



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

**Chelmsford City Council Host Authority reference [REDACTED]**

**Closing Statement**

**July 2026**

**Introduction**

1. Chelmsford City Council has set out its position relating to the Project within its Local Impact Report (REP1-153), Final Statement of Common Ground and other responses including responses to relevant representations REP2-035, Examining Authority Questions One, ExQ1 REP3-075, Issue Specific Hearing Two, ISH2 REP4-326 and Examining Authority Questions Two ExQ2 REP5-236.

**Principle of Development**

2. In closing, the principle of the development and the acceptability of the onshore route comprise the key Local Issue for Chelmsford City Council (CCC).

3. CCC maintains its objection to the Norwich to Tilbury pylon Project. The objection is based on the following grounds:

I. The preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons.

II. CCC recognises that this option would need to be delivered at pace and without risk to national net zero, renewable energy and decarbonisation targets, and energy security.

III. CCC consider that the presence of overhead lines and approximately 40m - 50m high pylons would be visually harmful and would result in unnecessary harm to heritage, landscape, ecology and residential amenity across the Chelmsford City Council administrative area.

4. CCC is supportive of well-developed, well-designed, and coordinated Projects that enable the goal of Net Zero and the interim targets, as set out in the revised National Policy Statements (NPS's). CCC consider this cannot occur at the expense of Chelmsford's natural and historic environment, landscapes and communities that would be affected by the Project.

5. CCC recognise the timing for the Project is driven by the need for capacity in the transmission system by 2030. Yet it is CCC's view that such benefit should not and cannot be secured at the expense of Chelmsford's local communities, landscapes and environments that would be affected by the Project.

6. CCC remains concerned that the Project would introduce vast incongruous features of industrial character into a rural landscape, which would harmfully impact upon the landscape and historic environment. The pylons and overhead lines would be visually noticeable and prominent. Many of the effects cannot be mitigated against due to the height and scale of the Project and would be permanent.

## **Green Belt**

7. CCC consider that the Project, as inappropriate development, would by definition be harmful to the Green Belt. It would result in encroachment and moderate harm to the openness of the Green Belt in both visual and spatial terms. The very special circumstances put forward by NGET are noted, but CCC's view is that these do not outweigh the harm that the proposal would have upon the Green Belt.

## **Great Waltham and Little Waltham**

8. There is a planning hotspot between Great Waltham and Little Waltham. The Project would irreversibly destroy the unique and significant historic environment within Great Waltham and Little Waltham. Whilst some of the harm identified is at the low level,

cumulatively there would be an extensive impact. The proposed mitigation proposed does not adequately limit the harm on the historic environment, the sensitive landscape, ecology and residents that reside within it. CCC object to the Project due to lack of sufficient mitigation and appropriate compensation.

9. CCC acknowledge that the Project has been amended to introduce full height pylons within Great Waltham from TB140 southwards. Lower height pylons would remain east of the Grade I Langleys house and Registered Park and Garden. Whilst this amendment reduces the impact on the non-designated Windmill House, other significant impacts remain.

10. CCC remain concerned regarding the proposed loss to trees and woodland within Great Waltham and Little Waltham. In spite of repeated requests, a draft Arboricultural Method Statement has not been produced and it is unclear what protections exist to protect retained trees. CCC consider that direct and indirect impacts that would lead to damage or loss of ancient woodland habitat or veteran trees must be avoided as there is no appropriate mitigation for the loss of irreplaceable habitats.

11. Within the Waltham Gap, CCC remains concerned that the siting of pylons close to residential properties would have a harmful and unacceptable impact upon the occupant's amenities, both visually and spatially, where the pylons would have an overbearing and dominant impact upon the properties, particularly at properties sited less than 200 metres from the Project.

12. CCC remains concerned that the hours and days of working, which include Sundays and Bank Holidays, offer no respite from noise for residents and are thus harmful to their wellbeing. The hours of working are not accepted by CCC. CCC is concerned that the siting of the Project, in close proximity to residents sited within and adjacent to the Waltham Gap, would be unacceptable in amenity terms.

## Heritage

13. Chelmsford has a rich and diverse historic environment, which would irreversibly harmed by the proposals.

14. The concerns relating to the impacts upon designated and non-designated heritage assets, with additional impacts identified by CCC remain unaddressed.

15. The greatest impacts are at the section of route between Little Waltham and Great Waltham, near to Langleys and its Registered Park and Garden, where the harm to the Great Waltham and Little Waltham Conservation Areas is underestimated, resulting in moderate effects, which are significant.

16. Little Waltham and Great Waltham are both picturesque villages with high-quality vernacular historic buildings set within rural landscapes. The development order comes to within c.55m and c.40m of their Conservation Areas respectively. The National Grid assessment acknowledges permanent harm to their settings' but provides limited mitigation measures. Impacts are also identified to many listed buildings within the setting which should be considered cumulatively. These impacts form part of an area of high heritage sensitivity, along with the grade I Langleys and other designated and non-designated heritage.

17. There are other areas with permanent significant impacts identified by National Grid at:

- Balls Farm, Great Waltham (grade II)
- Langleys Registered Park and Garden (grade II)
- Southwoods Farm, Writtle (3 x grade II)
- Margaretting Hall (grade II)
- Church of St Mary, Stock (grade II\*)
- White's Tyrrells Farmhouse, Stock (grade II)

18. The council's assessment finds additional significant harm to the significance of a further 6 grade II listed buildings, 1 grade I listed building, two Conservation Areas, two protected lanes and a designed landscape.

19. Non-designated built heritage, WWII defences and non-designated design landscapes are not adequately represented in the evidence base. The NG assessment does not adequately take account of the local heritage features. There would be notable significant moderate impacts on the non-designated landscape at Copt Hall, the WWII GHQ defence line at Great Waltham and the Protected Lanes at Paulk Hall and Goodmans Lanes.

20. No additional mitigation or landscaping is proposed as part of the scheme, but are essential. It is nonsensical that landscape mitigation is not possible for any part of the route.

21. The Project would lead to construction impacts that would involve the considerable removal of trees, hedgerows and planting. Their removal would have a noticeable impact upon setting. Maintenance and operation corridors involve considerable removal trees, hedgerows and vegetation permanently. Replacement mitigation would take many years to mature to a level where the pre-existing conditions would be reinstated.

22. Overall, the proposed development would introduce vast incongruous features of industrial character into a rural landscape. The additional harm identified, together with the other acknowledged harms mean that there would be a considerable impact on the historic environment which should be fully considered and are matters of great weight and importance. The mitigation proposed is wholly inadequate.

23. Appropriate investigation, recording and mitigation measures need to be provided in respect of archaeology.

## **Landscape**

24. CCC's position regarding landscape, has been set out in full within its submission. The Project would introduce predominantly 50 metre high lattice pylons and associated infrastructure into an undeveloped, rural landscape where intervisibility can be quite high due to the large-scale flat or gently undulating landscapes or where the scale of the pylons and overhead wires means the effect is an industrialisation of the countryside.

25. As previously stated, the Project would lead to a harmful change in the identified character and appearance of the landscape, which would lead to a change in the character and quality of the landscape. It would lead to harmful visual intrusion, through the siting of

high large-scale industrialised features that cannot be fully mitigated against. The Project would lead to the harmful loss of the character and beauty of the countryside.

26. CCC retains its view that the Project would have a significant negative landscape impact. There would be a significant negative impact upon landscape character that would extend over a wide area, reducing scenic beauty and tranquillity, aesthetic enjoyment, a sense of place, history and identity, and inspiration for learning throughout the landscape and visual study area.

27. Visually, the Project would have a significant negative visual impact over the length of the Project. As a result of open landscapes, multiple pylons in view and cumulative effects when passing from one visual receptor area to another along the line, it is considered the cumulative effect is likely to result in an overall significant adverse effect generally within the study area at both construction and operation.

28. CCC maintain its position that the DCO should not be granted without a substantial funded landscape and visual compensation scheme. This to recognise the long-term significant residual negative and un-mitigatable operational effects on both landscape and visual receptors.

29. CCC has been working with National Grid energy Transmission (NGET) regarding the provision of replacement planting, which would be provided on a 3:1 basis of trees to be removed within the Order Limits. Yet the specific detailing of this planting will not be agreed until requirement stage. This makes it extremely challenging to ascertain whether the replacement tree planting would be acceptable and whether it would be sited in the appropriate location.

30. Overall, it is considered that the proposed replacement / reinstatement planting and provision of BNG compensates for the proposed harm to the landscape.

### Construction hours

31. Extensive discussions have taken place regarding working hours, which raise concern due to their extended nature which propose working on Sundays and bank holidays. Whilst acknowledging the rolling 12 day working week of the construction workforce, and NGET's concerns regarding the impact upon its programme, CCC fundamentally objects to the days of working, which offer lack of respite from noise for residents.

### Skills and Employment

32. CCC welcomes the provision of a skills and employment plan. Harmful socio-economic and recreational impacts of the Project must be avoided, including the cumulative impacts of construction.

33. CCC remains concerned regarding the impact of the construction upon local businesses, and has identified areas surrounding Margaretting and Writtle, whose communities experience a high number of events including national events hosted at Hylands House.

34. Concerns remain regarding the proposed siting of an access route through Anglia Ruskin University at Writtle College. An alternative access should be provided in consultation with ARU Writtle. CCC is of the view that the Project should not unacceptably affect the day-to-day function and operation of the College.

## Highways

35. CCC defers to Essex County Council Highway Authority regarding highways impacts. More widely, CCC remains concerned that the construction of the Project would have an unacceptable and harmful impact upon the local communities that the Project would sit.

## Cumulative Impacts

36. Cumulatively the Project would lead to extensive effects, particularly with regard to noise and construction. It is crucial that residents get regular breaks, and the proposed development is well managed, controlled and integrated within existing permitted development schemes. Reasonable hours of work and good construction traffic management are one of the key measures to reduce impact.

## Community benefits and compensation

37. Whilst some attempt has been undertaken with regard to replacement tree planting, skills and employment and BNG, this does not overcome CCC's fundamental concern in principle regarding the lack of appropriate compensation and acceptable mitigation.

38. CCC consider that reasonable compensation and benefits should be provided, particular with regard to environmental and landscape enhancement and funding for heritage. Although separate to planning, affected residents should be appropriately compensated.

39. Whilst the Project would deliver significant benefits at a national level, CCC consider that this benefit would not offset the harm at the local level and local communities should be compensated appropriately.

40. Overall, the Project would introduce vast incongruous features of industrial character into a rural landscape, which would have harmfully impact upon the landscape, historic environment and amenities of the communities within which they would sit. The pylons and overhead lines would be visually noticeable and prominent. Many of the effects cannot be mitigated against due to the height and scale of the Project and would be permanent.

## Development Consent Order

41. Should the Development Consent Order, CCC retains its concerns regarding the deliverability of Requirements. In particular, CCC remains concerned regarding the proposed 25 day timeframe for discharging requirements and the proposed construction hours.

## Conclusion

42. In conclusion, CCC request that the Examining Authority give substantial weight to CCC's contributions including its Local Impact Report when assessing the planning balance.