

Written Representation – Deadline 6

Planning Inspectorate Reference EN020027 – Norwich to Tilbury

Interested Party Reference [REDACTED]

Response to National Grid's Document 8.4.12.2 (Response to ISH2 Action Point 27 – Masterplans),
Appendix A – Waveney Valley, including Snow Street, Roydon, Roydon Fen and Wortham Ling

Submitted by: [REDACTED] – resident, Roydon, Norfolk

4 August 2026

I am writing as a resident of Roydon in response to National Grid's Document 8.4.12.2, and in particular Appendix A, which covers the Waveney Valley, Snow Street, Roydon, Roydon Fen and Wortham Ling. This is the document National Grid produced in answer to Action Point 27, which the Examining Authority raised because it accepted that Roydon and this stretch of the Waveney Valley are affected badly enough by the Project to need a proper masterplan and an agreed position on compensating for what is left behind once the harm can't be avoided.

National Grid's own document admits, at paragraph 2.8.4, that no agreed position has actually been reached. It is now nearly three months since Deadline 5, and what Roydon has is a set of constraints marked on a map and some "opportunities" that National Grid itself describes as unfunded and undelivered. Nothing has been secured. No landowner has been approached, let alone agreed to anything.

I want to set out, in this response: why the route runs through Roydon at all rather than somewhere else; what is actually here — the church, the listed buildings, Roydon Fen, Wortham Ling, Darrow Lane — and why it matters to the people who live here; the community's own survey, which tells the Examining Authority far more than National Grid's own document about what local people think; my own point-by-point response to the eleven numbered points on National Grid's constraints plan and the accompanying opportunities plan; and finally, whether National Grid can really say it has followed the Holford and Horlock Rules here, because I don't think the evidence supports that.

Why the route runs through Roydon

This is not the route National Grid originally preferred. During its 2022 consultation, the preferred corridor ran further west of the village. National Grid's own Corridor Preliminary Routeing and Siting Study records that the route was moved out of that 2022 corridor mainly because of a planning application (2021/0612) for a care and wellbeing business, and that a more westerly "Blue" corridor was ruled out because it would run alongside an SSSI with a water-meadow environment.

The move away from that western corridor is also connected to concerns recorded near Bressingham Steam Museum, whose two heritage railway lines crossed the earlier route. The museum's curator, [REDACTED], said publicly: "The proposed route of the pylons will cross two of the museum's railways. There would be serious implications for the future sustainability of the museum if a pylon was to be erected directly on or next to our railway lines. These railways are an important part of steam preservation and Norfolk heritage." I set this out as part of the documented history of the route, not as any criticism of the museum, which was entitled to raise its own concerns like any other affected party. A resident's written representation to this Examination (EN020027-001344) records that a National Grid representative confirmed at a July 2023 consultation event that the route changed for these reasons.

What that meant for Roydon, in National Grid's own words as quoted in the same representation, was “transferring negative impact from St Mary[’s] Church to St Remigius” — moving harm from one Grade I listed church onto another — while increasing the effect on recreational use and the main access to Wortham Ling, and threading the line through a narrow gap between Roydon Fen and Wortham Ling.

I raise this because it matters to how Action Point 27 should be judged. The route through Roydon has never been National Grid's preferred choice. There have now been three separate proposals for this section — the original 2022 corridor, the current alignment, and the Waveney Valley Alternative, which was offered, discussed with residents, and then withdrawn. Of the three, the route now proposed causes the most harm to Roydon and to the surrounding environment, and neither the constraints plan nor the opportunities plan offers anything that would offset those losses for the village. National Grid has never published its reasoning for any of these route decisions, despite residents asking for it directly and in writing.

What is actually here

St Remigius Church, Roydon, is Grade I listed (National Heritage List for England entry 1050237, first listed 7 December 1959) — a Norman nave and round tower, a 13th/14th-century chancel, and a large 15th-century north porch with flushwork panelling. It is one of Norfolk's round-tower churches and stands above the Waveney Valley.

At the Examination hearing, a Historic England representative told the Examining Authority: “The pylons will dominate. I think it's not too strong a word — a word I would very rarely use — but they would dominate that and I don't think that's given due weight here. I think we feel the level of harm given to the church from development in its setting is understated.” Historic England's written representation adds that the pylons “compete with the tower in scale and detract from its prominence,” and that National Grid has looked at views from the churchyard but not at the impact on views of the church from across the valley — which is how most people actually see it.

Around the church, Roydon has a real concentration of listed buildings: Snow Cottage (List 1050240), Roydon Hall (List 1373311, listed 26 June 1981), Glebe Farmhouse (List 1329809), Limetree Farmhouse, Firtree Farmhouse and The Hermitage — all Grade II on Snow Street — the terraces at 20–21 and 22–23 Snow Street, and the Grade II War Memorial (List 1455938) in the churchyard. On Darrow Lane itself stands The Gables (List 1373310, first listed 7 December 1959) — a 17th-century timber-framed house with the remains of a moat, right on the same lane National Grid's own Point 1 admits has no meaningful screening.

South of the village is Roydon Fen — a 17.2-hectare Local Nature Reserve and County Wildlife Site, owned by South Norfolk Council and managed with Suffolk Wildlife Trust since 1994. It is spring-fed fen with marsh helleborine, marsh fragrant orchid and glow-worms, and flint tools around 10,000 years old have been found there. Beyond it is Wortham Ling, a 53.2-hectare biological SSSI (Natural England reference 1005979) of acid grassland and heath, home to skylark, woodlark, nightjar and grayling butterflies — common land preserved, essentially, because it was never good enough to plough, and valued now for exactly that reason.

Darrow Lane and Darrow Wood Lane, along with these two sites, are not separate features. Roydon's own Neighbourhood Plan evidence describes a deliberate corridor linking Roydon Fen, Quaker Wood, Brewers

Green, Baynard's Green and Wortham Ling — the same places this route crosses or runs beside. National planning policy backs this up directly: the National Planning Policy Framework says that “access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities” (paragraph 103), and that rights of way should be protected and enhanced (paragraph 105). This is not a marginal amenity. It is exactly what national policy says should be protected.

The Waveney Valley Alternative, and what local people actually said

The Waveney Valley Alternative was National Grid's own defined option to put around 2 km of this section underground instead of on pylons. National Grid has withdrawn it: its published position states, “For the avoidance of doubt, the alternative design at the Waveney Valley (referred to as the Waveney Valley Alternative) is not being proposed and does not form part of the Project.” The reasons given were ground conditions and cost, “with a requirement to keep costs as low as possible for the bill payer.”

Suffolk County Council's deputy cabinet member for nationally significant infrastructure, [REDACTED], called the decision not to underground any of the line through the Waveney Valley “contemptible,” and warned it would “wreak untold damage” on the landscape. [REDACTED], the Green MP for Waveney Valley, said it was “incredibly disappointing” that National Grid had “renege” on an earlier commitment to bury cabling around the River Waveney. The Waveney Valley Valued Landscape Assessment, commissioned by Norfolk and Suffolk County Councils and published in April 2024, formally recognises the area as a valued landscape.

Because I wanted the Examining Authority to hear directly from the people who actually live here, a group of us in Roydon organised and paid for our own survey on the Waveney Valley Alternative. It was not run by National Grid or any public body — just residents. We went letterbox to letterbox, to every household close to the pylon route in both Roydon and Bressingham, and held two in-person sessions, one at Roydon Village Hall and one on Darrow Lane, so people could fill it in there and then. We sent the full set of results to National Grid as part of the Waveney Valley Alternative consultation.

Of 500 surveys handed out, we had 479 responses back — a 95.8% response rate — across eight questions. The results were:

- 93% supported the Waveney Valley Alternative and undergrounding through this section.
- 469 of 479 (98%) said they enjoy and use Darrow Lane.
- 474 of 479 (99%) said they enjoy and use Roydon Fen.
- 471 of 479 (98%) said they enjoy and use Wortham Ling.
- 82% had not been to a National Grid consultation roadshow — for the same reasons anyone misses an event: health, mobility, work, childcare, or simply not having the time.

This is not a substitute for National Grid's own consultation. It reached people directly in their own homes, including residents who for ordinary reasons hadn't managed to get to an event. The strength of the response — essentially the whole village saying they use and value Darrow Lane, Roydon Fen and Wortham Ling — shows these are not background landscape. They are used, every day, by nearly everyone who responded.

Going through National Grid's constraints plan, point by point

National Grid's Appendix A sets out eleven numbered points on its Draft Constraints Plan. I have gone through all of them.

Points 1 to 3 cover the northern approach, around Snow Street. Point 1 admits there are “few hedgerows/field boundary trees” north of Snow Street — in other words, National Grid's own document accepts there is nothing to screen the pylons along this stretch. Point 2 confirms the Project will be visible in close views from Snow Street itself, which is the historic heart of the village described above. Point 3 notes that views east from Bressingham Steam and Gardens are filtered by vegetation — which tells you mitigation has been actively thought through for the museum, a site connected to why the route changed in the first place.

Point 4 says vegetation removed during construction will be reinstated under a couple of cross-referenced management plans. What it does not say is what will actually be planted, where, how dense, or how long it would take to grow — and it says nothing about whether any of this would do anything for the tower nearest the village, RG85. As it stands, this is a generic reference to a plan, not a specific answer to a specific problem.

Point 5 says layers of vegetation, including woodland in the valley, filter views. I know this stretch of ground, and that is not what is there. There are no properties in front of or behind this section, and no woodland to filter anything. From the village, this stretch offers no cover at all.

Points 6 to 8 all concede visibility without offering anything in return. Point 6 admits the Project will be visible from part of the Angles Way — an ancient route above the valley that is well used by walkers — but proposes nothing to address it. I have looked at the Holford Rules and they do not contain a specific rule about named footpaths or trails; the closest is Rule 2, which requires high-amenity areas to be avoided by deviation. No deviation is offered here. Point 7 refers to the Waveney and Little Ouse Recovery project (WaLOR) as though it were relevant mitigation. It is not National Grid's project. It is an existing, independently funded DEFRA scheme, run by Suffolk Wildlife Trust and the Environment Agency, covering over 1,600 hectares between Diss and Thetford, still in its development phase, aimed at river and fen restoration — nothing to do with landscape or visual harm, and nothing National Grid is funding or delivering. Point 8 concedes visibility from parts of Wortham Ling, a nationally protected SSSI, again without proposing anything specific.

Point 9 claims the pylons are sited to minimise effects on Roydon Fen, Wortham Ling and St Remigius Church “in accordance with Holford rules 2, 4 and 5.” I deal with that claim properly below, because I don't think it stands up.

Point 10 is worth quoting in full, because that is all it says: “Grade I Listed church of St Remigius.” That's it. Every other point on this plan has a sentence describing the effect and what, if anything, is proposed. Point 10 doesn't. Having checked National Grid's own reference map, pylons RG85, RG86 and RG87 sit directly in view of the church — both looking from the valley toward the church, and looking from the church out across the valley. National Grid offers nothing here to protect either view, even though this is exactly the harm Historic England raised at the hearing. By contrast, National Grid's own wider Environmental Statement gives Bressingham Steam Museum a dedicated numbered viewpoint, Viewpoint 1.19, with its

own photomontage (Figure 7.12.F19). Appendix A itself gives Bressingham Steam and Gardens a full sentence at Point 3. St Remigius Church, the higher-graded heritage asset of the two, gets a bare label.

Point 11 says views from within Roydon are “largely filtered and screened by existing buildings and vegetation.” That does not sit alongside Points 1, 5 and 9, which all concede open, unscreened views, and it does not sit alongside what nearly the whole village told us in our own survey.

The Draft Opportunities Plan

I have looked at the accompanying opportunities plan against what is actually at stake here — the heritage, the protected sites, the amenities — and there is very little in it for Roydon.

The stretch from roughly RG81 down to RG75, across open, flat fields, matches exactly what Point 1 already admits: no screening. And there is nothing marked as an opportunity anywhere along that stretch. Equally, nothing at all is shown along the back of Baynard's Green and Snow Street, which is where the impact on the historic core of the village is felt most.

Where opportunities are shown, several sit in the middle of fields that are actively farmed — marked as “links to Local Nature Recovery Strategy areas” or “connective green infrastructure enhancements.” National Grid's own document says, at paragraph 2.6.1, that no discussions have yet been held with the relevant landowners. So there is no reason to think any farmer has agreed to any of this. It's a drawing on a map, not an arrangement with anyone who owns the land.

Nor does the plan deal with the change of direction in the route east of Wortham Ling. This has been reported as a 90-degree turn as the alignment comes down from the area of Doits Lane into the Waveney Valley floor — National Grid's own Route Drive Site Visit Guidance Document confirms the alignment crosses ‘The Doit’ at this point. A turn like that needs an angle tower — exactly the kind of more massive structure Holford Rule 3 says a route should avoid by staying as direct as possible. National Grid's plan says nothing about this. Suffolk County Council has raised the same principle elsewhere on this route, at Gislingham, where the alignment changes direction four times and crosses Burgate Road twice; the Council's own representation to this Examination states this “is likely to result in significant adverse effects and disbenefits for the visual amenity along this route, which is used for recreation.” The same reasoning applies here.

The plan also marks an area between Roydon Fen and Wortham Ling as an “opportunity to support enhancements proposed by the WaLOR project.” As above, WaLOR is someone else's project, not National Grid's. And at this point the River Waveney is close to its source — it rises a short distance to the west at Redgrave and Lopham Fens and forms the boundary of Bressingham and Roydon before it even reaches Diss. I know this stretch of river, and it is a small headwater watercourse here, nothing like the river further downstream. There is only so much a “blue infrastructure enhancement” can do on a stream this size, and National Grid hasn't said what it would actually pay for or deliver.

More to the point, National Grid's own document admits the whole opportunities plan is draft, illustrative and unfunded, and states plainly that it “would not materially change the ES assessment of landscape and visual effects” even if it were all delivered (paragraph 2.4.1). Most of it sits outside the Order Limits, on land National Grid does not own or control, with no landowner discussions held (paragraph 2.6.1), and delivery would depend entirely on voluntary agreement. On National Grid's own account, this plan is not secured

mitigation, and the Examining Authority should not treat it as protection for Roydon's heritage, landscape or amenities, because National Grid itself does not claim that it is.

Holford and Horlock: applied, or just claimed?

Point 9 of National Grid's constraints plan says the route has been designed “in accordance with Holford rules 2, 4 and 5” to minimise effects on Roydon Fen, Wortham Ling and St Remigius Church. Set against the rules themselves, I don't think this claim holds up.

Holford Rule 2: avoid smaller areas of high amenity value or scientific interest by deviation — including minimising effects on the setting of listed buildings and areas of historic interest, with SSSIs requiring special consideration for their ecology.

The route doesn't avoid Wortham Ling and Roydon Fen. It runs between them, through a narrow gap, and it doesn't avoid the setting of the church either. Threading a line between two protected sites is not what Rule 2 means by avoidance.

Holford Rule 4: choose tree and hill backgrounds over sky backgrounds wherever possible.

National Grid's own Point 1 admits there is barely any vegetation to provide a background at all on this stretch. The rule's central requirement is conceded as unmet in National Grid's own document.

Holford Rule 5: prefer moderately open valleys with woods, where towers appear lower and views are broken up by trees.

This stretch does not meet that description. The towers here are National Grid's own standard height for this project — 50 metres, spaced roughly 350 metres apart. From Snow Street through to Darrow Lane the land is flat, open arable farmland, with no woodland and no landform to break up a structure of that height, and nothing beyond hedgerow-scale trees — oaks and field maples, nowhere near 50 metres — anywhere near it. Approaching the village around RG83 to RG74, the towers are visible from open ground in every direction, with nothing to screen them. The Diss & District Neighbourhood Plan's own Key View 28 describes this same stretch, Darrow Lane, as “one of the few open, agricultural, big sky landscapes in Roydon” — the same absence of cover Rule 5 is meant to guard against.

I want to be fair to National Grid on one point: this section of the route carries no statutory landscape designation — no National Landscape or AONB status of the kind that applies to the Dedham Vale, where National Grid has agreed to underground part of the line. That is a real difference, and I don't think it should be overstated. But it cuts the other way too. Because there is no additional statutory protection here, Holford Rule 5 and National Grid's own routeing judgement are the only real check on where towers of this height and spacing are placed across open countryside like this. On that test, and on the evidence of National Grid's own constraints plan, this stretch does not pass it.

There's also Horlock Guideline 2, which governs where sealing end compounds go and would have applied to the Waveney Valley Alternative, since undergrounding needs extra compounds. It requires such infrastructure to avoid SSSIs “as far as reasonably practicable.” National Grid has never shown that this was properly weighed before the Waveney Valley Alternative was dropped.

But the real problem goes deeper than any one rule. If Holford Rules 2, 4 and 5 had genuinely been applied to avoid and minimise harm here, there would have been no residual effect left for Action Point 27 to deal with in the first place. The Examining Authority raised Action Point 27 precisely because a residual effect was judged significant enough to need an agreed compensation position. National Grid cannot have it both ways — claiming the route already minimises harm through Holford-compliant design, while a year later still owing the Examining Authority a compensation position for harm that, on that account, shouldn't really exist. National Grid hasn't resolved that contradiction, and the evidence above, much of it in National Grid's own words, points to only one of those two positions being true.

None of this is the route National Grid originally preferred in 2022. It is a second-choice alignment, and the one option that would genuinely have relieved the harm at source for Roydon — undergrounding through the valley, the third option on the table — was offered, discussed with residents, and then dropped without the underlying cost and ground-condition evidence ever being published. Measured against its own stated aims of avoiding and minimising harm, this proposal has not met them for Roydon.

What the Examining Authority is being asked to decide

Having gone through National Grid's response to Action Point 27 in full, I do not think the Examining Authority can safely conclude that the current route through Roydon is the least harmful option available, or that the harm to Roydon has been reduced as far as reasonably possible. National Grid's own submission confirms there is still no agreed compensation position, no secured mitigation, and no landowner agreement for most of what appears on the opportunities plan. What has been submitted is not a deliverable package. It is a set of drawings showing what might be possible if third parties agree at some future date, and none of that is currently secured.

I also do not think National Grid has shown that the Roydon alignment reflects proper application of the Holford Rules, for the reasons set out above.

This brings me back to the Waveney Valley Alternative, which I believe remains central to the case for Roydon. National Grid asks the Examining Authority to accept that undergrounding was considered and rejected, on the grounds of cost and ground conditions. I have not seen, within the examination, a clear comparative assessment showing:

- the full engineering basis for rejecting undergrounding;
- the detailed cost difference between the overhead route and undergrounding;
- how heritage harm to St Remigius Church was weighted against that cost;
- how landscape harm to Roydon was weighted;
- why avoiding this level of harm to Roydon was ultimately judged not to be worth it.

This is not only a Roydon concern. At an Examination hearing, Babergh District Council's leader called for a delay to the project so that further options, including fuller undergrounding, could properly be considered and costed, citing serious concerns about the impact on the environment, communities and businesses. That is the same evidence gap I am raising here, made independently by a local authority.

The harm to Roydon does not appear unavoidable. It is the result of National Grid rejecting the one option that would have materially reduced it — undergrounding through the Waveney Valley — without, on the

evidence currently before the examination, showing clearly why that option became unacceptable. If cost was the deciding factor, that should be stated plainly and tested openly, rather than assumed to outweigh harm to a village, its heritage and its protected landscape.

National Grid's own Action Point 27 response accepts that significant residual harm remains at Roydon. The question for the Examining Authority is not whether that harm exists, but whether it was unavoidable. On the evidence currently before the examination, I do not believe National Grid has shown that it was. I would ask that the Waveney Valley Alternative not be treated as a closed matter, and that undergrounding, or further route refinement away from Roydon, remain live options for proper consideration.

Conclusion

Roydon Fen, Wortham Ling and Darrow Lane are not background scenery to be filtered by a hedge, which is how National Grid's constraints plan treats them. They are protected sites and rights of way that are part of daily life here — walked, cycled and used by nearly everyone who answered our survey, and deliberately linked, in the village's own Neighbourhood Plan work, into one corridor running through Roydon Fen, Quaker Wood, Brewers Green, Baynard's Green and Wortham Ling.

I should be precise here, as something I know as a resident rather than something drawn from any document: Roydon is really two parts. The newer part of the village, along the A1066, has street lighting, pavements, the school, the village hall and most of the recent housing. But the part of the village this response is about — the historic core around Snow Street and Baynard's Green, where Darrow Lane runs — has none of that. There is no street lighting and no made-up footpaths through this part of the village. If you want to walk, run or cycle safely here, you use the quiet lanes and the open spaces this part of the village actually has — Darrow Lane, Darrow Wood Lane, Roydon Fen, Wortham Ling. There isn't a better-lit, paved alternative sitting behind them. For this historic heart of the village, they are the amenity, not an optional extra alongside one. I offer that as my own evidence, to sit alongside the survey figures above showing 98–99% of respondents use and value these three places, and alongside the National Planning Policy Framework's own recognition that access to open space like this is a matter of health and wellbeing for the whole community.

This is also the part of the village the route actually crosses. The historic core — timber-framed houses dating from the 17th century, some earlier — sits directly under the alignment, not somewhere alongside it. National Grid has not published exact distances from individual pylons to the listed buildings and homes closest to them, and I think the Examining Authority is entitled to ask for that. I would also ask what is proposed during construction — haul roads, plant, and site access — this close to 17th-century timber-framed buildings, given National Grid's own Outline Code of Construction Practice and Outline Construction Traffic Management Plan (cited above) do not appear to set out anything specific to this part of the village.

Nothing in National Grid's Appendix A or its opportunities plan answers this. By National Grid's own account, the opportunities plan is illustrative, unfunded, doesn't cover the Darrow Lane approach where the pylons are most exposed, and wouldn't materially change the assessed landscape and visual effects even if every measure on it were delivered in full. There is no measure in National Grid's response that would actually reduce the impact of this Project on Darrow Lane, Roydon Fen or Wortham Ling — or on the pattern of everyday life in this village that depends on them.

The Diss & District Neighbourhood Plan, adopted 16 October 2023 and now part of the statutory Development Plan, protects the two Key Views under this section of the route: View 27, across Snow Street's historic core, and View 28, which describes Darrow Lane as “one of the few open, agricultural, big sky landscapes in Roydon.” These are not casual descriptions. They are the community's own assessment, examined and adopted, of what makes this landscape worth protecting — reached years before this route was ever fixed.

I would ask the Examining Authority to conclude that National Grid's response to Action Point 27, as far as it concerns Roydon and the Waveney Valley, does not provide the agreed position on compensation the Examining Authority asked for; does not show that Holford Rules 2, 4 and 5 have genuinely been applied to avoid and minimise harm to Roydon; and has not shown a single measure that would actually reduce the impact of this Project on Roydon's heritage, its protected landscapes, or the everyday village life — the footpaths, the fen, the common land — that a village without the infrastructure of a town depends on.

Sources

1. National Grid Document 8.4.12.2, Response to ISH2 Action Point 27 – Masterplans (AENC-NG-CNS-REP-0366, Final Issue A, June 2026)
2. National Grid's Corridor Preliminary Routeing and Siting Study, as quoted in the written representation of M. Juby (EN020027-001344)
3. National Grid's Design and Access Statement
4. National Grid's published Holford Rules and Horlock Guidelines (nationalgrid.com)
5. National Grid's Route Drive Site Visit Guidance Document (EN020027-000286)
6. National Grid's Environmental Statement, Chapter 13 – Landscape and Visual (EN020027-000408), including viewpoint and photomontage references
7. The Diss & District Neighbourhood Plan and Key Views Assessment (adopted 16 October 2023)
8. Historic England's Examination hearing statement and written representation
9. Historic England's National Heritage List for England (entries 1050237, 1050240, 1373311, 1373310, 1329809, 1455938)
10. Natural England's SSSI citation for Wortham Ling (reference 1005979)
11. Suffolk Wildlife Trust and South Norfolk Council material on Roydon Fen
12. The National Planning Policy Framework (paragraphs 103 and 105)
13. The Waveney Valley Valued Landscape Assessment (April 2024)
14. Reported statements of Suffolk County Council and Adrian Ramsay MP
15. Suffolk County Council's Relevant Representation to this Examination
16. Reported statements of Babergh District Council at an Examination hearing
17. South Norfolk Council's published project information on standard pylon height and spacing
18. Suffolk Wildlife Trust and DEFRA material on the Waveney and Little Ouse Recovery (WaLOR) project
19. Published geographic sources on the course and source of the River Waveney
20. The Diss Express report on the route diversion near Doits Lane, Roydon
21. The resident-organised Waveney Valley Alternative survey (500 households, 479 responses)