

## Closing Statement to Planning Inspectorate 2nd Aug 2026

### 1. Treasury Green Book

The procedures set out in the above require that all the options for a large project are properly appraised, with full build and lifetime costs included. This was not done for N2T. Alternative options such as an integrated offshore grid, reinforcing the existing lines with higher capacity conductors, or underground HVDC were not even discussed with impacted communities.

### 2. Breaches of Holford Rules

National Grid has declared that it intends to continue to use the Holford Rules as its basis to build overhead lines. A strict application of these rules would suggest that the entire route should be underground as no part of the route is not of "outstanding natural beauty", or High Amenity Value; eg Shelfanger Meadows, Roydon Fen, Wortham Ling.

### 3. Archaeology

Desk based surveys of archaeological potential, assume that we already know the likelihood of important archaeology being present. In a region of the country which is rich in archaeology, this approach runs the risk of destroying unknown sites, before their investigation can even begin. It is imperative to carry out geophysical surveys and test digs (pits or trenches) as appropriate before any ground is broken for any reason whatever. This must be done for every pylon, haul road, storage area and transformer base on the entire route.

### 4. Landscape

The pylons, if built, would stride across the east boundary of Shelfanger Parish, which is a region of level, beautiful, open countryside, farmland and a few rural houses. They would dominate the view for miles around, with no possibility of softening the effect by any conceivable landscaping or tree planting. An offshore grid or underground HVDC option would avoid these harms entirely.

### 5. Roads and Access

The only roads close to the envisioned pylon locations in Shelfanger are narrow single track rural roads. They are unsuitable for HGVs and are essential for the normal agricultural and commercial businesses in the vicinity. These roads are barely adequate for normal domestic and light commercial vehicle use. Closing these roads for extended periods would be extremely disruptive to normal life.

### 6. Proximity to Houses and Businesses

There are several substantial houses, farms, rural buildings, smaller houses and commercial businesses in the Shelfanger area :- [REDACTED], Little Crown B&B, Green Dragon B&B, Paula's Pawsome Dog Park and K&C Mouldings to name but six. Good access to these enterprises by their customers and the general public is essential in order for them to function. A protracted period of road closure or even traffic limitation could mean financial disaster.

### 7. Environment, Habitat, Species

The proposed route would be within 450m of the Shelfanger Meadows SSSI. This is a 10.3 hectare area described by Natural England as "one of the most important areas of unimproved grassland in Norfolk. It has been traditionally managed by a hay cut followed by grazing for centuries, and as a result its flora is rich, including uncommon species". The nearest pylon RG73, and associated compound would be ~200m away. Any large scale airborne pollution from roadworks, excavations etc. risks damaging this precious location.

As the route crosses many field and road borders, there will be inevitable loss of significant areas of hedging. These are vital habitats for local hedgehogs. They offer shelter, foraging areas and transit routes. The British hedgehog has been classified for 5 years as "Vulnerable to Extinction" by the Mammal Society for Natural England. The primary causes of this threat are Habitat loss, Death due to road traffic, and Stress due to human invasion. N2T would be guilty of increasing all 3 risk factors.

I have observed hedgehogs visiting my garden, on [REDACTED], frequently for several years. This suggests a healthy local population, which is a national treasure and must be protected and supported. In addition there are many old agricultural buildings across the whole parish, which are home to bats. I have seen several flying over my garden on [REDACTED], though I do not know the species.

### 8. Risks to Aviation

East Anglia is an area, where there is a great deal of aviation activity. It includes the entire spectrum of flying from hot air balloons, slow paragliders through gliders and microlight aircraft, to faster light sport aircraft and commercial passenger planes, all types of helicopters to fast jet military aircraft. Many of these aircraft spend considerable parts of their flying time at low level. The introduction of 50m high pylons poses a considerable risk to these aircraft over a very large part of the region.

This is particularly so for the military aircraft, which use this area for exercises involving very low, fast flying both day and night. Many of these exercises follow a west to east flight path, which intersects the proposed pylon route (~500m from my house) at 90 degrees, so there would be little time to "see and avoid" the hazard.

With at least 4 major RAF / USAAF bases in the area, this activity can be expected to continue indefinitely. Flying fast and low over open country is challenging enough, without the additional obstacle of 50m high HV cables. This project must be paused for a rethink.