

ROYDON PARISH COUNCIL, SOUTH NORFOLK.

Response to National Grid statutory consultation,

Norwich to Tilbury, April to July, 2024.

Roydon Parish Council (RPC) reiterates its responses to National Grid's (NG) 2022 consultation, and subsequent 2023 consultation.

RPC considers that NG must consult on alternatives to its Norwich to Tilbury plan which makes the presumption of extensive use of pylons with little undergrounding. Neither an offshore transmission system nor much more extensive undergrounding have been presented alongside the dominant pylon plan so it is not possible for the public to make meaningful comparisons between the options and, as such, is not being fully transparent in the alternative possibilities for bringing this project to fruition.

RPC wants a pause in the whole process to give time for proper evaluation of all other options other than just the pylons proposed by NG.

Essex County Council, on behalf of themselves and Norfolk and Suffolk County Councils, commissioned consultant Mr. Andy Hiorns to produce a report on the need for the Norwich to Tilbury proposals put forward by NG. The report concluded that the timing of the proposals was premature and that the transmission route would not be needed until mid-2030s.

RPC wants a pause in the process in order that a full and transparent evaluation of the offshore transmission option is carried out. This option would be best for the community of Roydon, both environmentally and socially.

Additionally, a full assessment should also be carried out on the use of High Voltage Direct Current (HVDC) throughout the whole route overland which would produce much less environmental and visual damage, this being considered the second best option by RPC.

Pylons are an old technology for overland transmission belonging to the early 20th century. This fact is recognised by NG and the harm they cause to landscapes. NG are removing pylons in other parts of the UK. Why is East Anglia different?

The NG preference for pylons in its plan is based on costings from 2012 when new technology was not so advanced as the present time. This fact was recognised by the Minister for Energy Security and Net Zero, Justin Tomlinson, in the House of Commons on 23rd May when he said "We had a deep dive discussion about overhead cables being the strong starting presumption, which in simple terms is based on the cost, as per the electricity system operator's 2012 figures. I am sure that the House would recognise that, since 2012, significant advances have been made to new technology. As has been mentioned, Germany has already made underground cables the default." In the same month, the Energy Secretary, Claire Coutinho, stated that "our energy security must not come at the expense of food security" when announcing limitations on solar farms on best quality farmland. This restriction should also apply to the Norwich to Tilbury project where infrastructure and build will compromise and use farmland of grade 3 and above.

RPC opposes NG's plan for pylons and partial undergrounding through the Waveney Valley as it currently stands because of the great harm it would do to the valued landscape

The route proposed would take the pylons or cabling through the narrow gap between the habitats of Roydon Fen and Wortham Ling. Suffolk Wildlife Trust, in describing Roydon Fen, a County Wildlife Site, states that "This 49 acre reserve offers a sense of the wildness a landscape of extensive wetland once would have offered. Wortham Ling is Site of Special Scientific Interest (SSSI) composed of acid grassland and dry heath."

A joint Suffolk and Norfolk County Councils Valued Landscape assessment notes that "...the length of the Waveney Valley expresses many special qualities, and in the context of Suffolk and Norfolk, it is considered to be a valued landscape. Conserving and enhancing the special qualities articulated in this report is a key aspiration of existing planning policy."

The Waveney Valley is described by Suffolk Wildlife Trust (SWT) as "part of a chain of fens that are strung like jewels along the Suffolk and Norfolk border. This wildlife corridor contains bat roosts as well as Schedule 1 protected bird species such as Barn Owl, Heron and Swift. The valley consists of rare peatland water meadows and, recognising this fact, SWT have recently embarked upon a long-term project, with the support of government funding, to connect and improve the river valley between Diss and the headwaters of the Little Ouse to the west which includes all that part of the Waveney Valley within Roydon Parish. Pylons would be a huge visual intrusion on this section of the valley, compromising the recovery project. The proposal to underground cables through this part of the Waveney valley would be no less damaging than the pylons, apart from removing their visual impact. The proposal to start undergrounding adjacent to the A1066 near Hall Lane, and ending on the other side of the Waveney valley to the south near the village of Palgrave, would require large CSE compounds at each of these locations. Along with associated access and security apparatus required for these structures, their overall visual impact would be completely out of character with the local landscape, standing out along the skyline of each side of the valley, and being almost as intrusive as pylons. This undergrounding would only be acceptable if it was extended much further to the north and south.

Extending the undergrounding well to the north would be required to avoid the proximity of the pylons to residential properties in Snow Street, with 11 listed buildings which are heritage assets integral to the character of Roydon village. Additionally, the pylon route just north of the A1066 and just west of Hall Lane, Roydon is exceptionally close to residential properties along Hall Lane and as it is also to properties at the west end of Snow Street and in Darrow Lane. It is, in fact, incredible that it should be proposed to place pylons so close to them.

The prospect of the implementation of the proposals set out for this project has caused much anxiety and mental stress to many of the residents, considering not only the prospect of pylons themselves but the high level of local disruption over the long construction period with local roads completely unsuitable to high numbers of HGV movements and general construction traffic. Many of the roads have no pavements, blind turns and are single lane. This view has been taken by the County Highways Department in relation to other recent planning applications of a similar scale in the area where large numbers of HGV movements and other heavy vehicles are expected, notably applications in relation to an industrial plant at Deal Farm, Bressingham. National Grid figures show HGV traffic increases to our section of the route ranging from 26% to 75% (the 12 hours from 7am to 7pm on weekdays) depending on the specific site being worked, peak construction being in 2029. These are the areas described in NG's report as A1066 High Road, Park Road and Victoria Road. This will produce 8,984 additional vehicle movements per day, 795 of them being HGVs.

RPC notes that the proposed pylon route, passing through the narrow gap between Roydon and Bressingham, necessitates a number of sharp turns in contravention of Holford Rule 3. This rule seeks

to ensure the very minimal use of the larger angle towers but, in the flat landscape, these are even more visually impacting.

The Diss and District Neighbourhood Plan (DDNP) was adopted by referendum in 2023, and includes the whole of Roydon parish. The DDNP designates Key Views in Roydon as part of DDNP Policy 16, chosen by local residents, two of which will be severely affected by the proposed pylon route. These views very much give a feel of place to the locality and, it should be noted, were chosen by the public before the Norwich to Tilbury project was public knowledge. Key View 28 looks all around from the middle of Darrow Lane, just north of Snow Street; the open landscape nature of this view will be devastated by the visual impact of 50m. pylons. Similarly, Key View 25 looks south from the churchyard of the grade 1 listed St. Remigius Church across the Waveney Valley to the south, another open landscape where 50m pylons would completely blight this vista. The setting of the church would itself be seriously compromised by the proximity of pylons. Additionally looking west from Key View 24, from Public Footpath 15, will produce a clear sight of the pylon route.

It is to be noted that public footpaths 1,2, 3, 4, 5, 10, 14 (part of Angles Way) and 23 will all be impacted by temporary closure during construction and the very close proximity of pylons permanently. Additionally, footpaths 8 and 15, will have clear views of the pylons when in place. These footpaths are well used by local people as well as visitors to the area.

Fox Wood Forest School, situated on Snow Street, and developed to support children's mental and physical well-being through connection with nature, will be compromised in the build process and permanently through the pylon's visual impact. Heron Meadow, a Care Farm promoting well-being and learning, off Doit Lane, Roydon will be similarly affected.

The Diss & District Neighbourhood Plan (DDNP) defines 37 Non-Designated Heritage Assets (NDHA) within its seven parishes which are important to the history of the locality, the character of the neighbourhood and sense of place. The setting and enjoyment of some of these will be spoilt by 50m. high pylons:

- Roydon Fen (Track and Environs), NDHA 16. Clear site of pylon line at its western end.
- Roydon Church and White Hart, NDHA 27. The vista to the south from this grouping of historic buildings will be entirely blighted by the presence of pylons
- The mediaeval moated site of Bush Hall, NDHA23, lies directly on the proposed pylon route in the bottom of the Waveney Valley .

The DDNP also designated a number of Local Green Spaces (LGS) to be afforded protection. RPC considers that the setting of Little Green, Snow Street, LGS 31, and Potash Lane Fields, LGS 34, will be spoilt both during and after construction of the proposed pylon route.

RPC is also concerned by the evidence suggesting an association between proximity to power lines and childhood leukaemia. Emeritus Professor Denis Henshaw in the school of Chemistry at Bristol university is a member of the co-ordinating committee of the Government Stakeholder Advisory Group for EMF (SAGE). He is a member also of the Human Radiation Effects Group funded by the charity Children with Leukaemia to research the possible environmental causes of childhood leukaemia with the emphasis on non-ionising radiation. Currently, evidence suggest that power frequency magnetic fields suppress the production of the hormone melatonin, a natural anti-cancer agent secreted by the pineal gland, which may explain the adverse health effects associated with magnetic field exposure, as experienced in proximity to high voltage power lines. Power lines also emit corona ions which may also explain the apparent increase in the risk of childhood leukaemia

within 600 metres of such lines. Further studies by the Oncology department of Bristol University support this view. Whilst appreciating such associations are not conclusively proven, nevertheless RPC, and local residents, are deeply concerned by such risks and the council considers, therefore, that the presence of such power lines present an unacceptable level of possible risk to human health, and something not to be gambled with.

RPC considers that residents should not be “bribed” by offers of so-called community benefits by way of compensation. Such benefits do not compensate for the huge, permanent damage that 50m pylons will do to our residents’ quality of life and the environment, as well as significant reduction in property values.

RPC appreciates that the UK needs more energy security, and from sustainable resources. However, this project will directly benefit London and the south-east of England whilst East Anglia is left permanently scarred by it. The offshore option should, as stated earlier, be fully evaluated and if any additional cost is involved over and above that of the land route, then this should be funded by those communities benefitting from the scheme.

To conclude, RPC considers the options to be, in order of favour:

1. Pause the scheme and fully investigate the offshore option with a view to its implementation unless there is very good reason why not, excepting cost.
2. Pause the scheme and build the whole route underground using HVDC cables, now possible with new technologies proven in other European countries.
3. Pause the scheme and extend the undergrounding over more significant lengths of the route to protect the landscape and environment, and avoid close proximity to people’s homes as set out above.

On behalf of Roydon Parish Council,
South Norfolk.