Written |Objection to Proposed Norwich to Tilbury Project

Background

Hapton is a small rural community with many footpaths that all parishioners use to walk their dogs, ride their horses and ramble along. One such path is BR1, that is on the route the Pylons would take, and this vital asset will be completely decimated by these proposals.

Tharston and Hapton Parish council are a fully green council in all aspects of the work it undertakes, using local suppliers, ensuring emissions and travel are kept to a minimum.

Air Quality and Emissions

The construction of the pylons would not only bring unwanted extra traffic to our very small rural roads but also the extra emissions from the large lorries required would bring major concerns over meeting our green agenda.

Alternatives

Tharston and Hapton Parish Council ask that undergrown cabling is considered as they feel this is the best option moving forward and would not hinder local areas and wildlife.

Biodiversity, ecology, and nature conservation

The Parish council puts lots of thought into its local biodiversity planning and feels that, for the reasons I will detail, this scheme is not suitable for our small rural community.

It also has some very rare birds, bats and an owl colony that can be seen flying around the area during the stunning sunsets that regularly occur.

It is inevitable, therefore, that the infrastructure needed to put the pylons in place will decimate the local area and wildlife around our many footpaths and small country roads that would not take the heavy traffic needed to install the pylons and also maintain them.

Historic Environment

Tharston and Hapton parish council has many old trees in the parish, some of which are on the lines the pylons route will take, and these would be lost to the area should the construction take place. Further, with size of the construction lorries needed, local housing that has been in place, in some cases for centuries, would suffer from the extra-large traffic.

Health and wellbeing

We have built a community project adjacent to the proposed route to help with parishioners' ability to enjoy the countryside; enhance children's play, especially after the covid pandemic, and more importantly, improve everyone's mental health with a great out door facility, The area is widely used by many – including from outside the parish - and this resource would be severely undermined by the installation of the pylons and its associated infrastructure. Not only this, but the local wildlife habitats also that have built up as a consequence of the work we have done will be destroyed.

Land Use

With the parish being a predominantly farming area the land that will be lost to this construction and the knock-on effects to farming practices will be lost along with the damage to the soil from lack of soil management procedures, which will take many years to recover

Transport and Traffic

Tharston and Hapton Parish have and are still suffering from large lorries using the area as a rat run, causing local parishioners, walkers, horse riders along with local car drivers many issues with having to move over to accommodate the large vehicles on what is a C road, which falls well within the Government's own definition of an unsafe route. These even larger lorries would not be able to use this road into the parish to start construction.

Holford Rules

The Parish Council are aware that the current planning application does not meet The Holford Rules as in Rules attached

Rule 1: Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is somewhat increased in consequence.

Note on Rule 1 Investigate the possibility of alternative routes, avoiding, if possible, the areas of the highest amenity value. The consideration of alternative routes must be an integral feature of environmental statements. Areas of highest amenity value are Areas of Outstanding Natural Beauty National Parks Heritage Coasts World Heritage Sites

Rule 2: Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, i.e. the more massive structures which are used when lines change direction.

Note on Rule 2 Some areas (e.g. Site of Special Scientific Interest) may require special consideration for potential effects on ecology (e.g. to their flora and fauna). Where possible choose routes which minimise the effects on the setting of areas of

architectural, historic, and archaeological interest including Conservation Areas, Listed Buildings, Listed Parks and Gardens and Ancient Monuments.

Rule 3: Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers.

Note of Rule 3 Where possible choose inconspicuous locations for angle towers, terminal towers and sealing end compounds.

Rule 4: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees. Rule

5: Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees.

Note on Rules 4 & 5 Utilise background and foreground features to reduce the apparent height and domination of towers from pan viewpoints. Minimise the exposure of numbers of towers on prominent ridges and skylines. Where possible avoiding cutting extensive swathes through woodland blocks and consider opportunities for skirting edges of copses and woods. Protecting existing vegetation, including woodland and hedgerows, and safeguard visual and ecological links with the surrounding landscape.

Rule 6: In country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires, and cables, so as to avoid a concentration or ‘wires cape’.

Note on Rule 6: In all locations minimise confusing appearance. Arrange wherever practicable that parallel or closely related routes are planned with tower types, spans and conductors forming a coherent appearance; where routes need to diverge, allow where practicable sufficient separation to limit the effects on properties and features between the lines.

Rule 7: Approach urban area through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, go carefully into the comparative costs of the undergrounding, for lines other than those of the highest voltage.

Note on Rule 7 When a line needs to pass through a development area, route it so as to minimise as far as possible the effect on development. Alignments should be chosen after consideration of effects on the amenity of existing development and on proposals for new development. When siting substations take account of the effects of the terminal towers and line connections that will need to be made and take advantage of screening features such as ground form and vegetation.

The Horlock Rules

The parish Council are also aware that National Grid do not conform to The Horlock rules as summarised below

Core Principles of the Horlock Rules (Simplified)

1. Ownership Restrictions

- Electricity generators could not control National Grid.
- Shareholdings were limited to prevent dominance by any single generator.

2. Board Independence

- A majority of National Grid's board had to be independent.
- Non-executive directors could not be closely tied to generators.

3. Operational Neutrality

- National Grid had to provide **non-discriminatory access** to the transmission system.
- Equal treatment of all generators.

4. Regulatory Oversight

- The company operated under oversight from the UK energy regulator (now Ofgem).

Why They Mattered

The Horlock Rules helped:

- Promote fair competition in the newly liberalized electricity market
- Prevent conflicts of interest
- Support market confidence during privatization

They were part of the broader UK electricity market reforms following the Electricity Act 1989.

In **One Sentence**

The Horlock Rules ensured that National Grid operated as an **independent and neutral transmission system operator**, even though it was originally owned by regional electricity companies and linked to former state utilities.

Finally, as stated in our clerk's oral submission, the planning inspectorate meeting fell between our Jan and Feb Parish Council meetings, which is disappointing. As confirmed

at the time, this document constitutes our written objection, and we ask that you do a site visit to see the area and look at the issues we have detailed in this report.

Thanks for listening

[redacted] PSLCC

Parish Clerk and RFO

Tharston and Hapton PC