

The North Wales Wind Farms Connection Project

SP Manweb's Response to Late Deadline 1
and Deadline 3 Representation from Eifion
Bibby relating to Requests for Relocation
of Poles

Application Reference: EN020014

Deadline 4 Submission

9th November 2015



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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Date	November 2015
Version	V1
Planning Inspectorate Reference No.	EN020014
Document reference	SPM NWWFC LD1&D3EB

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EN020014

RESPONSE TO:

1. **WRITTEN REPRESENTATIONS LODGED BY MR EIFION BIBBY (ON BEHALF OF THE CLIENTS LISTED IN THE TABLE BELOW) THAT RELATE TO POLE POSITIONS**
2. **POST-HEARING RESPONSES LODGED BY MR EIFION BIBBY (ON BEHALF OF THE CLIENTS LISTED IN THE TABLE BELOW) THAT RELATE TO POLE POSITIONS**

Respondent	Written Representation	SPM response
Written Representations Lodged by Mr Bibby After Deadline 1		
Eifion Bibby on behalf of Mr JE Davies	<p>This representation constitutes an annotated version of Plan Number: FGC-378105-LO570, being a plan dated 20 August 2015 prepared by SP Manweb entitled 'Draft Indicative Pole Positions within The Limit of Deviation Including Enhancement and Replacement Planting Details For Information Purposes'.</p>	<p>The annotated plan identified as FGC-378105-LO570 identifies the extent of Mr Davies' land holding and also includes details of the 132kV Overhead Line, Limits of Deviation (LoD) and enhancement and replacement planting.</p> <p>The plan is annotated to highlight the use of an existing track by Mr JE Davies along the northern side of the property boundary located at the southern side of angle pole 59. The representation indicates that the proposed location of pole 59 (in Option A) would interfere with the use of that track thereby obstructing access to fields to the west of the proposed route alignment.</p> <p>These suggestions were put to SP Manweb prior to submitting Option B.</p> <p>In Option B, SP Manweb has been able to reposition pole 59 and stays 7 meters north to accommodate this request.</p> <p>Mr Bibby and Mr Davies were notified of the changes adopted in the Option B design by letter on the 21/08/2015.</p> <p>No comment has yet been received from Mr Bibby or Mr Davies on SP Manweb's Option B OHL design proposals as they affect Mr Davies' land.</p>

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		<p>However, a meeting has been arranged with Mr Bibby to discuss this and terms of the voluntary Option and Easement agreements.</p>
<p>Eifion Bibby on behalf of Mr AEM Owen</p>	<p>Dear Sir,</p> <p>Further to our telephone conversation of earlier today, in respect of Scottish Power's Option A proposal, we confirm that our above mentioned client has asked that we request the Planning Inspectorate, please, to visit the subject affected land in his occupation as sitting tenant so as to be in a position to comprehend the request made for the following modifications to the scheme proposal.</p> <p>In order to reduce the significant impact of the proposed scheme on agricultural use of the subject silage/arable land, our client is seeking to adjust the siting of proposed Poles (stays) 193, slightly due north, closer to the hedge line, and even more significantly Poles (& stays) 196, due east, where approximately shown by 'X' on the accompanying Site Plan (with the poles and stays being as close as possible to the field boundary near the old quarry).</p> <p>...</p>	<p>These suggestions were put to SP Manweb prior to submitting Option B.</p> <p>SP Manweb has considered these suggestions but has not been able to incorporate them into the Option B design.</p> <p>Pole 193 is, in SP Manweb's opinion, in the most appropriate position. If the pole was to move to the north as suggested, this would introduce clearance infringements relating to overhead line clearances as contained within ENA Technical Specification 43-8 due to the ditch/ravine located between poles 193 and 194.</p> <p>If pole 196 was moved due east, this would increase span lengths beyond specification limitations and also the pole and stays would need to be located in a quarry. This would create ground clearance infringements due to the relatively lower ground level of the quarry. As a result, the line would be less than 6.7m above ground in places.</p> <p>SP Manweb's representative emailed Mr Bibby to advise that these suggestions could not be incorporated in to the design on the 26/08/2015.</p> <p>During the accompanied site visits by the</p>

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		<p>Inspectors on the 23/09/2015 SP Manweb's representatives discussed the above directly with Mr AEM Owen.</p> <p>SP Manweb will continue to seek voluntary agreement with Mr Owen in relation to his Part 1 interest in the land and is in negotiations with Mr Bibby in this regard.</p>
Eifion Bibby on behalf of Mr AA Owen	<p>Dear Sir,</p> <p>Further to our telephone conversation of earlier today , in respect of Scottish Power's Option A proposal, we confirm that our above mentioned client has asked that we request the Planning Inspectorate, please, to visit the subject affected land in his occupation as sitting tenant so as to be in a position to comprehend the request made for the following modifications to the scheme proposal.</p> <p>In order to reduce the significant impact of the proposed scheme on agricultural use of the subject agricultural land, our client is seeking the following adjustments to the siting of the proposed apparatus -:</p> <ol style="list-style-type: none"> 1. Proposed Poles 182, due north to the hedge (in the direction of Poles 183). 2. Proposed Poles 184, to the next boundary line 	<p>All suggestions included in this representation were put to SP Manweb prior to submitting Option B.</p> <p>A response to each of the numbered points are set out below:</p> <ol style="list-style-type: none"> 1. It has been possible to reposition Pole 182 north in the direction of pole 183 on to the field boundary. This change forms part of Option B. 2. Pole 184 can move north to the boundary. However, SP Manweb has not made this change in Option B as our survey data and aerial photography suggests that the new pole position suggested by Mr AA Owen would be located on an existing gateway. SP Manweb considers that placing the pole in the gateway would not be of benefit to Mr Owen and therefore SP Manweb is seeking further clarification from him or his agent in this regard. In any event, SP Manweb would be

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	<p>(in the direction of Poles 185)</p> <p>3. Proposed Poles & Stays 185 due north closer to the next boundary line (in the direction of Poles 186).</p> <p>4. Proposed Poles 186, due north to the boundary line (in the direction of Poles 187).</p> <p>5. Proposed Poles 187 to be excluded.</p> <p>...</p>	<p>able to adopt the suggestion in relation to both Option A and B as it is within the LoD. Once clarification is provided by either Mr Bibby or Mr Owen, SP Manweb will confirm the outcome of this. The details of the negotiations will be updated on to the Table of Negotiations.</p> <p>3. If pole 184 is moved north to the boundary following the suggestion contained within point (2) above, it would be possible to reposition pole 185 further north towards pole 186 by approximately 15m along the route alignment and within the Order Limits for Option A and Option B. The proposed change to 185 is linked to the on-going negotiations regarding the relocation of pole 184 in point 2). To be clear, the changes to Poles 184 and 185 can be accommodated within the LoD for both Option A and Option B.</p> <p>4. Due to the nature of the topography repositioning pole 186 to the boundary would introduce safety clearance issues. SP Manweb has therefore not adopted this change in either Option A or B.</p> <p>5. Pole 187 cannot be removed due to span length limitations. A span length of 136m would be required and the current design only allows for a maximum span length of 120m in this location.</p>
Eifion Bibby on behalf of Mr HM Parry	[This representation constitutes an annotated	The plan submitted as part of this representation

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	<p>version of Plan Number: FGC-378105-LO012, being a plan dated 20 August 2015 prepared by SP Manweb entitled 'Draft Indicative Pole Positions within The Limit of Deviation Including Enhancement and Replacement Planting Details For Information Purposes'.]</p>	<p>shows the proposed Option B alignment of poles 210 to pole 214 that has been taken into consideration following the feedback provided by Mr HM Parry on Option A</p> <p>Following consultation with Mr HM Parry and his agent, SP Manweb understands the Option B design is Mr Parry's preferred option should the DCO be granted. This is confirmed in writing in this representation.</p>
<p>Eifion Bibby on behalf of Messrs EW, PA and EW Hughes</p>	<p>Dear Sir,</p> <p>Further to our telephone conversation of earlier today , in respect of Scottish Power's Option A proposal, we confirm that our above mentioned client has asked that we request the Planning Inspectorate, please, to visit the subject affected land in their ownership so as to be in a position to comprehend the requests made for the following modifications to the scheme proposal -:</p> <p>A. In order to reduce the significant impact of the proposed scheme on agricultural use of the subject silage/arable land, our client is seeking:</p> <p>1. that proposed poles 112 can be located due west adjoining the 5m wide field access track ,but not obstructing the same and existing field gate (and abutting the northerly perimeter of the arable</p>	<p>These suggestions were put to SP Manweb prior to submitting Option B.</p> <p>A response to each of the numbered points are set out below.</p> <p>1. It has not been possible to accommodate the changes suggested for pole 112 due to restrictions on uplift and insulator bending forces. This structure is also a failure containment structure which must be located every 2kM along the route of the 132kV Overhead Line. SP Manweb has reviewed the design to see if it would be possible to remove the stays to create a standard H pole, however this is not possible due to safety factors.</p> <p>It is however possible to reposition the pole 7 metres closer to pole 113 if this reduces the impact on Mr Hughes' agricultural practices. SP</p>

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	<p>land)as approximately shown in green by “x” on appended Site Plan 1.</p> <p>2. that the existing field gateway as approximately shown in green by “ G” on attached Site Plan 2 will not be obstructed by proposed poles 117.</p>	<p>Manweb’s representative has notified Mr Bibby of the changes that may be possible and is currently awaiting a response on this matter. If Mr Hughes would prefer this option SP Manweb is able to incorporate the change in to either Option A or B as it is within the LoD.</p> <p>2. Should pole 117 interfere with the gate as identified by Mr Bibby at point 2, SP Manweb is happy to consider repositioning the gateway to a mutually convenient location as this would be within the LoD.</p> <p>The offer (at point 1 & 2) has been put in a without prejudice offer to Messrs Hughes and their agent for consideration. On the 23/10/2015, a further email was also sent to Mr Bibby confirming that SP Manweb was not able to move the poles any further in the direction of pole 113 due to technical constraints.</p>
Eifion Bibby on behalf of Mr M Jones	This representation constitutes an annotated version of Plan Number: FGC-378105-LO544, being a plan dated 17 March 2015 prepared by SP Manweb entitled 'Draft Indicative Pole Positions within The Limit of Deviation Including Enhancement and Replacement Planting Details'.	<p>This suggestion was put to SP Manweb prior to submitting Option B.</p> <p>Mr Jones made a request to have the proposed 132kV Overhead Line repositioned to the green line shown on the plan. SP Manweb considers that this change is not possible due to engineering reasons relating to the maximum angle of deviation allowable for this design of OHL. SP Manweb has, however, continued to review its</p>

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		<p>OHL design and on the 26/10/2015 provided Mr Bibby with a copy of a revised design that would potentially relocate one pole on to the hedgerow, all within the proposed Option A or B Order Limits.</p> <p>A meeting has been arranged with Mr Bibby to discuss the Option set out above and the terms of the voluntary Option and Easement agreements. The details of the negotiations will be updated on to the Table of Negotiations.</p>
Eifion Bibby on behalf of Mr DR & Mrs EM Owen	<p>Dear Sir,</p> <p>Further to our telephone conversation of earlier today, in respect of Scottish Power's Option A proposal (given that we understand Option B has not yet been submitted for consideration), we confirm that our above mentioned client has asked that we request the Planning Inspectorate, please, to visit the subject affected land in their ownership so as to be in a position to comprehend the requests made for the following modifications to the scheme proposal (in order to mitigate a lasting impact) :</p> <p>1. That proposed Poles 179 (together with stays) could be re-located within the neighbouring wooded parcel to the east (in the direction of Poles 178) to reduce the significant impact on productive</p>	<p>This suggestion was put to SP Manweb prior to submitting Option B.</p> <p>SP Manweb has considered this request and it has fed in to the Option B design proposal.</p> <p>Within Option B, pole 179 has been moved to the boundary of the adjacent property (east by approximately 22m).</p> <p>SP Manweb can not accommodate any further relocation of pole 179 within the Option B Order Limits due to technical constraints (relating to the span length between new pole position 179 and the existing pole position 178). This position also allows SP Manweb to incorporate another landowner suggestion on adjacent land parcels.</p>

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	<p>agricultural land (and interference with the roadside gateway to the parcel)...</p>	<p>SP Manweb's representative notified Mr Bibby of the above matters on the 21/08/2015 by e-mail.</p> <p>A meeting has been arranged with Mr Bibby to discuss the Option set out above and the terms of the voluntary Option and Easement agreements. The details of the negotiations will be updated on to the Table of Negotiations.</p>
<p>Eifion Bibby on behalf of Mr AA & Mrs CA Owen</p>	<p>Dear Sir,</p> <p>Further to our telephone conversation of earlier today, in respect of Scottish Power's Option A proposal, we confirm that our above mentioned client has asked that we request the Planning Inspectorate, please, to visit the subject affected land in their ownership, so as to be in a position to comprehend the request made for the following modifications to the scheme proposal.</p> <p>1. In order to reduce the significant impact of the proposed scheme on agricultural use of the subject forageable pasture land; AND also as this parcel was specifically purchased with the aim to seek planning consent to erect a rural enterprise dwelling on own land (abutting the farmstead of the adjoining Tenanted holding farmed also by Mr Owen) our client is seeking that the apparatus (Poles 175 -177) ,if not feasible to be undergrounded, are located as close to the public road boundary ,and with the least stays, as possible...</p>	<p>This suggestion was put to SP Manweb prior to submitting Option B.</p> <p>SP Manweb has incorporated this suggestion into Option B by moving pole 176 16m south towards the public highway.</p> <p>SP Manweb's representative notified Mr Bibby of the revised route alignment that was able to be incorporated in to the Option B design on 21/08/2015.</p> <p>A meeting has been arranged with Mr Bibby to discuss the Option set out above and the terms of the voluntary Option and Easement agreements. The details of the negotiations will be updated on to the Table of Negotiations.</p>

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<p>Eifion Bibby on behalf of Messers HW, EA & GW Hughes</p>	<p>Dear Sir,</p> <p>...</p> <p>A.</p> <p>i) In order to reduce the potential impact of the proposed scheme on agricultural use of the subject land [which consists, we understand, of heavy clay (as well as peat in part) and prone to being particularly wet ,especially ,in the winter, along significant sections of the intended route corridor] , our client is seeking that pole 119 is moved as far to the west of the adjacent field boundary fence as possible , as the current proposed position would dangerously impede on a narrow corridor available during, in particular, winter months for access via farm vehicles extending from the south to the north of the subject agricultural land .</p> <p>ii) a proposal for re-alignment between Poles 120-123 (inclusive) so as to reduce the number of stays required.</p> <p>iii) that the existing field gateway as approximately shown in green by “ G” on the attached map extract will not be obstructed by proposed poles 117?...</p>	<p>This suggestion was put to SP Manweb prior to submitting Option B.</p> <p>Responses to each numbered points are below</p> <p>i) SP Manweb has incorporated the change to the location of poles 119 into Option B.</p> <p>ii) SP Manweb is unable to re-align poles 120-123 within the Order Limits of Option B or Option A and the suggested location would place the poles further to the west. In SP Manweb's opinion, if these suggestions were adopted, they would be likely to impact on the Ancient and Semi Natural Woodland at Coed Wern Ddu.. In SP Manweb's opinion, if these suggestions were adopted, they would be likely to cause ecological effects on a woodland that is not currently impacted and, due to the woodland losses, significant visual and landscape impacts.</p> <p>In particular, the suggested changes would locate the poles closer to the woodland at Coed Wern Ddu The closer proximity of the wood pole structures and the overhead line to the woodland could necessitate tree felling/losses due to the requisite topple distances/clearances which would raise concerns from ecological and landscape and visual landscape and visual environmental perspective.</p>

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		<p>Additional tree losses from the Ancient and Semi Natural Woodland would be a direct effect on the habitat</p> <p>Removing the trees would also have landscape and visual effects. The overall significance of the landscape effect (Area 6: Limestone Plateau-Denbigh/Henllan) is at present minor, but depending on the extent of likely tree felling as a result of the suggestion and the resultant effects on parkland character in Eriviat Park, this could increase to moderate.</p> <p>iii) Should pole 117 interfere with the gate as identified by Mr Bibby, SP Manweb would consider repositioning the gateway to a mutually convenient location within the LoD. This offer has been put in a without prejudice offer to Messrs Hughes and their agent for consideration.</p> <p>A meeting has been arranged with Mr Bibby to discuss the Option set out above and the terms of the voluntary Option and Easement agreements. . The details of the negotiations will be updated on to the Table of Negotiations.</p>
Post Hearing Representations Lodged by Mr Bibby For Deadline 3		
Eifion Bibby (On behalf of HM Parry)	In order to reduce the impact of the proposed electricity apparatus in respect of Plas Hafod house amenity that the route section, including	Please refer to the response to the representation of HM Parry above.

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	Poles 212 & 213 can be moved, as far as possible, due east towards the field boundary	
Eifion Bibby (On behalf of D R Owen and EM Owen)	That proposed Poles 179 (together with stays) are re-located within the neighbouring wooded parcel to the east (in the direction of Poles 178) to reduce the significant impact on productive agricultural land (and interference with the roadside gateway to the parcel).	Please refer to the response to the representation of DR Owen and EM Owen outlined above (which is identical to this representation).
Eifion Bibby (On behalf of M Jones)	<p>Regarding proposed apparatus -:</p> <ol style="list-style-type: none"> 1. that the route of the poles can be realigned slightly to the east (resulting in proposed poles 124,127&128 being located in the vicinity of the field boundary). 2. that proposed poles 132 is relocated further north as close as possible to the hedge (towards poles 133) with proposed poles 131 remaining sited abutting the roadside field boundary. 3. that proposed poles 126 & 129 are removed. 	<p>These suggestions were put to SP Manweb prior to submitting Option B.</p> <ol style="list-style-type: none"> 1) SP Manweb has considered the realignment to the east of poles 124, 127 and 128. This change can not be accommodated due to engineering constraints relating to the maximum angle of deviation allowable for this design of the 132kV Overhead Line. 2) SP Manweb has considered the realignment of pole 132 and this change is not possible due to maximum span towards pole 131 only allowing a movement of 5m. Further, the proposed position would site stays in the ditch between pole 132 and the public highway. 3) SP Manweb is unable to remove poles 126 or 129 due to span lengths and topography, however SP Manweb has

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		<p>continued to review its OHL design and on the 26/10/2015 provided Mr Bibby with a copy of a revised design that would remove pole 128 and reposition pole 129 on to the hedgerow. These changes are not shown in Option B however that are possible within the proposed Option A or B Limit of Deviation.</p> <p>A meeting has been arranged with Mr Bibby to discuss the Option set out above and the terms of the voluntary Option and Easement agreements. The details of the negotiations will be updated on to the Table of Negotiations.</p>
Eifion Bibby (On behalf of JE Davies)	For poles 59 and stays to be sited 8 meters away from the neighbouring field boundary to the south (so that it does not impact on , and impede, the existing field track which is sited on a level plateau leading between adjoining parcels).This is very significant as the rest of the field is sloping and the existing track traverses in a strategic position (being the only suitable “ level” part within the parcel) .	<p>This suggestion was put to SP Manweb prior to submitting Option B.</p> <p>These suggestions have been accepted by SP Manweb and incorporated in to the Option B design. SP Manweb notified Mr Bibby of this in an email dated 21/08/2015.</p>
Eifion Bibby (On behalf of R Evans)	Whether pole 38 can be moved due south adjoining the field boundary with pole 39 moving more central within the same field & an additional H Pole	<p>These suggestions were put to SP Manweb prior to submitting Option B.</p> <p>These suggestions have been accepted by SP</p>

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	being located on the next boundary due north ,removing the need for stays to be attached to pole 40 (& leaving poles 41 & 42 in the same position).	<p>Manweb and are contained within the Option B proposal. Mr Bibby was notified on the 21/08/2015.</p> <p>A meeting has been arranged with Mr Bibby to discuss the Option set out above and the terms of the voluntary Option and Easement agreements.</p>
Eifion Bibby (On behalf of D C Jones) (as occupier)	<p>In order to reduce the potential impact of the proposed scheme on agricultural use of the subject silage/arable land ,that :</p> <ol style="list-style-type: none"> 1. Poles 88 are moved due east, 3 metres away to (but no closer to) the hedge (in the direction of Pole 87). 2. Poles 90 are relocated slightly due south to straddle the hedge-line. 	<p>These suggestions were put to SP Manweb prior to submitting Option B.</p> <p>Mr Bibby was notified of the acceptance of these changes on the 26/08/2015 and are contained within the Option B design.</p> <p>A meeting has been arranged with Mr Bibby to discuss the Option set out above and the terms of the voluntary Option and Easement agreements. The details of the negotiations will be updated on to the Table of Negotiations.</p>
Eifion Bibby (On behalf of A A Owen)	<p>In order to reduce the significant impact of the proposed scheme on agricultural use of the subject agricultural land ,the interested party is seeking the following adjustments to the siting of the proposed apparatus -:</p> <ol style="list-style-type: none"> 1. Proposed Poles 182, due north to the hedge (in the direction of Poles 183). 2. Proposed Poles 184, to the next boundary line (in the direction of Poles 185) 3. Proposed Poles & Stays 185 due north closer to 	<p>These suggestions were put to SP Manweb prior to submitting Option B.</p> <p>Please refer to the above response to AA Owen's representation, which covers the same matters as this representation.</p>

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	<p>the next boundary line (in the direction of Poles 186).</p> <p>4. Proposed Poles 186, due north to the boundary line (in the direction of Poles 187).</p> <p>5. Proposed Poles 187 to be excluded.</p>	
Eifion Bibby (On behalf of A E M Owen)	<p>In order to reduce the significant impact of the proposed scheme on agricultural use of the subject silage/arable land ,the interested party is seeking to adjust the siting of proposed Poles (stays)193, slightly due north, closer to the hedge line, as well as Poles (& stays)196, due east outside of the forageable land (as close as possible to the field boundary adjacent to the “old quarry”).</p>	<p>Please refer to the above response to AEM Owen's representation, which covers the same matters as this representation.</p>
Eifion Bibby (On behalf of EW Hughes, PA Hughes & E W Hughes)	<p>In order to reduce the significant impact of the proposed scheme on agricultural use of the subject silage/arable land , the interested party is seeking :</p> <p>1. that proposed poles 112 are located due west adjoining the 5m wide field access track ,but not obstructing the same and the existing field gate (and abutting the northerly perimeter of the arable land</p> <p>2. that the existing field gateway is not be obstructed by proposed poles 117.</p>	<p>Please refer to the above response to Messrs EW, PA and EW Hughes representation, which covers the same matters as this representation.</p>
Eifion Bibby (On behalf of HW Hughes, EA Hughes & GW Hughes)	<p>i) In order to reduce the potential impact of the proposed scheme on agricultural use of the subject land [which consists, it is understood, of heavy clay (as well as peat in part) and prone to being particularly wet ,especially ,in the</p>	<p>Please refer to the above response to Messrs HW Hughes, EA Hughes & GW Hughes' representation, which covers the same matters as this representation.</p>

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	<p>winter, along significant sections of the intended route corridor] , the interested party is seeking that poles 119 is moved as far to the west of the adjacent field boundary fence as possible , as the current proposed position would dangerously impede on a narrow corridor available during, in particular, winter months for access with farm vehicles extending from the south to the north of the subject agricultural land.</p> <p>ii) a proposal for re-alignment between Poles 120-123 (inclusive) so as to reduce the number of stays required to reduce impact on the use and productivity of the agricultural land.</p> <p>iii) that the existing field gateway will not be obstructed by proposed poles 117.</p>	