

Norwich to Tilbury Development Consent Order

Brentwood Borough Council – Closing Statement

Brentwood Borough Council acknowledges the extensive engagement that has been undertaken with National Grid as the Applicant throughout the pre-application process as well as during Examination. The Council also welcomes the progress achieved and that has been reflected in the signed Statement of Common Ground, where agreement has been reached across a substantial number of technical matters including noise and vibration, air quality, health and wellbeing, ecology and historic environment.

However, notwithstanding that progress, several matters remain unresolved that are important to the Council and that continue to underpin its objection to the Proposal.

Strategic Alternatives

The Council's primary concern remains that from the outset the Applicant has failed to demonstrate that credible alternatives have been fully and properly assessed before advancing the predominantly overhead line solution.

Whilst Brentwood Borough Council recognises the strategic importance of electricity transmission reinforcement and the need to facilitate the transition to net zero, it remains concerned that coordinated offshore solutions and HVDC undergrounding alternatives have not been subject to a sufficient level of comparative appraisal, which in turn could have presented a viable and less environmentally and economically damaging alternative to this proposal. The Council therefore considers that the application has been brought forward without a robust demonstration that the chosen solution represents the least harmful means of meeting the identified need.

Landscape and Visual Impact

Landscape and visual effects remain one of the Council's most significant areas of concern, particularly in combination with the heritage concerns set out below. The Council maintains its position that:

- The assessment does not fully capture the extent of the visual and landscape harm that would arise.
- Viewpoints around Ingatestone Hall and the surrounding historic landscape do not adequately represent likely effects.
- Embedded, standard and additional mitigation measures remain insufficient.
- Significant adverse operational landscape impacts remain unresolved.
- Adequate compensation proposals have not yet been demonstrated.

With specific regard to these effects, the Council remains particularly concerned about:

- Impacts on Haverings Grove;
- Impacts on the Ingatestone Hall area;
- The general loss of rural character;
- Tree and hedgerow losses; and
- The long-term visual effects of substantial new overhead line infrastructure across Brentwood's landscape.

Heritage

Whilst many heritage assessment matters have been able to be agreed, the Council nevertheless continues to highlight particular sensitivity in the area surrounding Ingatestone Hall and the broader composition of associated listed buildings at this location.

The Council remains concerned that the value of the combined heritage, landscape and visual effects in this location have not been fully recognised or addressed and continues to encourage the Applicant to explore further design solutions and suitable mitigation. The Council has signalled to the Applicant that it will continue to engage with them to help address this.

Strategic Growth and Dunton Hills Garden Village

The Council remains concerned about the interaction between the proposed overhead line route and Dunton Hills Garden Village.

Whilst the Applicant maintains its position that the development will not affect housing numbers viability or delivery, the Council nevertheless considers that the Proposal has the potential to undermine the overarching Garden Community principles, place-making objectives and design aspirations that form a fundamental part of the approved vision for this strategically important growth location. Discussions remain ongoing regarding planting, mitigation and compensation measures for the affected part of the site and the Council will continue to engage with National Grid and Essex County Council to secure appropriate solutions to these concerns.

Biodiversity Net Gain

Whilst the Council welcomes the Applicant's commitment to deliver at least 10% Biodiversity Net Gain, significant concerns remain regarding delivery and monitoring, in particular:

- that the proposed five-year aftercare period for replacement planting is considered inadequate;
- that insufficient certainty exists regarding the location and benefits of off-site BNG provision;
- there is a lack of clarity regarding how Brentwood communities and habitats will benefit from off-site delivery; and
- that further confidence is required that long-term monitoring and management arrangements will be secured.

Cumulative Effects

The Council continues to remain unconvinced that cumulative impacts have been properly considered, fully assessed or adequately mitigated, having particular concern regarding the interaction of the Proposal with:

- Dunton Hills Garden Village;
- the Lower Thames Crossing; and
- Brentwood Enterprise Park.

The Council recognises that all of these Projects *may* be carried out at non-intersecting schedules, but there is no *certainty* around this matter and therefore the Council considers that further confidence is required regarding phasing, traffic management, community impacts and enforceable mitigation measures.

Development Consent Order

Whilst considerable progress has been made with the draft DCO, several important areas were not able to be resolved or agreed, including:

- Biodiversity Net Gain delivery mechanisms;
- discharge and notification periods;
- hedgerow protections; and
- detailed drafting relating to implementation and oversight of requirements.

Summary

Brentwood Borough Council has consistently acknowledged the national importance of reinforcing the electricity transmission network and recognises the constructive engagement undertaken throughout pre-Application and Examination.

However, the Council remains concerned that the Applicant has not demonstrated that reasonable alternatives have been adequately considered and continues to object to the significant landscape, visual and potential strategic growth impacts arising from the proposed overhead line route. The Council is also not satisfied that sufficient certainty has been provided regarding Biodiversity Net Gain delivery, long-term planting establishment, cumulative effects, compensation measures and aspects of the draft Development Consent Order.

For these reasons, Brentwood Borough Council respectfully requests that substantial weight is given to these outstanding concerns when the Examining Authority reaches its recommendation to the Secretary of State.