

# The North Wales Wind Farms Connection Project

SP Manweb's Response to CADW's Submission at  
DL10

Application Reference: EN020014

Deadline 11 Submission  
28<sup>th</sup> January 2016



**The Planning Act 2008**

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

**The North Wales Wind Farms Connection Project**

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BY EMAIL

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28<sup>th</sup> January 2016

Dear Sirs

## **PLANNING ACT 2008**

### **APPLICATION BY SP MANWEB FOR DEVELOPMENT CONSENT FOR THE NORTH WALES WIND FARMS CONNECTION**

SP Manweb notes the Welsh Government's Historic Environment Service (Cadw) has provided a response, which has been published on the PINS website on 22 January 2016. We make the following submissions below in response to each of the Examining Authority's Questions to Cadw:

We note in response to question one from the ExA, Cadw make clear that their response is desk-based only and they have not visited Berain or Eriviat Hall country house parkland estate ("Eriviat").

#### **Berain**

At Question 2, the ExA ask Cadw as follows: "*Please could Cadw provide a copy of their comments on the results and findings of the Applicant's heritage assessment that were used to inform their response to the ExA's first written question (9.1), with particular reference to Berain and Eriviat Hall*". Cadw clearly restate their previous comments which are attached to their recent letter and are set out under the heading 'Heritage/Historic Environment' in the Welsh Government Letter dated 25 June 2015. The particular paragraph referred to notes that any "*impacts are likely to be reduced due to the overhead line being only a low height timber wood pole construction rather than lattice towers*." Cadw reconfirms that they had no further comments to make having reviewed the draft Environmental Statement.

At Question 3, the ExA ask Cadw as follows: "*Please could Cadw confirm that they have assessed the effect of the proposal on the setting of the four listed buildings at Berain and if they haven't, would they still agree with the Applicant's heritage assessment and confirm that they have no particular concerns regarding the proposal with particular reference to the parkland to the south of Berain*". Cadw explain in the second paragraph of their letter that "*It is normally a matter for the local planning authority to provide an assessment concerned with the likely impact on listed buildings and conservation areas*." Cadw also confirm that they have no record of Eriviat south of Berain being considered for inclusion in the Register of Parks and Gardens.

Cadw concludes a harmful visual impact on setting by referencing only one viewpoint (presumably viewpoint 26), which forms part of the figures accompanying the Environmental Statement. That viewpoint is utilised for landscape and visual impact purposes and provides a view of Berain and the wider landscape, rather than specifically the listed buildings. Any desk based assessment that relies on this viewpoint alone would be entirely inadequate. Cadw's conclusions are that there will be harm to setting. No conclusions are then provided as to whether there will be any harm to significance and, as such, the assessment they provide is incomplete.

Cadw's "cause for concern" relies on the rarity and exceptional interest of the group of buildings and not any of the surrounding landscape. It is therefore unclear what Cadw's view is on the surrounding landscape relating to Berain.

In response, SP Manweb further emphasise that its assessment of the potential impact of the Proposed Development on the setting of Berain has been validated by two further papers prepared by David Bonner and Dr Jonathan Edis respectively. Both are highly experienced cultural heritage experts. They have both visited the site and independently reached conclusions as to the acceptability of the Proposed Development on the setting. They both conclude that the Proposed Development can be accommodated in that landscape.

### **Eriviat**

SP Manweb note that Cadw state as follows: *"An initial examination of historic maps and aerial photographs suggests that the parkland could be a potential candidate for addition to the register."* It is noted that Cadw has not expressed any views in relation to SP Manweb's assessment of Eriviat, merely citing that their own records are 'inconclusive' and that they 'could' decide to re-evaluate Eriviat.

SP Manweb consider that whilst Cadw's views are reasonable, it is a matter of fact that Eriviat is not currently registered and has at no time during the course of consultations on this Proposed Development been advised that this is a possible candidate site. If it were to be included, this would be subject to a consultation process. Cadw's comments on Eriviat should not be taken out of context. Cadw acknowledge that it has previously been considered and rejected and that a formal assessment would be required for any review of that previous decision.

Furthermore, SP Manweb's assessed effects of the Proposed Development on Eriviat are 'Minor'. As such, even if Cadw decide to re-evaluate Eriviat and determine to include it in the register, the assessed 'Minor' effects on a 'High' grade asset would still not be significant in EIA terms, in accordance with Table 8.6 of the ES Chapter 8 (Examination Library Reference APP-099).

### **Further matters for the Examining Authority to Note**

SP remains in dialogue with Cadw and has discussed their response dated 21<sup>st</sup> January 2016 directly. SP Manweb appreciates that their response follows the Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010 request from the Planning Inspectorate at Deadline 9 on 16<sup>th</sup> December 2015 for further information.

Finally, SP Manweb wish to point out to the Examining Authority that in the SOCG with Welsh Government, which includes comments on behalf of Cadw, also being submitted at Deadline 11, at paragraph 4.4 of that document both parties are agreed as to the conclusions made in relation to significance of effect.

SP Manweb would reiterate to the Examining Authority that it has provided sufficient information prepared by independent heritage experts, which has been available on the PINS website in relation to this project for interested parties to review and comment. No detailed response exists in response to these detailed submissions and would respectfully ask the Examining Authority to consider this when writing their recommendation.

*Yours faithfully*

A solid black rectangular box used to redact the signature of Steven Edwards.

*Steven Edwards*

*CC Helen May Cadw, Plas Carew, Unit 5/7 Cefn Coed*

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