

John Stacey



Summary of this representation.

- Request for a site visit and to take part in future hearings.
- Transcript of my representation at previous hearing.
- Points I had wished to raise at the Earlier Compulsory Acquisition Hearing, but I did not have the opportunity
- A question on Compliance for EN1 on soils.
- Points to support my oral representation.
- NG's responses in their documentation to our consultation requests, and requests directly to Fisher German regarding their site visits.
- Points raised during the examination period: Questions on the degree of LoD that NG are allowing themselves, along with the effect this may have on the RVAA, and other effects of this such as noise and dust.

Request for a site visit.

We respectfully request a site visit to be undertaken in relation to our property.

Request to participate in Future Hearings

I would like to make further representations at future Open Hearings and Compulsory Acquisition Hearings.

Transcript of my oral representation at the open hearing

Please accept my presentation made on the open floor meeting at Ipswich football ground on the 11th Feb.

National Grid have not engaged with those affected and appear not to care.

National Grid are using land agents Fisher German to be the buffer between us them so that they don't have to engage with us.

They claim in all their publicity to engage with those affected by this project, but that is not the reality.

This is a common thread across all the affected landowners.

We, like other landowners, signed intrusive and non-intrusive survey licenses with a promise of us receiving the raw data within 14 days of National Grid being in receipt of this data.

National Grid have continuously refused to give out this data, we had to serve them with an EIA and eventually after a lot of pressure we received our Survey information.

Why does this matter to us?

We could have used the data to support our case.

We have the line crossing our horse paddock and the line is within 160m of our house. We have requested at every opportunity, that this should be moved to the adjoining field which in our opinion is feasible.

The walk over survey commissioned by National Grid recommends that the line be moved away from the horse paddock and this would have supported our case.

The reply, not directly to us but found in their application documents, was that it cannot be moved as it would be contrary to the Halford Rules.

However, at the very beginning in the Braintree webinar in May 2022, [REDACTED] from National Grid did explain that the Halford Rules could not be applied across the whole route. He also said the Gunning Principles still apply as there were options.

However, we were not presented with any options, just presented with a purple swathe on a map and told that the pylons would be within it.

The chosen options had already been decided by National Grid.

In their application, the option they chose, National Grid claim that this application was compliant with EN1 as there are no other suitable sites of poorer agricultural quality that can accommodate the Project.

How can this be the case as at the very beginning they had scoped out soils as stated in their 2022 document Corridor and Preliminary "Routeing and Siting Study Report April 2022".

Additionally, National Grid in this application claim, under health and well-being, state that there's no significant residual effects to health and well-being during construction and operation of the project; therefore, these matters should be afforded limited weight in the planning balance.

National grid's lack of engagement, the length of time for the project, their lack of considering alternatives, are causing great anxiety and stress even at the pre-construction stage. What will it be like when there is three years of noise, dust, financial stress?

How can they claim that there are no significant residual effects to health and well-being?

For National Grids lack of engagement in this scheme, they should be ashamed of themselves.

They are a company with CPO powers.

They have no care for anyone apart from their shareholders, dividends and capital growth.

Thank you

Points I had wished to raise at the Earlier Compulsory Acquisition Hearing, but I did not have the opportunity

For the CAH held, I had originally requested to make a representation to the CAH, but I understand that it was not possible to make one in person.

I was planning on making the following points, some of which the Inspectorate raised:

Funding. Where is the money coming from? If it is in some way coming from the Government, why is the Green Book not being applied?

Costs. These are 6 years out of date, other projects like Sizewell C have nearly doubled in this time.

Compensation. £180.1 million has been quoted, how has this been worked out?

NG are offering either a £6,000 or £8,000 one off payment for the pylon and permanent access, how have NG come to this figure?

A question on Compliance for EN1 on soils.

Lastly, I was going to question the statement found in the Document:

5.7 Policy Compliance Document

Compliance of meeting EN-1

5.11.34

"The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project."

This should be shown as the case in the document from 2022, **Corridor and Preliminary Routeing and Siting Study Report April 2022:**

3.2.29, Pages 43, 44

"Topics such as air quality, soils and geology, and water were scoped out of the Options Appraisal process on the basis that at this phase of the Project with the constraints above already applied, that these topic areas would not have a significant effect on the determination of the preferred route for the connection or substation siting."

As an affected farmer, I would like NG to evidence at what stage were the poorer soils chosen for the route to be able to make this claim. Did NG factor in the actual soil classification, in that grade 3a is a poorer soil to grade 2, even though both are BMV land?

Points to support my oral representation.

Just recently, there has been a report titled "Grid unlocked, Unlocking the benefits of investing in the electricity grid".

On page 27, [REDACTED], Lead Consents Officer for the Norwich to Tilbury project at National Grid, has been quoted "Communities know their areas best. When people see their feedback making a difference, it builds trust and shows we're listening."

We would question this statement; National Grid have not engaged meaningfully at any point.

[REDACTED] from NG made the claim in the CA Hearing that "we do provide feedback to the land agents".

This is not our experience.

We have made our requests at every consultation, face to face meetings, we even took FG over to the area to show them why we had requested the changes.

All we were informed was that it was being looked at, we have never received a direct response nor has our land agent.

We have been led to believe that the line cannot be moved because of the Holford Rules, but we have also been told that the Holford Rules cannot apply across the whole route.

We would like to have a direct reply from NG to our numerous requests for moving the line around TB98, TB97 and TB96, the reply to our request is somewhere in the numerous documents and is not easily found.

For us, moving the line would mean the horses may not need to be moved, saving a likely 6 figure sum for new paddock, stables and arena.

At the moment, the construction site is within the paddock.

This would also move the line and nearest pylon away from the house. Additionally, the haul road being moved would mean around 80m of hedge and ditch would not need to be taken out.

We nor our agent have had a clear, direct response to our request, instead we are expected to locate partial answers in the extensive applicant's documents.

NG's responses in their documentation to our consultation requests. And requests directly to Fisher German regarding their site visits.

Looking at these responses, we have found three responses in the applicants' documentation where we would like to question NG for their meaning and accuracy.

**Volume 5: Reports and Statements Document:
5.1 Consultation Report**

Final Issue A August 2025
Pages 2927/2928

Ref no. 9-6.120

Summary of matters raised:

Suggest that Pylon TB96 and the haul road are relocated north, removing any oversail or encroachment on the paddocks (plan provided by respondent) National Grid notes the respondent's feedback.

National Grid's response:

"Moving TB96 (now TB98) north would add an angle pylon into the alignment which would be less consistent with the Holford Rules. A summary of the Holford Rules is provided within Appendix I22 of this report. The haul road at this location has been moved as far north as possible, a localised commitment during construction is likely to be able to avoid impacts to the horse paddock X Ref no. Summary of matters raised National Grid's response where possible. If you have specific concerns regarding the impact on your property, we encourage you to seek third party advice. Alternatively contact the Lands team, Norwich-Tilbury@fishergerman.co.uk or by calling us on Freephone 0808 175 3314."

My response: "A localised commitment during construction". What does that mean?

Pages 4491/4492

Ref no 10-39.8

Summary of matters raised:

Concern that the proximity of Pylon TB96 to the respondent's property means that no amount of screening and softening will reduce the impact to the landscape to an acceptable level (e.g. impact on property value, noise, traffic, quality).

National Grid's response:

"There is no minimum separation defined in policy between properties and electrical infrastructure beyond ensuring electrical safety and complying with Electric and Magnetic Fields (EMF) guidelines. National Grid follows the guidance in the Holford Rules in developing the alignment. Guidelines on overhead line routeing are known as the "Holford Rules" which remain a valuable tool in selecting and assessing potential overhead line route options as part of the options appraisal process. A summary of the Holford Rules is provided within Appendix I22 of this report. TB96 (now TB98) is in a section of overhead line positioned to be approximately midway between residential properties to either side of the overhead line and also positioned to cross a road and railway and seek to be equidistant from other nearby residential properties. The nearest pylons are at around 200m distance from residential properties with some benefit of screening and filtering views from existing buildings and vegetation including trees. It is considered that the alignment is consistent with relevant planning policy, therefore no change is proposed."

My response: The draft order is actually only around 85m from our house, so due to the large potential variance of the position of the pylon, the edge of the pylon may be not much more.

NG claim its 175m in the RVAA assessments which is likely to be to the centre of the pylon and the centre of our property, so it's not 200m.

There are no other existing buildings between TB96 (now TB98) and [REDACTED] to afford screening and filtering views.

The nearest property to this pylon, other than [REDACTED] is over 400m away. Moving the pylon as suggested would not make any significant difference on the impact to that property. There would also be no effect on the crossing of the road, nor railway line.

Pages 4503/4504

Ref no 10-39.18

Summary of matters raised:

Suggest that the Pylon TB96 and the haul road are relocated north, removing any oversail or encroachment to the paddocks (plan provided by respondent; e.g. to mitigate the impact on paddocks and farming)

National Grid's response:

"National Grid notes the respondent's feedback. In order to change the location of TB95 to TB99 to the proposed alignment from the respondent, we would have to increase the length of the overhead line and increase the number of angled pylons, which would be less consistent with the Holford Rules. We have therefore not proposed a change to the alignment in this location. We previously moved the location of pylon TB98 approximately 60 m to the west along the alignment to avoid the paddock at [REDACTED]

My response: TB98 was moved to the west, but the construction site is still within the paddock at [REDACTED]. If NG had engaged with us, we could have pointed out this alteration still means the horses are affected. If the pylon is moved it will still be on our land, we are not pushing it onto another landowner. We have been told that the Holford Rules cannot apply across the whole route, why do they apply here?

Points raised during the examination period: Questions on the degree of LoD that NG are allowing themselves, along with the effect this may have on the RVAA, and other effects of this such as noise and dust.

One other very important point that I would like to raise since my objection response, which I picked up during the meetings, was the LoD.

Document: 6.4.F2 Environmental Statement Figure 4.2 -Page 2 Proposed Project Design - Permanent Features

The lateral LoD of 50 m either side of centreline and the unlimited longitudinal LoD allows flexibility to move pylon positions in any direction for unforeseen circumstances, such as poor ground conditions or archaeological finds, and to cater for maximum conductor (overhead line) swing. Commitments to restrict the LoD for specific pylon locations are included within the Outline CoCP (document reference 7.2)

This is on top of pylons being able to be 6m higher in nearly all cases. FG had previously told us that the pylons can be moved 20m laterally, but we, like a lot of affected parties, did not know that so long as they are within the draft order limit, they can be placed wherever they like longitudinally.

Considering the large degree of LoD the project has, I would like to question further the RVAA that was carried out on our residence, [REDACTED].

National grid in their documents looked to see if the RVAA was breached.
Ng in their assessment claim to have made a judgement based the worst-case scenarios.

Document: 7.15 Design and Access Statement

1.37

Page B8

A Residential Visual Amenity Assessment (RVAA) (ES Appendix 13.4: Residential Visual Amenity Assessment (document reference 13.4.A4)) for residential properties that fall within 200m of the centre line of the Project has been undertaken, to test if the Project would breach the Residential Visual Amenity Threshold (RVAT) at any of these locations (i.e. would it affect the use and enjoyment of the property overall to such an extent that it would be rendered an unattractive place to live?). This assessment takes into account worst case Limits of Deviation (LoD) scenarios. The RVAA found that the Project will not breach RVAT for any properties.

In my earlier submission of objection to the project, I did reference the Residential Visual Amenity Assessment.

In Document 6.13.A4: Environmental Statement, Appendix 13.4 - Residential Visual Amenity Assessment (Part 1) page 87, the assessment for our property initially recorded the nearest pylon as being approximately 175 metres away.

Shouldn't the judgement be to the edge of the pylon, which is the closest point and not the centre?

Secondly, the grid reference for [REDACTED] is the centre point, and not the closest point to the pylon.

In fact, these distances are theoretical as the pylon could be significantly closer with the large degree of LoD and did it actually consider the pylon potentially being another 6m in height?

The RVAA notes that:

"Views in all directions are open and medium to long distance, looking across a surrounding predominantly arable landscape..."

"The pylon would also be clearly visible from the ground floor windows and most parts of the garden."

"The property would be affected by a large change to views... likely to be a key defining feature... resulting in a high magnitude of effect."

When asked whether lateral and vertical Limits of Deviation (LoD) would affect the magnitude of effect, the response was:

"Yes. There would be a potential reduction in magnitude of effect should the pylon move 50 m further away. The magnitude would reduce to medium, and Step 4 would not be triggered."

On page 165, this distance was revised to roughly 164 metres, one assumes this is to be the centre point of Pylon TB98. Our own measurements indicate the pylon edge would be around 150 metres from the house with the curtilage only around 110m to 120 metres away. These distances must be acknowledged in any valid assessment.

In the report there is the comment "The closest pylon TB98 (53.84 m AOD) would be visible in direct views from the side elevation (north-west facing) and the garden, at a distance of approximately 164 m"

Would this measurement be the view from within the property?

The garden edge is over 30m closer, assuming no LoD for the pylon. Then there is the edge of the pylon, which will be 10m closer.

Have NG, in these assessments, quantified the actual worst-case scenario?

Please can you ask NG what it is. My calculations from the garden edge to the edge of the nearest pylon could be no more than 60m and with a pylon height of 59m.

We are told that RVAA was not breached, how can this be the case when the pylon will be around 4 times higher than the closest building?

It will be overshadowing and overbearing on the house and garden and will dominate the natural landscape.

This excessive LoD could mean that many of the visualisations referred to in the application documents, which NG claim are correct, are in fact a complete misrepresentation. Therefore, discussions during the consultations are based on inaccurate information.

How can this be a valid representation?

This large degree of LoD could also lead to other surveys like noise and dust being now inaccurate.

In summary, the lack of engagement from NG has severely hampered the consultation process.

The large degree of LoD, which has not been set out clearly in the application could severely impact affected parties who previously thought they would not be so affected, they may even become blighted.