

Broad Oak Preservation Society

Richborough Connection

Response to Examining Authority's First Written Questions

Q1.2.23	<p>As with many of the documents drafted by the Applicant, their sole purpose appears to us to minimise the impact of their proposed development, and where this cannot be done, to imply that the character of the area through which they wish to run their new overhead line has already been so degraded by other developments that it is acceptable to impose yet more deterioration. Their focus is always on the impact on landscape looking in, not on landscape looking out. For example, paras. 16.4.65 to 16.4.68 appear to imply <i>inter alia</i> that the residential settlement of Broad Oak has itself degraded the landscape, so imposing the new overhead line will have little extra impact. We, the residents of Broad Oak, whose position should be respected and who should be the focus of concern over the impact of the proposed overhead line, are being cast in the role of being “the blot on the landscape”, which justifies further intrusion.</p> <p>What should be considered is the landscape as observed from the residential settlement looking away from Broad Oak, which will be significantly downgraded. Yes there are existing pylon lines visible to the west of the village. There is a 400kV line just over a kilometre away, and a 132kV line 500m away at their closest points. These are just visible from some properties in the village, but they generally merge into the background. Their presence does not mean a that a third line, a 400kV line with 50m tall pylons only 250m away, can be passed off as a small additional deterioration in the landscape.</p> <p>The Applicant makes much of the benefits of removing the existing 132kV line. This line passes largely to the south of the village through wooded areas, and is largely unseen. It only impinges on the village where the line crosses Shalloak Road and it is the overhead cables which are seen, not the supporting pylons. To suggest that the benefits of removing this line and its six supporting 25m pylons outweighs the impact of the proposed new line is frankly absurd. The existing line is 1,140m long between PX8, close to the entrance to Dengrove Park on the western side of Shalloak Road, and PX13 on the eastern side of Herne Bay Road. The proposed new line runs for 2,280m, exactly double the distance, between pylons in similar locations (PC5 and PC11) with one additional pylon.</p> <p>Nor is it accurate to suggest, as the Applicant attempts to do (APP-030, para.16.4.66) that the proposed new line avoids Broad Oak. For a considerable length the proposed new line would be within 250m of many of the houses in the village, and it too would cross Shalloak Road about 100m south of the existing PX route crossing.</p> <p>It should also be remembered that the removal of the existing line is not dependent on the proposed new line following the exact route now being proposed by the Applicant. As long as there is an alternative supplying power to Thanet, the existing line can be removed. Thus if the Nemo link makes landfall at Sandwich, and then continues to Canterbury by an alternative route or as an underground cable, or even if it went back undersea to the Isle of Grain, the old line would become redundant. Given the option we would prefer the retention of the existing line to the imposition of the proposed new overhead line.</p>
Q1.5.4	We do not have the technical knowledge to respond to this question.
Q1.5.8	Although this question was not addressed to other Interested Parties such as ourselves, we would like to comment as one of the communities likely to be affected by road closures and alterations. We consider 28 days is too short a time for the street authority to consider any proposed alteration to the layout of a road or its temporary closure, and consult with local residents affected by such a proposal. We suggest a period of 56 days should be the minimum. The DCO does not appear to address what

	would happen if the street authority refuses consent. Does the Applicant consider it can go ahead regardless?.
Q1.5.14	Should the Applicant's proposed development proceed, we consider that the Applicant should be required to remove all foundations of whatever depth which have either been laid down to support temporary structures or pylons, or which were the foundations for the pylons forming the PX line to be removed. This is necessary to avoid any compromise on the future use of the land.
Q1.5.36	We have no comment to make on this question.
Q1.5.37	<p>We consider the working hours set out in Requirement 7 are excessive. They would allow 14 hour working on weekdays, and continuous working with only one day's respite every 14 days. The noise and traffic generated during these working hours could make live unbearable for local residents. We propose that at any location within a mile of a habitation, the working hours should be limited to 08:00 to 18:00 on weekdays and 09:00 to 17:00 on Saturdays. Working on Sundays and Bank Holidays should be forbidden. These limits should only be breached in an emergency.</p> <p>We also support the proposal that the definition of construction work should include the starting up and shutting down of vehicles and plant, the servicing of vehicles and plant on site and the ingress and egress of vehicles to work sites, including the delivery of materials and plant. Furthermore, the passage of HGVs through inhabited areas to reach remote work sites should be restricted to the working hours set out above. All road stoppages should be removed on Sundays and Bank Holidays.</p>
Q1.5.42	We have no comment to make on this question.
Q1.5.43	We have no comment to make on this question.
Q1.5.58	We have no comment to make on this question.
Q1.6.6	None of the sites listed in Table 8.9 are in the vicinity of Broad Oak and accordingly we have no views on this matter.
Q1.6.7	<p>No, we do not agree, if the effect of scoping out the listed buildings in Broad Oak is that the effects on these buildings will only be considered after the route of the line is fixed and once it has SoS approval (should that be granted). It will then be too late for any ameliorative action to be take.</p> <p>Despite being scoped out in APP-029, these assets are considered individually in APP-084, which is perhaps the later consideration referred to in the earlier document. We disagree with most of the conclusions in this document as it applies to Broad Oak.</p> <p>Sweech Farmhouse and associated buildings: These buildings would have a clear line of sight across open countryside to PC10, which would be approximately 600m distance. There are no intervening buildings. It is difficult to see how planting could be sufficient to obscure views of the pylons and overhead cables. These buildings are currently shielded from views of the existing PX line by mature planting and the houses in Sweechgate, so there is no compensative positive change resulting from the removal of the PX line as claimed by the Applicant. We find in incongruous that the Applicant should suggest that the removal of 25m tall pylons and their replacement by ones which are 50m tall can be considered an improvement in the visual outlook, but this is not the only place were the Applicant advances such views.</p> <p>124 Sweechgate: This asset is not protected by intervening buildings or planting. There would be a clear line of sight to the overhead cables between PC8 and PC9 at a distance of 340m. We cannot see how planning to be sufficient to obscure this view.</p> <p>Summer Hill: We have been unable to identify the location of this property in the vicinity of Broad Oak. From the Canterbury City Council schedule of listed buildings it does appear there is a road in Harbledown to the NW of Canterbury which contains a number of listed buildings. We do not wish to comment further on the inclusion of this</p>

	<p>entry in the Applicant's document.</p> <p>Broad Oak Farm: We agree that Broad Oak Farm would not be affected by the development if it were to go ahead. This property is set back sufficiently far from Sweechgate on the southern side that it would be shielded from views of the overhead line by the houses on the north side of Sweechgate.</p> <p>Royal Oak Public House: Contrary to the assertions by the Applicant in APP-084, this property has clear views across open country to the route of the proposed overhead line. It is 380m from the location of PC9. There are no intervening buildings and only low intervening hedgerows.</p> <p>We believe there are two listed properties in Broad Oak which the Applicant has not considered, unless they are dealt with elsewhere in APP-084:</p> <p>Vale Farmhouse: This property in the bottom of the Sarre-Penn valley, approximately 440m to the north of PC9. The proposed route is on the southern slopes of the Sarre-Penn valley; views from this asset to the south would be looking up the slope of the land and have the pylon route dominating the skyline. We can see no way this can be mitigated.</p> <p>Goose Farm: This property is close to the centre of Broad Oak on the western side of Shalloak Road. The overhead line between PC6 and PC7, if built, would be no more than 200m from Goose Farm. At the moment Goose Farm enjoys open views in a westerly directions, and there is no way in which views of the line could be screened.</p> <p>We would like to use this question as an opportunity to comment on the issue of screening. There are a number of places where the Applicant has referred to the possibility of screening views of the proposed overhead line with newly planted hedges and trees. This possibility was also mentioned at the public consultation meetings. Given the height of the proposed pylons it is not possible to have screening plants close to the overhead line. Having 50m tall groups of trees would themselves be obtrusive, and technical considerations would preclude this from being seen as a solution. At a location 250m from a pylon, it would require a hedge 4m tall planted 20m from the location to provide complete screening. A hedge this tall, even if allowed by local planning guidance, would itself be an intrusion, destroying any view across open countryside which are a feature of many of the properties in our village. We should not be forced to be hemmed in by excessively tall hedgerows. There is also the question of how long it would take to grow such a hedge. It may provide screening in 15 to 20 years, but not in the immediate future.</p>
Q1.6.16	Our response to Q1.6.7 above is also relevant to this question.
Q1.7.5	No. The Applicant's methodology appears to have been selected to ensure that its landscape assessment produces the answer it requires, namely that there are no significant landscape impacts arising from the proposed scheme. The major failure of the Applicant's methodology, as stated in answer to an earlier question, is that it adopts a stance of assessing the impact on landscape looking in from a distance, not on landscape looking out, from localities close to the proposed overhead line.
Q1.7.7	No. The impact on landscape and views from many properties in Broad Oak would be highly adverse, given the proximity of the proposed line to properties in the village, particularly those on the southern side of Mayton Lane and the western side of Shalloak Road. The proposed line and its supporting pylons will be highly dominant features of the landscape, impossible to avoid or screen.
Q1.7.9	No. As with Q1.7.7 above, we content that the adverse effects on some properties in Broad Oak exceed the tipping point, given that there are already two existing overhead power lines visible from properties in Mayton Lane and Shalloak Road.
Q1.7.16	Our responses to Q1.7.5, Q1.7.7 and Q1.7.9 are of relevance here.
Q1.7.29	Our responses to Q1.7.5, Q1.7.7 and Q1.7.9 are of relevance here. At the risk of repeating ourselves, the methodology and its application appear designed to deliver

	<p>the answer which the Applicant requires, lacks any way of objectively assessing the visual impact of a 50m pylon constructed 200m from a dwelling for the inhabitants of that dwelling. Landscape only seems to be something to be observed from a distance.</p>
Q1.7.30	<p>This question was addressed to the Applicant, but we would like to use this opportunity to highlight for the ExA the option of using a High Voltage Direct Current (HVDC) underground cable link. From the Nemo landfall at Sandwich all the way to the Applicant's facilities in Canterbury, where the converter station would be sited The connection would in effect be an extension of the undersea cable, working at the same voltage as the Nemo Link (400kV). We did include this option in our March 2015 response to the Applicant's public consultation.</p> <p>In our view the use of HVDC technology offers a number of advantages. The cable could follow the shortest possible route between Sandwich and Canterbury, and could follow the Stour valley and the railway line for much of its length, thus completely avoiding Broad Oak. There is of course no visual intrusion once an underground line has been laid. Whenever we have suggested to the Applicant that undergrounding should be the preferred way to proceed, the Applicant has, in addition to rejecting this on grounds of cost, drawn attention to the width of the trench required and the restrictions on the future use of the land above. This may be true for an AC connection, which we are led to believe would require six cables (to mimic the six conductors used in an overhead line) with wide separation between the individual cables. Our understanding is that an HVDC connection would require at most two cables, which are separated by only a few metres. The land use is therefore significantly reduced, and so presumably is the cost as the amount of cable required is so much less. Construction costs should also be much reduced compared to an AC underground line. The current scheme envisages a short length of underground HVDC cable from the landfall point near Sandwich to the proposed converter station at Richborough. At the Belgian end of the Nemo Link there will be a 9km length of underground HVDC cable from the landfall point to the converter station near Bruges.</p> <p>What we were not aware of when our 2015 response was prepared, was that the Applicant has adopted HVDC technology for another scheme, exactly as we advocate for the Richborough Connection. The Western Link is a joint venture between National Grid and Scottish Power Transmission for a link between the English and Scottish grid systems, which is now under construction. The route is runs from Hunterston in Scotland to Flintshire Bridge on Deeside in Cheshire. For most of its length the HVDC cables runs under the Irish Sea around the Isle of Mann. It comes ashore at the tip of the Wirral peninsular and then continues underground for 33km (approximately the same length as the Richborough Connection) to the converter station at Flintshire Bridge. The Western Link is designed to convey up to 2.2GW of power, over twice that of the Richborough Connection. On the Western Link website, National Grid say:-</p> <p style="text-align: center;"><i>DC circuits can transmit power more efficiently over long distances on fewer cables than equivalent AC circuits</i></p> <p>From their involvement in the Western Link it is clear that the Applicant has technology which would provide a wholly acceptable solution for the Richborough Connection, which would have no long term detrimental effects. We hope the ExA will ask the Applicant why this solution is not being considered, and for them to do so even at this late stage.</p>
Q1.7.32	<p>Table 12.1 in the SOR appears to suggest that for the Applicant's preferred option (SO1) the capital costs for underground cables are only twice those for an OHL. During the public consultation and in later meetings the Applicant has used much higher multiples (up to ten times the cost) to justify their choice of OHL.</p> <p>We do not understand why the lifetime cost of underground cable is shown has being so much higher than OHL, and there is no explanation that we have been able to find in the SOR.</p> <p>It is not clear to us whether the cost of removing the 132kV PX line has been included in any of these costings.</p>

	The summary remarks appertaining to option SO1 do not put adequate emphasis on the significant loss of visual amenity for residential communities along the route, in particular for Broad Oak.
Q1.7.34	We agree with the arguments in paras.F5 – F11 for the issues to be scoped out of consideration in the SOR. The only possible exception might be para.F9 (water resources) but that is a matter best addressed by SEW.
Q1.7.37	<p>We are grateful to the ExA for challenging the Applicant on this point.</p> <p>It should be remembered that our comments on the additional costs of undergrounding were restricted to the additional cost of undergrounding over the last 3km of the proposed route around Broad Oak and into the grid connection point at Canterbury North, not for the undergrounding of the whole length of the connection.</p> <p>However we now wonder whether our earlier consideration of the impact of the additional costs was based on a misunderstanding of the structure of the electricity supply industry. During the public consultations it was constantly stressed that:</p> <ul style="list-style-type: none"> (a) National Grid has a duty to connect any new electricity generating facility which may be created, and (b) the costs of such connections are recovered from electricity consumers through their regular electricity charges; <p>and as a consequence National Grid's highest priority was to minimise the costs of providing connections to new generating facilities to protect electricity consumers.</p> <p>On reflection we now wonder if this approach is correct. Leaving aside whether the Nemo Link should be considered as a new electricity generator (the consequences of splitting what we think should have been seen as one scheme into two parts are discussed elsewhere), it cannot be right that consideration of the costs of connecting a new generating station to the grid should effectively play no part in decisions about where the station should be sited. We accept that nuclear power stations should be located in relatively remote locations for safety reasons, and no one wants to see any kind of power station on their doorstep, the cost of connecting to the grid is an intrinsic part of the cost generation by any new station. To ignore the cost of connection is to distort the basis on which decisions on new power stations should be made.</p> <p>We also now question whether these connection costs impinge directly on consumers bills. National Grid is no longer a nationally owned asset – it is a private company, a PLC with shareholders, whose objectives include the generation of profits. In 2015 the company made an operating profit of £4.1bn. As with any other commercial enterprise, the company makes decisions about investment in its infrastructure, from which it hopes to generate additional revenue streams. It works in a regulated environment controlled by Ofgem, which determines how much can be charged for transmission costs to electricity generators and suppliers, and hence what the consumer is ultimately charged. We question whether there is any direct feed-through of the costs of the Richborough Connection to end users electricity bills. It is in National Grid's interest to minimise infrastructure costs so that their profits can be maximised.</p>
Q1.7.38	We accept the notion that concerns about the potential adverse landscape and visual effects have to be serious for undergrounding to be the automatic choice for a new power line. What amounts to serious concerns is a wholly subjective judgement, not susceptible to quantification. We have commented before that the assessment of the effects of a new line tend to be considered looking in from a distant viewpoint, not looking out from settlements close to the route. It cannot be denied that having a 50m tall pylon erected at the end of one's garden is gross intrusion into the visual outlook enjoyed by residents. If this does not pass the serious concern test in the NPS, we would be interested to know what, in the judgement of the Applicant, would pass that test.
Q1.7.39	Responding to this question seems like going over old ground, as the same general issue is addressed from several angles. Without wishing to be too repetitive, we

	<p>reiterate our view that the Applicant has at all times tried to down-play the impact of the proposed new line on the visual amenity and outlook of our community. Our contention is that the scale and proximity of the proposed development is such as to have a highly significant impact on Broad Oak, which justifies undergrounding or the adoption of an alternative route altogether.</p>
<p>Q1.7.40</p>	<p>The Applicant has throughout been determined to skew all assessment and judgements regarding the proposed new line in favour of an overhead solution. There has been scant consideration of the impact on residential areas, as would be required by NPS EN-5, para.2.8.9. For example, para.7.229 of the COR says</p> <p><i>While the underground alignment option (5) offers minor long-term visual amenity benefits to the local communities of Broad Oak and Sturry, this is not considered sufficient to differentiate this option from the overhead line alignments or to justify the additional costs. Overall, it is not considered that an overhead alignment would result in such a substantial change to landscape and views that it would necessitate undergrounding.</i></p> <p>The key point here is by whom is it considered that undergrounding only offers minor visual amenity benefits to Broad Oak? How can the imposition of seven 50m tall lattice pylons in close proximity be considered only a minor loss to our visual amenity? This is the Applicant's own conclusion to support its desired conclusion.</p> <p>The Applicant makes much of the benefits to Broad Oak of the removal of the PX 132kV line. How can the removal of six 25m pylons be of significant benefit but the imposition of the 50m tall pylons is only a minor dis-benefit?</p>
<p>Q1.7.42</p>	<p>Table 12.1 in the SOR, referenced in Q1.7.32 does appear to support the view that the route was chosen primarily on the ground of cost. Other factors were discussed in the SOR, but anything which appeared to favour another outcome was down-played, or spurious considerations were brought into the equation. For example, in the summary of the SOR we find:</p> <p><i>12.33 The overhead line connection option between Richborough and Canterbury would be the least expensive of the technological options under SO1. Underground cable or GIL connections between Richborough and Canterbury North would be significantly more expensive and would offer limited landscape and visual benefits.</i></p> <p>It is hard to see how an underground solution which removes the requirement for 70 pylons of 50m height across the East Kent countryside can be said to offer only limited landscape or visual benefits. In our view the benefits would be major. National Grid have tried to argue in a number of places that by running the new line along the route of the existing 132kV line means that the landscape effects and visual intrusion is unchanged. This is not true as 25m tall pylons would be exchanged for new 50m tall pylons. The final route selected does not mirror the 132kV line exactly, especially around Broad Oak. If an underground solution were chosen, the 132kV line would still become redundant, and could be removed, thus giving rise to landscape enhancement. This factor has been ignored in the SOR.</p>
<p>Q1.7.43</p>	<p>We think the Applicant has ignored most of the Holford Rules:</p> <p>Judgement of what constituted an area of high amenity value is totally subjective, but we consider Broad Oak with its rural views and tranquillity is one such area. This component of the Holford Rules also appears to imply that an area which has some amenity value, but not the highest, can be further despoiled by the imposition of a new overhead line.</p> <p>The approach line to the Canterbury North sub-station passes through "pleasant residential and recreational land" but there has been no careful assessment of the comparative costs of undergrounding – it has been rejected out of hand.</p> <p>The route around Broad Oak will be viewed against a sky background and there are</p>

	<p>already two cable lines visible looking westwards from the village. This has not been taken into account in the Applicant's assessment of alternatives. In fact their position is the opposite of the Holford Rule. They take the view that because two existing lines are already visible, another will not give rise to a significant further deterioration in amenity, even though the new line is twice as high and half the distance of the nearest existing line.</p>
Q1.7.44	<p>Within the parameters that the Applicant set for itself at the start of the RCS, we cannot disagree with the decisions taken with regard to the topics to be included within the scope of the exercise. Our fundamental disagreement with the Applicant is that it had by this stage already made a decision that an overhead line was the technology of choice, and therefore there was no effective serious consideration of alternatives such as undergrounding or using an offshore route. This was at the time when the Applicant was still making promises to local people that all possible technologies would be considered. We also consider that the RCS was flawed in that it only considered the potential benefits which would arise from the removal of the existing PX line applied to the North Corridor option. In reality the PX line can be removed whatever technology or route for the Richborough Connection is used.</p>
Q1.7.48	<p>We have no observations to make on this question</p>
Q1.7.51	<p>We have no observations to make on this question</p>
Q1.7.67	<p>We do not see how any mitigation planting is possible. We commented on this in response to Q1.6.7. Given the height of the proposed pylons it is not possible to have screening plants close to the overhead line. Having 50m tall groups of trees would themselves be obtrusive, and technical considerations would preclude this from being seen as a solution. At a location 250m from a pylon, it would require a hedge 4m tall planted 20m from the location to provide complete screening. A hedge this tall, even if allowed by local planning guidance, would itself be an intrusion, destroying any view across open countryside which are a feature of many of the properties in our village. We should not be forced to be hemmed in by excessively tall hedgerows. There is also the question of how long it would take to grow such a hedge. It may provide screening in 15 to 20 years, but not in the immediate future.</p>
Q1.7.68	<p>As we do not think planting can provide sufficient screening to mitigate the visual intrusion of the proposed overhead line, we cannot comment on this question in a meaningful way.</p>
Q1.7.70	<p>The period suggested is inadequate. Any new planting to replace hedges or trees removed during the construction phase (if the line were to go ahead) or to enhance any affected areas should be subject to a 25 year maintenance and replacement liability period on the part of the Applicant. We suggest this mainly to ensure that the initial planting and maintenance is done to a sufficiently high standard.</p>
Q1.8.26	<p>Many of our members feel concerns about the effects of EMFs, but we acknowledge that reliable scientific evidence on the effects of EMFs is hard to come by and can be ambiguous in nature. While we would like the ExA to be aware of residents' concerns, we have deliberately avoided using EMFs and their potentially damaging effects in our arguments against the proposed new overhead line. We think all parties would agree that the perceived EMFs generated by underground cables are much lower because of the shielding effects of the over-burden.</p>
Q1.9.7	<p>Much of the agricultural activity in the areas around Broad Oak where pylons might be sited comprises fruit production. Apart from the actual footprint of the pylon towers where clearly no production is possible, we accept there would be little significant impact on production, which is carried on using relatively small machines. We therefore accept the conclusion in the ES.</p> <p>However we would ask if sufficient consideration has been given to the impact on economic activity during the construction phase, when much larger tracts of land may</p>

	be blighted and access to fields and orchards disrupted.
Q1.12.5	Given the height of the proposed pylons, it seems highly likely we will be inflicted with further disturbance from lights fixed to the top of the pylons to make them visible at night.
Q1.12.6	Given the proximity of the proposed route to many properties in Broad Oak, we consider the inspection of the overhead line (if built) using helicopters would be unacceptable between PC4 and PC11 on grounds of disturbance and safety.
Q1.12.17	We intend to submit a separate Written Representation on the Applicant's Traffic Plan, which has not been the subject of any public consultation. The roads leading into and through Broad Oak are all narrow, and are in many cases subject to a 7.5 tonne weight limit.
Q1.12.32	We have commented elsewhere that we do not see how any meaningful mitigation can be possible, given the scale of the development proposed.
Q1.12.38	This question is beyond the scope of our knowledge and expertise for us to comment.
Q1.12.44	<p>Broad Oak Preservation Society is an unincorporated body whose membership extends to all residents of the village of Broad Oak. It functions to co-ordinate and present the views of villagers on major developments which may affect the village, with the intention of protecting the rural tranquillity and relative isolation of the village which are the reasons many residents have chosen to make their homes here. It can be considered the residents' association of the village. The Society has its origins more than 40 years ago, when the creation of the reservoir was first proposed. It has been most recently active concerning the latest SEW reservoir scheme, the impact of the Canterbury City Council Draft Local Plan and of course the Applicant's proposals for the Richborough Connection.</p> <p>Broad Oak Preservation Society has no direct connection with Sturry Parish Council, nor does it receive any support (financial or otherwise) from the Parish Council. As to why the Parish Council has not registered as an Interested Party, it is not for us to speak on behalf of the Parish Council. We have alerted the Parish Council to the PINS Examination and highlighted the necessity for it to so register if it wanted to put forward any views. It should be remembered that Broad Oak is only just over 10% of the Sturry Parish Council (measured by dwellings and registered voters) and Broad Oak is the only part of the Parish Council area to be affected in any significant way by the Applicant's proposals.</p>