

**From:** [REDACTED]  
**To:** [North Wales Wind Farm Connection](#)  
**Subject:** 151113 EN020014 Iwan Jones - Comments on SP Manweb answer to AP 31 - Timing of surveys  
**Date:** 13 November 2015 12:18:51

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Dear Examiners

The applicant has supplied a timetable outlining the timing of survey work and license applications needed to achieve completion by the proposed deadline. These are not achievable for the following reasons -

- Guidelines state that only in exceptional cases can licenses be permitted prior to the approval of a DCO. Even in those exceptional cases it can only be done if the applicant has the written consent of the landowners.

- SP have submitted a draft license for Dormice - In the license it is required to provide the written consent of land owners and details how mitigation is to be maintained in the long term. SP's answer is that the landowners are aware of the scheme, this falls short of NRW requirement for written consent. This consent is only likely to be given following a voluntary agreement or the minister granting the DCO. The maintenance of mitigation measures are also yet to be agreed between the applicant, landowners, NRW and the local councils so it cannot be claimed that these are secured.

- One of the legal requirements of granting a license is that there is no other alternative. SP state there is an alternative in the 24km cable route through roads, which would have much less effect on protected wildlife, it just costs more.

- SP power to survey land will be granted by the DCO, up to now SP have been able to survey the route corridor under the 1989 Electricity act which gives the power to the license holder to survey land to see if it is suitable for the purposes of placing apparatus on it. As SP have stated in their application that the route is suitable for a 132 OHL line connection they now do no longer require the right to survey the land or it would suggest that they are still unclear of the suitability of the land for the development. The Ecology surveys they now propose to undertake are part of the 'Ecology Mitigation Programme' and part of the development itself for which they do not currently have the right to access land to survey. Basically they are jumping the gun and making the assumption that planning for the OHL will be granted.

For the above reasons and especially following national guideline SP cannot stick to its proposed timetable.

SP state that they have agreement with NRW on their approach but on contacting NRW they state that they have not agreed to the timetable on Dormice and other surveys/licenses.

Cofion  
Iwan Jones



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