

N2T – OFH4: Oral Contribution by Brumfelda, Broomfield's Local History Group (full text).

Thank you for this chance to address the Panel. Thank you too for studying our recent representation [REP4-352] and picking up some of the issues we raised in Written Question HE2.11.

I obviously won't repeat what we said in that representation except to summarise (from the attached report by our archaeological consultant [REDACTED]) that:

- a) The site is a potentially unique Romano-British temple site because it appears to continue on from prehistoric ritual use in roughly the same position;
- b) There appears to be a strong relationship between the likely temple itself and the wider context of the surrounding landscape; and
- c) The project is at an early stage of discovery, so there is much that cannot be safely predicted at this stage; and much that could be lost if we get things wrong.

In your Written Question HE2.11, you asked the Applicant to comment on our representation (i.e. the [REDACTED] report) and outline the scope for avoiding impacts through the potential to microsite pylons at the detailed design stage. Sadly, the Applicant's response [REP5-211] left us feeling somewhat underwhelmed and very un-reassured. We didn't feel that the Applicant had got to grips with the potential value of the site, which they classified as 'a relatively small asset'. That does not take account of the asset's potential relationship with its wider setting.

It also seems extraordinary that some six weeks before the end of the Examination, the results of trial trenching are still not available; and that geophysical surveys have only recently become so. We're puzzled as to how the Applicant has taken into account EN5, para.2.10.1 about considering and addressing routing and avoidance if they don't know what's there at such a late stage. We also note Essex County Council's concerns that, due to soils, geophys results may not be complete or illuminating. Therefore, we feel it is still very unclear what the impact of the N2T Project will be on this site and exactly what will be permanently lost.

Turning to your question about the potential to avoid impacts through amended micrositeing of pylons. The Applicant says that there would be potential to move the pylon working areas and haul road within the Limits of Deviation, but then immediately says this would depend on balancing various considerations such as engineering feasibility, ground conditions and proportionality of costs. There is only a 'small potential' to move the working area for pylon TB149 laterally and probably none longitudinally. The answer to the question of the potential to avoid impact through micrositeing therefore appears to be 'Very little to none at all'.

We are also somewhat confused about the potential need for a Faraday Cage over the adjacent gas pipeline. At the formal consultation stage in 2024, there apparently was a need. The Order Limits included a significant east-west salient for this purpose which took the working area even closer to the asset than did the pylon itself. It now seems unclear if the Faraday Cage is needed or not.

All in all, therefore, the History Group's view is that site can best be protected by a change of alignment. This would also better comply with EN1, para 5.9.18 which notes that 'a documentary record (of excavation) is not as valuable as retaining the heritage asset'. In our earlier written rep [REP1-215], we proposed a slight change of alignment of approximately 100 metres the west. This would also have a slight but beneficial effect on the setting of the listed vault west of Partridge Green Farm.

More effective still would be the use of the 'West of Great Waltham alternative'. This would be only 1.36km further than the Preferred Route and would avoid the site altogether. At the same time, it would remove proposed overhead lines from the Walthams Gap with its host of sensitive heritage assets both above and below ground. We note from Section 9.2.4 of the Design Development Report [APP-122] that even the Applicant recognises the relative heritage advantages of this alternative, so we commend it and the other alternatives in the Chelmsford area to the Examining Authority.