

John Stacey

Whiteheads Farm, Cressing Road, Witham, Essex, CM8 1RL

Interested party: [REDACTED]

Below is the transcript of my speech from during the hearing:

Thank you for hearing me today.

I'm here to endeavour to protect our family's well-being and quality of life in the future and protect our farming business.

We live near Witham, and we'll be hosting four pylons that run right through the middle of our farm. NG have calculated that the nearest pylon could be 70m from our garden and 90m from our house.

The line will cross over our horse paddock, there will be a construction site on the fence line, which will mean they will need permanently relocating along with the menage, stables and paddocks.

We have attended numerous meetings with Fisher German either on farm one online and one at Faulkbourne all of limited value.

We have attended drop in centre's events, as well as several webinars to try to get a more detailed understanding of the scheme.

At every opportunity, each site visit and consultation, representation. We have asked to move the line and the closest pylon away from our house and our horses.

National grid have never directly responded to our requests.

We had to find the answers in the new documents with the application.

National grid have made claims that the response was sent to our land agents, but this was not the case. National Grid claim there had been dialog, anything but.

Our main issue is our house for Visual Residential Amenity Assessment, along with the noise and dust, the close proximity of Pylon TB 98 is of major concern.

Braintree District Council have independently highlighted major concerns for our property.

National Grid dismissed both of our concerns, saying that the VRAA, which is the Visual Residential Amenity Assessment, is not breached and that the project is not considered to be unpleasantly encroaching or inescapable, dominant overall in the views from the residents.

Bear in mind it's only 90m away or potentially could be.

Our horses will need permanently moving at great expense with resighting of the Paddock, Stables and menage , as stated earlier.

National grid are aware that this will be a huge problem for us, but refuse to engage with us until now.

We have a meeting now, next month on May 12th. But we are waiting to hear their viewpoints, so we may still have that same position. If TB 98, 97 and 96 could be moved, it would allow TB 96 to be situated away from the wettest field, which is the most inaccessible area of our farm, which would surely be better for National Grid ?

Resighting would aid construction and maintenance as for about five months of a year, TB 96 would not be accessible due to the wet conditions experienced there.

Another issue is a plan to underground the existing UK power network overhead line.

We were told that this would run along the existing overhead line around the edge of the fields, but on June 25th 2025 we were surprised to see fresh maps which had a coloured line through our farmyard right in front of our grain store and the farm track and adjoining existing overhead line.

We found out that during a requested zoom meeting with Fisher German that this was the overhead line undergrounding.

At the subsequent meeting with Fisher German, they knew nothing of this because they didn't have this smart map, unlike the online event earlier.

We're now going to have our first meeting with UK Power Networks sometime in the distant future.

This will be a major problem, this UK power line being repositioned in front of our grain store and the construction element as it's right in front of a grain store, and it's right across our concrete farmyard and driveway, which would completely split our farm in half for an extended length of time, or for an indefinite length of time, and for a period we don't even know when it's going to happen.

Going forward, we've had initial accommodation works , meeting with Fischer German two months ago, and we are only now having the meeting hopefully on the 12th of May, but this is several years too late. This should have been done at the onset.

We needed information and discussion with dialogue on this project from the start.

For instance, the eventual outcome with crossing points will make a significant difference in our ability to farm the area being cut off by the haul roads.

Another concern is that farm security.

At this time, the farm is only accessible through an electric gate. The whole road and compound will open the farmyard up.

Looking at the heads of terms, there are issues which have been highlighted earlier. They're expecting us to sign, to allow them to ask for, not to object to any planning application on our land.

We also have to accept dewatering.

The design hasn't been stated yet and also the affected utilities, which is to my surprise, they are expected to pay for their own works because they've been asked to move them by National Grid and we will have to seek compensation, I understand from them.

And utilities are renowned for being bad payers of compensation.

Thank you.

Following on from the from my representation,

NG responded to a couple of our suggestions regarding moving the pylon route local to our property.

They showed that they had looked at two of our proposals of alternative routes:

We are not sure which routes they looked at as we had suggested several.

One of our proposals had been suggested a route that went across the edge of our neighbouring reservoir to the south of the farm. This would allow them to use the existing bell mouth, which is available and appropriate for use. There is space and some groundworks already in place there.

Additionally, to avoid the need for the horses to be moved, we suggested moving TB96, TB97 and TB98, enabling TB98 to be located outside of the horse paddocks. Pylon TB99 does not need to be moved. We also note that our neighbouring landowner suggested in their earlier representation that pylon TB94 should be moved to the west. This would support our proposed movement of TB96 to TB98, as the whole section could then be moved west.

Their response to this suggestion was that it would break the Holford Rules as it would require another angled pylon. However, the Holford Rules are already not being adhered to elsewhere on the project. During the hearing, NG mentioned that they had moved TB98 from within the horse paddock to just outside it. This highlights NG's lack of dialogue, as the construction site for this pylon is still within the paddock and the noise from the construction will be intolerable for the horses. If NG had come and met with us

to discuss their changes, they would have seen that the current proposal offers little to no improvement.

NG also responded regarding the UKPN works:

Transcript from UKPN's speaker during the hearing:

“Um, my understanding is the reason that is that UK drivers going through the farmyard is the existing poles that we need to cross. And as such, underground and off of the property and the garden, the existing um UK underground cable connection point with the service into the property and another pole line to the south of the property is to the south of the of the house. Um, in order to avoid routing the cable, the new cable through the garden or through the garden, or close to the property, it was, I believe, understood the most suitable option was to follow the track and connecting to that existing cable connection joint to the south of the property.”

We now have met with UKPN and made them aware that the required connection point is not to the south of our house, but at the rear of our garden on the north-west side. Therefore, there is no need for a new cable to be laid through our garden or yard. If NG had engaged with us earlier, submission errors such as this could have been avoided.

When we met with UKPN, it was also discussed that a separate easement with UKPN could potentially be agreed outside of the draft order limits, provided both parties agreed and it met NG's requirements.

Haul road speed limits

During the site-specific hearing, I raised the question of haul road speed limits.

Looking through their documentation, I found the following commitment:

Document: 7.2 Outline Code of Construction Practice – Clean Version

“Impose and signpost a maximum speed limit on haul roads and work areas.”

NG have used a speed limit of 20mph to assess the noise impacts. They also committed in REP3-025, Document 7.2 Outline Code of Construction Practice – Clean Version, Final Issue C, to:

“Impose and signpost a maximum speed limit on haul roads and work areas.”

Please can the applicant confirm what the speed limit on the haul road will be, and how it will be monitored and enforced?

In red are questions that NG have not answered, or where I would like a more direct answer. Below each question are details supporting my concerns.

Payment for pylons

NG are offering a one-off payment of £8,000 on arable land and £6,000 on grassland for the compulsory acquisition of land for each pylon.

How has NG assessed that this is a sufficient payment, and has inflation been taken into account?

Soils

When designing the route to comply with EN-1, the requirement is to choose poorer quality soils where possible. Looking at the ALC map, meeting that requirement would appear to require a route through Essex further east than the current route.

My earlier representation in:

APP-086

Document: 5.7 Policy Compliance Document – Compliance with EN-1 5.11.34

Page 184 states:

“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.”

This should be evidenced in the 2022 document: *Corridor and Preliminary Routeing and Siting Study Report*, April 2022, section 3.2.29, pages 43–44:

“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, these topic areas would not have a significant effect on the determination of the preferred route for the connection or substation siting.”

As an affected farmer, I would like NG to evidence at what stage poorer quality soils were considered in the route selection process in order to make this claim. Did NG factor in the actual soil classifications, for example that Grade 3a is poorer quality soil than Grade 2, even though both are classed as BMV land?

Document: 8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings, Page 79.

NG’s only direct comment on this issue was in APP356:

“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.”

The quote above is not directly from their referenced document, as the final sentence has been added by NG. This suggests that NG’s position is that soil quality is not important.

NG did not consider soils to be important and scoped them out. **How do they know that? Looking at the ALC map, as I stated previously in REP2-086:**

“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.”

Please refer to the ALC map NG should have used:

<https://publications.naturalengland.org.uk/publication/127056?category=5954148537204736>

Noise

NG did not agree with Braintree District Council’s claim that:

“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.”

Document: 6.14.F2 Environmental Statement Figure 14.2 – Construction Noise Assessment Outputs.

The map within this document shows the construction noise assessment outputs assessed by NG. For Whiteheads Farm, the magnitude of impact is assessed as low.

We agree with Braintree District Council , it is difficult to believe when considering the existing baseline at our property, especially as NG assessed the magnitude of impact as low without mitigation.

Looking at EN-1, pages 141–142, this should include:

- a prediction of how the noise environment will change with the proposed development
- impacts during the construction period
- impacts during the operating life of the infrastructure
- impacts at different times of day, evening and night, and at different times of year
- an assessment of the effect on noise-sensitive receptors, including health and wellbeing where appropriate

- measures to mitigate noise impacts using best available techniques

As well as the EN-1 requirement NG has highlighted the timescale required for an increase in noise for the impact to be significant.

APP-256

6.14 Environmental Statement Chapter 14 – Noise and Vibration (Final Issue A)

Significance for Residential NSRs

- 14.4.33 Significance of effects at residential NSRs is directly proportionate to magnitude of impact.
- 14.4.34 The significance of construction noise and vibration is determined based on magnitude of impact and the duration of exceedance. Significant effects are deemed to occur where there is at least a medium magnitude impact for a period of at least ten days in any 15 consecutive days or 40 days in any consecutive six months.
- 14.4.35 The significance of construction traffic noise effects has also been determined based on the magnitude of the change in noise level and the duration of exceedance. A magnitude of change of at least 3 dB (medium magnitude) (or 1 dB (small magnitude) in a NIA) for a period of ten days in any 15 consecutive days, or 40 days in any consecutive six months is considered to be significant.

1. NG claim there will be no significant impact in response to BDC. Looking at the impact on our property, and taking the LoD into account, do NG still maintain that claim?
2. A noise assessment is based on magnitude of change and duration of exceedance. Baseline noise levels at our property should therefore be the starting point of the assessment. What baseline has NG assessed for our property, and what increase in noise levels above baseline is expected at our residence, including duration?
3. Cumulative effects: what will be the cumulative impact on our property from the haul roads, their construction and use, pylon construction, and the undergrounding of the UKPN line? Could this lead to a continuous effect, and will it be assessed as one combined noise effect when considering the “10 days in 15 days” and “40 days in 6 months” thresholds?
4. When NG carried out the noise assessment, although they concluded impacts were not significant, there is provision for mitigation where thresholds are exceeded. NG propose temporary restrictions and limits on the duration of works. What are the thresholds, will assessments be carried out before works begin, and will mitigation measures be used and monitored at our property as a NSR?

5. Whiteheads Farm will be within 200m of the haul road. **What is the assessed noise level from the 100+ lorries using the haul road at our property?**

Haul roads

Please can the applicant confirm what the speed limit on the haul road will be, and how it will be monitored and enforced?

NG have used a speed limit of 20mph when assessing the noise impacts, and they also include a commitment in REP3-025, Document: 7.2 Outline Code of Construction Practice – Clean Version, Final Issue C, to:

“Impose and signpost a maximum-speed-limit on haul roads and work areas.”

Alongside restrictions on speed limits, what measures are proposed to ensure crossing points are safe, given that horses and riders will need to cross these haul roads?

What will the speed limits be at crossing points for footpaths?

Height of wires across arable fields

What has NG assessed to be the safe clearance height of the wires across arable fields, to allow agricultural vehicles such as combines to safely pass underneath the cables at their lowest point?

Position of pylons within fields

NG claim to have considered the pylon route in order to limit the effects on agriculture.

However, three of the pylons on our land are not positioned close to field boundaries. This positioning will reduce efficiency due to additional turning around the pylons and likely reductions in yield, to name just two impacts.

What measures has NG used to limit the effects on agriculture?

Document: 8.9.1 Applicant's Responses to First Written Questions
Ref LUS 1.9, Page 460

In response to soils during the routeing process:

“During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127].”

RVAA

During the site-specific hearing, NG claimed they carried out an RVAA from the public footpath. The view from the footpath gives only a limited appreciation of the effects of the pylons.

When was this assessment carried out from the footpath, and did the rear deciduous hedge still have leaves on at the time?

For example, from the rear of our property, the patio area behind our house will be most affected. The overbearing effect of having a potentially near-60m pylon within 100m of the patio cannot be properly appreciated from a public footpath located around 50m away, particularly when the patio itself cannot even be seen from that location.

It is also not acceptable for a digital model to be used instead of a true visual representation as proposed below.

Document: 8.9.1 Applicant's Responses to First Written Questions

Ref LUS 1.9

Page 460

LV 1.10

“The Applicant agrees and accepts that photomontage visualisations for the properties included within Stage 4 of the Residential Visual Amenity Assessment (RVAA) would be useful. However, due to timescales involved in agreeing land access to all properties for which this would be required, and the subsequent time which would be required to prepare each of the visualisations, providing these by Deadline 4 is not a practicable option. The Applicant instead proposes the production of a digital model that will replicate the baseline, as an alternative to capturing on-site photography...”

Will NG use a range of worst-case scenarios within the modelling, and will the visualisations be provided to each affected property owner so their accuracy can be checked by the affected party?

Looking at the RVAA assessments, along with the more recent response regarding Whiteheads Farm, there appear to be several errors and incorrect claims.

APP-233

Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment – Part 1

The initial assessment description was accurate.

Page 87:

“Clear views of the project”, “occasional filtering of views through boundary vegetation, but this would be limited, and visibility would improve in the winter months.”

It also stated that moving the pylon 50m away would reduce the magnitude to medium.

The next stage was Step 4:

Table A13.4.40 – Assessment of likely change to visual amenity – Whiteheads Farm (E8).

Initially, this assessment correctly identified that the property would experience visibility of the Project from three directions. However, it then concludes:

“It is only the side elevation first floor windows which would have direct views of the closest pylon, and the spaces associated with these windows are expected to be predominantly used at night-time (i.e. when the curtains would be closed, or when light levels restrict general visibility from those windows).”

Firstly, we do not close our curtains at night-time in the summer months when the windows are open, and secondly, are NG suggesting that we are restricted to using these rooms only at night?

This statement alone would suggest that the RVAA threshold could in fact be breached.

The more recent response to the first written questions also contains several errors which I would like to highlight.

Document: 8.9.1 Applicant's Responses to First Written Questions

LV 1.12

Pages 519–520

Question:

Residential visual amenity assessment – Braintree DC LIR. In its LIR, Braintree DC [REP1-148] notes that the RVAA [APP-233] and [APP-234] examined visual effects on 10 groups or individual properties within its district. Of these, two were identified as potentially experiencing effects that may breach residential visual amenity (E7 West Ford Farm Cottage and E8 Whiteheads Farm). In both cases, the Step 4 assessment concluded that amenity would not be breached. However, the Council expressed concern regarding the visual amenity of E7 and E8, particularly taking into account the LoD. In both cases, the overhead line is adjacent to the residential boundaries. Additional assessment was requested based on the worst-case scenario in relation to the possible LoD.

Applicant’s Response:

“For E8 (Whiteheads Farm), the worst-case scenario for this property is expected to be the placing of the closest proposed pylon in direct view of the side (south-east facing) elevation...”

The earlier assessment stated that the property had visibility in three directions. The newer assessment now states that the front elevation faces away from the project, which is not correct.

The conclusion that the RVAA threshold would not be breached due to “intervening elements of screening” also conflicts with earlier references stating that any filtering of views would be limited and would reduce further during winter months.

This latest assessment also introduces a proposed solar farm to the south-west of our property, suggesting it would have a cumulative effect while still resulting in “minimal loss of the existing green infrastructure network”.

This solar farm is around one kilometre away. If NG consider this claim valid and worth referencing, it again raises serious questions regarding the accuracy and competency of their assessment.

Looking back at my earlier representations that have not be answered :

- NG are offering either £8,000 for arable land or £6,000 for grassland. How has NG arrived at these figures?
- What does “a localised commitment during construction” actually mean, and is it legally binding?

Footpaths

NG clearly show that footpaths will be closed without diversion routes being provided, albeit NG state that this is not within their regime.

APP-359

7.6 Outline Public Rights of Way Management Plan (Final Issue A)

As an affected landowner, whose responsibility it is not to obstruct footpaths, how will these closures be “managed”, and what are the plans where no diversion route is available?

Trees

APP-052

Document: 2.16 Trees and Hedgerows to be Removed and/or Managed Plans – Section E

Looking at the initial maps for Section E, there appeared to be around 150 individual trees affected.

However, NG state in APP-256, Page 15, that within Section E only 8 trees and 1 group of trees are to be removed.

On our farm, I have no idea what trees are being replaced or where replacement planting will take place.

I have inserted the plan of the trees that are to be removed between pylon TB96 and TB97.

I have attached a photo showing the trees due to be removed in the field corner between TB96 and TB97, for the same area, taken 3/5/2026. Are any of these included within the “8 trees” or the “single group of trees” referred to by NG?



Photo showing trees that are to removed between TB 96 and TB97



Can NG identify where the map is that shows which trees are to be replaced? If no such map currently exists, can one be provided? This should also indicate which trees are category 1 and category 2 trees.

Working hours

Commitment VN01 states that monitoring of noise and vibration is:

“To be confirmed by the Main Works Contractor(s) if Project is consented.”

We have not been provided with any estimates or assessments from NG to justify their claims that extended working hours, outside of the ‘daytime’ periods identified in BS 5228-1:2009+A1:2014, will not “directly lead to a significant adverse effect”.

To support this claim, detailed predictions and assessments are required to establish whether the predicted level of construction activity, at the distance our property is from the construction works, would cause adverse noise or vibration impacts.

The Applicant states:

“The Applicant is reviewing the provisions of the draft DCO as requested with these matters in mind...”

The response goes on to reference the ABC method under BS 5228-1:2009+A1:2014 and commitments NV01–NV05 within the Outline Code of Construction Practice. However, despite referencing these documents, NG still have not clearly answered the concerns raised regarding extended working hours, noise thresholds, monitoring, and mitigation measures specific to our property.

Visualisations

APP-232-Document: 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4, Viewpoint 5.17: PRoW south of Silver End (Silver End 18) (View Direction 96)

This is a visualisation from the same area that my earlier photo but further away but still shows the plan trees that are to be removed shown on the right in the visualisation.

The photograph shows well established trees that have been there for at least 30 years. The visualisation includes trees still in place which NG show will be removed on map APP-052, Document: 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section E, page 6). Therefore, the visualisation is not a true reflection as the landscape would be more visually damaged than they have represented due to removal of the trees. I believe the pylons will be more visible than the visualisations show, as in reality, there will be far less tree screening. As this viewpoint is visible from Silver End Footpath 16, the footpath view will be blighted too.

Viewpoint 5.17: PRow south of Silver End (Silver End 18) (View Direction 96)

Document: 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment

This visualisation is the same views but more distant of the 6 trees that will be removed, unfortunately NG have chosen to leave them in place , it does reduce the impact.

Behind the pylon TB97 under the wire lines are more trees that will be removed.



Looking back through my earlier representations, a number of my questions were not answered by the applicant. In some cases, responses have been given, and in others they simply refer back to documents which themselves do not answer the question being asked.

Going forward, please can the applicant answer the specific question directly first, and then provide the relevant document references afterwards.

