

# The North Wales Wind Farms Connection Project

SP Manweb's Response to Post Hearing  
Submission from Interested Parties submit-  
ted at Deadline 4

Application Reference: EN020014

Deadline 6 Submission  
23<sup>rd</sup> November 2015



**The Planning Act 2008**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

**The North Wales Wind Farms Connection Project**

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EN020014

This table contains responses prepared by SP Manweb to specific points raised in the representations made by Interested Parties and submitted for Deadline 4. It does not respond to every single point made, rather it responds to material points that have not been explicitly dealt with through the Examination process or where SP Manweb felt that it would be helpful to further clarify the position for the Examining Authority.

No.	Respondent	Written Representation	SP Manweb Response
1	Peris G Jones	<p><b><u>Construction Programme</u></b></p> <p>Mr Jones considers there are discrepancies between the construction programme in the DCR and Appendix 3.12 of the Oral Summary of the Day 3 ISH.</p>	<p>As outlined in paragraph 5.3.1 of the Design &amp; Construction Report (Examination Library Reference APP-154), an indicative programme was included in Figure 5.1. This programme was an initial estimate of the timescales required to construct the project and was drafted taking account of a number of high level assumptions and also utilising experience gained on previous projects.</p> <p>The programme provided in Appendix 3.12 of the Oral Summary of the Day 3 Issue Specific Hearing (Examination Library Reference REP3-036) represents a further developed version, taking account of design development undertaken to date, and represents SPM's latest estimate of the time required to construct the project. It should be noted that this programme is also subject to change as design development continues.</p>
2	Peris G Jones	<p><b><u>Effects on residential property from Heulog and Bwlch</u></b></p> <p>The residential visual amenity assessment for Bwlch (including the holiday cottage) is challenged with reference to photographs. Mr Jones claims that there are little if any existing vegetation that would screen the current unspoilt views towards the proposed development, and that the views from Bwlch will be substantially affected.</p>	<p>Please see SPM's Comments on responses to ExA's first written questions (Examination Library Reference REP2-014). Within this document, at page 71-72 the 'Effect on Residential Property from Heulog and Bwlch' is summarised and explained in more detail.</p> <p>SP Manweb are still of the view that although the property at Bwlch would have views in the direction of the Proposed Development, it lies more than 200m from the Proposed Development and it is not considered that the Proposed Development would have an 'overbearing' effect on the visual amenity of the property with or without the screening effects of vegetation.</p>

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3	Robin Barlow	<p><b><u>Effects on residential property prices</u></b></p> <p>Mr Barlow provides a detailed breakdown explaining how he considers an OHL will devalue residential property prices near Cefn Meiriadog. He also explains that an underground cable would remove the impact of Plas Newydd. Reference is made to the Llandinam decision of the SoS.</p>	<p>The effect of the Proposed Development on property values was considered in SP Manweb's response to relevant representations (Examination library reference REP1-053).</p> <p>SP Manweb noted 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, if appropriate, 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 and would be a matter for negotiation between the parties, with reference to the Upper Tribunal of the Lands Chamber, where this is necessary. Compensation may be payable in respect of (among other things) decrease in market value of the land and disturbance loss.</p> <p>Notwithstanding the above, SP Manweb consider that the figures provided by Mr Barlow are inaccurate and without precedent. As such the Examining Authority should not place any weight upon them.</p> <p>Mr Barlow's comments on both property values and possible falls in value following completion of the Proposed Development are based on subjective opinions and are made with little or no evidence of true market value, tenure or use of properties in the area, nor any analysis of past, prevailing or future</p>

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			<p>trends both with and without the Proposed Development.</p> <p>The Rightmove property portal indicates that very few properties are available for sale or have changed hands in the recent past, within the area. It is noted that property prices in the area appear a lot less than quoted by Mr Barlow.</p> <p><b><u>The effect of the Proposed Development on the Bryn</u></b></p> <p>The effect of the Proposed Development on the Bryn and the old track from Plas Hafod to Trebanog has been considered previously. Please refer to SP Manweb Response to Relevant Representations Document (SPM NWWFC RR Document 1) (Examination Library APP REP1 - 053) submitted at Deadline 1.</p> <p><b><u>Plas Newydd</u></b></p> <p>Mr Barlow also refers to paragraphs 714 and 718 of the inspector's report in the Llandinam inquiry. The quotation refers to the particular circumstances of that case, where the effect on the heritage asset was considered by the inspector to be more significant than SP Manweb has assessed to be the case for Plas Newydd (or indeed any other heritage asset). The conclusions do not therefore apply to the effect of the Proposed Development on Plas Newydd.</p> <p>A part unearthed / earthed overhead line has not been considered appropriate due to the very high measured resistive ground at the substation. An earthed connection directly connecting the St Asaph earth system to the Clocaenog earth system is the most effective means to further reduce the anticipated Rise</p>

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			Of Earth Potential (ROEP) at the proposed Clocaenog substation site. Furthermore a remote earthing compound is not a design standard applicable to SP Manweb.
4	NRW	<p><b><u>Eriviat Hall – designated as Parkland</u></b></p> <p><u>NRW:</u> Eriviat Hall was designated under the TirGofal-agri-environmental scheme.</p> <p><u>Iwan Jones:</u> Under the ‘Tir Gofal’ scheme run by NRW predecessor CCW the land referred to as Eriviat Parkland through which the development runs was designated formally as parkland. Mr Hughes the owner of the land received at the ‘parkland’ payment rate for this land for the duration of his Tir Gofal scheme.</p>	<p>Tir Gofal was an agri-environmental scheme that encouraged farmers throughout Wales to maintain and enhance the agricultural landscape and its wildlife and to provide new opportunities for people to visit the countryside. It has been replaced by Glastir and Glastir Advanced (due to start in 2016) which is the sustainable land management scheme through which the Welsh Government offers financial support to farmers and land managers. The fact that Eriviat Hall was designated as parkland under this scheme does not change or alter the outcome of the Environmental Impact Assessment.</p> <p>To be clear, Tir Gofal and the CADW Register are two completely separate schemes.</p> <p>SP Manweb has previously confirmed (SP Manweb Written Summary of SP Manweb's Oral Case put at the Issue Specific Hearing Day 2 and Appendices; (Appendix 20) Application Reference: EN020014 Deadline 3 Submission Examination Library APP REP3-037) that Eriviat Hall and its surrounding land is not on the current list of Historic Landscape Areas, Scheduled (Ancient) Monuments and Listed Buildings for Wales. Denbighshire County Council has confirmed that they agree with this position.</p>
5	NRW	<p><b><u>Tree felling</u></b></p> <p>Details of the tree felling/management of Clocaenog are provided. The only felling that would take place on NRW</p>	SP Manweb is the process of finalising its voluntary agreement with NRW in respect of the necessary land rights at the southern end of the 132kv Overhead Line. Included in these discussions are the various rights needed in order to

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		<p>controlled land associated with the development, is at the southern end of the scheme, between indicative pole locations 1 and 7. Some felling will need to take place earlier than scheduled to allow for the construction of the line. This is as specified in the DCO. The intention in the location concerned would not be to replant because of the health and safety restrictions to forestry works adjacent to powerlines. NRW's Energy Delivery Team is currently in negotiation with SP Manweb over the exact area of this felling because a wider buffer area may be required for operational reasons. Any additional felling not covered by the DCO would be dealt with as an amendment to the Forest Resource Plan (FRP) for Clocaenog Forest.</p>	<p>carry out felling, as authorised in the DCO. No additional felling is required by SPM other than that identified in its Application.</p>
6	Dewi Parry	<p><b><u>Residential Amenity - College Farm</u></b></p> <p>“The proposed 132kV Overhead Line would briefly skyline as it reached the rising land adjacent to the B4501” whilst being a good description of the effect for someone moving on the B4501 road, it does not describe the effect for a residential receptor. The applicant maintains that it is still an accurate description for College Farm residential receptors (see Appendix 3, Action 6, para 5).</p> <p>Since this description within the visual assessment in the ES is actually for road users rather than stationary receptors/residents, it calls into question the basis upon which</p>	<p>As noted by Ms Sarah Gibson verbally at the Day 2 Issue Specific Hearing, the word ‘briefly’ suggests a temporal (time-related) quality to the statement which is not what was meant by the description. The following wording would therefore better represent the findings of the residential visual amenity assessment at College Farm bungalow: <i>“The proposed 132kV Overhead Line would skyline over a short section as it reached the rising land adjacent to the B4501.”</i></p>

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		residential visual assessment has been made for the whole route.	
7	Dewi Parry	<p><b><u>Residential Amenity - College Farm</u></b></p> <p>Mis-assessment of the primary views from the property, which require reappraisal. Mr Parry clarifies that 5 out of 7 seating positions in the lounge room are oriented towards the smaller south facing window and not towards the larger window. He also believes that the applicant should consider the south facing kitchen window in the kitchen to have a 'primary' view.</p> <p>We set out in our written submission for Deadline 1 (Sept 1) the direction of views from different rooms. Views to the south are from lounge and kitchen. Views to the south are from lounge and kitchen. Views to the west are from kitchen, dining room and bedroom. Primary views from the lounge are to the south as shown in the south view photo. 'Primary' being determined by the fact that 5 of the 7 seating positions in the lounge orient their external views to the south-facing (smaller) window rather than the larger west-facing window.</p>	<p>We acknowledge Mr Parry's detailed information in relation to the orientation of windows and views from his property, and appreciated the opportunity to view the location of the 132kV Overhead Line from within his property boundary during the Examining Authority's Accompanied Site Visit. As noted in Table 3.1 of Appendix 7.1: Residential Visual Amenity Assessment (Examination Library Reference APP-132), "Primary views towards the Proposed Development would be distant and oblique" and "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."</p> <p>SP Manweb can confirm that this property lies some 170 metres from the edge of the Limits of Deviation and as such has been considered in the Residential Visual Amenity Assessment. As noted previously, from this property, set in this location, with this orientation and at this distance, the wood pole structures would not block or obscure the panoramic views from the house or garden, and as such, the effects on residential visual amenity would be assessed as minor.</p> <p>SP Manweb acknowledges the additional information relating to the presence of some primary views from the bungalow, which Mr Parry notes are orientated both towards the Proposed Development, and orientated obliquely towards the Proposed Development. SP Manweb has previously noted (in SP Manweb: Applicant's Oral Summary to the Issue Specific Hearing held on 30 September</p>

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			2015, Examination Library Reference REP3-037) that the assessment of the significance of visual effects on their residential visual amenity would increase to the upper end of the minor to account for these primary views mentioned.
8	Dewi Parry	<p><b><u>Residential Amenity - College Farm</u></b></p> <p>Of the 20 structures that span the route from skyline to skyline (south to west) I estimate 12 of the structures would have negligible intervening vegetation which are marked as asterisk on Figures 1 and 2. In winter this would increase to at least 15 out of 20 pylons which means that 75% of the route would have no screening or backclothing from woodland in winter. I disagree with SP Manweb's conclusion, the pole structure and lines would severely affect and be detrimental to the panoramic views from the house and gardens.</p>	<p>We appreciate the effort Mr Parry has spent in the production of his submitted figures (1 and 2). Whilst we note that the photographs are not intended to be photo-realistic, (materials, finish, etc.) we cannot verify their precise accuracy (in terms of sizing, diminishing size as a result of perspective, their exact locations). Furthermore, they are not in accordance with GLVIA and could not be utilised as part of any assessment of the Proposed Development. As noted previously in the Residential Visual Amenity Assessment (DCO Document Ref 6.20.1), at this distance from the Proposed Development the overall significance of visual effects would remain as assessed, which was minor.</p>
9	Dewi Parry	<p><b><u>Residential Amenity - College Farm</u></b></p> <p>No reference by the applicant to the fact that two or more pylons would skyline to the south. The applicant's post-hearing response still does not describe the skylining poles on the ridge, the extent of the effect and how the residential visual assessment is impacted.</p>	<p>SP Manweb has made clear and referenced previously that "wood pole structures" (i.e. two or more wood poles structures) would skyline on the ridge to the south of the property, which is some 900 m from the property, and as such the assessment would remain as previously noted, which was minor. 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), "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."</p>

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10	Dewi Parry	<p><b><u>Residential Amenity - College Farm</u></b></p> <p>With reference to “This pole will be skylined in views to the west, with potential for adjacent poles to be partially skylined” This again is a significant understatement (see West View photo, Fig 2).: I find it hard to believe that the applicant is unaware that in addition to pole 69, the adjacent poles 70 and 71 will likely skyline fully, pole 68 will mostly skyline and pole 72 approx. 25%.</p> <p>The hedge will offer no appreciable screening.</p>	<p>We thank Mr Parry for his figures and whilst we cannot clarify their precise accuracy in terms of sizing, diminishing size as a result of perspective, variations in topography and the accuracy of the pole locations, we can clarify that as noted previously, at this distance from the Proposed Development, viewed from this location to the rear of the property, and at this orientation (oblique), the overall significance of effects on residential visual amenity remains as assessed, which is minor. As noted in SP Manweb's Responses to Written Representations Application Reference: EN020014 Deadline 2 Submission September 2015:</p> <p><i>“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 (Mr Parry) 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 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.”</i></p> <p>The Applicant maintains that the assessment has been undertaken within GLVIA3 guidelines and the prediction of 3-4 poles being visible is a reasonable</p>

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			judgement based on the available information.
11	Dewi Parry	<p><b><u>Residential Amenity - College Farm</u></b></p> <p>As Peniel village was assessed generally as moderate, College Farm, being the only property in Peniel within 200m of the line would expect to at least experience moderate effects. The Peniel 'moderate' evaluation was for transient receptors rather than residential receptors. Transient receptors' experience of the development would naturally be shortlived and have less lasting impact compared to residential receptors such as College Farm Bungalow.</p>	<p>As noted by Ms Sarah Gibson verbally at the Issue Specific Hearing on 30th September 2015, a moderate assessment associated with a nearby viewpoint does not indicate that moderate effects will be felt throughout the surrounding area. The moderate effects are likely to be felt in close proximity to the Proposed Development, with the significance of effects likely to gradually diminish with distance from the 132 kV Overhead Line,. Hence, at this distance, whilst the 132 kV Overhead Line will be visible from the bungalow, the effects on residential visual amenity are judged to be minor.</p> <p>Transient and stationary effects can be felt by a receptor, and these are noted in the assessment. Furthermore, the fact that one effect is transient and the other is stationary does not necessarily mean that there would be a lesser environmental impact on a receptor.</p> <p>We reiterate that within the Environment Statement the Residential Visual Amenity Assessment is carried out as a separate assessment to the Viewpoint Assessment.</p>
12	Dewi Parry	<p><b><u>Residential Amenity - College Farm</u></b></p> <p>Can the applicant also explain how they arrived at the general assessment of 'moderate' for Peniel.</p>	<p>A full description of the viewpoint assessment from the B4501 near Peniel can be cross referenced in Ref No 05 of Appendix 7.3: Assessment of Operational Effects Upon Selected Viewpoints, DCO Document Ref 6.20.3D (Examination Library Reference REP1-093).</p>
13	Dewi Parry	<p><b><u>Landscape and Visual Effects</u></b></p> <p>Unfortunately Appendix 6 of the report which comprises the mathematical formula is missing. It would be useful if this</p>	<p>Appendix 6 of the "Written Summary of SP Manweb's Oral Case put at the Issue Specific Hearing Day 2 and Appendices" (Examination Library Reference REP3-037) was only an executive summary of the full report, titled Guidance</p>

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		information could be made available.	on the Application of Separation Distances from Residential Properties (May 2014). The full document is provided as an Appendix to this response. This is not publicly available on the Council's website as it has not been translated into Welsh.
14	Iwan Jones	<p><b><u>Socio-economics</u></b></p> <p>List of those surveyed missing the majority of businesses that are closest to the development, all self catering outlets within 2km have been omitted together with the majority of pub, restaurants, cafes etc in the closest towns of Denbigh and Ruthin.</p>	<p>The content of this statement has been responded to on a number of occasions and in each instance it has been stated that SP Manweb does not accept the criticism of the tourism business survey coverage as it is factually incorrect. However, for clarification the coverage of the tourism business survey was as follows:</p> <ul style="list-style-type: none"> <li>• Inside the 2km catchment – 9 (60%) out of the 15 businesses (in total identified by PBA and Pylon the Pressure) in this catchment were identified and included within the PBA assessment;</li> <li>• In and around St Asaph – 4 (66.6%) out of the 6 businesses (in total identified by PBA and Pylon the Pressure) in this catchment were identified and included within the PBA assessment;</li> <li>• In and around Denbigh – 15 (83.3%) out of the 18 businesses (in total identified by PBA and Pylon the Pressure) in this catchment were identified and included within the PBA assessment; and</li> <li>• In and around Ruthin – 8 (68.6%) out of the 12 businesses (in total identified by PBA and Pylon the Pressure) in this catchment were identified and included within the PBA assessment.</li> </ul>

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15	Iwan Jones	<p><b><u>Socio-economics</u></b></p> <p>One of the biggest attractions in the area which is partly in the 2km zone, the Llyn Brenig reservoir has not been surveyed. Over 170,000 visitors enjoy its facilities annually.</p>	<p>The Llyn Brenig visitor centre was included in the socio economic assessment (with footnoted visitor statistics). It was fully assessed within Table 11.14 in Environmental Statement Chapter 11 (Examination Library Reference APP-12). No significant effects on the receptor are predicted as a result of the Proposed Development.</p> <p>Please note the Llyn Brenig visitor centre was also one of three receptors included in the assessment despite being outside the study area (to the south west). Identifying the location and potential impact was deemed necessary due to the attractions status and relative proximity.</p>
16	Iwan Jones	<p><b><u>Socio-economics</u></b></p> <p>In the hearing it was commented that one reply even mentioned the benefit to their business of need to accommodate construction workers, what was not mentioned that this comment was prompted by a leading question where the statement was presented to the person surveyed.</p> <p>Basically the surveyed is un-professional as respondents were suggested benefits of the scheme when asked for answers. No such 'suggestion/example' was given when asking for negative impacts of the development.</p>	<p>SP Manweb does not accept the point being made by Mr Jones in his representation.</p> <p>The survey business respondent who stated a 'high positive' impact to the first part of question 15 ('<i>What impact do you consider that the proposed overhead line would have on your business directly?</i>') and also the first part of question 18 ('<i>What impact do you consider that the proposed substation would have on your business directly?</i>'), clarified their response by stating in the second part of both questions that: '<i>we will provide accommodation to construction workers</i>'. This was stated before question 21 ('<i>Do you see any potential benefits to your business from the proposed overhead line and substation?</i>' e.g. provision of accommodation to construction workers) was asked and a reply given. The same business responded to each question by explaining that '<i>we will provide accommodation to construction workers</i>'. Hence question 21 is</p>

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			<p>only a validation of any response to questions 18 and 21 previously asked and responses are not on the basis of a 'leading question' asserted by Mr Jones. Equally negative impacts stated in response to questions 18 and 21 were further clarified by the respondents.</p>
17	Iwan Jones	<p><b><u>LVI/Historic Environment</u></b></p> <p>SP state that it is not registered with CADW however it should be noted that the register maintained by CADW is not statutory and is NOT a closed list - sites can be added or subtracted at any time. It could well be the case that there has never been an application. Some of the parkland designated as historic in the area are of similar age and display similar if not poorer features of historic parkland.</p>	<p>Cadw in partnership with the International Council on Monuments and Sites (ICOMOS UK), has undertaken a comprehensive survey of historic parks and gardens in Wales. Those thought to be of national importance are included on the <i>Register of Parks and Gardens of Special Historic Interest in Wales</i>. There are currently almost 400 sites on the Register, but is not a closed list.</p> <p>Cadw, in partnership with the Countryside Council for Wales (CCW) and the International Council on Monuments and Sites (ICOMOS UK), has compiled a <i>Register of Landscape of Historic Interest in Wales</i>. It identifies 58 landscapes of outstanding or special historic interest, which are considered to be the best examples of different types of historic landscapes in Wales.</p> <p>The Registers are advisory and the inclusion of a particular landscape, park or garden does not signify a statutory designation.</p> <p>Mr Jones refers to "parkland designated as historic", but it is unclear to what land he is referring and on what criteria he considers areas to be historic parkland or to display similar or poorer qualities to the land at Eriviat.</p> <p>The nearest registered historic park &amp; gardens are at Foxhall (RLPG C32), located around 1.35km to the northeast and at Gwaynynog (RLPG C58), located around 1.25km to the southeast of Eriviat. The nearest registered historic landscape is the Vale of Clwyd (HLA (C) 1), located over 2km to the</p>

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			<p>east of Eriviat. These sites are notably of higher overall quality than Eriviat, hence their registered status.</p> <p>The Planning Policy Framework in Wales advocates the use of LANDMAP as an information source for landscape assessment. LANDMAP is a pan-Wales GIS (Geographical Information System) -based landscape resource, comprising five spatially-related datasets, known as “Aspects”. The Aspects record information about the physical, ecological, visual and sensory, historic and cultural influences on the landscape.</p> <p>Chapter 7 of the Environmental Statement (Examination Library Reference APP-099) assessed those Aspects potentially affected by the Proposed Development as part of the LVIA. Berain is located within the Llanefydd Lowlands Visual Sensory Aspect Area, which benefits from localised parkland character and is judged to be of overall medium-high value.</p> <p>The application of all five aspects within a single assessment, as undertaken in Chapter 7, is in accordance with guidelines issued by Natural Resources Wales (NRW) which states that ‘it is the use of all five datasets of information that promotes sustainable landscape decision-making’.</p> <p>LANDMAP: Guidance Note 3 (NRW, May 2013) states clearly that LANDMAP is not intended for use in isolation by historic environment professionals (i.e. the Historic Landscape Aspect should not be interrogated in isolation).</p>

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			<p>Historic Landscape Characterisation provides a more detailed level of assessment for the historic environment than does LANDMAP. Historic Landscape Characterisation studies have been carried out for all of the areas included in the Register of Landscapes of Historic Interest in Wales and for some other areas. The area of Berain has not been the subject of Historic Landscape Characterisation.</p>
18	Iwan Jones	<p><b><u>Biodiversity and Historic Environment</u></b></p> <p>The development will mean the cutting down of the remaining trees referred to as THE FOUR SISTERS (see map of parkland). This group of trees are part of the areas heritage and are noted on historic maps. For some bizarre reason these trees were omitted from the survey made of the trees along the development. An amateur assessment would suggest that these remaining trees are of considerable age.</p>	<p>Eriviat Hall country house and parkland estate have been fully assessed in SP Manweb's historic environment chapter of the ES (Table 8.13 and Paragraphs 8.7.10, 8.7.69, Figures 5, 32). The estate, including the trees, was ascribed medium importance. The assessment noted that the east side of the estate was crossed by the Order Limits of the Proposed Development. Localised direct impacts were assessed as minor and not therefore significant. There is no historic environment reason for retaining the trees.</p> <p>The term "four sisters" to describe a group of trees in the vicinity of the Proposed Development is not documented or officially recorded; SP Manweb therefore assumes this is a locally known term to describe four specific trees. A number of scattered trees were identified as part of the Phase 1 Habitat Survey in the location indicated on Mr Jones' plan (see Figure 1.11 Examination Library Reference APP-131). At the time of the Arboricultural Survey access was not available for this part of the route and these trees were therefore not surveyed on the land. Although these trees would be lost as a result of the Proposed Development the EIA considered that overall the number of trees to be felled is considered to be small in a tree-dominated landscape.</p>

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19	Iwan Jones	<p><b><u>LVIA/Historic Environment</u></b></p> <p>OS map 108 (circa 1970) shows the Eriviat Parkland shaded in a colour which the index of the map identifies as parkland and gardens. (copy not supplied due to not having copyright).</p>	<p>Eriviat Hall is largely a nineteenth-century re-building of a modest late medieval farmhouse, albeit modified and enlarged in the early eighteenth-century.</p> <p>The earliest surviving, publically-accessible cartographic record of Eriviat is the Inclosure map of 1841, which shows the house and associated buildings surrounded by field enclosures, woodland and copses. None of the field enclosures are individually described in the Inclosure Award.</p> <p>Several OS County Series maps record parkland within the Eriviat Hall country house and parkland estate. These include:</p> <ul style="list-style-type: none"> <li>• OS County Series First Ed. 1880 (6" to one mile) records "Parkland" to the south and north of the hall (HER 79392, 79398)</li> <li>• OS County Series 1900 (1:10,560) records "Private Parkland" to the south of the hall;</li> <li>• OS County Series 1938-1953 (1:10,560) records "Private Parkland" to the east-northeast of the hall;</li> <li>• OS plan 1963-1964 (1:10,560) records "Private Parkland" to the east-northeast of the hall.</li> </ul> <p>Other maps which don't label parkland include:</p> <ul style="list-style-type: none"> <li>• OS county series 1874-1875 (1:2,500), 1879 (1:10,560), 1899 (1:2,500), 1912 (1:2,500), 1914 (1:10,560)</li> <li>• OS plan series 1967 (1:2,500), 1970-1995 (1:10,560) 1970 (1:10,000)</li> </ul> <p>The recording of "Private Parkland" on some of the OS County Series is not surprising and does not in itself convey status or significance above the medium value ascribed to the estate in the historic environment assessment (Chapter 8 of the ES – APP-099). The parkland estate does not benefit from statutory protection as a Registered Historic Landscape Area, Registered</p>

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			Historic Park & Garden or Scheduled (Ancient) Monument).
20	Iwan Jones	<p><b><u>LVIA/Historic Environment</u></b></p> <p>Eriviat was previously called Erifiad and was the site of a township 500- 700 years ago with many of the parkland features predating the house.</p>	<p>Eriviat Hall occupies the site of a modest late medieval farmhouse, which according to deeds originally dates to 1467.</p> <p>References to land in Erifiad can be found in various documentary sources:</p> <ul style="list-style-type: none"> <li>• <i>The History of the Princes, the Lords Marcher, and the Ancient Nobility</i> London: Forgotten Books. (Vols. III and IV: Original work published 1881 and 1884, respectively), Vol. III, p232, Vol. IV, pp. 124-5; The references are late 16<sup>th</sup> and early 17<sup>th</sup> century.</li> <li>• <i>Archaeologia Cambrensis</i>, W. Pickering 1876, p265</li> <li>• <i>Wales and the Welsh in the Middle Ages</i>, Essays presented to J.Beverley Smith. Edited by R.A Griffiths and P.R Scholfield. University of Wales Press, 2011). A fine rolls of 1322 records that Cynwig held land in Erifiad</li> </ul> <p>The first two of the above references refer to Tref Erifiad in the parish of Henllan which may indicate that Erifiad was recognised as a ‘settlement’, but it could equally mean a ‘home’, so does not necessarily convey more status than the farmhouse which is know to have existed at the site of Eriviat Hall.</p> <p>SP Manweb is unaware of any other documentary evidence that supports Erifiad as being the name of a medieval settlement. In any event, if one did exist, its original location is unknown.</p> <p>Standard approaches for mitigating potential impacts on non-designated sub-surface archaeology, such as may be discovered in the vicinity of Eriviat, are outlined in Paragraph 8.4.75 of the ES (Examination Library Reference APP-099), and are further considered in the Draft Construction Method Statement of the CEMP (Examination Library Reference REP4-012).</p>

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			<p>Mr Jones refers to “parkland features predating the house”, but he does not make clear whether he is referring to the original medieval farmhouse, the remodelled original or the present-day, post-medieval hall.</p> <p>In any event, it is likely that some of the present day landscape features do pre-date the hall and potentially also its medieval predecessor. This is not uncommon in a managed landscape of this type and would not in itself convey status or significance above the medium value ascribed to the estate in the historic environment assessment (Chapter 8 of the ES).</p>
21	Iwan Jones	<p><b><u>Compulsory Acquisition</u></b></p> <p><b><u>Action Point 1</u></b></p> <p>It is stated in paragraph 2.3 ‘it should be noted that where the Landscaping Plans show hedgerows with tree planting, these are hedgerows with trees already in them.’ This is not true as there are many examples of hedges where there are no trees presently.</p>	<p>Along the length of the Proposed Development there are hedgerows that contain trees of varying maturity and size, but this is not to say that every hedge along the 132kV Overhead Line route contains a mature tree.</p> <p>The Landscaping Plans have identified some hedgerows, where the addition of a small number (for example, two) of well-positioned trees within a hedgerow within the Order Limits would provide landscape and visual benefits due to localised screening of the 132 kV Overhead Line.</p>