

25 NSRs during potential night-time works.”

How can this be established with the degree of variation with the LoD of the pylon positions?

Page 23

“Soils and best and most versatile land.”

This has not demonstrated anything about BMV Land.

Page 26

Human Health and Wellbeing

“The Applicant recognises that uncertainty whilst the proposals are developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents, “

National Grids lack of engagement has only increased the anxiety and this needs this needs to have an increased weight in the planning balance.

Page 35

Impact on Public Rights of Way

“As a result, no PRowWs would be closed without a diversion in place, and no severance of the overall network is anticipated

This is not compatible with the earlier published document :

7.6 Outline Public Rights of Way Management Plan.

Final Issue A August 2025

On Page 11

Temporary Closure with No Diversion

4.1.5 “ This would be used in some instances where there may be no suitable or safe available diversion for PRowWs and hence temporary closures may be required. “

AS -045

Volume 6: Environmental Statement

Document: 6.8.A15 Environmental Statement

Appendix 8.15 Badger Report – Redacted

Final Issue A August 2025

Page 6

NG make the claim that only 3% of the land within the draft order has not been surveyed.

“ It was not possible to survey 3% of the land within the Order Limits.”

We have [REDACTED] which we have told Fisher German about but National Grid have not even acknowledged it.

[REDACTED], this is a higher frequency than they are finding.

REP1-004

Volume 4: Compulsory acquisition information

Document: 4.2 Funding Statement - Clean Version Final Issue B February 2026

Page 1

“The funding statement confirms that the estimated cost of the project is approximately £1,200 million (2025/26 price base) and the mechanisms National Grid has to secure the necessary funding.”

This is considerably less than was announced at the hearings.

REP1-026

5.9.9 Draft Statement of Common Ground - Braintree District Council –

Clean Version Final Issue B February 2026

3.6.10 Construction effects

Page 52.53

Braintree District Council’s Position

“Any temporary haul routes should be designed in such a way to avoid damage to agricultural land, especially any drainage measures which may have been implemented by the landowner. The Council’s experience with regard to the Bramford to Twinstead NSIP is that the haul routes appear to be excessive in number and have resulted in excessive hedgerow removal, which could potentially be avoided. In addition, Requirement 10 (reinstatement schemes) should be strengthened to ensure that temporary haul routes are required to be removed following completion of construction.”

PAGE 58

3.7.10 Construction effects

Braintree District Council’s Position

“Not only are the construction hours excessive, Ddco Requirement 7(5) would allow for start up and close down activities up to 1 hour either side of the core working hours, with no decibel (db) limit on noise. Finally, there are numerous operations which can be completed outside of the core working hours listed in Requirement 7(4). These construction hours, alongside the start-up and close down provision and those activities outside of constructions hours, are far in excess of what the Council would consider to be reasonable and allow no real respite for Noise Sensitive Receptors (NSRs). Moreover, the severity of the construction hours especially at

weekends has the potential to understate the significance of effect at Noise Sensitive Receptors (NSRs)”

Pages 63.64

Braintree District Council’s Position

“BDC provided the following comments in their relevant representations dated 27th November 2025: • The ES chapter appears to have based its assessment from the locations of the pylons as shown on the works plans. However, this does not appear to also take into account LOD, which as drafted in the Ddco (Article 5 (a)), allow for the deviation from the lines or situations shown on the works plans within the defined order limits. As such, in the example of the receptor on Old Mill Lane, the pylon could in theory be 50m away to the edge of the order limits. There are also other examples of this. As such, it is not apparent that the ES has considered the worst-case scenario for construction noise impacts so the level of effects could be higher than predicted.”

National Grid Position

“Pylons could not be constructed on the outer extremities of the LoD.”

There is potential for the works to be up to the edge of the draft order limits.

3.9.14 Residential Visual Amenity Assessment

Pages 86.87

Braintree District Council’s Position

“Of these, 2no. properties were identified as potentially experiencing effects that may breach residential visual amenity (E7 West Ford Farm Cottage and E8 [REDACTED]). In both instances, further assessment concluded that amenity would not be breached. However, the Council are concerned about the visual amenity of E7 and E8, especially taking into account Limits of Deviation (LOD), which as drafted, enable placement of pylons anywhere in the order limits (which in the case of E7 and E8 are adjacent to their residential boundaries). Indeed, the LOD as proposed allow lateral and/or longitudinal variations within the Order Limits, with further flexibility as to vertical limits (height above, and depth below, ground). Any re-positioning of the pylons from the positions shown could have a greater effect on visual receptors, with seemingly little safeguards to prevent or other mitigate any additional harm of/to those visual receptors.”

National Grid’s Position

“With regards to property E8 – [REDACTED] the worst-case scenario would be the movement of pylon TB98 (currently proposed along the ‘centreline of work’ approximately 126 m from the property’s garden and 158 m from its dwelling) to the closest point of the LoD from the dwelling (as shown on the Works Plans (2.3 Works Plans - Section E APP-021)). This would make the pylon, instead, approximately 75 m from the property’s garden and 100 m from its dwelling (but, importantly, not ‘adjacent’ to the residential boundary as is stated in Braintree Borough Council’s Relevant Representation). In this worst-case scenario the Project would be appear closer (so larger) in the views experienced from the property, but there would not be any additional impacts. Additionally, the evergreen hedgerows along the property’s north east facing boundary would still filter some views from the dwelling’s ground floor windows and the garden to the pylon. Therefore, the Project would: not block the only available view from the property,

not be overwhelming in views in all directions from the property, not be unpleasantly encroaching, and not be inescapably dominant in views from the property (as set out in the tests in paragraph 13.2.26 of the RVAA). Consequently, in both the proposed and in this worst-case scenario, the Project would not have such an overbearing and dominant impact on [REDACTED] that would give rise to the ‘residential visual amenity threshold’ being breached.”

My opinion

National grid had [REDACTED] house being 174m , then 164m and now 158m.

Elsewhere National Grid claims it 200m from the dwelling in their assessment when considering and rejecting the line being moved.

The filtering suggested by National Grid by the evergreen hedge will be very limited when you consider a pylon that could be nearly 60m high and the hedge is between 2m to 3m high.

It would be inescapably dominant in views from the property.

REP1-0149

Braintree District Council

Suggested locations for site inspections (accompanied or unaccompanied or access required), including justification for consideration by the ExA and specifying whether the locations require access to private land

4.4 Summary

4.4.1

“The Council is concerned that the development would have a significant impact on the Residual Visual Amenity of West Ford Farm Cottage (E7) and [REDACTED] (E8). Both properties lie in very close proximity to the proposed alignment, and the scheme is likely to appear “unpleasantly encroaching” and “inescapably dominant” when experienced from these dwellings—criteria identified within the RVAA methodology as indicative of a potential breach of visual amenity. The Limits of Deviation (LOD) would also permit pylons to be moved closer or constructed higher than currently illustrated, increasing uncertainty around the scale of impact.”

4.4.2

“Given the sensitivity of both receptors and the potential for significant adverse effects, the Council considers that an ASI would be beneficial to enable the ExA to fully understand the likely impacts. Should the ExA consider that a breach of visual amenity may occur, they would have the ability to require amendments to the pylon alignment or to restrict the LOD in this location.”

This reinforces our position that we require a site visit.

REP1-138

8.5.2 Applicant’s Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 (Final Issue)

Page 7

“How feedback from the Interested Parties, and particularly those associated with CA, has been considered on the Project.”

NG Response

“Given the size of the Project, and the several thousand responses received at each consultation, the Applicant noted that it had taken an approach of not responding directly to every individual response. However, feedback on individual requests was provided to instructed land agents and reported in various documents, all of which are publicly available- ensuring those that have specifically sought changes can see and understand how their requests have been engaged with.”

The feedback was not reported back directly to land agents , any feedback, if given had to be found in the numerous publications.

Page 13

“The Applicant explained that RIIO4 funding has already been provided from central government.”

This demonstrates that the Green Book must be used as it is Publicly funded.

Page 16

“What is the Applicant’s response to representations received who raise concerns about a lack of meaningful land engagement?”

NG Response

“The Applicant confirms that it has sought to engage with all persons with an interest in land affected by the Project, with a clear preference to secure land rights by voluntary agreement wherever possible, and that this approach has been consistently demonstrated through its actions to date. Engagement has included direct contact, offers to meet, and continued dialogue even where initial responses have not been received.”

National Grid uses the term “dialogue “ and elsewhere “negotiations “, this is far from the truth.

The lack of willingness to engage and the fact that National Grid have no commitment to negotiate seriously harm the delivery of the project.

A direct example of this experience of our land agent Whirledge and Nott. They have been meeting with Fisher German to discuss commitments that landowners are seeking such as crossing points.

The first meetings are now seven weeks ago and Whirledge and Nott have still not had a response via Fisher German from National Grid of any promises of any commitments.

National Grid are NOT wanting to negotiate.

Soils.

Lastly, it is interesting to note that a large proportion of land has been reclassified a lower grade by National Grid.

This is demonstrated in comparison made between TB55 and TB170 in The reports below.

APP-142

6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping (Final Issue A)

The area between TB55 and TB170 is predominantly Grade 3A.

App-143

6.6.F2 Environmental Statement Figure 6.2 - Provisional Agricultural Land Classification (ALC) Mapping (Final Issue A)

The area between TB55 and TB170 is predominantly Grade 2.

In practice it does not strengthen National Grids case of complying with EN. At the design stage they had a duty to use the ALC map to choose the lower Graded soils, but they admitted that Soil was scoped out.

Looking at the Agricultural Land Classification map Eastern Region (ALC008) the route chosen to comply with EN 1 must have been further to the East on the bottom half of the route.

[Agricultural Land Classification map Eastern Region - ALC008](#)

Kind regards

John Stacey