

Deadline 3 - Response to the Applicant's Comments on Written Representations [REP2-029]

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

Introduction

1. 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 submitted a detailed written representation at Deadline 1 [REP1 – 261] proposing an alternative overhead line (OHL) route around Chelmsford, informed by an independent Landscape Report. The Applicant provided comments on this proposal at Deadline 2 [REP2-029].

Purpose

2. However, the Applicant's comments are at best partial and are in places confused. The Group welcomes the Examining Authority's (ExA) written question ALT1.6 which requests the Applicant to provide a more detailed response. However, to avoid delay to the Examination process, the Group considered it would be helpful to briefly respond to the Applicant's current comments at this stage, as set out below.

Confusion about a route via Rayleigh

3. In the 3rd paragraph of their comments, the Applicant refers to constraints around Rayleigh and between Rayleigh/Tilbury. However, the Group does not propose adding additional network capacity via Rayleigh. Its proposal is for a new route diverging from the Preferred Route at Fairstead and rejoining it at Buttsbury near Ingatestone. Constraints around Rayleigh would therefore not be relevant.

Confusion about OHL

4. Although the Group strongly supports the use of HVDC cabling (underground or offshore) throughout, its proposal in this representation is for an alternative 440kv route comprising entirely OHL. The Applicant's 1st paragraph of comment, which re-iterates the Government's strong starting presumption for overhead lines, is therefore puzzling and suggests that the Applicant hasn't understood the nature of the Group's proposal, which fully complies with NPS EN-1 and EN-5 in this regard.
5. The Group's proposal for an alternative route to the east and south of Chelmsford would entail some additional undergrounding of the 132kv distribution network line. We calculate that at least 2.65km of additional rationalisation would be required. However, this is also entirely consistent with the Government's approach as set out in EN-5 (for instance, para.s 2.10.5 and 2.11.3, 2025 version) which requires active consideration of '*the rationalisation, reconfiguration, and/or undergrounding of existing electricity networks infrastructure in the vicinity of the proposed development*'.

Cost Comparison of the Group's Proposal with the Preferred Route

6. The Group notes the Applicant's statement that the Group's proposals would experience 'broadly comparable costs' with the Preferred Route, before the introduction of any specific interventions that might be required. This reflects the Group's understanding, which derives from the Corridor and Preliminary Routeing and Siting Study Report April 2022 (CPRSS) [APP-356]. The Group's suggestion, explained in our written representation, of using transposition to avoid an underground crossing of the existing 440kv line near Fairstead would reduce the cost of our proposal compared to the Preferred Route (as well as reducing impacts on the historic environment near Fairstead). This saving could be

redeployed toward the cost of any necessary interventions, such as additional undergrounding of the 132kv distribution line.

Constraints around Sandon

7. The Group agrees that there would be apparent constraints at Sandon, if the new 400kv line were to follow the exact alignment of the existing 132kv line, although it does not agree that these could only be resolved by using a tunnel. The Group's proposals include a number of variations to the two main alignments suggested, specifically to provide flexibility to address potential constraints. One of these variations entails keeping the new 440kv line on the eastern side of the A12, avoiding Sandon village entirely and therefore the constraints that the Applicant has mentioned.

Comparison of level of harms

8. The Group's written representation includes a detailed explanation of the significant harms arising from the Preferred Route. These are set out in Section 4 of the Explanatory Paper and include *inter alia* the significant harm to the historic environment at Great and Little Waltham and other areas of high amenity; the topographical setting, impact on BMV land and PRowWs etc. These harms are the subject of the independent Landscape Report by Alison Farmer Associates which forms part of our written representation.
9. The Applicant's comments show no recognition of the extent of these harms. They are not mentioned in their comments except to say the Group's proposed route to the east and south of Chelmsford would simply lead to 'a different balance (of environmental effects) transferred to other locations'. Our written representation shows that this is not the case.

Conclusion

10. It is regrettable that the Applicant felt unable to engage with the Parishes Group prior to submission as promised, beyond the one meeting in July 2024. This would have ensured that the Applicant thoroughly understood the Group's proposals and that potential solutions to any constraints were explored before Examination. The Group is grateful to the Examining Authority for its intervention in this regard. It trusts that, while this further information from the Applicant is awaited, the above points will be of assistance to the Examination.