

Cefn Meiriadog and Glascoed Road Residents and Users Group

Registration identification number 10031184

**NWWFC
EN020014**

Deadline 11: Responses to Deadline 10 comments and responses

The Group offers brief responses to some of the comments and responses made for Deadline 10.

1. From various developments and comments it has become clear that the vitally important issue of earthing has not been adequately considered or consulted upon by SP Manweb, and that their stance of unwillingness to consider any solution other than that of using heavy duty wooden poles (HDWP) is unjustified.
2. The issue is vital because the single most dominant concern, that of landscape and visually impact, is critically affected by it. The HDWP are particularly unsightly due to the large steel superstructure which they require and the consequent disproportionate visual impact they have on the surrounding landscape and countryside. While the Cefn Group and others would argue that undergrounding the entire route is the only acceptable mitigation for the landscape harm caused by the Connection, however it is carried if above ground, it is obvious that a solution using a single pole and a less unsightly superstructure, such as the Trident, is less damaging and thus preferable.
3. It would appear from RWE's decision to build their own substation and to earth locally to it that the assertion made by SP Manweb in relation to earthing is not tenable. This assertion is that due to the resistivity of the ground around the substation it has no option but to run an earth wire all the way to St Asaph. The necessity to do so is what in turn leads them to assert that only a HDWP solution is possible.
4. If it is accepted that earthing locally is possible, the necessity of using HDWP falls away and the possibility of using Trident poles instead is presented, which in turn removes the extreme impact on the landscape of the proposed connection as currently formulated.
5. The Group would argue therefore that the feasibility of this option must be exhaustively and independently evaluated. In connection with earthing it will be recalled that in submission for Deadline 5, the Group referred to the possibility, raised by the Inspector into the Llandinam development, of switching to Trident part way along the connection. This was at a time when SP Manweb's assertions about ground resistivity were taken on trust. The conclusion to be drawn is that the whole issue of earthing has not been dealt with by SP Manweb in a way designed to find the most acceptable solution to the issues and concerns involved.
6. The Group takes issue with the statements produced by SP Manweb in connection with Berain.
7. It notes the document "Heritage Assessment: Effects on Berain, Llanefydd, Conwy", prepared by Dr Jonathan Edis of the Heritage Collective and submitted by SP Manweb. Heritage Collective is closely linked to Landscape Collective, whose web site home page reads "Welcome to Landscape Collective, offering an invaluable range of landscape planning services to help our clients achieve their development aims and objectives from feasibility to implementation."

8. With SPM as the company's client, it is difficult to treat the report as independent rather than as a means of "help[ing] [SPM] achieve their development aims and objectives." In particular one questions the assessment of the impact on Berain being mitigated by the presence of farm sheds, however substantial they may be. Visually and conceptually, farm sheds are fundamentally horizontal structures. Pylons, on the other hand, are definitively vertical, and therefore are visually and conceptually in conflict with Berain even with the sheds. Additionally, the proposed connection affects Berain and its setting across a far greater distance of landscape.

9. The argument that the agricultural buildings associated with Berain detract from the impact on it of the proposed connection begs the question of what therefore is the situation with regard to Plas Newydd, which has no such buildings and is unchanged since built in 1583? In these circumstances it is not tenable to argue that a distance of 200 metres from Plas Newydd makes the impact negligible, as the distance of 200 metres appears to be an arbitrary one without any regulatory or statutory basis.

10. The Group would argue as it has done before that the only acceptable solution in terms of the visual and landscape impacts is for the connection to be undergrounded from or near the River Elwy to allow Plas Newydd and its setting to avoid being significantly harmed, and to avoid the 'skylining' over the limestone ridge nearby which is part and parcel of the landscape of which Plas Newydd is a most important part.

11. The Group notes the 30-year period referred to in the draft DCO and the discussion around this and the 'planning balance' in relation to Berain, etc. It draws attention again to the Secretary of State's statement in the Llandinam decision: *"409. SPM notes that the effect of the OHL would be reversible. It should be decommissioned and removed if no longer needed, and as its sole purpose would be to export electricity from wind farm development its life would also be limited to about 25 years [A6, 245]. However, 25 years is a long time and many people alive at the time of the OHL's erection would not live to see its removal."*

12. In practical terms, 30 years represents permanency for a large proportion of those living along the route and affected by it, in the sense that they will never live to see the landscape restored to the one they have lived with and engaged with as part of the fabric of their lives. It is salutary to reflect that 30 year prison sentences are virtually unheard of in today's society.

Martin Barlow
Chair
27.1.16