The amount and type of provision required will be determined according to the Council's identified needs, as set out in its Open Space and Play Pitch Strategy and adopted open space standards; with regard to children's play space, the Council will seek proposals which meet the Fields in Trust minimum standards (see Figure 8.3).
 4. Where it can be clearly demonstrated that proposals are not able to incorporate new provision or enhance existing provision to serve the new community, then a commuted sum may be requested in line with Policy MG05 Developer Contributions where such contributions will provide alternative or enhanced and conveniently accessible off-site open space provision.
 5. Proposals for the inclusion or enhancement of supporting and ancillary uses and facilities on open space, such as sport, play and other supporting recreational provision, should meet the following criteria:
 - a. the proposed facilities help improve the quality of the open space and promote inclusive access to a wide range of users and recreational interests;
 - b. are demonstrably ancillary to the use of open space and its primary function, e.g. play/sports fields;
 - c. help to contribute to both the character and amenity of the area and are appropriate and proportionate to the function and nature of the open space;

- d. do not have a detrimental impact on the environmental function of the open space.
6. Maintenance plans should be submitted at planning application stage for all new facilities to ensure their long-term quality and management.
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POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

1. In line with Policy MG01, land at Dunton Hills (east of the A128, south of the A127 and north of the C2C railway line, approximately 259.2 ha in size) is allocated for residential-led mixed-use development to deliver Dunton Hills Garden Village.
2. The development will deliver a mix of uses to comprise around 1,650 homes in the plan period (as part of an overall indicative capacity of around 4,000 homes, the remainder to be delivered beyond 2033) together with necessary community, retail and employment development and comprehensive infrastructure to support a self-sustaining, thriving and healthy garden village.
3. The development proposals shall accord with all other relevant policies in this Plan (including the master planning and delivery requirements of R01(ii)).

Housing Mix

4. Development proposals shall deliver an appropriate variety of housing types and tenures in accordance with the Borough's identified needs and the specific needs of Dunton Hills Garden Village. They shall include the provision of:
 - a. self-build and custom build plots in accordance with Policy HP01;
 - b. specialist accommodation including three care homes of around 80 beds each, or an appropriate mix of specialist accommodation to meet identified needs, in accordance with Policy HP04;
 - c. affordable housing in accordance with Policy HP05; and
 - d. a minimum of 5 serviced Gypsy and Traveller pitches, the location of the pitches and the timing of their provision to be identified in the masterplan.

Employment Development

5. Development proposals shall deliver around 5.5 hectares of employment development distributed across the village that may include office, light industrial and research and development uses coming within use class E and other employment development that is complementary to, and compatible with, the residential development.

Main Town Centre Uses

6. Development proposals shall deliver main town centre uses in the form of a district shopping centre and such additional local centres (in accordance with Policy PC04) as may be appropriate in order to optimise the self-sufficiency of the village. These centres shall also include the community and health facilities and related infrastructure necessary to support the village's residential and working community.

Schools and Nurseries

7. Development proposals shall make provision for:
 - a. a site for one secondary school (Class F1) (around 7.9 hectares) with capacity to co-locate one primary school and one early years and childcare nursery facility;
 - b. sites for an additional two primary schools with sufficient capacity to co-locate early years and childcare nursery facilities (around 2.1 hectares each);
 - c. a site for a further primary school with capacity to co-locate early years and childcare nursery facilities (around 2.1 hectares) in the eventuality primary education provision is not co-located with the secondary school; and
 - d. an additional stand-alone early years and childcare nurseries (around 0.13 hectares);

Green and Blue Infrastructure

8. Not less than 50% of the total allocated area shall comprise green and blue infrastructure which should, so far as possible, be of a multi-functional nature.

Mobility Hub

9. Development proposals shall make provision for a mobility hub that should relate well to the district centre.

POLICY R01 (II): SPATIAL DESIGN OF DUNTON HILLS GARDEN VILLAGE

Master Planning, Design and Layout

1. All development proposals in relation to the site shall be in accordance with an approved masterplan. The masterplan shall relate to the whole of the
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allocated site and be produced in consultation with local communities and all relevant stakeholders and shall include a statement that sets out how community and stakeholder involvement has influenced the design and layout of the submitted scheme and its intended delivery. The masterplan shall be submitted to the Council for its approval as part of the initial application for planning permission.

2. The Masterplan shall:

- a. be locally led with the community and relevant stakeholders, in accordance with the Statement of Community Involvement;
- b. show the intended overall design and layout of the development and the proposed distribution and location of uses across the allocated site which shall accord with, be based upon and promote, garden community principles;
- c. demonstrate how heritage assets and their settings will be sympathetically and appropriately integrated into the development taking into account the requirements of para.3 (j) and (k) below;
- d. identify the proposed transport links, including access to the site and main internal highway links, and principal walking, cycling and bridle links (including links to the surrounding network);
- e. show all structural landscaping and the treatments to be provided (including boundary treatments and measures to ensure visual separation from Basildon);
- f. incorporate a green and blue infrastructure (GBI) plan which is informed by a comprehensive wildlife and habitat survey and heritage and landscape character assessments;
- g. show all intended links to the surrounding footpath and cycleway network and indicate potential footpath and cycleway links towards Basildon from the east of the allocated site;
- h. show how development will safeguard, maintain and, where possible, enhance key views in and across the allocated site;
- i. provide for convenient pedestrian and cycle links through the allocated site towards West Horndon Station;
- j. show how the development will incorporate the full range of sustainable transport measures, including dedicated bus services and the location and nature of a mobility hub;

- k. identify the locations and forms of the district and local centres, including the community and healthcare facilities to be provided within them; and
 - l. include a phasing and implementation plan which should secure the phasing of development across the whole of the allocated site to ensure that the development will be carried out in a manner that co-ordinates the implementation and timely delivery of such on and off-site infrastructure as shall be necessary to support each phase of the development and to ensure that:
 - i. its impacts are satisfactorily and appropriately mitigated;
 - ii. there are adequate supporting facilities (including access to adequate green and blue infrastructure, leisure and sporting facilities, shops, health, community and educational facilities) that will allow the early establishment of a self-sufficient and cohesive community; and
 - iii. occupiers have an appropriate range of sustainable travel options at their disposal, including access to bus services and the cycle and pedestrian link to West Horndon Station.
3. Development proposals should:
- a. ensure that detailed design and layout take into account the guidance contained in an adopted Garden Village Design Supplementary Planning Document;
 - b. ensure that the distinct spatial, landscape and heritage qualities of the site and its surroundings are maintained or enhanced;
 - c. ensure that the design of neighbourhoods is such that they are harmoniously integrated to form an overall Dunton Hills Garden Village identity and distinctiveness;
 - d. combine to provide an appropriate range of densities across the site to ensure a compact and highly networked, walkable and fine-grained environment with a highly connected street-based layout that encourages walking and cycling;
 - e. provide, or relate appropriately to, well-located multi-functional green infrastructure to promote safe, and attractive environments for leisure, informal and adventure play areas, recreational and sporting activity with appropriate levels of surveillance;
 - f. promote coherent signposted internal footpath and cycleway routes that provide, where appropriate, links to the surrounding network with sympathetic transitions between the rural and urban environment;

- g. provide or contribute to a highly connected and biodiverse ecological network that incorporates existing habitats of value and natural features and, wherever possible and appropriate, the enhancement of existing, or the creation of new, habitats; and
- h. provide an appropriate level of formal sports pitches and facilities to meet the evolving needs of the community;
- i. ensure the public right of way (PRoW) network is retained, maintained and enhanced;
- j. take into account the findings of the Council's Heritage Impact Assessment for Dunton Hills Garden Village and the applicant's own heritage impact assessment and demonstrate what measures have been taken to sustain the significance of any affected designated and non-designated heritage asset and its setting, whether on or off-site and, wherever possible and appropriate, include other measures to provide enhancements to their settings; and
- k. take into account the results of a programme of archaeological evaluation based upon a geophysical survey of the development area.

Delivery and Legacy

- 4. The development shall be delivered in accordance with the phasing and implementation plan.
- 5. A mobility hub shall be delivered prior to the first occupation of the development with provision for its enhancement and expansion during later phases to be secured through a planning obligation.
- 6. Where directly related to Dunton Hills Garden Village applicants will be required to make necessary, appropriate and reasonable financial contributions via planning obligations towards:
 - a. off-site highway infrastructure improvements as may be necessary and reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the A127/128 junction, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;
 - b. necessary bus services to nearby school facilities prior to the delivery of on-site school facilities which services shall be secured before first residential occupation of the development;

- c. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each phase of the development;
 - d. off-setting improvements to the Hartswood Golf Course.
7. Appropriate restrictions on the occupation of the development will be imposed subject to the carrying out and completion of necessary highway works to secure safe and convenient access to the site, including any necessary improvements to the A128 corridor.
 8. Proposals shall include a supporting statement which addresses the long-term governance and stewardship arrangements (including the management, maintenance and renewal) of the green and blue infrastructure, the public realm, community and other relevant public facilities. Planning obligations will be sought to secure the long term funding, maintenance and stewardship of the assets where necessary.
 9. Proposals shall include a supporting statement that includes initiatives to ensure that new jobs created are offered to local people, as far as may be reasonably possible.

Glossary of Acronyms and Abbreviations

(Including for additional reference those found throughout the NGET Environmental Statement)

AONB – Area of Outstanding Natural Beauty
ACL - Agricultural Land Classification
AIL - Abnormal Indivisible Loads
ANGSt - Accessible Natural Green Space Standards
AW – Ancient Woodland
BEIS – Department of Business, Energy and Industrial Strategy
BMV – Best and Most Versatile
BNG – Biodiversity Net Gain
BPM – Best Practicable Means
B2T – Bramford to Twinstead
CIT – Carbon Interface Tool
CO2e – Carbon Dioxide Emissions
CSE Compound – Cable Sealing End Compound
CEMP – Construction Environmental Management Plan
CFA - Climate Focus Area
CoCP – Code of Construction Practice
DEFRA - Department for Environment, Food and Rural Affairs
DLUHC – Department for Levelling Up, Housing and Communities
DCO – Development Consent Order
dDCO – Draft Development Consent Order
EA – Environment Agency
ECAC - Essex Climate Action Commission
ECC – Essex County Council
EIA – Environmental Impact Assessment
ES – Environmental Statement
ECAC - Essex Climate Action Commission
ExA – Examining Authority
FRA – Flood Risk Assessment
GLENRS - Greater Essex Local Nature Recovery Strategy
GHG – Greenhouse Gas Emissions
GI – Green Infrastructure
GSP – Grid Supply Point
HA – Hectares
IEMA – Institute of Environmental Management and Assessment
IPC – Infrastructure Planning Commission
LEMP – Landscape and Ecological Management Plan
LIR – Local Impact Report
LLFA – Lead Local Flood Authority
LOD – Limits of Deviation
LNP - Local Nature Partnership
LPA – Local Planning Authority
LWS - Local Wildlife Site
LVIA – Landscape and Visual Impact Assessment
MAR – Minerals Assessment Reports

MLP - Minerals Local Plan
MRA – Minerals Resource Assessment
MSA – Minerals Safeguarding Assessment
MWPA – Minerals and Waste Planning Authority
NGET – National Grid Electricity Transmission
NPPF – National Planning Policy Framework
NPS – National Policy Statement
NPSNN – National Policy Statement for National Networks
NSR – Noise Sensitive Receptors
OS - Ordnance Survey
OWSI – Outline Written Scheme of Investigation
PA – Planning Act
PFRA - Essex Preliminary Flood Risk Assessment
PINS – Planning Inspectorate
PWS - Private Water Supplies
PRoW – Public Right of Way
REAC - Register of Environmental Actions and Commitments
SoCG – Statement of Common Ground
SoS - Secretary of State
SSSI – Site of Special Scientific Interest
SuDS – Sustainable Drainage System
SWMP – Surface Water Management Plan
TA – Transport Assessment
TCPA – Town and Country Planning Act