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Your ref: EN020027  
My ref: 24/00001/NSIP  
Telephone: 01245 606826  
Date: 12<sup>th</sup> March 2026

Dear Ms Hunt

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

**Norwich to Tilbury Project - Procedural Deadline 2 Response from Chelmsford City Council (CCC)  
Host Authority reference [REDACTED]**

Following the receipt of National Grid Electricity Transmission (NGET)'s, comments (REP1-132) to Chelmsford City Council's (CCC) Relevant Representation Submission (RR-0545) which are contained within Table H1.1, pages H1 – H42, CCC has the following comments.

At the time of writing, NGET has not responded to CCC's Local Impact Report, (REP1-153), and CCC will defer its detailed responses to the Applicant's comments, due to be submitted at Deadline 3.

**Response to Relevant Representations**

**Needs Case - Table H1.1, CCC paragraphs 3.4-3.7, pages H2-H3**

No further evidence is to be submitted by NGET to support the need for the project. CCC is dissatisfied that no additional evidence will be provided. CCC is unable to fully support the need case put forward by NGET.

**Alternatives - Table H1.1, CCC paragraphs 3.8-3.9, page H3**

CCC notes that NGET does not intend to provide any further evidence in relation to alternatives, including updated sensitivity testing, reconsideration of offshore or HVDC options, or additional analysis addressing the conclusions of the Hiorns Report. CCC remains dissatisfied with this position, given the outstanding questions regarding the assumed timing of network reinforcement and the lack of transparency around contracted generation and connection readiness.

CCC remains concerned that the substantial landscape and visual impacts of the proposed overhead line have not been weighed against credible alternative approaches that could materially reduce such harm.

In the absence of this further evidence, CCC is unable to agree that NGET has demonstrated that credible alternatives have been robustly assessed in accordance with NPS EN-1 and EN-5.

### **Planning Policy - Table H1.1, CCC paragraphs 5.11-5.12, pages H4 and H5**

CCC notes NGET's disagreement and appliance of Green Belt policy. CCC considers that the very special circumstances put forward by NGET do not justify the harm caused by the development on the openness of the Green Belt.

### **Landscape and Visual (Great Waltham and Little Waltham) - Table H1.1, CCC paragraphs 5.23 – 5.37, pages H5 – H7**

CCC notes NGET's disagreement regarding the assessment of effects and the nature of the impacts. CCC disagrees and remains concerned that the substantial landscape and visual impacts, heritage impacts and amenity impacts have not been appropriately weighted nor appropriate mitigation measures provided that could materially reduce such harm.

### **Design Change (Great Waltham and Little Waltham) - Table H1.1 CCC paragraph 5.43, page H11**

To provide certainty and enable finalisation of the overall approach within the Statement of Common Ground. CCC requests that NGET confirms the proposed design change / use of the alternative approach no later than Deadline four.

### **Alternatives (Great Waltham and Little Waltham) - Table H1.1, CCC paragraph 5.44, page H11**

CCC reiterates its preference for an alternative proposal / routing to be used, due to the level of harm that the pylons would have on the gap between Great Waltham and Little Waltham. The impact upon Great Waltham and Little Waltham remains a key area of dispute, particularly with regard to the level of harm, proposed route and siting, and lack of mitigation / compensation.

### **Historic Environment (Great Waltham and Little Waltham) - Table H1.1, CCC paragraph 5.46, page H11**

NGET suggests that there is no requirement to provide additional mitigation or compensation yet recognise that compensation can be provided as part of the overall mitigation strategy, which is extensively referenced in the National Policy Statements.

CCC considers that there has been insufficient assessment of the impacts to the historic environment. This means that the potential for effects is greater and therefore further mitigation /compensation needs to be considered further.

### **Ecology and Biodiversity - Table H1.1, CCC paragraphs 5.65 – 5.75, pages H14 – H16**

CCC remains concerned regarding the lack of appropriate detailed assessment at outline stage. The repeated assertion that further detail "will be provided during detailed design" is not considered acceptable for a project of this magnitude, where the scale of tree and hedgerow loss, should be more clearly evidenced at the outset. CCC considers that detailed information should be provided prior to determination to enable the full effects upon these features to be considered / appropriately mitigated.

### **Community Impact - Table H1.1, CCC paragraph 5.78, pages H16 – H17**

NGET suggests that a "small minority of the population" are likely to be affected and change in quality of life may be moderate. This is considered to result in a minor adverse (not significant) health effect for both the general population and vulnerable groups. CCC consider that NGET has not addressed the impact sufficiently. Mitigation, compensation or resiting, should be introduced to reduce the effect of the Project

upon these properties, such that their level of harm is consistent with that experienced by the wider population.

**Noise and Vibration - Table H1.1, CCC paragraphs 5.80, 5.133, 5.132 pages H17 and H28**

CCC consider that it is reasonable and practicable to exclude Sunday and Bank Holiday working, particularly at directed affected receptors. CCC has provided details of those within its Local Impact Report and will await NGET's comments.

**Historic Environment (Non-Designated Heritage Assets) - Table H1.1. CCC paragraph 5.87, page H19**

CCC maintains its position regarding the adequacy of the assessment on non-designated heritage and landscape. It has consistently shared its concerns with NGET at pre-application stage.

**Historic Environment (Landscape Screening) - H1.1, CCC paragraph 5.92, page H20**

CCC consider that consultation on the provision of landscape screening should include a mandatory requirement to consult with Local Planning Authorities / Heritage specialists.

**Landscape and Visual - Table H1.1, CCC paragraphs 5.116 and 5.125, pages H25 and H27**

NGET refers to NPS-EN1 and NPS - EN5 and suggest that there is no requirement to provide additional mitigation or compensation, yet they recognise that compensation can be provided as part of the overall mitigation strategy, which is extensively referenced in the National Policy Statements.

CCC considers that there has been insufficient assessment and granularity of the impacts to the landscape. This means that the potential for effects is greater and therefore further mitigation /compensation needs to be considered further.

**Socio Economics - Table H1.1, CCC paragraph 5.147, page H31**

NGET does not consider that the establishment of a DCO secured Employment and Skills Fund is appropriate, necessary or proportionate in the context of the Project.

CCC disagrees and has provided appropriate justification for the Employment and Skills Fund within its Local Impact Report (REP1-153) and will provide further comments once it has considered NGET's response.

CCC notes that the provision of a DCO Employment and Skills Fund has been secured within other NSIP's including the Longfield Solar Farm NSIP (EN010118).

**Draft DCO - Table H1.1, CCC paragraph 5.176, page H38**

NGET maintain that 28-day decision making timescales with provision for "such other period" to be agreed are appropriate, and potential to agree extension of period for discharge of requirements.

This fails to avoid the very issue CCC are concerned with: repeated requests for time extensions and insufficient certainty that requests for extensions of time will be granted.

The nature of the 28-day decision making deadline is that it contains insufficient time to:

- Register the application
- Consult, receive and consider consultation responses
- Request additional information as appropriate

- Give sufficient time for the applicant to respond to information requests
- Receive, process and reconsult amended information as necessary
- Consider consultation responses,
- Prepare report
- Issue decision notice

From CCC's experience as a Discharging Authority on the Longfield Solar Farm NSIP (EN010118), the current NSIP Requirement discharging process, is weak in addressing the complexities of discharging complex, high-level, technical requirements.

## **Other Matters**

### **Inter Relationships with other Projects (REP-134)**

In relation to Longfield Solar Farm (EN010118), paragraph 3.2.21 notes the proposed creation of a new access from Terling Hall Road to access a UKPN overhead line. Whilst this matter is deferred to Braintree District Council, CCC consider that NGET should liaise directly with Longfield Solar Farm Ltd regarding access arrangements to ensure the Development Consent Order (DCO) is not compromised.

### **Response to Errata List (REP-071)**

CCC has reviewed the updated materials and has no substantive comments to make. CCC reserves the right to comment should any further changes arise.

CCC thanks the Examining Authority for opportunity to provide commentary at this Procedural Deadline 2.

If you have any queries, please contact me.

Yours sincerely,



Ruth Mabbutt MRTPI  
Senior Planning Officer  
Chelmsford City Council NSIP Lead