

Basildon Council

ExQ1: 20 March 2026 Responses due by deadline 3: 10 April 2026

Interested Party Reference number: [REDACTED]

ExQ1	Question to:	Question:	Response:
GEN General and cross-topic questions			
GEN 1.3	All local authorities in particular: Norfolk CC Essex CC Colchester CC Tendring DC Basildon BC Thurrock Council Parish councils: Swainsthorpe Newton Flotman Hintlesham and Chattisham Copdock and Washbrook	National and local planning policy compliance tracker Since the policy compliance document submitted with the application [APP-086] was produced (1 April 2025) a number of local and national planning policies have been updated or newly issued. This includes the energy suite of National Policy Statements (NPS) EN-1, EN-3 and EN-5 (Updated National Policy Statements). The transition provisions set out in section 1.6 of NPS EN-1 (December 2025) apply to the application as it was accepted prior to publication of the revised policy. The updated NPS are capable of being important and relevant considerations in the decision-making process. The applicant submitted a policy compliance tracker [REP1-133] at deadline 1. It includes an assessment of the updated NPS alongside those which are designated, and a number of new insertions including the consultation draft National Planning Policy Framework (NPPF), local plan policies and neighbourhood plan policies. The listed relevant planning authorities and Parish Councils (PC) who have a newly adopted or emerging local plan and neighbourhood plan are invited to confirm that the policy compliance tracker is an accurate representation of their newly designated and/ or emerging policies and provide any additional comments relating to the applicant's regard to those	ECC refers to the relevant district authorities to comment on the content of the compliance tracker where this relates to newly designated and/or emerging policies. The ECC LIR (REP1-161) contains details of relevant county policies and the policy compliance tracker accurately reflects their current status. The Compliance Tracker submitted by the Applicant at Deadline 1 refers to the Regulation 18.3, which is the latest document consulted upon at the time of writing. Since Deadline 1, Basildon has proceeded to develop the Regulation 19 draft of the Local

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		<p>policies. All relevant planning authorities are invited to make comment on the content of the compliance tracker. If you have already dealt with changes to policy in your local impact report (LIR) there is no need to provide a response.</p>	<p>Plan. In this draft, the labels are the same.</p> <p>Aside from general minor text amends, the main relevant text changes for the emerging Local Plan Draft are as below:</p> <p>Following consultation, the revised Regulation 19 text for Policy NE1: Conserving and Enhancing the Natural Environment has additional text including the requirement on <u>urban and brownfield sites for development proposals to apply the Urban Greening Factor (UGF) to quantify and secure high-quality greening measures that deliver biodiversity net gain, climate resilience, and health benefits. Proposals are also encouraged to use Natural England's Environmental Benefits from Nature Tool to assess and demonstrate the wider environmental and social benefits of nature-based solutions.</u></p>
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			It also adds requirement for the delivery of suitable Alternative Natural Greenspace (SANG)
GEN 1.24	The applicant BTSurveyors (for LIH Dunton Hills Limited) Essex CC Basildon BC Brentwood BC	Dunton Hills Garden Village 2 The RRs and LIRs from Essex CC [RR-1083] and [REP1-161], Basildon BC [RR-0335] and Brentwood BC [RR-0391] and [REP1-150] make detailed comments regarding potential effects on the viability and delivery of the DHGV allocation which may be affected by the OHL infrastructure. Existing pylon infrastructure is in place on and around DHGV. Work no. 33 includes the replacement of part of an existing overhead distribution electric line. The works include removal of 1.9 kilometre (km) of existing pylons and OHLs (route PSC) and the installation of 1.6km of new underground distribution electric line, with a temporary diversion of the existing line. These works are shown on works plans section G (sheet 6 of 6) [APP-023] and section H (sheet 1 of 7) [APP-024]. However the submissions include limited consideration of the existing OHL which crosses the allocation, and the proposals by the applicant to remove and underground part of the existing electric lines. a) The applicant and BTSurveyors (for LIH Dunton Hills Limited) are asked to clarify whether the other existing OHLs which runs westwards across the DHGV allocated site would remain in place or be undergrounded or diverted. b) The local authorities and BTSurveyors (for LIH Dunton Hills Limited) are asked to provide specific comment on Work no. 33, and clarify whether both existing OHLs were included in their assessment of viability of the DHGV proposals. c) The local authorities are asked to respond to the applicant's comments (response to RRs [REP2-023] and response to LIRs [REP2-030]). In particular regarding the ability to co-exist, the routing of the proposed OHL within a high pressure gas pipeline safety zone, the	Basildon understands that there is no agreement in place for the removal of the existing overhead electricity lines that cross the site. The development of the Garden Village at Dunton Hill assumes the existing UKPN OHL are to be removed by a third party. This position is reflected in the developable area and the viability assessment underpinning the delivery of the affordable housing and associated infrastructure where no money is allocated to undertake this work. It is also noted that paragraph 22 of LIH Relevant Representation (RR-0421) states "The scheme has been devised on the assumption that the existing 132kV overhead electricity lines will be removed from the centre of the site and diverted underground elsewhere".

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		<p>restrictions placed by existing development, and that the suggested alternative (an underground cable) would lead to direct loss of part of the DHGV development area. d) The local authorities are asked to provide a response to the applicant's commentary on the Savills Report and theoretical effects on gross development value as set out in paragraph 3.8.47 to 3.8.57 of the applicant's response to LIRs [REP2-030]. e) The local authorities and BTSurveyors for LIH Dunton Hills Limited are also asked to clarify updated timescales for a planning decision to be issued relating to application 21/01525/OUT, for reserved matters applications to be submitted, and for expected commencement (and phasing) of the DHGV development, so that the ExA is able to make a more informed review of cumulative construction effects.</p>	<p>Basildon acknowledges the complexity of route selection especially given the presence of heritage assets in the vicinity of Dunton Hall. However, significant concerns were raised about DHGV from the very start of this process when responding to the first Non Statutory Consultation in 2022. The amendments to the Norwich to Tilbury scheme which we as the local authorities are seeking, are considered to be relatively minor and while the logic of following the safety zone for the high pressure gas main can be understood, it does not address the fundamental environmental concerns raised in respect of safeguarding the principles and objectives of the DHGV. In maintaining its preference for this route, the Applicant refers to the proposed route being the least-worst options in terms of its environmental effects.</p> <p>Basildon, along with Brentwood and ECC believe these changes</p>
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			<p>do not respect the design objectives for the garden village (or the wider development aspirations identified in current and emerging local plans. The Applicant in its defence of the route selection to the east of DHGV does not raise any technical objections to the undergrounding of the electricity cable and its alignment in the same corridor as the high-pressure gas main.</p> <p>There is no objection in principle to these underground services running in close proximity subject to the appropriate safeguards being introduced. It would be expected that this would have been explored in greater detail by the Applicant. Reference is made to Holford Rule 7 as the rationale for selecting the route to the east of DHGV. For the reasons set out in ECC's LIR, we also agree with ECC and do not concur with the Applicant's justification. However, a hierarchy of potential mitigation should have been explored.</p>
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			<p>Holford Rule 7 states that “When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development” and goes on to state in supplementary guidance that in addition to adopting appropriate routing, [the proposer] evaluate where appropriate the use of alternative tower designs now available where these would be advantageous visually, and where the extra cost can be justified” . While acknowledging the comments on alternative pylon design and in particular T Pylons (APP-122 - Design Development Report), greater weight should have been given to the designation of this development as a garden village and the wider design and environmental considerations that would offset the additional costs referred to. As stated at Para 2.5.9 of the Design Development Report (APP-122), the latest independent report on the Comparison of Electricity Transmission</p>
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			Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that T-pylons provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take. The counter argument of the Applicant is noted but this would deliver appropriate environmental benefits while also having the benefit of avoiding any impact on the developable area for DHGV.
GEN 1.25	The applicant BTSurveyors (for LIH Dunton Hills Limited) Essex CC Basildon BC Brentwood BC	Dunton Hills Garden Village 3 Clarify the location of the play area to the south eastern corner of DHGV site (as shown on in appendix 8 [RR-0421] and provide comment as to whether it is feasible for this area to be designed around or relocated within the proposed development when detailed plans are submitted.	The location of the play area was specified in the approved land use parameter plan considered by Brentwood's Planning Committee when resolving to grant outline planning permission. It therefore forms part of the decision. The play areas are distributed across the development such that they are within easy walking distances for the community. Whilst there may be scope to refine the location at RM stage, this should not undermine the overall play strategy, design or placemaking

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			for the development, which forms part of the garden village design objectives.
LUS Land use and soils, green infrastructure			
LUS 1.12	Chelmsford CC Brentwood BC Basildon BC Thurrock Council	Green Belt - 3 Comment on the applicant's position with regard to lines and pylons being not inappropriate development in the Green Belt and whether you disagree with the proposition and why.	<p>We disagree with this proposition.</p> <p>The National Planning Policy Framework (NPPF) and Essex GI Strategy stress the importance of quality and function, not just quantity of green infrastructure. The presence of lines and pylons as proposed by the Applicant in the Green Belt by definition inhibits this.</p> <p>We welcome the provision by the Applicant as requested by GEN 1.23 of the provision of the "clear plan of a suitable scale which overlays the proposed development with the allocations and the DHGV approved masterplan (or outline plan), as well as other constraints including the existing gas pipeline and the Build Protect Design corridor.". We believe that this will illustrate the degree of impact that will be caused.</p>

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			<p>Holford Rule 7 states that “When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development” this has been quoted elsewhere in answer to GEN 1.24, evidence being sought of a hierarchy of mitigation approach. This approach appears to be at odds with the Applicant’s position.</p>
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