



The North Wales Wind Farms Connection Project

SP Manweb's Responses to Written Representations

Application Reference: EN020014

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The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

The North Wales Wind Farms Connection Project

SP Manweb's Response to Written Representations

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Respondent	Written Representation	SP Manweb Response
Natural Resources Wales	The purpose of the Natural Resources Body for Wales (NRW) is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. In this context sustainably means with a view to benefitting and in a manner designed to benefit the people, environment and economy of Wales now and in the future. Our functions are set out in the Natural Resources Body for Wales (Functions) Order 2013	No response required
	This letter contains:- <ul style="list-style-type: none"> • A summary of our written representations • Our full written representations • An Appendix containing NRW's answers to the • Examining Authority's written questions 	No response required
3.4	<p>Flood Matters – We state that the contents of the Flood Consequences Assessment are, in our opinion, generally commensurate to the scale and nature of the development proposals but we would welcome further consultation regarding the design measures for a pole assembly within a flood zone. We say that we require clarity as to the detailed design and method of installation at main river crossings before these can be consented</p> <p>Flood Defence Consent - The applicant has indicated that it may wish to disapply such consents under s150. NRW does not consider at this stage that the applicant has provided sufficient information to support such a request.</p>	<p>SP Manweb welcomes NRW's confirmation that it considers the Flood Consequences Assessment is generally commensurate to the scale and nature of the Proposed Development.</p> <p>SP Manweb has responded to NRW's comments regarding flood matters in its Response to Relevant Representations Document (SPM NWWFC RR Document 1) which was submitted as part of its Deadline 1 submission. SP Manweb considers the responses raise here are the same as in NRW's relevant representations submission.</p> <p>SP Manweb is continuing to liaise with NRW regarding flood matters and is entering into a Statement of Common Ground with them, which will include a consideration of the detailed design and method of installation at main river crossings. SP Manweb is confident that such wording can be agreed within this document prior to the close of the Examination.</p>
3.5	<p>European Protected Sites – We reiterate our response to the No Significant Effects Report, saying that in our view significant effects on European sites (either alone or in combination with effects from other plans or projects of which we are aware) are unlikely to occur as a result of granting a development consent order for the scheme.</p> <p>We are aware that the Welsh Government has raised the issue of potential impact on White-fronted Geese that are features of the Dyfi Estuary Special Protection Area (SPA). As stated in Section 3.5.1 in relation to all European sites, we consider significant effects on this feature resulting from the proposed development to be unlikely. .</p>	SP Manweb welcomes NRW's confirmation that significant effects on European sites (either alone or in combination) are unlikely.
3.6	Sites of Special Scientific Interest (SSSI) - granting the application is unlikely to damage the features of any SSSI.	SP Manweb welcomes NRW's confirmation on this point.
3.7	<p>Landscape and Visual Amenity - In view of the scale of the proposed development, we believe that there will be no effect upon Statutory Landscape Designations. Elements which contribute to the study area's landscape character resource are of regional/county to local value and we believe that the landscape specialists of planning authorities are better placed to consider effects at these scales.</p> <p>We consider the methods used in the Landscape and Visual Impact Assessment to be appropriate, compliant with current guidance and we concur with the assessment of residual effects.</p>	<p>SP Manweb welcomes NRW's confirmation that:</p> <ol style="list-style-type: none"> 1. there will be no effect upon Statutory Landscape Designations; 2. the methods used in the Landscape and Visual Impact Assessment were appropriate and compliant with current guidance and that they concur with the assessment of residual effects. .

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3.8	<p>European and Nationally Protected Species - the content of Environmental Statement Chapter 6 is sufficient to inform decisions concerning methods and procedures needed to protect nationally and internationally protected species. Licences will probably be needed for compliance with legislation. Method Statements for some species should clarify how decisions regarding licence application are to be made.</p> <p>...we consider that there should be a Development Consent Order requirement for the CEMP to be subject to NRW for approval.</p>	<p>SP Manweb welcomes NRW's confirmation that the Environmental Statement is sufficient to inform decisions concerning methods and procedures needed to protect nationally and internationally protected species.</p> <p>SP Manweb has recently submitted a draft dormouse licence and method statement to NRW for comment. SP Manweb is continuing to liaise with NRW regarding these issues and is confident that agreement can be reached in a Statement of Common Ground prior to the conclusion of the examination.</p> <p>Regarding the Construction Environment Management Plan (CEMP), Requirement 13 of Schedule 2 to the draft DCO (submitted at Deadline 2) has been amended requiring SP Manweb to consult with NRW on the CEMP (which also includes the ecological management plan and hedgerow management plan) prior to submission to the relevant planning authority. When the final form CEMP (and ecological management plan and hedgerow management plan) is submitted to the relevant planning authority, SP Manweb must also submit it to NRW pursuant to Schedule 10 of the draft DCO, as Requirement 13 has been amended to make it express on the face of the Requirement that NRW will be consulted on it during the formal approval process by the relevant planning authority.</p>
3.9	<p>Contaminated Land - risks from land contamination are expected to be low but it is not clear to us what has been done to confirm that contaminated land is not present within the order boundary. The applicant should therefore demonstrate that appropriate measures have been taken.</p>	<p>Please refer to SP Manweb's response to FWQ 4.2 regarding contaminated land (DCO Document Reference SPM NWWFC ExA1). SP Manweb does not consider there is a high potential to discover contaminated land during construction of the Proposed Development. However, to ensure that the possibility is properly controlled if discovered, SP Manweb has proposed a requirement to Schedule 2 of the draft DCO (DCO document reference 3.1). This requirement ensures that any contaminated identified during the construction process is properly controlled through investigation and risk assessment. When the investigation and risk assessment is submitted to the relevant planning authority, SP Manweb must also submit it to NRW pursuant to Schedule 10 of the draft DCO, as Requirement 13 has been amended to make it express on the face of the Requirement that NRW will be consulted on it during the formal approval process by the relevant planning authority.</p>
3.10	<p>Ground Water - we are satisfied that the risks to groundwater from the proposed scheme are likely to be low if the measures included in the Outline Construction Environmental Management Plan (CEMP) are followed.</p>	<p>SP Manweb welcomes NRW's confirmation on this point.</p>
3.11	<p>Construction Environmental Management Plan (CEMP) – The CEMP and its Appendices should be subject to NRW approval.</p>	<p>Requirement 13 of Schedule 2 to the draft DCO (submitted at Deadline 2) has been amended requiring SP Manweb to consult with NRW on the CEMP (which also includes the ecological management plan and hedgerow management plan) prior to submission to the relevant planning authority. When the final form CEMP (and ecological management plan and hedgerow management plan) is submitted to the relevant planning authority, SP Manweb must also submit it to NRW pursuant to Schedule 10 of the draft DCO, as Requirement 13 has been amended to make it express on the face of the Requirement that NRW will be consulted on it during the formal approval process by the relevant planning authority.</p>
3.12	<p>Land Interest - NRW's land agency function relates to land management issues and is separate to and independent of NRW's role as Statutory and Interested party for the purpose of the DCO application.</p>	<p>No response required</p>
3.13	<p>Development Consent Order (DCO) - the applicant is seeking the disapplication of certain legislative provisions that apply to flood defence. NRW is currently assessing</p>	<p>SP Manweb refers to its response to Question 12.7 of the ExA's First Written Questions (DCO Document Reference SPM NWWFC ExA1). SP Manweb is seeking, pursuant to section 150 of the Planning Act 2008, the disapplication of a number of provisions under</p>

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	the implications of such a disapplication.	<p>the Water Resources Act 1991 and the Land Drainage Act 1991 in relation to the construction of works carried out for the purpose of, or in connection with, the construction or maintenance of the Proposed Development.</p> <p>SP Manweb is not seeking to engage section 150 as a "blanket release" as suggested by NRW, rather protective provisions for the benefit of NRW will ensure that NRW retains control in respect of works in, over or under a watercourse which is part of a main river. These protective provisions are currently under discussion with NRW and it is hoped that once they are in agreed form, NRW will agree to Article 32 being included in the DCO.</p>
3.1	<p>The advice and comments contained in this Written Representation are provided as a Statutory Party under the Planning Act 2008 and Infrastructure Planning (Interested Parties) Regulations 2010 (as amended) and 'interested party' under s102(1) of the Planning Act 2008 (as amended). Further, NRW is consulted:</p> <p>In relation to proposals in Wales that have the potential to impact on species protected by Schedules II and IV of the Conservation of Habitats and Species Regulations 2010 (as amended)</p> <ul style="list-style-type: none"> • In respect of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (as amended) • In respect of proposals likely to damage any of the flora and fauna or geological or physiographical features for which a Site of Special Scientific Interest (SSSI) has been notified pursuant to the Wildlife and Countryside Act 1981. 	No response required
3.2	NRW provided a summary of its principle concerns in its Relevant Representations, submitted to the Planning Inspectorate on 5th of June 2015, and will continue to provide advice to the Applicant with the aim of reaching positions of common ground wherever possible during the examination. We will also continue to advise on the content of the Construction Environmental Management Plan and its constituent plans, and any other relevant Plans and documents under the draft DCO.	SP Manweb thanks NRW for its comments. SP Manweb is liaising with NRW in order to agree a Statement of Common Ground prior to the close of the Examination. SP Manweb will continue to liaise with NRW in relation to the Construction Environmental Management Plan and any other relevant plans and documents in relation to the draft DCO.
3.3	Our written representation is based solely on the information provided within the application documents. Any changes in our position will be reflected in further representations and Statement of Common Ground (SoCG) (wherever possible). These written representations indicate the principal submissions that we currently wish to make. NRW will develop these points further as is appropriate during the examination process; however, we reserve the right to make further submissions during the course of the examination.	No response required
Tir Mostyn Wind and Foel Goch Limited	<p>Further to you letter of 04 August 2015 addresses to Tir Mostyn Wind and Foel Goch Limited (TMFGL) your ref EN020014 (our allocated re NWWFC – AFP081). We are the owner of the Tir Mostyn and Foel Goch wind farm, and wish to make the following observation with regard to the referenced MANWEB application.</p> <p>Document ref 2.2.0 Overall Location Plan and Mater Key Plan for Lands Plans' illustrates that a 132kV Overhead Electricity Line (OHL) crossing over a public highway at approximate National Grid Reference 3.0230, 359197. Our concern relate to ensuring that adequate clearance is maintained beneath the conductors of the OHL sufficient to facilitate the uninterrupted passage of (inter alia) vehicles, plant, machinery</p>	<p><u>Design and Protection of the Existing Wind Farm</u></p> <p>Existing planning and development constraints have been taken into consideration when designing the Proposed Development and positioning the 132kV Overhead Line.</p> <p>Clearances are designed to national standards (Technical Specification 43-8, Issue 3, 2004) to allow vehicle access. Clearances to Grounds and Roads is 6.7m. In the unusual event of an abnormal load requiring passage at National Grid Reference 3.0230, 359197 and where safety clearances may be compromised, a circuit outage and temporary line lowering could be arranged if appropriate and necessary, in accordance with Technical Specification 43-8, which defines clearances for high loads under Department of Transport</p>

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	<p>and turbine components along that public highway as required for the ongoing operation and maintenance (and the subsequent decommissioning) of Tir Mostyn and Foel Goch Wind Farm.</p> <p>In the event that such assurance re the provision of uninterrupted access to Tir Gwynt cannot be given, the consideration might be given by the applicant to installing that part of the 132kV Overhead Electricity conduit as an underground cable as opposed to an overhead line.</p> <p>In addition it should be noted that part of the route for the OHL in the immediate vicinity of the above road crossing point crosses over, in or under land which TMFGL have interest. We would therefore appreciate your continued inclusion of TMFGL in future correspondence on this particular matter as well as the wider issues relating to the overall application itself. It is our intent to send you a representation along to the site visits as currently scheduled for 22 September in the event that you wish to seek any further clarification on the matters raised.</p>	<p>designated routes. Each case would be dealt with on a case by case basis following a written request from the developer stating the high load details. SP Manweb would therefore respond to any requirement for abnormal load movement around the public highway and underneath any of the overhead powerlines for which it has responsibility in this way. This is no different to the current position across SP Manweb's network, and indeed the network of any DNO.</p> <p>SP Manweb has explained previously in its response to FWQ 8.1 (DCO Document Reference SPM NWWFC ExA1) and in its response to Denbighshire County Council's Local Impact Report as to why undergrounding is not considered necessary along any part of the 132kV Overhead Line. As there are already statutory procedures and national standards in place to allow abnormal load vehicle access along public highway and underneath overhead lines, it is not considered necessary to undertake any further mitigation.</p> <p>SP Manweb will continue on-going discussions with Tir Mostyn Wind and Foel Goch Limited and would be pleased to discuss the written representations response with them on 22nd September.</p>
<p>Lois Williams</p>	<p>As the owner of Groesffordd Farm, Marli, Abergele LL22 9DR situated very close to the Terminal Pole I object to the proposal on the following grounds. My registration Number is 10031292.</p> <p>The installation of the 17 kilometre pylon line will cause irreparable physical and visual damage to our landscape across the entirety of its route. SP Manweb minimises the extent of this harm by employing assessment criteria which downplay the negative side-effects this development will have on our landscape and our enjoyment of it. Undergrounding is dismissed on cost grounds but the cost differential across the lifetime connection is much less than initially maintained. As there are plans to bury the existing 33 kV line, undergrounding of this new line must be a feasible realistic option.</p> <p>In terms of local community and local impact here I speak in the main of Cefn Meiriadog and Groesffordd Marli where the long term environmental and visual impact will forever change its character. We need to be environmentally responsible and should be preserving our cultural heritage. Pylons are being constructed close to some of the oldest and finest houses in Wales. Berain, a 2* listed building is a medieval gentry house, home of Katherine (Tudor) of Berain, The Mother of Wales and Plas Newydd, a 2* listed building is one of the finest and best preserved examples of Elizabethan regional gentry houses. Both will look out at pylons.</p> <p>Pylons will be crossing the Elwy Valley, a place of enormous beauty and of archaeological, environmental and historical significance. It is a landscape which has inspired poets, writers and artists including Gerard Manley Hopkins. The Elwy Valley is named as one of the Top 10 Poet Walks in the UK . These sites were nominated as being a 'walk in the footsteps of some of Britain's greatest poets and explore(ing) the landscape that inspired their famous verses'. The Elwy Valley, Denbighshire is the only site nominated in Wales, it is small, remarkably contained and a joy to visit.</p> <p>The Cefn Meiriadog Ridge, 'The Bryn' as it is known to locals is visible for miles, it can be seen from Bodelwyddan Hospital, the Marble Church, Rhuddlan Castle, Cwm Mountain, Rhyl, Dyserth and many other places including many major roads. The</p>	<p><u>Landscape and Visual Impact and cultural heritage</u></p> <p>The landscape and visual assessment has been carried out in accordance with current guidance in GLVIA3 and relevant policy, in particular National Policy Statement EN-1 (NPS EN-1) and National Policy Statement EN-5 (NPs EN-5), as explained in Section 16.11(iv) of SP Manweb's Responses to Relevant Representations (DCO Document Reference SPM NWWFC RR Document 1). It is also noted that NRW in its Written Representation has confirmed that the methods used in the Landscape and Visual Impact Assessment are appropriate and compliant with current guidance and that they concur with the assessment of residual effects.</p> <p>Impacts upon Berain and Plas Newydd</p> <p>Chapter 8 of the ES 'Historic Environment' has identified both the properties referred to, Berain and Plas Newydd, and has assessed the potential effects arising from the Proposed Development and the significance of those effects.</p> <p>The ES notes that</p> <p><i>"Of the heritage assets identified within the Study Area, by far the majority are post-medieval in date.Many of the farmhouses in the Study Area are Grade II listed structures, listing also extending in some cases to ancillary agricultural buildings, such as barns, granaries, cow sheds, pigsties and cart sheds." (para 8.5.23)</i></p> <p><i>"Of particular note is the sixteenth-century home of Katheryn of Berain." (para 8.5.24).</i></p> <p>It goes on:</p> <p><i>"Berain and its agricultural range (LB 163, 19855, 19856, 19857) occupy an area of flat ground set within a small plateau on the south side of the Elwy valley, with rising ground to the west which would be crossed by the 132 kV Overhead Line. The buildings have historical significance. Berain is an important fifteenth-century gentry house and the birthplace of Katheryn of Berain. Potential near-distance views of the 132 kV Overhead Line would be filtered by intervening trees to the south west, whilst middle-</i></p>

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	<p>pylons will break the skyline as they come over the ridge to the terminal pole. This permanent eyesore should not be allowed to happen to such a highly visible landmark which is described as 'part of the area's fascination'.</p> <p>The pylons will also be highly visible from Mynydd y Gaer, the pre Roman Hill Fort near LLannefydd where there are spectacular views of Snowdonia, the north Wales coast and the Clwydian Range. Many tourists, locals, hillwalkers, cyclists visit this site and enjoy it and perceive it to be a special place.</p> <p>SP Manweb refer to the 'track' at Groesffordd Marli, where the terminal pole is located, as if it has no local significance. History shows otherwise; this is an old road shown on the tithe map of 1846. The entrance they plan to use lies to the right of my home at Groesffordd Farm. This point is the site of the original crossroads/groesffordd that gives this settlement its name. The barn opposite at Groesffordd Farm is the site of a tithe barn. The 'old lane' is of local, regional and national historic interest and southbound from this point climbs over the ridge and down to the right of Plas Hafod house. Beyond there it drops down to the Elwy Valley. It then climbs up the other side of the valley between Bodysgaw and Mofoniog where it follows the present road to LLannefydd and eventually leads to Bryn Rhyd yr Arian. On the northside from the point at Groesffordd Marli crossroads, the lane passes through Groesffordd Farm and winds through Faenol Propor, Tyddyn Isaf and Pengwern eventually leading to the bank of the river at Rhuddlan where there was once a port. This port was the most important in Wales serving the Vale of Clwyd.</p> <p>This particular stretch of the 'old lane' that SP Manweb are planning to use is the most preserved section of that old historic route. It is narrow, has high fern-lined banks and high hedges. It is natural and unspoilt. It cannot accommodate heavy, wide vehicles and machinery. Its character and history will be destroyed. It is enjoyed by so many people and is a very popular route with walkers, dog walkers and horse riders and at its peak the view opens out over the Cefn Meiriadog Ridge to give spectacular panoramas in all directions: towards LLannefydd and Cefn Berain in one direction and towards the Vale of Clwyd, Rhyl and the sea in the other. My major concern is that its importance and value to the community has been overlooked by SP Manweb who see it simply as a track, a means of access to erect the terminal pole and then an easy access route to carry out maintenance work. They also intend to take up a substantial stretch of hedge to enable this work. This cannot be allowed to happen.</p> <p>In terms of visual intrusion created by energy generation and its infrastructure we have suffered greatly in Cefn Meiriadog and Groesffordd Marli. SP Manweb ignore this. No mention is made of the cumulative effect of the terminal pole and the other pylons coming over the north side of the Cefn Meiriadog Ridge. No mention is made of the National Grid and RWE substations serving the Gwynt y Mor offshore wind farm or the Dong Energy substation currently under construction collecting power for the Burbo Bank Extension. These enormous and highly visible industrial developments with their power lines and pylons are totally out of proportion with the scale of the settlement, yet they are all in Cefn Meiriadog. In addition we already have a 400kV pylon line, a 33kV line with steel pylons, a Business Park which has taken over twenty years of planting to shield and a much contested crematorium under construction. Glascoed Road is fast becoming a major eyesore. Having pylons coming over the ridge compounds the situation even more and makes living here intolerable.</p>	<p><i>distance views to the west and north west are either open and potentially sky-lined or blocked locally by large, modern steel agricultural barns. The magnitude of indirect (visual) effect for Berain is likely to be Minor, but taking a conservative approach, it has been assessed as Moderate, due to the close proximity to the Proposed Development. As a grade II* listed building, its value is towards the upper end of High. Taking both of these into consideration, the overall effect on the group of listed buildings at Berain is moderate/large, and therefore potentially Significant." (8.7.43)</i></p> <p>The potential impact upon Berain has been fully assessed and responded to in response to CCBC's Written Representations and LiR (see SP Manweb's response to paragraph 6.3.3 of CCBC's LiR).</p> <p>In relation to National Policy Statement EN-5 (Electricity Networks), there is no specific guidance in NPS EN-5 on cultural heritage and nor is there any indication that undergrounding should be considered as a result of cultural heritage impacts. National Policy Statement EN-1 (Overarching Energy) provides guidance on designated sites. Paragraph 5.8.14 states that there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater should be the presumption in favour of its conservation. Paragraph 5.8.14 goes on to say that "<i>Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including...grade I and II* listed buildings.... should be wholly exceptional.</i>"</p> <p>It should be noted that the Inspector at paragraph 441 of his report on the Mid-Wales Inquiry (published 7 September 2015), states that "<i>[I]n the light of EN-1 guidance it is important to establish which, if any, of the above effects would result in substantial harm. This is a very high level of harm and I accept that it must lie at the upper end of the spectrum of major adverse effects.</i>" The moderate effects at Berain do not, therefore, equate to "substantial harm".</p> <p>With respect to Plas Newydd the assessment notes:</p> <p><i>"Plas Newydd is listed as an exceptionally well-preserved example of an Elizabethan regional gentry house. It occupies a high point on the Cefn Meiriadog ridge, with commanding distant views of the Denbighshire hills to the south. A shelter belt of trees encircling the southern end of its garden restricts, to some extent, the view cross the Elwy valley and beyond. More extensive woodland to the east will block closer views. Its setting extends south along the road to include Plas Hafod, and this would be crossed by the 132 kV Overhead Line. The surrounding landscape is far from pristine; two sets of lower voltage lines rise out of the Elwy valley and cross one another at Plas Hafod. White aggregate access tracks, modern barns/kennels and roadside furniture are prominent features in middle-distance views to the south east of the 132 kV Overhead Line. Overall, effects on its setting will be minor." (8.7.49)</i></p> <p>It is noted that Denbighshire County Council in its Local Impact Report has stated at paragraph 9.2.3 that "<i>it is accepted that in both cases [Plas Captain and Plas Newydd] the impact on the setting of these buildings will be neutral and moderate/slight respectively.</i>" The Council goes on to say at paragraph 9.3.1 that it "<i>considers the proposal would have a Neutral impact on the historic environment.</i>"</p> <p>SP Manweb also notes that the Welsh Government in its response to First Written</p>

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	<p>In addition to the above points I am very concerned about the following issues</p> <ol style="list-style-type: none"> 1. The impact of large heavy vehicles on the fabric of the narrow road leading from Marli Chapel to the entrance of the 'old lane' at Groesffordd Marli crossroads. The road is surrounded by high banks and hedges and not built to take such heavy and wide traffic. 2. I am worried about the noise and disruption of the industrial traffic on such a narrow lane between the hours of 7am until daylight ends seven days a week. 3. I am very concerned that the industrial vehicles when using the 'old lane' will be turning their vehicles in my stackyard entrance in order to make the turn. 4. I am very concerned about the proposal to remove a substantial amount of hedge opposite Bryn Arian and Trebanog for enabling works needed to bury the cable underground. It is necessary to remove such a large area of hedge? 5. It would be helpful if residents affected by the proposals could be kept informed of any changes by SP Manweb. Many residents are still unsure of the route that the underground cable will take and what developments there will be at Cwttir Lane substation. 6. Regarding the Visual Amenity Effects on Properties, last Tuesday, August 25th 2015, Gillespies acting on instructions from the SP Manweb were taking photographs on the road to the left of my house. Clearly these images were being taken to assess the visual effects of the terminal pole and pylons on my property and the two neighbouring properties. The camera was positioned opposite the entrance to the 'old lane'. The photograph minimises to the point of obscurity the actual positioning of the pole. As I live in a dip I will see it from my house, my garden, my yard, my stackyard and orchard. This photographic exercise bears no relation to the impact of the terminal pole and pylons on my property. <p>I have lived in Cefn Meiriadog all my life and feel powerless to fight against such a huge development. The fact that pylons already exist on the north side is used to justify adding more. In addition to this development Scottish Power have declared their intention to add poles to an existing line on the north side of my home. When I objected I was told by a representative of Scottish Power 'Well, you do live near a sub station'. Living in a house which has been in my family for over 50 years, and though not listed is one of the oldest cottages in the settlement, this was really quite insulting.</p> <p>I feel surrounded by poles and pylons. In truth no one wants to live near an electricity pylon or buy a house near one. Unfortunately I have a 400kV steel tower approximately 100metres from my house, and am now faced with the prospect of a 4-pole terminal pole with stays being placed 175 metres from it on the other side. Our properties are being continually devalued by this industrialisation of this very beautiful and historic part of Wales.</p>	<p>Question 9.1 has stated that "<i>Cadw has agreed the results and the findings of the heritage assessment and have no particular concerns. The route has been informed by the heritage assessment and avoids any direct impacts on designated historic assets whilst minimising any setting impacts on Scheduled Monuments / historic landscapes. The wooden pole and line is unlikely to raise any significant issues in this case.</i>"</p> <p>Although not considered as part of the Proposed Development or within the assessment (i.e. the LVIA assessment has taken a worse case scenario and assumed that infrastructure will remain in-situ), SP Manweb is, however, proposing to underground approximately 520m of lower voltage overhead line which would remove 5 stacked poles from views to southeast of Plas Newydd, and approximately 930m of lower voltage overhead line, which would remove a further 3 poles from views to the southeast. These works would have beneficial effects on the setting of Plas Newydd.</p> <p>The overall effect of the Proposed Development with or without the benefit of the lower voltage diversions, on Plas Newydd, including the landscape and visual effects, would then be neutral.</p> <p>Impacts on the Elwy Valley</p> <p>The archaeological and landscape and visual effects on the Elwy Valley have been assessed in Chapter 7 'Landscape and Visual' and Chapter 8 'Historic Environment' of the ES (DCO Document Refs 6.7 and 6.8). They have also been fully assessed within the Response to Relevant Representations in section 16.</p> <p>The 19th century poet Gerard Manley Hopkins wrote of the beauty of the Welsh landscape in his poem 'In the Valley of the Elwy'. The AA website promotes a walk named 'With the Poet to Mynydd y Gaer' which runs from Llanefydd village and over one of the Clwyd hills with views of the Elwy Valley and the Afon Elwy along the way. In April 2012 during National Poetry month, this walk was named by BBC's Countryfile as one of the 'top ten poet's walks'.</p> <p>A small section of the promoted footpath route falls within the boundary of the 2km study area, and views from the promoted route are directly covered by two of the representative viewpoints selected to inform the assessment. Viewpoint 29 is taken in proximity to the public footpath located on the elevated section of Mynydd Y Gaer and the overall significance of the effects of the Proposed Development at this location are judged to be minor. Viewpoint 31 is taken from the village of Llanefydd on the road that the route follows through the village. The overall significance of the effects of the Proposed Development at this location are judged to be negligible. Views of the Proposed Development would be largely screened by intervening topography and vegetation, and where visible, the Proposed Development would appear as a small feature in a wide view containing many other elements, including larger existing electricity network structures. Full details of the assessment can be referenced in Appendix 7.1: Viewpoint Assessment, DCO Document Ref 6.20.3D, and are summarised in Chapter 7: Landscape and Visual, Section 7, DCO Document Ref 6.7.</p> <p>Impacts on the Cefn Meiriadog Ridge (the "Bryn")</p> <p>With regards to The Cefn Meiriadog Ridge, 'The Bryn' please refer to SP Manweb's Response to Relevant Representations in Section 16.11 (iii).</p>

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		<p>Impacts on Mynydd y Gaer Hillfort</p> <p>Mynydd y Gaer Hillfort lies just outside the study area south of the Elwy Valley. It is a promoted viewpoint and Scheduled (Ancient) Monuments (SAMs) which lies in an area designated as Open Access Land. The Proposed Development lies approximately 2.2km to the east.</p> <p>Paragraph 7.7.30 considers the effects on the Open Access Land and concludes that:</p> <p><i>“The Proposed Development would have no significant effects on open access land at Llyn Brenig, Moel Fodiar and Mynydd y Gaer, due to intervening distance, the nature and scale of the Proposed Development (approximately 15m high double wood pole structures), and the screening effects of intervening landform and vegetation.”</i></p> <p>The effects on views from Mynydd y Gaer Hillfort are illustrated in Viewpoint 29 which is presented in in Appendix 7.3 (DCO Document Ref 6.20.3d).</p> <p>The assessment of views from this viewpoint concludes that the sensitivity of the receptors at this viewpoint is high, the overall magnitude of effect is small. When these are combined together the effect on visual amenity is considered to be minor and therefore not significant.</p> <p>This is because of the distances involved, the intervening vegetation and topography, distance from the alignment and scale of the Proposed Development within this landscape (from this distance the wood pole structures would have an apparent height of less than 1cm).</p> <p>The potential effects on the Mynydd y Gaer Hillfort have been assessed within Chapter 8 ‘Historic Environment’ of the ES. Although it lies just outside the study area south of the Elwy Valley, it is Scheduled (Ancient) Monument (SAM). The magnitude of is considered negligible.</p> <p><u>Undergrounding</u></p> <p>SP Manweb's starting point is its duties under the Electricity Act 1989, being:</p> <p>Section 9 – to develop and maintain an efficient, co-ordinated and economical system of electricity distribution; and</p> <p>Schedule 9 – (a) to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and (b) to do what he reasonably can to mitigate any effect which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects. Whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989). Given that National Policy Statement EN-5 sets a high threshold for refusing overhead lines in favour of undergrounding and TAN 8 explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>SP Manweb, in its design of a connection, looks at the policy guidance in both National Policy Statement EN-1 and National Policy Statement EN-5. The route of a proposed overhead line needs to be assessed considering the following:</p>

Respondent	Written Representation	SP Manweb Response
		<p>a. Is there a “<i>particularly sensitive location</i>” along the route of the 132kV Overhead Line where the effects of the 132kV Overhead Line in that locality would give rise to “<i>serious concerns</i>”.</p> <p>b. If the answer is in the affirmative, then is this an “<i>exceptional circumstance</i>”, where undergrounding the line would bring “<i>very significant benefits</i>”, which would “<i>clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable</i>”.</p> <p>SP Manweb has addressed the responses relating to the undergrounding of the Proposed Development in the following documents:</p> <ul style="list-style-type: none"> • The Planning Statement (DCO document reference 7.4) and supporting Technical Appendix (DCO document reference 7.5) look at the need for undergrounding in detail. • SP Manweb’s response to Relevant Representations (SPM NWWFC RR Document 1 submitted as part of SP Manweb’s Deadline 1 Submission) Section 19 provides further information regarding SP Manweb’s decision to route the Proposed Development overhead and the costs associated with placing the development underground. • SP Manweb’s response to FWQ 8.1 reiterates SP Manweb’s position that a wholly underground design cannot be justified given Government policy accepts the need for overhead lines and the relatively higher costs of such a scheme in this case. <p>SP Manweb’s assessment concludes that the 132kV Overhead Line does not give rise to any major adverse landscape and visual effects (and thus serious concerns, being a test in National Policy Statement EN-5) and does not produce major adverse effects on any cultural heritage assets (and thus substantial harm, being a test in National Policy Statement EN-1). There is, therefore, no justification for any undergrounding in part. Furthermore, the route of the 132kV Overhead Line has been chosen as it minimises the impacts on the environment when compared with the alternative route options.</p> <p><u>Historic Environment – the “track” at Groesffordd Marli</u></p> <p>The existing holloway ‘track’, which runs from the south side of Groesffordd Marli to Hafod, appears as a road on the tithe map of 1846. The track is not designated as a national asset and nor does it benefit from protection within the Lower Elan Valley Historic Landscape Area HLW (C) 4, which lies over 550m to the south east at its nearest point. The track is not recorded in the regional Historic Environment Records of Denbighshire Council.</p> <p>The track, together with other existing roads, trackways and fields form part of the historic landscape setting of the village of Groesffordd Marli (HERS 105497). The village and its setting (including the track) have been assessed in SP Manweb’s historic environment chapter of the ES (Table 8.13 and Paragraph 8.7.76, Figures 5, 32). Groesffordd Marli is ascribed “Medium” importance. The determined visual effect is determined as “Minor”, and the corresponding significance of that effect is “Slight” and not, therefore, significant.</p> <p><u>Socio-economic impact and historic environment impacts on “the old lane”</u></p> <p>The lane referred to is not included within the DCO Application and is not part of the Proposed Development. SP Manweb can confirm that the accesses that it is seeking consent for do not provide access on to or from the “old lane.”</p> <p>The Wider Scheme (see Chapter 1 ‘Introduction’ of the ES (DCO Document Reference 6.1)</p>

Respondent	Written Representation	SP Manweb Response
		<p>includes a section of underground cable from the existing substation at St Asaph to the terminal pole.</p> <p>SP Manweb originally proposed to locate this cable within the track. During the design development and in response to consultees' feedback about the local value of the lane, SP Manweb relocated its proposed underground cable into the adjoining field rather than along the track.</p> <p>SP Manweb's response to Relevant Representation 8 in its Response to Relevant Representations (DCO Document Reference SPM NWWFC RR Document 1), discusses the likely view of the terminal pole when viewed from the nearest residential properties on Groesffordd Marli to Glascoed Road.</p> <p><u>Cumulative effects</u></p> <p>Chapter 4 of the ES 'EIA Methodology' (DCO Document Reference 6.4) describes the basis of the assessment. Existing development is included within the baseline against which the Proposed Development has been assessed. This chapter also identifies which projects have been included in the assessment of combined and cumulative effects and explains why this is the case. Please also see SP Manweb's response to FWQ 6.14 (DCO Document Reference SPM NWWFC ExA1).</p> <p>The Crematorium has been considered as part of the cumulative assessment and is considered unlikely to give rise to cumulative effects when seen alongside the Proposed Development. A map of the crematorium's location has been provided to the ExA in response to FWQ 8.16 and is contained in Appendix 8,16 (DCO Document Reference SPM NWWFC ExA1 Appendices)</p> <p><u>Environmental and Design Concerns</u></p> <p>In response to Points 1 to 3:</p> <p>Please see SP Manweb's response to FWQ 3.2 regarding the potential impact of construction traffic on the local community.</p> <p>Chapter 12 of the ES (DCO Document Reference 6.12) sets out in detail the traffic and transport impact assessment carried out for the Proposed Development. The assessment concludes that, with embedded and specific mitigation measures as outlined in the Construction Environmental Management Plan (CEMP, DCO Document Reference 6.18) and supported by the outline Traffic Management Plan (TMP, DCO Document Reference 6.18E) there will be no significant effects associated with the Proposed Development.</p> <p>Additional mitigation measures identified in the outline TMP include restrictions, signing, temporary traffic management measures and communications.</p> <p>Although primarily designed to minimise the effects of construction traffic on the highway network, these measures will also have a benefit on the local community by reducing HGV movements, using the appropriate size vehicle and reducing flows in the peak periods.</p> <p>The level of construction traffic associated with the Proposed Development is considered to be minor in nature.</p> <p>The outline TMP, which forms part of the outline CEMP, is secured via Requirement 13 of the draft DCO. Requirement 13 of the DCO will ensure that the final TMP, which will form part of the final CEMP, is prepared and submitted for approval to the relevant planning</p>

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		<p>authority prior to any stage of the authorised development commencing.</p> <p>Regarding construction noise, embedded mitigation has been incorporated into the application in the form of the Construction Environmental Management Plan, which will be secured by Requirement 13 of the draft DCO. SP Manweb's responses to noise and construction hours are clearly set out in its responses to FWQ 3.21 to 3.26 (DCO Document Reference SPM NWWFC ExA1).</p> <p>Responding specifically to vehicles leading from Marli Chapel to the entrance of the "old lane" at <i>Groesffordd Marli</i>, this has not been identified as a haulage route as identified in the Outline Traffic Management Plan (DCO Document Ref 6.18E). As such, no impact is anticipated in connection with large heavy vehicles on the fabric of the narrow road leading from Marli Chapel to the entrance of the 'old lane' at Groesffordd Marli crossroads.</p> <p>Responding specifically to industrial vehicles using the 'old lane' turning their vehicles in Ms Williams' stackyard entrance, the lane referred to is not included within the DCO Application and is not part of the Proposed Development. SP Manweb can confirm that the accesses that it is seeking consent for do not provide access on to or from the "old lane."</p> <p>In response to Point 4:</p> <p>SP Manweb is seeking to temporarily remove a section of hedge as referenced by Ms Williams to provide access for construction traffic and for underground cable installation. The hedgerow will be fully reinstated following the completion of construction works. The width included with the Order Limits is the maximum width required and SP Manweb aims to remove approximately 5m width of hedgerow in most cases. In this location there is the need for construction access and the installation of the underground cable and so to ensure safe working practices enough width is required to allow both to happen at the same time. The removal and reinstatement of hedgerows is controlled through the Hedgerow Management Plan (DCO Document Reference 6.18C V2).</p> <p>In response to Point 5:</p> <p>The route of the underground cable from St Asaph substation to the Terminal pole is detailed in Technical Appendix 1.2 (DCO document reference 6.17.2). The appendix also includes an environmental report on the potential impacts of the proposed underground cable. Since the submission of the DCO application SP Manweb has carried out further studies to confirm the route of the underground cable. Please see SP Manweb's response to FWQ 1.12 for further information. SP Manweb will keep the local community updated of the route and likely timescales for the laying of the underground cable.</p> <p>In response to Point 6:</p> <p>The photography exercise referred to was in direct response to FWQ8.17 requesting an additional viewpoint in proximity to the old lane and residential receptors in close proximity to the terminal pole at Groesffordd Marli. A viewpoint was not originally identified in this location due to the intervening hedge and the therefore obscured views of the Proposed Development. The photography was therefore pursuant to the assessment of landscape and visual impacts in Chapter 7 of the Environmental Statement (DCO Document Reference 6.7), and was not intended to inform any assessment of the impact of the Proposed Development on Ms Williams' property.</p>

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		<p>As noted in Chapter 7 'Landscape and Visual, Visual Effects, Section 7.4.11:</p> <p><i>'The assessment of visual effects addresses potential changes in peoples' views or visual amenity caused by the appearance and prominence of the Proposed Development in those views. In accordance with GLVIA3, the assessment focusses on publicly accessible rather than private viewpoints, and on those receptor groups who are likely to be most sensitive to the effects of an overhead line and its associated infrastructure. Receptor groups which were assessed include communities, where views contribute to the wider landscape setting enjoyed by residents in the area, road users, and residents or visitors using recreational routes, features and attractions.'</i></p> <p>As such, viewpoint locations were chosen to represent views from visual receptors including users of footpaths and rights of way, settlements and road users. They are not selected to represent private views from individual properties as this would not be in accordance with GLVIA3.</p> <p>GLVIA3 (paragraph 6.3.6) notes that when undertaking <i>residential visual amenity assessments</i>, it is occupiers of rooms normally occupied during waking or daylight hours (assumed to be downstairs) that are likely to be more susceptible to changes in their visual amenity as views from these rooms are likely to be experienced for longer than those experienced by someone briefly passing through an area. This guidance with its emphasis on primary views formed the basis for the assessment. Irrespective of this guidance residential visual amenity assessments are undertaken from publicly accessible locations, not from within residential properties. GLVIA 3 (paragraph 6.17) notes that it is impractical to visit and produce private viewpoints from each residential receptor.</p> <p>As such, residential visual amenity assessments are largely informed by detailed site survey, GIS postcode data, site photographs, relevant aerial mapping data, consultation feedback, etc, and where relevant, by representative viewpoints taken from publically accessible locations.</p>
Rhyl & St Asaph Angling Association	<p>Thank you for the letter sent by Planning Inspectorate dated 04/08/15, which sets out the timetable. There have been no changes in our position since my last letter dated 21/07/15, and ask that this be noted.</p>	<p>SP Manweb acknowledges and welcomes that the Angling Association does not object to the Proposed Development. SP Manweb has also confirmed to the Angling Association that it is seeking to complete a voluntary agreement in the form of an Option Agreement in relation to their rights identified within the Book of Reference. Such an agreement would allow SP Manweb to enter into a Deed of Grant prior to the construction of the Proposed Development. SP Manweb is currently in discussions with the Angling Club in relation to the completion of this Option Agreement.</p> <p>The only outstanding issue between the parties is the matter of compensation. SP Manweb has made offers to the Angling Association to pay their reasonable professional fees and a commercial offer in respect of the loss of their rights. SP Manweb will continue to negotiate terms of the compensation, whilst nothing that compensation is not a matter for the Examination process, rather the Upper Tribunal should consent be granted and no voluntary agreement reached.</p>
Robin Barlow	<p>SP Manweb in their Strategic Options Report on "The North Wales Wind Farms Connection Project" dismiss the use of undergrounding and select the Heavy Duty Wood Pole (HDWP, a twin pole with a heavy steel superstructure) as the solution needed for this connection. A solution that has a massive visual impact. That document</p>	<p><u>Line Design</u></p> <p>SPM recognised the need for an earth wire to lower the earth potential rise (EPR) at the proposed Clocaenog Collector Substation following earthing studies that were carried out.</p>

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	may outline the truth but not the whole truth.	The ground conditions at the proposed Collector Substation site are very poor.
	From Single Heavy Duty Wood Pole Circuit to Single Circuit Double Wood Pole Design The SP Manweb Strategic Options Report of May 2013 (i.e. the version of the document used in the consultations) proposes “a single heavy duty wood pole 132kV circuit...” for all the connection options. There are no pictures of the pole.	The SP Manweb standard arrangement on overhead lines in terms of providing such an earth wire is via an overhead conductor. This provides the most economic solution when compared to a stand-alone buried conductor solution. The cost and associated construction disruption of excavating and laying a separate earth cable (counterpoise) along the whole of this overhead line route is prohibitive and has been discounted.
	One year later in the Overview Report of March 2014 they say in the Introduction “Currently a double pole wood construction is proposed.... A number of studies are underway to see if a lighter single pole design would be suitable and present the double pole solution as a “worst case” illustration”. This time there is a picture of the HDWP with a massive steel superstructure of larger than 5m x 1m.	Further, the double wood pole design is required not only to carry the earth conductor. The Design and Construction Report (DCO Document Reference 7.1) paragraph 2.2.21 relates to the need to support the 300sqmm UPAS conductors. The double wood pole design is therefore required not only for the earth wire, but also to support the 300sqmm conductor, in particular in relation to the forces associated with the weight and tension of the 300sqmm UPAS conductor arrangement.
	In the submission to this Inquiry “The 132kV Overhead Line proposed is a single circuit double wood pole design” and “an earthed design, such as the double wood pole proposed, is required for the Proposed Development. The single wood pole design does not carry an earth and therefore cannot be used for the Proposed Development” (6.2 ES Chapter 2 - Description of Proposed Development).	A single wood pole design could in theory be used, but would require a considerably reduced span length to accommodate the higher weight and tension of the conductors. This would result in a significant increase in the number of pole locations, which would have a consequential detrimental effect on landowners and the public.
	Surprising that they did not know of this issue earlier, as this HDWP single circuit double wood pole design has long been SP Manweb's solution of choice for connecting wind farms It is used for the connection of Rhyl Flats to Moelfre and is proposed for the Llandinam wind farm connection to Welshpool applied for in 2009.	SP Manweb use single pole designs wherever possible but for the reasons set out above the single wood pole design in this instance would not meet the Electricity Act 1989 tests on two counts; first, the earth wire would need to be underground - the cost of which along the length of this line and the terrain would be prohibitive meaning the option would not be an efficient or economic solution nor comply with the statutory duty to maintain an efficient co-ordinated and economical system of electricity distribution; second, to carry the weight of the 300sqmm UPAS conductor arrangement, a significant increase in poles would be required, which would not reasonably mitigate environmental effects and thus not comply with SP Manweb's Schedule 9 duties in the Electricity Act 1989.
	The Statement “ The single wood pole design does not carry an earth and therefore cannot be used for the Proposed Development” is also not the whole truth. It ignores the so-called counterpoised solution in which the earth is undergrounded but the current carriers remain overhead. This option has not been considered by SP Manweb. This solution would certainly allow the use of a much lighter steel superstructure and possibly the use of a single pole design. It should be considered.	<u>Undergrounding</u>
	8% Undergrounding In that same document SP Manweb reveals that some 253km of their 1286km 132Kv network is undergrounded (19.7%) although in North and Mid Wales the proportion undergrounded drops to only 7.9%. On the connection between Clocaenog and St Asaph they propose undergrounding 1.8 km of the 19km route, a figure in line with their current value for Wales. However, it is important to note that they are undergrounding not to reduce the visual impact at a sensitive point but in order to go under the national grid's 440 KV power line and then get into the substation complex in an area full of 33 KV local distribution power lines.	The SP Manweb 2015 capital construction cost of undergrounding 132kV cables is estimated to be between £1,150,000 and £1,640,000 per km depending on the difficulty of the ground conditions. Western Power Distribution, in its life time costs estimate for its Brechfa Forest project, estimated the capital costs for that project ranged per km from £950,000 to £1,003,000. This is a difference between the two projects of £200,000 – £637,000 per km (such a difference being due to the particular ground conditions for each project and the extent of the changes in ground conditions throughout the route of each project). The figures are therefore comparable.
	Undergrounding merely the same amount for visual mitigation would allow them at the north end to move the termination poles around 1km back into the Elwy valley and a the southern end to start around 1km away from the large Clocaenog / Saron substation.	The SP Manweb 2015 capital construction cost of 132kV overhead double wood pole is estimated to be £340,000 per km. Therefore, the capital construction costs of undergrounding cables for the Proposed Development is between 4.7 and 6.7 times that of an overhead line.
	Moving the 4-pole terminator construction back into the Elwy valley would mean that the long limestone ridge (the Bryn) that dominates the skyline in middle of Cefn would no longer be disfigured. In fact it would also save SP Manweb the cost having to underground a section of its 33KV network (“This line would be undergrounded between the existing poles 10 – 30”). Likewise undergrounding around 1km at the	These figures are for capital construction costs and have no relation to the factors referred to, namely financial drivers of the project: such line costs, connection costs, the Return On Capital allowed by Ofgem or the tariffs that can be applied per kw/h to the subsidised Wind Farms. As this is a customer funded connection, all capital costs are for the Developer, and not for the public. For this request SP Manweb have reviewed the options and have proposed the least cost

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	<p>Clocaenog (Tir Mostyn) end would remove the visual impact of the heavy poles at a ridge and additionally eliminate the need for the 9 metre gantry at the Saron / Clocaenog substation, thus significantly reducing the industrialisation of that immediate area.</p> <p>In its submission to the Llandinam Wind farm Connection Inquiry the Campaign for the Protection of rural Wales has pointed out that undergrounding is increasingly being seen as the solution of choice for the future and also that current undergrounding costs as quoted are significantly higher than the results in practise seen in other countries. For example CPRW in that document quotes a Danish study with undergrounding costs for a 132kV line at £412,000 per km whereas SP Manweb's submission to the same inquiry gives the costs for undergrounding vs Heavy Duty Wood Poles at £1.1 million vs. £0.34 million per kilometre (Proof of Evidence by Eric Paalman, Lead Engineer SP Energy Networks). Unfortunately in its consultation phase SP Manweb revealed none of the financial drivers of the project: such line costs, connection costs, the Return On Capital allowed by Ofgem or the tariffs that can be applied per kw/h to the subsidised Wind Farms. It is thus impossible for the lay person to balance options and additional costs. This is further complicated by the fact that "the costs are to be met by the Wind Farm developers".</p> <p>Conclusion</p> <p>I conclude that SP Manweb has been negligent in its presentation of the options in that it</p> <ol style="list-style-type: none"> 1) has totally ignored the counterpoised solution of undergrounding only the earth wire. 2) Has not consulted on potential mitigation of visual impacts at either ends of the connection through the use of some additional undergrounding. 3) Has forced through the cheapest solution and the connection via the shortest route – a double win for SP Manweb, ironic in view of the fact that it is the wind farms that will bear this cost and they seem to be concerned to provide community benefit (e.g. RWE with £768,000 per year). Note that the Inquiry into the Llandinam Wind farm connection is part of the Mid Wales Conjoined Wind Farms Inquiry. 	<p>option. It will be impracticable to install a cable section underneath the river Elwy at the location where the overhead line crosses. Taking into account that the scheme already includes 2.6km of 132kV underground cable cost it is not deemed sensible to extend the original section. A more economical approach would be to reroute the whole underground section to a different access point to the overhead line. Undergrounding the line across the Afon Elwy Valley to just behind its southern ridge, results in an increase in cost of approximately £4M when compared with not undergrounding this section. (cable route including crossing of the river, less OHL not installed, less cost of associated diversions not undertaken)</p> <p>As explained in the response to Lois Williams above and Meirick Davies below, whilst the effects on the Afon Elwy Valley were assessed as moderate, none were assessed as major and thus none give rise to serious concerns under NPS EN-5. Accordingly, the increase in cost of approximately £4M is not justified given the assessed level of impact identified.</p> <p><u>Conclusions</u></p> <ul style="list-style-type: none"> • SP Manweb has considered the counterpoise earth wire solution and rejected this on technical grounds; • Undergrounding options at each end of the Proposed Development, to facilitate access into the substations, have been considered; • The total capital cost of this connection is for the Developers of the wind farms connecting to it. SP Manweb has an obligation under the Electricity Act 1989 to provide an economical solution.
<p>Guthrie Jones & Jones on behalf of Richard Glynne Jones</p>	<p>We act on behalf of Mr Richard Glynne Jones of Hafod Olygfa Saron Denbigh. The proposed connection involving the erection of overhead electrical pylons along our client's land in objected for inter alia the following reasons.</p> <ol style="list-style-type: none"> 1. Our client has recently granted a lease of land near to the proposed development to a wind energy company. In the lease our client covenants not to erect any structure within 200 meters of a recently constructed wind turbine. If our client permits the development then he will be in breach of contract. 	<p><u>Points 1 and 2</u></p> <p>SP Manweb notes this submission on behalf of Mr Glynne Jones. It is SP Manweb's understanding that the leasehold interest that this submission refers to is Melin Wynt Hafodty's leasehold interest in respect of Plots 6 and 6A in Part 1 of the Book of Reference Version 2 submitted at Deadline 1.</p> <p>Should the DCO be made, then Mr Glynne Jones would not be breach of the restrictive</p>

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	<p>2. The property over which the pylons are proposed to be erected is prime wind turbine development land. Our client has already been approached by developers with a view of offering the land to lease for wind turbines. If the electrical pylons were erected then this would prevent the development of the land for wind turbines.</p> <p>3. Our client's house Hafod Olygfa is situated near the land. The erection of a number of electricity pylons will affect our client's property and it's value and the view from our client's property will be blighted.</p> <p>4. The proposed erection of the pylons would be a breach of our client's human rights namely Articles 1, 6 and 8.</p> <p>5. The electricity lines could be placed underground, which our client, would not in principal oppose.</p> <p>6. There are other routes for the electrical lines which would not impact upon our client's property and which are also shorter routes.</p> <p>Please note that our client wishes to make representations at the compulsory acquisition hearing on the 24th / 25th September 2015 and will elaborate upon the points made above. Our client wishes to make those representations in Welsh. Please confirm when our client should attend the hearing for his allocated time.</p>	<p>covenant as Article 22 would suspend the restrictive covenant in so far as it continuance would be inconsistent with the exercise of the rights created under the DCO. SP Manweb can confirm that the 132kV Overhead Line would be 134m away from the wind turbine, which is in compliance with the toppling distance of wind turbines (being 100m).</p> <p>Please refer to SP Manweb's Response to Relevant Representations Document (SPM NWWFC RR Document 1) submitted as part of SP Manweb's Deadline 1 Submission. Section 2.5 of that document considers the loss of land for future development proposals, including that of the Interested Parties (IPs). Section 14.3 of the same document also considers the impact of the Proposed Development on areas leased for wind turbines and specifically considers the IP's land in this response.</p> <p><u>Point 3</u></p> <p>SP Manweb considers that the Proposed Development will be viewed in the context of the IPs newly established wind turbine and his plans for any additional turbines in close proximity to his property.</p> <p>Please refer to SP Manweb's Response to Relevant Representations Document (SPM NWWFC RR Document 1) submitted as part of SP Manweb's Deadline 1 Submission. Section 3.3 considers the financial impact to business, property and practice and future expansion plans and section 3.4 considers the financial impact of the Proposed Development on property values.</p> <p>The assessment presented in the ES Chapter 7 'Landscape and Visual' and its Appendices (DCO Document References 6.7 and 6.20) finds that the overall significance of visual effects resulting from the Proposed Development at Hafod Olygfa will be minor, but could increase to moderate if the poles are moved to the edge of the Limits of Deviation. The full detail of the assessment can be found in Appendix 7.1 to the ES: 'Residential Visual Amenity Assessment' (DCO Document Reference 7.20.1). The following is an extract:</p> <p>"<i>Assessment:</i> A single-storey detached property, approximately 110m from the nearest pole located on the centreline of the Limits of Deviation on the eastern flank of the Tir Mostyn ridge.</p> <p>The distance to nearest point on the edge of the Limits of Deviation is approx. 90m - this represents the worst case scenario in terms of potential nearest proximity to the Proposed Development.</p> <p>Primary views would be to the front (north east) of the property. The garden area also lies to the front of the property. Current views are expansive, extending to the Clwydian Range in the far distance. Views are rural, with some widely scattered properties. Agricultural buildings lie 100m from the property at Hafod Ty Ddu. There is an existing wirescape (telegraph poles) and the Tir Mostyn Wind Farm is visible from the rear of the property.</p> <p>Ground floor windows to the rear look towards the Proposed Development. Rising landform, intervening hedgerows, a minor road and pastures between the property and the Proposed Development, would reduce the effects on views.</p> <p>The property would have oblique views of the Proposed Development as it ran from south to north along the western flank of the Tir Mostyn ridge. Eight poles are likely to be visible (approximately 4 to the front, and 4 to the rear) some of which would be backclothed by distant landform. The tops of the poles and the conductors (wires) are likely to be visible since the Proposed Development is located just over the western flank of the Tir Mostyn</p>

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		<p>ridge.</p> <p><i>Sensitivity:</i> High</p> <p><i>Magnitude:</i> Medium</p> <p><i>Rationale and Summary:</i> Views of the Proposed Development would be oblique, and other development (including a wind farm and agricultural buildings) are present in existing views, and as such the effects would be minor, and not significant.</p> <p>Minor (not significant)</p> <p>Note that effects on views from this property would become more significant if the poles were positioned on the edge of the Limits of Deviation, closer to the receptor, and could become moderate, and therefore significant.”</p> <p>As noted, the significance could change to moderate if the poles moved to the edge of the Limits of Deviation. This would be due to the number of poles visible (in oblique views, or in views from the rear and side of the property), their proximity to the receptor and the open nature of the landscape in this upland location. It would not be possible to fully screen the Proposed Development in this location.</p> <p><u>Point 4</u></p> <p>Please refer to SP Manweb’s Response to Relevant Representations Document (SPM NWWFC RR Document 1) submitted as part of SP Manweb’s Deadline 1 Submission. Section 13.3 considers the proximity of the Proposed Development to residential properties and the potential for infringement upon human rights.</p> <p><u>Point 5</u></p> <p>SP Manweb's starting point is its duties under the Electricity Act 1989, being:</p> <p>Section 9 – to develop and maintain an efficient, co-ordinated and economical system of electricity distribution; and</p> <p>Schedule 9 – (a) to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and (b) to do what he reasonably can to mitigate any effect which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p> <p>Whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989). Given that National Policy Statement EN-5 sets a high threshold for refusing overhead lines in favour of undergrounding and TAN 8 explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>SP Manweb, in its design of a connection, looks at the policy guidance in both National Policy Statement EN-1 and National Policy Statement EN-5. The route of a proposed overhead line needs to be assessed considering the following:</p> <p>a. Is there a “<i>particularly sensitive location</i>” along the route of the 132kV Overhead Line where the effects of the 132kV Overhead Line in that locality would give rise to</p>

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		<p><i>“serious concerns”</i>.</p> <p>b. If the answer is in the affirmative, then is this an <i>"exceptional circumstance"</i>, where undergrounding the line would bring <i>“very significant benefits”</i>, which would <i>"clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable"</i>.</p> <p>SP Manweb has addressed the issue of placing the Proposed Development underground in the following documents:</p> <ul style="list-style-type: none"> • The Planning Statement (DCO document reference 7.4) and supporting Technical Appendix (DCO document reference 7.5) look at the need for undergrounding specifically in this location in detail; • SP Manweb’s response to Relevant Representations (SPM NWWFC RR Document 1 submitted as part of SP Manweb’s Deadline 1 Submission) Section 19 provides further information regarding SP Manweb’s decision to route the Proposed Development overhead and the costs associated with placing the development underground. <p>SP Manweb's assessment concludes that the 132kV Overhead Line does not give rise to any major adverse landscape and visual effects (and thus serious concerns, being a test in National Policy Statement EN-5) and does not produce major adverse effects on any cultural heritage assets (and thus substantial harm, being a test in National Policy Statement EN-1). There is, therefore, no justification for any undergrounding in part. Furthermore, the route of the 132kV Overhead Line has been chosen as it minimises the impacts on the environment when compared with the alternative route options.</p> <p><u>Point 6</u></p> <p>The Strategic Options Report (DCO Document Reference 7.3) considered 10 options to connect to the windfarm. The connection and route chosen was the shortest option available that provided for the capacity and a technically acceptable solution whilst mitigating and minimising impact on the environment.</p>
<p>David Roberts</p>	<p>The results of SP Manweb’s primary and desk studies lack detail and are a misrepresentation of the areas’ landscape, wildlife and environment. Their ecological and environmental observations are an overview of the route and appear vague and lacking in detail. I for one know that these primary studies have not been conducted accordingly and corners have been cut. For instance, the Hafod dingle valley, part of my land where the proposed line crosses, has not been investigated on foot. This section of the route is an area of significance in terms of the wildlife that habitat here, the landscape, and other natural features. This area of woodland is a significant habitat for many wildlife species and contains other natural features such as a waterfall and a historic cave. This area of the dingle valley where the line supposedly crosses consists of an 80m drop. A proposal of this magnitude would have a detrimental impact on wildlife here and the isolated landscape.</p> <p>SP Manweb’s application has effectively dismissed many ecological and environmental effects as being insignificant, based on their own subjective analysis. This is a complete contradiction to my knowledge</p> <p>Pylons are a negative externality to all the residents of this area who receive no benefit from the proposed development.</p> <p>Overhead lines and pylons cause a significant blight to property values, up to 20% in</p>	<p><u>Ecological Impacts on the Hafod Dingle Valley</u></p> <p>The studies which have been undertaken as part of the EIA process have all been carried out in accordance with relevant guidance. In terms of landscape and visual this is explained in SP Manweb’s Response to Relevant Representations (Section 16.11 (iv), DCO Document Reference SPM NWWFC RR Document 1). NRW in its Written Representation has confirmed at paragraph 3.7.2 that it considers <i>"the methods used in the Landscape and Visual Impact Assessment to be appropriate, compliant with current guidance and we concur with the assessment of residual effects."</i></p> <p>The methodology for the Ecological Impact Assessment is set out in Chapter 6 of the ES ‘Ecology and Biodiversity’ (DCO Document Ref 6.6). NRW has stated in its Written Representation at paragraph 3.8.1 that: <i>‘in our view the content of Environmental Statement Chapter 6 is sufficient to inform decisions concerning methods and procedures needed to protect nationally and internationally protected species’</i>.</p> <p>The woodland at Hafod Dingle has been identified and considered within Chapter 6 ‘Ecology and Biodiversity’ of the ES (DCO Document Ref 6.6)</p>

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	<p>some cases where pylons can be seen from the residence. My property/farmhouse is identified by SP Manweb under the assessment of Cumulative Residential Amenity Effects as significantly affected by the proposal. For me personally, and for the sake of my family's future, this could potentially be a financial burden. From the business perspective, pylons and overhead cabling pose significant issues. Pylons take up valuable land and they will have an impact on farming decisions concerning the use of land from season to season. They will restrict my flexibility in terms of what I can do on my own land. There are also issues concerning health and safety, specifically when livestock are grazing in fields containing pylons and when agricultural machinery are being used to conduct essential land maintenance work.</p> <p>There are no areas along the route suitable for pylons. SP Manweb has dismissed the underground option on the basis that "the costs of a fully underground solution were unacceptable and therefore this was not taken forward". However, the cost of the overhead line is not presented and so it is impossible to determine the incremental cost of undergrounding, and there is no transparency in their cost-benefit calculation. Energy losses are up to 50% less by undergrounding. Both Conwy and Denbighshire County Councils have passed motions for full undergrounding; this being a policy in Conwy.</p>	<p>Paragraph 10.7 of SP Manweb's Responses to Relevant Representations (DCO Document Reference SPM NWWFC RR Document 1) considers the effect on Hafod Dingle Valley. Mitigation measures would be implemented in this area, including undertaking works during the winter months which would benefit regrowth and timing the works around species such as dormice, great crested new and breeding birds. SP Manweb notes that NRW, whose remit is to ensure that the environment and natural resources of Wales are sustainably maintained, has not objected to the Proposed Development and considers that the Proposed Development is unlikely to have significant adverse impacts on the components of the environment within its remit, which includes ecology.</p> <p><u>Lack of Benefits to Residents</u></p> <p>SP Manweb considers that the Proposed Development will deliver benefits to the community as users of an enhanced electricity network distributing urgently needed electricity generated from renewable sources. National Policy Statement EN-1 at paragraph 3.7.3 states explicitly that "...<i>electricity network infrastructure....provide crucial national benefits, which are shared by all users of the system.</i>" SP Manweb refers to paragraph 17.5 of the Response to Relevant Representations.</p> <p><u>Impact on Property Value</u></p> <p>As set out in paragraph 3.4 of the Response to Relevant Representations, SP Manweb notes that perceptions of impacts on property values are not matters that the Secretary of State would regard as being material, relevant or important to her decision.</p> <p>If the DCO is made by the Secretary of State, compensation will be determined in accordance with the Compensation Code created by the Compulsory Purchase Act 1965, the Land Compensation Acts 1961 and 1973 and case law. Compensation may be payable in respect of (among other things) decrease in market value of the land, disturbance loss and the matters outlined in section 3.3 above. As such, this issue is a matter which SP Manweb regards as having been fully responded to in this document and SP Manweb considers that this is therefore not an issue that should require further consideration at Examination.</p> <p><u>Impact on Agricultural Use of the Land</u></p> <p>The Proposed Development has been designed to minimise the number of poles required, whilst ensuring compliance with SP Manweb's specification for overhead lines of the kind proposed. One of the reasons this approach is taken is to minimise the effect on agriculture.</p> <p>As set out in paragraph 2 of the Response to Relevant Representations, it is acknowledged that there will be a permanent loss of some agricultural land arising from the footprints of the poles. The extent of land required for this purpose will be relatively minor compared with the overall area of the agricultural land holdings. Mitigation for financial loss associated with the loss of agricultural land is set out in paragraph 3 of the Response to Relevant Representations.</p>

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		<p>SP Manweb considers that the likely significant effects of the Proposed Development on agricultural land uses (specifically pasture for grazing and arable land) will be minor. In terms of impacts on agricultural operations, it is considered that these will also be minor because they will be limited to impacts arising from the loss of agricultural land within the footprints of the electrical poles and stays.</p> <p>The outline CEMP requires SP Manweb to liaise with owners and occupiers to ensure that disruption to farming activities is kept, where possible, to a minimum, The outline CEMP also requires working areas to be fenced off from animals to ensure they are kept at a safe distance. SP Manweb refers to its responses to FWQs 3.28, 4.1 and 4.7.</p> <p><u>Undergrounding</u></p> <p>SP Manweb's starting point is its duties under the Electricity Act 1989, being:</p> <p>Section 9 – to develop and maintain an efficient, co-ordinated and economical system of electricity distribution; and</p> <p>Schedule 9 – (a) to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and (b) to do what he reasonably can to mitigate any effect which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p> <p>Whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989). Given that National Policy Statement EN-5 sets a high threshold for refusing overhead lines in favour of undergrounding and TAN 8 explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>SP Manweb, in its design of a connection, looks at the policy guidance in both National Policy Statement EN-1 and National Policy Statement EN-5. The route of a proposed overhead line needs to be assessed considering the following:</p> <ol style="list-style-type: none"> Is there a “<i>particularly sensitive location</i>” along the route of the 132kV Overhead Line where the effects of the 132kV Overhead Line in that locality would give rise to “<i>serious concerns</i>”. If the answer is in the affirmative, then is this an “<i>exceptional circumstance</i>”, where undergrounding the line would bring “<i>very significant benefits</i>”, which would “<i>clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable</i>”. <p>SP Manweb has addressed the issue of placing the Proposed Development underground in the following documents:</p> <ul style="list-style-type: none"> The Planning Statement (DCO document reference 7.4) and supporting Technical

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		<p>Appendix (DCO document reference 7.5) look at the need for undergrounding specifically in this location in detail.</p> <ul style="list-style-type: none"> • Paragraph 19 of the Response to Relevant Representations provides further information regarding SP Manweb's decision to route the Proposed Development overhead and the costs associated with placing the development underground. • SP Manweb's response to FWQ 8.1 reiterates SP Manweb's position that a wholly underground design cannot be justified given Government policy accepts the need for overhead lines and the relatively higher costs of such a scheme in this case. <p>SP Manweb's assessment concludes that the 132kV Overhead Line does not give rise to any major adverse landscape and visual effects (and thus serious concerns, being a test in National Policy Statement EN-5) and does not produce major adverse effects on any cultural heritage assets (and thus substantial harm, being a test in National Policy Statement EN-1). There is, therefore, no justification for any undergrounding in part. Furthermore, the route of the 132kV Overhead Line has been chosen as it minimises the impacts on the environment when compared with the alternative route options.</p>
<p>Shelia Harman</p>	<p>1. Landscape</p> <p>a. The landscapes involved have very significant national and international value and are staggeringly beautiful.</p> <p>i. The rural landscape will become industrialised, there will be immense damage during construction and given that we are some time away from energy storage, wind power will always require back up, how can it be justified to allow this development here?</p> <p>ii. The impact on visual tranquillity will be immense in such areas of outstanding natural beauty - North Wales is famous for its wild spaces and magnificent iconic landscapes.</p> <hr/> <p>2. Grid connection</p> <p>a. The Wind Farms have been granted planning permission without approved grid connections. The cumulative effect of these in combination with the grid connection should make it imperative for Wind Farms and their grid connections to clear planning simultaneously - or not at all.</p> <p>i. With no definitive grid connection confirmed, how can it be possible to accurately establish cumulative and in combination effects of all these projects in respect of habitat, noise and infrastructure? 1. For example, the proposed Clocaenog Wind Farm had two connection possibilities raised during the inquiry.</p> <p>At that time Natural Resources Wales (NRW) stated that there could be a small risk of in-combination effects and Inspector Mrs. Wendy Burden's attention was drawn to the precautionary principle.</p>	<p><u>Landscape Impacts</u></p> <p>The Proposed Development is required to connect wind farms which already have consent.</p> <p>Perception of tranquillity is one of the criteria considered when making judgements on the susceptibility and value of the different landscapes along the Proposed Development. These criteria are presented in Tables 7.3 and 7.4 of the Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7). Areas which are tranquil are more likely to be influenced by the presence of overt man-made structures, or visual or audible intrusion and therefore are more likely to be of higher value and more susceptible to the Proposed Development (although tranquillity is one of a number of other criteria which have to be balanced in order to arrive at judgements on value and sensitivity). The judgement on value and susceptibility was considered alongside the predicted magnitude of change to give an overall evaluation on significance of effect. Any effect judged to be moderate or major is considered significant. Consideration of tranquillity was therefore built into the assessment process presented in Chapter 7 'Landscape and Visual' (DCO Document Reference 6.7).</p> <p><u>Cumulative Impacts of the Wind Farms</u></p> <p>Chapter 4 of the ES 'EIA Methodology' (DCO Document Ref 6.4) describes the basis of the assessment. Existing development is included within the baseline against which the Proposed Development has been assessed. This chapter also identifies which projects have been included in the assessment of combined and cumulative effects.</p> <p>The Proposed Development is required to connect wind farms which already have consent. These wind farms have been considered within Stage 1 of the Cumulative Assessment as explained in Chapter 4 of the ES (DCO Document Reference 6.4).</p> <p><u>The approvals process for NWWF connection</u></p> <p>SP Manweb does not agree with Ms Harman's opinion that the "<i>integrity of a connection application inquiry must surely be called into question</i>" in circumstances where the Wind</p>

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	<p>b. It cannot be right to grant permission for wind farms without agreed connections. In my opinion, when this happens, the integrity of a connection application inquiry must surely be called into question. It would be naive to expect a connection application to be refused if there are Wind Farms waiting to be built.</p> <p>National Resources Wales</p> <p>a. NRW will be jointly responsible for habitat protection and also benefit from the development. NRW state in their relevant representation (5 June 2015 – Point 11.1 “Land Interest”) that they are responsible for both.</p> <p>i. How can there be no conflict of interest with one Board and one Chief Executive?</p> <p>Summary</p> <p>a. I believe that under grounding of this project would be the least worst option. However, for all of the above reasons it should be refused development consent.</p>	<p>Farms have development consent without "agreed connections".</p> <p>National Policy Statement EN-1 acknowledges that whilst applications for generating stations and related infrastructure should be contained in a single application or in separate applications submitted in tandem, it may not always be possible. This is due to different lead-in times, different legal entities, and different commercial and regulatory frameworks.</p> <p>As set out in SP Manweb's response to the Examining Authority's FWQ 1.9, there is no dispute as to the proposition that planning policy supports the need for an enhanced electricity transmission network which distributes urgently needed electricity generated from renewable sources.</p> <p>In relation to Ms Harman's statement that "[i]t would be naive to expect a connection application to be refused if there are Wind Farms waiting to be built", SP Manweb infers that Ms Harman is asserting that the Secretary of State's decision has been predetermined.</p> <p>The Examining Authority is part of the Planning Inspectorate, an independent statutory agency responsible for operating the planning process for nationally significant infrastructure projects (such as this application for the Proposed Development). The Examining Authority's role is to examine the application, make a report to the Secretary of State on the application setting out its findings and conclusions in respect of the application and its recommendation as to the decision to be made on the application. The Examining Authority's functions must be carried out in accordance with Chapter 4 of the Planning Act 2008.</p> <p>The Secretary of State will be required in these circumstances to have regard to the matters outlined in section 104 of the Planning Act 2008 in deciding whether to grant development consent. These include relevant National Planning Statements, the Local Impact Report of the local authorities and any other matters considered by the Secretary of State to be relevant or important.</p> <p><u>Conflict of interest for NRW</u></p> <p>SP Manweb refers the Examining Authority to its response in relation to NRW's Relevant Representation, as set out in paragraph 4.10.2 of the SP Manweb Response to Relevant Representations Document. This response is replicated below:</p> <p><i>"4.10.2 It is therefore clear that NRW has specific functions and requirements set out in statute. Its role as land agent on behalf of the Welsh Government is separate and independent to NRW's role as a statutory consultee and therefore no conflict of interest exists."</i></p> <p>SP Manweb also notes that NRW has confirmed that any issues affecting the Welsh Government Estate land and the Minister's interests will be dealt with separately by NRW's</p>

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		Energy Delivery team.
<p>Abergele Town Council</p>	<p>I have been instructed to write to you by members of the Town Council with regards to your letter dated 4th August with reference to an application by SP Manweb for an order granting development consent for the North Wales Farms Connection.</p> <hr/> <p>Members of the Council wish for it to be noted that they support the letter sent to you by St Asaph City Council and the other local Community Councils in the locality stating that part of the cables should be installed underground as the Countryside and environment should be protected.</p>	<p>SP Manweb's starting point is its duties under the Electricity Act 1989, being:</p> <p>Section 9 – to develop and maintain an efficient, co-ordinated and economical system of electricity distribution; and</p> <p>Schedule 9 – (a) to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and (b) to do what he reasonably can to mitigate any effect which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p> <p>Whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989). Given that National Policy Statement EN-5 sets a high threshold for refusing overhead lines in favour of undergrounding and TAN 8 explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>SP Manweb, in its design of a connection, looks at the policy guidance in both National Policy Statement EN-1 and National Policy Statement EN-5. The route of a proposed overhead line needs to be assessed considering the following:</p> <ol style="list-style-type: none"> a. Is there a <i>“particularly sensitive location”</i> along the route of the 132kV Overhead Line where the effects of the 132kV Overhead Line in that locality would give rise to <i>“serious concerns”</i>. b. If the answer is in the affirmative, then is this an <i>“exceptional circumstance”</i>, where undergrounding the line would bring <i>“very significant benefits”</i>, which would <i>“clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable”</i>. <p>SP Manweb has addressed the issue of placing the Proposed Development underground in the following documents:</p> <ul style="list-style-type: none"> • The Planning Statement (DCO document reference 7.4) and supporting Technical Appendix (DCO document reference 7.5) look at the need for undergrounding specifically in this location in detail. • SP Manweb’s response to Relevant Representations (SPM NWWFC RR Document 1 submitted as part of SP Manweb’s Deadline 1 Submission) Section 19 provides further information regarding SP Manweb’s decision to route the Proposed Development overhead and the costs associated with placing the development underground. <p>SP Manweb's assessment concludes that the 132kV Overhead Line does not give rise to any major adverse landscape and visual effects (and thus serious concerns, being a test in National Policy Statement EN-5) and does not produce major adverse effects on any</p>

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		cultural heritage assets (and thus substantial harm, being a test in National Policy Statement EN-1). There is, therefore, no justification for any undergrounding in part. Furthermore, the route of the 132kV Overhead Line has been chosen as it minimises the impacts on the environment when compared with the alternative route options.
J. Bradburne Price & Co on behalf of J LL Evans and H LL Evans	<p>We act on behalf of Mr. Huw Ll. Evans, Bryn Hen Farm, Marli, Abergele, Conwy LL22 9ED and write to opposed the proposed development. The items which are of concern to my client are as follows:-</p> <p>It is intended to put the new 132kV electricity line and apparatus above ground. This will impact on the environment and will also have a negative impact upon the visual quality of the area. To counter this, the 132kV line should be buried beneath the ground.</p> <p>There is already a lower voltage 33kV line running across my clients land, together with an 11kV line on the opposite site of the road. If the proposed route is approved, it is intended to bury this lower voltage 33kV line for a length of approximately 420 meters and place the new line above ground. It is also intended to bury the 11kV line on the opposite site of the road. This is a waste of money and it would make more sense to bury the new line. The existing lines have been in place for many years and form an environmental and from an aesthetical point of view they are now accepted into the landscape. The new line will have a far greater impact, especially as it is intended to run over the brow of a hill, which is in very prominent position and can be seen by thousands of homes and businesses below.</p> <p>The proposed position of the new line will have a huge impact on the potential land use of the field. At the present time it is an arable field, but if the proposed apparatus is constructed, the field would only be useful for grazing and its productivity would fall and ultimately it's value would fall too.</p> <p>If the intention is to bury the 33kV line, this will prove very problematic to install, as the ground beneath the intended route is basically rock. However the land beneath the proposed route of the 132kV line is very manageable and therefore it would make more sense to bury this cable instead.</p> <p>If the 132kV cable cannot be buried, then the proposed route takes it right across the middle of the field. Instead it should be located in the hedgerow to minimise disruption to my client's agricultural activities.</p> <p>We feel the position of the poles and stays could be better placed to provide a lower impact on the field. We also feel it would be beneficial to use less poles.</p> <p>It is intended to run the new 132kV line onto and over a hill at the top of my clients field. My client has plans to quarry some stone for his own use from this part of the field. If the new line is constructed, he will be prevented from doing this.</p> <p>We hope you feel the above points are valid, but should you need any point clarified, we will be glad to assist. We would also welcome an "on site" inspection of the land by yourselves, either accompanied or unaccompanied, which we feel will help you gain a clearer understanding.</p>	<p>(1) Undergrounding</p> <p>SP Manweb's starting point is its duties under the Electricity Act 1989, being:</p> <p>Section 9 – to develop and maintain an efficient, co-ordinated and economical system of electricity distribution; and</p> <p>Schedule 9 – (a) to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and (b) to do what he reasonably can to mitigate any effect which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p> <p>Whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989). Given that National Policy Statement EN-5 sets a high threshold for refusing overhead lines in favour of undergrounding and TAN 8 explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>SP Manweb, in its design of a connection, looks at the policy guidance in both National Policy Statement EN-1 and National Policy Statement EN-5 (and the Holford Rules). The route of a proposed overhead line needs to be assessed considering the following:</p> <ol style="list-style-type: none"> Is there a "<i>particularly sensitive location</i>" along the route of the 132kV Overhead Line where the effects of the 132kV Overhead Line in that locality would give rise to "<i>serious concerns</i>". If the answer is in the affirmative, then is this an "<i>exceptional circumstance</i>", where undergrounding the line would bring "<i>very significant benefits</i>", which would "<i>clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable</i>". <p>SP Manweb has addressed the issue of placing the Proposed Development underground in the following documents:</p> <ul style="list-style-type: none"> The Planning Statement (DCO document reference 7.4) and supporting Technical Appendix (DCO document reference 7.5) look at the need for undergrounding specifically in this location in detail. Paragraph 19 of the Response to Relevant Representations provides further information regarding SP Manweb's decision to route the Proposed Development overhead and the costs associated with placing the development underground.

Respondent	Written Representation	SP Manweb Response
		<ul style="list-style-type: none"> • SP Manweb's response to FWQ 8.1 reiterates SP Manweb's position that a wholly underground design cannot be justified given Government policy accepts the need for overhead lines and the relatively higher costs of such a scheme in this case. <p>SP Manweb's assessment concludes that the 132kV Overhead Line does not give rise to any major adverse landscape and visual effects (and thus serious concerns, being a test in National Policy Statement EN-5) and does not produce major adverse effects on any cultural heritage assets (and thus substantial harm, being a test in National Policy Statement EN-1). There is, therefore, no justification for any undergrounding in part. Furthermore, the route of the 132kV Overhead Line has been chosen as it minimises the impacts on the environment when compared with the alternative route options.</p> <p><u>(2) Response to argument that undergrounding the 11kV and 33kV lines is a 'waste of money'</u></p> <p>The cost of undergrounding 132kV cables is significantly more than for 33kV cables (132kV is typically 3 times greater than 33kV cable). The option of undergrounding the 33kV circuits has only been taken where it is not possible for the two overhead lines to cross each other and the necessary safety clearances maintained.</p> <p><u>(3)(a) Impacts on Agricultural uses of the Land</u></p> <p>SP Manweb acknowledges that there may be some temporary adverse impacts on the agricultural activities that may be carried out on the Evans' land as a result of the Proposed Development. As noted in the Response to Relevant Representations (DCO Document Reference SPM NWWFC RR Document 1) at Section 20.4:</p> <p><i>"20.4.1... In order to minimise effects SP Manweb will work closely with landowners to carry out construction works in a way that will reduce the potential disruption. SP Manweb will also work closely with affected landowners to negotiate compensation terms if this is appropriate.</i></p> <p><i>20.4.2. The ES assesses the potential impact of the Proposed Development on Land Use and Agriculture (DCO document reference 6.10). The assessment acknowledges potential effects relating to loss of small areas of operational agricultural land.</i></p> <p><i>20.4.3 In general, overhead line construction does not cause extensive damage, crop loss or disturbance (compared, say, with a cross country gas pipeline). Any damage caused, will be properly reinstated and compensation will be paid for losses arising from the pre-construction and construction works, in accordance with the requirements of the compulsory acquisition compensation code. These effects of an overhead line are experienced on a day to day basis by farmers. Overhead electricity lines are commonly routed across farmland and are experienced by a large number of farmers in the UK."</i></p> <p>In relation to the assertion that the Proposed Development would reduce the use of a field from arable to grazing only, SP Manweb does not agree. The extent of impact on agricultural land would be very limited in that a standard pole footprint where it would be neither practical nor possible to carry out agricultural operations would be a maximum of approximately 40m², or 0.004 hectares which is equivalent to 0.010 acres. This is based on a pole separation of 3 metres, pole diameter of 0.50metres, and a working area buffer of 2 metres. Such a minimal reduction in field working area should not adversely affect agricultural operations to any meaningful extent.</p>

Respondent	Written Representation	SP Manweb Response
		<p><u>(3)b) Property Value</u></p> <p>SP Manweb has responded to comments regarding impact on property values in Section 3 of its Response to Relevant Representations Document (SPM NWWFC RR Document 1) submitted as part of its Deadline 1 submission. In summary, SP Manweb notes that perceptions of impacts on property values are not matters that the Secretary of State would regard as being material, relevant or important to her decision. If the DCO is made by the Secretary of State, compensation will be determined in accordance with the Compensation Code created by the Compulsory Purchase Act 1965, the Land Compensation Acts 1961 and 1973 and case law. Compensation may be payable in respect of (among other things) decrease in market value of the land, disturbance loss.</p> <p><u>(4) and (5): Alternative Route</u></p> <p>SP Manweb has been engaging with landowners and other interested parties in relation to suggested amendments to the design of the Proposed Development. Suggestions from landowners and occupiers, including J LL and H LL Evans, with potential amendments have been subject to a detailed review process. The review process is a forensic exercise, as one pole location change has implications for the rest of the linear line, which in turn potentially has knock on effects for other landowners. SP Manweb has considered these suggestions, taking into account engineering, environmental and land ownership constraints. It has collated all responses and where it has been able to accept the suggested amendments it has done so.</p> <p>An application has been submitted to the Secretary of State on 11 September 2015 requesting that the Secretary of State accept a refined line design incorporating those landowner suggestions (called "Option B").</p> <p><u>(6) Position and number of poles</u></p> <p>SP Manweb refers to section 8.3 of the Response to Relevant Representations Document (SPM NWWFC RR Document 1) for a detailed response to the design evaluation process undertaken to determine the number and positions of the poles. SP Manweb notes that some parties are calling for the earth wire to be undergrounded, and the double wood pole structures to be reduced to single wood poles. However, in this scenario, the number of wood poles would be increased in order to carry the weight of the conductors. Therefore, this option was discounted not only on the cost of undergrounding the earth wire along the whole length, but also due to the impact of an increase number of poles.</p> <p>Regarding the Evans' suggestions, in conjunction with discussions with the land-agent, SP Manweb has examined whether it could remove the stays from pole 216 on the Evans' land. However, this would require an additional new pole in the alignment. "Option B" that has been submitted to the ExA on 11 September 2015, includes this change and the additional new pole 216B (which replaces the stays on pole 216).</p> <p><u>(7) Impacts on potential to use the land for quarrying</u></p> <p>If stone is to be quarried in the proximity of an overhead line the work will be subject to HSE Guidance Document GS6 that sets out relevant safety requirements. In this instance it will restrict the amount of stone that can be quarried in an area adjacent to the line with a maximum width of 21 metres (this is the width at mid-span with the conductors at maximum swing) within which the restrictions may vary from no excavation of stone around pole</p>

Respondent	Written Representation	SP Manweb Response
		<p>positions to restricted working practices and a limit on the depth of excavation away from the pole structures. This means that together with other areas of the holding where stone has been and can be extracted, it is very unlikely that insufficient stone cannot be quarried to satisfy the requirements for the holding. If these restrictions did have an impact upon the value of the field, this may be the subject of compensation assessed in the normal way in accordance with the Compensation Codes although it is anticipated any compensation will be de-minimus compared to the additional cost of undergrounding this section of the overhead line.</p> <p>It is noted that both Conwy Borough County Council and Denbighshire County Council consider that the impact on safeguarded minerals would have a "<i>limited impact</i>" (CBCC response to FWQ 1.8) and "<i>no significant impact</i>" (DCC Local Impact Report, paragraph 16.4) respectively.</p> <p><u>(8) Inspection of land</u></p> <p>SP Manweb thanks the Evans for suggesting locations for the Examining Authority to carry out a site inspection.</p>
<p>John Hopkinson</p>	<p>I disagree with the presumption that there is a need for this connection. I make this written representation as an electricity consumer, in the knowledge that it is HM Government's wish to reduce the effect on the bills of hard-working citizens of renewable energy subsidies of all types</p> <p>If the North Wales Wind Farms Connection is allowed to be built, the adverse financial impact on electricity consumers will be severe. All costs, direct and indirect, of electricity generation and transmission fall ultimately on the consumer. As well as the costs of the connection itself (queried by the Panel at, for example, Q 1.17), the 'subsidies' to wind farms, be they through ROC payments (or other mechanisms) and constraint payments are well known. Less well known are the costs which will fall on consumers from, firstly, the smart meter programme, and secondly the costs of making the National Electricity Grid robust as more non-synchronous generation (NSG), such as wind generation, is connected. The downsides of having more NSG are examined in National Grid's System Operability Framework document of September 2014, and National Grid warns (in the High level overview) that "The impact of this change will be mainly on how we control some of the system parameters such as voltage, and frequency, and with the existing measures they will become more challenging (and potentially expensive) to manage."</p> <p>Constraint payments to wind generators, according to data published by The Renewable Energy Foundation, have passed the £2million/day mark, as for example on 6th June 2015; the smart meter programme costs have escalated to be now in excess of £11,000,000,000.</p> <p>The Panel will be aware that wind generation is unreliable and intermittent and it follows that it cannot be scheduled to meet expected demand. The Electricity Supply Industry (ESI) hopes to combat this fundamental shortcoming by influencing demand dynamically, deploying 30 million smart electricity meters, for which the consumer must pay.</p> <p>This is misguided; experience in Canada shows that penalty charges in excess of 2½ times 'normal' rates have to be imposed to make a measurable difference to demand,</p>	<p>Mr Hopkinson's submission concerns two matters:</p> <ol style="list-style-type: none"> 1. increased costs to the consumer resulting from the Proposed Development 2. the need for the Proposed Development. <p>1. Costs to the consumer.</p> <p>SP Manweb has a statutory duty to provide and maintain an efficient, co-ordinated and economical system of electricity distribution (section 9 of the Electricity Act 1989). SP Manweb has to balance this duty with its Schedule 9 duty to mitigate effects which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p> <p>SP Manweb has complied with these duties in designing the 132kV Overhead Line. SP Manweb notes that Denbighshire County Council at paragraph 3.2.6 of its Written Representation states that it "<i>accepts the approach taken to the development of route corridors and the selection of a preferred route is appropriate, and [that it recognises] that following a public consultation, the preferred route was amended to pass further to the west of Henllan to address particular concerns.</i>" This acceptance acknowledges that SP Manweb has looked at the alternatives in accordance with the Electricity Act 1989, National Policy Statements EN-1 and EN-5 and the Holford Rules.</p> <p>2. Proposed Development Need</p> <p>SP Manweb has a statutory duty to connect generating assets when requested. Following the termination by Vattenfall Wind UK of its connection agreement with SP Manweb, SP Manweb has a duty to connect three Wind Farms, all of which have planning permission (and in the case of Clocaenog Forest, a Development Consent Order) and connection agreements. Accordingly, SP Manweb is under a statutory duty to find a connection solution, such solution to be in accordance with section 9 and Schedule 9 of the Electricity Act 1989. The Proposed Development addresses the operational need so that electricity</p>

Respondent	Written Representation	SP Manweb Response
	<p>and that such penalties are politically unacceptable. In this country, the Institute of Directors (their report published on 27th March 2015) has come down heavily against the smart meter programme.</p> <p>Far from there being a need for the North Wales Wind Farms Connection, to allow it to be built would result in very significant extra costs to fall on consumers. Electricity generated by wind in the UK (and excluding embedded generation) has already, at times, reached 22% of demand (e.g. on 23rd August 2015) and prudence requires that there should now be a 'wait and see' period before adding any further wind generation onto the National Electricity Grid.</p> <p>Should the Panel wish, I would be prepared to expand on this written representation at an Open Floor Hearing, and be subjected to oral questioning by the Panel, and indeed to cross-questioning by others.</p>	<p>generated at the wind farms can be exported.</p> <p>The need for new renewable electricity is clearly set out in National Policy Statements EN-1 and EN-3. Whilst the Proposed Development does not itself generate electricity, it does provide the connection of renewable generation which is crucial to the Government achieving its desired energy mix and security of supply. The Proposed Development is therefore compliant with the objectives of the Government's policy on the energy mix to be delivered and regarding achieving and maintaining a secure and reliable supply of electricity.</p> <p>It is noted that Conwy Borough County Council accepts the need for the Proposed Development (see its response to FWQ 1.9) and Denbighshire County Council also does not challenge the need for the connection (see paragraph 17.1.1 of its Local Impact Report).</p>
<p>Meirick LI Davies</p>	<p>I oppose electricity cables on Pylons from Clocaenog Forest, Saron, to the south of Glascoed Road, Cefn Meiriadog, St Asaph LL17 to connect with the National Grid overland rather than underground. As the County Councillor for Cefn Meiriadog and Trefnant I appeal to you to protect the breath-taking landscape and beauty of the Elwy Valley for coming generations as the heritage of my children and my children's children.</p> <p>1) Visible cables should be placed underground from the Elwy Valley to the South/West of Glan yr Afon, along the edge and further on past the historic listed building "Berain" (former home of Catrin of Berain). From the Elwy to the North/East, along the edge past Coed y Fadir, past Plas Newydd and Plas Hafod, past Plas Newydd Woods to the top of Bryn Meiriadog alongside Lôn Werdd/Ceffyl, where it is said that it is supposed to go underground down towards Groesffordd Farm and to the Sub-station behind the old Pilkington Glassworks, Cwttir Lane. The line on top of Bryn Meiriadog will be visible against the skyline, which is totally unacceptable. There are some smaller lines currently crossing the fields, and more and larger ones will make the land unsightly.</p> <p>2) The line should be placed underground in order to conserve the unspoilt natural beauty that has existed for generations. It was stated by Edward Pugh 1763-1813, world-famous Artist and Author from Ruthin, who after 9 years of work and thorough research across Wales, published "Cambria Depicta". In that masterpiece he stated that there is no better place for an Artist to work than in the Elwy Valley. He states: ""The character of the place is unlike any other I have seen; although it does not resemble the wild landscapes of Snowdonia, it still has a greatness of its own, and if treated correctly, will be as beautiful as any there; and though it may not compare with the valleys of Merioneth, it excels upon the most wonderful similar places that came to my attention in Montgomery." He saw that there was no better place for an Artist to work on his masterpiece than in the Elwy Valley.</p> <p>3) Found nearby also is Plas Hafod a historic Grade II* listed dwelling, also Plas Newydd, and the cables, and the obtrusive metal and pole structures proposed would destroy the landscape that is to be seen near the historic setting of Plas Newydd. This would be worse again near Berain, the home of the famous Catrin of Berain.</p> <p>4) I note that existing electricity cables that cross the proposed line are to be placed underground and also the line on the Clwyd Valley side from Bryn Meiriadog to the Sub-Station, Cwttir Lane, St Asaph. Therefore, why not place the new line in its entirety</p>	<p>Points (1), (2),(4) and (6) Undergrounding</p> <p>When considering new connections, SP Manweb's starting point is its duties under the Electricity Act 1989, being:</p> <p>Section 9 – to develop and maintain an efficient, co-ordinated and economical system of electricity distribution; and</p> <p>Schedule 9 – (a) to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and (b) to do what he reasonably can to mitigate any effect which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p> <p>After SP Manweb's statutory duty, SP Manweb must look at the National Policy Statements for Energy. First, the Overarching National Policy Statement for Energy, NPS EN-1, sets the context for references to undergrounding in NPS EN-5, where section 3.7 deals with the need for new electricity infrastructure and specifically acknowledges in paragraph 3.7.1 that new networks will be needed for wind farms. Following reference to strategic network planning, paragraph 3.7.10 of EN-1 then notes there is an urgent need for new electricity lines at 132kV and above. It is acknowledged in the same paragraph that there will be more than one technological approach to connect the network such as overhead lines or underground cables and the costs and benefits of these alternatives should be properly considered, as set out in NPS EN-5, before any overhead line is consented. It is further noted that section 4.4 of EN-1 refers to the need for considering alternatives to the Proposed Development.</p> <p>Section 5.9 of EN-1 deals with the generic landscape and visual effects of new electricity infrastructure and explains how the effects on locally valued landscapes should be addressed. Paragraph 5.9.14 notes that outside nationally designated landscapes there may be some landscapes that are highly valued locally and protected by designation, although local landscape designations should not in themselves be used to refuse consent as this may unduly restrict acceptable development. Paragraph 5.9.15 notes that it is the role of the IPC (now the Examining Authority and Secretary of State for Energy and Climate Change) to judge whether any adverse landscape impact would be so damaging that it is not offset by the benefits (including need) of the project.</p> <p>In paragraph 5.9.21 of EN-1 there is reference to mitigation and it is acknowledged that there may be "exceptional circumstances" where reducing the scale or design of a</p>

Respondent	Written Representation	SP Manweb Response
	<p>underground.</p> <p>5) High praise is given to the lower part of the Elwy Valley in a description by the Clwyd-Powys Archaeological Trust "The boundaries of this landscape are delineated by the Elwy Gorge as it surrounds Cefn Meiriadog, a low ridge on the eastern fringes of the Rhos Hills in northern Denbighshire". This is an excellent description of the unspoilt natural landscape of the Elwy Valley which the electricity company is trying to deface and spoil with poles and metal structures to carry the Electricity from Clocaenog to Cwttir Lane. They can be placed underground as is necessary with Oil, Water or Gas lines that already cross the parish.</p> <p>6) The offshore Wind Farm Gwynt y Môr off Abergele and Llandudno has cables buried underground from the Sea to the Sub-station south of Derwendeg, Glascoed Road in the Parish of Cefn Meiriadog. There is a "Burbo Bank" near the mouth of the Mersey, Wirral, with cables buried underground from the Sea taking electricity to a new Sub-station to the south of Ty'n Caeau, Glascoed Road, which are around 400 yards apart, all underground. I cannot see why SP Manweb refuses to place the cables underground all the way from Clocaenog to the Sub-station near Cwttir Lane, like the two above Companies. An additional pipeline could be placed to the Sub-station near Cwttir Lane like the two above Companies. An additional pipeline could be placed for future use, instead of overland, where necessary, should the power of the Wind Turbines increase, new stronger cables could be installed from one end to the other in the empty pipeline.</p> <p>7) Once the proposed Pylons have defaced, spoiled and destroyed the beautiful, unspoilt natural views we have of the wonderful Elwy valley, and other places, it will not be possible to restore it or to conceal the madness of the mistake made in bending to the soulless capitalists, and allowing the strong to take possession of the sacred land that has been given to us mortals to look after. By placing the cables underground, nature will restore the damage and remove it very quickly, the turf be will over them and they will no longer be seen or remembered.</p> <p>I greatly trust that common sense and a love for God's Creation will triumph over human profit.</p>	<p>project to mitigate landscape and visual effects may have a "very significant benefit" which may warrant any consequent loss in function.</p> <p>National Policy Statement EN-5 (Electricity Networks Infrastructure) at section 2.8 considers undergrounding in the context of the landscape and visual effects of electricity network infrastructure. In paragraph 2.8.2, it is noted that the placing of overhead lines is generally not incompatible with developers' statutory duty under section 9 of the 1989 Act.</p> <p>Paragraph 2.8.2 also states that:</p> <p><i>'For the most part, these impacts [adverse landscape and visual impacts] can be mitigated, however at particularly sensitive locations the potential adverse landscape and visual impacts of an overhead line proposal may make it unacceptable in planning terms, taking account of the specific local environment and context.'</i> (our emphasis)</p> <p>Paragraph 2.8.8 then states that:</p> <p><i>"Where there are serious concerns about the potential adverse landscape and visual effects of a proposed overhead line, the [Secretary of State] will have to balance these against other relevant factors, including the need for the proposed infrastructure, the availability and cost of alternative sites and routes and methods of installation (including undergrounding)."</i> (our emphasis)</p> <p>Government policy on undergrounding is continued in paragraph 2.8.9 which states:</p> <ul style="list-style-type: none"> - the impacts and costs of both overhead and underground options vary considerably between individual projects The Government expressly states that it has not laid down any general rule about when an overhead line should be considered unacceptable – therefore each case is different. - consent for overhead lines should only be refused in favour of an underground cable if it is satisfied that the benefits from the non-overhead line alternative will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable. In this context, the guidance makes express reference to : <ul style="list-style-type: none"> (a) the impact on residential areas, and those of natural beauty or historic importance such as National Parks, AONBs and the Broads); (b) additional cost of any undergrounding. <p>Taking all of the above, it is clear that whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989).</p> <p>This is acknowledged in the National Policy Statements as well, with EN-5 at paragraph 2.8.2 making it clear that the Government does not consider that the placing of overhead lines is generally not incompatible with developers' statutory duty under section 9 of the 1989 Act. Furthermore, EN-5 sets a high bar for refusing overhead lines in favour of undergrounding (paragraph 2.8.9). In the context of Wales, TAN 8 itself explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>Given the cost of a wholly underground option would be £59.9M, which is 1.7 times more than that of an overhead line option, a wholly underground option is therefore not supported in statute or policy.</p>

Respondent	Written Representation	SP Manweb Response
		<p>In designing the 132kV Overhead Line, SP Manweb has given careful consideration to what it can do to mitigate the effects of the 132kV Overhead Line on natural beauty and to minimise harm to the landscape and cultural heritage, providing reasonable mitigation where possible and appropriate (in accordance with SP Manweb's duties in the Electricity Act 1989 and paragraph 5.9.8 of NPS EN-1). The routing options that SP Manweb considered are set out in the Strategic Options Report (DCO Document Reference 7.3) which outlines the alternative route options considered and why they were discounted. The Consultation Report (DCO Document Reference 5.1) also sets out the reasons for the selection of the Hafod Route Option following consultation and assessment of the environmental and technical issues.</p> <p>Having chosen the route, the next step is to consider whether there is a “<i>particularly sensitive location</i>” along the route of the 132kV Overhead Line and whether the effects of the 132kV Overhead Line in this locality would give rise to “<i>serious concerns</i>”. If it is concluded that it would, then is this an “<i>exceptional circumstance</i>”, where undergrounding the line would bring “<i>very significant benefits</i>”, which would “<i>clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable</i>”.</p> <p>Regarding undergrounding any part of the 132kV Overhead Line, the Environmental Statement concludes that the 132kV Overhead Line does not give rise to any major adverse landscape and visual effects (and thus serious concerns). There is, therefore, no justification for any undergrounding in part. Furthermore, the route of the 132kV Overhead Line has been chosen as it minimises the impacts on the environment when compared with the alternative route options.</p> <p>In relation to the specific suggestion on undergrounding, the cost of undergrounding is between £59.9M and £71.3M for the whole route, compared to £35.8M for the OHL option.</p> <p>In relation to the comments regarding the underground cables in relation to the offshore wind farm Gwynt y Môr, the specifics of any particular routing of cables is subject to the particulars of the connection. Differences like connection voltage, power flow, environmental impact and ground conditions will a materially affect the choice of technology employed. SP Manweb cannot comment on the designs used for other windfarms. SP Manweb has carried out a specific exercise for the NWWF connections and considers that through its routing studies and consultation, it has chosen a route that minimises the impact on of the Proposed Development on the environment.</p> <p>Points (2), (5), (7) - Landscape and Visual Impact</p> <p>In relation to the specific points raised about undergrounding the cables near Berain, please refer to SP Manweb's comments on CCBC's LiR (Ground A at 6.3.3 of CCBC's LiR).</p> <p>M. Ll. Davies suggestion is for the Proposed Development to be undergrounded in its entirety from Berain northwards. This section passes through four LANDMAP Visual and Sensory Aspect Areas (VSAAs).</p> <ul style="list-style-type: none"> • Limestone Valley – Cefn • Upper Elwy Valley • Afon Elwy Valley – East • Llanefydd Lowlands <p>Appendix 7.4 (DCO Document Ref 6.20.4) presents the findings of the evaluation of each VSAA together with an assessment of the predicted effects of the 132 kV Overhead Line</p>

Respondent	Written Representation	SP Manweb Response																														
		<p>on landscape character (as per the methodology in Section 7.4), as follows:</p> <ul style="list-style-type: none"> • Evaluation of the sensitivity (value and susceptibility); • Assessment of the magnitude of landscape effect (size/ scale of effect and geographical extent); and • Overall judgement of the significance of landscape effects. <p>The results presented in Appendix 7.4 are summarised in table 7.18 of Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7). The following is an extract from this table.</p> <table border="1" data-bbox="1567 575 2694 1184"> <thead> <tr> <th>Area</th> <th>VSAA</th> <th>Sensitivity</th> <th>Magnitude of Effect</th> <th>Overall Significance of Landscape Effects</th> <th>Significant Landscape Effects</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>Llanefydd Lowlands</td> <td>Medium-high</td> <td>Small-Medium</td> <td>Moderate</td> <td>✓</td> </tr> <tr> <td>8</td> <td>Afon Elwy Valley – East</td> <td>Medium-High</td> <td>Medium</td> <td>Moderate</td> <td>✓</td> </tr> <tr> <td>9</td> <td>Upper Elwy Valley</td> <td>High</td> <td>Medium</td> <td>Moderate</td> <td>✓</td> </tr> <tr> <td>10</td> <td>Limestone Valley – Cefn</td> <td>Medium-high</td> <td>Small-Medium</td> <td>Moderate</td> <td>✓</td> </tr> </tbody> </table> <p>The conclusion to the landscape assessment presented in paragraph 7.7.48 of Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7) notes that:</p> <ul style="list-style-type: none"> • the localised parkland character of parts of the landscape of the Llanefydd Lowlands would experience a moderate effect; • the landscape of the Afon Elwy Valley (Afon Elwy Valley – East and Upper Elwy Valley) would experience a moderate effect; and • the landscape of the Cefn Meiriadog Ridge (Limestone Valley – Cefn) would experience a moderate effect which would be significant, albeit on the low side of moderate. <p>Although significant, these effects were assessed as moderate; with none assessed as major.</p> <p>SP Manweb's approach to assessing the requirement for undergrounding based on the outcome of the assessment is presented in the Appendix to the Planning Statement (DCO Document Ref 7.4).</p> <p>Further discussion on the approach is presented in Section 19.3 of SP Manweb's response to the Relevant Representations (RR Document 1). It is also discussed in SP Manweb's responses to paragraphs 6.2.1 (ii) and 6.2.5, and 4.10 – 4.14 of Conwy County</p>	Area	VSAA	Sensitivity	Magnitude of Effect	Overall Significance of Landscape Effects	Significant Landscape Effects	5	Llanefydd Lowlands	Medium-high	Small-Medium	Moderate	✓	8	Afon Elwy Valley – East	Medium-High	Medium	Moderate	✓	9	Upper Elwy Valley	High	Medium	Moderate	✓	10	Limestone Valley – Cefn	Medium-high	Small-Medium	Moderate	✓
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Respondent	Written Representation	SP Manweb Response
		<p>Council's Landscape Impact Report.</p> <p>Section 16.3 of SP Manweb's response to Relevant Representations (RR Document 1) summarises the approach to route selection and undergrounding as follows:</p> <p><i>"16.3.14 A route for the Proposed Development has been selected which as far as possible accords with the Holford Rules and minimises effects on the landscape and on views and visual amenity. Routeing decisions have been strongly influenced by consideration of potential effects on landscape, views and visual amenity and reasonable, proportionate and appropriate embedded and secondary mitigation measures have been taken to reduce the landscape visual and visual amenity effects of the 132kV Overhead Line.</i></p> <p><i>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. There is no definition of "serious concerns", but SP Manweb has previously interpreted this term to mean adverse significant landscape and visual effects that are over and above that expected for this type of project. In the context of an overhead line, this is taken to be a major adverse effect as identified in the ES for the Proposed Development.</i></p> <p><i>16.3.16 SP Manweb sees this as a reasonable interpretation given Government policy as set out in the context of EN-5 which accepts overhead lines can be compliant with licence operators' obligations to preserve environmental amenity.</i></p> <p>SP Manweb's response to First Written Question 1.4 explains how, in accordance with Overarching National Policy Statement (EN-1), careful routeing and choice of infrastructure has avoided or minimised potential effects of the Proposed 132kV Overhead Line on the landscape. Although some significant landscape residual effects are likely to arise, these are localised and have been assessed as moderate. No landscape residual effects are assessed as major for the Proposed Development alone or for combined cumulative effects.</p> <p>The secondary measures proposed, including hedgerow reinforcement and new hedgerow trees, would maintain and in time enhance a strong landscape framework which will help to visually absorb the line and lessen its landscape effects.</p> <p>Where visual effects have been judged to be significant, SP Manweb has developed a range of specific mitigation measures. These are summarised in Table 7.23 (DCO document reference 6.7), and presented in Figure 7.23 of the ES (DCO document reference 6.16). Additional detail is provided in Appendix 7.6 of the ES (DCO document reference 6.20).</p> <p>Whilst there are a number of significant moderate landscape and visual effects, including cumulative landscape effects, the level of significance of these effects does not give rise to serious concerns. Accordingly, it is SP Manweb's contention that undergrounding is not an appropriate mitigation measure in respect of the Proposed Development.</p>

Respondent	Written Representation	SP Manweb Response
		<p>Point (3) Historic Environment</p> <p>In relation to this matter, SP Manweb refers to and adopts its submissions set out in:</p> <ol style="list-style-type: none"> its response to CCBC's LiR (Ground A at 6.3.3), Chapter 8 'Historic Environment' of the ES (DCO Document Reference 6.8), FWQ response 2.8, and Section 5 of the Relevant Representations in relation to the potential historic environmental impacts on Berain; and section 5.6 of SP Manweb's Response to Relevant Representations (DCO Document SPM NWWFC RR Document 1) regarding potential impacts on Plas Newydd. <p>It is also noted that Denbighshire County Council in its LiR at paragraph 9.2.3 considers that the impact on Plas Newydd would be moderate/slight with the impact on the historic environment overall being neutral.</p>
<p>Iwan Wynne Jones</p>	<p>As joint-owner of the land where posts 109 and 110 (A543 viewpoint 11) are located, I wish to make the following points.</p> <p>(1) The development crosses the A543 in a very open location where the posts will be highly visible when driving on the A543 from Denbigh to Groes and in the opposite direction. Thousands use this road every week and the development will destroy the view in the very spot where there is an extensive view in four directions. The road is considered by a number of organisations as one of the 10 best routes in Britain, partly due to the views.</p> <p>Further to our previous communications, a series of emails with proposed amended scheme plans appertaining to our Landowner clients were received, on the afternoon on Friday 21st August 2015, in respect of Scottish Power [being we interpret the detail referred to in the letter from Pinsent Masons to the Planning Inspectorate on 24th July 2015 (as specified under the heading "Revisions to application documents" in the Rule 8 letter dated 4th August 2015)].</p> <p>(2) When travelling towards Denbigh, it will destroy the view of the Clwydian Hills Area of Outstanding Natural Beauty; one wind turbine is already visible on nearby land and the posts and cables will add to the creation of a more industrial appearance to the area. The wind farms are visible in the distance from the other direction and once again this will add to a more industrial view. The posts installed near the Denbighshire and Conwy County signs are a poor advert for both counties; as the posts are located close to the summit of a small hill on open ground they are highly visible.</p> <p>(3) To try to mitigate some of the visible effects of the development the plans note the planting of trees in the hedges along the A543 and nearby fields. These trees will cause the following problems -</p> <ul style="list-style-type: none"> - Dangers for traffic trying to join the A543 from existing accesses that will be unsighted due to the trees. - The trees are to be planted where there have been a number of accidents, and people depend on being able to see well in front before overtaking; it will not be possible to see clearly after the trees have been planted. - There is a problem of flooding on the road at this point and the tree leaves will add to 	<p>Points (1) and (2) Landscape and Visual Impacts</p> <p>Please refer to SP Manweb's response to Conwy County Council's Written Representation 6.2.8 and Section 4 Amplification of the Ground B Objection (4.10 – 4.14) which assesses the likely effects on views from the road, particularly as illustrated by Viewpoint 11, which presents a south westerly view from near Beacon Hill.</p> <p>Two of the wood pole structures would be visible in the foreground as they oversail the road and the overall significance of effect on road users at this location is considered to be at the upper end of moderate. These effects would however be transient and typically experienced only briefly as this is a fast moving section of the A543. Although this viewpoint presents a view from the road when travelling towards Groes, the effects on roads users travelling in the opposite direction towards Denbigh are likely to be similar in magnitude and significance. Specific mitigation measures proposed to reduce the impacts at viewpoint 11 are to make improvements to existing hedgerows and to carry out hedgerow tree planting along road and field boundaries.</p> <p>Point (3) - Impacts of proposed landscaping</p> <p>Plan 6 of the Landscaping Plans (DCO Document Re 2.60) shows an area of mitigation planting comprising hedgerows with tree planting close to where the Proposed Development oversails the A543. Requirement 5 of the draft DCO provides that no stage of the Proposed Development may be carried out until a written landscaping scheme is approved by the relevant planning authority which is generally in accordance with the outline landscape management plan (which refers to the Landscaping Plans), Any consultation required of the highways department will be taken before submission and by the relevant planning authority during the approval process.</p> <p>Point (4) - agricultural land use impacts</p> <p>Landscaping plans Sheet 7 (EIA document reference 2.6.7) and Sheet 8 (EIA document reference 2.6.8) detail the woodland and hedge planting plans adjacent to and near the A543 referred to by Ms Jones. All of the planting proposed in these areas are adjacent to field boundaries or existing hedge lines. That is, they will not impinge upon the main working areas of agricultural fields.</p> <p>Further, it is a generally accepted agricultural principle that trees and woodland can make a</p>

Respondent	Written Representation	SP Manweb Response
	<p>the problem of having drains that are already unable to deal with the flow.</p> <p>- In planting trees on the side of the road people will not be able to see the views from the road and this will affect people's enjoyment of the route.</p> <p>(4) As landowners, we have not seen any work that indicates the effect of the costs of maintaining these trees on the roadsides which could run into thousands, nor any research into the negative effects on agricultural land in planting trees.</p> <p>(5) In 2014, SP Manweb stated in a report 'a number of studies are underway to see if a lighter single wood pole design would be suitable. SP Manweb consider there to be no material difference between the two designs and present the double wood pole throughout the consultation as a 'worse case' illustration. SP Manweb are not consulting on the wood pole design, this will be chosen on technical feasibility'. I would like to know, following the decision of one wind power company not to proceed, whether SP Manweb has considered this and what the results were of the 'studies' that took place.</p>	<p>positive contribution to agriculture, including providing shade and shelter, prevention of erosion, protection of water resources, as well as having conservation and wildlife benefits.</p> <p>Point (5) - Pole design</p> <p>The double wood pole design is required not only to carry the earth conductor, but also to carry the 300sqmm UPAS conductors. The Design and Construction Report (DCO document reference 7.1) paragraph 2.2.21 sets out the need to support the 300sqmm UPAS conductors. It states</p> <p><i>"The proposed design can support a conductor with a nominal cross sectional area of up to 300mm². In this instance a 300mm² conductor (referred to as "Upas") providing a summer rating of 176MVA is necessary to meet the generation capacity of the four wind farms."</i></p> <p>The double wood pole design is required to support the 300mm² conductor and carry the earth wire as the weight and tension of the conductor is such to require double poles. Accordingly, it is not just the earth wire that necessitates the double wood poles, but the conductors.</p> <p>If a single pole design was implemented, this would require a considerably reduced span length to accommodate the higher weight and tension of the conductors. This would result in a significant increase in the number of pole positions, which would have consequential detrimental impacts on landowners and the public. For these reasons the single wood pole design has not been used.</p>
<p>Mari Roberts</p>	<p>The results of SP Manweb's primary and desk studies lack detail and are a mis-representation of the areas' landscape, wildlife and environment. Their ecological and environmental observations are an overview of the route and appear vague and lacking in detail. I for one know that these primary studies have not been conducted accordingly and corners have been cut. For instance, the Hafod dingle valley, part of my land where the proposed line crosses, has not been investigated on foot. This section of the route is an area of significance in terms of the wildlife that habitat here, the landscape, and other natural features. This area of woodland is a significant habitat for many wildlife species and contains other natural features such as a waterfall and a historic cave. This area of the dingle valley where the line supposedly crosses consists of an 80m drop. A proposal of this magnitude would have a detrimental impact on wildlife here and the isolated landscape.</p> <p>SP Manweb's application has effectively dismissed many ecological and environmental effects as being insignificant, based on their own subjective analysis. This is a complete contradiction to my knowledge.</p> <p>Pylons are a negative externality to all the residents of this area who receive no benefit from the proposed development.</p> <p>Overhead lines and pylons cause a significant blight to property values, up to 20% in some cases where pylons can be seen from the residence. My property/farmhouse is identified by SP Manweb under the assessment of Cumulative Residential Amenity Effects as significantly affected by the proposal. For me personally, and for the sake of my family's future, this could potentially be a financial burden. From the business perspective, pylons and overhead cabling pose significant issues. Pylons take up valuable land and they will have an impact on farming decisions concerning the use of land from season to season. They will restrict my flexibility in terms of what I can do on</p>	<p><u>Landscape and Visual / Ecology</u></p> <p>The studies which have been undertaken as part of the EIA process have all been carried out in accordance with relevant guidance and legislation. In terms of landscape and visual, this is explained in SP Manweb's Response to Relevant Representations (RR No. 13, 39, 88and 90), Section 16.11 (iv) (DCO Document Reference SPM NWWFC RR Document 1).</p> <p>It is also noted that NRW has stated in its Written Representation that they '<i>consider the methods used in the Landscape and Visual Impact Assessment to be appropriate, compliant with current guidance and [we] concur with the assessment of residual effects</i>'.</p> <p>The methodology for the Ecological Impact Assessment is set out in Chapter 6 of the ES 'Ecology and Biodiversity' (DCO Document Ref 6.6). NRW has stated in its Written Representation at paragraph 3.8.1 that: '<i>in our view the content of Environmental Statement Chapter 6 is sufficient to inform decisions concerning methods and procedures needed to protect nationally and internationally protected species</i>'.</p> <p>The woodland at Hafod Dingle has been identified and considered within Chapter 6 'Ecology and Biodiversity' of the ES (DCO Document Ref 6.6)</p> <p>Paragraph 10.7 of SP Manweb's Responses to Relevant Representations (DCO Document Reference SPM NWWFC RR Document 1) considers the effect on Hafod Dingle Valley. Mitigation measures would be implemented in this area, including undertaking works during the winter months which would benefit regrowth and timing the works around species such as dormice, great crested new and breeding birds. SP Manweb notes that NRW, whose remit is to ensure that the environment and natural resources of Wales are sustainably maintained, has not objected to the Proposed Development and considers that the Proposed Development is unlikely to have significant adverse impacts on the components</p>

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	<p>my own land. There are also issues concerning health and safety, specifically when livestock are grazing in fields containing pylons and when agricultural machinery are being used to conduct essential land maintenance work.</p> <p>There are no areas along the route suitable for pylons. SP Manweb has dismissed the underground option on the basis that "the costs of a fully underground solution were unacceptable and therefore this was not taken forward". However, the cost of the overhead line is not presented and so it is impossible to determine the incremental cost of undergrounding, and there is no transparency in their cost-benefit calculation. Energy losses are up to 50% less by undergrounding. Both Conwy and Denbighshire County Councils have passed motions for full undergrounding; this being a policy in Conwy.</p>	<p>of the environment within its remit, which includes ecology.</p> <p><u>Lack of Benefits to Residents</u></p> <p>SP Manweb considers that the Proposed Development will deliver benefits to the community as users of an enhanced electricity network distributing urgently needed electricity generated from renewable sources. National Policy Statement EN-1 at paragraph 3.7.3 states explicitly that "...<i>electricity network infrastructure....provide crucial national benefits, which are shared by all users of the system.</i>" SP Manweb refers to paragraph 17.5 of the Response to Relevant Representations.</p> <p><u>Impact on Property Value</u></p> <p>As set out in paragraph 3.4 of the Response to Relevant Representations, SP Manweb notes that perceptions of impacts on property values are not matters that the Secretary of State would regard as being material, relevant or important to her decision.</p> <p>If the DCO is made by the Secretary of State, compensation will be determined in accordance with the Compensation Code created by the Compulsory Purchase Act 1965, the Land Compensation Acts 1961 and 1973 and case law. Compensation may be payable in respect of (among other things) decrease in market value of the land, disturbance loss and the matters outlined in section 3.3 above. As such, this issue is a matter which</p> <p>SP Manweb regards as having been fully responded to in this document and SP Manweb considers that this is therefore not an issue that should require further consideration at Examination.</p> <p><u>Impact on Agricultural Use of the Land</u></p> <p>The Proposed Development has been designed to minimise the number of poles required, whilst ensuring compliance with SP Manweb's specification for overhead lines of the kind proposed. One of the reasons this approach is taken is to minimise the effect on agriculture.</p> <p>As set out in section 2 of the Response to Relevant Representations (SPM NWWFC RR Document 1), it is acknowledged that there will be a permanent loss of some agricultural land arising from the footprints of the poles. The extent of land required for this purpose will be relatively minor compared with the overall area of the agricultural land holdings. Mitigation for financial loss associated with the loss of agricultural land is set out in paragraph 3 of the Response to Relevant Representations.</p> <p>SP Manweb considers that the likely significant effects of the Proposed Development on agricultural land uses (specifically pasture for grazing and arable land) will be minor. In terms of impacts on agricultural operations, it is considered that these will also be minor because they will be limited to impacts arising from the loss of agricultural land within the footprints of the electrical poles and stays.</p> <p>The outline CEMP requires SP Manweb to liaise with owners and occupiers to ensure that disruption to farming activities is kept, where possible, to a minimum, The outline CEMP also requires working areas to be fenced off from animals to ensure they are kept at a safe distance. SP Manweb refers to its responses to FWQs 3.28, 4.1 and 4.7.</p> <p>SPM Manweb considers that it is not plausible that in the vast majority of cases the Proposed Development would reduce the use of a field from arable to grazing only. A standard pole footprint where it would be neither practical nor possible to carry out</p>

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		<p>agricultural operations would be a maximum of approximately 40m², or 0.004 hectares which is equivalent to 0.010 acres. This is based on a pole separation of 3 metres, pole diameter of 0.50metres, and a working area buffer of 2 metres. Please refer to the Design and Construction Report (DCO Document Reference 7.1).</p> <p><u>Cost- Benefit of Undergrounding</u></p> <p>SP Manweb's starting point is its duties under the Electricity Act 1989, being:</p> <p>Section 9 – to develop and maintain an efficient, co-ordinated and economical system of electricity distribution; and</p> <p>Schedule 9 – (a) to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and (b) to do what he reasonably can to mitigate any effect which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p> <p>Whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989). Given that National Policy Statement EN-5 sets a high threshold for refusing overhead lines in favour of undergrounding and TAN 8 explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>SP Manweb, in its design of a connection, looks at the policy guidance in both National Policy Statement EN-1 and National Policy Statement EN-5 (and the Holford Rules). The route of a proposed overhead line needs to be assessed considering the following:</p> <ol style="list-style-type: none"> a. Is there a “<i>particularly sensitive location</i>” along the route of the 132kV Overhead Line where the effects of the 132kV Overhead Line in that locality would give rise to “<i>serious concerns</i>”. b. If the answer is in the affirmative, then is this an “<i>exceptional circumstance</i>”, where undergrounding the line would bring “<i>very significant benefits</i>”, which would “<i>clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable</i>”. <p>SP Manweb has addressed the issue of placing the Proposed Development underground in the following documents:</p> <ul style="list-style-type: none"> • The Planning Statement (DCO document reference 7.4) and supporting Technical Appendix (DCO document reference 7.5) look at the need for undergrounding specifically in this location in detail. • Paragraph 19 of the Response to Relevant Representations provides further information regarding SP Manweb’s decision to route the Proposed Development

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		<p>overhead and the costs associated with placing the development underground.</p> <ul style="list-style-type: none"> • SP Manweb's response to FWQ 8.1 reiterates SP Manweb's position that a wholly underground design cannot be justified given Government policy accepts the need for overhead lines and the relatively higher costs of such a scheme in this case. <p>SP Manweb's assessment concludes that the 132kV Overhead Line does not give rise to any major adverse landscape and visual effects (and thus serious concerns, being a test in National Policy Statement EN-5) and does not produce major adverse effects on any cultural heritage assets (and thus substantial harm, being a test in National Policy Statement EN-1). There is, therefore, no justification for any undergrounding in part. Furthermore, the route of the 132kV Overhead Line has been chosen as it minimises the impacts on the environment when compared with the alternative route options.</p> <p>The total cost of undergrounding the circuits is estimated at between £59.8 and £71.2 M. This is a total life time cost of the project and these numbers are a combination of lifetime costs and the installation cost, it is not appropriate to simply divide this figure by the route length to obtain a cost per km. The total cost figure includes the significant costs of the substation equipment at each end, life time operational and maintenance costs and life time cost of losses. The analysis quoted does not, therefore, take any of these costs into consideration.</p> <p>The SP Manweb 2015 capital construction cost of undergrounding the 132kv cables is estimated to be between £1,150,000 and £1,640,000 per km depending on the difficulty of the ground conditions. Western Power Distribution, in its life time costs estimate for its Brechfa Forest project, estimated the capital costs for that project ranged per km from £950,000 to £1,003,000. This is a difference between the two projects of £200,000 – £637,000 per km (such a difference being due to the particular ground conditions for each project and the extent of the changes in ground conditions throughout the route of each project). The figures are therefore comparable. The SP Manweb 2015 capital construction cost of 132kV overhead double wood pole is estimated to be £340,000 per km. Therefore, the capital construction costs of undergrounding cables for the Proposed Development is between 4.7 and 6.7 times that of an overhead line.</p> <p>In the context of the requirements under the Electricity Act 1989 for SP Manweb to run an efficient, coordinated and economical system for the distribution of electricity, this is a significant ratio.</p>
Campaign for the Protection of Rural Wales Clwyd Branch	<p>1.1 The CPRW Clwyd Branch objects to the preferred route solution for the overhead transmission line for the following reasons:</p> <ul style="list-style-type: none"> • The overhead line will have a significant, permanent and damaging impact on a landscape noted for its natural beauty and unique features. • The overhead line will cause significant harm to the landscape that makes an immeasurable contribution to the local economies of the areas through which it will pass. 	<p><u>Undergrounding</u></p> <p>SP Manweb notes that Denbighshire County Council at paragraph 3.2.6 of its Written Representation states that it "<i>accepts the approach taken to the development of route corridors and the selection of a preferred route is appropriate, and [that it recognises] that following a public consultation, the preferred route was amended to pass further to the west of Henllan to address particular concerns.</i>" This acceptance acknowledges that SP Manweb has looked at the alternatives in accordance with the Electricity Act 1989, National Policy Statements EN-1 and EN-5 and the Holford Rules.</p>

Respondent	Written Representation	SP Manweb Response
	<ul style="list-style-type: none"> • SP Manweb does not accept the implementation of undergrounding the line connection purely on financial considerations despite creation of a wirescape within an area of attractive high quality landscape where the overhead line negotiates the Afon Elwy Valley. • SP Manweb fails to adequately justify that the preferred route option reflects the company's accepted national responsibilities to safeguard the landscape of rural Wales and to protect the continued well being of those who live, work and depend on the areas through which the preferred route will pass and also those who visit these locations. <p>2. Justification for Objection</p> <p>2.1 As a matter of principle, the CPRW Clwyd Branch does not accept that any one activity or development should be allowed to displace or create such an imbalance within a landscape that would result in the value of the place where it is located, or the qualities of its surroundings, being degraded or forfeited.</p> <p>2.2 We believe there are few more devastating examples of landscape degradation than structures; indicated as being between approximately 11.8m (38.7ft) and 16.4m (53.8ft) high above ground, (source: Environmental Statement, Chapter 1, Section 1.5.5); each comprising of double wooden poles in order to carry a transmission line across 17km of open countryside. This is despite mitigation suggestions as to screening that, allegedly, will reduce their adverse impact upon the natural beauty of the landscape.</p> <p>2.3 Under Article 1 of the European Landscape Convention; of which the UK is a signatory, 'landscape protection' is referred to as being measures to preserve the present character and quality of landscape which is greatly valued on account of its distinctive natural or cultural configuration. Such protection must be active and involve upkeep measures to preserve significant features of landscape. Article 2 of the same document reveals that the scope of the Convention covers natural, rural, urban and peri-urban areas, inland water and marine areas. It also concerns landscapes that might be considered outstanding, as well as everyday or degraded landscapes.</p> <p>2.4 Attention is drawn to National Policy Statement for Electricity Networks Infrastructure EN-5, (July 2011), where within Section 2.8.2 it states: '...at particular sensitive locations the potential adverse landscape and visual impacts of an overhead line proposal may make it unacceptable in planning terms, taking account of the specific local environment and context.'</p> <p>This is particularly pertinent with regard to the Afon Elwy Valley where, just over the northern side of the Cefn Meiriadog ridge at the terminal pole the overhead line is to be undergrounded for 1.8km to its connection with the St Asaph Substation. Is it not conceivable for the undergrounding of the line to be extended across the valley to just behind its southern ridge to protect such a sensitive area?</p> <p>2.5 The long established Holford Rules relating to landscape principles that are applied in the decision making of routing overhead lines clearly state that such proposals should be avoided if possible where areas of highest amenity value, or smaller areas of high amenity value is encountered and alternative routing arrangements adopted.</p> <p>2.6 SP Manweb is also under a statutory obligation under Section 38 and Schedule 9</p>	<p>SP Manweb's starting point is its duties under the Electricity Act 1989, being:</p> <p>Section 9 – to develop and maintain an efficient, co-ordinated and economical system of electricity distribution; and</p> <p>Schedule 9 – (a) to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and (b) to do what he reasonably can to mitigate any effect which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p> <p>Whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989). Given that National Policy Statement EN-5 sets a high threshold for refusing overhead lines in favour of undergrounding and TAN 8 explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>SP Manweb, in its design of a connection, looks at the policy guidance in both National Policy Statement EN-1 and National Policy Statement EN-5 (and the Holford Rules). The route of a proposed overhead line needs to be assessed considering the following:</p> <ol style="list-style-type: none"> a. Is there a "<i>particularly sensitive location</i>" along the route of the 132kV Overhead Line where the effects of the 132kV Overhead Line in that locality would give rise to "<i>serious concerns</i>". b. If the answer is in the affirmative, then is this an "<i>exceptional circumstance</i>", where undergrounding the line would bring "<i>very significant benefits</i>", which would "<i>clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable</i>". <p>SP Manweb has addressed the issue of placing the Proposed Development underground in the following documents:</p> <ul style="list-style-type: none"> • The Planning Statement (DCO document reference 7.4) and supporting Technical Appendix (DCO document reference 7.5) look at the need for undergrounding specifically in this location in detail. • Paragraph 19 of the Response to Relevant Representations provides further information regarding SP Manweb's decision to route the Proposed Development overhead and the costs associated with placing the development underground. • SP Manweb's response to FWQ 8.1 reiterates SP Manweb's position that a wholly underground design cannot be justified given Government policy accepts the need for overhead lines and the relatively higher costs of such a scheme in this case. <p>SP Manweb's assessment concludes that the 132kV Overhead Line does not give rise to any major adverse landscape and visual effects (and thus serious concerns, being a test in National Policy Statement EN-5) and does not produce major adverse effects on any cultural heritage assets (and thus substantial harm, being a test in National Policy Statement EN-1). There is, therefore, no justification for any undergrounding in part. Furthermore, the route of the 132kV Overhead Line has been chosen as it minimises the impacts on the environment when compared with the alternative route options. The alternatives considered are set out in Chapter 3 'Alternatives and Design Evolution' of the</p>

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	<p>Electricity Act 1989, (as amended), that adds weight to any decision to underground a line with it reading:</p> <p>'1. (1) In formulating the relevant proposals, a licence holder or a person authorised by exemption to generate, transmit, distribute or supply electricity</p> <p>(a) shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and</p> <p>(b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any flora, fauna, features, sites, buildings or objects.'</p> <p>2.7 Such an option to underground would not only rectify the damage to the landscape by existing overhead lines but prevent the additional adverse impact with the creation of a new and more intrusive one.</p>	<p>ES (DCO Document Reference 6.3).</p> <p>Regarding reference to underground the line across the Afon Elwy Valley to just behind its southern ridge, SP Manweb have reviewed the options and have proposed the least cost option. It will be impracticable to install a cable section underneath the river Elwy at the location where the overhead line crosses. Taking into account that the scheme already includes 2.6km of 132kV underground cable cost it is not deemed sensible to extend the original section. A more economical approach would be to reroute the whole underground section to a different access point to the overhead line. Undergrounding the line across the Afon Elwy Valley to just behind its southern ridge, results in an increase in cost of approximately £4M when compared with not undergrounding this section. (cable route including crossing of the river, less OHL not installed, less cost of associated diversions not undertaken</p> <p>As explained in the response to Meirick Davies above, whilst the effects on the Afon Elwy Valley were assessed as moderate, none assessed as major and thus none give rise to serious concerns under NPS EN-5. Accordingly, the increase in cost of approximately £4M is not justified given the assessed level of impact identified.</p>
	<p>3. Agricultural Land Classification</p> <p>3.1 Within SP Manweb's submitted Environmental Statement, Chapter 10, Section 10.5.7, it is revealed that agricultural land of Grade 3 classification is contained within the 1km Order limits of the Proposed Route Alignment along a significant distance of the preferred route option. No reference is made of its sub-division into Grades 3a and 3b, of which Grade 3a is deemed to be as 'Best and Most Versatile' (BMV) land.</p> <p>3.2 At Section 10.5.4 of the same chapter, the applicant states: 'Provisional reclassification</p> <p>By the Department for Environment, Food and Rural Affairs (DEFRA) to-date has removed Sub-classifications within Grade 3, considering Grades 1 and 2 as 'Best and Most Versatile' (BMV) land.' In support of this, at Section 10.5.6 of Chapter 10 of the Environmental Statement, a Table 10.4, headed 'Definition of Agricultural Land Classification Grades' is produced with the Grade 3 classification being undivided. This information is at complete variance with information available from the Welsh Government's Land, Nature and Forestry Division who maintain the sub-division of Grade 3.</p> <p>3.3 Agricultural land is a finite resource with land designated as being the 'Best and Most Versatile' confined to an extremely small percentage of the total agricultural land use within Wales. Such land falling within this classification requires to be protected and conserved for future generation.</p> <p>3.4 In Planning Policy Wales, Edition 7, (July 2014), Chapter 4 – Planning for Sustainability, at Section 4.10.1, it is stated: 'In development plan policies and development management decisions considerable weight should be given to protecting the land from development because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for development, and either previously developed land or lower in agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to</p>	<p><u>Landscape and Visual Impact</u></p> <p>The landscape and visual assessment has been carried out in accordance with current guidance in GLVIA3 and relevant policy, in particular National Policy Statement EN-1 (NPS EN-1) and National Policy Statement EN-5 (NPs EN-5). This is further explained at Section 16.11 (iv) of SP Manweb's Response to Relevant Representations (RR No. 13, 39 and 90) (DCO Document Reference SPM NWWFC RR Document 1). The landscape and visual assessment is presented in Chapter 7 of the ES (DCO Document Reference 6.7).</p> <p>Careful routeing and choice of infrastructure has avoided or minimised potential effects of the proposed 132kV Overhead Line on the landscape. Although some significant landscape residual effects are likely to arise, these are localised and have been assessed as moderate. No landscape residual effects are assessed as major for the Proposed Development alone or for combined cumulative effects.</p> <p>The secondary measures proposed, including hedgerow reinforcement and new hedgerow trees, would maintain and in time enhance a strong landscape framework which will help to visually accommodate the line and lessen its landscape effects.</p> <p>Where visual effects have been judged to be significant, SP Manweb has developed a range of specific mitigation measures. These are summarised in Table 7.23 (DCO document reference 6.7), and presented in Figure 7.23 of the ES (DCO document reference 6.16). Additional detail is provided in Appendix 7.6 of the ES (DCO document reference 6.20). The fact that none of the residual effects were assessed as major is not unexpected. An overhead line would be visible in the landscape, but the double wood pole structure chosen is of an appropriate scale (similar in height to mature trees, and generally lying below the horizon formed by the tree canopy) and is constructed from a material which sits well within this (largely) well-treed landscape.</p> <p>Section 7.10.8 of the ES (DCO Document Reference 6.7) acknowledges that any proposed planting is 'unlikely to fully offset effects arising from the Proposed Development but may help to reduce the effects'.</p>

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	<p>land of the lowest grade.’ Budgetary consideration is not accepted as being an overriding need with regard to use of agricultural land classified as Grade 1, 2 or 3a.</p> <p>3.5 In Technical Advice Note (TAN) 6 – Planning for Sustainable Communities (2010), at Section 6.2.3 it states: ‘Agricultural land is classified by grades according to the extent to which its physical or chemical characteristics impose long term limitations on agricultural use for food production. There are 5 grades of land numbered 1 to 5, with grade 3 divided into two sub-grades. The best and most versatile land falls into grades 1, 2 and sub-grade 3a and is the most flexible, productive and efficient in response to inputs.’</p> <p>3.6 Within the same TAN 6, attention is also drawn to the following sections, which read respectively: ‘6.2.1 When preparing development plans and considering planning applications, local planning authorities should consider the quality of agricultural land and other agricultural factors and seek to minimise any adverse affects on the environment. 6.2.2 Planning authorities should bear in mind that, once land is built on, the restoration of semi-natural and natural habitats and landscape features is rarely possible and usually expensive, and archaeological and historic features cannot be replaced. Also, once agricultural land is developed, even for ‘soft’ uses such as golf courses, its return to agriculture as best and most versatile agricultural land is seldom practicable.’</p> <p>3.7 SP Manweb has failed to differentiate between agricultural grades 3a and 3b that could result in loss of BMV land due to proposals to construct access tracks, underground limited short sections of the line and erect poles upon agricultural land. Such a loss has the potential to become permanent from information contained in Chapter 5 of the submitted Environmental Statement where, at Section 4.6.5, one is informed: ‘The need for the 132kv Overhead Line is dependent on the contracted wind farms, which have an anticipated operational life of 25 years. Operational requirements of the local electricity network and associated demand will be kept under continuous review throughout the period to determine the long term use and retention of the 132kv Overhead Line.’</p>	<p>NRW has confirmed, in its relevant representations response (RR No. 91) and at paragraph 3.7.2 of its Written Representation that "<i>the methods used in the Landscape and Visual Impact Assessment to be appropriate, compliant with current guidance and [that they] concur with the assessment of residual effects.</i>"</p> <p>Please refer to First Written Questions (1.4) which explains how ‘good design’ has been addressed by in the development of the project in accordance with NPS EN-1.</p> <p>The IP has referred to article 1 of the European Landscape Convention.</p> <p>The identification of some significant landscape and visual effects is not unusual and is acknowledged in NPS EN-1 (paragraphs 5.9.8 and 5.9.18). The introduction of some 215 (circa 13m high) structures into the rural landscape of North Wales will inevitably result in some significant landscape and visual effects.</p> <p>The assessment predicted a number of moderate effects on landscape and views which would be experienced by people moving about the area generally up to 2km from the proposed 132kV Overhead Line. These significant effects would typically only be experienced where the proposed 132kV Overhead Line would appear in the foreground of a view and in the more open upland areas at the southern end of the Proposed Development around Tir Mostyn and Foel Gasyth. In many middle distance and longer views, the appreciable screening and backdropping afforded by the coalescence of layers of vegetation, particularly in the undulating farmland, will generally be effective in reducing the visibility. In these instances, the Proposed Development would not be a noticeable component in the view and would therefore be unlikely to give rise to significant visual effects.</p> <p>The assessment concludes that there is the potential for four residential properties to experience significant visual effects from the Proposed Development near Groesfford Marli. However, none of these predicted effects is so great that they would commonly be described as obtrusive or ‘overbearing’ in residential visual amenity terms.</p> <p>SP Manweb considers that the predicted effects of the Proposed Development are proportionate to the type of development proposed. An overhead line would be visible in the landscape, but the double wood pole structure chosen is of an appropriate scale (similar in height to mature trees, and generally lying below the horizon formed by the tree canopy) and is constructed from a material which sits well within this (largely) well-treed landscape. Combined with the careful route which has been selected, this embedded mitigation would reduce the likely effects.</p> <p>Whilst SP Manweb acknowledges that there will be some identified likely significant environmental effects, the company maintains that the Proposed Development accords with the principles of the European Landscape Convention.</p> <p>The European Landscape Convention seeks to promote landscape protection, management and planning across Europe, and to organise European-wide co-operation on landscape issues. The first aim of the European Landscape Convention is to encourage States to introduce a national landscape policy that is not restricted to the protection of</p>

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		<p>exceptional landscapes but also takes everyday landscapes into consideration. This was acknowledged by SP Manweb in the assessment of landscape value presented in Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7).</p> <p>Table 7.4 of Chapter 7 presents the criteria which were used to assess the relative value of the landscapes in and around the study area. It includes criteria relating to perceptual and experiential aspects. Paragraphs 7.7.49 of Chapter 7 state that this type of criteria-based approach <i>"is in line with the European Landscape Convention which promotes an 'all landscapes' approach, founded on the recognition of value in all landscapes."</i></p> <p>Criteria relating to perceptual and experiential aspects of the landscape were also included in the assessment of the susceptibility of the landscape to the Proposed Development.</p> <p>The judgements on both landscape value and landscape susceptibility were then used in the assessment process. by adopting this approach, the predicted significance of effect included consideration of Perceptual and experiential aspects of the local landscape.</p> <p>SP Manweb therefore maintains that the Proposed Development accords with the principles of the European Landscape Convention.</p> <p>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.</p> <p>Please refer to the response to the Written Representation by Conwy County Borough Council (Section 4; Amplification to Ground B Objection paras 4.10 – 4.14) which explains SP Manweb's approach to undergrounding (which includes analysis of whether it is appropriate to underground in the Elwy Valley), whether the Proposed Development satisfies the planning policy and guidance tests pursuant to the Electricity Act 1989, NPS EN-1 and NPS EN-5, Planning Policy Wales and Technical Advice Note 8.</p> <p><u>Agricultural Land Classification</u></p> <p>Welsh Government holds all ALC data. A request was made to Welsh Government Rural Affairs team who were able to provide an outline ALC map based on 1977 data, but this contains no detail on sub-division of land grade 3. Based on the information provided by Welsh Government the only way to distinguish between sub-classes 3a and 3b along the route would be to commission a new survey of the land along the Proposed Development route. From the date of commissioning a private consultant to complete this work it is likely to take several months to have a detailed map of land grades. As such, if grade 3a is considered as Best and Most Versatile, then the conservative assumption would be to treat all land within grade 3 along the proposed development as BMV.</p> <p>Please see SP Manweb's response to FWQ 4.7 (d) (DCO Document Reference SPM NWWFC ExA1) <i>"The area within the order limits of the Proposed Development is mainly comprised of a mix of pasture for grazing and arable land. In terms of the impacts on agricultural operations following completion of the construction phase; it is considered that these will be minor because they will be limited to impacts arising from the loss of agricultural land within the footprints of the electrical poles and stays. The Proposed Development has been designed to minimise the number of poles required, whilst ensuring</i></p>

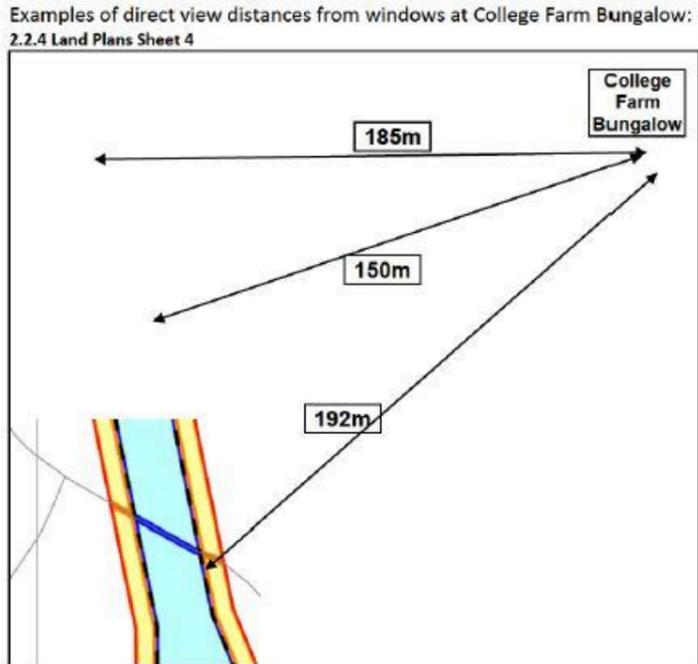
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		<p><i>compliance with SP Manweb's specification for 132kV Overhead Line of the kind proposed. One of the reasons this approach is taken is to minimise the effect on agriculture."</i></p> <p>Finally, it should also be noted that the extent of impact on agricultural land will be very limited in that a standard pole footprint where it would be neither practical nor possible to carry out agricultural operations would be a maximum of approximately 40m², or 0.004 hectares which is equivalent to 0.010 acres. This is based on a pole separation of 3 metres, pole diameter of 0.50metres, and a working area buffer of 2 metres. Such a minimal reduction in field working area should not adversely affect agricultural operations to any meaningful extent.</p>
Durand Hotham	<p>Plas Newydd is set in a commanding position high above the Elwy on a rocky outcrop with expansive views particularly to the south over the Elwy valley, taking in the Clywdian Range to the south east, and even over Denbigh and Rhuthin to the distant horizon twenty five miles away of the Llanntysilio Hills.</p> <p>It was built in 1583 by Robert ap Ffolkes of local Welsh gentry and is important for its fine unaltered vernacular appearance and as a result it has the second highest listed status in the land of Grade II Star. Notwithstanding its place in the history of North Wales it is also unique for its firsts in the period for dormers, very early use of glass and slate and for the exceptionally tall high status chimneys (the proposed pylons being, incidentally, a similar height).</p> <p>The principal and largest room at Plas Newydd is the important Upstairs Chamber on the first floor, half the width and depth of the whole house, (and where marriages took place before the establishment of local places of worship). The elevated site and the very house itself will have been selected and designed to accommodate the impressive vista from this room.</p> <p>It is entirely inappropriate that this iconic post medieval dwelling should ,180 metres away, be fronted by modern industrial 15 metre, steel gantried, double wooden pylons with their associated metal and glass furniture. The impact upon Plas Newydd and its historical landscape, and indeed the immediate Elwy Valley, will be unalterably and permanently compromised unless the electricity cables are undergrounded. Please see the attached photographs for a current visual appraisal.</p> <p>Given that Grade II Star buildings are "Particularly important buildings of more than special interest" and the subject of both The Holford Rules and The Planning (Listed Building and Conservation Areas) Act 1990 it is surprising that so little attention has been given to their guidance:</p> <p>Holford Rules (7.2 Rule 1): "Avoid altogether, if possible, the major areas of high amenity value, by so planning the general route of the line in the first place, even if the total mileage is somewhat increased in consequence..... Areas to be avoided include: Listed Buildings...."</p> <p>The Planning (Listed Building and Conservation Areas) Act 1990 "The Act requires local planning authorities to have special regard to the desirability of preserving the setting of a Listed Building, and it also requires planning proposals to meet the test of determining the extent to which a development affects views to and from a Listed Building. It also requires planning proposals to meet the test of determining the extent</p>	<p><u>Cultural Heritage</u></p> <p>Chapter 8 of the ES 'Historic Environment' (DCO Document Ref 6.8) provides details of the methodology adopted for the assessment. The methodology adopted is in line with relevant legislation, guidance and policy.</p> <p>Plas Newydd is listed Grade II* for its special historic importance as an exceptionally well-preserved example of an Elizabethan regional gentry house. As such it derives its significance primarily from its age, fabric, form and architectural design. Its immediate setting and distant views of the Elwy valley to the south and Denbighshire hills beyond are also important.</p> <p>Field assessment of visual effects was carried out from along the route of the Proposed Development, from the road between Sinnan and Hafod which runs alongside to the east of Plas Newydd, from a public right of way to the west of the house and from various locations to the north and south of the Proposed Development, where access permissions had been granted.</p> <p>Chapter 8 refers to woodland to the east and west of the house. These block some middle-distance and distant views of the Proposed Development, narrowing the field of view to approximately 70°, centred to the south east.</p> <p>Chapter 8 also refers to aggregate access tracks, modern barns/kennels and "roadside furniture" (the latter should read telegraph poles). These are visible in views from the curtilage of the house, though not necessarily from the house itself. They are also visible in some views from the south east towards the house and its curtilage. SP Manweb notes that a modern house and modern barns do appear (left of centre, middle-distance) in the photo taken from the upstairs chamber of Plas Newydd, which is provided in E.D.Hotham's Written Representation. Both sets of low voltage overheads lines are also visible in this photo.</p> <p>Table 8.12 of the ES correctly records Plas Newydd as being located 301m and 321m from the Limits of Deviation and the centreline of the route respectively, at its nearest point. Plas Newydd is located 390m and 400m from the Limits of Deviation and the centreline of the route respectively, along its short axis (i.e. the view from the front of the house). Please note that Figure 32, which maps the Proposed Development in relationship to Plas Newydd, is at a scale of 1:2500 when printed at A3 size. The scale bar is in error. The bar is 200m long and not 100m as shown.</p> <p>In terms of assessing potential effects of the Proposed Development on Plas Newydd, Chapter 8 of the ES 'Historic Environment' determined a "Minor" magnitude of effect primarily on the distance of the asset from the Proposed Development. It also took into account: a) the field of vision of the Proposed Development; b) the adverse effect on key middle-distance views of the Elwy Valley; c) the unaffected key distant views of the</p>

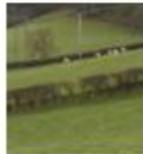
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	<p>to which a development affects views to and from such an area”.</p> <p>This is endorsed by Mr Peter Welford’s letter at Appendix A and who last assessed Plas Newydd for CADW and the proposed plans themselves also recognise the importance of the historic environment of Plas Newydd (Appendix A) yet take little account of them.</p> <p>The following anomalies in the proposal also seriously question the applicant’s methodology in the genesis of their plan</p> <p>Plas Newydd’s commanding position over the planned pylon route was designated as a Visual Receptor yet, despite invitations, no evaluations have been carried out from the site itself.</p> <p>The above is also confirmed by the wholly inaccurate description in Appendix B where neither the woodlands to the east or the road to Plas Hafod are part of the view from Plas Newydd, the so called un-pristine aggregate access tracks, modern barns/kennels and “roadside furniture” are also all unsighted and the 33kV overhead line is planned to be buried along with one of the lower voltage lines (highlighting another unsuitability of the route on account of Cumulative Effect and expenditure which could be better allocated to undergrounding). The consequence of utilising these factual errors is that the applicant has erroneously concluded that “Overall the effects on its setting (Plas Newydd’s) will be minor”</p> <p>In the meantime an unrepresentative impression of the area is presented in the visual / photomontage (6.20.3C landscape 7 Visual Technical Appendix 7.3 Part C. Viewpoint 37) some 300ft to the south and 40ft below Plas Newydd where there is no habitation on a track primarily used by cattle.</p> <p>It is stated that any property further than 200 metres from the proposed overhead lines is too distant to qualify for serious consideration of the effects upon their property (6.20.1Appendix 7.1: Residential Visual Amenity Assessment). Notwithstanding that properties in elevated positions, such as Plas Newydd, will have much enhanced views of any proposed pylons, the premises is erratically described as being between 200 – 325 metres distant (e.g. Appendix 7.1Table2.1 Summary of Residential Visual Amenity Effects on Properties).</p> <p>In fact, Plas Newydd is shown to be only 180 metres from the proposed line on the plan (6.22 Figure 32, Chapter 8 & in Appendix C, attached).</p> <p>Meanwhile the applicant contradictorily categorises Plas Newydd’s Sensitivity as high whilst consistently devaluing all the other the criteria (Impact, Magnitude, Visual Effect, Value) as minor, small or neutral, with very little exception, and quoting more biased statements. For example, “The combination of distance, intervening vegetation and outbuildings, and presence of other wood pole structures means the predicted magnitude of change would be small”. This ignores the fact that the distance is only 180 metres, intervening vegetation, if any, does not actually obscure the view and the other wood pole structures are miniature compared to the proposed ones or their cables will be buried. Additionally, such is the lack of partiality that Plas Newydd does not rate a mention in the Cumulative Residential Visual Amenity Effects on Properties (6.7 Ch 7) whilst very modern Plas Hafod ,only a stone’s throw away and 50ft below, is fully appraised. Furthermore cover from conifer trees is mentioned when there are</p>	<p>Denbighshire hills, and d) the non-pristine nature of Plas Newydd’s setting.</p> <p>As a Grade II* listed building, Plas Newydd is of “High” sensitivity. However, for the reasons above the significance of the assessed effect is minor and not considered Significant.</p> <p>It is noted that Denbighshire County Council in its Local Impact Report has stated:</p> <ol style="list-style-type: none"> 1. at paragraph 9.2.2 – “...there are no listed buildings within 100 metres of the Order Limits of the route, the nearest being approximately 300 metres away at Plas Captain and Plas Newydd.” 2. at paragraph 9.2.3 that “it is accepted that in both cases [Plas Captain and Plas Newydd] the impact on the setting of these buildings will be neutral and moderate/slight respectively.” The Council goes on to say at paragraph 9.3.1 that it “considers the proposal would have a Neutral impact on the historic environment.” <p>Although not considered as part of the Proposed Development or within the assessment (i.e. the LVIA assessment has taken a worse case scenario and assumed that infrastructure will remain in-situ), SP Manweb is proposing to underground approximately 520m of lower voltage overhead line which would remove 5 stacked poles from views to southeast of Plas Newydd, and approximately 930m of lower voltage overhead line, which would remove a further 3 poles from views to the southeast. These works would have beneficial effects on the setting of Plas Newydd.</p> <p>The overall effect of the Proposed Development on Plas Newydd, with the benefits of lower voltage diversions, would reduce from minor to neutral. Without the diversions the impact would remain minor.</p> <p>The IP has stated that it is surprising that so little attention has been given to the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>The primary requirement on the Secretary of State pursuant to Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010, is to have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses. Critically, this test does not require “special regard” to be paid.</p> <p>Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (to have “special regard” to the desirability of preserving listed buildings or their settings) is not engaged in respect of an application made under the Planning Act 2008. However, it is acknowledged that the Secretary of State could determine that section 66 is something that is both important and relevant to her decision under section 104(2)(d) of the Planning Act 2008.</p> <p>The Court of Appeal decision in Barnwell Manor is also of importance in relation to the application of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which provides:</p>

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	<p>none in the vicinity and much made about cover from deciduous trees with no reference that there is virtually no mitigation by such trees when the leaves are off for at least half the year between autumn and early summer.</p> <p>All of the above dramatically alters the dynamics of the applicant's assessment of Plas Newydd. There will be a fundamental change to the character of the landscape and a substantial change to the view both of which, by regulation, qualify as major on the criteria cited above and call for a radical alteration to the proposed plan.</p> <p>The applicant's claim that "underground cabling of the connection was considered but the benefits were not considered to outweigh the additional cost" is entirely wrong in this context. As is indicated by the applicant's own proposition to underground both the existing 33kV overhead line and one other in front of Plas Newydd, the land is perfectly suited for the purpose, as it is all the way up from the River Elwy. Indeed, it is illogical and contrary that it is proposed to bury the 33kV cables but not the 132kV ones.</p> <p>Plas Newydd is a valuable part of the nation's heritage and its setting should not be sacrificed for short term gain when underground cabling is not only environmentally beneficial but also more economical in the longer term.</p>	<p>1. In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses</p> <p>2. The Court of Appeal made it clear that in enacting section 66(1), Parliament had intended that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carried out the balancing exercise.</p> <p>The ES Chapter 8 at paragraph 8.2.12 explains that the assessment has taken into account the principles of the Barnwell Manor Court of Appeal case.</p> <p><u>Landscape and Visual Impact Assessment</u></p> <p>The property was assessed, as with all the residential properties, from publically accessible locations in close proximity to the receptor. The assessment was informed by the site visit, information from site photos, stakeholder feedback (including information about the importance of views from the upper floor of the main residence), aerial mapping and GIS data.</p> <p>We cannot locate the referenced text within our landscape and visual documents. To clarify, the actual text from the residential visual amenity assessment is as follows:</p> <p><i>"A large detached Grade II* listed property (an Elizabethan manor house), with associated outbuildings, which is located approximately 255m from the boundary (280m from the house) to the nearest pole located on the centreline of the Limits of Deviation.</i></p> <p><i>Distance from the boundary of the closest outbuilding to the nearest point on the edge of the Limits of Deviation is approx. 235m - this represents the worst case scenario in terms of potential nearest proximity to the Proposed Development.</i></p> <p><i>The Final Route Alignment runs from the Afon Elwy in a north east direction towards the Cefn Meiriadog ridge, and passes to the east of the property. The property is located north of the Afon Elwy near the Cefn Meiriadog ridge, and occupies an elevated rocky outcrop (at approximately 135m AOD) overlooking the Afon Elwy valley. This location affords wide views over the Afon Elwy valley particularly from the upper windows of the main house (where the reception area is) and some external garden spaces. Existing views include pastures bounded with mature hedgerows and hedgerow trees (including mature Oak trees), dispersed residential properties, the adjacent minor road, and blocks of deciduous and coniferous woodland. These views extend from the upper ridge of Cefn Meiriadog across the full width of the Elwy valley. The upper floors of this property would have views of the tops of the wooden double poles structures as they passed to the south east of the property, however intervening outbuildings, the residential property Plas Hafod, and existing intervening vegetation would screen many of the views. The wood poles would benefit from a background of existing mature trees and hedgerows, and rising landform. In addition, there is a medium sized agricultural storage building visible, and existing lower voltage overhead line and telegraph poles to the south and east. A 400 kV pylon line are visible on the skyline to the west. There are distant views to the south towards the Elwy</i></p>

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		<p><i>Valley ridge, where poles are likely to be seen on the skyline.”</i></p> <p><i>Sensitivity: High</i></p> <p><i>Magnitude: Small</i></p> <p><i>Rationale and Summary: The combination of distance, intervening vegetation and outbuildings, and presence of other wood pole structures means the predicted magnitude of change would be small.</i></p> <p>Minor (not significant)</p> <p>As noted in Appendix 7.3: Viewpoint Assessment, DCO Document Reference 6.20.3D, Viewpoint 37 was selected to be representative of views from:</p> <p>Local communities:</p> <ul style="list-style-type: none"> • Cluster of residential receptors <p>Recreational/Cultural receptor:</p> <ul style="list-style-type: none"> • Public Rights of Way (that lead to the Lower Elwy Valley Historic Landscape and Conwy Landscape Value Area) • Listed Buildings (Plas Newydd) <p>Users of roads:</p> <ul style="list-style-type: none"> • Local lanes <p>The elevation of visual receptors, and the subsequent likely views of the Proposed Development are considered in the assessment of residential visual amenity, as noted in the following extract:</p> <p><i>“The property is located north of the Afon Elwy near the Cefn Meiriadog ridge, and occupies an elevated rocky outcrop (at approximately 135m AOD) overlooking the Afon Elwy valley. This location affords wide views over the Afon Elwy valley particularly from the upper windows of the main house (where the reception area is) and some external garden spaces.”</i></p> <p>Since the residential property has adjacent outhouses of significant size, these were noted in the assessment along with distances to these and the main residence for clarity. SP Manweb's mapping indicates the closest point from the edge of the Limits of Deviation to the edge of the nearest outhouse would be approximately 235m as notes in the assessment.</p> <p>Statements relating to sensitivity, magnitude, etc., are based on survey and assessment of the residential visual receptor and knowledge of proximity and nature of the Proposed Development, and relate directly to the Methodology described in Chapter 7:Landscape and Visual, DCO Document Reference 6.7.</p> <p>As noted in Appendix 7.1: Residential Visual Amenity Assessment, DCO Document reference 6.20.1, properties located 200m or more from the Proposed Development are unlikely to experience an overbearing effect on visual amenity given that the apparent height of the poles in the view would be much less than 7.5cm. The property lies over 200m from the Proposed Development but was included within the initial assessment following concerns raised during stakeholder and public consultations and site survey. Properties greater than 200m from the Proposed Development were not assessed as part of the cumulative effects on residential visual amenity.</p>

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		<p>Any assessment on visual effects takes heed of the likely views when deciduous trees are not in leaf, since the level of screening from vegetation will be reduced. Whilst leaf cover can give complete screening, tree branches clear of any leaves can still provide a foil between the visual receptor and the Proposed Development. Viewpoints are taken during winter months to reflect the likely effects when deciduous trees are not in leaf, and screening from vegetation is at a minimum. We can find no reference to conifers in the residential visual amenity sections of the ES in relation to this property.</p> <p>The landscape and visual assessment of this area finds that there are likely to be moderate significant adverse visual effects on the area close to the property within the Elwy Valley and on the Cefn Meiriadog, and there are likely to be moderate adverse landscape effects within the Afon Elwy East Valley - East and Upper Elwy Valley and the Cefn Meiriadog ridge (Limestone Valley - Cefn), as notes in Chapter 7: Landscape and Visual. Section 7.10, DCO Document Reference 6.7.</p> <p>The IP has also stated that SP Manweb has not had due regard to the Holford Rules, which is not accepted by SP Manweb. The Holford Rules were explicitly considered and are referred to in Chapter 7 of the Environmental Statement (DCO Document Reference 6.20) and the Design and Construction Report (DCO Document Reference 7.1).</p> <p><u>Cost Benefit Analysis</u></p> <p>The cost of undergrounding 132kV is significantly more than for 33kV cables (132kv is typically 3 times greater than 33kv cable). The option of undergrounding the 33kV circuits has only been taken where it is not possible for the two overhead lines to cross each other and the necessary safety clearances maintained.</p> <p>The SP Manweb 2015 capital construction cost of undergrounding the 132kv cables is estimated to be between £1,150,000 and £1,640,000 per km depending on the difficulty of the ground conditions. Western Power Distribution, in its life time costs estimate for its Brechfa Forest project, estimated the capital costs for that project ranged per km from £950,000 to £1,003,000. This is a difference between the two projects of £200,000 – £637,000 per km (such a difference being due to the particular ground conditions for each project and the extent of the changes in ground conditions throughout the route of each project). The figures are therefore comparable.</p> <p>The SP Manweb 2015 capital construction cost of 132kV overhead double wood pole is estimated to be £345,000 per km. Therefore, the capital construction costs of undergrounding cables for the Proposed Development is between 3.3 and 4.7 times that of an overhead line.</p> <p>In the context of the requirements under the Electricity Act 1989 for SP Manweb to run an efficient, coordinated and economical system for the distribution of electricity, this is a significant ratio.</p>
Dewi Parry	<p>Our representation relates to the property of College Farm Bungalow.</p> <p>We are extremely concerned that despite our submissions at consultation and pre-</p>	<p><u>Landscape and Visual Impact</u></p> <p>Having considered Dewi Parry's concerns, SP Manweb considers that the significance of</p>

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	<p>examination stages pointing out incorrect and misleading statements by the Applicant in their visual impact assessment on our property the Applicant has still not fairly presented the visual impact in their assessment nor proposed effective mitigating measures.</p> <p>We disagree with the Applicant’s detailed descriptions, their interpretation of visual impact and their ‘Minor (not significant)’ conclusion.</p> <p>With reference to the following EIA sections:</p> <p>6.20.1 ES Chapter 7 - Landscape and Visual Technical Appendix 7.1 Table 2.1: Summary of Residential Visual Amenity Effects on Properties</p> <p>*Indicates properties greater than 200m from the centreline of the Limits of Deviation</p> <p>Table 3.1: Detailed Description of Effects on Residential Visual Amenity at Residential Properties</p> <p>Firstly, the two sections above are contradictory; the ‘Summary’ states that these are “..properties greater than 200m from the centreline of the Limits of Deviation”, whereas the ‘Detailed Description’ states that the properties are “190m from the nearest pole located on the centreline of the Limits of Deviation”. Clearly therefore the properties do lie within 200m of the centreline.</p> <p>In fact both statements are inaccurate and the actual proximity is understated. The Applicant’s description also misleads on the impact of skyline views.</p> <p><u>Proximities</u></p> <p>The Applicant states “distance to the nearest point on the edge of the Limits of Deviation is approx.. 170m – this represents the worst case scenario in terms of potential nearest proximity to the Proposed Development.”</p> <p>This statement is incorrect. Actual distance to nearest point on the edge of the Limits of Deviation (worst case scenario) is approx. ..0150m. There are direct views from 4 windows at this distance.</p> <p>We estimate 3 pylons and lines would be clearly directly visible to the west within 170m distance from centreline of limits of deviation. The applicant’s claim of “greater than 200m” is not true at any point on this part of the route.</p>  <p>Examples of direct view distances from windows at College Farm Bungalow: 2.2.4 Land Plans Sheet 4</p>	<p>effects on Residential Visual Amenity as experienced by occupiers of College Farm Bungalow would remain as assessed and presented in Section 7.7 of Chapter 7 ‘Landscape and Visual’ (DCO Document Ref 6.7) and Appendix 7.1: Residential Visual Amenity (DCO Document Ref 6.20.1). SP Manweb has checked and can confirm that this property lies some 170m from the edge of the Limits of Deviation and has been considered in the Residential Amenity Assessment. At this distance the wood pole structures would appear approximately 5.4cm high and would not prohibit or materially affect the panoramic views from the house or garden.</p> <p>Table 3.1 (Ref 7) in Appendix 7.1 states:</p> <p><i>“Primary views towards the Proposed Development would be distant and oblique.</i></p> <p>Minor (not significant)”</p> <p>The assessment also notes that:</p> <p><i>“Three, single and two storey detached properties approximately 190m from the nearest pole located on the centreline of the Limits of Deviation at its closest point. The properties are situated alongside a cluster of farm buildings which create a small settlement adjacent to a minor road. These properties are located within a local hollow at the end of a small valley. The surrounding landform and strips of woodland contain most views.</i></p> <p><i>Primary views are not orientated towards the Proposed Development, though Hendy College and College Farm may experience winter views (depending on tree cover) of the Proposed Development as it passes from the ridge down the valley sides towards Hendy. College Farm (the bungalow) would experience views of the Proposed Development to the rear (six windows) and side.</i></p> <p><i>The proposed 132 kV Overhead Line would briefly skyline as it reached the rising land adjacent to the B4501. There is a network of existing lower voltage overhead lines to the rear of the settlement and a short section of one of these lines is on the skyline. Telegraph poles are also visible from the properties.”</i></p> <p>It is considered that the above assessment of the effect on the residential amenity of College Farm is accurate. It has been prepared having used GLVIA3 guidance and considered relevant policy, in particular National Policy Statement EN-1 (NPS EN-1) and National Policy Statement EN-5 (NPs EN-5).</p> <p><u>Proximities</u></p> <p>Table 2.1 of Appendix 7.1: Residential Visual Amenity Assessment (DCO Document Ref 6.20.1) erroneously indicates (with the use of an asterisk *) that College Farm Bungalow is greater than 200m from the centre line of the Limits of Deviation. This is part of a grouped receptor which also includes Hendy College and Pen Y Buarth, both of which lie greater than 200m from the centre line of the Limits of Deviation. Table 3.1 of Appendix 7.1: Residential Visual Amenity Assessment (DCO Document ref 6.20.1) correctly indicates (based on mapping checks) that College Farm bungalow lies approximately 190m from the nearest pole on the centre line of the Limits of Deviation, and approximately 170m from the edge of the Limits of Deviation, and forms the main text and rationale of the assessment judgement. In both cases the overall judgement of the significance of visual effects is reported accurately as minor.</p> <p>Views of the Proposed Development as it skylines near the B4501 are from the rear and side of the property as noted in the assessment. The IP notes that up to 3 ‘pylons’ could skyline in views from the rear of the property. SP Manweb acknowledges that 3 - 4 wood pole structures and their associated wirescape are likely to be visible to the rear of the</p>

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	<p>Skylines</p> <p>To the west towards the B4501, there are direct open skyline views of two or more pole structures from 4 windows (kitchen, dining room and bedroom), the nearest pole being 185m away. The applicant states that “ the proposed 132kV Overhead Line would briefly skyline as it reaches the rising land adjacent to the B4501” This description grossly underestimates the actual effect and is misleading.</p> <p>There is currently no intervening vegetation or landform screening. Tree planting proposed by the Applicant would be completely ineffective due to pylon heights on the skyline and gradient of the land up to the ridge. However putting the cable underground would be an acceptable and effective solution.</p> <p>Shown below is an alternative view of one of the skylining structures in question. Part of Viewpoint 05 (6.20.3A ES Chapter 7 Landscape and Visual Technical Appendix 7.3 Part A)</p>  <p>The foreground pylon in the photo will be skylined from College Farm. At least one other pylon (out of camera view) in the field to the right would also clearly skyline. Additionally there may possibly be a third pylon beyond that, depending on the exact position and land gradient.</p> <p>There is another direct skyline view to the south from College Farm’s 2 windows (kitchen and living room) at approx 1km with no intervening screening.</p> <p>We have searched but cannot find any reference to this southern skyline view from College Farm in the Application and we therefore request that the Applicant addresses</p>	<p>property at a minimum distance of 170m. These would add to the existing wirescape visible from the rear of the property. There is potential for skylining of one structure and partial skylining of up to two structures as the Proposed Development runs close to the B4501. The wood pole structures would have an apparent height of approximately 4.8cm in views from the residential receptor if they were seen in their entirety. At this distance the Proposed Development is unlikely to have an ‘overbearing’ effect on the property and the judgement of the significance of effects on residential visual amenity remains minor.</p> <p>The response notes that there is an additional skyline view to the south. This will occur on the ridge noted in Table 3.1 of Appendix 7.1: Residential Visual Amenity Assessment (DCO Document Ref 6.20.1)</p> <p><i>“ Primary views are not orientated towards the Proposed Development, though Hendy College and College Farm may experience winter views (depending on tree cover) of the Proposed Development as it passes from the ridge down the valley sides towards Hendy. College Farm (the bungalow) would experience views of the Proposed Development to the rear (six windows) and side.”</i></p>

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	<p>this omission.</p> <p>The Applicant expresses concern in avoiding 'skylining' which implies acknowledgement of its harmful visual effect on the landscape, yet the descriptions in their impact assessment persistently downplay the true visual impact of skylining occurrences. We feel this practice is wholly unacceptable and misleads the Examining Authority.</p> <p>We strongly disagree with the Applicant's 'Minor (not significant)' assessment and request a reappraisal. We also believe that a site inspection by the Examining Authority is justified.</p>	
<p>John Mars Jones (on behalf of himself, Margaret Eirian Hones, Elin Mars Jones, Richard Mars Jones and Elinor Iona Jones</p>	<p><u>Improper Use of Process</u></p> <p>I feel that the manner in which the overall scheme is being handled, is an improper use of process because the environmental impacts of the combined development (i.e. the establishment of wind turbines and the transmission of the resultant electricity generated by the turbines to connect with the existing national grid) are not being assessed as a composite single development. I would like to know the legal basis upon which the overall development has been divided into separate projects (i.e. wind turbines and transmissions) and thus avoiding an all-embracing integrated single environment impact assessment?</p> <p>I acknowledge that Scottish Power are not responsible for the wind turbines/electricity generation but are responsible for providing a quotation and carrying out the works for an accepted electrical grid connection offer for that generated, however, we nevertheless wonder whether the issue could be potentially a matter for judicial review given there will be no single Environmental Impact Assessment of the overall scheme.</p> <p>Regarding our specific issues in relation to our contact with Scottish Power relating to the land at Berain farm, the correspondence and information received from Scottish Power is unclear and not reflective of our discussions and considerations. The letter received from Scottish Power related to the land and proposed route plan does not;</p> <ul style="list-style-type: none"> • reflect our objection to the grid connection crossing the land at Berain farm as the preferred route, • reflect our objection to the chosen route crossing the land at Berain farm and dissecting the individual fields and farm land in half without consideration for routing along existing field boundaries, • state our objection to the proposed overhead line being preferable to an underground grid connection, • identify and cross-reference the proposed land take within the letters and maps, • quantify the land-take for the proposed overhead electricity line, • identify the intentions for areas highlighted as ecological improvements, • quantify the land-take for the proposed ecological improvements, • demonstrate the determination of the derogatory value sated for an undeterminable area of land for grid connection line, way-leaves and ecological improvements. <p>I would consider that Scottish Power is responsible to conduct the development of the proposal in a clear and evaluated manner. Their assessment of the proposal and provision of specific information should be clear and demonstrate the evaluation of the decision process. I consider that the information and correspondence provided is unclear and misrepresentative of the specific location at Berain. Due to the</p>	<p><u>Assessment of the Wind Farms and the Proposed Development within the Environmental Impact Assessment</u></p> <p>National Policy Statement EN-1 acknowledges that whilst applications for generating stations and related infrastructure should be contained in a single application or in separate applications submitted in tandem, it may not always be possible. This is due to different lead-in times, different legal entities, and different commercial and regulatory frameworks.</p> <p>As set out in SP Manweb's response to the Examining Authority's FWQ 1.9, there is no dispute as to the proposition that planning policy supports the need for an enhanced electricity transmission network which distributes urgently needed electricity generated from renewable sources.</p> <p>SP Manweb has a statutory duty pursuant to the Electricity Act 1989 to connect Clocaenog, Brenig and Derwydd Bach to the national grid. Following the request for a grid connection being made, SP Manweb first identified the solution to the connection requests and then carried out routing studies to identify the Preferred Route Corridor. This process also included public consultation. Once the Preferred Route Corridor had been identified and the route alignment within that corridor identified, an application was submitted to the Secretary of State. The Secretary of State confirmed that the application complied with the statutory consultation requirements under the Planning Act 2008.</p> <p>The Wind Farms have been fully included within the Environmental Impact Assessment as part of the cumulative effects sections of each topic chapters contained within the ES. The cumulative assessment was structured as follows:</p> <p>Stage 1 – The Proposed Development with the Wider Scheme and the Wind Farms;</p> <p>Stage 2 – Stage 1 and with identified other developments (see the Table in response to FWQ 6.14 (DCO Document Reference SPM NWWFC ExA1).</p> <p><u>Consultation</u></p> <p>SP Manweb considers comments regarding the consultation process in Section 4 of its Response to Relevant Representations Document (SPM NWWFC RR Document 1). This section addresses points raised by IPs in relation to:</p> <ul style="list-style-type: none"> • SP Manweb's approach to statutory consultation; • failure to engage with interested parties in a consistent manner; • the consultation material; • failure to provide information; • statutory phases of consultation; and • validity of the process.

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	<p>questionable process conducted by Scottish Power I wish to understand why the consultation process is not questioned and assessed for appropriate due process and therefore questioning the validity of the planning application prior to even considering the planning application.</p>	<p>In summary, a Notification of Acceptance letter was received from the Planning Inspectorate (PINS) (acting on behalf of the Secretary of State), on 17th April 2015. The letter confirmed that the Secretary of State had accepted the Application for examination.</p> <p>The decision to accept the Application was informed by adequacy of consultation representations submitted to it by the local authorities, Denbighshire County Council (DCC) and Conwy County Borough Council (CCBC). The Secretary of State's decision of acceptance demonstrates that SP Manweb has complied with its statutory duties and that adequate consultation on the Proposed Development has been undertaken in accordance with the Planning Act 2008.</p> <p>A summary of the main contacts with Mr Mars Jones is as follows: Following the meeting with Mr John Mars Jones on the 22nd. October 2014 to discuss the project and indicative line design, as requested by Mr Jones a letter directing him to the documents setting out the route option selection process was sent 28th. October 2014. The formal offer for an Option and Easement was sent on the 26th. November 2014. This was followed on the 29th. of January 2015 with a further meeting primarily to discuss the 11kV diversion. The original diversion proposal was subsequently amended to take into account Mr Jones' comments. On the 1st.of April a meeting was held with Mr John Mars Jones to discuss proposed enhancement planting. At this meeting Mr Jones was informed that it was not possible for SP Manweb to accommodate his routing suggestions. On the 20th. April Mr Jones telephoned Freedom advising that he had employed Mr Corbett from Roger Parry and Company to represent him. At a meeting on the 8th. September with Mr John Mars Jones, Tudor Mars Jones, Eleanor Mars Jones and their agent Richard Corbett and his assistant, the scheme was discussed but Messrs Jones and Eleanor Jones were reluctant to discuss pole positions in detail as they felt that could prejudice their representations made in respect of the proposal. At this meeting there were no discussions regarding the land taken by the apparatus all discussions were in respect of their suggestions with regards to routing and undergrounding. At this meeting SP Manweb were informed that the land was split into two separate ownerships and revised offers for Options and easement were sent out based upon this ownership split on. There has been no formal response to SP Manweb in reply to the offers for Option and Easement.</p> <p>As explained above SP Manweb has complied with the consultation requirements in the Planning Act 2008 and therefore the Secretary of State will be able to take a decision on the application for development consent, taking into account the overall public need, but balanced against the interests of the immediate local community/landowners. SP Manweb considers that the process that it has followed is entirely valid and complies with the statutory requirements.</p> <p>Regarding the specific bullet points:</p> <ul style="list-style-type: none"> • <i>reflect our objection to the grid connection crossing the land at Berain farm as the preferred route</i> – SP Manweb has openly consulted on the various route options and published documents explaining why it has chosen the Preferred Route Corridor. There is a need for this connection, and so an overhead line has to be constructed somewhere. SP Manweb considers that the route it has chosen minimises and mitigates the impact on the environment and the historic environment. • <i>reflect our objection to the chosen route crossing the land at Berain farm and dissecting the individual fields and farm land in half without consideration for routing along existing field boundaries</i> – Where possible SP Manweb tries to locate poles and the overhead line along field boundaries. However, this is not always possible. [] • <i>state our objection to the proposed overhead line being preferable to an</i>

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		<p><i>underground grid connection</i> – The purpose of correspondence was to try and seek agreement over land rights, given the decision had been made to promote the Proposed Development.</p> <ul style="list-style-type: none"> • <i>identify and cross-reference the proposed land take within the letters and maps</i> – SP Manweb has published a Book of Reference that identifies by plot number all the plots that are subject to the compulsory acquisition and creation of rights and the imposition of restrictions. These plots are then shown on the Land Plans. <i>quantify the land-take for the proposed overhead electricity line</i> - there is no land take. The land over which SP Manweb is seeking the creation of rights and imposition of restrictions ranges from 20 to 40m wide. This is a very narrow corridor for SP Manweb to work within and demonstrates that SP Manweb is limiting the land over which it may exercise compulsory acquisition. • <i>identify the intentions for areas highlighted as ecological improvements</i> – SP Manweb has published landscaping plans that shows the landscaping areas , • quantify the land-take for the proposed ecological improvements, • <i>demonstrate the determination of the derogatory value sated for an undeterminable area of land for grid connection line, way-leaves and ecological improvements</i> – matters of compensation are for voluntary negotiation and, if agreement cannot be reached, for the Upper Tribunal.
	<p><u>Opposed to the Scheme on Grounds that its Economic Sustainability has not been assessed and consequently not taken into account</u></p> <p>I believe that the eventual long term cost to the government and consumers of generating electricity from wind farms will not be sustainable, so we would like to register out opposition in principle to the project. We feel that economic sustainability should be a key factor in any decision making process for such infrastructure schemes.</p>	<p><u>Economic Justification</u></p> <p>The wind farms have planning permission and, in the case of the Clocaenog Wind Farm, a Development Consent Order. It is not for this examination to assess the viability of those consented wind farms. SP Manweb has a statutory duty to connect, and therefore must obtain a connection pursuant to its statutory duties. In addition, and as agreed by CCBC (in response to FWQ 1.9) and DCC (in its LiR), the need case for the Proposed Development is established in the National Policy Statements for Energy.</p>
	<p><u>Least Intrusive Option</u></p> <p>If the Scheme is given the go ahead, the Jones family would prefer that only underground transmission cables be used along the section past Berain farm, given how an overhead power-line will permanently blight the features mentioned below. The proposed route of the overhead power-line dissect historic and established existing fields with no consideration of field boundary lines.</p> <p><u>Preferred Improved Overhead Route</u></p> <p>If the construction of an overhead transmission line does proceed, it will inevitably have a wide range of different impacts on the various properties, businesses, activities, features and landscape characteristics along its proposed route.</p> <p>It is clear that we as landowners have real concerns as to the adverse impact that the proposed route would have on such matters as cultural heritage, historic buildings, arable farming, leisure activities, tourism and associated business, mature parkland landscape etc.</p> <p>Given the many features that would be directly impaired by the immediate or close</p>	<p><u>Berain Farm and Undergrounding</u></p> <p>Please see the full response to CCBC's Ground A Objection of its Written Representations in relation to Berain.</p> <p><u>Undergrounding the Proposed Development</u></p> <p>SP Manweb's starting point is its duties under the Electricity Act 1989, being:</p> <p>Section 9 – to develop and maintain an efficient, co-ordinated and economical system of electricity distribution; and</p> <p>Schedule 9 – (a) to have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and (b) to do what he reasonably can to mitigate any effect which proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p>

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	<p>proximity of the power-line, the conclusion was that it would be impossible to significantly reduce the adverse impact by mitigation measures, such as tree planting. It is suggested that the only answer was to seek a route which would be undergrounded past the particularly sensitive and susceptible features and activities mentioned above.</p>	<p>Whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989). Given that National Policy Statement EN-5 sets a high threshold for refusing overhead lines in favour of undergrounding and TAN 8 explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>SP Manweb, in its design of a connection, looks at the policy guidance in both National Policy Statement EN-1 and National Policy Statement EN-5. The route of a proposed overhead line needs to be assessed considering the following:</p> <ol style="list-style-type: none"> Is there a "<i>particularly sensitive location</i>" along the route of the 132kV Overhead Line where the effects of the 132kV Overhead Line in that locality would give rise to "<i>serious concerns</i>". If the answer is in the affirmative, then is this an "<i>exceptional circumstance</i>", where undergrounding the line would bring "<i>very significant benefits</i>", which would "<i>clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable</i>". <p>SP Manweb has addressed the issue of placing the Proposed Development underground in the following documents:</p> <ul style="list-style-type: none"> The Planning Statement (DCO document reference 7.4) and supporting Technical Appendix (DCO document reference 7.5) look at the need for undergrounding specifically in this location in detail. Paragraph 19 of the Response to Relevant Representations provides further information regarding SP Manweb's decision to route the Proposed Development overhead and the costs associated with placing the development underground. SP Manweb's response to FWQ 8.1 reiterates SP Manweb's position that a wholly underground design cannot be justified given Government policy accepts the need for overhead lines and the relatively higher costs of such a scheme in this case. <p>SP Manweb's assessment concludes that the 132kV Overhead Line does not give rise to any major adverse landscape and visual effects (and thus serious concerns, being a test in National Policy Statement EN-5) and does not produce major adverse effects on any cultural heritage assets (and thus substantial harm, being a test in National Policy Statement EN-1). There is, therefore, no justification for any undergrounding in part. Furthermore, the route of the 132kV Overhead Line has been chosen as it minimises the impacts on the environment when compared with the alternative route options.</p>
	<p>Location Specific Considerations</p> <p>1) Cultural Heritage – the representation summaries the history of the Grade II* listed building at Berian.</p>	<p>Please see the full response to CCBC's Ground A Objection of its Written Representations in relation to Berian.</p>
	<p>2) Farming</p>	<p><u>Agricultural use of the land and Farming Business</u></p>

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	<p>The Jones family have run the farm at Berain for 100's of years. Over the years the farm has been developed into a high quality dairy, sheep and arable business. Scottish Power has been made aware of the farming practise and the detrimental affect it will have on farming practices. The installation of an overhead Power-line and its associated pylons would have a detrimental effect on the effectiveness and efficiency of farming operations due to the obstructions created.</p>	<p>Section 20.4 of SP Manweb's Response to Relevant Representations (DCO Document Reference SPM NWWFC RR Document 1) responds to the issues of impact on agricultural land and activity. Section 20.4.1 of that document details the ways in which SP Manweb will minimise the impact on agricultural activity; section 20.4.2 describes how the Environmental Statement has assessed potential impacts of the Proposed Development on agriculture and section 20.4.3 confirms that although the impacts of the Proposed Development are likely to be small, they will be properly reinstated and compensation paid for any losses arising from the pre-construction and construction works.</p> <p>Furthermore, SPM Manweb considers that it is not plausible that in the vast majority of cases the Proposed Development would reduce the use of a field from arable to grazing only. A standard pole footprint where it would be neither practical nor possible to carry out agricultural operations would be a maximum of approximately 40m², or 0.004 hectares which is equivalent to 0.010 acres. This is based on a pole separation of 3 metres, pole diameter of 0.50metres, and a working area buffer of 2 metres. Please refer to the Design and Construction Report (DCO Document Reference 7.1). Such a minimal reduction in field working area should not adversely affect agricultural operations to the extent suggested by Mr Jones.</p>
	<p>3) Woodland</p> <p>There are a significant number of mature trees and small scattered pockets of woodland along the Berain section of the draft route. National Grid has indicated that a considerable number of trees will have to be felled to provide sufficient clearance for the proposed draft route. Mitigation through ecological improvements have not been clearly indicated and can not be accepted as even further lost of agricultural land. It could even affect the efficiency of farming activities to the extent that existing field boundaries would need to be cleared to create new fields along the route of the proposed overhead power-line route.</p>	<p>Landscaping plans Sheet 7 (DCO Document Reference 2.6.7) and Sheet 8 (DCO Document Reference 2.6.8) detail the woodland and hedge planting plans. All of the planting proposed are adjacent to field boundaries or existing hedge lines. That is, they will not impinge upon the main working areas of agricultural fields.</p> <p>Further, it is a generally accepted agricultural principle that trees and woodland can make a positive contribution to agriculture, including providing shade and shelter, prevention of erosion, protection of water resources, as well as having conservation and wildlife benefits.</p>
	<p>4) Farming and Associated Business</p> <p>The proposed route runs directly across the farm of Berain. We aim to be a dynamic and expanding business and have worked exceptionally hard to build up this business over four generations and it would be inequitable and unjust for this to be undone by a decision to erect the power-line across the land, when a significantly less detrimental underground alternative route is available. This would have an affect on all future farming activities and will cause restrictions on developments and devalue the land.</p>	<p><u>Land Values</u></p> <p>Please refer to SP Manweb's Response to Relevant Representations Document (SPM NWWFC RR Document 1) submitted as part of SP Manweb's Deadline 1 Submission. Section 3.3 considers the financial impact to business, property and practice and future expansion plans and section 3.4 considers the financial impact of the Proposed Development on property values.</p>
	<p>Summary</p> <p>The Jones Family are opposed in principle to the proposed scheme on the grounds:-</p> <ul style="list-style-type: none"> i. That the processes that have been adopted does not facilitate an Environmental Impact Assessment of the overall scheme. ii. That the process involved during the discussions and consultations has not been conducted effectively and properly. iii. That it is an infrastructure project that is economically unsustainable. iv. That the proposed route dissects the Berain land and makes for an inefficient, 	<p>In summary:</p> <ul style="list-style-type: none"> i. There is no breach of the Environmental Impact Assessment Regulations. The Environmental Statement submitted in support of the Proposed Development assesses the Proposed Development cumulatively with the Wider Scheme and the Wind Farms. ii. The statutory consultation process has been carried out in accordance with the Planning Act 2008. The Secretary of State has considered SP Manweb's consultation and has determined that it has met the requirements of the Planning Act 2008. This is not a matter

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	<p>disruptive and detrimental effect on the farming activities.</p> <p>v. That the overhead power-line has a detrimental visual impact on the historic property and surrounding parkland landscape at Berain.</p> <p>We all wish to register our wish to be represented within the following planning hearing processes;</p> <p>Notification of wish to make oral representations at the issue specific hearings · Notification of wish to speak at an open floor hearing · Notification of wish to speak at a compulsory acquisition hearing · Notification of wish to attend the accompanied site inspection, suggested locations and justifications</p> <p>Finally, if National Grid are not minded to accept any of the above suggestions and resolutely remain committed to their currently proposed route, then they should at least take note of the Berian house and underground this section to protect the listed and protected dwelling with its rich cultural history.</p>	<p>for the examination.</p> <p>iii. SP Manweb has a duty to connect and the Proposed Development is the solution for that connection that is the subject of three connection agreements. The Proposed Development is supported by the National Policy Statements and need, therefore, is not a matter for the examination.</p> <p>iv. SP Manweb has taken care in determining the Preferred Route Corridor and, where possible, mitigating and minimising impacts on the environment.</p> <p>v. The impact on the Grade II* Berain is considered to be moderate and therefore less than substantial harm.</p>
<p>Cefn Meiriadog and Glascoed Road Residents and Users Group</p>	<p><u>Cumulative Effects</u></p> <p>(a) 1.1 - The cumulative effects have failed to take into account mobility, which is a fundamental characteristic of the community. The cumulative assessment does not describe the community and their perception of those effects. In this regard, in combination and combined successive effects cannot provide an accurate measure of cumulative effect for a community characterised by constant mobility (3.38)</p> <p>(b) There has already been a large amount of development within the area and the cumulative assessment fails to take this into account (3.33).</p> <p>(c) sequential effects only assess a specific route or way and therefore is not fit for purpose - this does not engage with real life or the ELC. The User Group provide examples of an appropriate way to assess this (3.43 to 3.48)</p> <p>(d) methodology</p>	<p><u>Sequential Cumulative Effects</u></p> <p>Comments made in paragraphs 3.42 – 3.44 relate to the sequential effects experienced when a receptor is moving from one area to another, for example along a road or footpath and is able to see two or more developments (or parts of the same development) at the same time, or at different times as they pass along a route.</p> <p>Section 7.10 of Chapter 7 ‘Landscape and Visual’ (DCO Document Ref 6.7) summarises the residual assessment of effects and includes a summary of sequential effects on footpaths and bridleways (paragraph 7.10.11) and local roads and lanes (paragraph 7.10.12) .</p> <p><i>Clwydian Way</i></p> <p>An assessment of sequential cumulative effects in relation to the Clwydian Way and B4501 is presented in section 7.9 of Chapter 7 (paragraphs 7.9.99 – 7.9.107).</p> <p><i>North Wales Pilgrim’s Way</i></p> <p>The proposed 132kV Overhead Line would cross the North Wales Pilgrim’s Way at just one location near Croen Llwm Mawr. It would be clearly, but briefly, visible as it approached the North Pilgrim’s Way from Berain and oversailed the path as it headed towards the Elwy Valley slopes. The 132kV Overhead Line would be largely backclothed by rising landform and existing trees. The proposed 132kV Overhead Line would not be close to the Pilgrim’s Way as it crossed the Cefn Meiriadog ridge south and east of Bryn Cefn, north east of Bont Newydd.</p> <p>Section 7.7 of the ES (DCO document reference 6.7) assesses the likely effects on the regionally promoted North Wales Pilgrim’s Way. Specifically, sections 7.7.79, 7.7.117 – 7.7.119 and 7.7.125 of Section 7.7 assesses these specific effects. This assessment is also undertaken at 3.10 and section 7.10 of the ES.</p> <p>Where structures are located close to the North Wales Pilgrim’s Way, new tree and hedgerow planting has been proposed to help offset any effects.</p> <p>Whilst, in time, this would compensate for some of the adverse visual effects, Section 7.10 of the ES (DCO document reference 6.7) acknowledges that it is not be possible to screen</p>

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		<p>views of all structures and the residual effect on short sections of the trail is likely to remain locally moderate. However, it is important to note that this effect would be transient and localised.</p> <p>A specific assessment of effects on the B4501 and minor road past Tan Yr Allt was prepared as part of the response to interested parties on their responses to the FWQ (Q 0.1). This is reproduced below.</p> <p><i>B4501</i></p> <p>Within the study area, the B4501 runs broadly northeast to southwest between Denbigh and Llyn Brenig. The road passes through the settlement at Peniel close to where the Proposed Development oversails the road, and then to the west of the settlement at Saron, where the Proposed Development runs parallel and east of the B4501 (generally more than 370m from the road) as the Proposed Development heads towards the shoulder of Tir Mostyn and Clocaenog Forest. The road then continues to Llyn Brenig before leaving the study area. The sensitivity of users of this road is considered medium. Visibility of the Proposed Development from this road varies depending on distance, direction of view, topography and the screening effect of any roadside vegetation, including hedgerows and trees. The greatest effects will be felt as the Proposed Development oversails the road north of Peniel. The Proposed Development is also likely to be visible in views to the south and the north east as it approaches and runs over the ridge east of Foel Gasyth (likely to be seen in views over 1km from the road), and as it runs over fields on the approach to the shoulder of Tir Mostyn (likely to be seen in views over 500m from the road), resulting in a medium magnitude of change, and a moderate and therefore significant localised and transient effect from the road. This conclusion is reflected in the assessments of Viewpoints 2, 3 and 5 which identify a moderate effect in this area.</p> <p><i>Minor Road Past Tan Yr Allt</i></p> <p>The minor road runs broadly east to west north of Saron along the shoulder of the ridge which runs east of Foel Gasyth. At its closest point, the road is oversailed by the Proposed Development near Tan Yr Allt, as the Proposed Development runs north over the ridge. The Proposed Development then continues in a northerly direction whilst the road runs east-west. The sensitivity of users of this road is considered medium. Visibility of the Proposed Development from this road varies depending on distance, direction of view, topography and the screening effect of any roadside vegetation, including hedgerows and trees. The greatest effects will be felt as the Proposed Development oversails the road. There are no views of the Proposed Development once it has passed north over the ridge. The Proposed Development is likely to be visible in views to the south as it heads in the direction of the B5435 (some 1.3km away), as it runs over fields adjacent to the poultry farm at Bryn Golau (some 1.6km away), and as it passes southwest along the shoulder of Tir Mostyn (some 2.4km away), resulting in a medium magnitude of change, and a moderate and therefore significant localised and transient effect from the road. This conclusion is reflected in the assessments of Viewpoints 2 and 3 which identify a moderate effect in this area.</p> <p><i>Minor Road South of Saron</i></p> <p>The minor road runs broadly west to east north of Moel Ytta and south of Saron. At its closest point, the western end of the road lies approximately 90 m to southeast the</p>

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		<p>Proposed Development. The Proposed Development then continues in a northeasterly direction whilst the road runs east. The sensitivity of users of this road is considered medium. Visibility of the Proposed Development from this road varies depending on distance, direction of view, topography and the screening effect of any roadside vegetation, including hedgerows and some scattered trees. The greatest effects will be felt to the western end of the road. The Proposed Development will be visible as it runs northeast over fields adjacent to the poultry farm at Bryn Golau, before crossing over the B5435 and becoming obscured as it heads into lower lying areas screened by topography and vegetation. The Proposed Development will be briefly visible as it crosses the ridge east of Foel Gasyth some 1.8 km away. The Proposed Development will also be visible in views from the western end road as it runs southwest along the shoulder of Tir Mostyn, resulting in a medium magnitude of change, and a moderate and therefore significant localised and transient effect to the western end of the road. This conclusion is reflected in the assessments of Viewpoints 2 and 3 which identify a moderate effect in this area.</p> <p>In response to this comment, a specific assessment of effects on the B5381, Groesffordd Marli to Glascoed Rd and Groesffordd Marli to Cefn Meiriadog Road and minor road past Tan Yr Allt has been prepared and is presented below.</p> <p><i>B5381 Glascoed Road</i></p> <p>Within the study area, the B5381 Glascoed Road runs broadly east to west between St Asaph and Betws-yn-Rhos, and then continues west in the direction of Conwy. The road runs north of the settlement at Groesffordd Marli approximately 700m from the terminal pole of the Proposed Development. The sensitivity of users of this road (including the local community and visitors to the area) is considered medium. The Proposed Development is visible in some views from the B5381 as it crosses the Cefn Meiriadog ridge from southeast to northwest before terminating at the terminal pole. At this location, the road is flanked by low-lying pastures bounded by a mixture of post, wire and wood fencing and mature hedgerows with some scattered hedgerow trees. The low lying fields continue in the direction of the Cefn Meiriadog before rising up the ridge, and are crossed by existing overhead lines, including 132 kV and 400 kV pylons, which are prominent in the skyline. Visibility of the Proposed Development from this road varies depending on distance, direction of view, and the screening effect of any roadside vegetation and intervening vegetation, including hedgerows and trees and small woodland blocks. The greatest effects will be experienced as the Proposed Development skylines on the ridge in unobscured views from the road. A maximum of 3 or 4 structures are likely to be visible but partially obscured by vegetation, with potential for one or two of the wood pole structures to be fully or partially skylined on the ridge some 700m minimum from the road. No other sections of the Proposed Development will be visible from the B5381. This would result in a small magnitude of change, and a minor and therefore not significant localised and transient effect on views from the road. This conclusion is reflected in the assessments of Viewpoint 40 which identify a minor effect in this area.</p> <p><i>Groesffordd Marli to Glascoed Rd</i></p> <p>The minor road connects residents and visitors of Groesffordd Marli to the B5381 and broadly runs east to west between Pentre Mawr and Tyddyn Eos with connecting northerly spurs to the Glascoed Rd from each end. The road runs through the scattered settlement at Groesffordd Marli approximately 190m from the terminal pole of the Proposed Development at its closest point. The sensitivity of users of this road (including the local</p>

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		<p>community and visitors to the area) is considered medium. The Proposed Development is visible in some views from the road as the Proposed Development crosses the Cefn Meiriadog ridge from southeast to northwest before terminating at the terminal pole. The road is flanked by low-lying or sloping pastures bounded by a mixture of post, wire and wood fencing and mature hedgerows with some scattered hedgerow trees. The adjacent fields continue in the direction of the Cefn Meiriadog before rising up the ridge, and are crossed by existing electricity networks including 132 kV and 400 kV pylons, which are prominent in the skyline. Visibility of the Proposed Development from this road varies depending on distance, direction of view, and the screening effect of any intervening residential properties, roadside vegetation and intervening vegetation, including hedgerows and trees and small woodland blocks. The greatest effects would be experienced as the Proposed Development skylines on the ridge in unobscured views from the road. A maximum of 3 or 4 wood pole structures are likely to be visible but would be partially obscured by vegetation, with potential for one or two of the structures to be fully or partially skyned on the ridge. No other sections of the Proposed Development is likely to be visible from the B5381. The introduction of the Proposed Development would result in a small magnitude of change, and a minor and therefore not significant localised and transient effect from the road. This conclusion is reflected in the assessments of Viewpoint 40 which identify a minor effect in this area.</p> <p><i>Groesffordd Marli to Cefn Meiriadog Road</i></p> <p>The minor road runs broadly northeast to southwest and lies on the northeastern slopes of the Elwy Valley and just south of the Cefn Meiriadog ridge. The road is flanked by pastures bounded by mature hedgerows and mature trees, and scattered residential properties. The sensitivity of users of this road (including the local community and visitors) is considered medium. At its closest point near Plas Hafod, the Proposed Development would oversail the road. Visibility of the Proposed Development from this road varies depending on distance, direction of view, topography and the screening effect of any adjacent residential properties, roadside vegetation, including hedgerows and mature hedgerow trees. The greatest effects would be experienced near Plas Hafod and Maes as the Proposed Development oversailed the road. The Proposed Development is likely to be visible but partially obscured as it runs northeasterly over fields adjacent to Plas Hafod and some 3 wood pole structures would potentially be visible to the southeast, before crossing over the road and approaching the Cefn Meiriadog ridge where it will briefly skyline, some 3 wood pole structures potentially visible. The Proposed Development leaves the view as it crosses the ridge and heads down towards Groesffordd Marli. There is also potential for the Proposed Development to be visible in views of the southern slopes Elwy Valley as it runs across the opposite ridge approximately 1km to the south. The introduction of the Proposed Development would result in a medium magnitude of change, and a moderate and therefore significant localised and transient effect depending on the level of intervening vegetation screening. This conclusion is reflected in the assessments of Viewpoints 34 and 37 which identify a moderate effect in this area.</p> <p><i>Summary</i></p> <p>The assessment predicted a number of moderate effects on views and visual amenity which would be experienced by people moving about the area generally up to 2km from the proposed 132kV Overhead Line.</p> <p>Much of the study area is undulating or rolling farmland with generous amount of tree</p>

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		<p>cover. It is a rural landscape with few settlements but a scattering of dispersed farmsteads, houses and hamlets, connected by a network of roads and narrow, often winding lanes. The majority of these are bounded by mature hedgerows, which is a critical factor affecting views and visibility from the road network as people move around the area, as it is often only possible to appreciate the wider view through field gates. Elsewhere, and beyond and above the confines of hedges, visual containment is provided primarily through tree cover, particularly the layering effect of the many field boundary trees. Much of the Proposed 132 kV Overhead Line is likely to be visible over a relatively short distance (2 – 3 fields), with visibility curtailed by vegetation. The Proposed Development would not be a particularly noticeable component in most views.</p> <p>There are, however, other features of the landscape which affect visibility and opportunities for views.</p> <p>Land rises to the south, there is less vegetation to screen views and longer views would be afforded from lanes around Tir Mostyn and Foel Gasyth. The landscape around the A543 east of Groes is more open and would also be a location from which people are likely to have more frequent views of the 132 kV Overhead Line as they move around the area.</p> <p>In addition to the network of roads and winding lanes, the landscape is crossed by a comprehensive network of public rights of way. Whilst the number of visual receptors using the footpath network may be relatively few, their attention is likely to be focussed on the landscape and on views. Although users of these footpaths would be variably affected by the Proposed Development depending on the particular locality and its landscape characteristics, where the line is seen close to these footpaths, the effect on visual amenity may be significant, although this effect will diminish rapidly with distance.</p> <p>These effects can generally be expected from a development of this type and are typically contained, with the degree of significance decreasing rapidly with distance from the Proposed Development.</p> <p><u>(b) Developments Included in the Cumulative Assessment</u></p> <p>The Users Group sets out at paragraph 3.45 the development that it considers should be considered as part of the cumulative assessment.</p> <p>SP Manweb's environmental assessment includes a cumulative assessment and the developments that are considered as part of this assessment is included in Chapter 4 of the ES 'EIA Methodology' (DCO Document Ref 6.4) (see updated table in response to FWQ 6.14 in DCO Document Reference SPM NWWFC ExA1). Most of the developments referred to in the Written Representation is development that has already taken place and therefore they are not included in the list of developments that are listed in the cumulative assessment. This is because they form part of the baseline against which the Proposed Development has been assessed. This chapter also identifies which projects have been included in the assessment of combined and cumulative effects. This is also discussed in SP Manweb's response to Relevant Representations presented in section 6 of RR Document 1.</p> <p>Any other projects referred to in the response are considered unlikely to give rise to cumulative effects when seen alongside the Proposed Development.</p> <p><u>(c) Sequential Cumulative Effects</u></p> <p>Section 7.7.94 in Chapter 7 of the ES (DCO document reference number 6.7) explains that</p>

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		<p>the Final Route Alignment is a response to detailed desk study and field survey work to identify a route which would minimise the likely effects on views and visual amenity. A 132kV Overhead Line would be visible in the landscape, but the scale of the wood pole support chosen means that it sits below the horizon formed by the tree canopy and being constructed of timber blends well into the (largely) well-treed landscape.</p> <p>Although some significant landscape effects are likely to arise, these would be localised and have been assessed as moderate. In time, the secondary measures proposed, including hedgerow reinforcement and new hedgerow trees, would further help to screen views.</p> <p>The assessment predicted a number of moderate effects on views and visual amenity which would be experienced by people moving about the area generally up to 2km from the proposed 132kV Overhead Line. These significant effects would typically only be experienced where the proposed 132kV Overhead Line would appear in the foreground of a view and in the more open upland areas to the south of the route near Tir Mostyn and Foel Gasyth. In many middle distance and longer views, the appreciable screening and backdropping afforded by the coalescence of layers of vegetation, particularly in the undulating farmland, will generally be effective in reducing the visibility. In these instances, the Proposed Development would not be a noticeable component in the view and would therefore be unlikely to give rise to significant visual effects.</p> <p>These effects can generally be expected from a development of this type and are typically contained, with the degree of significance decreasing rapidly with distance from the Proposed Development. None of the effects is assessed as major.</p> <p>It is recognised in paragraph 5.9.18 of NPS EN-1 that '<i>All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>'. <i>The [IPC] will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.</i>' Based on its LVIA assessment, which sets out the effects of the Proposed Development, and after considering the representations made about visual effects, SP Manweb concludes that the DCO application should still be made.</p> <p><u>(d) Methodology</u></p> <p>The approach to cumulative assessment is described in Chapter 4' of the ES EIA Methodology (DCO Document Reference 6.4) methodology</p> <p>The methodology used for the assessment of cumulative landscape and visual effects accords with guidance provided in GLVIA3 as explained in section 7.9 of Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7).</p>
	<p><u>Historic Environment</u></p> <p>The Ancient Way known as "the old land" for Works Access will be affected during the construction phase. Knowledge that there will be a harmful effect is based on the local knowledge of the route and the contractors that will be employed. This is also known as the "bridle path" (4.1 to 4.11 inclusive)</p>	<p>SP Manweb can confirm that, as shown on the relevant Land, Works and ARoW plans (all sheet 13), the referenced track is not within the Order Limits of the Proposed Development. SP Manweb is not proposing to utilise the track for construction works or access to and from the construction works. .</p>
	<p><u>Undergrounding</u></p> <p>The Group disagrees that the undergrounding will be likely to cause more harm than</p>	<p>In response to the User Groups comments regarding undergrounding (paragraphs 3.50 – 3.52 inclusive):</p>

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	<p>the proposed overhead line, based on SP Manweb's own assessment of underground. Due to the exceptional nature of the landscape, the effects of double pole line and insufficiency of mitigation measures, the entirety of the line should be undergrounded (2.1), (3.50 to 3.52), (3.78 to 3.89 inclusive).</p>	<p>SP Manweb has addressed the issue of placing the Proposed Development underground in the following documents:</p> <ul style="list-style-type: none"> • The Planning Statement (DCO document reference 7.4) and supporting Technical Appendix (DCO document reference 7.5) look at the need for undergrounding specifically in this location in detail and conclude that the Proposed Development does not meet the "serious concerns" test set out in NPS EN-5 and therefore it is acceptable for an overhead line to be proposed for this project. • SP Manweb's response to Relevant Representations (SPM NWWFC RR Document 1 submitted as part of SP Manweb's Deadline 1 Submission) Section 19 provides further information regarding SP Manweb's decision to route the Proposed Development overhead and the costs associated with placing the development underground. <p>The ExA sought clarification from SP Manweb regarding costs in their FWQs:</p> <ul style="list-style-type: none"> • SP Manweb's response to FWQs 1.17 provides further clarification regarding the underground route used for the comparison in the Technical Appendix to the Planning Statement (DCO document reference 7.5). The response explains the background to the underground route and the approach to costs for such a route. It also breaks down the costs for the overhead line option and a wholly underground option and explains the elements that make up the costs. It goes on to explain the factors that influence the installation costs for underground cables. • SP Manweb's response to FWQs 1.18 sets out in detail the alternative technologies considered in the process of selecting options, including wood pole lines and undergrounding. The response includes a comparison of costs for the different technologies including installation and maintenance costs for the lifetime of the Proposed Development. <p>SP Manweb has also responded to the ExA regarding FWQ 8.1. The response confirms that SP Manweb has carried out a detailed environmental assessment of the Proposed Development and this is reported in the ES (DCO document references 6.1-6.28). The Planning Statement assesses the Proposed Development against relevant planning policy, from National Policy Statements (NPS) to local authority development plan policies.</p> <p>SP Manweb has considered the 132kV Overhead Line in the context of the policy in National Policy Statement (NPS) EN-5. Paragraph 2.8.2 of National Policy Statement EN-5 states that "<i>Government does not believe that development of overhead lines is generally incompatible in principle with developers' statutory duty under section 9 of the Electricity Act 1989 to have regard to amenity and to mitigate impacts.</i>" EN-5 acknowledges in paragraph 2.8.2 that wooden poles "<i>can give rise to adverse landscape and visual impacts, dependent upon their scale, siting, degree of screening and the nature of the landscape and local environment through which they are routed.</i>" However, EN-5 also acknowledges in paragraph 2.8.2 that for "<i>the most part these impacts can be mitigated.</i>"</p> <p>SP Manweb considers the wood pole design facilitates compliance with this obligation in that it results in lower impacts on the environment and enables more sensitive routeing through the landscape. EN-5 notes, however, that where there are "serious concerns" about the potential adverse landscape and visual impacts of a proposed overhead line, the decision maker will have to balance these against other factors including the need for the proposed infrastructure, the availability and cost of alternative routes, technical difficulties and likely costs of undergrounding, as well as the benefits and any impacts of undergrounding along any of the identified sections.</p>

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		<p>There is no definition of "serious concerns" in EN-5, but SP Manweb has previously interpreted this term to mean adverse significant landscape and visual effects that are over and above that expected for this type of project. In the context of an overhead line, this is taken to be a major adverse effect as identified in the ES for the Proposed Development.</p> <p>The logic behind this is simple: the Government accepts (as set out above) that overhead lines will generally be appropriate as well as expressly recognising that NSIPs, including electricity networks infrastructure projects, will inevitably cause some harm. If that is so, "serious concerns" must be pitched at a higher level of harm than would be an ordinary incident of projects of the scale of NSIPs. It is for this reason that NPS EN-5 refers to the need to undertake a very specific exercise to consider alternatives, including undergrounding, only where the landscape and visual effects are particularly significant. This approach is corroborated by the Inspector's conclusions on the SP Manweb's Legacy to Oswestry Scheme. Paragraph 267 of the Inspector's Report states: "<i>Furthermore, EN-5, which provides important guidance, sets a high threshold for refusing overhead lines in favour of undergrounding.</i>" This position was adopted by the Secretary of State in his decision letter in which he explicitly accepts "<i>the Inspectors' conclusions and recommendations as set out in paragraphs 210 to 273 of the report.</i>" Further, the Inspector for the Llandinam 132kV Overhead Line inquiry has equated a major effect as giving rise to "serious concerns" (see paragraph 410 for example of his report).</p> <p>Paragraph 2.8.9 of EN-5 provides direction for the key matters to be considered in concluding whether the benefits of an underground cable would outweigh the dis-benefits. As to LVIA matters, the policy specifically highlights the need to consider designated landscapes. It is not suggested that these are the only landscapes that are relevant but it is plain that designated landscapes are those the Government had at the forefront of its thinking in drafting its undergrounding policy and should attract the most weight in the decision-making process. It is important to note that the Proposed Development does not run through a designated landscape in the vicinity of Cefn Meiriadog. The early stages of the route development specifically looked to avoid the designated landscape in this area.</p> <p>It follows that paragraphs 2.8.8 and 2.8.9 of NPS EN-5 requires the route of a proposed overhead line to be assessed along the following lines:</p> <p>c. Is there a "<i>particularly sensitive location</i>" along the route of the 132kV Overhead Line where the effects of the 132kV Overhead Line in that locality would give rise to "<i>serious concerns</i>".</p> <p>If the answer is in the affirmative, then is this an "<i>exceptional circumstance</i>", where undergrounding the line would bring "<i>very significant benefits</i>", which would "<i>clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable</i>".</p> <p>A number of moderate, and therefore significant, landscape and visual effects, including cumulative landscape effects, have emerged from the EIA process with the Cefn Meiriadog ridge being identified as part of this process. The level of significance of these effects does not give rise to the "serious concerns" required by EN-5. As such, SP Manweb has not seen a need to assess the areas where these effects arise further against the considerations referred to in EN-5.</p> <p>SP Manweb has considered a wholly underground design and considers this cannot be justified given Government policy accepts the need for overhead lines and the relatively higher costs of such a scheme in this case. Further, whilst a connection can be achieved by overhead line or undergrounding, undergrounding the entire length of the route would not provide an economic and cost effective solution (thus contrary to section 9 of the Electricity Act 1989). Given that National Policy Statement EN-5 sets a high threshold for</p>

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		<p>refusing overhead lines in favour of undergrounding and TAN 8 explicitly states that undergrounding is likely to be justified for only limited lengths of a connection and / or in special circumstances, a fully underground option would not be an appropriate means of providing the connection.</p> <p>SP Manweb has also had regard to concerns raised in consultation feedback regarding visual amenity effects on existing views.</p> <p>It should be noted that SP Manweb's approach is conservative: whilst NPS EN-5 does not refer to cumulative effects in the context of undergrounding, SPM has considered cumulative effects in its assessment.</p> <p>In summary, SP Manweb regards the above assessment as a reasonable approach to the matter of considering undergrounding options, addressing and testing consultation responses and to assist the consideration of the project as a whole.</p> <p>As highlighted by the IP in paragraph 3.51, SP Manweb is proposing to underground the circuit from the St Asaph substation to the terminal pole. The requirement for an underground cable section was identified early on in the project development and SP Manweb considered this the best option in this location. The reasons for this decision are set out below.</p> <p>There are two existing high voltage overhead lines already in the vicinity of St Asaph Substation, namely the National Grid 400kV transmission line and the SP Manweb 132kV double circuit tower line. Construction of overhead lines underneath existing National Grid transmission lines can be difficult and may require closures of the transmission line during construction. It is not possible to route the Proposed Development underneath the SP Manweb 132kV double circuit tower line due to the requirement for set safety clearances between electrical circuits.</p> <p>There is also a large amount of built development surrounding St Asaph Substation, with plans for additional electrical infrastructure (for example the Burbo Bank Extension substation and underground cables). It was not possible to identify a suitable overhead line route through this built development into the St Asaph substation.</p> <p>Due to the technical and built constraints identified SP Manweb decided to proceed with an underground cable section in this area. Ground investigation works have been undertaken to confirm the conditions within which the underground cable will be laid.</p> <p>With regards to the decision by DONG Energy to route the Burbo Bank Extension connection underground, SP Manweb is not in the position to request that a developer pays for an underground connection. As explained in SP Manweb's response to FWQ 2.5, the Distribution Licence under which SP Manweb operates sets out parameters within which a connection should be delivered. It includes those set out in legislation, codes and conditions, which include SP Manweb's statutory duty to be economical and efficient as set out in section 9 of the Electricity Act. DONG Energy are not a statutory undertaker.</p>
	<p><u>Landscape and Visual</u></p> <p>(a) SP Manweb has not engaged with the fundamental requirements of the European Landscape Convention, taking into account importance of the perceptual and experiential aspects of landscape, thereby failing to assess the harm that would be caused to the landscape as it affects Cefn Meriadog. The users group consider that</p>	<p>(a) and (b) In relation to the choice of route alignment, refer to SP Manweb's Response to Relevant Representations (RR No. 11, 13, 34, 37, 39, 65, 71 and 73) presented in Section 16.11 (DCO Document Reference SPM NWWFC RR Document 1) and to the rationale for the route alignment presented in Section 19.5 of RR Document 1.</p> <p>a) <i>The European Landscape Convention</i></p>

Respondent	Written Representation	SP Manweb Response
	<p>this document does not supersede the Holford Rules but attaches greater weight to it</p> <p>(b) Natural England's Guidelines for Implementing the ELC, Part 2 at para 2.22, emphasises the importance of perception of the landscape by people. The applicant however only applies professional judgement. Furthermore, the layperson cannot understand the "jargon" of the document.</p> <p>(c) Professionals' aim is to assess that the project is acceptable (i.e. bias)</p> <p>(d) "Moderate" assessment is an understatement (3.12)</p> <p>(e) Cefn Meriadog is a particularly important area and people have chosen to live there because of the beautiful landscape (3.11)</p> <p>(f) Overhead line will be visible for several miles from Viewpoint 34.</p>	<p>The European Landscape Convention seeks to promote landscape protection, management and planning across Europe, and to organise European-wide co-operation on landscape issues. The first aim of the European Landscape Convention is to encourage States to introduce a national landscape policy that is not restricted to the protection of exceptional landscapes but also takes everyday landscapes into consideration. This was acknowledged by SP Manweb in the assessment of landscape value presented in Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7).</p> <p>Table 7.4 of Chapter 7 presents the criteria which were used to assess the relative value of the landscapes in and around the study area. It includes criteria relating to perceptual and experiential aspects. Paragraphs 7.7.49 of Chapter 7 state that this type of criteria-based approach <i>"is in line with the European Landscape Convention which promotes an 'all landscapes' approach, founded on the recognition of value in all landscapes."</i></p> <p>Criteria relating to perceptual and experiential aspects of the landscape were also included in the assessment of the susceptibility of the landscape to the Proposed Development.</p> <p>The judgements on both landscape value and landscape susceptibility were then used in the assessment process. by adopting this approach, the predicted significance of effect included consideration of Perceptual and experiential aspects of the local landscape.</p> <p>SP Manweb therefore maintains that the Proposed Development accords with the principles of the European Landscape Convention.</p> <p><i>b) Perceptual and experiential aspects</i></p> <p>Perceptual aspects of the landscape such as tranquillity, wildness, scenic quality and remoteness were amongst the criteria considered when making judgements on the susceptibility and value of the different landscapes along the Proposed Development. These criteria are presented in Tables 7.3 and 7.4 of the Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7). Areas which are wild, remote, tranquil and of high scenic quality are more likely to be influenced by the presence of overt man-made structures, or visual or audible intrusion and therefore are more likely to be of higher value and more susceptible to the Proposed Development (although tranquillity is one of a number of other criteria which have to be balanced in order to arrive at judgements on value and sensitivity). The judgement on value and susceptibility was then considered alongside the predicted magnitude of change to give an overall evaluation on significance of effect. Any effect judged to be moderate or major is considered significant. Consideration of tranquillity was therefore built into the assessment process presented in Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7).</p> <p>The Cefn group has said that the layperson cannot understand the jargon of the document. SP Manweb considers the documents forming the ES and the application as a whole to be clearly labelled and referenced, ordered and easy to follow. All appendices to the ES are clearly set out and support the main body of the ES. The entirety of the ES findings are contained within the main chapters of the ES which enables a clear understanding of the conclusions reached. A glossary has been provided to explain any technical terms within the documents.</p> <p>SP Manweb considers that the ES is completely transparent in the approach undertaken which is in accordance with the relevant legislative requirements.</p> <p><i>(c) Potential 'Bias'</i></p>

Respondent	Written Representation	SP Manweb Response
		<p>The EIA team including the landscape architects provides, at all times, independent, expert advice. Each consultant undertakes their assessment work within the EIA in accordance with their statutory and regulatory requirements and in accordance with best practice and guidance. The EIA team acts objectively and professionally in order to ensure that a full and accurate assessment has been undertaken, which is then fully documented within the ES.</p> <p>d) <i>Understatement of 'Moderate'</i></p> <p>The assessment of landscape and visual effects has been undertaken in accordance with GLVIA3.</p> <p>As summarised in Table 7.20 of Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7), in terms of the likely significant effects on the Afon Elwy Valley, the following VSAs were assessed as likely to experience 'moderate' and therefore significant effects.</p> <ul style="list-style-type: none"> • Afon Elwy Valley – East • Upper Elwy Valley • Limestone valley - Cefn <p>To tip the effect into the 'major' category, the Proposed Development would have to result in a large amount of change in landscape character and would conflict with or override its key characteristics. There would have to be a major loss of/ or change to existing elements/ features or aesthetic aspects of the landscape and/ or the introduction of major new and uncharacteristic elements/ features or major change to aesthetic attributes. Overall the Proposed Development would have to be very prominent and have a strong influence on the perception of the landscape.</p> <p>SP Manweb's response to CCBC WR section 6.2.1 (ii) and 6.2.5 explains in more details how the magnitude of predicted change and significance of landscape effect have been assessed.</p> <p>SP Manweb maintains its view that the effects have not been underestimated.</p> <p>e) <i>Cefn Meiriadog</i></p> <p>Visual Effects</p> <p>An assessment of the effects of the Proposed Development on the landscape and views in and around Cefn Meiriadog, including the limestone ridge is presented in Chapter 7 'Landscape and Visual' (DCO document Ref 6.7). SP Manweb maintains the view that this document presents an accurate assessment of the effects.</p> <p>Paragraph 7.7.125 of Chapter 7 'Landscape and Visual' (DCO Document Ref 6.7) concludes that there would be likely significant visual effects on views from:</p> <ul style="list-style-type: none"> • <i>from clustered properties, local lanes, and the network of public footpaths on the northern slopes of the Cefn Meiriadog, which lie close to the Proposed Development where it is likely to skyline as it crosses the ridge."</i>

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		<p>Landscape Effects</p> <p>Paragraph 7.7.48 of Chapter 7 ‘Landscape and Visual’ (DCO Document Ref 6.7) concludes that there would be likely significant landscape effects on:</p> <p><i>“the landscape of the Cefn Meiriadog Ridge (Limestone Valley – Cefn) would experience a moderate effect which would be significant, albeit on the low side of moderate.”</i></p> <p>This means that there are likely to be moderate effects on landscape which will be experienced by people moving through it.</p> <p>Although moderate, none of the effects were judged to be major and therefore as explained in response to CCBC WR section 4.1-4.14 SP Manweb does not consider that they give rise to ‘serious concerns’ and therefore consideration of undergrounding.</p> <p>The identification of some significant landscape and visual effects is not unusual and is acknowledged in NPS EN-1 (paragraphs 5.9.8 and 5.9.18). The introduction of some 215 (circa 13m high) structures into the rural landscape of North Wales will inevitably result in some significant landscape and visual effects. The double wood pole structure chosen is of an appropriate scale (similar in height to mature trees, and generally lying below the horizon formed by the tree canopy) and is constructed from a material which sits well within this (largely) well-treed landscape. Combined with the careful route which has been selected, this embedded mitigation would reduce the likely effects.</p> <p>SP Manweb considers that the predicted effects of the Proposed Development are proportionate to the type of development proposed and to the type of landscape in which it is located. As explained in response to CCBC’s WR Section (4.1 – 4.14) SP Manweb does not consider that they give rise to ‘serious concerns’ and therefore consideration of undergrounding.</p> <p><i>(f) Overhead line will be visible for several miles from Viewpoint 34.</i></p> <p>Appendix 7.3 ‘Assessment of Operational Effects upon Selected Viewpoints’ (DCO Document Ref 6.20.3D) provides a detailed assessment of the effects from Viewpoint 34.</p> <p>The assessment concludes that when the magnitude of visual effect (medium) is correlated against the overall sensitivity of the viewpoint (high), the effect on visual amenity arising from the Proposed Development will be moderate and therefore significant. The Proposed Development introduces a manmade feature in a rural landscape. Approximately three sections (900m in total) of the Proposed Development would be perceptible in the wider landscape as it crosses higher open ground along the southern slopes of the Elwy Valley, but would be backclothed. These visible sections are likely to be more than 1.2km from the viewpoint. Wood poles would be in scale with the surrounding landscape features (mature trees) and would recede in the wider pastureland. The Proposed Development would follow the pattern of the landscape, and would add to the effect of a small number of existing scattered 11kV Overhead Lines, but due to intervening distance and backgrounding, these combined effects are considered not significant.</p>
	<u>Landscape and Visual</u>	Paragraph 7.7.48 of Chapter 7 ‘Landscape and Visual’ (DCO Document Ref 6.7) concludes

Respondent	Written Representation	SP Manweb Response
	The adverse impact of the Proposed Development on the Bryn (3.13)	<p>that there would be likely significant effects on:</p> <p><i>“the landscape of the Cefn Meiriadog Ridge (Limestone Valley – Cefn) would experience a moderate effect which would be significant, albeit on the low side of moderate.”</i></p> <p>This means that there are likely to be moderate effects on landscape which will be experienced by people moving through it.</p> <p>The identification of some significant landscape and visual effects is not unusual and is acknowledged in NPS EN-1 (paragraphs 5.9.8 and 5.9.18). The introduction of some 215 (circa 13m high) structures into the rural landscape of North Wales will inevitably result in some significant landscape and visual effects. The double wood pole structure chosen is of an appropriate scale (similar in height to mature trees, and generally lying below the horizon formed by the tree canopy) and is constructed from a material which sits well within this (largely) well-treed landscape. Combined with the careful route which has been selected, this embedded mitigation would reduce the likely effects.</p> <p>SP Manweb considers that the predicted effects of the Proposed Development are proportionate to the type of development proposed and to the type of landscape in which it is located. As explained in response to CCBC's WR Section (4.1 – 4.14) SP Manweb does not consider that they give rise to 'serious concerns' and therefore consideration of undergrounding.</p>
	<p><u>Landscape and Visual</u></p> <p>Viewpoints: Viewpoints of the crematorium (3.13), Viewpoints 34, 37, 39, 40 (3.14) are all incorrect, erroneous or inadequate. The User Group suggest a more appropriate selection of viewpoints.</p>	<p>Viewpoints are used in the LVIA and CLVIA to illustrate the effects of the Proposed Development to interested parties. Landscape architects are trained to provide a judgement on significance of likely effect based on desk review and site based survey without the specific need for wireframes or photomontages.</p> <p>Viewpoints 34, 37 and 39 are illustrated accurately on Figure 7.3: Viewpoint Locations and described correctly in Table 7.21 of Chapter 7 'Landscape and Visual' (DCO Document 6.7). The circle shown on Figure 7.3 indicates the location from which the viewpoint is photographed and the arrow indicates the direction of view. Coordinates are taken at the site using a GPS device, and plotted on the mapping accordingly. The symbol indicating the direction of Viewpoint 39 should have an arrow pointing towards the terminal pole location, since it is represented in the photomontage. This is therefore correct. The elevation and coordinates are recorded using a GPS tracking device and cross checks indicate that the elevation data given for Tan y Graig is correct.</p> <p>Viewpoint 37 is located less than 300m from the suggested viewpoint location near Maes and Plas Hafod, and was selected to give a representative view from:</p> <p>Local communities:</p> <ul style="list-style-type: none"> • Cluster of residential receptors <p>Recreational/Cultural receptor:</p> <ul style="list-style-type: none"> • Public Rights of Way (that lead to the Lower Elwy Valley Historic Landscape and Conwy Landscape Value Area) • Listed Buildings (Plas Newydd) <p>Users of roads:</p> <ul style="list-style-type: none"> • Local lanes

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		<p>A photomontage in close proximity to the Old Lane (ancient lane) Appendix 7.3 Part C to the ES (DCO Document Ref 6.20.C) has been prepared as a result of first written questions from the examining authority.</p> <p>Viewpoint 40 (taken from the B5381) was selected in order to illustrate the view from the B5381 where the Proposed Development would be visible as it crosses the Cefn Meiriadog ridge. This can be seen in the resultant photomontage. This location is adjacent to the field in which the crematorium is due to be constructed.</p> <p>Three additional photomontages have been prepared in response to the Examining Authority's First Written Questions and are presented in DCO Document Ref SPM NWWFC Additional Photomontages.</p> <p>SP Manweb remains of the view that the selection of viewpoints both for the LVIA and CLVIA covers a sufficiently wide range of situations as is reasonable and necessary to demonstrate the likely significant visual effects. As the selected viewpoints constitute a selection of the most sensitive viewpoints in the vicinity of the Proposed Development, visual effects likely to be experienced by other receptors are likely to be of equal or lesser significance. In addition, most of the Proposed Development is likely to be visible over a relatively short distance (2 – 3 fields), with visibility curtailed by vegetation.</p>
	<p><u>Historic Environment</u></p> <p>The adverse impact of the Proposed Development upon Plas Newydd</p>	<p><u>Plas Newydd</u></p> <p>Chapter 8 of the ES 'Historic Environment' (DCO Document Reference 6.8) identifies Plas Newydd as listed Grade II* for its special historic importance as an exceptionally well-preserved example of an Elizabethan regional gentry house. As such it derives its significance primarily from its age, fabric, form and architectural design. Its immediate setting and distant views of the Elwy valley to the south and Denbighshire hills beyond are also important.</p> <p>Field assessment of visual effects was carried out from along the route of the Proposed Development, from the road between Sinnan and Hafod which runs alongside to the east of Plas Newydd, from a public right of way to the west of the house and from various locations to the north and south of the Proposed Development, where access permissions had been granted.</p> <p>Chapter 8 of the ES (DCO Document Reference 6.8) refers to woodland to the east and west of the house. These block some middle-distance and distant views of the Proposed Development, narrowing the field of view to approximately 70°, centred to the south east.</p> <p>Chapter 8 also refers to aggregate access tracks, modern barns/kennels and "roadside furniture" (the latter should read telegraph poles). These are visible in views from the curtilage of the house, though not necessarily from the house itself. They are also visible in some views from the south east towards the house and its curtilage.</p> <p>In terms of assessing potential effects of the Proposed Development on Plas Newydd, the Historic Environment chapter determined a "Minor" magnitude of effect primarily on the distance of the asset from the Proposed Development., which is not significant. It also took into account: a) the field of vision of the Proposed Development; b) the adverse effect on key middle-distance views of the Elwy Valley; c) the unaffected key distant views of the Denbighshire hills, and d) the non-pristine nature of Plas Newydd's setting.</p> <p>It is noted that Denbighshire County Council in its Local Impact Report has stated:</p> <p>1. at paragraph 9.2.2 – "...there are no listed buildings within 100 metres of the Order</p>

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		<p><i>Limits of the route, the nearest being approximately 300 metres away at Plas Captain and Plas Newydd.</i></p> <p>2. at paragraph 9.2.3 that <i>"it is accepted that in both cases [Plas Captain and Plas Newydd] the impact on the setting of these buildings will be neutral and moderate/slight respectively."</i> The Council goes on to say at paragraph 9.3.1 that it <i>"considers the proposal would have a Neutral impact on the historic environment."</i></p>
	<p><u>Landscape and Visual</u></p> <p>User Group photographed Gillespies taking extra photomontages - high hedges and height of summer, given properties are set back this will be seriously misleading.</p>	<p>The photographers were taking baseline photographs for the preparation of three new photomontages requested by the Examining Authority as part of the First Written Questions. These new photomontages are presented in Document Ref SPM NWWFC Additional Photomontages and include:</p> <ul style="list-style-type: none"> (a) the view of the Proposed Development from the ridge near Bron Heulog (at or near Tan Yr Allt); (b) the view of the Proposed Development from Pen Parc Llwyd; and (c) the view of the terminal pole when viewed from the nearest residential properties on Groesffordd Marli to Glascoed Road. <p>Please refer to SP Manweb's response to ExA FWQ 8.17 which explains why they weren't in line with guidance.</p> <p>Further information is provided in the SP Manweb response to FWQ 8.17</p>
	<p><u>Consultation</u></p> <p>All 182 members were not consulted upon the specific issue of "mitigation", as outlined at 3.59, which is contrary to the statement made in the ES (3.59)</p>	<p>SP Manweb carried out three stages of public consultation on the Proposed Development since 2012. The Consultation Report (DCO document reference 5.1) explains in detail the consultation undertaken and the feedback received. During stage 3 statutory consultation over 2000 project newsletters and feedback forms were sent to statutory bodies (including community councils), persons with an interest in the land and the local community.</p> <p>SP Manweb held seven public exhibitions during the course of Stage 3 consultation, to which 212 people attended. In addition to the public exhibition, information points were established in Nantglyn, Saron, Groes, Henllan and Llanefydd. The information points were open throughout the consultation period (from 18 May 2014 to 28 June 2014) and provided access to copies of the Project's newsletter, feedback form and Overview Report which could be taken away by interested members of the community. The information points also provided DVDs containing copies of all of the consultation documentation, which were available to take away. Chapter 10 of the Consultation Report sets out in detail the approach to consultation.</p> <p>The Overview Report published as part of the Stage 3 consultation specifically references mitigation and SP Manweb's approach to it during the development of a project. The Preliminary Environmental Information Report also published as part of the Stage 3 Consultation sets out the different types of mitigation used throughout the project development. Both documents formed the basis of the consultation material for Stage 3.</p> <p>The responses to Stage 3 consultation received by SP Manweb are set out in Chapter 13 of the Consultation Report and include comments specifically relating to mitigation. Comments on other aspects of the Proposed Development and its potential effects, such as landscape and visual effects have led SP Manweb to consider mitigation in certain areas. Chapter 7 of the ES (DCO document reference 6.7) sets out in Table 7.23 those locations where, in addition to potential landscape and visual effects, feedback during consultation had identified a concern regarding a certain location and therefore the potential for</p>

Respondent	Written Representation	SP Manweb Response
	<p>Mitigation</p> <p>(a) Some mitigation measures are identified as "likely" whilst others "certain" (3.54 and 3.55);</p> <p>(b) There is no adequate mitigation available for Cefn Meiriadog;</p> <p>(c) The two for one replacement strategy - there are concerns from landowners as to the cost of maintaining additional trees (up to £1,300 per tree) (3.62);</p> <p>(d) concerns regarding the Glastir strategy and how this fits in with replacement trees.</p>	<p>mitigation.</p> <p>SP Manweb's approach to mitigation is presented in its Response to Relevant Representations (DCO Document Reference SPM NWWFC RR Document 1) presented in section 16.3.</p> <p>Information is also included in Section 7.4 of 'Landscape and Visual' (DCO Document Ref 6.7). This includes embedded mitigation built into the design of the Proposed Development as well as specific mitigation which is proposed in response to identified landscape or visual effects.</p> <p>Specific mitigation measures and the rationale behind them are set out in Section 7.8 of 'Landscape and Visual' (DCO Document Ref 6.7).</p> <p>In terms of consultation on mitigation proposals, feedback was received from landowners. SP Manweb has, in addition, committed to discretionary planting, which is intended to enhance the wider environment along the route and which would be delivered through negotiation with landowners, but which is not required as a result of the environment impact assessment. This is in recognition of SP Manweb's duty of care to the environment and their view that projects should go beyond those mitigation measures designed to lessen identified effects and should also seek to bring about positive improvements to the environment. The final mitigation and replacement planting will be secured through the written landscaping scheme to be approved pursuant to requirement 5 and similarly the replacement planting will be approved pursuant to requirement 7.</p> <p>Measures may include replanting of gaps in hedgerows, planting of hedgerow trees and field corners or implementation of specific hedgerow management regimes to act as a screen or enhance the general amenity of the area. They would be likely to include some of the trees which were being replaced on a two-for-one basis, where such tree planting could not be identified as part of the specific mitigation proposals. This is secured through the draft DCO Requirements, 7(1).</p> <p>The Cefngroup has also raised a concern in relation to constructions hours. SP Manweb responded to this point fully in its response to FWQ 3.23.</p>
	<p><u>Agriculture and Land Use</u></p> <p>The Group considers there has been no attempt to establish Grade 3 land classification</p>	<p>In response to paragraphs 3.62- 3.77 regarding agriculture the Welsh Government hold all ALC data. A request was made to Welsh Government Rural Affairs team who were able to provide an outline ALC map based on 1977 data, but this contains no detail on sub-division of land grade 3. Based on the information provided by Welsh Government the only way to distinguish between sub-classes 3a and 3b along the route would be to commission a new survey of the land along the Proposed Development route. From the date of commissioning a private consultant to complete this work it is likely to take several months to have a detailed map of land grades. As such, if land class 3a is considered as Best and Most Versatile, then the conservative assumption would be to treat all land within grade 3 along the proposed development as BMV.</p> <p>See also response previously provided in response to the ExAs FWQ 4.7(d): "The area within the order limits of the Proposed Development is mainly comprised of a mix of pasture for grazing and arable land. In terms of the impacts on agricultural operations following completion of the construction phase; it is considered that these will be minor because they will be limited to impacts arising from the loss of agricultural land within the footprints of the electrical poles and stays. The Proposed Development has been designed to minimise the number of poles required, whilst ensuring compliance with SP Manweb's</p>

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		<p><i>specification for 132kV Overhead Line of the kind proposed. One of the reasons this approach is taken is to minimise the effect on agriculture."</i></p> <p>Finally, it should also be noted that the extent of impact on agricultural land will be very limited in that a standard pole footprint where it would be neither practical nor possible to carry out agricultural operations would be a maximum of approximately 40m², or 0.004 hectares which is equivalent to 0.010 acres. This is based on a pole separation of 3 metres, pole diameter of 0.50metres, and a working area buffer of 2 metres. Such a minimal reduction in field working area should not adversely affect agricultural operations to any meaningful extent.</p>
	<p><u>Marginal Cost</u></p>	<p>SP Manweb's response to Relevant Representations (SPM NWWFC RR Document 1) Section 19 also provides further information regarding SP Manweb's decision to route the Proposed Development overhead and the costs associated with placing the development underground.</p> <p>SP Manweb also responded to the First Written Questions set by the Ex A as follows:</p> <ul style="list-style-type: none"> • SP Manweb's response to FWQs 1.17 provides further clarification regarding the underground route used for the comparison in the Technical Appendix to the Planning Statement (DCO document reference 7.5). The response explains the background to the underground route and the approach to costs for such a route. It also breaks down the costs for the overhead line option and a wholly underground option and explains the elements that make up the costs. It goes on to explain the factors that influence the installation costs for underground cables • SP Manweb's response to FWQs 1.18 sets out in detail the alternative technologies considered in the process of selecting options, including wood pole lines and undergrounding. The response includes a comparison of costs for the different technologies including installation and maintenance costs for the lifetime of the Proposed Development.
	<p><u>Traffic, Transport and Emissions</u></p> <p>(a) Groesffordd Marli to Glascoed Road is unsuited for works (5.1);</p> <p>(b) road use near Cae Cogau and Tyddyn Eos (5.2);</p> <p>(c) impacts upon the primary school and the one way system used;</p> <p>(d) working hours must be amended - noise disturbance at 7am (5.6 and 5.7);</p>	<p>Please see SP Manweb's response to FWQ 3.2 regarding the potential impact of construction traffic on the local community.</p> <p>Chapter 12 of the ES (DCO document reference 6.12) sets out in detail the traffic and transport impact assessment carried out for the Proposed Development. The assessment concludes that, with embedded and specific mitigation measures as outlined in the Construction Environmental Management Plan (CEMP, DCO document reference 6.18) and supported by the outline Traffic Management Plan (TMP, DCO document reference 6.18E) there will be no significant effects associated with the Proposed Development.</p> <p>Additional mitigation measures identified in the outline TMP include restrictions, signing, temporary traffic management measures and communications.</p> <p>Although primarily designed to minimise the effects of construction traffic on the highway network, these measures will also have a benefit on the local community by reducing HGV movements, using the appropriate size vehicle and reducing flows in the peak periods.</p> <p>The level of construction traffic associated with the Proposed Development is considered to be minor in nature.</p> <p>The outline TMP, which forms part of the outline CEMP, is secured via requirement 13 of the draft DCO. Requirement 13 of the DCO will ensure that the final TMP, which will form part of the final CEMP, is prepared and submitted for approval to the relevant planning</p>

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		<p>authority prior to any stage of the authorised development commencing</p> <p>With respect to construction hours, please refer to SP Manweb's response to FWQ 3.21 - 3.26.</p> <p>With respect to any part of the road network being unsuitable for construction traffic and impacts on the school, please refer to SP Manweb's response to FWQ 3.3 – 3.23.</p>
	<p><u>Public Rights of Way and Tourism</u></p> <p>Adverse impacts on the North Wales Pilgrim's Way (NWPW) (6.1 to 6.6)</p>	<p><u>North Wales Pilgrim's Way</u></p> <p>The proposed 132kV Overhead Line would cross the North Wales Pilgrim's Way at just one location near Croen Llwm Mawr. It would be clearly, but briefly, visible as it approached the North Pilgrim's Way from Berain and oversailed the path as it headed towards the Elwy Valley slopes. The 132kV Overhead Line would not be largely backclothed by rising landform and existing trees. The proposed 132kV Overhead Line would not be close to the Pilgrim's Way as it crossed the Cefn Meiriadog ridge south and east of Bryn Cefn, north east of Bont Newydd.</p> <p>Section 7.7 of the ES (DCO document reference 6.7) assesses the likely effects on the regionally promoted North Wales Pilgrim's Way. Sections 7.7.79, 7.7.117 – 7.7.119 and 7.7.125 of Section 7.7 assesses these specific effects.</p> <p>Where structures are located close to the North Wales Pilgrim's Way, new tree and hedgerow planting has been proposed to help offset any effects.</p> <p>Whilst, in time, this would compensate for some of the adverse visual effects, Section 7.10 of the ES (DCO document reference 6.7) acknowledges that it is not be possible to screen views of all structures and the residual effect on short sections of the trail is likely to remain locally moderate. However, it is important to note that this effect would be transient and localised.</p> <p>Chapter 11 of the ES 'Socio Economics and Tourism' (DCO Document Ref 6.11) has utilised information from a number of sources to define the baseline against which the assessment was undertaken.</p> <p>In developing this baseline a number of organisations were contacted and data sources were reviewed. This identified the Pilgrims Way as being regionally promoted. It is not one of the 15 officially designated long distance routes in England and Wales.</p> <p>Please also note that Conwy CBC in its Written Representation commented they did not consider the proposals were likely to have a significant effects on the area's tourism economy In addition Conwy CBC in its Local Impact Report at paragraph 6.6.2 confirms that "<i>[i]t is not envisaged that the proposed development would not be to the detriment of the [public rights of way] network as a whole or adversely affect any walkers or user groups.</i>" Similarly,. Denbighshire County Council in its Local Impact Report has confirmed at paragraph 13.5 that it considers "<i>the proposal would have Neutral impact on the highway and footway network...</i>"</p>
	<p><u>Consultation</u></p> <p>SP Manweb have not responded to e-mail requests to enter into a SoCG (6.1)</p>	<p>SP Manweb first contacted the Users Group in July 2015 to discuss a SoCG. A confirmation email was received the following week following which the draft SoCG was issued on 13 August 2015.</p> <p>At the time of the Deadline 1 submission SP Manweb confirmed that comments had been received from the Users Group on the draft SoCG on 26 August 2015. SP Manweb is in the process of considering these amendments. To assist the ExA a comparite SoCG was</p>

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		submitted as part of the SoCG Position Statement submission at Appendix I showing the changes between SP Manweb's draft SoCG (first draft) and the User Group's draft (second draft). SP Manweb will continue to work with the User Group to conclude completed SoCGs as soon as possible and by the end of the examination.
	<p><u>Health and Safety</u></p> <p>(a) Overhead cables and use of harvesters and machinery work - this could cause safety issues (7.2);</p> <p>(b) The Users Group wish for SP Manweb to provide free of charge Health and Safety statements and maps allowing farmers and contractors to work safely (7.3);</p> <p>(c) Who would be liable/what would happen if the connection was touched or damaged by machinery (7.4)</p>	<p>(a) In response to 7.2:</p> <p>NPS EN-5 provides at paragraph 2.10.15 that an applicant should consider the height, position, insulation and protection (electrical or mechanical as appropriate) measures, subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002 as amended (ESQC Regulations).</p> <p>The ESQC Regulations impose requirements regarding the installation and use of electrical networks and equipment owned or operated by distributors such as SP Manweb. For 132kV overhead lines, the minimum height above ground is required to be 6.7m. The ESQC Regulations also require any part of a 132kV overhead line which is not connected with earth to be supported or surrounded by insulation, insulated so that it is protected or adequately protected to prevent danger. The height, position, insulation and protection (electrical or mechanical) of the proposed design are described in Chapter 2, 'The 132kV Overhead Line', in the Design and Construction Report (DCO document reference 7.1). The dimensions described show compliance with the ESQC Regulations.</p> <p>Further, SP Manweb has to ensure that all overhead lines are designed and built to comply with all relevant health and safety legislation. In the UK the Health and Safety Executive (HSE) has the responsibility to advise on standards for protection of health and safety. SP Manweb has defined duties as a distribution network operator in order to protect members of the public from the dangers posed by electrical equipment such as the Proposed Development. SP Manweb must ensure that the development complies with general health and safety legislation, the Electricity at Work Regulations 1989 and the ESQC Regulations.</p> <p>Clearance distances from overhead lines are used to ensure staff, customers and the general public are kept away from live equipment. 132kV overhead lines are a minimum clearance from the ground of 6.7m. This is the case along the length of the Proposed Development.</p> <p>(b) In response to 7.3:</p> <p>SP Manweb offers free advice and guidance to all customers regarding safe working practices in proximity to its infrastructure via SP Energy Networks, the SP company that maintains and operates the distribution network. As well as providing guidance documents on SP Energy Networks website¹ in Welsh and English, SP Energy Networks is free to contact to discuss concerns or to identify electrical infrastructure on an affected parties land. SP Manweb will provide plans showing the location of any electrical infrastructure within its network. SP Energy Networks also provide free of charge electro-magnetic fields surveys for properties in proximity to electrical substations, underground cables and overhead lines.</p> <p>(c) In response to 7.4:</p> <p>The Health and Safety Executive also provide guidance for avoiding danger from overhead lines². The guidance note confirms that overhead line owners such as SP Manweb have a duty to minimise the risks from their lines, and when consulted, advise others on how to control the risks. Businesses and employees who work near to an overhead line must also</p>

¹ www.spenergynetworks.co.uk/

² HSE Guidance note GS6 (Fourth edition)

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	<p><u>Historic Environment</u> Impacts upon Berain</p>	<p>manage the risks. The Health and Safety at Work etc Act 1974 (HSW Act) places legal responsibilities on everyone concerned with work activities, including employers, the self-employed and employees.</p> <p>Please see the response prepared to CCBC's Ground A Objection in their written representations, which summarised the assessment of the impacts upon Berain and conclusions reached in relation to embedded and specific mitigation measures.</p>
<p>Simon Peter White</p>	<p>I write to you to record again my opposition to the proposed construction of overhead transmission lines from the wind farms at Clocaenog Forest to join the main grid at St Asaph</p> <p>My opposition is based on the drastic visual effect this will have on the countryside. Proximity to properties and the health issues.</p> <p>The route that has been chosen by S P Manweb is one that has the most visual effect by sky-lining in several places and passing through ancient woodlands where removal of trees will be necessary.</p> <p>This area like most of North Wales relies heavily on tourism and many tourists walk this area. For those people to be confronted with these poles every 100 mtrs I feel will have a negative effect on their enjoyment and therefore on our tourist industry.</p> <p>I feel we have not been given by SP Manweb the real on costs of undergrounding these cables as an alternative which would preserve the beauty of this area.</p> <p>I would respectfully ask that you consider my comments when reaching your decision.</p>	<p><u>Visual Effects</u></p> <p>SP Manweb's response to First Round Written Questions 1.4 explains how, in accordance with Overarching National Policy Statement (EN-1), careful routeing and choice of infrastructure has avoided or minimised potential effects of the 132kV Overhead Line on the landscape, views and visual amenity. Paragraph 16 of the Response to Relevant Representations also considers the landscape and visual impacts of the Proposed Development. Although some significant landscape residual effects are likely to arise, these are localised and have been assessed as moderate. No landscape residual effects are assessed as major for the Proposed Development alone or for combined cumulative effects.</p> <p>The secondary measures proposed, including hedgerow reinforcement and new hedgerow trees, would maintain and in time enhance a strong landscape framework which will help to visually absorb the line and lessen its landscape effects.</p> <p>Where visual effects have been judged to be significant, SP Manweb has developed a range of specific mitigation measures. These are summarised in Table 7.23 (DCO document reference 6.7), and presented in Figure 7.23 of the ES (DCO document reference 6.16). Additional detail is provided in Appendix 7.6 of the ES (DCO document reference 6.20).</p> <p>The fact that none of the effects was assessed as major is not unexpected. An overhead line would be visible in the landscape, but the double wood pole structure chosen is of an appropriate scale (similar in height to mature trees, and generally lying below the horizon formed by the tree canopy) and is constructed from a material which sits well within this (largely) well-treed landscape. Combined with the careful route which has been selected, this embedded mitigation would reduce the likely effects.</p> <p>Indeed, Denbighshire County Council in its written representation at paragraph 3.2.6 has confirmed that it accepts the approach taken to the development of the alternative route corridors and that it the selection of the preferred route is appropriate. SP Manweb also welcomes the Council's acknowledgement that SP Manweb amended the preferred route following consultation to pass further to the west of Henllan to address particular concerns</p> <p>The identification of some significant landscape and visual effects is not unusual and is acknowledged in NPS EN-1 (paragraphs 5.9.8 and 5.9.18). The introduction of some 215 (circa 13m high) structures into the rural landscape of North Wales will inevitably result in some significant landscape and visual effects. SP Manweb considers that the predicted effects of the Proposed Development are proportionate to the type of development proposed and to the type of landscape in which it is located.</p> <p>The Proposed Development also avoids skylining wherever possible in accordance with the Holford Rules (see Appendix 7.2 'The Holford Rules' (DCO Document Ref 6.20.2).</p>

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		<p>Paragraphs 16.11(ii) and (iii) of the Response to Relevant Representations (DCO Document Reference SPM NWWFC RR Document 1) considers the potential for brief skylining of the poles at specific locations. The route of the Proposed Development in these locations has been guided by the presence of residential receptors. Section 7 of the ES (DCO document reference 6,7) assesses the likely visual effects in these locations and SP Manweb concludes that the Proposed Development is acceptable.</p> <p>The Proposed Development also includes the avoidance of ancient woodland wherever possible. Section 6.7 of Chapter 6 'Ecology and Biodiversity' (DCO Document Ref 6.6) explains how most of the ancient woodland in the area is found in Local Wildlife Sites. In total some 1.10 hectares of ancient woodland in Local Wildlife Sites would be lost. Mitigation measures are presented in Section 6.8 of Chapter 6 of the ES. This includes the proposal to maintain the areas of ancient woodland lost as traditional coppiced woodland, which would benefit wildlife and help promote the continuity of a range of species on site. SP Manweb's response to FWQ 6.9 (DCO Document Reference SPM NWWFC ExA1) confirms the maximum amount of ancient woodland that could be affected by the Proposed Development.</p> <p>Paragraphs 10.4 and 10.7 of the Response to Relevant Representations also considers the effects on historic woodlands. SP Manweb notes that NRW, whose remit is to ensure that the environment and natural resources of Wales are sustainably maintained, has not objected to the Proposed Development and considers that the Proposed Development is unlikely to have significant adverse impacts on the components of the environment within its remit, which includes ecology.</p> <p><u>Health Impacts</u></p> <p>SP Manweb has carried out a full assessment of the potential effects related to Electric Magnetic Fields (EMF) in Chapter 14 of the ES that accompanies the DCO Application (DCO document reference 6.14). Public Health England has confirmed in its RR (numbered 62) that it is satisfied with the conclusions of the assessment.</p> <p>The design of the Proposed Development complies with Government exposure limits, but because of concerns raised by both the public and government agencies, SP Manweb assessed the predicted EMF levels to provide evidence that this would be the case.</p> <p>The assessment confirmed that the maximum EMFs produced by the proposed 132kV Overhead Line would be less than the relevant Government exposure limits.</p> <p>There is no minimum lateral distance from the 132kV Overhead Line required in order to achieve compliance. As such compliance is not dependent on the exact route of the Proposed Development, which means that if the 132kV Overhead Line were to move within the Limits of Deviation, no increases in the levels would occur and the effect would remain not significant.</p> <p>The Proposed Development has been demonstrated to comply with the current public exposure guidelines as detailed in NPS EN-5. If these requirements are met NPS EN-5 states that EMF '<i>effects are minimal</i>' (Simplified Route Map for dealing with EMFs, page 23).</p> <p>No mitigation is required as the Proposed Development complies with the current public exposure guidelines as detailed in NPS EN-5 which states that '<i>no further mitigation should be necessary</i>' (paragraph 2.10.15) where the requirements are met.</p> <p>SP Manweb refers to paragraph 12 of the Response to Relevant Representations for</p>

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		<p>further details of the assessment of EMFs on human and animal health.</p> <p><u>Impact on Tourism</u></p> <p>Chapter 11 of the ES 'Socio Economics and Tourism' has assessed the likely effects arising from the Proposed Development. The assessment concluded that the Proposed Development would not lead to any significant adverse socio-economic labour market effects or significant adverse effects on the overall tourism economy or tourism related receptors. Paragraph 20 of the Response to Relevant Representations also considers the impact of the Proposed Development on tourism.</p> <p><u>Undergrounding</u></p> <p>SP Manweb's response to FWQ 1.17 sets out the estimated costs for undergrounding the cables. These costs are also considered in paragraph 19.4 of the Response to Relevant Representations.</p> <p>The SP Manweb 2015 capital construction cost of undergrounding the 132kv cables is estimated to be between £1,150,000 and £1,640,000 per km depending on the difficulty of the ground conditions. Western Power Distribution, in its life time costs estimate for its Brechfa Forest project, estimated the capital costs for that project ranged per km from £950,000 to £1,003,000. This is a difference between the two projects of £200,000 – £637,000 per km (<u>such a difference being due to the particular ground conditions for each project and the extent of the changes in ground conditions throughout the route of each project</u>). The figures are therefore comparable.</p> <p>The SP Manweb 2015 capital construction cost of 132kV overhead double wood pole is estimated to be £345,000 per km. Therefore, the capital construction costs of undergrounding cables for the Proposed Development is between 4.7 and 6.7 times that of an overhead line.</p> <p>In the context of the requirements under the Electricity Act 1989 for SP Manweb to run an efficient, coordinated and economical system for the distribution of electricity, this is a significant ratio.</p>
Eifion Bibby	<p>Further to our previous communications, a series of emails with proposed amended scheme plans appertaining to our Landowner clients were received, on the afternoon on Friday 21st August 2015, in respect of Scottish Power [being we interpret the detail referred to in the letter from Pinsent Masons to the Planning Inspectorate on 24th July 2015 (as specified under the heading "Revisions to application documents" in the Rule 8 letter dated 4th August 2015)].</p> <p>We have endeavoured to forward the same forthwith to our client's for consideration (either by email where this facility is known to be available, or alternatively by first class post) .</p> <p>Furthermore we have been informed ,in respect of Scottish Power ,that an explanation on of the revisions made or otherwise, (pursuant to the interested parties' requests) is to follow- but this has not yet been received.</p>	<p>Points 1 and 2</p> <p>SP Manweb can confirm the plans sent to Mr Bibby on the 21st August 2015 are the same plans that SP Manweb submitted to the Secretary of State on 11 September 2015 in support of SP Manweb's request that the Secretary of State accept a refined line design incorporating those landowner suggestions (called "Option B").</p> <p>Undergrounding (point i)</p> <p>Please refer to SP Manweb's response above in relation to Meirick LI Davies' representations on undergrounding.</p> <p>In relation to Mr Bibby's concerns about impacts of the Proposed Development on agricultural land activity, SP Manweb acknowledges that there may be some temporary adverse impacts on the agricultural activities that may carried out on land as a result of the</p>

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	<p>In addition please note we have not yet received the revised plans in respect of our clients whom are Tenants.</p> <p>We would accordingly appreciate the Planning Inspectorate's due consideration and urgent directions ,please, on the following :</p> <ol style="list-style-type: none"> <li data-bbox="468 449 1537 974">1. We have explained previously the practical difficulties given the timescale for Deadline 1 (i.e. 12 noon on 1st September 2015). With such revisions only being received on Friday 21st August ,and the writer being away on annual leave from 27th August -2nd September (together with the writer's alternative commitments scheduled in the meanwhile) we request that the opportunity is extended for representations to be made for, or on behalf of our clients, by at least 1 week to 12 noon on 8th September 2015. Whilst we note and appreciate the previous invitation to make representations, on formerly submitted application detail ,we are concerned that our clients will be subjected to abortive time & costs should they be required to make representations on existing as well as revised submissions ;and respectfully consider it would be a waste of resources to provide representations on scheme proposals which are subject to potential alteration , particularly given that all the updated detail and associated explanations, is expected from the applicant ,we understand by ,at the latest ,Friday 28th August (prior to the bank holiday weekend). <li data-bbox="468 995 1537 1352">2. For the avoidance of any doubt (and to ensure there is no confusion as to what is being regarded as the submission forming part of the scheme application) ,we would be obliged to receive confirmation of whether the Planning Inspectorate have received updated detail from Scottish Power as from 21st August 2015, in respect of our clients (whom have been registered as interested parties) or whether the Planning Inspectorate are expecting the aforesaid detail to be received by 28th August (on the basis of our interpretation in item1 above) as amended application submissions . Naturally it is vital that any revised application detail to be considered by the Planning Inspectorate corresponds with that which has been submitted by the Applicant to our clients. <li data-bbox="468 1373 1537 1583">3. That we may reserve the right for (and on behalf of) each of our clients (as interested parties) to : i)make oral representations at the issue specific hearings and/or to speak at the compulsory acquisition hearing. ii) be in attendance to accompany at a site inspection in respect of their affected property (if required). <p>In the meanwhile the following preliminary representations are submitted in respect of each of our clients (whom are registered as interested parties):-</p> <ol style="list-style-type: none"> <li data-bbox="379 1709 1537 1883">i)The preference would be for electricity apparatus to be sited below (instead of above) ground in order to mitigate long term adverse effects on the use of agricultural land and enterprise [which if above ground would result in inconvenience (together with health and safety concerns) with farming operations (including the use of agricultural machinery) & loss of productivity (for instance in respect of forage and arable cropping 	<p>Proposed Development. As noted in SP Manweb's Response to Relevant Representations (DCO Document Reference SPM NWWFC RR Document 1), Section 20.4:</p> <p><i>"20.4.1... In order to minimise effects SP Manweb will work closely with landowners to carry out construction works in a way that will reduce the potential disruption. SP Manweb will also work closely with affected landowners to negotiate compensation terms if this is appropriate.</i></p> <p><i>20.4.2. The ES assesses the potential impact of the Proposed Development on Land Use and Agriculture (DCO document reference 6.10). The assessment acknowledges potential effects relating to loss of small areas of operational agricultural land.</i></p> <p><i>20.4.3 In general, overhead line construction does not cause extensive damage, crop loss or disturbance (compared, say, with a cross country gas pipeline). Any damage caused, will be properly reinstated and compensation will be paid for losses arising from the pre-construction and construction works, in accordance with the requirements of the compulsory acquisition compensation code. These effects of an overhead line are experienced on a day to day basis by farmers. Overhead electricity lines are commonly routed across farmland and are experienced by a large number of farmers in the UK."</i></p> <p>The extent of impact on agricultural land will be very limited in that a standard pole footprint where it would be neither practical nor possible to carry out agricultural operations would be a maximum of approximately 40m², or 0.004 hectares which is equivalent to 0.010 acres. This is based on a pole separation of 3 metres, pole diameter of 0.50metres, and a working area buffer of 2 metres. Such a minimal reduction in field working area should not adversely affect agricultural operations to any meaningful extent.</p> <p>SP Manweb confirms that it is continuing to engage with land owners and other interested parties (including Mr Bibby's clients) in relation to these matters.</p> <p>Impacts of Proposed Landscaping (point ii)</p> <p>Requirement 5 of the draft DCO provides that no stage of the Proposed Development may be carried out until a written landscaping scheme is approved by the relevant planning authority which is generally in accordance with the outline landscape management plan (which refers to the Landscaping Plans), Any consultation required of the highways department will be taken before submission and by the relevant planning authority during the approval process.</p> <p>It is confirmed that SP Manweb will maintain the landscape mitigation planting for the maintenance period required under the DCO. SP Manweb is seeking the necessary rights (through voluntary agreement or, if that is unsuccessful, through compulsory acquisition) to access land to enable it to carry out this maintenance.</p> <p>Rights of way and access to water (point iii)</p> <p>In respect of the Proposed Development's potential impacts on Mr Bibby's clients' rights to water supplies, SP Manweb refers to and adopts its response to FWQ 4.1:</p> <p><i>"1. SP Manweb recognises the importance of a clean water supply being available to livestock at all times.</i></p>

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	<p>as appropriate)].</p> <p>ii) It is considered significant that as part of any required planting proposals determined in respect of the scheme application that no trees will be planted in boundaries along public roadsides (appertaining to our clients properties) owing to concerns regarding the effects on highway safety (in particularly near existing field gateways) and also given the costs for future long term exposure to maintenance and insurance liability for such trees abutting the highway .</p> <p>It is our concern that the provisions in the existing compensation code will not duly protect our clients in this respect and therefore it is considered that the equitable solution would be to avoid such a requirement being necessary at the outset.</p> <p>iii) It is fundamental that no existing access facilities (including rights of way) are extinguished/ disadvantaged and that rights for water supplies are maintained (without harm).</p> <p>iv)As a precautionary measure until the position in respect of item 2 above is known, and accordingly clarified, the following supplemental representation is also made in respect of each of our clients:</p> <p>Whilst we are aware (subsequent to recent site meetings held in July 2015) that the Applicant is in the process of reviewing existing scheme plans (including ,in part, the type [e.g poles with our without stays) ,number ,location and frequency of apparatus proposed to be site to seek to mitigate the concerns in item 1 above)] it is contended that the current application detail submitted to the Planning Inspectorate does not illustrate unambiguously what rights are intended to exist in perpetuity (in effect “ permanently”) and what temporary rights will apply in consequence of the proposed scheme . This is necessary in order to give due consideration as</p> <p>to the enduring impact of the intended scheme on the interested parties (owner/occupiers) affected properties pursuant to compulsory powers and accordingly to illustrate to what extent the subject land will be sterilised [so as to ascertain whether the effects of such impediments are capable of being duly compensated (pursuant to the compensation code) to reflect the associated limitations; and on whether there will be a requirement imposed for extinguishment of the proposed rights if there is an end date determined for decommissioning of the wind farms –as raised in item 5.3 of the Examining Authority’s questions].</p>	<p>2. <i>In accordance with the outline Construction and Environmental Management Plan ("CEMP") (DCO Document Reference 6.18), SP Manweb will arrange pre-entry meetings with owners and occupiers of land or their agents to identify where field water supplies are and if they are likely to be disturbed or made inaccessible whilst the construction works are taking place. Discussions will also ensure that disruption to farming activities is kept, where possible, to a minimum. There will be liaison with farmers and / or their agents throughout. In this regard, the programme of works, in particular locations, will be mutually agreed where possible with landowners and tenants so that livestock can be relocated away from the actual work areas. During this period, if the livestock are unable to be grazed elsewhere whilst the works take place; replacement water sources would be made available through the provision of additional water piping and water troughs. The CEMP has been updated to reflect this commitment and an updated version of this document has been submitted for Deadline One. The outline CEMP also requires that where necessary working areas will be appropriately fenced off from animals.</i></p> <p>3. <i>If landowners have a right to use a water supply on neighbouring land (as identified within Part 3 of the Book of Reference, DCO Document Reference 4.3), SP Manweb has offered to those affected parties to source an alternative supply of water or relocate that supply, if there is any interference with this specific right to that apparatus as a result of the construction or operation of the Proposed Development."</i></p> <p>SP Manweb notes that it has contacted each of Mr Bibby's clients in order to negotiate measures that SP Manweb would agree to implement in order to ensure that potential impacts on these rights are minimised.</p> <p>In respect of the Proposed Development's potential impacts on Mr Bibby's clients' rights of way, SP Manweb is negotiating with Mr Bibby's clients to enter into an agreement which gives Mr Bibby's clients some protection in the very unlikely event that SP Manweb needs to temporarily interfere with these rights.</p> <p>Identification of rights sought and Decommissioning (Point iv)</p> <p>SP Manweb does not agree with Mr Bibby's position that the application documents do not include sufficient details of those rights that SP Manweb will be seeking to acquire:</p> <p>1. The Introduction to the Book of Reference (DCO Document Reference 4.3) clearly sets out the rights that are being acquired and the restrictions imposed. The Book of Reference then sets out plot by plot the Class of rights being acquired/imposed over each plot.</p>

Respondent	Written Representation	SP Manweb Response
	<p>We trust the Planning Inspectorate will be in a position to consider this submission to be fair and reasonable and to accept the preliminary representations made herein on behalf of each of our clients (formerly registered as interested parties) .Given the time limitation we would very much appreciate your earliest attention in this respect, including please on the extended timescale request.</p>	<p>2. The Statement of Reasons (DCO Document Reference 4.1) at paragraph 1.7 summaries these rights and restrictions as follows:</p> <ul style="list-style-type: none"> - Class 1 – rights for the installation, maintenance and use of the Proposed Development and the imposition of restrictions to protect the Proposed Development. - Class 2 – rights to use land as a temporary laydown area, construction working area, access for construction and for landscaping measures and the imposition of restrictions to enable the unimpeded construction of the Proposed Development. - Class 3 – rights for landscaping and the imposition of restrictions to protect the landscaping; and - Class 4 – rights for tree felling. <p>3. Section 7 of the Statement of Reasons then explains the purpose of these rights and restrictions, together with justification.</p> <p>4. Each of the classes of rights constitute permanent rights. Some rights will only be exercised for a temporary period, but the ability to exercise these rights will subsist permanently.</p> <p>5. The Land Plans, DCO Document Reference 2.2, identifies the plots referred to in the Book of Reference.</p> <p>In terms of a decommissioning requirement, SP Manweb's position is that a network asset such as the 132kV Overhead Line should not be tied to any one generating station. This, in SP Manweb's opinion, would conflict with its duties under section 6 of the Electricity Act 1989. However, SP Manweb would accept a requirement that required the decommissioning of the line should it not be used for a continuous period of 12 months. Please refer to SP Manweb's response top FWQ 5.2 and 12.23. The revised DCO submitted at Deadline 2 includes this requirement.</p>