

Introduction

Firstly, I would like to thank the Examining Authority for taking the time to read this submission and to carefully consider the views of my family throughout this examination.

Since this process began, National Grid has undoubtedly increased its contact with us. We have attended a number of meetings and have always been willing to engage constructively. I welcome the opportunity to meet and discuss the project, and I have never refused to do so. However, my experience has been that there is an important difference between holding meetings and genuinely engaging with landowners. Meaningful engagement is not measured by the number of meetings that take place, but by whether concerns are listened to, questions are answered in a timely manner, and discussions lead to practical outcomes.

The purpose of this submission is not to revisit every issue that has arisen, but to demonstrate a consistent pattern. Throughout this examination, National Grid has repeatedly stated that it is engaging openly and transparently with affected landowners. My experience has been very different. The following examples explain why I believe there is a significant gap between what National Grid says it is doing and what has actually happened in practice.

At the time of writing, we have another meeting scheduled with National Grid on 5 August 2026. I sincerely hope it proves constructive and addresses a number of the outstanding issues. However, based on my experience so far, I am concerned that while some existing questions may finally be answered, new ones will inevitably arise, and those may again take weeks or months to resolve.

Response to National Grid responses

We held a meeting on 1st June with National Grid and asked several questions, along with finding out responses from our previous meeting. During that meeting, we were given some verbal answers to our questions and were told that full written responses would be sent by email. At our next meeting, on 9 July 2026, some of those answers were repeated verbally, but the written responses did not arrive until 21 July 2026. Even now, many of the issues raised during the 9 July meeting remain unanswered.

From my perspective, National Grid appears to be continually delaying responses. Many of the questions we have asked are directly relevant to the Development Consent Order process, and by delaying answers until after key deadlines or hearings, we have less opportunity to properly consider the information and respond. It feels as though the can is simply being kicked further down the road.

In REP7-482, National Grid states that responses to the questions raised at the 9 July meeting "are being drafted and will be provided in due course." At the time of writing, almost a month has passed since that meeting, and we are still waiting.

On page 82, National Grid states:

"The Applicant's agents are preparing the large-scale maps at the request of the landowner, and these will be sent via post in due course."

These maps were requested at our meeting on 1 June 2026. More than two months later, they have still not been provided.

The same page also states:

"The point around ownership is being addressed between the parties, as the documents issued to date were aligned to the Land Registry records."

This is simply not correct. The draft Heads of Terms were prepared in the wrong name and did not reflect the Land Registry records. I have since provided a letter from my solicitor explaining the correct ownership position, yet I have still not received any response from National Grid.

Page 82 also refers to the impact on [REDACTED] and relies on a desktop assessment. As I explained in my previous submission, National Grid has never explained how it assessed the impact on the interior of the house. If it does not fully understand the internal layout or how the house is used, how can it carry out a meaningful assessment of the effects on the property?

During the Issue Specific Hearing, National Grid made comments about individual rooms within the house. Such statements suggest that evidence exists to support those conclusions. However, despite repeated requests, no such evidence has been provided. Instead, National Grid continues to rely on a document that says nothing about the interior of the property.

On page 83, National Grid states:

"The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders..."

This has not been my experience. As I explain elsewhere in this submission, particularly in relation to the proposed pre-entry works, there has been no transparent engagement. If National Grid genuinely wanted to engage with me, why did it choose to serve notices rather than answer straightforward questions? In reality, I receive more meaningful responses through National Grid's submissions to the Planning Inspectorate—where it is required to answer my points—than I do through direct engagement.

On page 84, National Grid states:

"The Applicant respectfully disagrees with the comment that they have not been engaging positively with the landowner..."

The Applicant points to meetings that have taken place and says that answers were provided verbally on 9 July, followed by an email on 21 July. However, simply holding meetings is not the same as meaningful engagement. Waiting five months for answers to important questions cannot reasonably be described as positive or proactive engagement.

Finally, on page 85, National Grid states that the draft Heads of Terms reflected the ownership recorded by the Land Registry and that discussions are continuing to ensure the correct land interests are identified.

If that is the case, I would welcome National Grid producing the Land Registry documents that show the land registered in the name of [REDACTED]. To my knowledge, that will not be possible, because the land has never been registered in his sole name. Indeed, since the

ownership was previously registered in the name of [REDACTED], National Grid's explanation does not withstand scrutiny. The issue is not one of the Land Registry records being unclear; it is that the draft documents were prepared incorrectly despite National Grid being provided with the correct ownership information, including confirmation from my solicitor.

In REP7-482, on page 47, National Grid states that the revised licences would be signed that week. I would like to explain what actually happened.

I first saw the licences at our meeting on 9 July 2026. During that meeting, I immediately pointed out several significant errors. One licence had been prepared in my father's name, despite him never having owned that land. The licences also included land that we no longer owned, even though National Grid had been aware of this since April. In addition, they still referred to boreholes, despite those having been removed from the accompanying plans.

The following day, I received a phone call from Fisher German to say that the licences were ready to sign. However, when they were sent to me, they were exactly the same documents containing all of the errors I had identified the previous day.

It eventually took four revisions over a period of two and a half weeks before the licences were finally corrected. Throughout that time, I was repeatedly told that they needed to be signed urgently, despite explaining that my land agent was away on holiday and that I wanted her to review them before I signed anything. Fortunately, because the licences required so many amendments, I did not receive the correct versions until after she had returned.

All of this was happening while Section 172 notices had already been served on my land. As I have explained elsewhere in my submissions, those notices were themselves served incorrectly. That means National Grid has now incorrectly served three out of three notices relating to my land. It is difficult to accept that this can simply be dismissed as an administrative error. A single mistake might be understandable, but repeating the same errors on three separate occasions suggests a pattern rather than an isolated oversight. Had these issues not been challenged, I believe National Grid would have continued to rely on those incorrectly served notices.

The notices and the licences all stem from a question I first raised on 25 February 2026 regarding the proposed boreholes. More than five months later, I am still waiting for a proper answer, I have highlighted more detail below.

During earlier Issue Specific Hearings, National Grid argued strongly that delays in decision-making by local authorities were unfair and emphasised the importance of keeping to timescales. However, when it comes to responding to straightforward questions from affected landowners, the same sense of urgency appears to disappear. It is difficult to understand why prompt responses are considered so important when they affect National Grid, but not when they affect the people whose land and livelihoods are directly impacted by the project.

This continual cycle of errors, delays and repeated corrections has created unnecessary stress and uncertainty. It has also had a real impact on my wellbeing. Much of this could have been avoided through better communication, greater attention to detail, and a genuine commitment to resolving issues promptly rather than allowing them to drag on for months.

Boreholes

National Grid requested a meeting with us on 5 August but did not explain what the meeting would be about. I have since been informed by an unrelated third party that one of the subjects is expected to be the borehole issue.

Coincidentally, on 4 August I received an update from Anglian Water, which I have attached to this submission. One section is particularly relevant. Anglian Water states:

"As a result of the above legislation and the current BAS scheme standard and considering all of the information provided, the conclusion is that:

The exclusion zone of 50 metres would have to be put in place and biosolids cannot be spread within that exclusion zone as there is no current differentiation on type of borehole and no allowance/reference for decommissioned boreholes in the current legislation or BAS standard."

This confirms the concern that I have been raising since February. Under the current legislation and BAS scheme standards, a 50-metre exclusion zone would apply, preventing the spreading of biosolids within that area.

I expect National Grid may argue that the impact is less significant because legislation or guidance could change in the future. They may also suggest that, because the boreholes will be backfilled once the investigations are complete, the restrictions would no longer apply. However, the information I have received from Anglian Water makes it clear that the current BAS scheme standards make no distinction between active and backfilled or decommissioned boreholes. Under the current rules, they are treated in the same way.

We cannot make decisions about our farming business, or accept permanent impacts on our land, based on the possibility that legislation or industry guidance might change at some point in the future. We have to base decisions on the legal and regulatory framework that exists today, not on speculation about what may happen tomorrow.

Throughout this process, I have consistently made it clear that we are not trying to obstruct National Grid or delay the project. We are simply trying to ensure that our farming business is not left worse off as a result of boreholes being installed on our land. I believe that is an entirely reasonable position for any landowner to take.

If National Grid considers that possible future changes to legislation should carry weight, then that principle could be applied to almost every aspect of this project. Future governments may change policies, legislation may be amended and industry standards may evolve. However, the Examination should be based on the facts, legislation and guidance that apply today, rather than on assumptions about what may happen in the future.



in terms of the borehole queries there are two slightly separate issues at play:

1. the type of borehole
2. any exclusions for decommissioned/capped boreholes.

1. Borehole type

The Biosolids Assurance Scheme (BAS) standard currently has different restrictions around the storage of biosolids depending on whether a borehole is used to supply water to people or not see below snippet for details.

3.10 MS24	Biosolids in temporary field stores must be stored further than 10 metres from any spring or well, or from any borehole not used to supply water for domestic or food production purposes (Environmental Permitting Regulations, S2 storage exemption).
3.11 MS24	Biosolids in temporary field stores must be stored further than 20 metres from any borehole used to supply water for domestic or food production purposes (Environmental Permitting Regulations, S2 storage exemption).

Regarding buffers when applying biosolids, the 50-metre restriction applies where the borehole is "used for human consumption or dairies".

The administrators of the BAS scheme, Assured Biosolids Limited (ABL) will be consulting on updating the BAS Standard (and associated documents) and one of the proposed changes is that the 50-metre buffer when applying biosolids will apply to all boreholes, not solely those used for human consumption or dairies. There is no proposed change to the restrictions around storage, except on the nature of boreholes - more on this below.

Whereas, under the [The Reduction and Prevention of Agricultural Diffuse Pollution \(England\) Regulations 2018](#) also known as the Farming Rules for Water, the 50 metre buffer applies to a spring, well or borehole with no definition of what it is used for see snippet below for details.

Applying organic manure near a spring, well or borehole

6. A land manager must ensure that organic manure is not applied to agricultural land within 50 metres of a spring, well or borehole.

2. The nature of boreholes

There is a difference between the requirements in England/Wales and Scotland within the current BAS Standard. Again, this is an area that ABL are looking to address in the proposed update to the BAS Standard (and supporting documents) by introducing a definition of boreholes that differentiates between boreholes that allow access to the underground strata and those that do not (i.e. the intention is that the restrictions will not apply when a 'borehole' has been (for example) capped).

As a result of the above legislation and the current BAS scheme standard and considering all of the information provided the conclusion is that:

The exclusion zone of 50 metres would have to be put in place and biosolids cannot be spread within that exclusion zone as there is no current differentiation on type of borehole and no allowance / reference for decommissioned boreholes in the current legislation or BAS standard.

In terms of timescales of when BAS standards might be revised the current expectation is that there would be a consultation in line with the Assured Biosolids Limited (ABL) [ABL_BAS-Consultation-Protocol](#) this calendar year, with any approved changes to the scheme standards coming into force early next year allowing for any implementation plan / period. Though at this stage in relation to any proposed borehole changes an implementation period is not thought likely to be required.

Hopefully, the above is helpful in the short-term, but the future proposed changes to the BAS scheme (assuming they're approved) should definitely help once a new version of the BAS Standard comes into force.

Environmental Mitigation

Furthermore, in document REP7-482, page A4, National Grid states:

"As pointed out by Charles Micklem [REP6-183], landowners are well placed to help deliver such measures and are willing to do so because they understand the opportunity on their land."

This is only partly correct. We are willing to help, but only if National Grid genuinely engages with us. We first need to understand what National Grid is trying to achieve and why particular measures are being proposed. If those objectives align with our own priorities for the land, then we are more than willing to work together. However, being presented with proposals that have already been decided, without any meaningful discussion, is not a constructive way to begin.

Simply drawing attractive lines on a map without speaking to the landowner creates unnecessary uncertainty and stress. For example, am I expected to lose productive arable land because National Grid has decided to divide a field with pylons and a new hedge? Can I continue to grow cricket bat willows if enhancement planting is proposed along the waterways? These are practical questions that directly affect the future management and viability of the estate, yet they have never been discussed with me.

There are also long-term costs and responsibilities that appear to have been overlooked. Planting hedgerows is not a one-off exercise; they require annual maintenance long after National Grid's five-year commitment has ended. Hedges need cutting every year, at a significant cost to the landowner. Likewise, if trees are planted alongside roads, who is responsible if one falls and causes damage or injury? Does that liability remain with National Grid, or does it become the responsibility of the landowner? These are important issues that need to be agreed before any planting takes place.

This is precisely why meaningful engagement is so important. Landowners have the local knowledge to help design mitigation that works for both the landscape and the farming business. However, that can only happen through open and constructive conversations before proposals are developed, not after they have already been drawn on a map. If National Grid genuinely wants landowners to support and deliver these measures, it must involve them from the outset and work with them to develop solutions that are practical, sustainable and mutually beneficial.

Pre entry works

National Grid has repeatedly said throughout this process that it is engaging with landowners. It has made the same claim in relation to the proposed pre-entry works, stating that it wants to work with affected landowners. Unfortunately, this has not been my experience.

As the landowner, I have not been provided with any detailed information about these works by National Grid. Instead, I only became aware of the proposals through a letter that had been sent to a local resident. It is difficult to understand how this can be described as meaningful engagement with the landowner.

I raised this issue at my last meeting with National Grid. The conversation seemed positive, and I left with the impression that they would engage with me before any applications were submitted. However, nothing of substance was shared, nothing was agreed, and I heard nothing further. The next communication I received was on 2 August 2026, when National Grid informed me that the planning applications had already been submitted.

I struggle to see how this can be considered engagement. If National Grid genuinely wanted to work with landowners, I would have expected to be shown the detailed plans before they were submitted. That would have given us the opportunity to discuss the proposals, raise any concerns, and see whether a solution could be found that worked for both parties. Instead, the only information I have seen is a broad overview that was circulated to local residents, rather than the detailed plans affecting my own land.

Once again, National Grid's actions do not match its repeated claims that it is engaging with landowners. Meaningful engagement should involve open discussion before decisions are made, not informing the landowner after the applications have already been submitted.

Heads of Terms

With regard to the Heads of Terms, we have been told that, as landowners, we should receive them this week. However, based on my experience to date, I have little confidence that they will be accurate, as many of the legal documents produced so far have contained significant errors.

I am also concerned about the timing. By issuing the Heads of Terms after the deadline for comments to the Planning Inspectorate, National Grid has removed the opportunity for landowners to raise concerns about them during the examination. Whether intentional or not, this has the effect of limiting scrutiny of these documents and leaves landowners feeling that they no longer have a voice in the process.

Throughout this examination, it has often felt as though the most meaningful responses from National Grid have only come when issues have been raised through submissions to the Planning Inspectorate. Direct engagement has too often resulted in delays or unanswered questions. That is disappointing, because meaningful engagement should not depend on the intervention of the Examining Authority; it should be part of National Grid's normal approach to working with affected landowners.

[REDACTED]

[REDACTED] is a Grade I listed house, surrounded by four Grade II listed buildings, a Grade II Registered Park and Garden, and a Conservation Area. These are all nationally important heritage assets. Despite this, National Grid appears to believe that the impacts on these assets can be properly understood through a desktop assessment alone. As I have explained above, National Grid has been unable to provide any evidence to support statements it has made about the house. For example, in the *Transcript of Issue Specific Hearing 2 (ISH2) – Day 2 – Part 5*, National Grid stated: "...we have had regard to the use of the house and it is our understanding that there are no significant rooms designed to have group functions, such as drawing rooms or long galleries, on an upper floor from which views might be a significant consideration." (Page 10) This was repeated in Document 8.5.7, *Applicant's Written Summary of Oral Submissions to Issue Specific Hearing 2 (Final Issue A)*: "On the basis of desk-based research the Applicant understood that there are no significant rooms designed to have group functions, such as long galleries, on an upper floor from which views might be a consideration in general terms." (Page 51)

I have repeatedly asked National Grid to provide the evidence that supports these statements, but none has been forthcoming. If it cannot explain how it reached these conclusions, it is difficult to have confidence that it has fully understood the impact of the proposals on the house or its setting.

The same issue arises elsewhere in the assessment. National Grid's desktop survey refers to the cricket bat willows simply as "trees", rather than recognising that they are a commercial crop which forms part of the farming business as well as contributing to the landscape. Since I highlighted this error, has National Grid returned to carry out a more detailed survey to identify how many of these trees are cricket bat willows? Or is it continuing to rely on the original desktop assessment, despite knowing that it contains inaccuracies? This raises a wider concern about the reliability of the assessment process. If National Grid is prepared to rely on assumptions in one area, how many other conclusions are based on incomplete information?

Using the borehole issue as an example, National Grid may argue that future changes to legislation could reduce the impact on our farming business. However, if it is acceptable to rely on assumptions about what might happen in the future, then the same logic must apply elsewhere. For example, if disease were to affect the cricket bat willows in the future and they could no longer be grown, the existing screening they provide would disappear, leaving the pylons far more exposed in the landscape. Clearly, it would not be appropriate to assess the project on the basis of such speculation.

The assessment should therefore be based on the circumstances that exist today, using accurate and up-to-date information rather than assumptions or hypothetical future scenarios. That is the only way to properly understand the true impact of the proposals on [REDACTED], its heritage significance and the wider landscape.

Conclusion

Firstly, I would like to thank the Examining Authority for taking the time to read my submissions and to consider the points my family and I have raised throughout this examination.

If there is one message I hope you take away from my evidence, it is this: National Grid repeatedly says that it is engaging with landowners, but in my experience there is a significant difference between holding meetings and genuinely engaging. Meaningful engagement is about listening, responding, and working together to solve problems. It is about having honest conversations where both sides can influence the outcome before decisions are made. Unfortunately, that has not been my experience.

Over the past few months, we have attended numerous meetings, raised detailed questions and provided information whenever it has been requested. Yet we have often waited weeks, and sometimes months, for answers. Some questions remain unanswered today. During that time, important decisions have continued to be made, planning applications have been submitted, legal notices have been served and documents have been drafted incorrectly. The delays, mistakes and lack of communication have created unnecessary stress and uncertainty for my family. Much of this could have been avoided through timely responses and genuine collaboration.

Throughout this process, I have never refused to engage. In fact, I have consistently offered to work with National Grid to find practical solutions. Whether it is discussing tree planting, pre-entry works or access arrangements, I have always been willing to have constructive conversations. However, meaningful engagement only works when both parties are involved before decisions are made, not when landowners are informed after the event.

My hope is that the Examining Authority will look beyond the number of meetings that have taken place and instead consider the quality of the engagement. Meetings alone do not demonstrate meaningful consultation. What matters is whether concerns are listened to, questions are answered in a reasonable timeframe, and landowners are genuinely involved in shaping proposals that affect their homes, businesses and livelihoods.

That, unfortunately, has not been my experience throughout this process.