Iwan W Jones , [redacted]

Comments on responses to the ExA's written questions –

Questions 1.17 -1.18b Response of SP Manweb and Sp Manweb's Respose to written representations.

The costing work done by SP evaluating the costs associated with undergrounding which they refer to in their answer to ExA questions are flawed and not a true reflection of actual costs within the industry and do not even match with their own reports.

The cost O & M is stated to be £10,643,478 over 25 yrs for the underground option. This equates to some £17,000 per km per annum. They say this is based on industry figures of 0.03faults per km per year and a cost of 600k per repair. Figures used by other companies in determining the cost of O & M is multiple times lower with Western Power (Feb 2014) in a report on undergrounding cable cost based on actual data t be £1000 per km per year versus an above ground cost of £800 per km per year. This is similar to other costs reported by other companies. In a benchmarking exercise done by WP consultants to review costs SP asset replacement cost associated with 132kv lines were in 2012 at a benchmark level of 29847 (benchmark being 100).

SP Manweb fail to state in their answer that over 50% of cables are in the region of 50yrs old and many are 70 yrs old and are more prone to damage/faults. In reports such as that by UK Power Networks Ltd in their Asset Stewardship Rep 2014 state that between 2007 and 2017 faults ranged between 0005 and 0.03 and that over 75% of these were due to the age and wear and tare of the cables. As this will be a new line with improved cabling then for the duration of this development be it 25 or 40yrs the fault rate will be neglible.

In their documents SP state that to repair a fault costs 600k on average based on their data. This is at odds with other companies which state that to repair joint breaks in 275/400kv is circa 200K. If repair cost are as high as SP state then their company reports do not mirror such expenditure. The other possible explanation for such a high figure is that they have based it on repairs done in urban areas of SP's area.
Based on WP and other companies figures the cost of O & M would be reduced to less than £1m over the 25 yr lifetime of the development.

Studies in other countries have found faults rate at rates of circa 8 faults per 100km over the lifetime of a development. These studies in Japan, France and Iceland were in countries which have far greater geological risks than ourselves.

Question 1.18(b)

SP state in their answer that undergrounding would require a route of 24km which would follow highways, this for two reasons –

-difficulties in land access – an assumption is made that landowners would not be as willing to grant access to maintain an underground line. Landowners have never been approached about their willingness and the vast majority would happily agree to grant

wayleve for a underground cable. This would have the potential to reduce the underground route by some 5km therefore saving a capital cost of circa £5m and reduced operational and maintenance costs.

- they state that highways tend to follow flatter land and that cables are more prone to problems with gradients and sharp turns – from the site visits it will be clear that the roads in the area suffer from sharp turns and that a direct route through fields in most instances would be better.

The combination of the inaccurate costing of operations and maintenance together with the longer route of undergrounding results in an unfair comparison of options and when taken into account the difference between overhead and undergrounding is substantially reduced to a level where the benefits in cost savings do not outweigh the cost to the landscape of this overhead development.

Question 4.7(C)

SP state ' the proposed development was directed towards land of the lowest grade, through careful routeing' – This is not the case and as will be seen on the site visit the route goes through some of the best agricultural land in North Wales that often sells for in excess of £15,000 acre.

4.7(d)
SP state 'most of the impact on farming operations likely to occur during construction'- There has been no assessment of the effect on health and safety of having pole in fields and no assessment of the effect tree planting will have on field production.

In the response to other peoples submissions SP state 20.3.14 that the proposed development would be comparable with telephone poles and wires in that they will be built on wooden poles. This is a wholly inadequate way of assessing the impact of the poles on visitors/tourist.

In their response SP have referred to issues with regards to where the development crosses the A543 near Groes. In their response they refer to the road as the A453 and pandy which shows the lack of genuine assessment made of the site which both Denbighshire and Conwy councils refer to as having and unacceptable effect on the landscape.

Both Councils in their replies to ExA's questions have stated that SP are refusing to give any guarantees for the future maintenance of any trees and hedges planted after 5yrs and that the cost of such maintenance and liability is likely to be borne by the landowners with no contribution by SP towards these costs. This is unacceptable as it could run up to thousands of pounds when trees are sited by highways.