

Norwich to Tilbury Examination – Deadline 7.

Representation by the North-West and South-West of Chelmsford Parishes Group

Re: Applicant's Comments on any Further Information or Submissions received by Deadline 5 [REP6-114].

Introduction

1. The 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.
2. This representation relates to pages 68-70 of the above document, in which the Applicant comments on our earlier REP5-260.

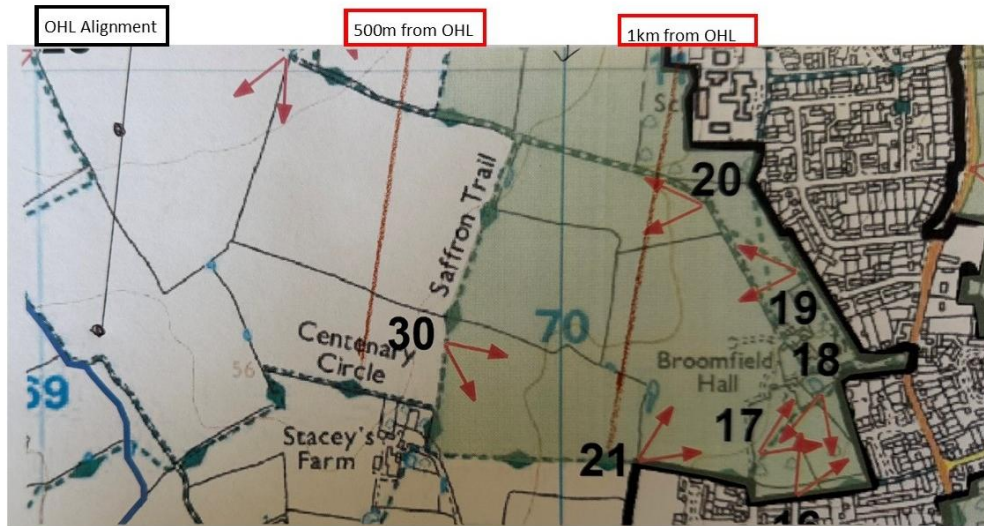
Applicant's Use of 'Finer Grain' Landscape Assessments

3. The Applicant used the Essex County Landscape Assessment (LCA B1 and LCA G2) to reach its judgements. The Chelmsford LCA and more local assessment associated with the Broomfield Neighbourhood Plan (NP) are finer grain and provide further information on the value and sensitivity of the landscape. The Applicant does not appear to have adjusted its judgements based on these finer grain assessments and evidence. This is despite its statement that '*the Applicant is able to draw its own conclusions about value and susceptibility*' from a range of evidence. If reference was indeed made to these more detailed assessments showing higher value ratings, then the Applicant must have consciously concluded that they indicated no increased value or sensitivity. This is contrary to the evidence.
4. The Parishes Group does not dispute that the Applicant has previously included reference to Neighbourhood Plans in APP-085 and REP4-185. However, the Group's point is that the Applicant did not use the landscape assessments which underpinned the NP nor did it include these assessments in its document lists, which tends to confirm the Group's point. The Applicant does not attempt to rebut this criticism and its continued reference to the same documents, APP-085 and REP4-185, suggests it is seeking to avoid this point.

Valued Landscape west of Broomfield

5. The Applicant and the Parishes Group are both in agreement that significant adverse effects extend beyond 500m from the proposed OHL in the area west of Broomfield. The Valued Landscape lies within this area (see annotated plan below). Given this, it can be concluded that the proposed development would indeed adversely affect the Valued Landscape west of Broomfield. However, this conclusion is not explicitly acknowledged by the Applicant.
6. Further, the Applicant has concluded a landscape value of low-medium adjacent to the area of Broomfield just over 1km from the proposals. However, the more detailed assessments of this area (such as the NP assessments referred to above) demonstrate that it has greater value and therefore higher sensitivity. Therefore, the Group holds that, even with this greater distance, the effects of the OHL on the area adjacent to Broomfield village would be significant adverse. The Applicant already agrees that sensitivity is moderate to high in LCA G2 – this does not suddenly cease at a line 1km from the OHL.

VALUED LANDSCAPE WEST OF BROOMFIELD (SHADED GREEN)



7. The Applicant states that *'there will be no direct landscape effects, such as loss or changes to landscape features within the Valued Landscape ...'*. However, this is to miss the point - indirect effects also give rise to significant adverse effects.

Comparison of the Preferred Route with the east and south of Chelmsford alternative

8. The Parishes Group holds that landscape matters considered by the Applicant at the preferred route alignment stage, as presented in the CPRSS Appendices [REP1-068], do not constitute a sufficiently detailed and robust assessment of the eastern and southern alternative route and its relative merits compared to the Preferred Route.
9. During the course of the Examination to date, the Applicant has not presented any further evidence or additional assessments for its original conclusions. It simply states (including in this comment on our REP5-260) that providing further detail is unnecessary and that the alternative route has been carefully considered and constraints documented. The Group understands this is the Applicant's position but simply re-stating it is not the same as presenting detailed transparent evidence to support or justify it. This matters because of the number of residual significant adverse landscape and visual effects which arise as a result of the western Preferred Route. The Group therefore concludes that no secure justification for the western Preferred Route or robust comparison with relevant alternatives have been set before the ExA.