

Response to the Examining Authority’s written questions (EAQs) dated 3 August 2015

Interested Parties Ref: NWWFC-AFP012 and NWWFC-AFP011

Mr Dewi Parry and Mrs Helen M Parry

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No.	Question to:	Question Subject Matter
0.0		Examination Management – Site Inspection in the Company of Interested Parties
0.1	Interested Parties (IPs)	In addition to unaccompanied site inspections, the Panel is considering inspecting sites and locations along the route of (and in close proximity to) the proposed development on Tuesday 22 September 2015 and/or Wednesday 23 September 2015, in the company of any interested parties who wish to attend. Do any interested parties have a view on which sites and locations are the priorities for the Panel to inspect and/or do they suggest additional locations for an unaccompanied site inspection by the Panel? Please could interested parties give a brief summary regarding why they are suggesting locations for the accompanied site inspection and any health and safety issues the Panel would need to be made aware of when visiting the site, and whether they would wish to attend if space was available.

We propose two additional site inspections; the reasons are given in relevant sections:

1. ██████████, Peniel to assess visual impact (see our separate WR on visual impact)
2. The public footpath from Peniel to Tan-y-Garth farm (see our response to 8.2 below) we suggest visiting the initial section of the path at Peniel with views overlooking the valley).

1.4	The Applicant and Interested Parties	NPS EN-1 requires applicants to consider ‘good design’ in their proposals, having regard to regulatory and other constraints, ensuring that they are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be. In so doing, the applicant should take into account both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located) as far as possible. It is suggested in the NPS that the applicant could demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Has the applicant, in the Environmental Statement (ES) documents suitably addressed ‘good design’ in the ES? If not, why not?
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1.18	The Applicant	Please could the applicant provide details of the alternative technologies that were considered in the process of selecting options, including wood pole lines and undergrounding the cable route (both partially and wholly) in a ‘like for like’ comparison table, to enable the Panel to understand the additional costs and benefits/disbenefits that would be associated with undergrounding the cable. <ol style="list-style-type: none"> (a) For each of the technology options considered in the appraisal of options process, please could the applicant provide a summary of their comparative costs for installation and maintenance (total costs and annual costs over the life of the proposed development for the whole development as well as on ‘per km’ basis); reliability; productivity; reliability and other benefits and disbenefits. (b) Please explain why the double wood pole line was chosen. (c) If the option of undergrounding the cable (for its total length) along the preferred route was not considered in the options, why not?
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Could the Applicant explain why a Single Pole structure with a buried earth conductor is not proposed? A single-pole structure would be less harmful visually and less problematic for agriculture.

4.14	The Applicant, Interested Parties and NFU Cymru	Para 10.7.2. <ol style="list-style-type: none"> (a) How will short term and potentially long term loss of field water supplies to agricultural animals be dealt with? (b) Are any private water supplies likely to be disrupted or their standards compromised either temporarily or permanently? (c) If a problem arises, how will it be addressed?
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A natural stream that passes through all but one field at ██████████ is now the only source of water for all animals on land at ██████████. The proposed development crosses the stream at its furthest upstream point and a double-pole structure with stays is planned to be installed within approx. 2m of the stream (2.2.4 Land Plans Sheet 4. box 25). The disruption and likely contamination of water associated with the construction will therefore be a very significant

concern regarding the health and safety of all the animals. The proximity of the pole structure to the stream is a concern for long term water quality.

5.3	The Applicant and IPs	If the Order were to be made, should there be a requirement within it providing for an end date for the proposed development (tied to the life of the wind farms), after which it must be removed and the land restored to its current use and quality?
5.4	Local Authorities and other Interested Parties	Does the Proposed Development's lack of clarity on decommissioning cause concern?
12.23	The Applicant, Welsh Government, LAs and IPs	Should additional requirements be included in Schedule 2 to specify:- (a) An expiry date of the development consent (if granted) tied to the life of the wind farms? (b) The time within which decommissioning of the wood pole line and restoration of its route must be undertaken after such expiry date? Mitigation in relation to European Protected Species and important habitats that would be impacted?

The lack of an end date for the development and the lack of definite assurance on full decommissioning are of serious concern. We need guarantees that the development would be removed and the land restored by a specific date that is tied to the end of life of the windfarm or an earlier cessation of windfarm electricity generation.

8.1	All Interested Parties	Do you agree with the applicant that the benefits that would be derived from undergrounding the cable as a means of reducing visual effects are likely to be outweighed by the effects of underground cables on habitats, ground cover, land management and unknown archaeology? Please provide a brief explanation.
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We strongly disagree with the Applicant. We consider that the benefits of underground cabling outweigh the effects of overground cables and structures. Farming units in Wales are relatively small and each piece of farmland is a precious resource. Putting cables underground is the only way to optimise the use of agricultural land and to preserve its integrity for the longer term. Regarding habitats, ecology and archaeology, an underground cable scheme is likely to take a different route to the currently proposed overground route. For example, underground grid cables often go alongside or underneath made roads. This minimises damage to natural habitats. It is difficult not to conclude that the primary reason for the Applicant disregarding the underground option is one of cost rather than ecological considerations. We consider that the overall benefits to our countryside, farming, tourism, health and ecology are far better realised by an underground scheme.

8.2	Denbighshire County Council (DCC) (part a) and all Interested Parties (apart from the applicant)(part b)	Paragraph 7.5.69 confirms that the location of the Viewpoints (VPs) was discussed with NRW and CCBC, and that on this basis, VPs over 5km from the route of the overhead line have not been considered. DCC were consulted on the suggested VPs but did not comment. (a) Please could DCC provide their comments on the locations of the viewpoints, including whether they consider that all relevant locations have been included. (b) Do IPs agree that the viewpoints selected by the applicant are suitable and adequate, if not, are there any other viewpoints that they would like the Panel to consider?
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We do not agree that the viewpoints selected by the Applicant are adequate. We propose an additional viewpoint at the beginning of a public footpath in Peniel for the following reason: The severity of visual impact on a popular public footpath and on residents in Peniel has not been adequately addressed by the Applicant in their visual impact assessment.

For location please refer to: 2.4.4 Access and Rights of Way Plan Sheet 4. Footpath 21.

Describing the proposed development route (6.7 ES Chapter 7 – Landscape and Visual) the Applicant states “..it would be visible to the north and north east, particularly where it would appear in foreground views and from the edge of settlement at Peniel, from the B4501 and the local footpath network. The Proposed Development becomes less visible in the wider landscape as it passes through grazing land adjacent to wooded copses, then through a low and localised stream valley, before rising up again as it crosses the B4501..”

The applicant does not adequately describe the effect of the development on the visual amenity value of 1km of footpath from Peniel to Tan y Garth farm.

The visual impact is significantly worsened because the proposed route descends into and crosses a valley, before then rising the other side. The footpath traverses the centre of the valley and would pass directly underneath the overhead lines. The proposed development would be a very dominant visual feature to footpath users at all points on the footpath over the 1 km distance. Currently there are no existing electric or telephone cables or artificial structures to mar the experience of this unspoilt region. It is a uniquely beautiful and peaceful route that passes ancient woodland and through fields, a wholly natural environment that is enjoyed by tourists, local residents, ramblers and youth groups.

We would like the panel to make a site inspection and consider an additional viewpoint at the beginning of the footpath at Peniel overlooking the valley and the proposed route.

10.1	Interested Parties	Paragraph 11.8.13 of the Socio-economic and tourism chapter of the ES (Chapter 11) states that the proposed development is likely to have a negligible/low adverse effect on the area's tourism economy and in terms of overall significance (paragraph 11.8.15), the development is unlikely to have any significant adverse effects on the overall tourism economy during eth construction, operation and decommissioning phase. Do IPs agree with this statement? If not, why not?
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In our view the Applicant has not demonstrated that the development would have a 'negligible/low adverse effect on the area's tourism economy' for the following reasons:

Paragraph 11.6.5 of the Socio-Economic and Tourism chapter of the ES quotes the text used to communicate with the respondents for the survey. We note that it conveniently avoids any reference to 'pylons' or even the size of the double-pole structures or how they may appear in the landscape. It simply refers to a 132kv line.

There is no record of any further information given to the respondents to enable them to give an informed opinion on visual impact and we don't know how many, if any, of the respondents were already familiar with the proposed scheme as that question was not asked. Furthermore, paragraph 11.6.4 states "*Some felt they did not have time to provide a full response*".

The final sample size of only 15 respondents in total (paragraph 11.6.7) combined with factors already mentioned is not a sufficiently sound basis for the Applicant's claim of 'negligible/low adverse effect on the area's tourism economy'.