

Deadline 5 – Representation regarding the Applicant’s Comments at Deadline 4

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, Ingatstone and Fryerning, Little Waltham, Margaretting, Roxwell and Writtle.

Purpose

2. The Parishes Group notes the ExA’s request for IPs to provide a summary of their case and outstanding differences with the Applicant at Deadline 7, rather than restating it at each deadline. Therefore, this presentation seeks to comment only on new or specific points raised by the Applicant at Deadline 4, particularly where the Applicant may wish to present further evidence at the next stage.

Summary of Applicant’s Comments at ISH2 [REP4-302] - Alison Farmer Associates Report (‘the AFA Report’)

3. In the Recording of ISH2 Day 2, Part 5 at 55 mins in, the Applicant’s barrister undertook to provide a full written response to the AFA Report. However, in their Summary of Oral Comments [REP4-302] at para. 8.3.r, the Applicant states that they have already responded to it in their Addendum to Comments on Relevant Representations – Part 2 [AS-089], pp 650-654. There is no reference to a forthcoming written response.
4. We raise this point now in case the need to respond to the AFA Report has been overlooked. The quoted pages in [AS-089] are not a response to the AFA Report. Rather, they appear to contain an outline of the Applicant’s general approach to various other landscape assessments. The AFA Report remains the only detailed assessment of the relative impacts of both the Preferred Route and the east/south of Chelmsford alternative.

Applicants Comments on any further Information or Submissions received by Deadline 3 [REP4-298]

5. In this document, pp. 240 – 245, the Applicant provides some further comments on the Group’s proposals for alternative alignments to the east and south of Chelmsford. They refer back to the Applicant’s Response to First Written Questions [REP3-074], ALT1.6 (p.72) in which the Applicant stated of the east/south Chelmsford route:

‘Whilst conceptually possible in certain sections there are also locations where there is no reasonable solution to secure a route for either 400 kV cable or overhead lines.’

This position is restated in these further comments, citing a *‘lack of sufficient space to safely provide a route for an undergrounded 132kv connection, a new 440 overhead line connection and, in a number of places temporary 132kv and 440kv diversions ...’*

6. However, there is a lack of detail and evidence to support these assertions. For instance, in which sections is this alternative alignment *‘conceptually possible’* and in which locations is there *‘no reasonable solution’* and why? Do these comments refer to the entirety of Corridor L – both Eastern and Western Arms, which experience quite different potential constraints – or is the Applicant referring primarily to the Western Arm containing the existing 440kv line? How are temporary diversions normally achieved where they are necessary for maintenance or to upgrade technology? Further information and detail would be helpful (particularly with accompanying maps), as this would enable a better assessment and comparison with the detailed maps in the Group’s written representation [REP1-261].

Transposition

7. The Parishes Group is grateful to the Applicant for addressing this issue. Transposition is not necessary to achieve the Group's proposed alignment to the east and south of Chelmsford but, at the Group's meeting with the Applicant in July 2024, it was noted that:

'Transposition is fine in principle – and therefore a good solution to the need to cross another high voltage line. However, it is more complex in practice due to the need to preplan the necessary outage (which needs at least a year's lead in).' (Notes of meeting, Annex A, REP1-261)

The Group therefore included transposition in preference to underground crossings (with cable sealing ends etc) where appropriate, on grounds of potential lower cost and with the expectation that outage requiring a year's planning can be comfortably accommodated within the Project's construction phase.

8. However, in these new comments, the Applicant has raised further potential issues with transposition in addition to planned outage. These are: access to circuits to maintain the security of the system; replacement of protection systems and movement of reactive compensation; reconductoring and potentially pylon changes. It would be helpful to have more detail about these. For instance, are these normal features of transposition (which we understand is a common occurrence to upgrade to new technology) or not?; how likely is it that existing pylons would have to be replaced (bearing in mind that both sets of pylons would be designed for 440kv lines)?; in broad terms, how does the cost of transposition compare with the cost of an underground crossing of an existing 440kv line?

Identified Valued Landscape west of Broomfield

9. The Applicant's Comments [REP4-298], pp. 245-7, include some points about their use of neighbourhood plans (NPs). We have already raised concerns about this [in REP3-102], so will not repeat them in detail now, but for clarity the key issue is about the use of the evidence base that supports a NP. It is one thing to acknowledge the existence of such studies now, and another to use them to help reach the judgements made in the ES. In the case of the Broomfield NP, there is no evidence that the NP Landscape Appraisal [REP3-105] and the 'Review of Local Green Space, Valued Landscape and Key Views' [REP3-106] have been used to reach judgements in the ES. There is no reference to them in the ES and they are not listed in the bibliography.
10. The Applicant's Comments on pp. 246/7, (responding to REP3-106) confirm their methodology of assessing landscape value by utilising landscape character areas (LCAs) as part of the impact assessment process. The character areas to the west of Broomfield comprise the Central Essex Farmland LCA (assessed as being of medium value) and where adjacent to Broomfield, the Chelmsford and Environs LCA which is awarded a low-medium value, contrary to the Valued Landscape assessment. By using the broader LCA classification to award single sensitivity judgements, the Valued Landscape west of St Mary and St Leonard's Church Broomfield is not acknowledged.
11. The Group considers the value to be higher than medium or medium-low in this location by virtue of its perceptual qualities such as tranquillity, lack of overt development and historical features. This matters because an understanding of value feeds into an understanding of sensitivity which in turn informs judgements on significance of effect. The Group agrees with the Applicant that there would be major and significant effects within 500m but contends that they extend further than this in the area west of Broomfield. This issue affects both confidence in the Applicant's proposed scheme and the relative merits of alternative routes in the Chelmsford area.