

1. Introduction

I am an Interested Party in this Examination ([REDACTED]) and a resident of Roydon, Norfolk, where my property and community are directly affected by the proposed Development Consent Order.

At the outset, I wish to make my position clear. I support the national need to reinforce the electricity transmission network, and I recognise the importance of investing in infrastructure that will provide a secure and resilient electricity system for future generations. My objection is therefore not to the principle of the Project itself.

Equally, this submission is not based on the belief that Roydon, Norfolk is more important than any other community affected by the Norwich to Tilbury Project. Every town and village along the route deserves to have its heritage, landscape, environment and community properly considered. My evidence is necessarily centred on Roydon, Norfolk because it is the community in which I live and the area I have been able to examine in detail throughout the consultation and Examination process.

Over the past two years I have attended consultation events, reviewed the Applicant's documentation, participated throughout the Examination and submitted Relevant and Written Representations. This Closing Submission does not repeat those earlier submissions in full. Instead, it draws together the principal matters that, in my respectful view, remain unresolved at the close of the Examination and explains why they are material to the Examining Authority's recommendation.

The central issue raised is not whether the Project should proceed, nor whether one community should benefit at the expense of another. Rather, it is whether the Applicant has demonstrated that the chosen alignment represents the best overall solution when engineering requirements, construction costs, environmental protection, heritage, landscape and the interests of affected communities are considered together.

Throughout the Examination, National Grid has presented extensive technical evidence explaining how the Project can be delivered. That evidence is substantial and reflects the expertise of those involved. However, the volume of evidence does not, of itself, answer the planning question that lies at the heart of this Examination: has the Applicant demonstrated that the chosen route is the best overall solution, or simply that it is a deliverable solution?

This submission is therefore intended to assist the Examining Authority by examining that question through the evidence relating to Roydon, Norfolk. While the examples are location-specific, the planning principles they illustrate are of wider relevance to the Examination as a whole.

2. The Central Planning Question

This Closing Submission does not revisit every matter considered during the Examination, nor repeat the detailed representations already submitted. It is accepted that any nationally significant infrastructure project will inevitably affect the communities through which it passes; that is not in dispute. The question for the Examining Authority is therefore not whether the Project should proceed, but whether the Applicant has demonstrated that the

chosen alignment represents the best overall balance between national need and its effects on people, heritage, landscape and the environment.

Throughout the Examination, the Applicant has presented extensive engineering, environmental and technical evidence in support of the proposed alignment. That evidence demonstrates that the Project can be constructed and operated. However, the planning judgement required of the Examining Authority extends beyond technical feasibility. It requires consideration of whether reasonable alternatives were properly identified, evaluated and balanced before selecting the preferred route.

The matters discussed in the following sections are based upon evidence submitted during the Examination, together with the Applicant's own assessments and responses. The central issue can therefore be expressed as a single question:

Has the Applicant demonstrated that the chosen alignment represents the best overall solution when engineering requirements, cost, environmental protection, heritage, landscape and the interests of affected communities are considered together?

3. Route Selection and the Public Interest

The purpose of the planning process is not simply to identify a route that can be constructed. It is to identify the solution that provides the best overall balance between engineering requirements, environmental protection, heritage, landscape, cost and the interests of the communities affected.

No single factor should determine that outcome in isolation. Construction cost is clearly an important consideration, as are engineering practicality and the need to deliver the Project within a reasonable timescale. Equally, however, the planning system requires careful consideration of the environmental and social consequences of route selection, particularly where nationally significant infrastructure passes through historic landscapes and established communities.

Throughout the consultation and Examination, National Grid has consistently explained why the proposed overhead alignment is its preferred solution. I do not question the professionalism of those involved or the significant amount of work undertaken in developing the Project. My concern is whether the evidence demonstrates that all reasonable alternatives were assessed with sufficient transparency before the preferred alignment was selected.

This is not an argument that overhead transmission lines should never be constructed, nor that undergrounding should be adopted in every location regardless of cost or engineering consequences. My concern is that the route selection process appears to have been driven primarily by identifying a technically deliverable and economically efficient corridor before fully demonstrating that it represented the best overall solution when heritage, landscape, environmental and community considerations were weighed alongside engineering and cost.

Roydon, Norfolk provides a detailed example of this wider planning issue because it is the community I know best and the location I have examined most closely throughout the Examination. The following sections examine that evidence, drawing principally upon the Applicant's own documents and responses during the Examination, and consider whether reasonable alternatives capable of reducing the cumulative impacts on affected communities were fully explored before the preferred alignment was adopted.

4. Assessment of Alternatives

A fundamental part of the planning process for nationally significant infrastructure is the proper assessment of reasonable alternatives. This is not simply a procedural exercise; it is the means by which the decision-maker can be satisfied that the preferred option represents the most appropriate planning outcome when engineering, environmental, heritage and community considerations are weighed together. *(NPS EN-5, paragraphs 2.9.14–2.9.15, which require an applicant to demonstrate consideration of the costs and benefits of feasible alternatives and to set out its rationale in the Environmental Statement)*

This duty is not simply a matter of policy expectation; it is a statutory requirement. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, Regulation 14(2) and Schedule 4, paragraph 2, require the Environmental Statement to include “a description of the reasonable alternatives... studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”

Throughout the consultation and Examination, National Grid has explained why the proposed overhead alignment is its preferred solution. I recognise that considerable technical work has been undertaken in developing the Project and that engineering feasibility, operational requirements, construction complexity, programme and cost are all legitimate planning considerations.

The National Policy Statements also recognise that overhead transmission lines will often represent the appropriate solution for new electricity infrastructure. My submission does not challenge that principle. Rather, it questions whether, in this particularly sensitive location, the Applicant has demonstrated that the chosen alignment represents the most appropriate planning outcome after reasonable alternatives and opportunities to avoid or reduce adverse effects were comparatively assessed. *(NPS EN-5, paragraph 2.9.20)*

The purpose of assessing alternatives is not simply to demonstrate that the preferred option can be delivered. It is to demonstrate why that option was selected in preference to other reasonable alternatives and why, having considered all relevant planning factors, it represents the most appropriate planning outcome.

In my respectful view, the Applicant has demonstrated that the proposed alignment is capable of being delivered. However, I remain unconvinced that the Examination evidence demonstrates that it represents the best overall planning solution through Roydon, Norfolk. That distinction is central to my submissions. The issue is not whether the Project can be constructed, but whether the Applicant has satisfactorily demonstrated that the preferred alignment was selected following a sufficiently transparent assessment of reasonable alternatives and an appropriate balancing of engineering, environmental, heritage and community considerations.

The Waveney Valley Alternative is, in my respectful view, the clearest example of this issue.

Its significance lies not simply in the fact that it proposed an underground section. It is significant because the Applicant itself developed and consulted upon an alternative design within this particularly sensitive part of the route before deciding not to include it within the Development Consent Order application. The planning question is therefore not whether

undergrounding should automatically replace overhead transmission, but whether the comparative assessment of that alternative has been presented with sufficient transparency to demonstrate why the preferred alignment was selected.

Throughout the Examination I have consistently questioned why the underground section proposed within the Waveney Valley Alternative terminated where it did. The consultation material identified an underground option within this sensitive landscape, yet the section concluded before the route passed through the most sensitive part of the historic settlement of Roydon, Norfolk, where the cumulative effects on heritage, landscape, ecology and community character are greatest.

This is not a concern raised by this submission alone. In its First Written Questions (Question ALT 1.7, issued 20 March 2026), the Examining Authority itself asked the Applicant to signpost any pre-application consultation responses which led to its rejection of the Waveney Valley alternative – the same question of transparency raised in this submission. The Examining Authority's own question suggests that this matter remained unresolved at the point those questions were issued.

I have consistently maintained that a reasonable extension of the underground section beyond Roydon, to approximately the point where the alignment changes direction near Reference Tower RG76, appears to me to have been a reasonable option that should have formed part of the comparative assessment. Such an option had the potential to avoid or materially reduce many of the cumulative heritage, landscape and visual effects identified throughout this submission before returning to an overhead alignment beyond the village. I do not suggest that this option should automatically have been adopted. However, having considered the Examination evidence as a whole, I remain unconvinced that it has been demonstrated, with sufficient transparency, why such an option ceased to be a reasonable alternative worthy of further comparative assessment.

My purpose in raising this issue is not to invite the Examining Authority to redesign the Project or to select an alternative route. I recognise that the Examination is concerned with the application before it. My concern is whether the Applicant has demonstrated, through a sufficiently transparent assessment of reasonable alternatives, that the proposed alignment represents the most appropriate planning outcome for this particularly sensitive part of the route. In my respectful view, the Waveney Valley Alternative remains the clearest example of where I have been unable to identify that justification within the Examination evidence.

The following sections examine the evidence relating to Roydon, Norfolk, not because it is more important than any other community affected by the Project, but because it provides a detailed and evidence-based example of how these wider planning questions arise in practice.

5. The Historic Settlement of Roydon, Norfolk

This section sets out why Roydon, Norfolk provides a useful example of the wider planning issues that arise where nationally significant infrastructure passes through an established historic settlement.

Roydon, Norfolk has evolved over many centuries as a rural village whose character is defined not by a single landmark but by the relationship between its historic lanes, listed

buildings, surrounding countryside and natural environment. The settlement extends through Snow Street, Barnards Lane, Hall Lane and Darrow Lane, where historic cottages, farmhouses and agricultural buildings continue to reflect the village's historic development. These are complemented by the Grade I listed Church of St Remigius, numerous Grade II listed buildings, the distinctive landscapes of Roydon Fen and Wortham Ling, mature hedgerows, protected trees and an extensive network of public rights of way.

These individual features should not be viewed in isolation. Together they form the historic environment of Roydon, Norfolk, where heritage, landscape, ecology and community character are closely interconnected. It is this cumulative relationship that contributes to the village's identity and sense of place.

The proposed alignment passes through the middle of this wider historic landscape. As it approaches from the north, the route enters the setting of the historic settlement before continuing between Roydon Fen and Wortham Ling, passing close to Snow Street, Barnards Lane, Hall Lane and Darrow Lane. It therefore affects not only individual heritage assets but also the wider landscape context in which those assets are experienced.

Particular attention has rightly been given during the Examination to the Grade I listed Church of St Remigius. However, the church should not be regarded as the sole heritage consideration. It forms one important component of a much broader historic settlement that includes numerous other designated and non-designated heritage assets, historic routes, agricultural landscapes and valued views. The planning judgement should therefore consider the effect of the Project on the historic settlement as a whole rather than focusing on any single feature.

Darrow Lane illustrates this wider point. In addition to its rural character, it contains a Grade II listed eighteenth-century timber-framed dwelling, dating from around 1750, together with other historic buildings that contribute to the character of the settlement. During construction, the proposed haul roads, heavy goods vehicle movements and associated activity have the potential to affect the setting and enjoyment of these historic assets. I do not suggest that damage should be assumed. Rather, I question whether the cumulative effect of prolonged construction activity on the wider historic environment has been given sufficient prominence within the overall assessment.

Roydon, Norfolk therefore demonstrates how a combination of heritage assets, valued landscapes, ecological designations and established communities can converge within a relatively short section of the route, and whether the evidence demonstrates that the chosen alignment represents the best overall planning outcome in circumstances where so many important considerations come together.

6. Action Point 27 – The Applicant's Own Evidence

One of the most significant documents produced during this Examination is the Applicant's response to Action Point 27, issued following Issue Specific Hearing 2. The Examining Authority requested a coordinated assessment of the Waveney Valley, including Snow Street, Roydon, Roydon Fen and Wortham Ling, together with proposals for addressing the residual landscape and visual effects identified within this area.

In my respectful view, this document is important not because it resolves the outstanding issues affecting Roydon, Norfolk, but because it provides the Applicant's own assessment of those issues. Throughout this submission I have sought, wherever possible, to rely upon the

Applicant's own evidence before expressing my own conclusions. Action Point 27 therefore provides an appropriate starting point for considering whether the proposed alignment represents the best overall planning solution.

The document acknowledges that the area around Roydon, Norfolk presents a concentration of landscape, heritage and environmental constraints requiring specific consideration. It identifies opportunities for landscape enhancement and compensation but makes clear that these measures are illustrative, remain subject to agreement and, even if implemented, would not materially alter the significant landscape and visual effects identified within the Environmental Statement. The Applicant also confirms that many of the proposed measures lie outside the Order Limits, are on land outside its control and had not been agreed with the relevant landowners at the time the document was prepared.

The response further confirms that no final agreed position had been reached regarding compensation for the residual effects identified within this part of the Project. That is an important consideration. It demonstrates that, at the close of the Examination, the effects recognised by the Applicant remain only partially addressed and that the proposed enhancement measures cannot yet be regarded as secured mitigation.

The accompanying Constraints Plan is equally significant. Rather than considering individual features in isolation, it identifies a landscape comprising Snow Street, Roydon, Roydon Fen and Wortham Ling, together with heritage assets, vegetation, public rights of way and visual receptors. This reflects the very point made earlier in this submission: that the planning issues affecting Roydon, Norfolk should be considered cumulatively as part of one connected historic and environmental landscape, rather than as a series of separate impacts.

Particular attention has been given during the Examination to the Grade I listed Church of St Remigius, and rightly so. However, the Constraints Plan itself demonstrates that the planning considerations extend well beyond the church. The historic settlement includes Snow Street, Barnards Lane, Hall Lane and Darrow Lane, together with numerous Grade II listed buildings, Roydon Fen, Wortham Ling and the wider rural landscape that gives these assets their setting. It is this broader historic environment that the Applicant was asked to consider through Action Point 27.

I do not suggest that Action Point 27 proves the Applicant's route selection is wrong. Rather, I consider that it demonstrates the sensitivity of this location and confirms that significant residual effects remain despite the enhancement measures proposed. The document therefore raises an important planning question. If the Applicant's own assessment concludes that material residual effects remain and that the proposed enhancements do not materially reduce those effects, has sufficient evidence been presented to demonstrate that the chosen alignment nevertheless represents the best overall solution?

That, in my respectful view, is the issue that the Examining Authority is ultimately asked to determine.

7. The Holford Rules and Routeing Principles

The Holford Rules have, for many decades, provided the recognised principles for routing overhead electricity transmission lines. Although they are not statutory requirements, they remain an important framework for balancing engineering practicality with the protection of landscape, heritage and environmental interests. National policy continues to recognise their relevance when considering new transmission infrastructure.

Within its response to Action Point 27, the Applicant states that the alignment through Roydon, Norfolk, including Roydon Fen, Wortham Ling and the setting of the Grade I listed Church of St Remigius, has been developed in accordance with Holford Rules 2, 4 and 5. That statement is an important part of the Applicant's justification for the chosen route.

For reference, NPS EN-5 (paragraph 2.9.17) records Holford Rule 2 as requiring applicants to “avoid smaller areas of high amenity value or scientific interest by deviation”, Rule 4 as requiring that applicants “choose tree and hill backgrounds in preference to sky backgrounds wherever possible”, and Rule 5 as requiring a preference for “moderately open valleys with medium or moderate levels of tree cover where the apparent height of towers will be reduced, and views of the line will be broken by trees”. NPS EN-5 (paragraph 2.11.2) further provides that the Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with these Rules.

The Examining Authority has itself sought further justification on this point. Question DES 1.6 of its First Written Questions asks the Applicant to “set out how Holford Rule 1 has been applied in designing the route of the proposed development” specifically for the Waveney Valley (among three other named locations), and separately requests further information on the application of Rule 4, including details of where the route crosses ridge lines.

The purpose of this section is not to dispute the value of the Holford Rules or to suggest that absolute compliance can be achieved in every location. National infrastructure projects inevitably require planning judgements and compromises. Rather, the question is whether the evidence presented during the Examination demonstrates that the principles embodied within those rules have been applied in a way that represents the best overall planning outcome for this particular section of the route.

The route through Roydon, Norfolk passes between Roydon Fen and Wortham Ling, within the wider setting of the historic settlement, and in close proximity to Snow Street, Barnards Lane, Hall Lane and Darrow Lane, where a number of listed buildings contribute to the historic character of the village. It also affects the wider setting of the Grade I listed Church of St Remigius, together with important public views across the surrounding agricultural landscape.

These are not separate planning considerations. They form part of one interconnected historic and environmental landscape. It is therefore appropriate to consider whether the routeing principles have been applied not simply to individual assets but to the cumulative relationship between heritage, landscape, ecology and community character.

The Applicant's own evidence acknowledges that significant residual landscape and visual effects remain within this area. It also acknowledges that the proposed enhancement measures would not materially alter those assessed effects. In those circumstances, it is reasonable to ask whether the application of the Holford Rules has fully achieved their underlying objective of avoiding or reducing environmental and visual impacts wherever reasonably practicable.

I do not suggest that the Applicant has ignored the Holford Rules, nor do I suggest that another alignment would necessarily have avoided every impact. My concern is narrower. Where the Applicant relies upon compliance with recognised routeing principles as part of its justification for the chosen alignment, the supporting evidence should demonstrate why that conclusion is justified, particularly where the route passes through a location containing such a concentration of heritage, landscape and environmental constraints.

Ultimately, the question for the Examining Authority is not whether the Holford Rules have been referenced within the Applicant's documentation, but whether the evidence as a whole demonstrates that their underlying principles have been applied in a manner that achieves the best overall balance between engineering requirements and the protection of the historic settlement of Roydon, Norfolk.

8. The Cumulative Planning Balance

Planning decisions for Nationally Significant Infrastructure Projects are rarely determined by a single issue. Instead, they require the decision-maker to consider the cumulative effect of all relevant planning considerations before reaching an overall judgement as to whether the proposal represents the best balance between the public benefits of the Project and the impacts that arise from it.

This principle is particularly important in Roydon, Norfolk, where no single factor, viewed in isolation, may be sufficient to justify a different planning outcome. However, when those factors are considered collectively, a different picture emerges.

Within a relatively short section of the route, the proposed alignment affects:

- the historic settlement of Roydon, Norfolk, including Snow Street, Barnards Lane, Hall Lane and Darrow Lane;
- the setting of the Grade I listed Church of St Remigius and numerous Grade II listed buildings;
- the landscapes of Roydon Fen and Wortham Ling;
- established public rights of way and valued public views;
- mature hedgerows, protected trees and the wider rural character of the Waveney Valley; and
- the amenity of an established rural community during both construction and operation.

Each of these matters has been assessed individually within the Applicant's documentation. The question for the Examining Authority, however, is whether their combined effect has been given sufficient weight within the overall planning balance.

Action Point 27 is particularly relevant in this respect. The Applicant acknowledges that significant residual landscape and visual effects remain within this part of the Project and that the proposed enhancement measures would not materially alter those effects. The document also confirms that many enhancement proposals remain indicative and had not been secured through agreement with the relevant landowners at the time it was submitted.

In my respectful submission, these findings reinforce the need to consider the cumulative impact of the Project rather than viewing each effect in isolation. Heritage, landscape, ecology, visual amenity and community character are closely interconnected within Roydon, Norfolk. The significance of this location lies not in any one designation or protected asset, but in the way these interests combine to create a distinctive historic and environmental landscape.

Against this must, of course, be balanced the substantial public benefits of the Project. I recognise the national need for reinforcement of the electricity transmission network and I do not dispute the importance of delivering that infrastructure. My submission is therefore not

that the Project should fail because impacts exist. Rather, it is that where such a concentration of planning constraints is present, the evidence should clearly demonstrate why the chosen alignment nevertheless represents the best overall solution when compared with any reasonable alternative.

This is the central planning question that runs throughout this submission. If significant residual effects remain, if important heritage and landscape interests continue to be affected, if enhancement measures do not materially reduce those effects, and if questions remain regarding the comparative assessment of alternatives, then it is reasonable to ask whether the overall planning balance has been fully demonstrated.

That question does not require the Examining Authority to reject the Project. It requires the Examining Authority to be satisfied that the chosen alignment through Roydon, Norfolk has been selected because it represents the best overall planning outcome, rather than simply because it is capable of being delivered.

It is for that reason that I respectfully invite the Examining Authority to consider whether further mitigation, additional undergrounding, or other route modifications within this section of the Project could achieve a better balance between the acknowledged national benefits of the scheme and the protection of this historic and environmentally sensitive landscape.

9. Planning Policy and the Public Interest

Throughout this submission I have accepted the national need for reinforcement of the electricity transmission network. I recognise that the Norwich to Tilbury Project forms part of the Government's wider strategy to strengthen electricity infrastructure, improve network resilience and support the transition to a low-carbon economy. I do not dispute that substantial public benefits arise from the delivery of this Project.

However, the existence of a compelling national need does not remove the requirement for careful planning judgement. National Policy Statements EN-1 and EN-5 recognise that new electricity transmission infrastructure will often be required and that overhead lines will frequently represent the appropriate engineering solution. They also recognise, however, that route selection must take proper account of landscape, heritage, environmental and community considerations, particularly where proposals pass through sensitive locations. (*NPS EN-1, paragraphs 3.3.65–3.3.68; NPS EN-5, paragraph 2.9.20*)

The purpose of the planning system is therefore not simply to identify a route that can be delivered. It is to determine whether the selected alignment represents the most appropriate planning outcome when all relevant considerations are weighed together. This requires engineering feasibility, operational requirements, construction complexity and cost to be balanced alongside the protection of heritage assets, valued landscapes, biodiversity, residential amenity and the character of established communities.

The National Policy Statements also recognise that nationally significant infrastructure projects will inevitably give rise to adverse effects. The objective is not to eliminate every impact, but to demonstrate that adverse effects have been **avoided, reduced and mitigated wherever reasonably practicable** before the remaining planning balance is assessed. My submission is not that every impact must be removed before development can proceed. Rather, I respectfully question whether the Examination evidence demonstrates that this

process has been fully achieved in relation to the route through Roydon, Norfolk. (*NPS EN-1, paragraphs 3.1.2 and 4.1.5*)

In Roydon, Norfolk, the Applicant's own evidence demonstrates that the proposed alignment passes through an area where heritage, landscape, ecology and community interests converge within a relatively short distance. The historic settlement, designated heritage assets, Roydon Fen, Wortham Ling, valued views and the living community are not isolated considerations; they form part of one interconnected planning context. Action Point 27 itself recognises this by assessing the area as a single landscape and acknowledging that significant residual landscape and visual effects remain.

Planning policy also recognises the importance of transparent decision-making. Where reasonable alternatives have been considered and discounted, the reasons should be sufficiently clear to enable both the decision-maker and affected communities to understand why the preferred alignment has been selected. This is particularly important where the route passes through an area containing a concentration of environmental, heritage and community constraints. (*NPS EN-5, paragraphs 2.9.14–2.9.15*)

Since much of this Examination was undertaken, the National Energy System Operator (NESO) has published its **Electricity Transmission Design Principles** (June 2026). Although these Principles are not retrospective and are not relied upon as a policy basis for determining this Application, they nevertheless provide a useful indication of the continuing evolution of national transmission planning.

The Principles reinforce the importance of protecting landscapes and amenities of cultural and community importance, applying the mitigation hierarchy of avoiding, reducing, mitigating and compensating adverse effects, undertaking robust and transparent option appraisal, minimising cumulative impacts and meaningfully reflecting community views where reasonably practicable. They also reaffirm the continuing relevance of the **Gunning Principles**, recognising that consultation should take place at a formative stage, provide sufficient information, allow adequate opportunity for participation and demonstrate that consultation responses have been conscientiously considered.

These are not new planning concepts. They reflect many of the same principles already embedded within the National Policy Statements and, in my respectful view, reinforce the planning issues that have underpinned this submission throughout.

My concern throughout this Examination has therefore been one of planning judgement rather than opposition in principle. I fully accept the national need for this Project and the important public benefits it will deliver. However, having considered the evidence presented during the Examination, I remain unconvinced that the Applicant has demonstrated that the chosen alignment through Roydon, Norfolk represents the most appropriate planning outcome when engineering requirements, environmental protection, heritage, landscape, community interests and the assessment of reasonable alternatives are considered together.

10. Conclusions and Matters for the Examining Authority

This submission has not sought to challenge the national need for reinforcement of the electricity transmission network. I fully recognise the importance of modernising the

electricity grid and the significant public benefits that the Norwich to Tilbury Project is intended to deliver.

Nor have I suggested that every environmental or heritage impact can, or should, prevent nationally significant infrastructure from proceeding. Major infrastructure projects inevitably require difficult planning judgements in which competing interests must be carefully balanced.

My submission has focused on one narrower but fundamental question:

Has the Applicant demonstrated that the proposed alignment through Roydon, Norfolk represents the best overall planning solution, rather than simply a solution that is technically capable of being delivered?

Throughout the Examination I have sought, wherever possible, to rely upon the Applicant's own evidence rather than assertion. That evidence demonstrates that this section of the route passes through an area where heritage, landscape, ecology and community interests converge within a relatively short distance.

The Applicant's response to Action Point 27 acknowledges the sensitivity of this location and confirms that significant residual landscape and visual effects remain. It also makes clear that many proposed enhancement measures remained indicative and had not been secured through agreement with affected landowners at the time the document was submitted.

Taken individually, none of these matters may be decisive. Taken collectively, however, they raise an important planning question as to whether the overall planning balance has been fully demonstrated for this part of the Project.

Roydon has been used as the focus of this submission not because it is more important than any other community along the route, but because it is where I live and where I have been able to examine the evidence in greatest detail.

The recently published NESO Electricity Transmission Design Principles reinforce the importance of protecting landscapes and communities, applying the mitigation hierarchy, undertaking transparent option appraisal, minimising cumulative impacts and meaningfully reflecting community views throughout project development. Whilst those Principles are not retrospective and are not relied upon as a basis for determining this Application, they nevertheless demonstrate the continuing evolution of national transmission planning towards the very principles that have underpinned this submission throughout.

I respectfully invite the Examining Authority to consider the following matters when reaching its recommendation:

- Has the Applicant demonstrated that the chosen alignment represents the best overall planning solution when engineering requirements, cost, environmental protection, heritage, landscape and community interests are considered together?
- Has sufficient weight been given to the cumulative effect of the heritage, landscape, ecological and community impacts identified within the historic settlement of Roydon, Norfolk?
- Does the Applicant's own assessment within Action Point 27 support the conclusion that the residual effects are acceptable when viewed against the objectives of the Holford Rules and national planning policy?

- Has the assessment of reasonable alternatives been presented with sufficient transparency to demonstrate why the preferred alignment provides the best overall planning outcome?
- Does the evidence presented during the Examination satisfactorily demonstrate that the planning balance underpinning the Applicant's preferred route through this part of the Waveney Valley has been fully justified?

These are matters of planning judgement that sit at the heart of this Examination.

This submission has never asked the Examining Authority to choose between delivering nationally significant infrastructure and protecting the environment. Nor has it invited the Examining Authority to redesign the Project or select an alternative route. Rather, it has asked whether the evidence presented by the Applicant demonstrates that the proposed alignment represents the best overall planning solution when all relevant planning considerations are weighed together.

If, having considered all of the evidence, the Examining Authority concludes that this has been demonstrated, then my concerns will have been answered. If, however, it concludes that the evidence does not satisfactorily demonstrate that the chosen alignment through Roydon, Norfolk represents the best overall planning solution, then that is a matter which, in my respectful submission, should carry weight in its recommendation to the Secretary of State.