

## Deadline 3 - Comment on Examining Authority's Written Question DES1.6 (Holford Rules)

By the North-West and South-West of Chelmsford Parishes Group ( [REDACTED] )

With reference to Great and Little Waltham (re: Rule 1) and elevated land west of Broomfield (re: Rule 4)

### Introduction

North-West and South-West of Chelmsford Parishes Group ('the Parishes Group'/'the Group') is an alliance of 9 parish councils: Broomfield, Chignal, Great Waltham, Highwood, Ingatestone and Fryerning, Little Waltham, Margaretting, Roxwell and Writtle. The Group is grateful for the opportunity to comment on question DES1.6 and trusts this will be useful to the Examining Authority (ExA).

### Rule 1 – re: Great and Little Waltham

1. The ExA has asked the Applicant to set out how Holford Rule 1 has been used to design the route, specifically in relation to 4 locations, including the above. The Parishes Group agrees that this is a very pertinent question.
2. The Group believes it is also relevant to Holford Rule 2, particularly the note to Rule 2 which states:  
*'Where possible choose routes which minimise the effects on the setting of areas of architectural, historic and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.'*
3. All of these features are present at the Walthams. The significant impacts of the Application upon them are outlined in the independent Landscape Report (Alison Farmer Associates) which is included in our Written Representations [REP1-261]. These are briefly summarised in para 2.3 of the Report as follows:
  - *The high concentration of sensitive and valued assets within the Waltham area giving rise to effects which NG acknowledge would be significant adverse within approximately 1km for both heritage and landscape.*
  - *Other adverse effects in the Walthams area including impacts on churches and sense of place which are insufficiently considered to date.*
4. The Parishes Group maintains that Holford Rules 1 and 2 have not been given sufficient weight by the Applicant in route selection, given the existence of alternatives such as the 'Corridor L/Q' route to the east and south of Chelmsford.
5. Whilst this alternative would also need to cross a conservation area (the Chelmer and Blackwater Navigation), it could be achieved with less adverse effect by replacing the existing 132kv distribution line with the new 440kv line. In so doing, it could be realigned to close parallel the existing 440kv line, with more coherent siting of pylons than at present, potentially leading to an improvement on the status quo. The guidance in Holford Rule 2 is to use route selection to '**minimise the effects**' and the Parishes Group maintains that using this Corridor L/Q route would result in less effects than the Preferred Route.

#### Rule 4 - re: Elevated land west of Broomfield

1. In DES1.6, the ExA also asks the Applicant to provide further information on the application of Rule 4 for the route of the proposed development, including details of where the route crosses ridge lines. The Parishes Group would like to draw the ExA's attention to an example within the area that it covers – elevated land west of Broomfield known as the Pleshey Farmland Plateau.
2. Given the general topography of Essex, it may be ambitious to identify 'ridges' in the same sense as in mountainous terrain. However, the key point of Holford Rules 4 and 5 is to avoid setting OHL and pylons against the skyline where the full extent of the structure is visible. The Preferred Route clearly fails to avoid this effect in this section of OHL.
3. Map A indicates the change in topography in Broomfield, with land rising relatively quickly from the Chelmer Valley to the Pleshey Farmland Plateau. It shows the Preferred Route for OHL and pylons on the highest land where they would be highly visible, set against the skyline, when viewed from the valley slopes below. These include a range of receptors – in the village of Broomfield, Broomfield Hospital, the busy B1008 and people using the extensive network of mainly east/west footpaths.



MAP A— RELIEF MAP OF BROOMFIELD PARISH

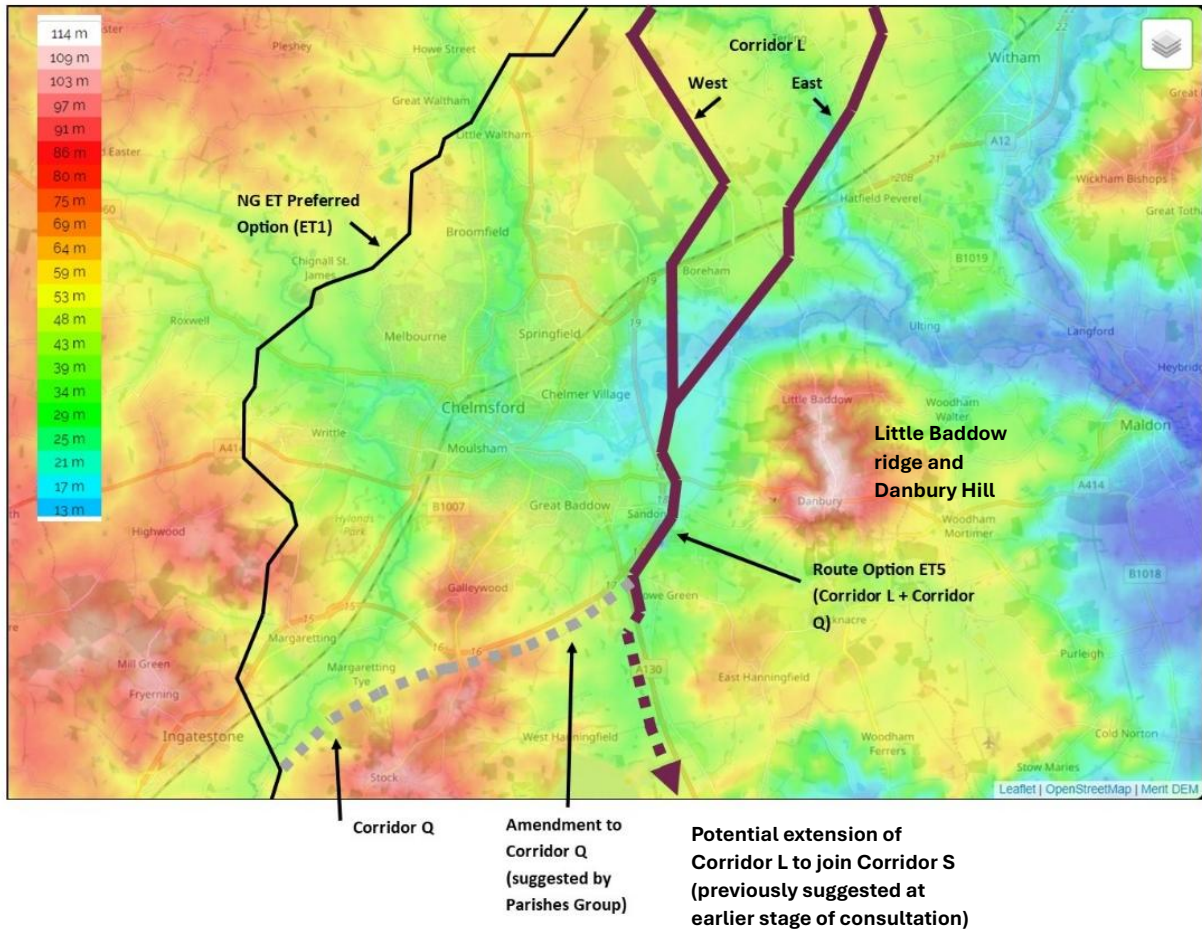
4. Holford Rule 4 states:

*Choose tree and hill backgrounds in preference to sky backgrounds wherever possible;*

and the Notes on Rules 4 and 5 state:

*Utilise background and foreground features to reduce the apparent height and domination of towers from pan viewpoints.*

5. The following map shows the topography of the wider Chelmsford area. It shows the Preferred Route (ET1) and the alternative 'Corridor L/Q' route to the east and south of Chelmsford. Broadly this is the alternative route proposed by Parishes Group in its representations. This illustrates how the Preferred Route generally follows more elevated land to the north and west of Chelmsford, cutting across intervening valleys. By contrast, a significant section of the Corridor L/Q Route lies on the lowest land in the area, with Danbury Hill and Little Baddow ridge set behind it when viewed from Chelmsford and the A12. Other sections follow a dip in the land between Galleywood and Stock. The overall effect tends to obscure the lower sections of pylons against a wooded backdrop.



## 6. Conclusion

It seems clear that the correct application of Holford Rules 4 and 5 would lead to the preference of the Corridor L/Q route (ET5) as opposed to route north and west of Chelmsford that is proposed in the Application. Further information is contained in para 4.2.3 of the Explanatory Paper within our written representation [REP1-261]