

John Stacey, [REDACTED]
Interested Party Reference Number: [REDACTED]

Surname	PINS ref	Third party comment	Applicant's Response	J Stacey Response
J Stacey	[REP1-394]	General comments on disruption during construction and impacts on health, also on consultation, alternatives and use if the green book for costings.	These points are addressed in 8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140].	National Grid agrees that "spend from public purse", if Government funded Green Book must apply.
		There has been a lack of engagement. The IP signed intrusive and non-intrusive survey licences with a promise that it would receive the raw data within 14 days of National Grid being in receipt of this data. The Applicant has continuously refused to give out this data until an EIR was served. We could have used the data to support our case.	There has been considerable engagement with the IP, who has attended multiple consultations events, both non-statutory and statutory, and engaged with the Applicant at each event. In addition to the consultation events interaction there have been site visits and face to face meetings with both the IP and their agent, including a further two meetings in 2026 (15 January 2026 and on 25 February 2026). In respect of the data request the Applicant confirms this was provided after an EIR request, which was dealt with promptly, the data being provided on 25 September 2025 well ahead of the Examination timetable being published.	There was no meeting on the 15 January, only the 25 th February. I understand some landowners who did meet up on the 15 th are still awaiting a reply from NG. The EIR response was not prompt, anything but. We made an EIR request on 21/5/2025. After continually chasing we were promised a reply the first week of September but had nothing until the end of the month. The reply should have been within 20 working days instead it was about three times longer; we made a complaint to the ICO. The point was that the survey data should have been received in 2024 and would have supported our consultation response. National Grid, by refusing the landowners surveys are demonstrating that they are not willing to engage.
		We have the line crossing our horse paddock and the line is within 160m of our house. We have requested at every opportunity, that this should be moved to the adjoining field. The walkover survey commissioned by the	The Applicant remains of the view that the alignment is appropriate. We also note that there is some flexibility in design arrangements that can be exploited to reduce / mitigate the area affected and duration. This may include some offsetting of	Our view is that the alignment is completely unsuitable. If pylons TB96, TB97 and TB98 were relocating westerly. The relocation of the horses could be avoided, the overwhelming effect

		<p>Applicant recommended that the line be moved away from the horse paddock and this would have supported our case. The reply, not directly to us but found in their application documents, was that it cannot be moved as it would be contrary to the Holford Rules.</p>	<p>the construction area relative to the pylon which will reduce the likelihood that works will be able to avoid breaching the landowners hedge line. Any refinement to the working arrangements for installation or siting of individual pylons would be considered through detailed design and informed by site specific discussions between the Contractor and the relevant landowner. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations.</p>	<p>on our property could be minimised, the considerable noise and the affects on our quality of life would be reduced. National Grid has admitted that they are not able to satisfy Holford rules and to then use this as their excuse not to relocate the pylons is not acceptable. Our long-term health and wellbeing are being harmed with the pylons and their line so close to our home, its affect is magnified as we live and work at the farm, so there will be no escape from the pylons. NG are now claiming that there is flexibility in design, this will likely to be minimal, surely this should have been looked at before the contractor is involved at the start of the design ?</p>
		<p>The Applicant claims that this application was compliant with EN1 as there are no other suitable sites of poorer agricultural quality that can accommodate the Project. How can this be the case as at the very beginning they had scoped out soils as stated in their 2022 document Corridor and Preliminary “Routeing and Siting Study Report April 2022”?</p>	<p>The approach to alternatives is set out in 6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]. At each stage in the options appraisal process, transparent methods were used to inform decision-making. This included technical inputs from engineers, planners and environmental consultants to inform the decisions and design. In relation to EN-1, 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] states that soils are scoped out on the basis that, with the topics which have been included, this would not have a significant effect</p>	<p>However National Grid look at it, they cannot claim “there are no other suitable sites of poorer agricultural quality that can accommodate the project “ The claim that the pylon footprint is minimal does not change the fact that this statement in inaccurate. Looking at the route at the desktop stage and looking at the ALC Map the route to have used poorer soils would have been more eastly in the Braintree and adjacent area. This is where poorer soils in the region are.</p>

			<p>on the determination of the preferred route. For the overhead line route, the footprint of pylons is limited and thus the effect on agricultural land is limited.</p> <p>However, 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] does list BMV land as a 'seek to minimise' constraint in relation to the substation. Following the assessment, however, this was not considered a differentiating factor given the presence of Grades 1, 2 and 3 across the substation siting zones. This is different to scoping this out and demonstrates it was a consideration (but one that did not enable any differentiation).</p>	
		<p>The Applicant claims under health and wellbeing, state that there's no significant residual effects to health and wellbeing during construction and operation of the project. The lack of engagement, the length of time for the project, the lack of consideration of alternatives, are causing great anxiety and stress even at the pre construction stage. How can the Applicant claim that there are no significant residual effects to health and wellbeing?</p>	<p>An assessment of how the Project could potentially affect the health and wellbeing of local residents is contained in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. This includes an assessment of the potential impacts of the Project on mental health and wellbeing during the construction phase. The assessment notes that this may result in heightened levels of stress and anxiety for local residents as a result of potential environmental impacts in their local area (for example, noise, dust, traffic and visual impacts). A wide variety of measures have been identified to mitigate these impacts (for example use of best practicable means to reduce noise and air quality impacts) and these</p>	<p>The effect of health and wellbeing at population level is of limited consideration to us, it's the affect on individuals like us not the general population. The overall effect on us will be extreme especially with the uncertainty and potential heightened effect of the large degree of LoD. Was this catered for in the assessment? Looking at National Grids own figures the increase in noise levels throughout the construction period will be excessive., especially when there is such low background noise levels which are generally around the 35dB to 45Db. For instance looking at the noise levels for</p>

			<p>are outlined in 7.2 Outline Code of Construction Practice (Revision B) and in 7.3 Outline Traffic Management Plan [APP-309]. With appropriate mitigation, it is not considered that there will be significant health and wellbeing impacts at a population level. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders.</p>	<p>pylon construction there is a noise level of 65Db at 107m and for 55Db at 336m. Even using the 10Db suggested to Braintree District Council that can be achieved with Mitigation there will be a likely noise level increase of over 10dDB. According to the information given by National Grid a difference of +10 dB or more between the rating level and the background sound level is likely to indicate a significant adverse effect. How can National Grid consider what mitigation would be when they have not yet decided what methodologies of construction there will be ?</p>
		<p>Additional points in the summary that were not made orally in the OFH: Funding. Where is the money coming from? The costs are six years out of date. Compensation. £180.1 million has been quoted, how has this been worked out?</p>	<p>The Applicant has submitted 4.2 Funding Statement (Rev B) [REP1-004] which provides details on how the project would be funded. The Applicant's financial governance, including the treatment of land acquisition and compensation, operates within established corporate, regulatory and audit frameworks.</p>	<p>National Grid has not attempted to clarify the figures that make up this seemingly exact figure. As a llandowner who will be seeking compensation we ourselves can only give a rough estimate. Once we know the level of disruption caused and harm to our property will we be able to give a better estimate. National Grid must show the figures that make up the compensation quoted and how it can accurate ?</p>
		<p>Additional points in the summary that were not made orally in the OFH: A</p>	<p>The approach to alternatives is set out in 6.3 Environmental</p>	<p>National Grid admit that Soils were scoped out.</p>

	<p>question on Compliance for EN1 on soils. the statement found in the Document: 5.7 Policy Compliance Document Compliance of meeting EN-1 5.11.34 <i>“The Project minimises impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for CNP Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project.”</i> This should be shown as the case in the document from 2022, Corridor and Preliminary Routeing and Siting Study Report April 2022: 3.2.29, Pages 43, 44 <i>“Topics such as air quality, soils and geology, and water were scoped out of the Options Appraisal process on the basis that at this phase of the Project with the constraints above already applied, that these topic areas would not have a significant effect on the determination of the preferred route for the connection or substation siting.”</i> As an affected farmer, I would like the Applicant to evidence at what stage were the poorer soils chosen for the route to be able to make this claim. Did the Applicant factor in the actual soil classification, in that grade 3a is a poorer soil to grade 2, even</p>	<p>Statement Chapter 3 – Alternatives [APP-127]. At each stage in the options appraisal process, transparent methods were used to inform decision-making. This included technical inputs from engineers, planners and environmental consultants to inform the decisions and design. In relation to EN-1, 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] states that soils are scoped out on the basis that, with the topics which have been included, this would not have a significant effect on the determination of the preferred route. For the overhead line route the footprint of pylons is limited and thus the effect on agricultural land is limited. However, 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] does list best and most versatile (BMV) land as a ‘seek to minimise’ constraint in relation to the substation. Following the assessment, however, this was not considered a differentiating factor given the presence of Grades 1, 2 and 3 across the substation siting zones. This is different to scoping this out and demonstrates it was a consideration (but one that did not enable any differentiation). At the routeing and siting stage, detailed Agricultural Land Classification (ALC) surveys were not available, and the assessment used the published Provisional mapping. The results from the detailed ALC surveys undertaken are presented</p>	<p>Simply looking at the ALC Map demonstrated that the route chosen was not on the poorer quality land. This lack of consideration confirms in that National Grid had scoped soils out, otherwise the route would have been different. This is a non-compliance of EN 1.</p>
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		though both are BMV land?	in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139].	
		<p>Additional points in the summary that were not made orally in the OFH: The Applicant claimed at the CA Hearing that “we do provide feedback to the land agents”. This is not our experience. We have made our requests at every consultation, face to face meetings. We would like to have a direct reply from the Applicant to our numerous requests for moving the line around TB98, TB97 and TB96. We nor our agent have had a clear, direct response to our request, instead we are expected to locate partial answers in the extensive applicant’s documents.</p>	<p>There have been multiple engagement meetings between the IP, the IP’s agent and the Applicant over several years, the most recent of which were on 15 January 2026 to discuss HoT with the IP’s land agent, and on 25 February 2026 with the IP and their land agent both in attendance. As noted above, the Applicant responded to this point in 5.1 Consultation Report [APP-066], which stated that moving TB96 (now TB98) north would add an angle pylon into the alignment which would be less consistent with the Holford Rules. The Applicant remains of the view that the alignment is appropriate. The Applicant also notes that there is some flexibility in design arrangements that can be exploited to reduce / mitigate the area affected and duration. This may include some offsetting of the construction area relative to the pylon which will reduce the likelihood that works will be able to avoid breaching the landowners hedge line. Any refinement to the working arrangements for installation or siting of individual pylons would be considered through detailed design and informed by site specific discussions between the Contractor and the relevant landowner. Records of engagement are maintained, and any aspirational commitments</p>	<p>As stated earlier , there was no meeting on the 15th January 2026. One of the National grids claims not to move the pylon further from our property was the claim that pylon TB96(now TB98) is in a section of line positioned to be equidistant from nearby properties. Its position, at the moment, is much closer to our property than to the neighbouring property Moving the line is feasible without moving it closer to the neighbouring property. National Grid have not wanted to have any flexibility in design. The only time they have shown a willingness to accommodate any request was a small movement of the pylon which was in the horse paddock to just outside the paddock. This slight amendment is in fact meaningless due to LoD, meaning that it can quite easily be resighted back to its original position.</p>

			are documented for detailed design purposes, subject to technical, environmental and constructability considerations.	
		Additional points in the summary that were not made orally in the OFH: Pages 4491/4492 Ref no 10-39.8 Summary of matters raised: Concern that the proximity of Pylon TB96 to the respondent's property means that no amount of screening and softening will reduce the impact to the landscape to an acceptable level (e.g. impact on property value, noise, traffic, quality). The Order Limits are only around 85m from our house, so due to the large potential variance of the position of the pylon, the edge of the pylon may be not much more. The Applicant claims its 175m in the RVAA assessments which is likely to be to the centre of the pylon and the centre of our property, so it's not 200m. There are no other existing buildings between TB96 (now TB98) and to afford screening and filtering views.	As stated in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234], the Applicant recognises that there will be a high magnitude of visual change to views from [REDACTED] as a result of the Project, which will include clear views of TB98. As such, a more detailed assessment has been carried out to understand if there is likely to be a breach of the Residential Visual Amenity Threshold (RVAT), in line with guidance outlined in Landscape Institute Technical Guidance Note (LI TGN) 2/19, however, no breach of the RVAT is expected at this property.	In the response to Braintree District Council National Grid admit that in the worst-case scenario there is the potential that the pylon is approximately 75m from the garden of our property and only 100m from our residence. How can they make the claim that there is no breach of the RVAT threshold. The pylon that could be nearly 60m high will be overbearing on our house that's only around 12m high.
		The speaker added detailed comments on the RVAA undertaken for their property and whether this assesses the worst case due to the assumptions made about pylon positions based on the LoD. This is not written in full due to the length of the comments.		National Grid recognises that there will be a high magnitude of visual change. Was this assumed carried out on the basis that the line and pylon potentially could be approximately 100m away from the property and the nearest pylon nearly 60 m tall.
		Additional points in the summary that were not made orally in the OFH:	The Applicant remains of the view that the alignment is appropriate.	Aspirational commitments would be to go offshore or the

	<p>Pages 4503/4504 Ref no 10-39.18 Summary of matters raised: Suggest that the Pylon TB96 and the haul road are relocated north, removing any oversail or encroachment to the paddocks. National Grid's response: "National Grid notes the respondent's feedback. In order to change the location of TB95 to TB99 to the proposed alignment from the respondent, we would have to increase the length of the overhead line and increase the number of angled pylons, which would be less consistent with the Holford Rules. We have therefore not proposed a change to the alignment in this location. We previously moved the location of pylon TB98 approximately 60 m to the west along the alignment to avoid the paddock. My response: TB98 was moved to the west, but the construction site is still within the paddock.</p>	<p>We also note that there is some flexibility in design arrangements that can be exploited to reduce / mitigate the area affected and duration. This may include some offsetting of the construction area relative to the pylon which will reduce the likelihood that works will be able to avoid breaching the landowners hedge line. Any refinement to the working arrangements for installation or siting of individual pylons would be considered through detailed design and informed by site specific discussions between the Contractor and the relevant landowner. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations.</p>	<p>very least HVDC undergrounding. Our requests to move the line further away across to the west which is our own land is feasible and not aspirational. National Grid are proposing a flexibility in design arrangements. This should have been proposed at an earlier stage . How would it work in offsetting of the construction area, surely the pylon will be constructed where it is intended to be, or is the plan to move the 50m plus pylon once built on its intended location?</p>
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Questions that National grid have failed to answer.

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

What does "A localised commitment during construction "mean?

In the report for RVAA "The closest pylon Tb 98 (53.84m AOD) would this be visible in direct views from the side elevation (north-west facing) and the garden , at a distance of approximately 164m " My question is would this measurement be the view from within the property ?

I also asked if my calculations from the garden edge of the nearest pylon could be no more than 60m and with a pylon height of 59m, National Grid have not confirmed this though they have given Braintree District Council their calculation.

John Stacey, [REDACTED]
Interested Party Reference Number: [REDACTED]

Due to the excessive LoD are the visualisations in the application a valid representation?

Further comments in reference to National Grids response to Braintree District Council.

REP2-023

Document: 8.4.1 Applicant's Comments on Relevant Representations- Clean Version

Looking at the comments made by National Grid to the BDC Comments I would like to make my own comments.

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Why are NG using misleading information for the capital cost of £895m as a comparison, do they not know the cost with the mitigation.

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Braintree District Council questioned the fact that there was not a single breach of RVAA and were concerned that the large level of LoD had not been taken into account.

For our property [REDACTED] National Grid Responded with the following:

National Grid make the claim that in the worst-case scenario the Project would appear closer in the views experienced from the property, but there would not be any additional impacts.

If this was true, which is very doubtful, why does National Grid make the following point: “ but, importantly, not adjacent to the residential boundary as is stated in Braintree Borough Council Relevant Representation”.

Surely, how can it be important if they claim that if it’s closer there is no additional impact.

In my opinion the closer it is the bigger the impact.

National Grid make the claim that it would not be unpleasantly encroaching and not be inescapably dominant in views from the property.

The nearest pylon would be at a nearly 60m high 20m wide pylon with an open countryside setting as the backdrop 75m away from a 13m high residential property, how can this be true?

National Grid then makes the statement that the need for the project outweighs the adverse landscape and visual effects.

Why if there is this need is there not some degree of protection that can be given to us in moving the pylon line away from our property?

Further comments in reference to National Grids response to Braintree District Council, I have shown in table form below.

Topic	Comment	NG's response	JS Comment
Ecology and Biodiversity	6.4 Some potential impacts on protected species are not yet fully measured and would be required to do so post consent. However, impacts on bats need to be assessed before a lawful decision is reached. Further information is required to give reasonable confidence in the assessment of the impact on bats and whether the proposed mitigation would be appropriate. While climbing will not be possible for every tree, further bat surveys should be possible to allow for a data-based estimation of the percentage of the PRF-M (Preliminary Roost Features - potential) trees that evidently (or very likely) support a significant level of bat roosting and will be lost to this NSIP project	The bat roost survey scope was agreed with Natural England in advance of survey being undertaken. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] includes a reasonable worst-case assessment of impacts on potential roost features. Barbastelle bats are the rarer bats in the area that could be affected by the Project and so targeted surveys have been undertaken to confirm whether these bats are roosting in trees affected by the Project including aerial surveys, emergence, back-tracking and radio tracking. Where roosts have been confirmed for barbastelle bats the route was amended to avoid these roosts. Due to the transient nature of bat tree roosts, pre-construction surveys would be undertaken of all trees due to be lost with suitability to be used by roosting bats, to confirm the presence/absence of roosting bats, prior to felling/pruning. Where the presence of a roost is confirmed, mitigation measures, as agreed with Natural England, will be employed under licence to ensure no impact on the favourable conservation of bats.	National Grid makes the claim that "Where roosts have been confirmed for barbastelle bats the route was amended to avoid these roosts. Where has this occurred, we had a tree survey that identified have a Bat Roosting Feature Tree but have had no subsequent survey, what was analysis made to quantify that a targeted survey was needed? The walkover survey on our property gave a recommendation for further survey recommended due to the potential roosting features. This has not taken place.
Noise and vibration	9.1. The construction impacts associated with this project have the potential to have significant noise and vibration impacts on residents and businesses in the Braintree District and beyond.	The Applicant does not agree with this statement. The assessment provided in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] indicates that no significant effects from noise or vibration, during either the construction or operational phases, are expected in Braintree District. Additionally, only one significant effect from noise, in relation to construction traffic noise, is expected for the Project as a whole.	The document 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] referred to, appears to be produced by National Grid. Is there not a conflict of interest if reports are not produced by a third party? Section 14.7.9 of their APP-256 Noise and Vibration states they found "144 identified potential significant adverse effects during daytime periods" relating

	<p>9.2. This is in part owing to the excessive construction hours put forward by the Applicant which are 07.00 and 19.00 Monday to Friday and 07.00 and 17.00 on Saturdays, Sundays, bank holidays and other public holidays (as set out in Requirement 7(1) of the draft Development Consent Order (dDCO).</p>	<p>The Applicant does not agree with this statement. Although working periods outside of the ‘daytime’ periods identified in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise37, as detailed in Section 4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] are more sensitive to noise during the ‘daytime’ period (hence their lower threshold for potential significant effects), works during these periods would not directly lead to a significant adverse effect. Consideration of the sensitivity of the working period would be required as part of the application of Best Practicable Means as per commitment NV01 within 7.2 Outline Code of Construction Practice [APP-300].</p>	<p>to noise, of which “ 21 relate to the construction of new pylons” and “ 18 relate to the construction of temporary construction compounds”. The Noise report suggest best practice measures, which will be employed by the construction contractors, will ensure there are no significant effects from noise. However, how can this be assured when there is currently no specific plan provided? How will NG ensure contractors are carrying out all BPMs to ensure no significant effects from noise or vibration occur?</p> <p>Commitment VN01 states that monitoring of noise and vibration are “To be confirmed by the Main Works Contractor(s) if Project is consented”. We have not been provided with estimations or assessments from NG to justify their claims that their excessive working periods, which are outside of the ‘daytime’ periods identified in BS 5228-1:2009+A1:2014 will not “directly lead to a significant adverse effect”. To make this claim, we need detailed predictions and assessments to be made to establish whether the predicted level of construction activity that will be taking place, at the distance the construction pathway is from our property, will not cause adverse noise or vibration effects.</p>
	<p>9.3. 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</p>	<p>The proposed construction core working hours, activities which can take place outside of the core working hours and the provision for start up and close down activities are available in full in Schedule 3 of 3.1 Draft Development Consent Order [APP-056] (draft DCO). The working hours are secured through Requirement 7 of Schedule 3 of 3.1 draft DCO [APP-056]. 3.1 draft DCO [APP-056] permits a limited</p>	<p>Schedule 3 of 3.1 Draft Development Consent Order [APP-056] which has been superseded by REP2-004 on page 102 states that it includes start up and close down activities include refuelling of plant, and general site maintenance. It is assumed plant could be used during these activities. Which could lead to LOAEL and SOAEL of</p>

	<p>completed outside of the core working hours listed in Requirement 7(4).</p> <p>9.4. 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).</p>	<p>range of activities to take place outside the core working hours where this is necessary to ensure public safety, engineering integrity, network reliability, or compliance with third-party requirements, and to minimise overall disruption. The activities identified are not routine construction works but are those that are time-critical, continuous once commenced, or externally constrained, such that restricting them to core hours would increase risk or prolong impacts.</p> <p>Trenchless crossings, underground cable jointing, oil processing of transformers, and certain commissioning activities may need to proceed without interruption to avoid safety, environmental, or asset integrity risks. Works affecting highways, railways and watercourses, including conductor installation and the delivery of abnormal indivisible loads, are often governed by requirements of highway authorities, asset owners or the police, and are therefore routinely scheduled at nights or weekends to maintain safety and reduce disruption. Provision is also made for the continuation of works to a safe stopping point, the completion of works delayed by severe weather, emergency activities, security monitoring, and necessary survey works.</p> <p>Mechanical and electrical installation works undertaken within completed and enclosed buildings are expected to result in minimal external effects and can proceed outside core hours without significant effects on nearby receptors. The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters that include the core working hours for the construction phase of the Project.</p> <p>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] assessed the impact to sensitive receptors from noise and vibration during the construction</p>	<p>40dB and 45dB respectively for nighttime being exceeded.</p> <p>The list of works that can be carried on outside the core hours include the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities, this would mean anything can be carried out include pylon construction, which is one of the noisiest operations, which is not acceptable.</p> <p>What exclusions will there be?</p> <p>NG's solution to potential significant noise effects is that they refer to the mitigation and controls set out in 7.2 Outline Code of Construction Practice [APP-300]. However, this is just a generic paragraph about how the contractor must follow best practices. There are no project specific explanations.</p> <p>We realise, assuming a contractor is not involved yet, specific mitigations will be hard to identify, but we want NG to provide more detailed noise and vibration mitigation information for us to be certain their promises will be fulfilled.</p>
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		<p>phase, and based the assessment on the core working hours proposed, which would include start up and close down activities taking place up to one hour either side of the core hours, and activities which can take place outside the core working hours. The assessment concluded that with the embedded mitigation and controls set out in 7.2 Outline Code of Construction Practice [APP-300], significant effects from during the construction phase are not anticipated. The measures set out therein will be secured via Requirement 4(a) (Construction Management Plans) of 3.1 Draft Development Consent Order [APP-056] within the final Code of Construction Practice. The Applicant therefore considers the provision for start up and close down activities and activities that can commence outside of core working hours to be proportionate, justified, and consistent with established practice for Nationally Significant Infrastructure Projects, noting that all such activities remain subject to the application of best practicable means and appropriate mitigation to manage noise and other environmental effects as set out in 7.2 Outline Code of Construction Practice [APP-300].</p>	
	<p>9.5. For example, the NSR located off Old Mill Lane (Threadkells), to the southeast of Coggeshall Hamlet has been identified as a 'Medium' magnitude of impact in terms of construction noise before mitigation. The receptor appears to be approximately 140m from a proposed pylon location (TB78). From Table A14.1.2, Pylon construction noise would be between 60dB – 66dB at the NSR. This could potentially be greater</p>	<p>This interpretation is partially correct. However, the assessment of weekend construction works within 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] of the ES includes two key assumptions which mean this interpretation is not applicable in practice. 1. Mitigation is assumed for weekend works Weekend and bank holiday periods are more sensitive than weekdays, reflected in the lower threshold of 55 dB LAeq,T (compared to 65 dB for weekdays). The weekday assessment assumes no mitigation as a worst case to identify 'hot-spots' where mitigation is required to avoid significant adverse effects.</p>	<p>How do they plan to achieve the 10dB attenuation which they have factored into their assessment? The council cited a NSR site 140m from a pylon site, this is without considering limit of deviation. Taking this LoD into account, on our site, the pylon could be just 75m from our property and 100m from our residence. National Grid is proposing to have temporal restrictions and limits of the duration of works where thresholds could still be exceeded. What does this mean?</p>

	<p>than +5 dB above the ABC category threshold during the weekend and therefore a 'Large' magnitude of impact. This argument could be applied to other NSRs across the route.</p>	<p>Applying this assumption to weekends would overstate impacts. Instead, the weekend assessment assumes a reasonable 10 dB attenuation from mitigation, meaning the same 'hot-spot' locations identified for weekdays without mitigation are the same as those for weekends with indicative mitigation (because the difference between the thresholds is also 10 dB).</p> <p>2.Temporal restrictions, considered as part of Best Practicable Means, are applied where thresholds could still be exceeded with mitigation. This ensures that significant adverse effects do not occur during weekend periods. Implementing mitigation would ensure that significant adverse effects would not occur in this situation, or others like it, as follows:</p> <ul style="list-style-type: none"> - The Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within 7.2 Outline Code of Construction Practice [APP-300]. - Based on the outcome of these assessments, specific mitigation measures would be identified and implemented. These measures would be documented in the Noise and Vibration Management Plan (NVMP) which will be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306] submitted as part of the Development Consent Order (DCO) application. - Should the resultant construction noise levels 	<p>What is the maximum length of the duration of works? If they are correct in their assumptions that there will be no significant effects from noise and vibration, this should not be necessary or are they not confident in their assumptions?</p>
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		<p>exceed the noise level threshold for potential significant effects during any proposed working period (be it 'normal' daytime periods or otherwise), with the inclusion of all practicable mitigation measures, temporal restrictions would be required to either avoid works during that period at that location, or if works during this period cannot be avoided, limit the duration of the works such that the effect is not significant. Such situations may be managed through applications for prior consent under Section 61 of the Control of Pollution Act 1974, though consultation between the Main Works Contractor(s) and the local authority.</p>	
	<p>9.6. In addition, 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</p>	<p>The main construction noise and vibration assessment considers the proposed locations of the pylon working areas, as shown on 6.4.F1 Environmental Statement Figure 4.1: Proposed Project Design [APP-133]. However, the Limits of Deviation (LoD) for overhead lines (and associated pylons) is considered in Section 9 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. It is stated and agreed that movement within the LoD would lead to changes in construction noise and vibration levels (increasing if movement is towards noise sensitive receptors (NSRs), and reducing if further away), without mitigation. However, the mitigation measures would vary accordingly to ensure that significant effects are avoided and adverse effects minimised in line with policy (EN1, Noise Policy Statement for England, the NPPF and Planning Practice Guidance for Noise). It should also be considered that the LoD includes</p>	<p>“The LoD has been reviewed and there are no locations where movement towards the edge of the LoD, towards NSRs, would lead to any likely significant adverse effects with the implementation of standard mitigation measures.” This cannot be the case because the edge of our property is 75m from the proposed project and looking at table A14.1.3 from APP-257 6.14.A1 ,it clearly shows that for pylon construction at 107m there will be a 65dB noise level, and the edge of our property will be within this distance so the noise level will exceed this. NG have not used the 10dB mitigation for weekdays as they claim it is not needed but this suggests it will be needed. And for weekends that will be over the 55db level even with 10db attenuation. Also even with the attenuation there is likely to be an increase of over 10Db which is</p>

	<p>impacts so the level of effects could be higher than predicted.</p>	<p>the conductors and the associated conducted swing, as shown in 2.6.2 Design and Layout Plans – Overhead Lines [APP-042]. As such, in practice, pylons could not be constructed on the outer extremities of the LoD. There are additional constraints, such as roads and buildings, that fall within the LoD due to the conductor span, but where pylons could not be built, as well as pylon location constraints at ‘bends’ in the route that then inform the locations of subsequent pylons. As such, pylon locations are considerably more constrained in practice than is indicated by the LoD. The LoD has been reviewed and there are no locations where movement towards the edge of the LoD, towards NSRs, would lead to any likely significant adverse effects with the implementation of standard mitigation measures. Furthermore, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within 7.2 Outline Code of Construction Practice [APP-300] for each specific pylon location, based on its proposed location within the LoD following detailed design processes. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented for each pylon such that significant adverse effects are avoided. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306] submitted as part of the Development Consent Order (DCO) application.</p>	<p>considered a significant to have an adverse effect.</p>
	<p>9.7. The Council therefore consider further assessment is required to understand the true construction</p>	<p>The Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per</p>	<p>Why has this assessment not already been carried out which will aid the specific methodologies to be used?</p>

	<p>impacts experienced by NSR's. This is pertinent because there may be scenarios where construction activities need to be limited at specific pylon locations. An example of this can be found within the Bramford to Twinstead Development Consent Order, Requirement 7(5) (page 65) (PINS Reference EN020002). Buffer zones should be considered around pylons near sensitive NSR's.</p>	<p>commitment NV05 within 7.2 Outline Code of Construction Practice [APP-300]. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306] submitted as part of the Development Consent Order (DCO) application. These measures may include such restrictions at SOME locations, if they would avoid significant adverse effects. This same principle has been proposed on other recent National Grid projects, including Bramford to Twinstead and Sea Link.</p>	<p>If these methodologies have not been established yet how can National Grid make their claims that there will be no significant effects from noise or vibration. Equally, the level of mitigation that can be achieved cannot be quantified.</p>
	<p>9.8. In addition, the Council consider that at the very worst case, the Norwich to Tilbury construction hours should follow that of Bramford to Twinstead, which are less generous at: 07.00 and 19.00 Monday to Friday and between 08.00 and 17.00 on Saturdays, Sundays and Bank Holiday (one hour later start at the weekend). It should be noted that the Council objected to these working hours at the time of the Bramford to Twinstead NSIP examination.</p>	<p>The proposed core construction working hours for the Norwich to Tilbury Project have been developed to provide necessary flexibility to deliver a complex, largely linear, nationally significant electricity transmission scheme. This flexibility is essential to:</p> <ul style="list-style-type: none"> • Maintain programme resilience • Respond to weather disruption and access constraints • Coordinate with system outages and asset owners • Avoid prolonging the overall construction period. <p>The Applicant acknowledges the Council's reference to the Bramford to Twinstead project and notes that the Secretary of State accepted construction working hours of 07:00–19:00 on weekdays and 08:00–17:00 at weekends and Bank Holidays for that scheme, despite objections raised during examination. However, it is important to recognise that Bramford to Twinstead differs materially from Norwich to Tilbury in terms of scale, length, construction sequencing and</p>	<p>In terms of flexibility, surely the bigger the project the greater the degree of flexibility that can be achieved? This is opposite to National Grids claim.</p>

		<p>interface constraints. Norwich to Tilbury is significantly longer in extent and involves a greater number of workfronts, which increases the need for flexibility in programming and shift patterns. NPS EN-1 (2024) provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Paragraph 4.11.4 of the EN-1 also confirms that transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure. As set out within 5.6 Planning Statement [APP-085], the Project is CNP Infrastructure. The Applicant's position remains that the proposed construction working hours are appropriate and necessary for the delivery of this CNP Project and they are supported by environmental assessment and secured mitigation.</p>	
	<p>9.9. Furthermore, the Council consider that a noise limit should apply to the start up and close down hours at the nearest NSR's – this should be a maximum of 50db and precedent for this is again found in the Bramford to Twinstead DCO Requirement 7(4) (page 65).</p>	<p>There are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and as detailed in Section 4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256].</p>	<p>National Grid are implying that they will be noise limits when, in fact, they will not abide by any. The start up and close down will be during the night time when the threshold is the lowest with the background noise also the lowest. What is the expected noise levels during this period?</p>
<p>Agriculture and Soils</p>	<p>12.4. There are no details provided of how the ALC mapping has been used in the micro-siting of permanent infrastructure or routing of the transmission network. Comment should be made on whether ALC</p>	<p>Detailed Agricultural Land Classification (ALC) mapping shown on 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139], was not available during the route optioneering stage. However, during route optioneering, the impacts on agricultural land (including on agricultural land-</p>	<p>How can this be the case when NG stated that they had scoped this out during the options appraisal process?</p> <p>Secondly, the document APP-127 refers to alternatives and has no bearing on the response given to the council request about consideration of ALC grade soils. Assessing the soils</p>

John Stacey, [REDACTED]

Interested Party Reference Number: [REDACTED]

	grade has been considered	take and on agricultural activities / operations, as far as was understood based on the data available at the time) were a consideration alongside all other constraints in the route selection process as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127].	once the route is determined is not the method needed to accurately choose the poorest quality soils for the route.
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