



CHARTERED SURVEYORS • ESTATE & LETTING AGENTS • ACCOUNTANTS

Our Ref: MA/RW/C.5

12 July 2016

The Planning Inspectorate  
3C Eagle Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

By Email Only

Dear Sirs

Re: Application Reference EN020017  
National Grid - The Richborough Connection Project  
Our clients, J Caddick and G Chandler

**1. General**

We are instructed by the above to make a written representation on their behalf to the application submitted by National Grid for the Richborough Connection Project.

Our clients own land in Section B of the route, the Sarre Penn Valley, and as a result of a slight alteration of the route the land is now no longer directly affected by the proposal. The centre line of the proposed connection will be between 25m and 215m south of their land, as shown on the plan attached to this representation.

**2. Effect on a Small Rural Business**

Applicant's Document - 5.4.15a Socio - economic Assessment Tables

The land is mainly woodland with ponds and was purchased for the purpose of providing excellent habitat for wildlife and birds, specifically wildfowl, and it has been managed over the years to successfully provide this.

The ownership and management is carried out to specifically support a small rural business run by Mr Caddick selling game. This business operates under what is called a Hunter's Exception, meaning that he must actually be involved in the shooting of anything he sells.

Mr Caddick has invested a great deal of his time, effort and money into the development of the land to ensure it provides a sustainable source of wildfowl as the business is in effect part of his pension. The location of the land north of the Stodmarsh Nature Reserve and the prevailing wind means that wildfowl usually fly in from the south to the land for feeding and roosting. The birds' flight line will therefore be directly affected by the route of the Connection. This is likely to deter wildfowl from using the land (particularly if bird diverters are used on the power lines), seriously affecting Mr Caddick's rural business. There is also an increased risk of bird strikes, particularly in poor visibility, at night, when most wildfowl movements take place, or in fog. The noise generated by cables in certain conditions will also be a deterrent.

No account appears to have been taken of the effect the scheme will have on his business because it has not been included in the Applicant's Socio-economic Assessment Tables.

### 3. Bird Surveys, Collision Risk and Mitigation

Applicant's Documents - 5.4.9O (i) & (ii) Non Breeding Bird Survey  
Reports 2013/14 and 2014/15  
5.4.9P Bird Collision Risk

Our clients are concerned that the bird surveys carried out on behalf of National Grid do not represent Mr Caddick's personal knowledge and observations. A schedule of his shooting records for the last three years on this land is attached. The numbers are considerably higher than suggested by the surveys and include species that were apparently not observed at all in the area such as Teal and Gadwall.

It is noted in the observation times in the survey to cover dawn and dusk movements that the presence on site did not always begin before dawn and sometimes ended before dusk. Our client considers that many flights may have been missed as a result.

Another personal observation that Mr Caddick has made that supports this view is the large number of Cormorants that roost at Stodmarsh Nature Reserve and fly north to their feeding grounds as a flock at daybreak most of the year, returning throughout the day, usually individually, as and when they find sufficient food. In spite of this observation, very few of this species are recorded in the surveys, we can only find reference to six Cormorants. As these birds move out at daybreak, were they missed because observations did not always start before that time?

If the information collected does not accurately reflect bird movements in the area, then this must bring into doubt the information used to calculate the collision risk and mitigation part of the applicant's case.

It is understood that National Grid consulted with Natural England and they have been receiving guidance since December 2012. It seems that Natural England were particularly concerned about the effect of the power lines on protected species and those at Amber or above risk level in the BoCC list with the exception of Mute Swan which is Green listed but has the highest collision risk. Our clients do not see why it appears that only these birds were considered for the mitigation and collision risk which after scoping out certain species only resulted in four species being considered in any great detail. Is it not logical to assess what the most prevalent species in the area are throughout the year and carry out a collision risk and mitigation study on these? Greater consideration should also have been given to migrating birds that fly south to overwinter at Stodmarsh and beyond, as the risks to these species, unfamiliar with the area, must surely be higher. It will be seen from our clients' figures that he has recorded a high number of migratory Widgeon yet this species was not considered.

There is a proposal to use bird diverters to reduce the risk of bird collisions in the Ash Levels and Monkton Reservoir areas. It may well be suggested that this method should be used in other areas including the section near our clients' land. However, Messrs Caddick and Chandler are concerned that if this happens, birds may be diverted away from their land altogether, making it no longer fit for the purpose it is held for.

#### **4. Strategic Options, Environmental Damage and Visual Impact**

Applicants Documents - 5.4.7 Visual Impact Assessment  
5.4.7B Holford Rules and Visual Amenity  
7.4 Strategic Options Assessment  
7.8 Pylon Design Option Report

Our clients are concerned about the general environmental and visual effects the proposed scheme will have on the East Kent area as it is an area they have known and enjoyed for many years in addition to the specific area where they own land. They would much prefer an alternative route to be chosen and wonder if National Grid looked at all the alternative routes and technologies available to achieve their aim of getting electricity from Richborough to the National Grid in sufficient detail. For example, the undersea route to Graveney does not appear to have been fully explored because there were some difficulties. Could these be overcome? Also the power from project NEMO will be delivered as DC so why can't an underwater DC system be used or NEMO be diverted to Graveney? Was this even considered as the Strategic Options document only refers to an AC undersea link?

Our client understands that as part of their appraisal National Grid must consider the Holford Rules. Are they doing this by proposing a scheme that will add a much more dominant line of pylons and wires into a landscape that is generally flat and where such lines will be more visible and therefore more degrading on the environment? It would be better if they could propose a scheme that reduced the already significant amount of pylons and wires in the landscape so that the environment benefitted from their scheme rather than one that replaces an existing line of towers with a much taller one.

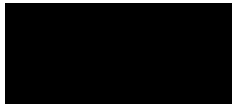
It is difficult to understand from the National Grid application if there will be standard or low height pylons on the part of the line near our clients' land. It is accepted by National Grid that low height pylons have a lesser effect on landscape and in the vicinity of our clients' land there are numerous trees, woodland and undulating land so they consider low height pylons would be preferable if the scheme goes ahead. Also low height pylons would be preferable as far as bird flight is concerned to and from their land as they will increase the chance of wildfowl gaining sufficient height to avoid them.

## 5. Summary

Our clients' concern about this scheme can be summarised as follows:-

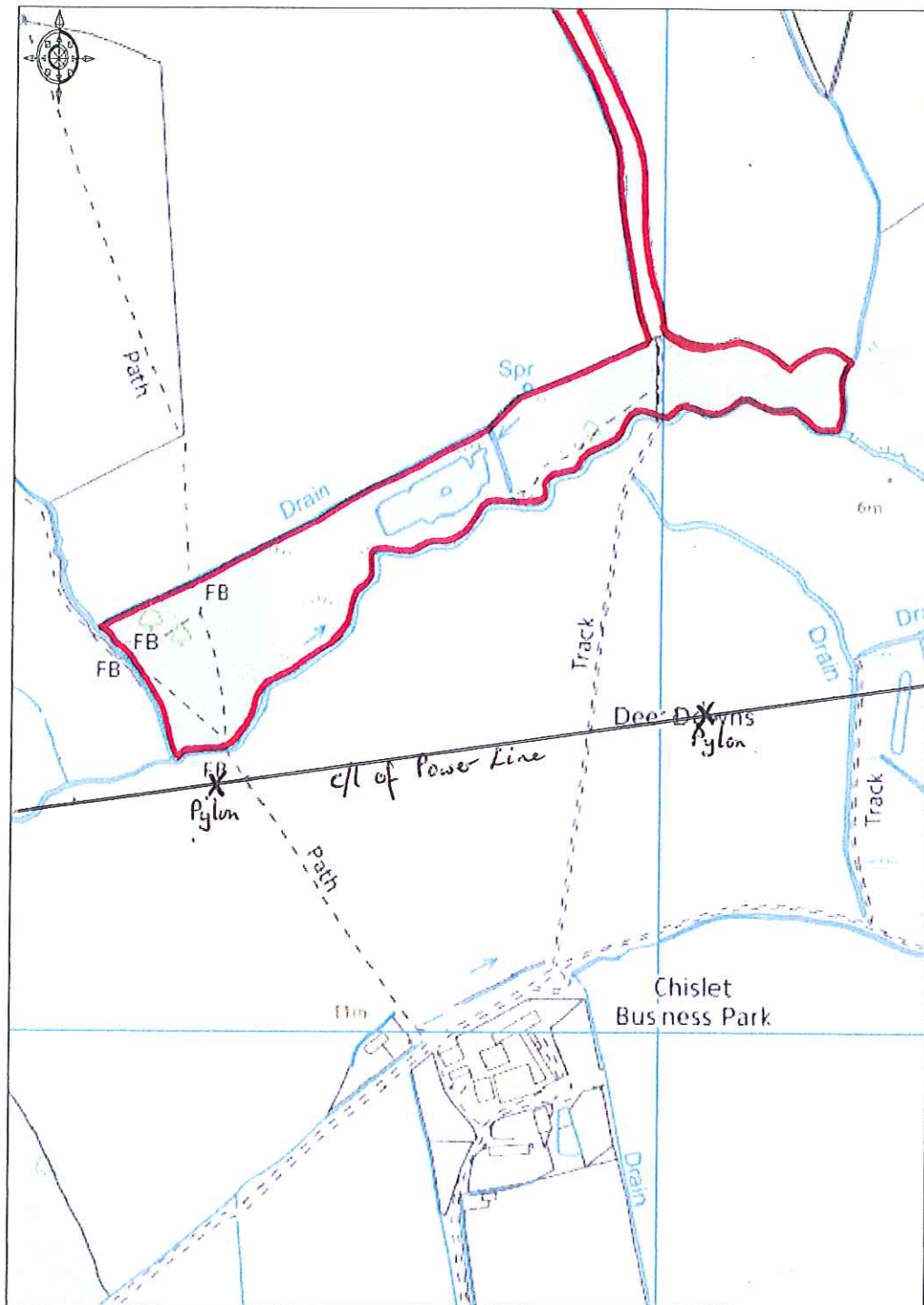
1. The effect on a small rural business
2. The effect on birds and the accuracy of the information used in the application
3. The effect of the proposal on the landscape in the wider area as well as in the locality of land they own.

Yours faithfully



M. Allen

Encl



**App Ref EN020017**

**Messrs Caddick and Chandler  
Land at Chislet,  
Canterbury, Kent.**

Approx. Scale 1:5000  
July 2016  
File Ref. MA/C5

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## National Grid Richborough Connection Project

### Response to Question 1.2.16 of The ExA First Written Questions

#### M. Allen on behalf of Mr Caddick and Mr Chandler

3 Years Shooting Records to 31st January 2016 - 1 to 3 guns in use, average 2.  
Land North of the proposed route at Hersden

Year	Date	Mallard	Widgeon	Other	Comment
2013/14	6th Sept	8	1	0	This was a very poor year as native species like Mallard did not breed well in 2013 hence the predominance of the migratory Widgeon. Also the area had significant flooding during January 2014 providing numerous other feeding and roosting grounds.
	23rd Sept	0	21	0	
	16th Oct	0	16	0	
	20th Oct	0	14	0	
	18th Nov	0	31	1 Pintail	
	15th Dec	0	37	1 Teal	
	18th Dec	1	10	0	
	16th Jan	0	9	0	
31st Jan	0	0	1 Gadwall 1 Teal		
2014/15	3rd Sept	21	0	0	
	6th Oct	26	7	3 Teal	
	10th Oct	12	1	1 Teal	
	7th Nov	4	12	0	
	2nd Dec	13	39	1 Pintail 1 Gadwall	
	9th Dec	5	8	3 Teal	
	14th Dec	0	5	0	
	1st Jan	3	23	2 Teal	
	7th Jan	4	4	2 Teal	
	31st Jan	4	10	0	
2015/16	14th Sept	24	2	0	
	28th Sept	6	11	0	
	13th Oct	4	14	0	
	24th Oct	2	13	0	
	29th Oct	8	33	0	
	22nd Nov	5	15	1 Teal	
	26th Nov	4	21	0	
	27th Dec	0	18	0	
	21st Jan	4	10	2 Gadwall	
	25th Jan	3	5	0	
	26th Jan	1	14	0	