



Norwich to Tilbury Powerline Project

Targeted Consultation 25th February 2025 – 27th March 2025

Response from Chelmsford City Council

1. OVERALL SUMMARY RESPONSE

- 1.1. Whilst the need for clean energy transmission is understood, Chelmsford City Council (CCC) maintains an objection in principle to the use of onshore pylons and power lines.
 - 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 30 - 50m high pylons would be visually harmful and would result in unnecessary harm to heritage, landscape, ecology and residential amenity across the Chelmsford area.
- 1.2. CCC are aware that National Grid (NG) may undertake further changes to the proposal without consultation. CCC consider that as a minimum, the Host Authorities and other relevant stakeholders should be consulted on any further changes to the proposal that fall outside of the scope of the Targeted and Statutory consultations. This is so that CCC can assess whether any changes are acceptable in principle in planning terms, and to enable the consideration of alternative options / the development of mitigation as necessary prior to the submission of the Development Consent Order (DCO).
- 1.3. Following the publication of the Community Funds for Transmission Infrastructure (March 2025) by the Department of Energy Security and Net Zero, it is expected that the proposal provides community funding in accordance with the guidance and that this is funded separately to the delivery fund.
- 1.4. Notwithstanding the overall objection in principle, CCC provides the following comments on the proposed Targeted Consultation.
- 1.5. In Consultation Area 7 (Great Leighs)

- The pylon route would raise heritage implications and mitigation measures should be provided.
- The proposal would represent increased and harmful pressures on woodlands, trees, hedgerows and Local Wildlife Site(s) and sufficient mitigations and buffers would need to be provided. Where harm is unavoidable arboricultural compensatory measures should be delivered to offset harm.
- A review should be undertaken of the alternative alignment to assess Public Health impacts.
- Details of the proposed changes to visual effects have not been described and need to be provided to enable the visual effects of the alignment to be assessed.
- Ecological survey information should be provided to understand the significance of the ecological impacts of the of the proposed change.

1.6. In Consultation Area 8 (Great Waltham and Little Waltham)

- The proposal would harmfully impact upon the setting of the Grade I listed Langleys, Langleys Grade II Registered Park and Garden and would lead to significant adverse impacts on Great Waltham and Little Waltham Conservation Areas, together with other designated and non-designated heritage assets.
- CCC's preferred option is that alternative mitigation in the form of underground cabling should be used for this section.
- Alternatively, different alignment should be chosen with further consideration being given to relocating the route to the north of Great Waltham and Little Waltham.
- Finally, upon exhausting the above options, regard should be given to the introduction of T pylons along this part of the route.
- There is insufficient information to demonstrate that the proposal would be beneficial in historic environment terms and that the identified harm created by the introduction of lower height pylons would outweigh the identified harm proposed by standard 50 metre height pylons.
- The impact of proposing full or lower height pylons has not been adequately assessed to come to a view on the impact on the historic environment. An in-depth review and balancing exercise needs to be undertaken and the two options needs to be appropriately weighted.
- Further review of the type, spacing and nature of the pylons is required. Where harm is unavoidable, mitigation and heritage compensatory measures including funding should be delivered.
- The proposal would represent increased and harmful pressures on woodlands, trees, hedgerows and Local Wildlife Site(s) and sufficient mitigations and buffers would need to be provided. Where harm is unavoidable arboricultural compensatory measures should be delivered to offset harm. Pylons TB139 and TB140 would be sited close to

the Conservation Area this could lead to unacceptable and irreversible harm to protected trees if these were removed

- An in-depth review should be undertaken of the alignment to assess Public Health impacts. Impacts would be particularly noticeable at Windmill House where the siting of pylon TB141 would be directly visible and noticeable from the property and in views along Chelmsford Road. The review should inform a relocated pylon location that balances the impacts upon the amenities of the occupants of Windmill House, against the visual and heritage impact of the proposal.
- Ecological survey data should be provided in respect of the repositioning of pylons TB135 to TB142 (previously TB133 to TB140) to ensure that repositioning avoids veteran trees and protected species including bat roosts.
- There is insufficient information to demonstrate that the proposal would be beneficial in landscape and visual terms and that the identified harm created by the introduction of lower height pylons; would outweigh the identified harm proposed by standard 50 metre height pylons.
- The impact of proposing full or lower height pylons has not been adequately assessed to come to a view on the impact on the landscape and visual environment. An in-depth review and balancing exercise needs to be undertaken and the two options needs to be appropriately weighted.

1.7. In Consultation Area 9 (Margaretting)

- The pylon route would raise heritage implications and mitigation measures should be provided.
- The proposal would represent increased and harmful pressures on woodlands, trees, hedgerows and Local Wildlife Site(s) and sufficient mitigations and buffers would need to be provided. Where harm is unavoidable arboricultural compensatory measures should be delivered to offset harm.
- A full construction management plan and air quality impact assessment would need to be submitted as part of the Environmental Statement to ensure that the amenities of neighbouring residents are protected throughout the construction period.
- The Highway Authorities wider concerns relating to the effects of construction upon nearby Three Mile Hill should be considered.

2. CONTEXT

2.1. This consultation follows a Statutory Consultation which was held by National Grid between 10th April 2024 to 26th July 2024.

2.2. The City Councils representations to that consultation stated:

“Whilst the need for clean energy transmission is understood, Chelmsford City Council (CCC) maintains an objection in principle to the use of onshore pylons and power lines. This objection is because insufficient evidence has been provided to show that the lines are

needed by 2030 and that the accelerated programme of consultation has taken the project outside of the scope for Holistic Network Design (HND) as part of the Offshore Transmission Network Review (OTNR). 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.

Notwithstanding the overall objection in principle, CCC provides comments on the proposed alignment and raises concerns over the harmful landscape impacts, potential for harm to residential amenity and in particular the harm to designated heritage assets along the route.

There is significant concern regarding the impacts on designated and non-designated heritage assets at Little Waltham and Great Waltham, where the route passes between the two historic villages.

There is also significant concern that the archaeological remains of an Iron Age and later settlement at Ash Tree Corner at Little Waltham extends beyond the designated scheduled monument area. This area, extending into the order limits, may be of national significance and therefore further work is needed to determine the extent of the archaeology.

Insufficient effort has been provided to mitigate the impact of the Project (particularly on heritage assets) and insufficient information has been provided to be able to properly assess the likely impacts of the Project and mitigation proposed.”

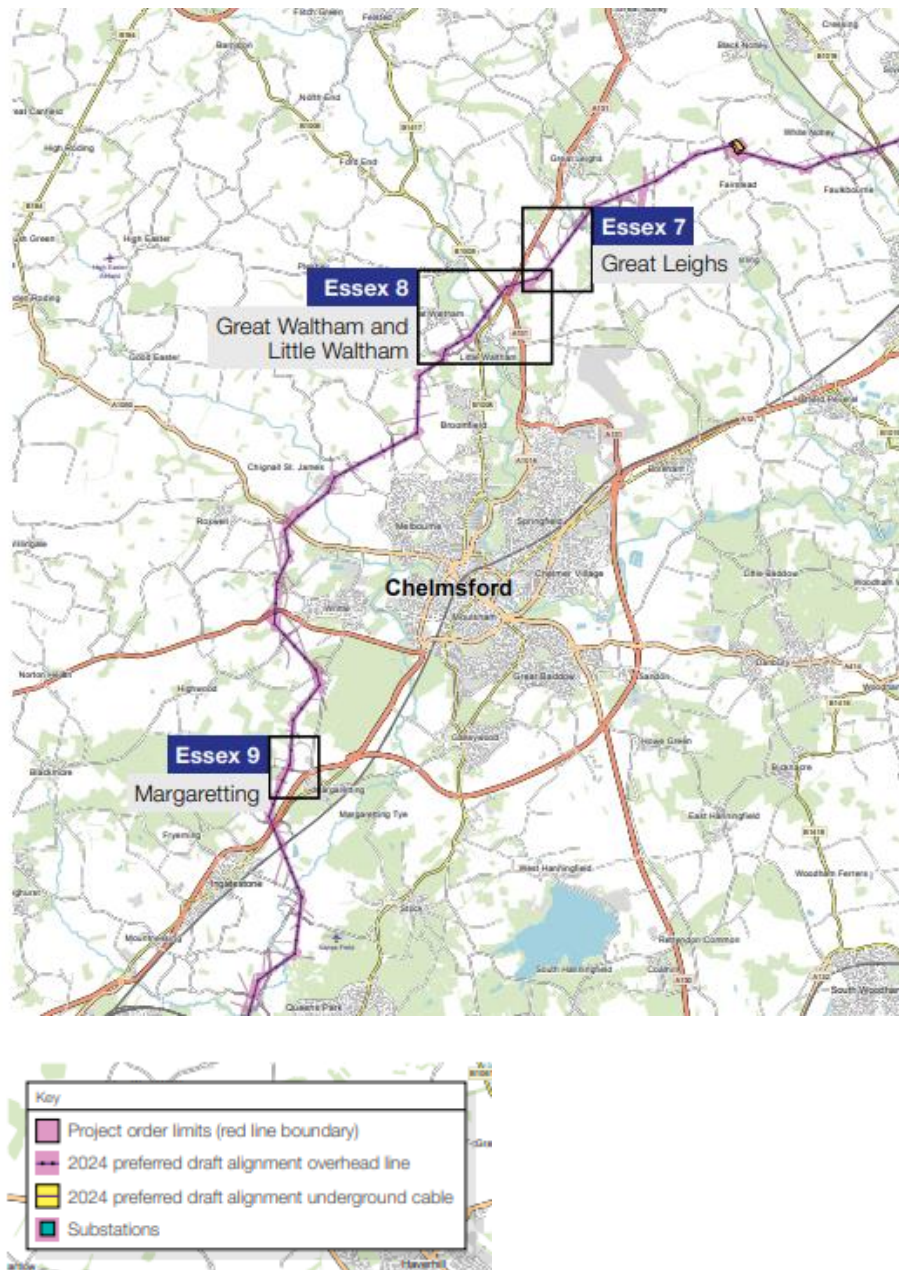
- 2.3. Prior to the Statutory Consultation, two previous non-statutory consultations, were held by National Grid Electricity Transmission Ltd (NG) between 21 April 2022 -16 June 2022 and 27 June 2023 - 21 August 2023. Following consideration by the CCC Policy Board, detailed responses were submitted to NG outlining strong objections in principle to the Project for an overhead powerline scheme. The second consultation response raised serious concerns about the heritage and landscape impact of the proposed powerline alignment and design. It was CCC's position that this had not been fully assessed and the draft preferred alignment was premature.

- 2.4. This consultation is based on the following consultation documents:

- Norwich to Tilbury Targeted Consultation Strategy
- Targeted Consultation Map
- Essex 7 Consultation Leaflet
- Essex 7 Environmental Implications of Change
- Essex 8 Consultation Leaflet
- Essex 8 Environmental Implications of Change
- Annex A Visualisations – Langleys
- Annex A Visualisations – Walthams
- Annex A Visualisations – Langleys Park Great Waltham
- Annex A Visualisations – Little Waltham
- Essex 9 Consultation Leaflet
- Essex 9 Environmental Implications of Change

- 2.5. The changes proposed in Essex and Thurrock affect 15 areas. Three areas, Essex 7, Essex 8 and Essex 9 affect parishes within Chelmsford.

Figure one: Screenshot of Targeted Consultation Map affecting Chelmsford Parishes



Source: National Grid

3. NATIONAL PLANNING POLICY CONTEXT

3.1. The proposal is to be assessed against relevant National Planning Policy Statements (NPS)

- National Policy Statement for energy EN-1
- National Policy Statement for electricity networks infrastructure EN-5

3.2. The National Planning Policy Framework (NPPF) and the Chelmsford Local Plan will also be material considerations to the Development Consent Order (DCO) application.

- 3.3. Other documents include the Community Funds for Transmission Infrastructure: Guidance March 2025.

4. PRINCIPLE OF PROPOSAL AND ONSHORE ROUTE

- 4.1. CCC declared a Climate and Ecological Emergency in 2019. CCC supports the transition towards a low or zero carbon economy to address the impact of climate change and improve sustainability. This includes renewable energy production where this can be appropriately located and suitably mitigated.
- 4.2. CCC recognises the rapidly growing need for electricity as the climate emergency requires us to help support the replacement of fossil fuels such as oil and gas as soon as possible. However, this does not mean that all proposals which may assist in reducing climate change should be approved at any cost.
- 4.3. The City Council maintains its objection in principle on the Norwich to Tilbury project.
- 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 30 - 50m high pylons would be visually harmful and would result in unnecessary harm to heritage, landscape, ecology and residential amenity across the Chelmsford area.
- 4.4. Within the last set of consultation documents, NG provided information on strategic options testing with the inclusion of a Strategic Options Backcheck and Review Document (June 2023) and Design Development Report (June 2023). Both documents have been updated but remain materially unchanged from the 2023 iteration and continue to conclude that the current overhead line onshore proposal must be progressed.
- 4.5. An independent report, known as the Hiorns Report (The East Anglia Transmission Network Reinforcement Report by Hiorns Smart Energy Networks (2023)) was commissioned jointly by Essex, Suffolk and Norfolk County Council's. The report reviewed the need and timing for additional capacity out of the East Anglia region and considered the need against a range of credible generation scenarios to assess the robustness of the need case.
- 4.6. The Hiorns Report concluded there was a need for the electricity transmission capacity provided by Norwich to Tilbury by 2030 based on the contracted generation position and 2035 based on uncontracted work; meaning that National Grid could delay progressing the proposal, which was then understood to be uncontracted, for at least five years.
- 4.7. A further report was undertaken by the Electricity System Operator (ESO). Known as the East Anglia Network Study (March 2024). The report independently assessed the different ways the electricity being generated could be transported once it has landed, to where it is needed. The report concluded that overhead line was the best economic outcome in terms of costs if capacity needed to be delivered by 2030 but considered there were a multitude

of other grid reinforcement options to achieve the same capacity, with potentially with less significant environmental impacts than the Norwich to Tilbury proposals. including the use of underground HVDC (High Voltage Direct Current) option as well as hybrid onshore and offshore options.

- 4.8. Since the publication of CCC's Statutory Consultation response, there has been a shift by National Government to deliver at least 95% of Great Britain's energy generation from clean sources by 2030.
- 4.9. The National Energy System Operator (NESO) has provided the Government with guidance on the energy infrastructure required to deliver Clean Power by 2030 where the Governments ambition, set out in in the Clean Power 2030 Action Plan (December 2024) is to achieve 43-50 GW of electricity from offshore wind, 27-29 GW of electricity from onshore wind, and 45-47 GW of electricity from solar power. The report concludes that 80 network and enabling infrastructure projects will be required.
- 4.10. While Norwich to Tilbury is not specifically listed as one of these 80 network and enabling infrastructure projects, it is listed as a key project under the Clean Power 2030 report prepared by the NESO. The NESO report highlights the importance of Norwich to Tilbury and other proposals to be delivered by 2030 to transmit clean power from East Anglia. While the NESO Clean Power report is only guidance, the need for Norwich to Tilbury was reaffirmed by the Hiorns report (dated September 2023) which independently reviewed the need for network reinforcement in East Anglia.
- 4.11. Due to the above and National Grid's own Strategic Options Backcheck and Review (April 2024), it is acknowledged that the grid capacity offered by the Norwich to Tilbury project is needed.
- 4.12. Yet, in accordance with the ESO's East Anglia Network Study, there are a multitude of other grid reinforcement options to achieve the same capacity, with potentially with less significant environmental impacts than the Norwich to Tilbury proposals.
- 4.13. As such, CCC wishes to reiterate that its 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.
- 4.14. CCC considers that credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure across Chelmsford and Essex should be explored fully.
- 4.15. CCC recognises that this option would need to be delivered in a timely manner, and without risk to national net zero, renewable energy generation and decarbonisation targets and energy security.
- 4.16. Although not mentioned specifically in this consultation, CCC are aware that National Grid may undertake further changes to the proposal without consultation. CCC considers that the realignment pylons along the route could lead to localised harm to heritage, landscape, ecology and residential amenity.
- 4.17. CCC regret this decision and consider that as a minimum, the Host Authorities and other relevant stakeholders should be consulted on any further changes to the proposal that

fall outside of the scope of the Targeted and Statutory consultations prior to submission of the Development Consent Order (DCO).

- 4.18. The reason for this is so CCC can assess whether any changes are acceptable in principle in planning terms, and to enable the consideration of alternative options / the development of mitigation as necessary.
- 4.19. Following the publication of the Community Funds for Transmission Infrastructure (March 2025) by the Department of Energy Security and Net Zero, which applies to projects that have not yet commenced construction, it is expected that the proposal provides community funding in accordance with the guidance and that this is funded separately to the delivery fund.
- 4.20. It is understood that the community funds outlined within the above guidance document are separate from and not a material consideration for planning authorities, yet it is expected that National Grid will have regard to this guidance and will explain how they intend to respond to it as part of their supporting information to the DCO application. It is already commonplace for other large-scale infrastructure to deliver community funds.

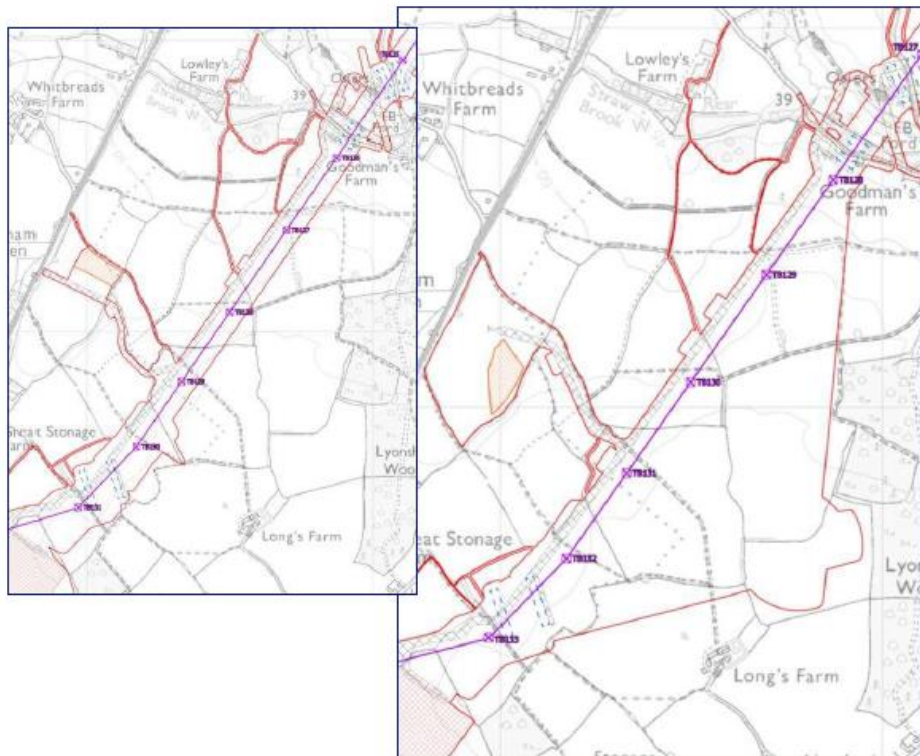
5. CONSIDERATION OF TARGETED CONSULTATION CHANGES

- 5.1. The changes proposed in Essex and Thurrock affect 15 areas.
- 5.2. Three areas, Essex 7 (Great Leighs), Essex 8 (Great Waltham and Little Waltham) and Essex 9 (Margaretting) affect Chelmsford parishes and summarised as follows:
- Extension of the project order limits south of Great Leighs between proposed pylons TB128 and TB133 and minor amendments including the repositioning of a temporary construction laydown area.
 - Amendment to route alignment and reposition pylons between TB135 – TB142 (previously presented as TB133 to TB140) between Great Waltham and Little Waltham.
 - Amendment to the pylon design between the use of 'lower height pylons' for seven locations (TB136 to TB142) between Great Waltham and Little Waltham.
 - Minor amendments to the Order limits within Great Waltham and Little Waltham.
 - Relocation of a temporary construction laydown area from a site close to Ivy Barns Lane Margaretting to a new location approximately 50 metres northwest of the location proposed in the Statutory consultation and other minor amendments.
- 5.3. In addition to the consideration below, Chelmsford City Council defer to Essex County Council (ECC) Place Services and Highway Authority in respect of comments from their technical specialists.
- 5.4. These comments relate to the following specialisms:
- Landscape and Visual Impact
 - Archaeology
 - Highways
 - Ecology
- 5.5. The comments are provided within the Appendix to this document.

5.6. Chelmsford City Council asks that National Grid have regard to the comments of other statutory stakeholders including, and not limited to, Natural England, Environment Agency, the Local Lead Flood Authority and Historic England.

Essex 7 Great Leighs

5.7. National Grid seek to extend the Order Limits south of Great Leighs between pylons TB128 and TB133. An illustration of these changes is shown below:



5.8. The changes would extend the 'red line' of the application boundary (Order Limits) to encompass a wider area.

5.9. The reason for this change is because Essex County Council has recently consulted on its Draft Replacement Minerals Plan. This has identified that the land within the proposed route alignment could be allocated as a minerals extraction site. The extension of the Order Limits to the southeast of the proposed alignment would allow for an alternative pylon route to be accommodated with the Order Limits if the site was allocated in the Minerals Plan.

5.10. Other minor amendments include repositioning the temporary construction laydown area.

5.11. The consultation to the Minerals Local Plan closed in July 2024. CCC currently has insufficient information to come to an informed view of the suitability of the changes to the Draft Minerals Plan in respect of the pylon route and Great Leighs.

5.12. If the site is allocated for minerals extraction, CCC is extremely concerned that details of an alternative pylon alignment have not been provided for consideration as part of this Targeted Consultation.

CCC Considerations

Heritage

- 5.13. The pylon route would be a massive intrusion of industrial scale features, which would impact considerably on the historic environment. Longs Farmhouse lies to the east of the route in this location. The farmhouse dates from the sixteenth-seventeenth century and is Grade II listed. There are the remains of a moat and a group of historic outbuildings, including a curtilage listed barn. The site has an isolated rural setting, which makes an important contribution to its significance.
- 5.14. Within the Statutory Consultation, the Order Limit was proposed approximately 330m away from Longs Farm and approximately 450m from the central alignment of the corridor.
- 5.15. The revised Order Limit would come within approximately 120m of Longs Farm. CCC agree with the supporting assessment which identifies potential significant impacts on the setting of Longs Farmhouse. This is due to the close proximity of Longs Farm and the open rural landscape setting. The impacts could be further amplified by the removal of hedgerows for construction access or for minerals extraction.
- 5.16. National Grid should make every effort to ensure the final proposals give the maximum possible breathing space to Longs Farmhouse to limit the impact as much as possible.
- 5.17. Mitigation measures should be provided. These should include the include the reinstatement of hedgerows and new tree planting to mitigate against the construction impacts of the development. Mitigation should ensure that land take is sufficient to allow for the range of mitigation options. Where harm is unavoidable heritage compensatory measures should also be delivered including repair of listed buildings and/or associated built and landscape features to offset harm to setting.

Trees

- 5.18. The proposed changes would represent increased and harmful pressures on woodlands, trees and hedgerows.
- 5.19. The proposal would extend through priority habitat deciduous woodland 867, with pylons TB127 and TB128 sited near to TPO/2008/046 which is located just to the north of Goodmans Farm.
- 5.20. Pylons TB129 – TB132 would be sited near to ancient woodland contained within Lyons Hall Wood Local Wildlife Site (LoWS), which is sited immediately to the east of the proposed revised Order Limit.
- 5.21. Although a matter for ECC, the suggestion of using the area as an allocated mineral extraction site, if not properly protected, would unacceptably harm the ancient woodland and Lyons Hall Wood Local Wildlife Site (LoWs) as this could lead to loss of irreplaceable ecological habitat.

- 5.22. Irrespective of the harm caused by minerals extraction, any rerouting of the pylon alignment could lead to unacceptable and irreversible harm to protected trees and ancient woodland if these were removed to facilitate an alternative pylon route.
- 5.23. The effect and impact of the proposed rerouting on the protected trees, ancient woodlands, hedgerows and Local Wildlife Sites identified above has not been adequately assessed. National Grid should make every effort to ensure the proposed route alignment is sited as far away from these affected features to limit the impact of the proposal as much as possible.
- 5.24. Sufficient mitigations and buffers would need to be provided. These would need to demonstrate that works including heavy construction causing compaction, runoff, airborne particles harming plant health and hydrology and noise disturbance impacting wildlife, can be undertaken without harm to the sensitive woodland nor lead to the irreversible effect of loss of habitat.
- 5.25. Where harm is unavoidable arboricultural compensatory measures should be delivered to offset harm.

Amenity

- 5.26. At this point in time, CCC has insufficient information to be able to come to an informed view on the acceptability of the proposed route alignment. Further details of the proposed route should be provided to enable a full assessment to be undertaken.
- 5.27. As part of the alignment could be sited closer to residential properties located at Goodmans Farm, Longs Farm and Great Stonage Farm, it is suggested that there could reasonably be an increased risk of Public Health impacts to the localised community including examples of stress and anxiety of Electromagnetic Field (EMF) concerns, increased noise.
- 5.28. The Preliminary Environmental Assessment Report (PEIR) has advised that embedded mitigation measures designed to avoid/reduce significant effects include the sensitive routing and siting. In accordance with the Holford Rules, the proposed rerouting of pylons and wires should be sited to avoid affecting the general amenities of the above properties as part of this mitigation.

Other Considerations

Landscape and Visual Impact

- 5.29. Place Services Landscape have compared the Targeted Consultation against the Statutory Consultation. The Environmental Implications of Change Report concludes that:
- “In terms of landscape, effects on landscape character are likely to be similar” and that “There would be no change to the significance of landscape and visual effects”.*
- 5.30. Place Services broadly agree that effects on landscape would be similar to those at previous consultation.

- 5.31. Place Services note that details of the proposed changes to visual effects have not been described and no update on visual effects has been included as part of the Environmental Implications of Change Report. Details of the visual effects of the proposal need to be provided to enable the visual effects to be assessed.

Archaeology

- 5.32. Place Services Archaeology state that the changes have not identified archaeological impacts. Based on the Historic Environment Record they consider that the proposals would have a similar impact to the original proposals and have no specific comments.

Highways

- 5.33. ECC Highway Authority raise no objection in principle to the proposed changes in Great Leighs do raise but wider concerns relating to the principle of development which CCC ask NG to note.

Ecology

- 5.34. Place Services Ecology state that the extension of the Order Limits would allow for flexibility if the location were to be allocated in the Minerals Plan.

- 5.35. The Environmental Implications of Change report states that:

“The proposed alignment change would cross an additional two mature tree / hedge lines. The proposed change would be closer to Lyonshall Wood Local Wildlife Site which is also ancient woodland.

Although closer to a Local Wildlife Site and two additional tree / hedge lines being crossed, there would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”

- 5.36. Place Services state that the potential for works to be closer to the Lyonshall Wood Local Wildlife Site (LoWS) (ancient woodland) is notable, though it is reasonable to anticipate that mitigation (buffering) could/would be employed to avoid direct impacts to the Lyonshall Wood LoWS.

- 5.37. Examination of the original TB126 to TB131 route using Google Earth showed the route intersecting hedgerows at relatively benign (treeless) locations. The proposed expansion of the Order Limits to the southeast opens the potential for impacts to a different set of hedgerows with trees that are more closely connected to the LoWS. These hedgerows appear to have far fewer (if any) options for lower impact crossing points.

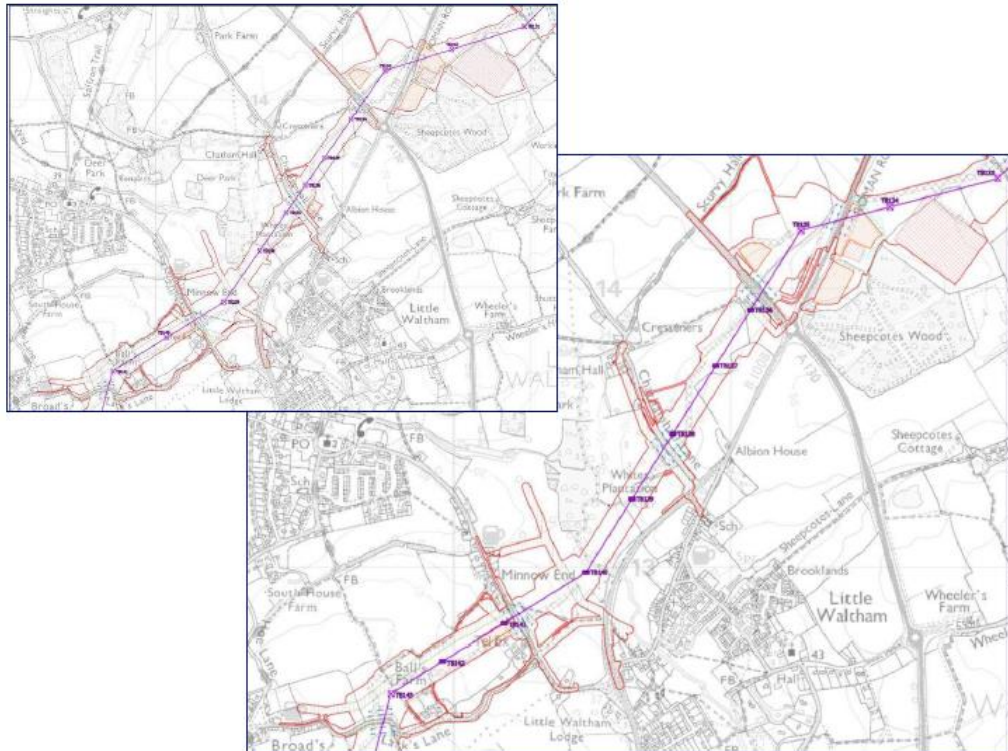
- 5.38. Without any ecological survey information, Place Services state that they are prohibited from reaching a fully informed conclusion on the significance of the proposed change with regard to potential ecological impacts.

- 5.39. Place Services consider that the realignment of the route further southeast appears to have greater potential for impacts to Priority Habitat hedgerows, veteran trees, bat roost trees, badger setts, and hazel dormice. Place Services expect that appropriate survey data

has been collected to allow an informed impact assessment of the possible expansion of the Order Limits to the southeast.

Essex 8 Great Waltham and Little Waltham

- 5.40. The proposal seeks to change the alignment of the pylons between Great Waltham and Little Waltham. They also propose to change the pylon design from full height lattice pylons to lower height lattice pylons within seven locations. An illustration of the changes is shown below.



- 5.41. CCC understand that the proposal would reposition pylons between TB135 – TB142 (previously presented as TB133 to TB140) as part of the amended route alignment and ‘lower height pylons’ would be used for seven locations (TB136 to TB142).

- 5.42. Other proposals include minor amendments to the Order Limits.

CCC Considerations

Heritage

- 5.43. The pylon route would be a massive intrusion of industrial scale features, which would impact considerably on the historic environment. It is particularly disappointing that the route still proposes to traverse the sensitive area between the villages of Great Waltham and Little Waltham.
- 5.44. As outlined within CCC’s statutory consultation response, the most sensitive area on the route is between the villages of Great Waltham and Little Waltham, where the route

passes between two Conservation Areas close to Langleys Grade II Registered Park and Garden (and within the setting of the Grade I listed house Langleys), the Ash Tree Corner Scheduled Ancient Monument, the Church of St Mary and St Lawrence (Grade I) and 65 Grade II listed and 2 Grade II* buildings within 1km, also numerous non designated heritage assets including pillboxes associated with the GHQ defence line and various vernacular buildings. Most of these heritage assets have a rural setting which contributes to their significance.

- 5.45. As noted previously, there are areas where heritage impacts are not fully assessed, where the impacts are downplayed and where the evidence base is not comprehensive. It is essential that there is a full assessment of the historic environment to inform the proposals.
- 5.46. The assessment work undertaken in the Preliminary Environmental Impact Report (PEIR) identifies permanent significant impacts on the setting of the Grade I listed Langleys, Langleys Grade II Registered Park and Garden and Great Waltham and Little Waltham Conservation Area's.
- 5.47. This is the only location on the entire 184km route where permanent significant impacts are identified affecting any Conservation Area or Registered Parks and Gardens.
- 5.48. Langleys has an isolated rural setting, which makes an important contribution to its significance and the introduction of pylons within the setting of the house and garden would irreversibly destroy the unique and irreplaceable historic environment.
- 5.49. The assessment of views submitted as part of the Targeted Consultation from the immediate rear of Langleys indicates that the realignment and reduced height of the pylons would reduce the visual impact of the proposal. In principle, the reduced intrusion into views from the immediate rear of Langleys are welcomed, but the proposal would still lead to significant adverse heritage impacts which are not adequately mitigated.
- 5.50. Whilst the lower height pylons limit their visibility above trees when seen in the context of tree belts, they have a similar or greater visual presence in exposed locations due to their wider stance and thicker structural sections. Although there would be some minor reduction in the impacts on Langleys, there remains a significant level of adverse harm to the key heritage assets within this area.
- 5.51. Cumulatively, the proposal would lead to significant adverse impacts on Great Waltham and Little Waltham Conservation Areas, together with other designated and non-designated heritage assets. The revised scheme brings TB142 closer to Balls Farm, amplifying the harmful impacts. TB141 would be prominent in views west along Chelmsford Road out of Great Waltham Conservation Area.
- 5.52. It would also impact upon a number of non-designated heritage assets within the vicinity of the route. Little Waltham and Great Waltham are both picturesque villages with high quality vernacular historic buildings set within rural landscapes. Non-significant impacts are also identified to many listed buildings within the setting which should be considered cumulatively as they form part of an area of high heritage sensitivity, along with Langleys.

5.53. Mitigation generally should ensure that land take is sufficient to allow for a range of mitigation options, including landscaping from closing up gaps in hedges to large scale woodland planting where necessary.

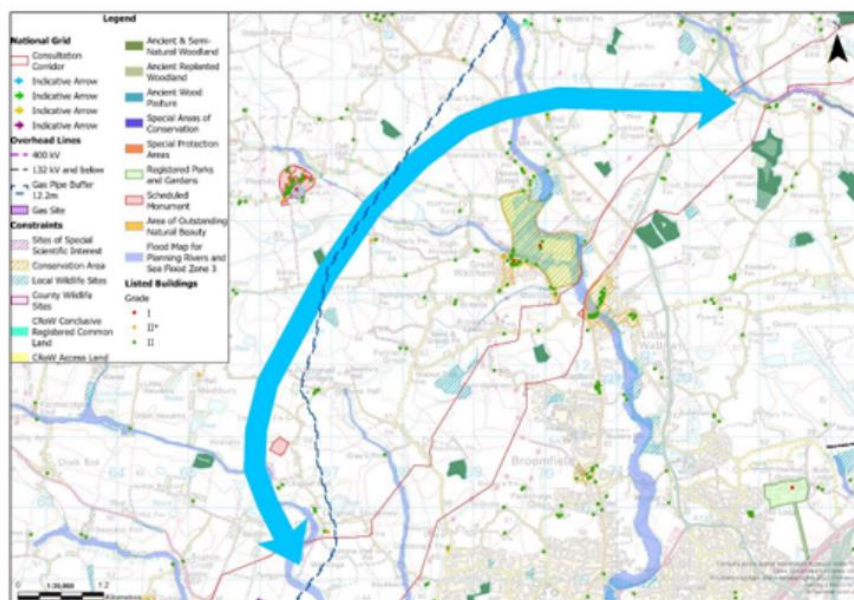
5.54. Yet, the mitigation proposed is not considered to adequately limit the harm on the historic environment. Whilst it is acknowledged there are existing mature tree belts which would give some screening in summer, the impact would still be considerable; especially during the autumn and winter when the foliage has died back. It is essential that adequate mitigation is provided.

5.55. Where harm is unavoidable heritage compensatory measures should be delivered. For instance, repair of listed buildings and/or associated built and landscape features to offset harm to setting. This would be essential at Langleys; where there are a number of structures and features within the Registered Park and Garden, as well as the outbuildings and the house. The proposal could offset harm to setting by providing funded repairs.

5.56. In relation to Great and Little Waltham, CCC presents the following three options in respect of the route alignment.

- I) CCC's preferred option is that alternative mitigation in the form of underground cabling should be used for this section.
- II) Alternatively, different alignment should be chosen with further consideration being given to relocating the route to the north of Great Waltham and Little Waltham. Details of this route can be found at page 58, figure 5.13, Indicative alternative route of the Norwich to Tilbury Design Development Report June 2023 as illustrated below:

Figure 5.13 Indicative alternative route – Great Waltham



- III) Finally, upon exhausting the above options, regard should be given to the introduction of T pylons along this part of the route. These have a visually different character and appearance that may contribute to a mitigation strategy to limit the landscape and

heritage issues listed above. A full impact assessment of the use of T pylons should be undertaken to determine the suitability of this proposal.

- 5.57. Currently there is insufficient information contained within the Targeted Consultation to demonstrate to the satisfaction of CCC that the proposal would be beneficial in historic environment terms and that the identified harm created by the introduction of lower height pylons; that would be more visually oppressive and noticeably visually wider and squat within their setting, would outweigh the identified harm proposed by standard 50 metre height pylons.
- 5.58. The matter needs to be considered further as part of an in-depth review undertaken in consultation with a number of interested parties including Historic England to enable a balancing exercise to be undertaken and the two options to be appropriately weighted. At present, the impact of proposing full or lower height pylons has not been adequately assessed to come to a view on the impact on the historic environment.
- 5.59. Additionally, further review of the type, spacing and nature of the pylons in this location should be given by National Grid in consultation with CCC and other interested parties.

Trees

- 5.60. The proposal would represent increased and harmful pressures on woodlands, trees and hedgerows.
- 5.61. There are three trees sited in close proximity to the proposed changes. These comprise part of TPO/2005/060 and are sited between pylons TB140 and TB141.
- 5.62. 139 trees are also sited close to or within the Order Limits. These encompass Langleys Deer Park Local Wildlife Site, Great Waltham Conservation Area and a priority habitat deciduous woodland 707.
- 5.63. The change of alignment to increase the distance between the Conservation Area and veteran trees is welcomed. However, the reduction in the height of the pylons to 30 metres would increase the amount of vegetation required for clearance.
- 5.64. As pylons TB139 and TB140 would be sited close to the Conservation Area this could lead to unacceptable and irreversible harm to protected trees in the event of these being removed to facilitate the lower height pylons. This is not accepted.
- 5.65. The effect and impact of the proposal on the protected trees, ancient woodland and Local Wildlife Site identified above has not been adequately assessed. National Grid should make every effort to ensure the proposed pylons and amended route alignment are sited as far away from these affected features to limit the impact of the proposal as much as possible.
- 5.66. The protection of ecological features and mitigation for any impacts would be necessary and precautionary mitigation measures would need to be undertaken to ensure there is no harm to any protected or notable species.

- 5.67. Sufficient mitigations and buffers would need to be provided. These would need to demonstrate that works including heavy construction causing compaction, runoff, airborne particles harming plant health and hydrology and noise disturbance impacting wildlife, can be undertaken without harm to the sensitive woodland nor lead to the irreversible effect of loss of habitat.
- 5.68. Where harm is unavoidable arboricultural compensatory measures should also be delivered, to offset harm.

Amenity

- 5.69. Pylons would be sited close residential properties located at Red House, Larks Lodge, Little Bakers, the properties collectively sited at Minnow End, Balls Farm, Chatham Hall Bungalow and Albion House.
- 5.70. In particular, pylon TB141 would be sited immediately south of Windmill House, adjacent to Chelmsford Road.
- 5.71. Due to the proximity of the pylons to the above properties, it is suggested that there could be reasonably be an increased risk of Public Health impacts to the localised community including examples of stress and anxiety of Electromagnetic Field (EMF) concerns, increased noise.
- 5.72. This would be particularly noticeable in the case of Windmill House where the siting of pylon TB141 would be directly visible and noticeable from the property; which contains windows within its southern elevation which would face towards the proposed pylon.
- 5.73. Pylon TB141 would also be sited adjacent to Chelmsford Road where it would be visible from the nearby footpath PROW 222_76 and within passing views by highway users. The proposals would lead to a change in outlook, that due to their height, cannot be screened by trees or other mitigation.
- 5.74. The Preliminary Environmental Assessment Report (PEIR) has advised that embedded mitigation measures designed to avoid/reduce significant effects include the sensitive routing and siting of pylons. In accordance with the Holford Rules, the proposed rerouting of pylons and wires should be sited to avoid affecting the general amenities of the above properties as part of this mitigation.
- 5.75. In order to mitigate against effects on quality of life, pylon TB141 should be repositioned towards the west of the site into the field as far as possible on the grounds of avoiding impact upon general amenity.
- 5.76. Although this would mean that the pylon would be visible when viewed from the property, the impact on Windmill House should be investigated further, with an in-depth review taken to inform a relocated pylon location that balances the impacts upon the amenities of the occupants of Windmill House, against the visual and heritage impact of the proposal.

Other Considerations

Landscape and Visual Impact

- 5.77. The 'Environmental Implications of Change' report acknowledges that the proposal would lead to changes to the alignment route by *"moving the alignment further away from Chatham Hall Bungalow but closer to Albion House". The proposal would also alter some pylon locations, most notably bringing a pylon into closer proximity to Windmill House on Chelmsford Road.*
- 5.78. Regarding visual amenity impacts, Place Services Landscape agree with the conclusions presented in the Environmental Implications of Change report that the proposed revisions potentially result in similar impact or *"slightly greater due to the heavier and wider nature of the low height structures"*.
- 5.79. While lower height pylons are generally considered favourable in terms of long distant visual impact, the power lines are presented in a denser cluster, resulting in potentially greater impact from the lines in addition to the proposed heavier structured pylons.
- 5.80. The lower height pylons would lower the height of the lines within the skyline which would increase the sense of enclosure and impact on openness of a flat, open landscape and the perceived tranquillity of the area.
- 5.81. The repositioning would result in some pylons being located closer to receptors including closely residential properties at Albion House and Windmill House (also both considered to be non-designated heritage assets). Pylon TB141 would also be sited adjacent to Chelmsford Road where it would be visible from the nearby footpath PROW 222_76 and within passing views by road users. The proposals will lead to a change in outlook, that due to their height, cannot be mitigated by standard practices such as planting as the pylons would extend above the tree line.
- 5.82. The visual impacts of the lower height pylons are considered greater than the previous proposals for 50 metre height pylons. Essentially, the potential reduction in effects for long distance views has resulted in an increased impact on closer views.
- 5.83. Regarding landscape character, the repositioning of three pylons would allow for the retention of mature vegetation which contributes towards the character of the area. As stated in Place Services response to the Statutory Consultation, while views of the pylons would likely be filtered, the introduction of pylons would likely degrade the setting of the Grade I Listed 'Langleys' House as detailed the Heritage comments above.
- 5.84. Place Services go onto raise concerns regarding the heritage impacts of the proposal on landscape character with regard to the impact of the setting of Grade II 'Langleys' Registered Park and Garden and both Great Waltham and Little Waltham Conservation Areas; where valued landscape features contribute greatly with riparian landscape associated with the River Chelmer. Langleys Park is specifically mentioned as a landscape feature in the Essex Landscape Character Assessment 2002 identified within LCA 'Chelmer Valley' (C5).
- 5.85. Place Services Landscape conclude that although the proposal would not likely alter these previously judged effects on landscape character, and it is generally agreed that with the findings within the 'Environmental Implications of Change' that stated that *'...overall, there would be no change to the type or significance of landscape and visual effects as a*

result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”, the proposal would still lead to significant permanent negative effects on landscape character.

- 5.86. Currently there is insufficient information contained within the Targeted Consultation to demonstrate to the satisfaction of CCC that the proposal would be beneficial in landscape and visual terms and that the identified harm created by the introduction of lower height pylons; that would be more visually oppressive and noticeably visually wider and squat within their setting, would outweigh the identified harm proposed by standard 50 metre height pylons.
- 5.87. The matter needs to be considered further as part of an in-depth review undertaken in consultation with a number of interested parties including Historic England to enable a balancing exercise to be undertaken and the two options to be appropriately weighted. At present, the impact of proposing full or lower height pylons has not been adequately assessed to come to a view on the impact of the proposal in landscape character and visual amenity terms.

Archaeology

- 5.88. Place Services Archaeology state that the changes have not identified archaeological impacts. Based on the Historic Environment Record they consider that the proposals would have a similar impact to the original proposals and have no specific comments.

Highways

- 5.89. ECC Highway Authority raise no objection in principle to the proposed changes. Chelmsford City Council note the Highway Authorities wider concerns relating to the principle of development and ask that these are considered.

Ecology

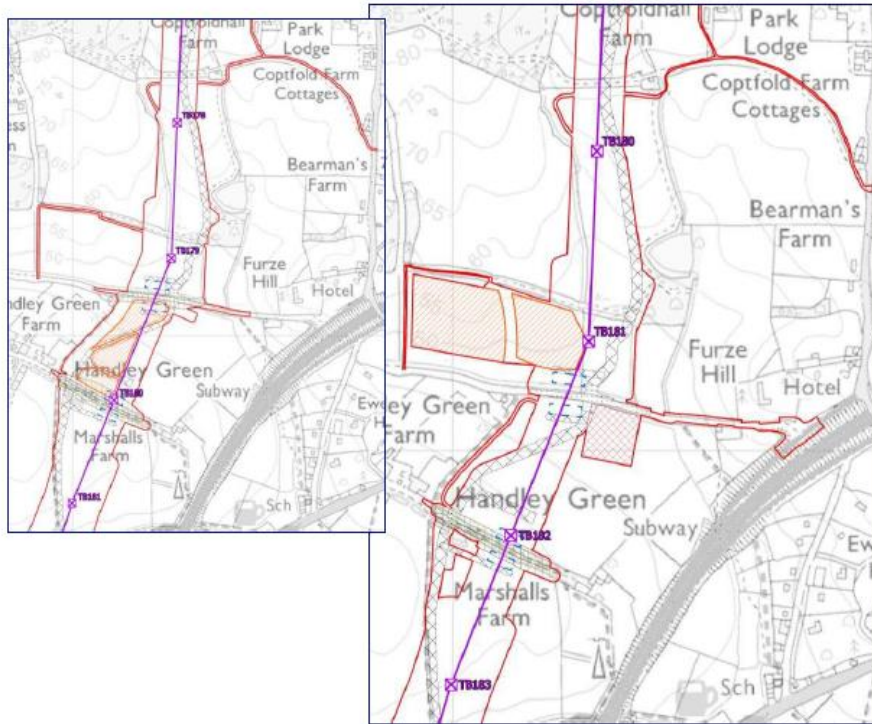
- 5.90. Place Services Ecology refer to the Environmental Implications of Change report which states:

“The proposed change would move the alignment further away from Langley’s Deer Park Local Wildlife Site. In addition, greater vegetation clearance would be needed for the proposed low height towers. However, with appropriate mitigation, there would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”

- 5.91. Place Services state that they would welcome the repositioning of pylons TB135 to TB142 (previously TB133 to TB140) if that repositioning avoids veteran trees and protected species including bat roosts. However, they state that they do not have access to survey data to confirm this.

Essex 9 Margareting

- 5.92. National Grid are proposing to move a temporary construction laydown area from a site close to Ivy Barns Lane to a new location approximately 50 metres northwest of the location.
- 5.93. An illustration of these changes is shown below.



- 5.94. The proposed constructed laydown compound, highways compound and highway mitigation works have been amended to include additional land adjacent to Ivy Barns Lane.

CCC Considerations

Heritage

- 5.95. The pylon route would be a massive intrusion of industrial scale features, which would impact considerably on the historic environment.
- 5.96. As noted in CCC's statutory consultation response, the land at Coptfold Hall has a designed landscaped originating from the eighteenth and nineteenth centuries, including woodlands, gardens and historic buildings. It is included on the Essex Gardens Trust Register of Designed Landscapes and should be considered as a non-designated heritage asset.
- 5.97. The proposed route passes directly through the landscape and at present its heritage value is not acknowledged; the revised proposals place the compounds within and adjacent to the non-designated landscape.
- 5.98. At this point in time, CCC has insufficient information to be able to come to an informed view on the acceptability of the proposal. It is unclear how harmful the resited compound will be in heritage terms as the impact on Coptfold Hall has not been assessed.

The site should be assessed, the heritage impacts considered and mitigated as part of the historic environment assessment.

- 5.99. Part of Ivy Barns Lane is a protected lane and there are a number of non-designated heritage assets in the vicinity of the amended scheme. It is essential the historic environment baseline includes these features and the impacts are full assessed, considered and mitigated.
- 5.100. The assessment does not adequately take account of the local heritage features, as outlined above. The scheme also underestimates the impacts on many heritage assets.
- 5.101. National Grid should make every effort to ensure the final proposals give the maximum possible breathing space to Coptfold Hall and Ivy Barns Lane to limit the impact as much as possible.
- 5.102. Mitigation measures should be provided. These should include the include the reinstatement of hedgerows and new tree planting to mitigate against the construction impacts of the development. Mitigation should ensure that land take is sufficient to allow for the range of mitigation options. Where harm is unavoidable heritage compensatory measures should also be delivered including repair of listed buildings and/or associated built and landscape features to offset harm to setting.

Trees

- 5.103. The proposal would represent increased and harmful pressures on woodlands, trees and hedgerows.
- 5.104. The repositioning of the construction laydown would be near to James's Spring Local Wildlife Site and ancient woodland. The extended road would be near Furze Hill close to TPO/2000/044 and the northwestern aspect near to Writtle Park Wood.
- 5.105. The effect and impact of the proposal on the protected trees, ancient woodland and Local Wildlife Site identified above has not been adequately assessed. National Grid should make every effort to ensure the proposed pylons and amended route alignment are sited as far away from these affected features to limit the impact of the proposal as much as possible.
- 5.106. The protection of ecological features and mitigation for any impacts would be necessary and precautionary mitigation measures would need to be undertaken to ensure there is no harm to any protected or notable species.
- 5.107. Sufficient mitigations and buffers would need to be provided. These would need to demonstrate that works including heavy construction causing compaction, runoff, airborne particles harming plant health and hydrology and noise disturbance impacting wildlife, can be undertaken without harm to the sensitive woodland nor lead to the irreversible effect of loss of habitat.
- 5.108. As the construction laydown area would be near to James's Spring Local Wildlife Site and ancient woodland, the construction compound and construction laydown area would need to be sited a minimum of 15 metres away from the ancient woodland and a minimum buffer of 15 m must be in place throughout the development period.

- 5.109. Where harm is unavoidable arboricultural compensatory measures should also be delivered, to offset harm.
- 5.110. The previous concerns regarding the siting of the proposal near to the northwestern aspect close to ancient woodland Writtle Park Wood, have not been addressed. These noted that the buffer is adjacent to several ancient woodlands (Irreplaceable Habitat). Notably, Writtle Park Wood which could be indirectly impacted (e.g. changes to hydrology). Appropriate measures will need to be taken to protect these ancient woodlands.

Amenity

- 5.111. CCC suggests that there could be reasonably be an increased risk of Public Health impacts to the localised community including examples of stress and anxiety of Electromagnetic Field (EMF) concerns, increased noise and vibration from construction.
- 5.112. A full construction management plan would need to be submitted as part of the Environmental Statement to ensure that the amenities of neighbouring residents are protected throughout the construction period. In addition, the air quality impact assessment sets out that it will be necessary for the applicant to develop and implement a dust management plan for the construction related activities.

Other Considerations

Landscape and Visual Impact

- 5.113. Place Services Landscape broadly agree with the 'Environmental Implications of Change' report which states that:

"The proposed change would move the proposed laydown areas further from property at Handley Green, reducing visual effects during construction, but closer to properties at Ivy Barn."

Archaeology

- 5.114. Place Services Archaeology state that the conclusions drawn in Environmental Implications of Change – Essex 9 are agreed. These state that there would be no change to the type or significance of the archaeological effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.

Highways

- 5.115. ECC Highway Authority raise no objection in principle to the proposed changes. Chelmsford City Council note the Highway Authorities wider concerns relating to the principle of development and the effect of construction traffic on nearby Three Mile Hill and ask that these are considered as part of this consultation.

Ecology

- 5.116. Place Services Ecology refer to the Environmental Implications of Change report which states:

“The northwest corner of the proposed change would be in close proximity to an ancient woodland block which is also a local wildlife site (James’ Spring Local Wildlife Site). The proposed laydown area also would be in close proximity to a mature band of trees to the north. However, there would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.”

5.117. Place Services expect that mitigation (buffering) would be employed to avoid impacts to the James’s Spring Local Wildlife Site and appropriate mitigation would be enacted for any works required to the line of mature trees along the access track to the laydown area (e.g. limb reduction).

5.118. Provided mitigation is provided, they agree with the Environmental Implications of Change statement.

6. CONCLUSIONS

Principle of Development

6.1 Whilst the need for clean energy transmission is understood, Chelmsford City Council (CCC) maintains an objection in principle to the use of onshore pylons and power lines.

- 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 30 - 50m high pylons would be visually harmful and would result in unnecessary harm to heritage, landscape, ecology and residential amenity across the Chelmsford area.

6.2 CCC are aware that National Grid (NG) may undertake further changes to the proposal without consultation. CCC consider that as a minimum, the Host Authorities and other relevant stakeholders should be consulted on any further changes to the proposal that fall outside of the scope of the Targeted and Statutory consultations. This is so that CCC can assess whether any changes are acceptable in principle in planning terms, and to enable the consideration of alternative options / the development of mitigation as necessary prior to the submission of the Development Consent Order (DCO).

6.3 Following the publication of the Community Funds for Transmission Infrastructure (March 2025) by the Department of Energy Security and Net Zero, it is expected that the proposal provides community funding in accordance with the guidance and that this is funded separately to the delivery fund.

Great Leighs

6.4 In Consultation Area 7 (Great Leighs):

- The pylon route would raise heritage implications and mitigation measures should be provided.
- The proposal would represent increased and harmful pressures on woodlands, trees, hedgerows and Local Wildlife Site(s) and sufficient mitigations and buffers would need to be provided. Where harm is unavoidable arboricultural compensatory measures should be delivered to offset harm.
- A review should be undertaken of the alternative alignment to assess Public Health impacts.
- Details of the proposed changes to visual effects have not been described and need to be provided to enable the visual effects of the alignment to be assessed.
- Ecological survey information should be provided to understand the significance of the ecological impacts of the of the proposed change.

Great and Little Waltham

6.5 In consultation area 8 (Great Waltham and Little Waltham):

- The proposal would harmfully impact upon the setting of the Grade I listed Langleys, Langleys Grade II Registered Park and Garden and would lead to significant adverse impacts on Great Waltham and Little Waltham Conservation Areas, together with other designated and non-designated heritage assets.
- CCC's preferred option is that alternative mitigation in the form of underground cabling should be used for this section.
- Alternatively, different alignment should be chosen with further consideration being given to relocating the route to the north of Great Waltham and Little Waltham.
- Finally, upon exhausting the above options, regard should be given to the introduction of T pylons along this part of the route.
- There is insufficient information to demonstrate that the proposal would be beneficial in historic environment terms and that the identified harm created by the introduction of lower height pylons would outweigh the identified harm proposed by standard 50 metre height pylons.
- The impact of proposing full or lower height pylons has not been adequately assessed to come to a view on the impact on the historic environment. An in-depth review and balancing exercise needs to be undertaken and the two options needs to be appropriately weighted.

- Further review of the type, spacing and nature of the pylons is required. Where harm is unavoidable, mitigation and heritage compensatory measures including funding should be delivered.
- The proposal would represent increased and harmful pressures on woodlands, trees, hedgerows and Local Wildlife Site(s) and sufficient mitigations and buffers would need to be provided. Where harm is unavoidable arboricultural compensatory measures should be delivered to offset harm. Pylons TB139 and TB140 would be sited close to the Conservation Area this could lead to unacceptable and irreversible harm to protected trees if these were removed
- An in depth review should be undertaken of the alignment to assess Public Health impacts. Impacts would be particularly noticeable at Windmill House where the siting of pylon TB141 would be directly visible and noticeable from the property and in views along Chelmsford Road. The review should inform a relocated pylon location that balances the impacts upon the amenities of the occupants of Windmill House, against the visual and heritage impact of the proposal.
- Ecological survey data should be provided in respect of the repositioning of pylons TB135 to TB142 (previously TB133 to TB140) to ensure that repositioning avoids veteran trees and protected species including bat roosts.
- There is insufficient information to demonstrate that the proposal would be beneficial in landscape and visual terms and that the identified harm created by the introduction of lower height pylons; would outweigh the identified harm proposed by standard 50 metre height pylons.
- The impact of proposing full or lower height pylons has not been adequately assessed to come to a view on the impact on the landscape and visual environment. An in-depth review and balancing exercise needs to be undertaken and the two options needs to be appropriately weighted.

Margaretting

6.6 In consultation area 9 (Margaretting):

- The pylon route would raise heritage implications and mitigation measures should be provided.
- The proposal would represent increased and harmful pressures on woodlands, trees, hedgerows and Local Wildlife Site(s) and sufficient mitigations and buffers would need to be provided. Where harm is unavoidable arboricultural compensatory measures should be delivered to offset harm.
- A full construction management plan and air quality impact assessment would need to be submitted as part of the Environmental Statement to ensure that the amenities of neighbouring residents are protected throughout the construction period.
- The Highway Authorities wider concerns relating to the effects of construction upon nearby Three Mile Hill should be considered.

Other Matters

6.7 It is expected that National Grid will have regard to the comments of other relevant stakeholders and interested parties.

APPENDIX: ECC Place Services Comments in relation to Principle of Development and Affected Chelmsford Parishes

Highways and Transportation Response

It is noted that a number of points were mentioned previously in the 2024 summer consultation on the proposed access routes or points. No changes as a result of these comments have been mentioned in this latest non statutory consultation, although we note that some have been discussed informally. However, we continue to formally re-iterate the points raised to ensure they have or are being considered:

1. The crossing points and bell mouths show limited detail in the consultation documents, although we anticipate this will be provided later in the process. However, for the avoidance of doubt each crossing point and bellmouth requires the following information to be submitted at DCO:
 - Visibility splays within the DCO redline or public highway based on the road speed limit or surveyed speed data.
 - Vehicle swept paths.
 - Traffic Management.
 - Data on the relative use of the access (i.e. total vehicle movements, peak vehicle movements broke down by vehicle class).
 - A Stage 1 Road Safety Audit with designer's response.
 - Road construction.
2. Further information is sought on whether any management processes may be put in place given the unsuitable nature of the location for high HGV traffic volumes on Wick Lane.
3. The Council do not support the use of access H25-A2 shown on Section F Sheet 3 due to potential impacts on the use of the layby in this location and would request consideration of other access locations.
4. It needs to be determined whether any widening is required for a number of accesses including Chatham Hall Lane for accessing H27-A1.
5. Consideration needs to be given to any interaction between pylons TB130 to TB132 and Phase 2 of the Chelmsford Northeast Bypass, which has planning permission.
6. For the Primary Access Route providing access to H28-A2 and H29-A1, the Applicant should consider pinch points along the route, including on Rainsford Road to the immediate west of its junction with the A1016, and further assessment should be undertaken of the A1060 junction with Park Avenue. It would be beneficial to understand whether the presence of the haul road would negate the need for any traffic to travel through Chelmsford. If the route is to be used, the Council would want to see peak hour restrictions on HGV movements on this route. The junction of the A1060 with Lordship Road is proposed to be improved as part of an 880 dwelling residential development to the immediate north of the A1060 that currently has a resolution to grant subject to s106 (Chelmsford Planning Application Reference: 21/01545).

7. For the Primary Access Route to H29-A2 and H30-A1 the immediate bend before the accesses on A414 has a recent road collision resulting in a fatality, and consideration should be given to what measures can be put in place as a result of the road speeds.
8. Consideration should be given to options for accessing H30-A2, including whether traffic from the south can use the existing slip road on the A12 instead of routeing through Margaretting and whether access can be achieved from Writtle Road rather than using Ivy Barns Lane, which is unsuitable.
9. For the bridge strengthening works at F7, considerations should be given to a worst-case assessment of the impacts on the highway network, in the event of the works being undeliverable. There are concerns that this route is used to access Pylons 186 to 201 and the appropriateness of its use and the implications on the remainder of project or the need for alternative routes as a result.
10. The location of access H32-A1 on the B1002 could not be identified on the plans provided.
11. Within Section G of the Consultation Plans; National Grid Drawing Reference AENC-NG-ENG-PLN-0008 shows the haul route connecting to the A128 running adjacent to Dunton Hills Golf Course. As this does not form part of the primary access route, we would query its purpose and potential use.

Archaeology Response

Essex 7 Chatham Green

No archaeological impacts as a result of the changes have been identified. Based on the Historic Environment Record we would see the proposals having a similar impact to the original proposals so we have no specific comments of this change.

Essex 8 Little Waltham

No archaeological impacts as a result of the changes have been identified. Based on the Historic Environment Record we would see the proposals having a similar impact to the original proposals so we have no specific comments of this change.

Essex 9 Margaretting

The conclusions drawn in Environmental Implications of Change – Essex 9 are agreed. There would be no change to the type or significance of the archaeological effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.

Ecology response

Essex 7 summary of changes: (falls within Chelmsford CC)

The proposed change is extending the project order limits for the portion of route including pylons TB128 to TB133 (previously presented as TB126 to TB131), which is south of Great Leighs. This is in response to consultation feedback which asked for / expressed concern about:

- Essex County Council has recently consulted on its draft updated Essex Minerals Plan and identified that this land could be allocated as a mineral site

Extending the project order limits in this area to the southeast would allow for flexibility if the location were to be allocated in the updated Essex Minerals Plan.

Environmental Implications of Change as stated:

The proposed alignment change would cross an additional two mature tree / hedge lines. The proposed change would be closer to Lyonshall Wood Local Wildlife Site which is also ancient woodland.

Although closer to a Local Wildlife Site and two additional tree / hedge lines being crossed, there would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.

Comments:

The potential for works to be closer to the Lyonshall Wood LoWS (ancient woodland) is notable though it is reasonable to anticipate that mitigation (buffering) could/would be employed to avoid direct impacts to the designated site.

Examination of the original TB126 to TB131 route using Google Earth shows the route intersecting hedgerows at relatively benign (treeless) locations. The proposed expansion of the DOL to the southeast opens the potential for impacts to a different set of hedgerows with trees that are more closely connected to the LoWS. These hedgerows also appear to have far fewer (if any) options for lower impact crossing points.

Without any ecological survey information to reference, we are prohibited from reaching a fully informed conclusion on the significance of the proposed change with respect to potential ecological impacts. We consider that a realignment of the route further southeast appears to have greater potential for impacts to Priority Habitat hedgerows, veteran trees, bat roost trees, badger setts, and hazel dormice. We will expect that appropriate survey data has been collected to allow an informed impact assessment of the possible expansion of the DOL to the southeast.

Essex 8 summary of changes: (falls within Chelmsford CC)

The proposed changes include alteration of the alignment of pylons between Great Waltham and Little Waltham, plus proposing to change the pylon design from full height lattice pylons to lower height lattice pylons.

This is in response to consultation feedback which asked for / expressed concern about:

- reducing the visual impact of the pylons on conservation areas

The proposed changes also include repositioning pylons TB135 to TB142 (previously presented during statutory consultation as TB133 to TB140) to avoid veteran trees and protected species.

This is in response to consultation feedback which asked for / expressed concern about:

- the positioning of the pylon to the south of the River Chelmer

Environmental Implications of Change as stated:

The proposed change would move the alignment further away from Langley's Deer Park Local Wildlife Site. In addition, greater vegetation clearance would be needed for the proposed low height towers. However, with appropriate mitigation, there would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.

Comments:

If the repositioning of pylons TB135 to TB142 (previously TB133 to TB140) avoids veteran trees and protected species (bat roosts?), that is welcomed, although we do not have access to survey data to confirm that statement. In general, we agree with the Environmental Implications of Change statement.

Essex 9 summary of changes: (falls within Chelmsford CC)

The proposed change is to move a temporary construction laydown area from a site close to Ivy Barns Lane to a position further northwest.

This is in response to consultation feedback from nearby residents.

Environmental Implications of Change (Ecology and Biodiversity) as stated:

The northwest corner of the proposed change would be in close proximity to an ancient woodland block which is also a local wildlife site (James' Spring Local Wildlife Site). The proposed laydown area also would be in close proximity to a mature band of trees to the north. However, there would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.

Comments:

We expect that mitigation (buffering) would be employed to avoid impacts to the James's Spring LoWS, and appropriate mitigation would be enacted for any works required to the line of mature trees along the access track to the laydown area (e.g. limb reduction). Assuming those points, we agree with the Environmental Implications of Change statement.

a. -----

Landscape and Visual Issues Response:

Overarching comments:

The comments made within this consultation do not override our previous consultation responses. Where we state that we 'agree or accept' that the proposed changes will not likely result in changes to type or significance of visual or landscape effects (independently or collectively), this follows our previous comments on judgements and should be read in conjunction with previous consultation where appropriate or necessary.

Essex 7

The 'Environmental Implications of Change' report states: "The proposed change would introduce one larger angle pylon into the landscape in close proximity to Long's Farm." The Targeted

Consultation Leaflet outlines the expansion of the Order Limits to allow flexibility with consideration of the upcoming Essex Minerals Plan and the relocation of the temporary construction laydown area. The EIC Report concludes that: "In terms of landscape, effects on landscape character are likely to be similar" and that "There would be no change to the significance of landscape and visual effects". We broadly agree that effects on landscape would be similar to those at previous consultation. While we note details of the proposed changes to visual effects have been described, no update on visual effects have been included.

Essex 8

The Targeted Consultation leaflet states that the applicant is '... proposing to change the alignment of pylons between Great Waltham and Little Waltham. In the same area, we are also proposing to change the pylon design from full height lattice pylons to lower height lattice pylons.' The revisions proposed include:

1. The repositioning of 3no. pylons (TB136, TB142 and TB140) and;
2. The use of 'lower height pylons' for 7no locations (TB136 to TB142)

The 'Environmental Implications of Change' report states: "The proposed change would move the alignment further away from Chatham Hall Bungalow but moves the alignment closer to Albion House" and that "The proposed change would also alter some pylon locations, most notably bringing a pylon into closer proximity to Windmill House on Chelmsford Road."

Further "The reduction in height of the pylons would be beneficial in more distant views, such as those from within, and to the west of, Langley's Registered Park and Garden, from the wider footpath network (including the Saffron Trail and Essex Way), and from the settlements at Great Waltham and Little Waltham, including the Conservation Areas." However, "In relation to closer views, the benefit resulting from the reduction in height would be balanced out by the wider, heavier (in terms of steelwork) and more squat appearance of the lower height pylons. Furthermore, due to changes in location of the pylons, some would be closer to receptors."

Our response on the revised proposals are as follows:

Visual Amenity: We broadly agree that the revisions potentially result in similar impact or "slightly greater due to the heavier and wider nature of the low height structures". We also agree that the repositioning results in some pylons being located closer to receptors and therefore impacts could be considered greater than previous proposals.

Essentially, the potential reduction in effects for long distance views has resulted in the increased impact on closer views.

It is worth noting that while the lower height pylons are considered favourable in terms of long distant visual impact, the power lines are presented in a denser cluster, resulting in potentially greater impact from the lines in addition to the aforementioned heavier structured pylons. Furthermore, the lower height pylons also lower the height of the lines and increases sense of enclosure and impact on openness of a flat, open landscape and the perceived tranquillity of the area.

Landscape Character: The repositioning of 3no. pylons would not likely alter the previously judged effects on landscape character, and we generally agree with the findings within the 'Environmental Implications of Change' report.

The revisions allow for the retention of mature vegetation which contributes towards the character of the area. As previously stated, while we agree views of the Project would likely be filtered, introduction of pylons will likely degrade the setting of the Grade I Listed 'Langleys' (1305533). We raise further concerns regarding the setting of Grade II 'Langleys' Registered Park and Garden and both Great Waltham and Little Waltham Conservation Areas where valued landscape features contribute greatly with riparian landscape associated with the River Chelmer and form both the landscape setting of these Conservation Areas and the contribution towards separation. Langleys Park is specifically mentioned as a landscape feature in the Essex Landscape Character Assessment 2002 identified within LCA 'Chelmer Valley' (C5).

Generally, we agree that '...overall, there would be no change to the type or significance of landscape and visual effects as a result of the proposed change, when compared to the design and PEIR presented at statutory consultation.'

For clarity, in the PEIR the applicant notes the following:

- Significant temporary negative effects to the designated heritage asset, Registered Park and Garden, Langleys
- Significant permanent negative effects to designated heritage assets, Registered Park and Garden, Langleys
- Significant temporary negative effects are likely to be experienced at the construction stage on landscape character area Chelmer Valley LCA C5, because of construction of the overhead line and associated vegetation loss south of Great Waltham and north of Little Waltham, crossing the River Chelmer
- Significant permanent effects are likely to be experienced at the operational stage on the following LCAs/LCTs because of direct or indirect effects: Chelmer Valley LCA C5 - direct and indirect effects would occur because of the introduction of the overhead line south of Great Waltham and north of Little Waltham, crossing the River Chelmer
- Significant effects are likely to be experienced from the following Visual Receptor Areas within Section F during construction: Area F3 Great Waltham and Area F4 Little Waltham
- Significant permanent effects are likely to be experienced from the following Visual Receptor Areas within Section F during operation: Area F1 Great Leighs; Area F2 Peverel's Farm; Area F3 Great Waltham; Area F4 Little Waltham

Essex 9

The 'Environmental Implications of Change' report states: "The proposed change would move the proposed laydown areas further from property at Handley Green, reducing visual effects during construction, but closer to properties at Ivy Barn." We broadly agree with this.