

Deadline 3 - Comment on Examining Authority's Written Question LV1.20 (Holford Rule 6)

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

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 LV1.20 and trusts this will be useful to the Examining Authority (ExA).

Background

In Written Question LV1.20, the ExA asks the Applicant:

Is there a risk that in following (Holford Rule 6) the adverse landscape effects of OHLs and pylons are in fact spread out over a larger area and maximised (particularly in generally flat countryside) instead of concentrating harm along corridors?

The Parishes Group has the following comments on this question at this stage:

1. The Group strongly agrees that there is a significant risk. This is illustrated in the Chelmsford area, where a completely new corridor of adverse landscape effects is proposed to the north and west of Chelmsford in addition to the existing corridor to the east of the City.
2. Unless more efficient use of an existing corridor is completely infeasible from a technical perspective, the Group questions how creating a new corridor of adverse effects is compatible with the legal duty of network operators under the 1989 Electricity Act to:
 - a) *have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and*
 - b) *(operators) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.*

Unless it can be shown that the landscape within a proposed new corridor is already significantly degraded, and that it has no relevant features of interest, it is self-evident that the creation of a new corridor will lead to greater adverse impacts on the preservation of natural beauty overall. Choosing the least harmful route is a key part of mitigating effects on the natural beauty of the countryside.

3. Dispersing routes can remove positive opportunities to rationalise existing lines. In areas like east of Chelmsford, where an existing lower voltage line already parallels an existing high voltage line, the pylon and cable heights and the distances between pylons are likely to differ between the two lines, creating a more fragmented and confusing appearance. If there is the opportunity to replace a lower voltage line with a higher voltage line, it may be possible to improve upon the status quo. This is alluded to in the Note to Rule 6 which says:

Arrange wherever practicable that parallel or closely related routes are planned with tower types, spans and conductors forming a coherent appearance;

4. NPS EN-5 also states that the principal ways of mitigating potential adverse landscape effects include:

'The rationalisation, reconfiguration, and/or undergrounding of existing electricity networks infrastructure in the vicinity of the proposed development.' (Para 2.10.5, December 2025 version).

This clearly indicates that simply avoiding existing lines by creating new transmission corridors should be a last resort in planning new networks, appropriate only where rationalisation, reconfiguration and/or undergrounding are impossible.

5. Therefore, the Group also believes it is essential that initial assessments include scenarios both with rationalisation and without, wherever rationalisation is possible. Otherwise, it is difficult to assess landscape effects clearly and accurately as it's unclear which effects would be satisfactorily mitigated by line rationalisation and which would not. For instance, re: Chelmsford area, the Topic Baseline Overview for the Corridor L section (Appendix D, CPRSS Appendices, p. D18-22) [REP1-068] does **not** distinguish clearly between these scenarios, making this section of the document of limited value for decision making.
6. Finally, other Holford Rules also need to be applied and balanced to gain a full picture. For instance, Holford Rules 4 and 5 would suggest the desirability of a route east of Chelmsford, alongside the existing power lines, with rationalisation of lower voltage lines deployed to make this possible. In this situation, creating a new different corridor is clearly not appropriate. In other situations, of course, the balance of consideration of the Holford Rules as a whole might be different.