

North Wales Wind Farms Connection

Deadline - 17 September 2015

Deadline 2

Interested Parties Ref: **NWWFC-AFP012 and NWWFC-AFP011**

Mr Dewi Parry and Mrs Helen M Parry

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Please accept our submission comprising:

1. Visual impact for ██████████
2. Plan diagram showing estimated views from ██████████ – Fig.1
3. Profile diagram showing estimated views from ██████████ – Fig.2
4. Comments on Undergrounding
5. Impact on Land Management and Value

Visual Impact for ██████████

Our comments on the Applicant's response to our RR No. 90.

In order to help explain our case as clearly as possible we also include two diagrams on pages 3 and 4, interpreting as best we can the lines of sight and magnitude of visual effect. We have taken the applicant's plans and profile drawings as a basis.

Firstly here is the relevant section of the Applicant's response:

SP Manweb Responses to RRs (page 167)

(vi) Disagreement on conclusions of the LVIA assessment (RR No. 90)

16.11.55 Appendix 7.1 of the ES (DCO document reference 6.20) presents the residential visual amenity assessment undertaken for the Proposed Development. A summary is presented in Section 7.7 of the ES (DCO document reference number 6.7). The assessment includes an assessment of effects on the group of properties referred to in relevant representation no. 9 (Ref 49 – ██████████). The assessment is undertaken at Table 3.1 of Appendix 7.1 of the ES (DCO document reference 6.20).

16.11.56 The visual assessment concluded that there would be a minor magnitude of change which, when combined with the high sensitivity residential receptors, would give lead to minor effect which is not considered significant.

16.11.57 The residential visual amenity assessment notes that primary views are not orientated towards the Proposed Development, although ██████████ may experience winter views (depending on tree cover) of the Proposed Development as it passes from the ridge down the valley sides towards Hendy. ██████████ (the bungalow) would experience views of the Proposed Development to the rear (six windows) and side. The proposed 132kV Overhead Line would briefly skyline as it reached the rising land adjacent to the B4501.

16.11.58 SP Manweb considers that the effects have been accurately assessed and are proportionate to the type of development proposed and to the type of landscape in which it is located.

Table 2.1: Summary of Residential Visual Amenity Effects on Properties

Ref	Property/ Group Name	Individual or Group	Sensitivity	Magnitude	Significance of Visual Effect
*49	[REDACTED]	G	High	Small	Minor (not significant)

We still disagree with the Applicant’s visual impact assessment conclusions.

Regarding ‘Magnitude’ and ‘Significance’:

- The proposed development would have an immediate and very significant visual impact for viewers inside and outside [REDACTED]. The overhead line and structures would dominate the landscape throughout the year and the visual impact would remain unchanged for many decades.
- Western views of the landscape would suffer a strikingly significant change in character from its present nature due to the size of structures, their proximity and their presence on the skyline.
- Southern views of the route are across a wider angle of vision. The effects would be present throughout the year but especially deleterious through winter when trees are not in leaf.
- Please also note that the route between pylons 63 and 67 is currently free of any artificial structures and crosses a public footpath. The proposed development would introduce ugly artificial structures into an unspoilt natural environment. Our response to ExA 1stQs 8.2 (Sept 1) on Viewpoints sets out reasons why the Examining Authority may wish to give particular attention to this area and the public footpath amenity.
- The cumulative effect of the proposed development with existing wirescape to the west was discussed with the Applicant. Their initial suggestion to mitigate by undergrounding existing 11kV lines has since been withdrawn; hence the cumulative impact would remain unchanged for decades.
- The proposed development is to all intents and purposes a permanent structure for residents and landowners as no assurances of maximum lifetime has been given by the Applicant. No appreciable reduction in the visual impact would occur over time as the pole structures will continue to tower above trees.

We believe that a reappraisal of Magnitude and the resulting Significance is warranted.

The Applicant still maintains that ‘*primary views are not orientated towards the Proposed Development*’ (16.11.57). This is not the case. As we have previously stated we have primary views from the living areas in [REDACTED] towards the route that also include two Skylines (See Figs1, 2). Windows in Kitchen, Dining Room, Living Room and one Bedroom will have uninterrupted direct views.

16.11.57. “[REDACTED] may experience winter views... as it passes from the ridge down the valley sides” We still disagree with the Applicant’s statement. [REDACTED] will (not ‘may’) experience both summer and winter views of the route as it passes from the ridge down the valley. Furthermore it will almost certainly be a skyline view on the ridge. We estimate from section drawings that pylons 54 and 55 are likely to skyline to differing extents.

- In winter, approx. 440m of this section comprising 7 pylons (pylons 54 to 60) are likely to be visible.
- In summer, approx. 320m and at least 5 of the pylons are likely to be visible.

The Applicant’s statement in no way reflects this and is wrong to say “*the effects have been accurately assessed*” (16.11.58)

16.11.57. “*The proposed 132kV Overhead Line would briefly skyline as it reached the rising land adjacent to the B4501*” We restate that there are two separate skyline occurrences, one to the south and one to the west as directly viewed from [REDACTED] main room windows. The nearest skylined pylon (pylon 69) being 185m away from viewers at [REDACTED] windows (See Fig1, Fig 2). An existing

mature tree may partly form a backdrop to pylon 69, but in our estimation it would not noticeably reduce skyline impact due to low leaf density and pylon size.

The words 'briefly skyline' are not congruent with the likely visual effect. At least four pylons are likely to skyline on the west view alone (pylons 68, 69, 70, 71). Pylon 72 may also be partly visible, but this is uncertain. Approx 200m of the overhead line extends across the west view.

Undergrounding these sections of the route would be an acceptable solution and would address all the objections we have raised.

Fig.1
Plan drawing of estimated views from [redacted]

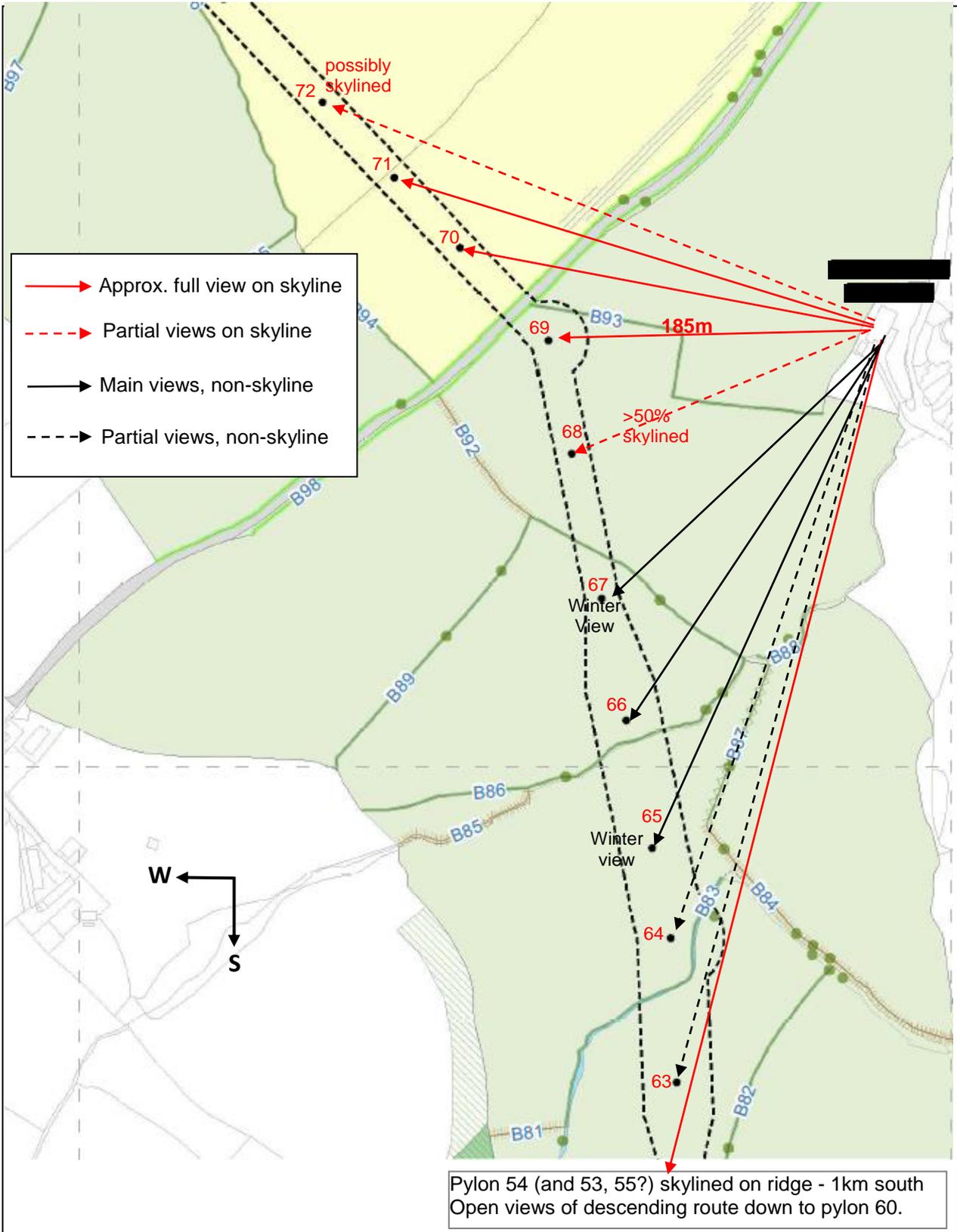
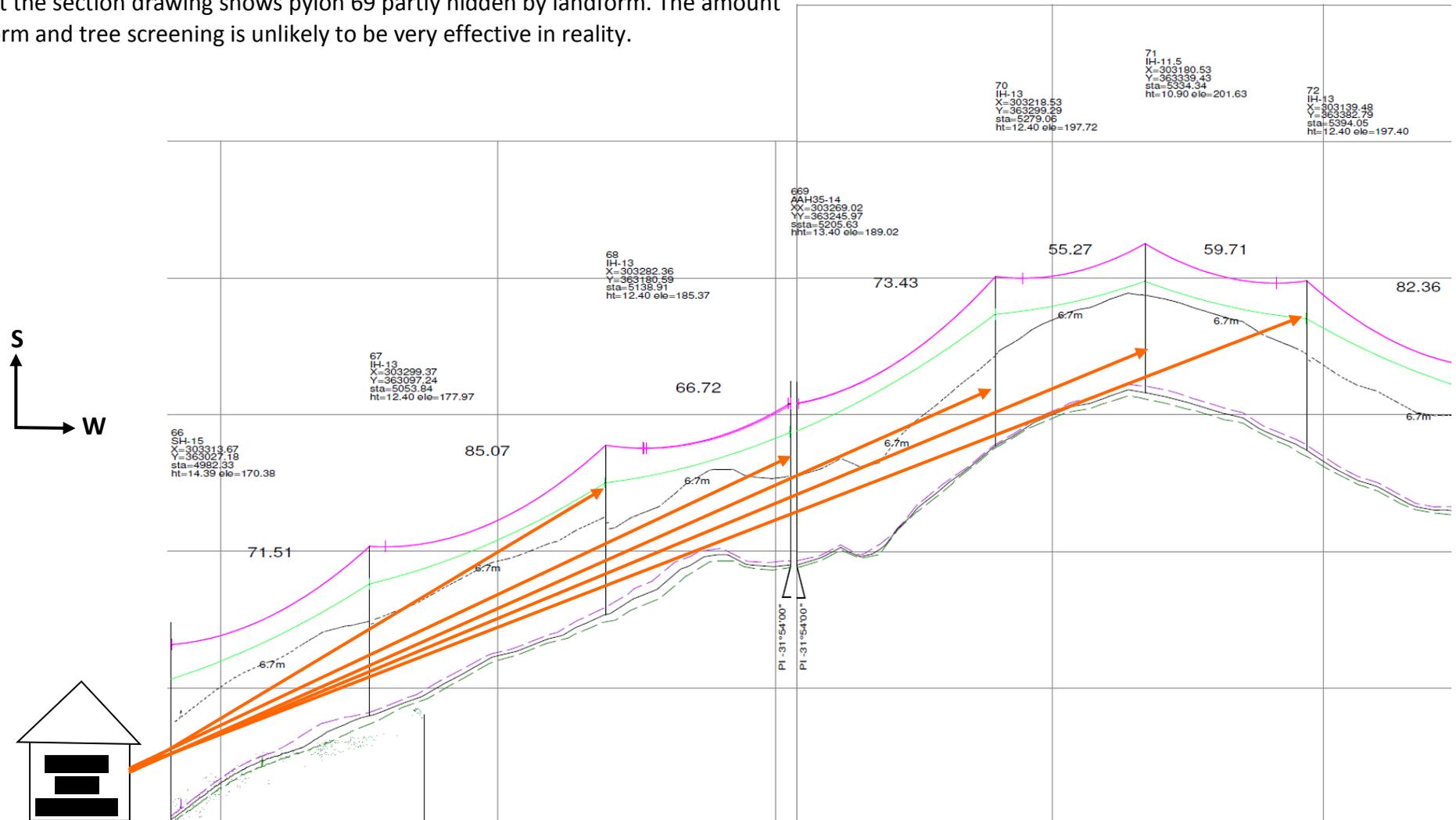


Fig. 2

Profile Drawing of Estimated Views from [REDACTED].

→ Skyline views of Pylons 68, 69, 70, 71, possibly 72.

Pylons 69, 70 and 71 would likely be visible almost in their entirety on the skyline.
 Pylon 68 would at least 50% skyline. Top part of Pylon 72 may or may not be visible.
 Note that the section drawing shows pylon 69 partly hidden by landform. The amount of landform and tree screening is unlikely to be very effective in reality.



Undergrounding

EN-1 guideline 3.7.10 states:

*“...in most cases, there will be more than one technological approach by which it is possible to make such a connection or reinforce the network (for example, by overhead line or underground cable) and the **costs and benefits of these alternatives should be properly considered as set out in EN-5 (in particular section 2.8) before any overhead line proposal is consented.**”*

EN-5 section 2.8.4

“wherever the nature or proposed route of an overhead line proposal makes it likely that its visual impact will be particularly significant, the applicant should have given appropriate consideration to the potential costs and benefits of other feasible means of connection or reinforcement, including underground and sub-sea cables where appropriate. The ES should set out details of how consideration has been given to undergrounding or sub-sea cables as a way of mitigating such impacts, including, where these have not been adopted on grounds of additional cost, how the costs of mitigation have been calculated.”

We don't feel that the applicant has followed the EN-1 and EN-5 guidelines to give *proper* consideration of costs and benefits of undergrounding, either for the complete end-to-end connection or for individual mitigation scenarios along the route.

The 7.3 Strategic Options Report suggests a possible cost of £60m (inc. additional substation infrastructure) for a 24km underground connection, i.e. £2.5m /km.

A more detailed June 2013 report by Balfour Beatty on undergrounding costs, commissioned by Western Power for the Brechfa Forest project gives an approximate cost of £986,000 /km (<http://www.westernpower.co.uk/docs/About-us/Our-business/Our-network/Current-WPD-Planning/Library/Underground-Cable-Costs-Report.aspx>).

It is difficult to reconcile a 2.5x cost difference between the two projects especially given the similarities in capacity requirements, landscape topography and distances. But as the Applicant gives few details of their calculations or what assumptions were made it further underlines our concern about the adequacy of the applicant's response on undergrounding. Given the substantial impact of the proposed overhead connection we feel it is reasonable to request an independent survey be conducted to enable proper evaluation and comparison.

We would also make the observation that in the last few years there have been significant technical improvements in the design and construction of underground cables. Such a solution today would be more feasible technically and financially than in the past. Undergrounding is already implemented as the preferred option in many other European countries and the National Grid is due to decommission pylons across National Parks/AONB regions in the UK.

In conclusion, regarding the applicant's Response to RRs (page 145)

16.3.15 EN-5 makes it clear that undergrounding should only be considered as a mitigation measure where there are "serious concerns" about the potential adverse landscape and visual effects of a proposed overhead line.

We hope to have persuaded the examining authority that there ARE *“serious concerns’ about the potential adverse landscape and visual effects”* of the proposed overhead line.

Land Use and Value

Of the four pylon structures that are proposed across our land, two involve stays due to change in direction of the line. This represents a substantial loss of valuable workable land. Manoeuvring agricultural machinery around structures with stays carries safety risks and can be difficult. Access needed by hedgecutting machinery has also been identified as a major problem at these particular locations.

All four structures incur a loss of workable land between each pole pair and immediately surrounding them, however the use of stays results in even greater loss under the span of the stays. We don't think that the double-pole structure chosen is an appropriate design. There is just too much unnecessary waste in an area where good quality workable agricultural land is a precious commodity.

The use of carefully maintained hedges to delineate the relatively small fields is practiced more widely in this region than in many other parts of the country. The double-pole structures proposed are incompatible with the need for clear access to properly maintain hedges. The two pylons (64 and 69) are prime examples of this, where the options for relocation are extremely limited to non-existent. According to the applicant, Pylon 64 and its stays cannot be relocated to a suitable position and Pylon 69 is sited in a corner with two hedgerows and gate to which access is required by agricultural machinery.

The proposed development would have a very significant detrimental effect not only on the value of the land but also on the value of the residential property due to the severity of visual impact and destruction of views as previously described. We are concerned that no attempt has been made to offer reasonable compensation or to offer any effective mitigation. An undergrounded solution would be an effective mitigation measure and would alleviate all the concerns.