

John Stacey



Interested party 

Further Submission dated 11/06/2026

Contents

Haul Road speed limit

Dust

Payment rates for landowners.

Comments on Braintree District Council Submission: ■ ISH2 Post Hearing Submissions including Action Points representation REP4-323

Document: 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3

Comments on Response from NG to my submission

Comments on EP4-151 Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment - Tracked Changes Version - Part 2

Haul Road Speed Limit

Having reviewed the latest documents submitted by National Grid (NG), I cannot identify a response to my question regarding the speed limit for the haul road, which I raised during the Issue Specific Hearing.

The comments below relate to the latest submissions and to other concerns that have not previously been raised.

Dust

One of our principal concerns is dust, particularly from the haul roads, which will be approximately 200 m from our house.

In our experience, dust can easily travel 200 m.

It is noted that one of the proposed mitigation measures for dust is contained within:

REP-166

Document: 7.2 Outline Code of Construction Practice Appendix D – Outline Dust Management Plan (Clean Version)

However, it is unclear whether the use of the haul road forms part of the construction process covered by this document.

The document is also unclear regarding the measures that are proposed. For example, under visual assessment it states:

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

In relation to monitoring, it states:

"Monitoring would be undertaken either at the Order Limits of the site closest to receptors or, for larger areas, at locations upwind and downwind of the prevailing wind direction."

Does this mean that checks will be undertaken daily, or more frequently, outside the draft Order Limits? If so, this could result in monitoring activities affecting private property.

Page 23 – Section 7.2 Dust

Mitigation Measure

"Impose and signpost a maximum speed limit of 15 mph on surfaced roads and 10 mph on unsurfaced haul roads and work areas."

Dust arising from the haul road remains one of our key concerns, as it is likely to be used throughout much of the construction period and may only be removed once the project becomes operational.

In this case, any monitoring of dust levels would need to take place outside the draft Order Limits and could result in an excessive intrusion into private property.

There is also potential for crops adjacent to the haul roads to be affected, with yields reduced as a result of dust settling on leaf surfaces.

Payment Rates for Landowners

One question that remains unanswered is how NG has arrived at the following payment rates:

A one-off payment in respect of permanent rights per tower and associated oversail, including access rights:

- Permanent grassland – £6,000 (or a proportion based on land ownership)
- Arable land – £8,000 (or a proportion based on land ownership)

These figures are considerably lower than those being offered by EirGrid to landowners affected by its North–South Interconnector project.

EirGrid is offering an upfront payment of €43,000 for pylons and €140 per metre for power lines. In addition, there is a minimum payment of €8,000, and landowners may seek further compensation within six years.

By comparison, the payments being offered by NG are extremely low.

For example, if a line crosses 40 m of land, the payment offered would be approximately £500.

Below are my comments in red to the latest submission and other matters not raised so far.

Comments on Braintree District Council Submission: ■ ISH2 Post Hearing Submissions including Action Points representation REP4-323

Page 18

4.2 Item 4 – Noise and Vibration – Piling

4.2.4 The Council acknowledges that, during typical construction hours defined in BS5228-1 (i.e. 07:00–19:00 Monday to Friday and 07:00–13:00 on Saturdays), exceedances of the 65 dB LAeq,T ‘ABC’ threshold may in some cases be relatively small. However, this position does not account for the extended construction hours sought by the Applicant, which go beyond those standard periods.

4.2.5 The construction hours sought through the DCO would allow piling activities to occur on Saturdays between 07:00 and 17:00. BS5228-1 is clear that periods outside 07:00–13:00 on Saturdays should be treated as more sensitive, with a corresponding lower threshold of 55 dB LAeq,T. On this basis, noise levels which may only marginally exceed thresholds during standard hours would result in materially greater exceedances during these more sensitive periods and should therefore be regarded as giving rise to significant adverse effects.

We strongly agree with BDC position, if the hours are as planned in the DCO our human rights could be affected.

Page 20

4.3 Item 8 - Landscape and Visual Effects - Residential Visual Amenity Assessment

4.3.1 With regard to Hearing Agenda Item 8, the Applicant was asked by the Examining Authority to confirm the methodology used in undertaking the Residential Visual Amenity Assessment (RVAA). The Applicant confirmed that assessments were undertaken from the nearest publicly accessible locations, and that individual residential properties were not visited. The Council has concerns that this approach does not fully align with Landscape Institute Technical Guidance Note 2/19 (Residential Visual Amenity Assessment), which states that “where access to private property cannot be obtained, and having employed best endeavours to do so, assessment may then be undertaken from appropriate publicly accessible locations” (Paragraph 4.21). The Applicant has not demonstrated that such best endeavours were undertaken in this case.

4.3.2 The Council has previously identified potential breaches of residential visual amenity at E7 West Ford Farm Cottage and E8 [REDACTED]. These properties were specifically identified for detailed consideration within the RVAA, yet it appears that no property-level assessment has been carried out. In the absence of direct assessment from within the residential curtilage, there remains uncertainty as to the magnitude of effects, particularly when the Limits of Deviation are taken into account.

4.3.3 This uncertainty directly relates to Action Point 25, which seeks to secure additional visualisations to illustrate realistic worst-case scenarios for these properties.

We await with interest the visualisation for the worst case scenarios and the visualisations in EP4-151 Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment are not acceptable.

Document 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3

Response to Braintree District Council (REP3-090)

Pages 177–178 – Paragraph 3.2.2

National Grid's response states that construction noise has been assessed on a worst-case basis and that movement of pylons within the Limits of Deviation (LoD) would not result in significant adverse effects.

However, the response relies heavily upon assumptions regarding future mitigation measures and detailed contractor assessments. Whilst NG states that no significant adverse effects have been identified, it remains unclear how this conclusion can be reached with certainty when the final locations of works have yet to be determined.

The response also relies on the assumption that noise levels can be reduced through mitigation and, where necessary, by applying temporal restrictions. This does not provide reassurance that the actual impacts experienced by nearby residents will reflect the assessments currently presented.

Pages 178–179 – Paragraph 3.2.4

Braintree District Council correctly identifies that the Limits of Deviation allow movement of pylons and construction areas within the Order Limits. Whilst NG refers to various practical constraints, these constraints are not secured within the DCO and may change as the project progresses through detailed design.

As a result, there remains a risk that works could ultimately be located closer to Noise Sensitive Receptors than assumed within the Environmental Statement, leading to greater impacts than those currently predicted.

Pages 178–180 – Paragraph 3.2.5

National Grid states that a review of potential pylon movement within the Limits of Deviation was undertaken and that no locations were identified where significant adverse effects would arise in practice.

However, this review has not been made available for independent scrutiny. Consequently, affected parties are unable to assess the methodology used, the assumptions applied, or the validity of the conclusions reached.

The fact that twelve locations were identified where movement within the Limits of Deviation may result in residual significant adverse effects from construction noise demonstrates that this issue cannot simply be dismissed. Whilst NG subsequently concludes that practical

constraints would prevent such impacts occurring, the evidence supporting this conclusion has not been provided.

Comments on Response from National Grid to My Submission (J Stacey)

REP4-301

Document: 8.5.6 Applicant's Written Summary of Oral Submissions to Compulsory Acquisition Hearing 2

Alternative Routes and Request to Move Pylons TB96, TB97 and TB98

National Grid states that there is limited scope to move TB98 further because of electrical clearances, safety requirements and span lengths.

Previously, however, National Grid justified the current alignment on the basis of the Holford Rules and the requirement for an additional angle pylon. The justification now appears to rely primarily upon span lengths.

This is difficult to understand, as moving the alignment out of the horse paddock would only require an additional 20–30 m of route length.

The approximate span lengths are:

- TB94 to TB95 – approximately 430 m
- TB95 to TB96 – approximately 430 m
- TB96 to TB97 – approximately 390 m
- TB97 to TB98 – approximately 355 m
- TB98 to TB99 – approximately 320 m
- TB99 to TB100 – approximately 320 m

To avoid the horse paddock, TB96, TB97 and TB98 would need to be moved further west. This would increase the span lengths between TB95 and TB99; however, these spans would still not be excessive and would remain comparable to, or shorter than, other spans along the route.

In addition, the landowner affected by TB94 has requested that this pylon remains further to the west.

Comments on Engagement

National Grid stated that a meeting would take place on 12 May 2026 to address a number of outstanding issues, including the relocation of horses and practical matters relating to crossing points. UKPN was also expected to attend.

That meeting has now taken place.

My understanding was that the meeting would provide information regarding:

- Crossing points for the farm;

- National Grid's proposals for managing the impact on our horses;
- The possibility of moving the red line boundary, pylon and haul road further west to avoid the horse paddocks;
- Management of land adjacent to the draft Order Limits;
- The location of SuDS features;
- Speed limits on haul roads;
- Tree replacement proposals;
- Biosecurity measures; and
- Badger set protection.

These were among the issues for which we expected clear answers.

Unfortunately, no substantive information was provided. These matters had already been discussed with National Grid's agent on 12 February, and we had been led to believe that answers would be forthcoming.

As of 8 June, we still have not received answers to these questions. This is not acceptable given that National Grid has had approximately four years to develop its proposals.

Document: 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 on my submission REP3-159

REP-298– Pages 331–332

Construction Noise

National Grid states that construction noise is assessed against fixed thresholds in accordance with BS 5228 rather than against background noise levels.

However, National Grid has also assessed the magnitude of effect at Jasmine Cottage, where it predicts an increase in noise levels of 11.4 dB arising from construction traffic. This increase is described as a large adverse impact.

It is therefore evident that the assessment considers more than simply fixed threshold levels.

Pages 335–336

Residential Visual Amenity

National Grid acknowledges that, under a worst-case scenario, a pylon could be located approximately 75 m from our garden and approximately 100 m from our house.

Given that the pylon could be almost 60 m in height, compared with a dwelling of approximately 12 m in height, it is difficult to understand how National Grid can conclude that there would be no breach of the Residential Visual Amenity Threshold.

National Grid states that [REDACTED] would experience views of the project from only two elevations.

This is incorrect.

[REDACTED] would experience views from three elevations, not two as stated within the assessment.

In reality, the only room within the house that would not have views of the project is the bathroom.

Page 336

National Grid recognises that there will be a high magnitude of visual change.

It is therefore important to understand whether this assessment was undertaken on the basis that the line and pylon could potentially be located approximately 100 m from the property, with the nearest pylon approaching 60 m in height.

National Grid's response refers to TB98 as reaching a height of 53.84 m AOD.

It is concerning that National Grid appears not to acknowledge that, under the permitted Limits of Deviation, a pylon could potentially be approximately 6 m taller than this figure.

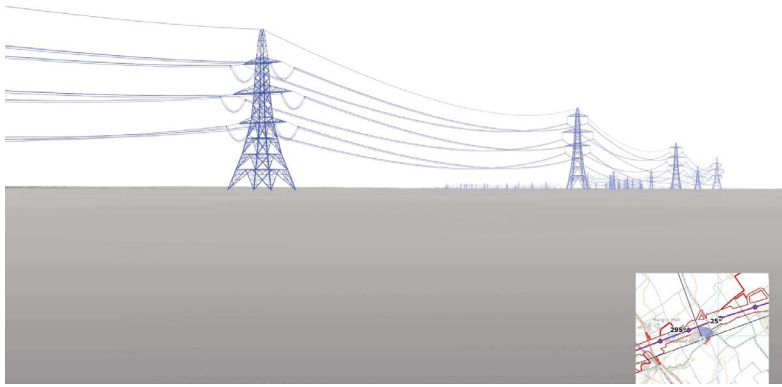
EP4-151

Document: 6.13.A4 Environmental Statement Appendix 13.4 Residential Visual Amenity Assessment – Tracked Changes Version – Part 2

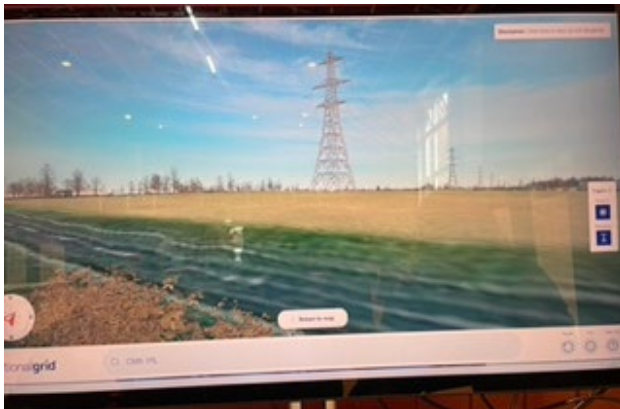
[REDACTED] (E8)

The image presented on page 27 is wholly unrealistic:





It suggests that it is possible to see approximately 80 pylons, with the furthest located more than 15 miles away. This does not present a realistic representation of the visual experience from the property.



This final image, shown at one of the consultation events, whilst not entirely accurate in relation to vegetation, at least demonstrated the full scale of the height difference between the proposed pylons and the surrounding trees:

REP4-170

Document: 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan

Section 4.4.7 sets out the information that will be included within a Section 61 application, including:

- Proposed construction methods and plant;
- Working hours and any justification for departures from core hours;
- Programmes of work identifying the duration and location of significant noise- and vibration-generating activities;
- Predicted noise and vibration levels;

- Mitigation measures;
- Monitoring proposals; and
- Notification procedures for affected residents and stakeholders.

Whilst these commitments are noted, they reinforce the fact that many important details regarding construction impacts, monitoring arrangements and mitigation measures have yet to be finalised.

As a result, affected residents are currently being asked to assess the impacts of the project without access to information that will ultimately determine the extent of those impacts in practice.