

FAO. The Planning Inspectorate, Norwich to Tilbury Project.

Planning Application No: EN020027

I am writing on behalf of the Lazell household to register my comments in relation to Appendix 'A', Action Point 27, Waveney Valley (including Snow Street, Roydon Fen and Wortham Ling) – Draft Constraints Plan. I will take each point in turn in numerical order as set out in the text accompanying the map on page 10 of the plan.

1. As admitted, the PRoW network north of Snow Street will suffer from widely open and uninterrupted views of several pylons. Indeed, pylon RG80 will stand directly facing anyone walking along the public footpath heading north from Snow Street, completely dominating the skyline.

2. Agreed.

3. This is untrue. The view east from the 'Fen Railway' does indeed include vegetation, but this is not high enough to fully 'filter' the unfolding view of pylons RG85, 86 and 87. As trains progress in an easterly direction and then northerly around the curved track, passengers in the open carriages will be subjected to an inescapably obstructed skyline. Pylon RG85 will lie some 275 metres directly ahead, with RG86 approximately 300 metres further on and RG87 more distant. As trains round the curve, pylon RG84 will loom ahead and to the right at a distance of some 330 metres, although this may be partially obscured by vegetation during the summer months only. As can be easily envisaged in the photograph – pylon RG85 would stand almost directly ahead of the locomotive, its full height of 50 metres clearly visible, along with its supported cables on either side dominating the skyline.



4. Removal of any vegetation in this ecologically sensitive location is unacceptable. Reinstatement will inevitably take a long time to mature. Visitors to this important heritage asset (Bressingham Steam Museum & Gardens) have the right to enjoy its tranquil rural setting and unblemished valley views.

5. Again, it is disingenuous to claim that "Layers of vegetation filter views" when in fact so much of it is at ground level and therefore cannot possibly obscure such prominent structures as 50 metre-high pylons.

6. Agreed.

7. The proposed WaLOR project to reinstate the natural fenland as part of a future flood prevention scheme cannot possibly be compatible with the installation of either concrete bases for pylons or indeed with underground cabling. This alone must clearly indicate that the proposed transmission line should ideally be located offshore, or at least redirected to the east of Diss, adjacent to the existing overhead line.

8. The project would indeed be visible from parts of Wortham Ling, with claimed 'vegetation filtration' having a very limited effect. This SSSI will remain irreparably damaged by the installation of pylons in its close proximity and no amount of 'tree planting opportunities' will mitigate this. In fact, Wortham Ling's status as a SSSI is based largely on its landscape of 'dry heath and open heathland' and it is doubtful that Natural England would permit the planting of trees in any event. This effectively renders the accompanying 'Draft Opportunities Plan' invalid.

9. This is a fallacious statement, risible in the extreme and absolutely typifies National Grid's total absence of any concern for rural environments or heritage assets. It pays scant regard to the high level of visual harm that will be inflicted upon Roydon Fen LNR, Wortham Ling SSSI, Roydon Church or all the other view points around the valley. Yes, the project does indeed cross the shallow River Waveney Valley obliquely and whilst the cables will not pass directly over Roydon Fen or Wortham Ling, they will nonetheless pass through the narrow gap (approx. 315 metres) between the two designated areas. As such, despite being referred to as 'constraints', both will be subjected to unmitigated and unfiltered close visual damage.

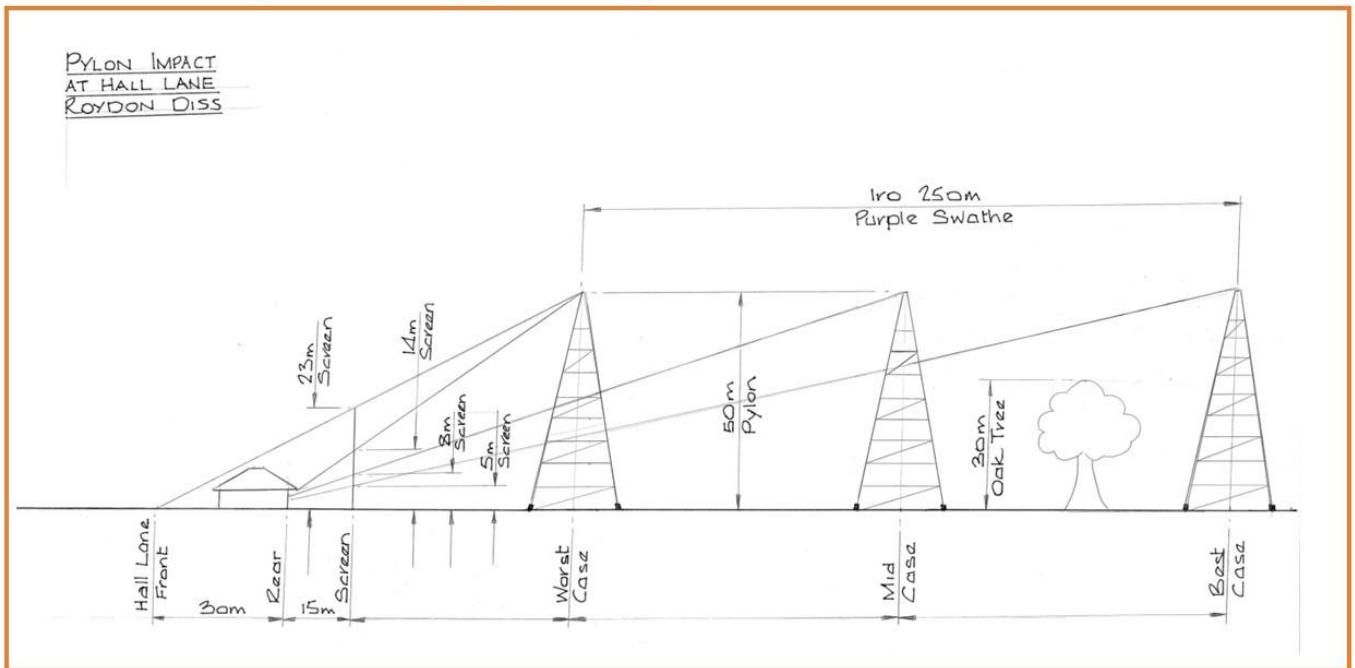
Despite National Grid's claim in bullet point 9 that this deviation is in accordance with Holford Rules 2, 4 & 5, this is not entirely true. Rule 2 states, **"Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, ie the more massive structures which are used when lines change direction."** The convoluted passage of these pylons across the wider Waveney Valley involves no less than 7 direction changes and associated 'angle towers'. Rule 2 further states, **"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)."** Clearly, there is no meaningful 'special consideration' being afforded in this case.

10. Again, the Holford Rules are not being adhered to. Roydon's Grade I Listed church of St Remigius enjoys a panoramic view across the valley from its elevated position on the northern slope. Notes on Rule 2 state, **"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."** Pylons RG85 to RG92 will be plainly visible from the churchyard – indeed they will dominate the entire view to the west and south. This photograph shows the view from the church to the southwest across the Waveney Valley. The pylons will pass from right to left in the near distance, creating a devastating domination of this pristine landscape and its fragile ecology.



11. Whilst this claim of 'largely filtered and screened views' may be partially true in respect of some (but not all) properties to the north of the A1066 Roydon High Road, this is not the case for many of those lying to the south of this major access route between Thetford and Diss. Nor is it true in regard to properties lying on the western side of Hall Lane, Roydon, which has been omitted from this 'Constraints Plan' altogether, for some unknown reason. This lane runs in a southerly direction from the western end of Snow Street, parallel and adjacent to pylons RG82 – RG84 at an average distance of around 180 metres, with the closest property being a mere 115 metres from the pylon line. A sightlines diagram, centred on this property is included in this submission, which clearly shows that 'vegetation filtration' is entirely dependent on both height and distance, is seasonal and locally variable over just a few metres. It is not always a reliable defence against visual harm caused by dominant and intrusive high structures.

Can you hide a pylon? Sight lines calculated from a house.



Summary. In the same way that the AONB that is Dedham Vale is deserving of an alternative to pylons and overhead transmission lines, so must be the SSSI of Wortham Ling, the LNR of Roydon Fen, the wildlife corridor along the Waveney Valley, the Grade I Listed Roydon Church and the numerous Grade II Listed residential properties which abound in this area. Indeed, National Grid (NG) recognised the environmental, ecological and historical importance of this area when it proposed “The Waveney Valley Alternative” of undergrounding for a short distance across the central part of the valley. Once it was realised that the proposed 2 km length was woefully inadequate to fully mitigate the threatened harms and that at least 8.5 km was needed (from pylons RG75 – RG102) if the safety of Wortham Airstrip was also to be preserved, the plan was quickly dropped, without any consultation process being offered. This was proof – as if any were needed – of NG’s arrogant disdain for the people and wildlife who call this valley ‘home’. The proffered excuse of “unsuitable soil conditions” was treated with considerable scepticism.

It is noteworthy that there is no mention in bullet point 4 of the ‘Constraints Plan’ of the impact the pylons will have (particularly RG85) on the ‘Heron Meadow Centre’. This relies heavily on its natural setting in the valley to provide its healing and learning functions, thus is highly likely to face closure should either pylons or a short section of underground cabling be installed. Again, this harsh fact lends weight to the argument that the existing transmission corridor to the east of Diss should be utilised, preferably by underground HVDC cabling or at worst, by pylons to be constructed at a safe distance from the existing line. Due to its proximity to the A140 trunk road, this option would obviate the need for a great many of the proposed ‘haul roads’ needed for the construction phase and also provide easier access for maintenance during the operational life of the line. Why this appears to have not been seriously considered is a great mystery to many, given that so much of the required infrastructure is already in place. It would certainly meet with far less objections and probably prove to be the least costly option.

To conclude this submission, the importance of preserving the Waveney Valley, its numerous natural features and surrounding countryside in its present condition, along with the human and wildlife communities which populate it cannot be overstated. To effectively surround Roydon on three sides with 50 metre-high lattice steel monstrosities, to the total exclusion of all the alternatives and in direct contravention of the ‘Holford Rules’ and ‘Treasury Green Book’ would be an act of Government-sanctioned vandalism. It is incumbent therefore upon His Majesty’s Planning Inspectorate to protect this corner of our green and pleasant land, not just for us but for the generations to come.