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Interested party : 

Further Submission dated 07/07/2026

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Continued lack of engagement with NG.

We met up with both NG and UKPN on the 12 May 2026 at the farm.

We had expected answers following our visit with FG on the 25TH February where we discussed re sighting our horses and crossing points, amongst other items.

This meeting on the 12th with NG was not very productive as we had no answers, instead more questions remained unanswered.

Our land agent has since had an email on the 23rd June.

Concerning the horses this is their response.

National Grid's proposals for managing the impact on our horses;

- *As discussed on site, when I have dealt with similar equine uses on other projects, the usual steps are to mitigate the impact by offering compensation for livery costs off site.*

- *This is a welfare and compensation matter that I will pick up directly with your agent, Paul Walker.*

All along during the consultation once they were aware that we would not accept the line running across the horse paddock whilst the horses were there we were told that we were a special case.

Moving our horses from their home on to a livery is not acceptable.

As the haul road runs through the paddock the length of time the horses would need to be on livery could be as many as 5 years.

We will not uproot them from the only home they have known for the past 14 years in their old age .

One is 23 years old , he may only have 2 to 3 years left, he will not be spending those years away from his home.

They are ridden around the farm on a daily basis.

My wife rides and looks after them and has a job so her time is not unlimited, whilst I am available if needed to look after them whilst she is at work.

If they are on livery it is very doubtful if there will be a similar chance of riding out.

Bringing them back home to ride out will be time consuming and expensive.

At the very least we had expected that NG would fund the resighting of the stable, manege and paddock.

This needs agreeing very soon as the grass needs to be established well before the horses need moving and the chosen new area needs to be unplanted this autumn.

The other issue is that once the line is operational it will cross the existing paddock.

NG have indicated that at Writtle University they will raise the line to reduce the maximum electric fields to below the 5 kV/m reference level recommended by policy to mitigate indirect effects of microshocks.

The guidance NG refers to is voluntary but is not guidance for horses.

Horses are larger than humans, have metal shoes and may have a rider on board.

During the consultation we were told that we may have to be careful handling horses under the wire and they may regularly receive a shock.

Raising the wire line by 2m as proposed by NG at Writtle will only offset the height of the horse and rider.

Looking at the guide: Power Lines : Control of Microshocks and other indirect effects of public exposure to electric fields.

In the guide it does give several scenarios where micro shocks can occur, the ones that can occur for the horses are :

Ungrounded person touches grass with bare feet or legs.

Person riding , leading, or touching horse or other animal.

It also states “ As well as the physical sensation of the microshock, microshocks could in some circumstances give rise to further effects, either if the shock causes a person to startle with dangerous consequences, or if repeated cause aversive responses to the situation that produces them.”

“Microshocks depend on the sizes of the objects concerned as well as the size of the field, so there is no threshold for electric field for the preventing microshocks. However , in many circumstances the risk of perceiving a microshock and its severity diminish significantly as the field is reduced below 5Kvm -1, the reference level in the ICNIRP guidelines “

These guidelines are for the public and not for horses which can be 500kg+ , with four metal shoes. These guidelines clearly show that the risk is still there.

For us the EMF may still be over the guidelines as the wires are still the standard height, so for horse and rider wellbeing and safety we will not be able to use our paddock safety.

The fact that NG are putting the line through our paddock is not voluntary for us.

NG own survey highlighted that the line should avoid the paddock, was this to do with microshocks ?

Continued lack of engagement with UKPN.

We met up with UKPN on site on the 12th of May as well and have heard nothing from them since.

We had earlier met up with the contractor at our land agents.

They asked us when would be a suitable time to underground the 11KVA cable through our yard, it may take 5 weeks to carry out the undergrounding.

Unfortunately, there is no suitable time as it's a working farm and the farm yard is small with the undergrounding stopping the yard from being used for HGV lorries.

It runs in front of our only grain store.

The only answer I could give is Christmas.

The OHL runs up the farm drive and then underground between the house and garage and back over ground from the pole at the back of the garden and then continues over to Silver End.

When we had the meeting we found out why the undergrounding had been moved from following the line from behind the house which we thought was the plan before July 2025.

UKPN gave one reason for the change that they did not like the cable being underground between the house and garage, I then questioned was this because there was no easement for this underground cable? We are still awaiting an answer.

Anyway, we offered to route the new undergrounding cable along a new route around the edge of the garage and then it could join up with the original planned undergrounding.

This would be quicker, cheaper and significantly reduce harm to our business.

Unfortunately UKPN told us that would be outside the DCO and NG would need to approve.

We have not heard anything, why would we as once the secretary of State approves it they will have the powers and we will have to take it to Court to put in this alternative, simpler route.

All of this could have been avoided if we had had a site visit before the Draft Order was set.

A common theme here.

NG are telling us we will be able to claim injurious compensation if proven.

This will be difficult to calculate exactly and to prove, though the stress and anxiety this will cause will be immeasurable and severe, it is already doing so just with the thought of having to virtually shut the farm down for an undefined period of time.

RVAA

Our frustration is the accuracy of the information that NG may have used when they made the assessment whether it was breached.

The main ones are that I had to point out that we have views of the project from three elevations and not two.

Looking at the field study we have realised that according to NG this was carried out in Winter 2025, this in practice is between 21/12/2025 and 20/03/2026.

This is actually after the DCO was submitted, I guess another mistake.

When I asked at the previous hearing I learned that it would have been from the public access area like a footpath.

We want to know if this was carried out correctly. We need to see evidence of the field survey especially as the date NG will now claim is another one of their many mistakes, I would expect there to be photographic evidence to show us along with the report .

For the assessment, looking at the response in the recent hearing to Bobby Brown from BDC, NG used the term of the effects in the round from LITGN219. This is in the glossary of terms that is referred too.

This is the guidance NG have used for the RVAA.

It's interesting to look at page 10.

4.10 The existing (or baseline) visual amenity of a residential property should be described in terms of the type, nature, extent, and quality of views that may be experienced 'in the round' (see glossary) from the dwelling itself, including its 'domestic curtilage' (domestic gardens and access drives).

On page 16

'In the round' 'In the round' means the combined or all-round visual amenity experience at, or from a property. Visual amenity is "the overall pleasantness of the views they enjoy of their surroundings" (paragraph 2.20, page 21; GLVIA)

I do not recollect views from our garden being mentioned, if they were please can NG highlight them?

For views from the house we will be able to see the project from every room except our bathroom, which has frosted glass.

The other issue is the assessment is supposed to be from our curtilage according to NG.

This a copy of the planned submission that Roise Pearson from Pylons East Anglia Ltd

At ISH 4, it was stated by the Applicant that the distance measured should be from the curtilage and not the property centre, as evidenced from the [transcription](#):

00:33:01:16 - 00:33:38:11 There would be or not. But what I would say is that in undertaking the work that we did, both desk based and field based. We took in consideration properties around the margin of that 200 meter zone. We also took into account guidance to the landscape Ministry guidance, which specifically said about overhead lines that 150m was the limit from which the threshold could be breached. Um, so my, uh, answer would be that it's very unlikely there would be other properties like that.

00:33:38:13 - 00:33:54:29 That's not to say, though, that there and again, written in our work, that there may be properties upon which there'd be a high magnitude of effect

occurring in, in that zone, that the thing that is unlikely is that that would break, that those would break the threshold.

00:33:56:18 - 00:34:15:24 Understand? Thank you. Um, and the measurements for the 200m cut off, if you like. Is that taken from the curtilage of the affected properties, then Hilda for the applicant. Yes. We're very acutely aware that it's gardens, driveways, suchlike which are equally important to receptors in this regard. So it's taken from the edge of the curtilage. Okay. Thank you.

I have subsequently referenced the [Works Plans \(Section F\)](#) and the [RVAA document](#), which also states that:

LI TGN 2/19 defines Residential Visual Amenity as 'the overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage' (LI TGN 2/19, Page 3, Para. 1.2)1 .

The first time the distance from our curtilage was mentioned was when NG actually stated that due to the Lod the nearest pylon is 70m from the garden.

Looking at some of the inaccuracies NG have used to make their assessment and back up their assessment, I have listed below to emphasize NG's lack of accuracy.

APP233

Page 87 (Initial assessment by NG)

We accept the description, but the measurement is 175m, this is we have tried to access and would likely be from the centre of the house to the centre of the pylon.

Page 165 (further assessment)

Distance 164m.

The trees referred to is actually a tall old deciduous hedge, but the evergreen hedge is not continuous.

Views of TB99 from the south west facing elevation are to the left and not the right.

There would be little filtering of views from the garden of TB99.

The conclusion.

We do not agree that only the first floor windows would have direct views of the closet pylon.

The reference to closing the curtains may be correct in the winter months but in the summer months when daylight hours are longer curtains are barely drawn , so that assumption is not correct.

The build form referenced can only be the horse stables which is not in direct line of views from the house to the pylon, it is only about 4m high compared to a pylon that

could be nearly 60. The opinion that the slightly more distant view of the pylon reduces the perceived height of the pylon is a complete load of rubbish.

The views of the project will be overwhelming and dominant in its surrounds and will mean that the quality of life living in such an open and pleasant back drop will be lost.

The overall consideration strongly considered the distance from the pylons as being one of the considerations that there was not a breach, the other reason was the oblique view, the view is not oblique from the rear elevation and its patio.

My submission REP1- 380

I questioned if the Lod should be considered along with the assessment to the closest part of the pylon and from the curtilage.

NG response REP2-28

NG ignored my comments but just repeated that there was no breach, they did confirm that there will be clear views of TB98 and a high magnitude of visual change

My submission Rep2 086

I questioned the varying distances referred to in the applicants references to the nearest pylon of 175m, 165m and 158m could be accounted for whether is the centre of the pylon or the conductor.

NG response REP3-073

Even with the Lod NG did not agree that the pylons would be dominant in views, also their proposal is not consistent with planning policy noting that there is no minimum distance specified in guidance.

NG response REP4-298 to my submission REP3-139

NG for the first time references the distance for the Lod of 90m from the building and 70m from the garden.

The edge of the garden is actually 30m from the house in the direction of pylon TB98, the closet pylon.

NG claimed the project would be visible from only two elevations.

NG response to 8.9.1 Applicants Response to first written questions .

NG response to BDC questions on RVAA now states that the from elevation faces away from the project which is not correct and has the benefit of "*intervening elements of screening*" , earlier it referred to screening being limited or there will be clear views.

NG response REP5-194 to my submission REP4-405

I had questioned the method of assessment along with whether the proposed visualisation would be accurate.

NG referenced where details of the field work could be found.

This is where the winter 2025 is shown for the field work. They also highlighted that they make *“A reasonable assumption has been made that the most important views from all properties assessed would be from the main living spaces which are used during the day.”*

How can they make this assumption without visiting each property ?

I had questioned why NG had included a planned solar panel farm that cannot be seen from our property and is over a km away. NG have justified its inclusion *“in this case , given the expected visual envelope surrounding the solar farm , it was considered appropriate to reference this scheme “*

This inclusion just emphasises NG’s aim to mislead everyone.

Visualisations

NG Response in REP5-194 to my question of visualisations for worst case scenario and if they will be accurate.

NG Response was *“ Worst case scenarios will be illustrated within the additional visualisations for Step 4 properties, whereby the extents of the Limits of Deviation corridor will be shown, and these will be made publicly available via the Planning Inspectorate, following Deadline 5 in 8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations.”*

Looking at these visualisation they do not show the worst case, they are as planned.

This is demonstrated by the details along the bottom of the image show the nearest pylon is 175m and its height is as planned not the extra 6m extra height it could be.

NG again are completely misleading everyone and are hoping to persuade affected parties with lies.

Noise

In the Issue specific hearing of the 24th June 2026 the KC for the applicant Mr Harris stated *“I can go into the only evidence before you establishes that much of the relevant construction phase will take place in rural area where there are few receptors and no likelihood of noise and disturbance.”*

We feel this is not correct and we questioned that in REP4-405, NG have responded in REP5-194 to my submission as below.

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“Baseline noise levels in the vicinity of Whiteheads Farm are low, typical of a rural area. This is demonstrated in 6.14.F1 Environmental Statement Figure 14.1 - Baseline Noise Data [APP-262] page 17, which shows that the property is located away from main transport routes and outside of the Department for Environment, Food and Rural Affairs noise mapping contours. Based on this low noise baseline, the lower thresholds for potential significant adverse effects from construction noise have been used, based on the Category A thresholds from the ‘ABC’ method described in Annex E.3 of British Standard 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise 14. The use of the lower threshold, suitable for quiet rural areas, is described in paragraph 14.4.17 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP 256].”

“The thresholds for potential significant adverse effects, based on the Category A thresholds, are described in Section 14.4 of 6.14 Environmental Statement Chapter - 14 Noise and Vibration [APP-256] (specifically Table 14.3).”

“The threshold for potential significant adverse effects during:

- Weekday daytime periods (07:00 to 19:00), and Saturdays (07:00 to 13:00) is 65 dB LAeq,T*
- Weekend daytime periods (excluding the Saturday period above) and evenings is 55 dB LAeq,T*
- Night-times (23:00 to 07:00) is 45 dB LAeq,T.”*

“The highest cumulative construction noise level at Whiteheads Farm, excluding mitigation, is 64 dB LAeq,T. This assumes all activities are occurring simultaneously (including the undergrounding of the UKPN line), with worst-case (noisiest) potential task and methods being used, without mitigation. It also includes noise from construction traffic on the haul road, which is predicted to be less than 55 dB LAeq,T, without mitigation.”

“64 dB LAeq,T is therefore a worst-case noise level. For the purposes of the assessment, it is assumed that the duration may exceed 10 days in 15 consecutive days. However, because the weekday daytime noise level threshold is not expected to be exceeded (even based on the worst-case assumptions), this does not constitute a potential

significant effect irrespective of the duration. There is potential exceedance of the weekend threshold without mitigation. However, with mitigation this is not expected to be exceeded. Should it be exceeded, based on the detailed assessments to be undertaken by the contractor, including mitigation, temporal restrictions may be put in place to ensure significant adverse effects do not occur. tial significant effect irrespective of the duration.”

“With refinement of the plant assumptions (e.g. the use of quieter methods) and including mitigation measures, noise levels would be lower.”

“Construction noise levels would likely exceed the existing ambient noise level and be audible at Whiteheads Farm. This in itself does not constitute a significant adverse effect, but would constitute an adverse effect.”

“For clarity, noise mitigation measures will be incorporated into all works (including those near Whiteheads Farm), and not only those where the threshold is expected to be exceeded. This is secured via commitment NV01 of the 7.2 Code of Construction Practice [Revision E].”

“Commitment NV05 requires that the contractor conduct a detailed construction noise and vibration assessment and update the Noise and Vibration Management Plan, detailing proposed mitigation measures, prior to the commencement of construction.”

I do not agree with these figures, but they seem chosen to satisfy NG claims and will lead to the contractor being able to avoid restrictions or mitigation.

Just looking at the 64 dB NG are claiming.

The UKPN works through the farm yard will be less than 15m from the garden and less than 35m from the house.

This will mean digging a trench and breaking through concrete.

Another noise will be the chainsaw work required to remove the trees and cut down the hedges behind our house and garden.

This will mean working about 30m from our garden.

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For the pylon construction the area used for the construction for the pylons is not given, but even if only 30m by 30m would mean the construction area is 75m from the house and less than 55m from the garden if using the Lod and could be around 145m from our house and around 115m from our garden.

Just looking at the chart A14. 1.2 in APP 262.

Pylon construction will be over 65dB if closer than 111m, and around 70 dB if around 70m.

If the pylon is as planned

For the UPKN works the back filling trench exceedance over 65 dB would be within 47m.

For some unknown reason chainsaws have not been included on the noise tables ,it would appear with some research at around 100m the noise level is expected to be between 65 dB and 80 dB

There could also be the cumulative effect which would as a rule of thumb add 3 dB.

NG claim of 64 dB is difficult to believe, NG claim mitigation is only referenced when questioned because of the Lod.

For the haul road which is less than 200m from our house and is probably around 180m from the house, looking at the Table 14.1.2 for Temporary access routes at 200m it 56 dB.

This noise from the haul road will be even louder in the garden.

It is noted in REP4-164 Construction Hours 2.2.5 *“Unless otherwise agreed with the Local Highway Authority, no Heavy Goods Vehicle (HGV) deliveries would be made to site outside of the hours of 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays.”*

That would mean the haul road will have a potential on Saturday afternoons to be over the 55 dB, this is without any cumulative affects which is different to the applicants claim.

Concerning the start-up and close down it was suggested that at the hearing that some Councils will accept 50 dB , we strongly oppose this and it must meet the “ABC” thresholds of 45 dB.

Working Hours

NG claim that their work force work 7am to 7 pm.

If this is the case the start up of 6am is not needed and will not lead to any extension to the project finish date ?

In terms of weekend works this must be avoided, the increase of noise even at the 55 dB level will be a significant increase of around 20 dB, there is a need for local residents like us to have at least some respite.

NG claim that they are using the “ABC “ method of noise assessment, but looking at “Jasmine Cottage “ NG are using the increase in noise of over 10 dB as the reason for Adverse Significant effect. We will be having around double this even on weekends.

Farm Safety

In NG response REP5 -194 to my submission REP4-405, the applicant has made the claim for line safety clearance that combines can pass safely underneath .

They also state “ Safe systems of work are expected to be implemented by third parties whenever they are near overhead lines to protect equipment and to protect all persons and animals in the area of the lines”.

This will not be the case, the highest point of the largest New Holland combine is 6.56m and with the safe clearance given being 4.3m , the 9.9m line clearance given for our farm is over a metre below what would be needed.

NG will undoubtedly make the same claim as they have for aviation that if it's unsafe farmers will be restricted to not growing combinable crops under the lines or take a risk to not pass directly under the lines.

There is at present an average of one incident a day of farmers having accidents with power lines.

For a farmer it will be difficult to assess the lowest point of a line, nothing has been shown what is the expected line sag and how it differs at different temperatures.

Have the latest record temperatures and their potential increase been taken into account ?

Assessing the lowest point of the line on the day of combining is going to be difficult.

Trees

Looking at the initial maps for section E there were around 150 individual trees affected.

They were telling us for this section in APP 256 Page 15 that in Section E 8 trees and 1 group of trees are to be removed.

I see they have modified the map, it's now on REP1.065 , I have not noticed revised figures.

In response to my submission REP4-405 questioning the trees removed on our farm between TB96 and TB97.

NG response in REP-194 *“The trees between TB96 and TB97 have been predominantly categorised as low quality, with seven trees of moderate quality unaffected by the Project, labelled as T826–T832 in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065].”*

I have attached a photo which shows the trees that will be removed in the field corner between TB97 and TB 96 and are classified as low quality and will not be part of the trees that NG classified that they will plant 3 for 1.

As can be seen from the photo at least a few of these trees should be categorised as moderate quality

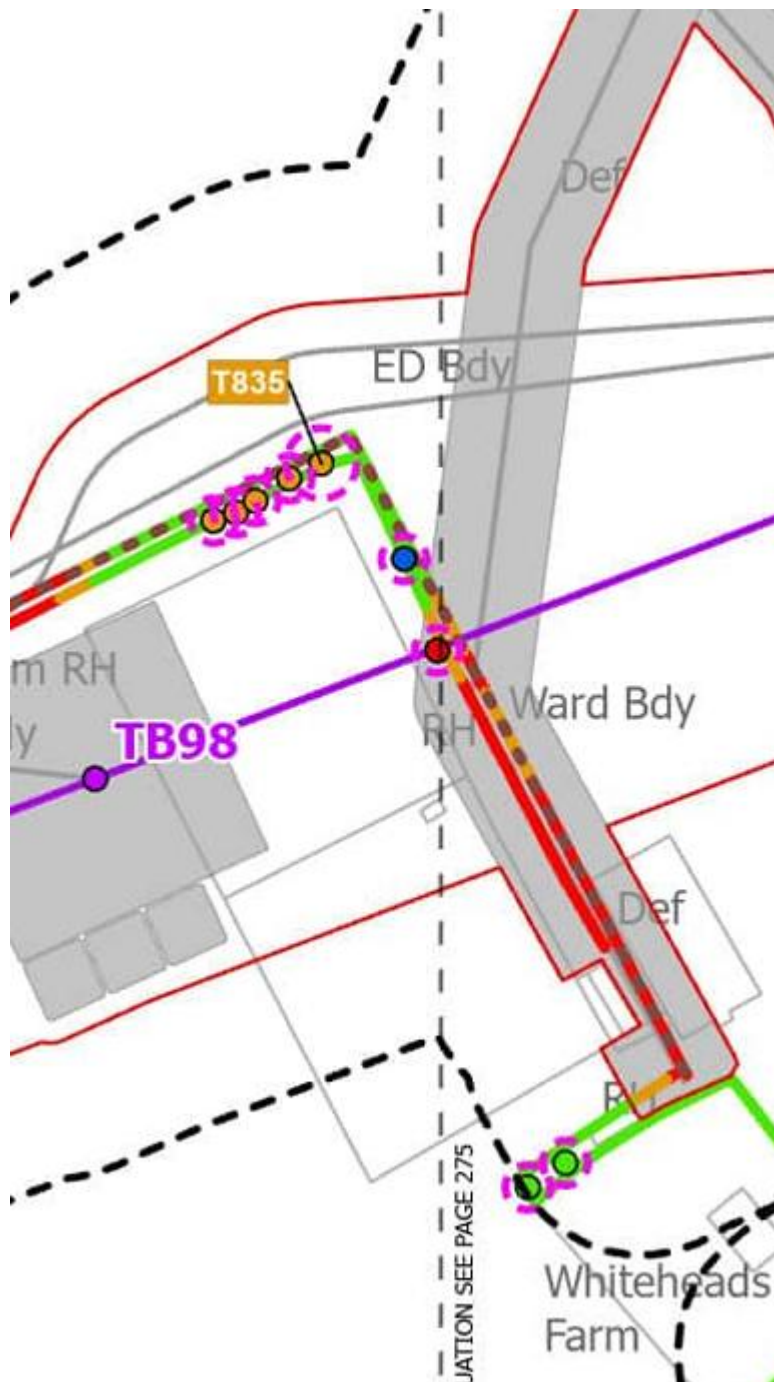


There are also additional trees that will be removed unnecessarily.

Looking at the map REP1-065, the plan shows trees and hedge removed along the line running where the UKPN OHL is being removed as shown below.

The original plan was to remove the OHL and underground it, at present it is only being removed.

Whatever the situation is, there is no need to remove the hedge nor trees.



Crossing Points.

We discussed crossing points when we meet FG on the 25TH February and ran through where they should be.

On the site visit with NG on the 12TH May we had expected confirmation of these.

Instead NG gave us no indication of their views on them.

The follow up email of the 23rd of June still did not indicate that crossing points had been agreed, instead it would appear that there was no communication with FG on our visit in February.

This is demonstrated below in an extract from the most recent email from NG.

- We await a plan with your agent's comments on suitable crossing point locations.

REP3-016 4.2 Funding Statement (Tracked) (Final Issue C

From this document

4. Land Acquisition

4.1.2 National Grid has published guidance, titled Guidance on Land Rights for New Electricity Transmission Assets (National Grid, 2011), which sets out how it will seek to obtain, from the very outset of a project, by negotiation, permanent and temporary land rights for all new electricity transmission assets. National Grid seeks to reach early agreement with all landowners.

For this project this is definitely not the case.

Conclusion

NG in the response REP5-194 make claims for noise at Whiteheads Farm which I question, please could NG substantiate their claims by showing their calculations and whether it is from curtilage?

The RVAA assessment field studies carried out in Winter 2026 were after the DCO was submitted.

The worst case scenario visualisation is not correct as the visualisation shown is for the pylons original planned position with no LoD.