

John Stacey



Interested party : 

Further Submission dated 04/08/2026

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This response is to my submission REP6-212.

Engagement.

NG Response in **REP7-481**

“The Applicant met with the AP’s agent on 15 July 2026 and discussed the AP’s concerns at length. The Applicant is engaged in dialogue on the appropriate mitigation measures and in reaching a solution.”

My Response

NG have had 4 years to engage in dialogue, there has been no engagement, instead the meetings with Fisher German have never been productive as they were only in listening mode.

It is difficult to understand why we did not have any direct response or answers to the meeting we had with NG on the farm on 12th May 2026, this was after the meeting held with Fisher German in February 2026 which we had discussed many issues and had left Fisher German seeking answers from NG.

Their follow up email of the 23rd June told us nothing.

The meeting on the 12th May with NG should have been an opportunity for direct interaction but was not .

After the meeting our agent had with NG in July we are now having to pursue quotes for putting our horses on livery, a wholly unsuitable situation.

Unfortunately as a farmer this time period is harvest and obtaining quotes during summer holidays delays matters further.

Any decision we get from NG concerning the position of re homing our horses may not be decided until after the inspectorate have made their decision.

Microshocks

NG have commented in their response **REP7-481**

“The fact that horses do not have insulating shoes, like humans may wear, means that any charge collected on the horse can dissipate to earth more easily, reducing the risk of microshock occurring in general.”

When horses trot, canter and gallop all four feet are off the ground at times so would in fact lose the grounding effect of the metal shoes.

In terms of if microshocks occur NG suggests that *“If microshock were to occur, which the Applicant does not think is the case, the Code of Practice provides a suite of measures which can be utilised to provide further mitigation, if required. Accordingly, the Applicant considers that the paddock can continue to be used safely for its existing purposes. “*

Looking at the Code which of the following below taken from the code would NG propose that we use ?

Reducing the electric field at its source.

Reducing the electric field by screening.

Replacing a conducting object with an insulating one.

Earthing.

Restricting access to land.

Protective equipment or clothing.

For us the only measure would to restricting access which would be impracticable once the line is operational, this needs to be beforehand.

NG Response in **REP7-481**

However, the span over the Stacey’s paddocks, TB 97 to 98 has sufficient clearance to ensure that the electric field is below 5 kV/m, as detailed in the Code of Practice, meaning that the provisions of the Code of Practice for the control of microshocks have in fact been met even though this is not a requirement because the land use is not one listed in the Code.

NG have not demonstrated that the line clearance across the paddock would lead to the field below 5 kV/m.

UKPN

NG Response in **REP7-481**

“The Applicant and UKPN will continue to engage with affected landowners as the design develops and detailed construction planning progresses. Where alternative

routing options are proposed by landowners, these will be reviewed and considered against technical, safety, environmental and deliverability requirements, together with the requirements of the authorised scheme. Previous discussions have acknowledged that alternative alignments outside the draft Order Limits may be capable of being pursued through separate agreement if all relevant parties agree and the necessary technical and project requirements can be satisfied.”

“The Applicant will continue to work collaboratively with UKPN and the Affected Person to understand site-specific constraints and to identify opportunities to reduce impacts on the farming business whilst ensuring that the diversion works remain safe, technically feasible and capable of being delivered.”

My Response

Since the meeting we held with UKPN we have had no further contact even though UKPN had indicated during the meeting that it would be up to NG to decide if the less invasive and less costly route for the underground cabling would be able to go ahead and they would seek the Authority to use this route.

To try to resolve this matter our land agent has been attempting to contact UKPN to make them aware this new route we have proposed is possible, unfortunately they have had no response.

RVAA

NG Response in **REP7-481**

“Fieldwork was undertaken in winter 2025”

My Response

NG needs to therefore edit the date to winter 2024 to be accurate as this is the time period they refer to.

NG Response in **REP7-481**

Views from the garden of Whiteheads Farm are mentioned on multiple occasions within Table A13.4.3 on page 81 and 82.

My Response

Views from the garden can only be experienced from the garden, views from the footpath through the farmstead will not give any indication of the view experienced from the back of the house and its patio.

NG Response in **REP7-481**

“The distance of ‘70 m’ stated in the Interested Party’s submission refers to the approximate distance that there would be from edge of this property’s garden to a pylon

in the worst-case scenario that it would be moved from the planned centre line of work (shown on shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109]), i.e. the most likely route to come forward, to a position at the closest point within the LoD. The 175m stated in the Interested Party's submission refers to the distance from the centre of the property to the closest proposed pylon. On the basis of the above explanations, we do not recognise the claimed inaccuracies of our assessment expressed in the Interested Party's submission."

My Response

In my submission REP6-212 my comment was *"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. "*

The inaccuracies were not the distances and I request that NG do not distort or inaccurately respond to my submission.

In terms of the multiple distances from the initial 175m to the now closest distance of less than 100m this has been misleading to an observer unless it had any context to it.

A figure of 175m which is the figure shown for the assessment could easily be claimed was used to support the assessment.

If the lower measurement of 70m due to the LoD and measurement from the curtilage which in fact is where the assessment needs to be considered from an observer may form a different opinion.

NG have also responded in their Document: 8.31 Response to Rule 17 Letter Received 14 July 2026 Final Issue A July 2026

Applicant's response

"The Applicant's response to the comments raised by the Interested Party in [REP6-212] regarding the accuracy of measurements within the RVAA is set out in document '8.4.16 Applicant's Comments on any Further Information or Submissions Received by Deadline 6' submitted at Deadline 7'. This sets out our justifications for measurements upon, for example, distances from the Interested Party's property to the nearby public right of way and distances from the property to proposed pylon positions (including the 'worst-case scenario' positions within the LoD). Consequently, we do not recognise the claimed inaccuracies of our assessment expressed in the Interested Party's submission. "

My comment.

As pointed out the inaccuracy is the views from the property, amongst numerous others, which NG cannot justify as they differ from one response to the next. Why do

their responses change? Are they trying to justify their opinion that the nearest pylon will not be overbearing and over dominant, which it clearly will?

Difference in measurements just confuses the reader.

Visualisation

My Question in REP6-212

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 visualisations they do not show the worst case. This is demonstrated by the details along the bottom of the image showing the nearest pylon is 175m and its height is as planned not the extra 6m it could be. NG again are completely misleading everyone and are hoping to persuade affected parties with lies

NG Response in **REP7-481**

The Applicant set out its position in respect of this issue at Deadline 6 on page 49 of document 8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 (Final Issue A) [REP6-118]. This stated that as there are theoretically multiple design scenarios associated with moving pylons towards properties such as Whiteheads Farm within the LoD, preparation of all of the visualisations shown in document 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196] took the reasonable and consistent approach of showing the closest pylons to the receptor moved perpendicularly from the centre line towards them. The Applicant has, however, assessed the worst-case scenario (whereby the closest pylon is placed at the closest allowable point within the LoD to this residential property) in Table A13.4.55 within document 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision D]. Consequently, no materially new points are raised in this submission.

My Response

The applicant has in the RVAA demonstrated that the worst case scenario is when the closet pylon could be 70m from the curtilage.

For these visualisations the applicant has only moved this pylon perpendicular and has not considered the lateral affect , also the extra 6m height has not been shown as well.

NG earlier Response REP6-114 to my submission REP5-301

“Whilst the pylon locations shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [REP4-109] are considered the most likely route to come forward, it is accepted that the locations of the pylons could theoretically move laterally, longitudinally and increase in height within the LoD in different ways to that shown within 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196]. It is not considered proportionate, however, to provide multiple illustrations to demonstrate the many possible permutations that could occur. Instead, it is considered that the visualisations shown in 8.4.12.1 Response to ISH2 Action Point 25 - LoD visualisations - Part 2 [REP5-196] present the reasonable ‘maximum visibility’ scenario.”

My Response

NG claimed that the closets pylon could theoretically move laterally, longitudinally and increase in height within the LoD.

This image is only a lateral deviation, please see the visualisation referred to below in the NG document.

REP5 207

Document: 8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations - ExQ1 LV1.10 - Part 3

PAGE 67



I questioned visualisations In my earlier submission REP4-405 NG responded in REP-5-194

“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”

This though is contrary to

Document: 8.26 Response to Rule 17 Letter received 5th June 2026

Assessment of Effects on Residential Visual Amenity (Step 2 and 3)

- 3.2.6 Table 3.1 provides a Step 2 evaluation of the baseline visual amenity for 70, 71 and High Hopes, Flordon Road and a Step 3 assessment of the effects on their residential visual amenity. The table also indicates whether or not the assessments should proceed to Step 4. All steps employ the same methodology as set out and used in the **RVAA [REP4-148]**.
- 3.2.7 The assessment should be read alongside –Figure 8.26 Response to Rule 17 Letter received 5 June 2026 - Residential Visual Amenity Assessment - 70, 71 and High Hopes, Flordon Road, in Appendix A, and visualisations Figure A13.4.2Aa (xxvi) to Figure A13.4.2Aa (xxviii), in Appendix B.
- 3.2.8 The visualisations in Appendix B include wirelines and 3D Digital Models to accord with those submitted within **8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations - ExQ1 LV1.10 [REP5-205] to [REP-5-208]**.
- 3.2.9 The visualisations are not verified views (as data from their locations has not been collected in person) and are seen as a supporting tool for illustrative purposes only, to add further understanding of development and vegetation surrounding each viewpoint.
- 3.2.10 Trees and hedgerows are presented in winter (i.e. broadleaf without leaves) and therefore show the worst-case scenario. Buildings are presented as white massing models, with building extents, height, roof pitch and shape determined by Lidar Digital Surface Models.

This visualisation is also referred to in **Document: 8.9.1.4 Residential Visual Impact Assessment Supporting Visualisations - ExQ1 LV1.10 - Part 1**

1. Introduction

- 1.1.1 In response to LV1.10 of **Examining Authority's Written Questions 1 [PD-014]**, the Applicant has produced a series of computer generated visualisations to supplement and provide further context to the wireline visualisations presented in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [Revision C]**.
- 1.1.2 The visualisations are not verified views (as data from their locations has not been collected in person) and are seen as a supporting tool for illustrative purposes only, to add further understanding of development and vegetation surrounding each viewpoint. In each case, the new visualisations have been presented on a following page to allow comparison with the originally submitted wireline visualisations (at DCO submission). Original wireline visualisations were presented from the centre point of each property (i.e. often the digital centre of the dwelling) within a bare earth setting. Given that the computer-generated visualisations now include building masses, the location of these viewpoints has been moved to a location at the nearest edge of the dwelling for that particular angle of view to avoid obstruction by any 3D modelled element including buildings and vegetation.
- 1.1.3 Trees and hedgerows were presented in winter (i.e. broadleaf without leaves) and therefore show the worst-case scenario. Buildings are presented as white massing models, with building extents, height, roof pitch and shape determined by Lidar Digital Surface Models.
- 1.1.4 The proposal pylons are based on a single 3D asset generated at the same coordinates as those set out within the Applicant's proposal. These are representative of distance, scale and degree of visibility, but are indicative and may differ in exact architectural form.
- 1.1.5 The visualisations are produced using the following datasets:
- National Tree Map (demonstrating any trees over 3 m) up to 200 m from selected properties, and indicating their measured height
 - Hedgerows digitised by the Project based on ESRI World Imagery Layer at an assumed height of 1.5 m, up to 200 m radius from selected properties.
 - Buildings modelled use footprints from Ordnance Survey MasterMap (OSMM) National Geographic Database building dataset up to 1 km radius from selected properties, and indicating their extents, height, roof pitch and shape.
 - Lidar Digital Surface Model.
- 1.1.6 Visualisations are presented in Appendix A.

This visualisation is therefore from the boundary edge, though simply looking at the image the boundary edge chosen is not the closest boundary corner to the edge of the pylon.

The other two visualisations referred to are shown below.

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Page 330

Images shown only show a perpendicular movement within the limits of deviation.

Noise

NG Response in REP7-481

“The Interested Party's submission relies largely on simplified distance calculations using the indicative reference tables in 6.14.A1 Environmental Statement Appendix 14.1 - Construction Noise and Vibration Data [Revision B]. Those tables are intended to provide generic noise levels over distance for individual activities and are not site-specific predictions. They do not take account of factors such as: • actual plant selection; • duration and phasing of activities; • screening from topography, buildings, hoarding or temporary barriers; • Best Practicable Means (BPM); • detailed construction methodologies; • the location of activities within the Order Limits; and • project-specific mitigation measures. Consequently, direct comparison of a receptor distance against a single table value does not represent the detailed construction noise assessment process that would be undertaken prior to construction. “

My Response

NG have made the claim of 64 dB for daytime and less than 55 dB without mitigation.

They also make the claim that a detailed noise assessment will be made prior to construction. How can NG claim these are exact figures if they haven't carried out a detailed noise assessment?

An inaccuracy of 1d B could lead to significant adverse effects.

Considering the closeness to this figure the noise should be monitored, looking at the code NG refers to there is the following statement *“Monitoring of noise at sites where noise is an issue should be regarded as essential. “*

NG Response in REP7-481

“With regard to start-up and close-down activities, the Applicant is not proposing that such activities can take place without control. Any works undertaken during these periods would remain subject to the construction noise management framework and the applicable noise threshold for the relevant time period. The Applicant notes that the construction assessment adopts the lower Category A thresholds from BS 5228-1 as a conservative basis for assessment.”

My Response

NG are happy for the start up to be at the threshold at the relevant time period, this would mean 45 dB.

This is less than the 50dB that some Councils are proposing, which is some 3 times more in power terms and unacceptable in a rural environment.

Working Hours

NG refers to the document Annex A Programme Narrative for Working Hours Justification of 8.5.11 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117].

"No Sunday Working "

1.5.3

"It is estimated that such constraints would result in a delay to energisation in the region of 6 to 12 months. The Applicant recognises that the estimated delay of approximately 6 to 12 months is expressed as a range rather than a precise figure."

My response

This 6 to 12 months is considerably more than earlier modelled by NG.

Looking at the nature of work carried out some appear to be noisy operations such as cable tensioning.

The noise thresholds are lower on a Sunday. There is a risk that these noisy operations will be carried out during these lower threshold periods. In fact this must be the plan as, otherwise, how can the delivery date be significantly improved?

NG may appear to be happy to carry on these operations even though the threshold has been breached.

As an affected party during the 130 days for construction of a pulling site for instance there will be the initial work such as tree clearance , haul road construction , its use and subsequent removal which will be outside these hours.

No working Sundays is essential. We must be allowed some respite from the works.

Farm Safety

NG Response in **REP7-481**

"The Applicant's position is that there is no indication that the respondent actually uses or intends to use a combine of the size indicated 'the largest new holland combine'. As such this creates a misleading, hypothetical and disingenuous basis for design. In practice large farm machinery operates safely under overhead lines throughout the UK without impediment. Clearances vary depending on landform and proximity to the pylon being greater the closer to the pylon, and in the case of combines as to whether the unloading auger (usually the highest point) is deployed. The Applicant remains of the

view that the response provided, and accompanying documentation establishes a basis for safe working that is appropriate for the circumstances encountered along the route.”

My Response

Our combine at present is around 1 metre lower than the largest combine and, depending on the accuracy of the proposed drop and ground conditions, it would be difficult to assess on the day whether there is a safe 4.30m of clearance.

It is, in fact, immaterial whether we have such a combine as along the route there will be farmers that have combines taller than ours. This must be what any design is based upon and the worst case scenario.

When we next update our combine it is likely to be to one of the largest combines so it is misleading, hypothetical and disingenuous for NG to say there is no evidence that we plan to use one.

Trees

NG Response in **REP7-481**

“The Applicant is unclear by the references to pylons and to the image provided as both of these appear to be in the vicinity of pylon TB98 rather than TB96 and TB97. Irrespective of this the Applicant has shown the trees are either ‘Unaffected’ or ‘Potentially Affected’ and has committed to reducing tree removal during detailed design, see GG14 of 7.2 Outline Code of Construction Practice [Revision G]. The Applicant confirms that the commitment for 3:1 tree replacement also applies to category C (low quality) trees. These are shown, without unique tree identification labels, on the arboricultural impacts “

My Response

A simple reference to NG’s own plans would show there are a single row of trees that are affected between TB97 and TB 98 so NG making the assessment that they cannot identify these trees is difficult to believe.

It does emphasize the difficulty that is and will be associated with the replacement policy of Category C trees as they are not identified.

If they are part of the replacement policy how are they identified?

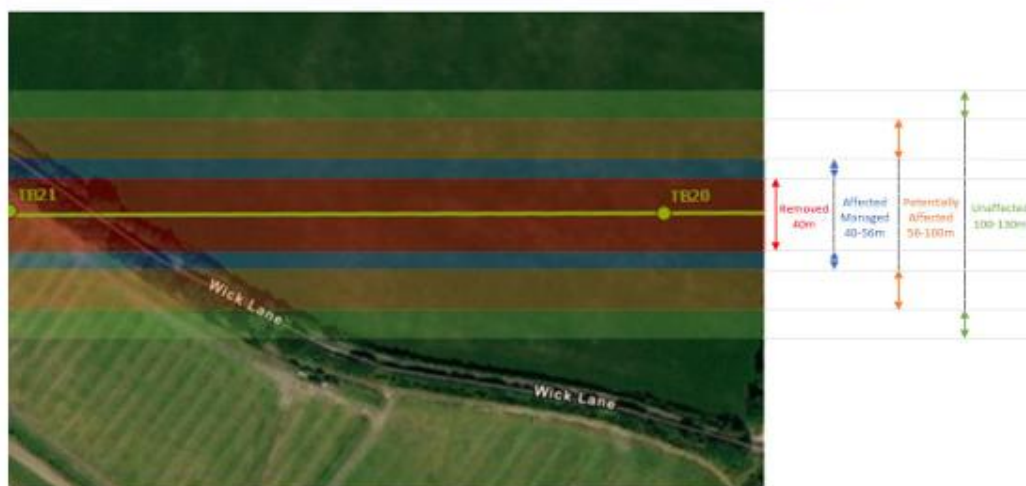
Are all the trees shown on the maps being replanted? REP7-056 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section E (Clean) (Final Issue C).

Vegetation Clearance for Overhead Lines

- 4.8.53 For the purposes of the ES (Volume 6 of the DCO application), a general approach has been assumed (unless otherwise stated) that where the Project interacts with woodland, trees and hedgerows, clearance would comprise the following approach for standard lattice pylons (refer to Image 4.9):

- Vegetation removed (to ground level or sufficient height to meet electrical clearances plus an allowance for growth)¹⁷: A 40 m wide swathe of vegetation removed to allow for the construction and operation (and maintenance) of the overhead line (to include all physical infringements to conductor, including conductor swing¹⁸ (45° blown-out conductor), i.e. 20 m either side of each overhead line centreline)
- Vegetation affected/managed: An additional up to 8 m of vegetation either side of the 40 m may then need be managed during construction and operation (and maintenance) to allow for electrical clearance from the conductor to be maintained (assumes a generalised allowance of 0.5 m growth per year over a five-year period)
- Vegetation potentially affected: A further up to 22 m of vegetation either side of the 8 m would be potentially affected, which includes allowances for design flexibility as per the proposed lateral LoD
- Vegetation unaffected: Vegetation beyond the 22 m would be unaffected.

Image 4.9 Vegetation clearance requirements for standard lattice pylons



3.4.4 The following assumptions have been made when considering impacts:

- **Trees** would be removed underneath overhead lines and cannot be re-planted under overhead lines. It is assumed that 20 m either side of the overhead centre line would be removed and **trees** within 40-56 m may be 'affected', to what extent is unknown. Based on a worst-case scenario calculation it has been assumed that all **trees** within the 56 m width would be lost.

Looking at the REP7-056 Document: 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section E - Clean Version

The plans clearly show the trees that are Removed, Affected managed, Potentially affected.

The trees removed are along the centre are the proposed distance from this line.

What are the plans if the centre is moved?

If the centre line is moved to one side will the trees that have been planned to be removed now potentially remain.

In practice will trees to be removed be assessed after the exact pylon position is established?

Comments on Other Documents

HOT's

Our understanding is that NG are issuing HOT's in the first week of August.

This will be after we have any opportunity to express any concerns with the planning inspector.

How can this be allowed ?

This version I understand will have many issues that have not been resolved between our land agent and NG.

This is understandable looking at the history of the negotiations and further illustrates that NG has not engaged. During the consultation period Fisher German were sent out in listening mode only.

NG did not respond directly with us nor our land agent to our numerous submissions.

We fully support the submission REP6-174 Affected Parties represented by Whirlledge & Nott, Brooks Leney, Clarke & Simpson and Durrants and REP7-581 Clarke and Simpson, Brooks Leney, Durrants, Whirlledge and Nott clients.

We are very concerned with the lack of willingness to agree with the land agents in the heads of terms.

NG feel that there is no need to negotiate and are not concerned with the proposed effects on the land owners and their businesses.

The plan to restrict growing crops over a metre high within 30 m from a pylon is just one example.

This restriction must be removed as it is completely illogical.

In my submission REP5-301 I questioned the disparity of the figure Eire Grid is offering affected landowners which is around six times more than NG are offering.

In our discussion with our land agent NG are informing them that the rates are agreed with NFU so no negotiation is considered.

This is not the case. [REDACTED] from NFU categorically states that NFU has only agreed the Wayleaves rates which is not applicable for this scheme and not the Capital Sums offered.

NG, in my opinion, feel that as they have powers of compulsory purchase they do not need to engage nor negotiate and are looking to obtain our land for the pylons and easements at a knock down price.

The whole process

We were not given any options or alternative routes, it was pre-determined before the consultation.

Our request to resite the pylon line for the benefit of our property and the horses were not given due consideration, we had no direct discussion with NG on this matter. FG came out in listening mode only.

The survey data was withheld from us and other landowners, in our case NG's own the walk over survey supported moving the line away from the horses.

Moving the line would have had many benefits in terms of reducing the adverse effects of noise, dust etc on our property.

NG are removing excess hedge and ditch to facilitate the haul road, this could be reduced by simply moving the haul road around 20m.

Soils, the scheme has never considered choosing the route to use poorer soils as soils were scoped out at the design stage.

NG make the claim that they are minimising land loss, but the land lost is not of poorer soils that would have been chosen if NG had used the ALC map.

Dust

Document: 7.2 Outline Code of Construction Practice Appendix D Outline Dust Management Plan - Clean Version

1.8.2 This should include regular dust soiling checks of surfaces such as street furniture and cars within 100 m of the site boundary.

The term site boundary is difficult to quantify, will it be the draft order limit?

If this occurs what are the provision for our privacy and security?

It could mean that the assessor will be walking around our garden and invading our private space.

Concerning the dust control measures the speed limits must be limited.

Conclusion

The fact that NG have failed to consult adequately from the outset now leaves us with no choice but to oppose the DCO and the scheme. Whilst we would remain upset at the scheme NG are now saying they are unable or unwilling to agree modest adjustments to the siting of pylons that would resolve a number of issues we had pointed out to them from the outset.

This is also the case with the associated UKPN works that due to the lack of consultation will likely have a greater impact on our property and business than would have done if UKPN/NG had liaised adequately.

We have been asking NG for the past four years to engage with us to resolve the issue of the siting of the pylons and the routing of the UKPN cables. As no one from NG deigned to engage with us until after the DCO application and the draft order limit had been

formalised, although they are now saying that they should have taken our views into account, it is too late.

We support and endorse both the submissions dated 4th August from: Clarke & Simpson, Brooks Leney, Durrants and Whirledge & Nott, submitted on behalf of Affected Parties and the latest submission from Pylons East Anglia to the Inspectorate.