

## Palgrave Parish Council response to Norwich to Tilbury Pylons /Trenching Statutory Consultation 2024.

Palgrave Parish Council objects strongly to the current proposals for overhead pylons through the most beautiful parts of our parish, some of which will be sited on the highest point for miles around and will therefore be visible to all parishioners going about their daily lives. The visual impact will have a huge bearing and we seek to have these put underground until they pass Palgrave. Whilst we are supportive of green energy, we already have major infrastructure projects on the outskirts of Palgrave with one solar farm already permitted and a decision awaited for another adjacent to it in the next field. With the proposed N2T pylons running down the middle of these two solar farms, any reasonable person would consider this to be excessive, unnecessary and extremely unfair for a small village to contend with. The energy required within Essex, Suffolk and Norfolk is, according to the ESO report, very low, and the need does not lie within these communities for more power. Yet they have to be blighted by your proposals to provide energy for London and the South.

### 1. **OBJECTION TO SCHEME.**

While accepting the need to move power from the North Sea to London, Palgrave Parish Council objects to the National Grid Norwich to Tilbury pylons proposal. This is on the basis of the arguments set out by the Essex Suffolk Norfolk Pylons action group, whose submissions, including to this Statutory Consultation, we endorse.

Consultation has been, and remains inadequate; valid alternatives with less negative impacts have not been adequately presented and considered.

There are alternatives, which have been assessed in the ESO East Anglia Network Study, and in particular we would point out that Option 8: Onshore HVDC comes out very strongly relative to the Pylons (Option 3). In particular Option 8 is assessed as having

- superior environmental ranking to Option 3, with all other rankings equal (see Section 7 of ESO study).
- Lower constraint costs than Option 3 in two of National Grid's Future Energy Scenarios (Table 6, ESO Study), and the overall lowest constraint costs averaged across all scenarios (£281m vs £600m for Option 3).

We note that the NGET response to the ESO study dismisses the Community Sentiment aspect of the former as being "not part of the HND methodology" (P4). It is not acceptable to dismiss Community Sentiment in this way, especially when the ESO study shows all but one of the 9 options studied are superior to NGET's default Option 3 (which is rated red for Community in Section 7) in this respect.

We also believe that the construction traffic that will enter the village from Lion Road will have a long lasting and serious effect on our road network, noise, construction disturbance for many years. What does National Grid intend to do to mitigate the effects of this? If this goes ahead, serious advice needs to be taken into account about construction traffic using the A143 / Lion Road access which is a very tight bend and prone to flooding.

2. **The visual impact** of these 50 meter high pylons on an area that is arguably the highest point of the surrounding countryside in amongst one solar farm already approved and a possible second solar farm awaiting a final decision, is simply disastrous for the village of Palgrave.

**Environment, habitat, species:**

With habitat already in danger of being compromised by the Grange Farm Solar Farm, these pylons will only further affect and impede the movement of the abundant and various wildlife that lives in the area. We currently enjoy roe deer, muntjacs, hares, badgers, and many other wildlife species in the area. Breeding birds, reptiles, hazel dormice, water voles, hares, stag beetles, Great Crested newts and hedgehogs all live within this habitat. We are trying to reclaim wildlife and biodiversity, not build infrastructure that may cause harm to them. There are also a large number of roosting bats within the mature trees surrounding the proposed route.

**Heritage:**

Substantial harm is predicted to be caused to the heritage asset, Valley Farmhouse, already in danger from the Grange Farm Solar Farm. Palgrave residents are passionately striving to safeguard their precious heritage assets. The community views the damage that will be caused by even more unsightly infrastructure as a deeply disheartening setback in their efforts.

The siting of the proposed pylons so close to a village with a large conservation area and many listed buildings is bound to have a huge effect on the setting of extensive 'assets'. Valley Farmhouse would not be alone in experiencing substantial harm from the pylons. Other asset settings would be substantially harmed by the visual impact so close to the village whilst views of the Grade I listed St Peters Church in Palgrave from Millway Lane would be severely compromised and its setting significantly affected.

Palgrave has many listed buildings: The Grade 1 listed St. Peter's Church is the oldest surviving building in Palgrave. Its tower and chancel arch date from the early 14th century and the original church is probably beneath the existing building. Views across the sweeping landscape from the church tower would be severely impacted by the proposed pylons.

There are numerous Grade 2 listed buildings within the village. There are too many to list individually but we have a detailed list of 37 buildings dating back as far as the 15<sup>th</sup> Century. Many visitors enjoy a historic trail around the village to view these houses, so pylons on our doorstep would impact on local tourism and the benefits of visitors spending power.

**Landscape:**

Palgrave is part of the landscape of the East Anglian Plain, an undulating plateau area spanning much of Suffolk and Norfolk, developed on a thick sequence of glacial deposits. This plateau is dissected by river valleys, and from a landform point of view, Palgrave is part of the Waveney river system and the Waveney Valley, which incorporates The Angles Way, a 227 mile 'Around Norfolk Walk' created by the Ramblers Association. The delicate ecology of this area of marshland and woods, which lies directly beneath the realigned pylon route, will be compromised not only by its construction but also by its ongoing operation. The abundant bird life which inhabits this floodplain will be placed under severe threat.

Wortham Ling, a 53.2 hectare (131-acre) biological SSSI in Suffolk, with undisturbed, rare, acid grassland and dry heath on a sandy soil which needs to be preserved, lies just west of Palgrave. It is an area known and enjoyed locally for its wildlife and habitat. It lies just to the southwest of Roydon Fen LNR. The proposed pylon route lies between the two. This low lying heathland is an environmentally important asset for botany and biodiversity and provides a significant visual amenity. Redgrave & Lopham Fen Ramsar site, an internationally important wetland of which there are only 71 in England, lies just 1.5 miles to the west, adding to an essential wildlife corridor of designated habitats. The overall impact on the area will change the landscape forever.

The village itself, which is bounded on the north by the river Waveney, separating the counties of Norfolk and Suffolk, would also be spoiled by the proximity of pylons.

**Proximity to houses or businesses:**

We have one resident in particular whose home will be dwarfed by a 50 metre high pylon that will be sited within 50 yards of his home. Added to the impact of the solar farm already approved, and his house will only decrease in value if he can ever sell it at all. This particular resident is suffering from extreme anxiety as a result.

The proximity to the village as a whole is unprecedented and will affect every single house and resident due to the sheer size and location of the proposed pylons.

**Public Rights of Way:**

We have already mentioned The Angles Way ramblers route above. Palgrave is surrounded by many beautiful walks and Millway Lane in particular will be severely impacted by these towering pylons. This is a designated Quiet Lane, known and enjoyed by many walkers each and every day.

The proposed site is within easy walking distance of the village school and the children regularly attend the local 'Forest School' on Millway Lane. Many opportunities for education will be missed as both Millway Lane and Priory Wood are significant areas used by the school and residents alike. Unrestricted views over undulating farmland will be lost.

**Breaches of Holford Rules:**

We believe there are several breaches to the guidelines on overhead line routeing, first formulated in 1959 by Sir William later Lord Holford, who was a part-time member of the CEGB. They are known as the 'Holford Rules'. National Grid continues to employ them as a basis of the company's approach to overhead line routeing.

**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.: - Wortham Ling and Millway Lane are both equally high areas of local amenity value. Both will be impacted by the proposed route.

**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, ie the more massive structures which are used when lines change direction. Where possible choose routes which minimise the effects on the setting of areas of architectural, historic and archaeological interest including Conservation Areas, Listed Buildings.; - Palgrave is in a Conservation Area and is awash with historic buildings as already detailed.

**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.: - The route will site 50 metre high pylons on some of the highest points of land in the surrounding countryside, which will be clearly visible for many miles around.

**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:- This is clearly not the case as already detailed in 4 above.

### 3. CONSULTATION

- Consultation meetings have all been timed for during the working day, denying working people the chance to have their say. There have only been 2 local ones to Palgrave, in Diss and Needham Market (which is a 36 mile round trip away), both of which were 1-6pm. We appreciate that you have hosted some webinars, one of which was attended by our clerk. The general feeling was that they were not open to discussion apart from the text chat facility, not all questions were answered as a result, and participants felt it was a 'done deal' as also expressed below.
- NGET has failed to give local residents any faith in the process – most have been left with the impression that their views will be ignored and that the “deal has been done” behind closed doors.

### 4. MITIGATION

Whilst having made very clear our disapproval of NG's consultation processes to date, including this one, and of the proposed scheme, in the event that the N2T project gains approval, we seek the following mitigations:

1. The current plan (Waveney Valley Alternative) envisages underground cables passing Wortham Ling, but then emerging near Millway Lane, in one of the most scenic parts of the parish and very close to Wortham Ling. Undergrounding should therefore continue until the southern edge of Palgrave where it meets the A143. This would continue the proposed Waveney Valley Alternative by just over 1km more to ensure the surrounding landscapes are less affected. We also note that under-grounding is, according to the ESO report subject only to moving the date within NG contract (to take electricity from the yet to be agreed / approved pylons) from 2030 to 2034 / 2035. Full, detailed and level playing field cost comparisons have not been undertaken by NG; in particular offshoring and under-grounding. We refer again to the ESO report Option 8 which states it would be a valid choice if the date was extended to 2034.
2. We believe National Grid must take mitigation action to reduce the impact of Construction traffic to the proposed route coming in from Lion Road. This will impact heavily on the village and must be taken into account. There must be a clear exit route in place with construction traffic forbidden to turn left towards Palgrave. What is the anticipated volume of traffic movements per day / weekly?

Whilst the Waveney Valley, and Palgrave within that, is not a nationally designated landscape as set out in NPS EN-5 paragraph 2.9.20, the area was formerly identified (in the local plan) as a Special Landscape Area. Effects would arise from new infrastructure in the landscape. In addition, the setting of a Grade I listed building (St Peter's Church) extends from the heart of the village across the rolling plains valley to the agricultural hinterland and would be affected by a new overhead line. The valley, including the adjacent SSSI are used extensively for recreation with a long-distance path the Angles Way (established by the Ramblers Association), crossed by the 2023 preferred draft alignment adjacent to RG087”