

## North Wales Wind Farms Connection Project

**Deadline 10** January 21<sup>st</sup>, 2016  
**Interested Party Ref:** NWWFC-AFP012  
Mr Dewi Parry



Comments on post-hearing documents

### 1.0 Comments on:

**REP9-023** [SP Manweb - Written Summaries of Oral Evidence (CA Hearing 8th December 2015) Including Action Notes (Document Reference SPM NWWFC SCAH02)]

#### **Appendix 8 – Action Point 11**

The Applicant was asked to provide a written statement outlining how the different categorisations for Peniel and College Farm were allocated given that College Farm is closer to the proposed OHL.

- 1.1 As referenced in the above document; Ms Sarah Gibson verbally noted at the issue specific hearing on September 30<sup>th</sup> 2015 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 132kV overhead line.
- 1.2 The ‘people of Peniel’ as they go about their daily activities will only be in close proximity to the line if they are driving along the B4501 and then only very briefly, or if they take a public footpath along the base of the valley. The Applicant gives a “judgement of moderate for the wider visual amenity effects” even though I note that nobody in Peniel would experience the line closer than 200m distance or experience the sweep of the line as much as College Farm residents.
- 1.3 The Applicant’s assessment of ‘moderate’ for Peniel “refers to general visual amenity rather than effects on a specific view” yet they also emphasise the effect on people moving under the overhead lines as they travel along the B4501 and minor routes. There is only one instance in Peniel of the line crossing a public road (at Viewpoint 5).
- 1.4 For Viewpoint 5 the Applicant’s assessment of visual effect is “moderate and therefore significant”. The nearest property to Viewpoint 5 is College Farm and they share views of the route. The Applicant sets out their description of Viewpoint 5 in Appendix 7.3 (D): Assessment of Operational Effects upon Selected Viewpoints (Examination Library Reference REP1-093) which notes “The view is representative of both stationary views (e.g. from the edge of settlement or scattered residential receptors) and sequential views (roads, footpaths)”. The nearest ‘scattered residential receptor’ is College Farm.
- 1.5 It is logical to conclude that College Farm residents, being already high sensitivity receptors (unlike the road users) would therefore fall into at least a ‘moderate’ category.
- 1.6 In my view the Applicant has not offered justification for such a disparity in assessment between the transient receptors in and around Peniel and the residential receptors at College Farm.
- 1.7 I have made several previous representations on the inadequacy of the Applicant’s visual assessment of College Farm. My concerns remain.

## **General comment on visual assessment**

2.0 Briefly summarising key points of previous information submitted to the examination. The following are examples of the incorrect basis of the Applicant's residential assessment of College Farm:

Primary views - Applicant noted primary views not oriented towards the route and only oblique and distant views.  
- Actual primary views would be directly towards the route from 4 windows, across a wide span and including two skyline views.

Visible poles - Applicant notes "may experience winter views" (to the south)  
- Based on current information, actual view in winter will be up to 18 double-poles.

Skylining - Applicant noted only that route would 'briefly skyline'. Later predicted that up to 3 poles would skyline.  
- In fact 4-5 poles would skyline, based on examination of SPM plan/section drawings.

2.1 The Applicant noted that their assessment was revised to 'upper end of minor'. It is difficult for me to attribute any meaning to 'upper end of minor' as there is no possibility to evaluate. I have to assume no real change in assessment was made.

2.2 The above experiences coupled with doubts over the Peniel vs College Farm assessments give me little confidence in the Applicant's interpretation of the visual assessment methodology in this project.

## **Photographs**

3.0 The Applicant noted that my photographic depictions of the south and west views given in Deadline 4 submission are not in an acceptable GLVIA format and should not be admissible as part of the examination. I can however attest to the accuracy of the height of poles 69 and 65 in the photos due to comparison with adjacent structures of known height. Depiction of the other visible poles, especially the large skylined poles to the west does take into account the rising landform and distance.

3.1 The purpose of the photographs was to illustrate the greatly underestimated visual impact of these enormous structures and the severe intrusion into the landscape. I believe them to be as valid for reference as the Applicant's own photomontages, which after all had to be amended following complaints of inaccuracy in depicting structures in the landscape.

#### 4.0 **Comments on:**

**REP9-023** [SP Manweb - Written Summaries of Oral Evidence (CA Hearing 8th December 2015) Including Action Notes (Document Reference SPM NWWFC SCAH02)]

7.49 Item 5.1.9 In deadline 4, Mr Parry considered that the LVIA assessment of “briefly visible”, related to transient receptors and that stationary receptors like his dwelling at College Farm should have been given a higher weighting in the visual assessment process.

- 4.1 It’s of concern that the Applicant appears to have changed the definition of terms that are used in their visual impact assessments. As noted by the Applicant in the issue specific hearing on September 30<sup>th</sup> 2015 and detailed in my Deadline 4 submission, the term ‘Brief’ was initially defined by the Applicant as describing a temporal event in which a moving receptor experiences the visual effect briefly:

**REP3-037 - SP Manweb: Applicant's Oral Summary to the Issue Specific Hearing held on 30 September 2015 including supporting Appendices.**

“13.4 Ms Gibson indicated that the word “brief” has more consistently been used in relation to effects on views for road users or people who are moving through the landscape, and is meant to convey the effect that when driving along a lane one might have a brief glimpse of the line. Ms Gibson accepted that where the line goes over a ridge it is perhaps not the best description to say that it “briefly” skylines.”

- 4.2 The Applicant later noted that this was not the correct definition and was then redefined as describing a section of the line across the skyline.

**REP9-023 - SP Manweb's Written Summaries of Oral Evidence (IS Hearing 8<sup>th</sup> December 2015) Including Action Notes**

7.50 Ms Gibson explained that the reference to ‘briefly visible’ does not refer to transient receptors as explained in response to the Applicant’s Response to Dewi Parry in the Post Hearing, Submission from Interested Parties submitted at Deadline 4 (Examination Library Reference REP4-036). Ms Gibson stated that this was noted verbally at the Day 2 Issue Specific Hearing in October, 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: “The proposed 132kV Overhead Line would *skyline over a short section* as it reached the rising land adjacent to the B4501.”

- 4.3 I note that ‘briefly’ is also used in description of the line near Eriviat Hall and specifically Viewpoint 12:

**APP-159 7.5 Planning Statement Technical Appendices**

3.5.3 Section 7.7 of ES Chapter 7 Landscape and Visual concluded that none of the views and viewpoints and visual amenity from individual and groups of properties would be of a major level of effect. Overall for these receptors, Section 7.7 concluded there were, however, a number of **moderate** visual effects identified and referred to these as being in the following locations:

From clustered properties, local roads and footpaths close to the route as proposed 132kV Overhead Line crosses more open areas of landscape, areas where tree felling is required (north of Eriviat Bach Isaf and Hafod) and small localised undulations in the Llanefydd Lowlands. These are represented by the localised section of the B5428 near Eriviat Hall where the proposed 132kV Overhead Line Final Route Alignment briefly skylines (Viewpoint 12), and at Berain (Viewpoint 26) and therefore this is of moderate significance;

#### **Viewpoint 12**



I suggest that the Applicant’s definition of ‘briefly’ in terms of span length (as opposed to a temporal meaning) would not describe the wide span of skylined section in Viewpoint 12.

I also question whether it would quite describe the comparatively ‘non-brief’ approach by a road user.

- 4.4 I am concerned that the Applicant has sought to redefine terms as they become inconvenient to their case.

## Rerouting of Existing 11kV lines

- 5.0 The issue of the diversion of 11kV overhead lines in instances where they cross the proposed 132kV overhead route was raised at the issue specific hearing.

Section 10.18 of SP Manweb - Written Summaries of Oral Evidence (CA Hearing 8th December 2015) Including Action Notes (REP9-023) notes that *“It was confirmed by Mr Westmoreland Smith that diversions in relation to the existing 11kV lines are outside of the scope of the DCO. In response to a query raised by the Mr Dewi Parry, Mr Westmoreland Smith confirmed that Chapter 10 of the Environmental Statement assesses the impact of lower voltage overhead line diversions.”*

Whilst I am fully aware that the lower voltage diversions are outside the scope of the DCO I nevertheless wish to bring it to the Examiners’ attention once again. The concern is twofold:

- a) Since the December hearings took place the Applicant has contacted me to reaffirm their requirement to underground an existing 11kV overhead line as it crosses the proposed 132kV overhead line. An apparently unavoidable consequence of the diversion is that several additional stays would be installed that take up currently unaffected arable land. The planned 11kV diversion is inextricably linked with the proposed 132kV connection and is according to the Applicant absolutely required to be implemented. The net result in our case (and very likely others) is an even greater impact on landowners over and above the impact already identified for the 132kV installation. I am concerned that the Examiners may be unaware of the full effect of additional necessary works that form part of the project being examined.
- b) 6.17.4 ES Chapter 1 - Introduction Technical Appendix 1.4 (Examination Library APP-115) lists all the lower voltage diversions required. There are 15 in total. The entry relating to our case (shown below) specifies our “11kV line to remain in situ”. This description is clearly at odds with the wayleave agreements that SPM are seeking to underground the line and I appreciate that this may simply be an oversight in updating of documents. However it is also my understanding that this information forms part of SP Manweb’s application under examination by the Planning Inspectorate and that its accuracy is relevant.

6.17.4 ES Chapter 1 - Introduction Technical Appendix 1.4 (Examination Library APP-115)

Crossing Reference	Grid Reference	132kV OHL Spans	Description	Method	Approximate Duration of Works (days)
16 (Peniel)	303288, 363180	67 - 68	Proposed 132kV OHL crosses 11kV line between poles 60 and 61 of 11kV line	11kV line to remain in situ	n/a