

SP MANWEB



Reinforcement to the North Shropshire Electricity Distribution Network

Deadline 2 Submission

Application Reference: EN020021

**SP Manweb's Responses to the Shropshire Council
Local Impact Report**

SP MANWEB

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Distribution Network**

Response to Local Impact Report

**April 2019
PINS Reference EN020021**

QA Box

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1. INTRODUCTION

- 1.1. This document provides a response to the Local Impact Report (Rep1-010) produced by Shropshire Council submitted to PINS at Deadline 1.
- 1.2. SP Manweb notes that Shropshire Council do not raise any issues relating to the description of the Proposed Development (Section 2) and relevant Development Plan policies considered (Section 3). It is also noted that there are no other significant developments proposed or committed that need to be taken into account (Section 4).
- 1.3. Shropshire Council notes that specific issues are covered in Section 5 of the Report. The remainder of this section therefore focusses on comments made in Section 5 of the LIR.

SP Manweb Response

- 1.4. SP Manweb acknowledges the comments made by Shropshire Council (paras 5.2 – 5.7) with respect to heritage considerations.
- 1.5. SP Manweb acknowledges the comments made by Shropshire Council (paras 5.10 – 5.17) with respect to landscape and visual considerations.

2. ECOLOGY AND BIODIVERSITY

<p>Subject Matter</p> <p>Ecology and Biodiversity Considerations</p>
<p>5.21 The protection, restoration and enhancement of Shropshire’s biodiversity is considered to be of high importance. Shropshire Council has expressed some concern that although trees thought to be at risk from felling, partial felling or pruning works have been assessed for bat roost potential, climbing inspections/activity surveys have not yet been carried out on trees with moderate or high bat roost potential. Without these surveys, loss of important roosts and/or rarer bat species could occur without their favourable conservation status being considered at the decision-making stage, as required by ODPM</p>

Subject Matter
Ecology and Biodiversity Considerations
Circular 05/06 paragraph 99 and the '3 tests' under the Conservation of Habitats and Species Regulations 2017.
5.28 The Council has raised its concerns over the lack of bat roost surveys of trees identified to be felled or lopped. The applicant has informed us that these surveys will be carried out in the 2019 active season for bats, and that the results of the surveys should be available for consideration before a recommended decision is provided to the Secretary of State in September 2019.

SP Manweb Response

- 2.1. The findings of the preliminary bat roost assessments indicated that no likely significant adverse effects on bats are anticipated.
- 2.2. Preliminary bat roost assessments (PRA) (ground-based) of trees likely to be affected by works within 50m of the Order Limits and where trees may be affected by access tracks) have been carried out (see **DCO Document 6.7.2**, Ecology and Biodiversity Baseline and Assessment, Table A7.2.1). The survey area for activity surveys was selected to capture wider activity patterns across a representative variety of habitats in the vicinity of the Proposed Development. The ES identified that trees directly affected (felled or cut back) with medium or high bat roost potential would be subject to further survey to identify whether or not they support bat roosts, for example through climbing tree roost inspections.
- 2.3. Methodologies adopted for the surveys followed Bat Conservation Trust guidance, Collins J. 'Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition. (2016). All UK bats and their roosts are protected under the provisions of the Wildlife and Countryside Act 1981 (as amended) and the Habitat Regulations 2017 as European Protected Species (EPS).
- 2.4. All species recorded during baseline surveys are common and widespread species and overall activity was low.
- 2.5. Bat activity transects undertaken at representative locations along the Proposed Development did not suggest the presence of any roosts in close proximity to the Order Limits (as set out in Appendix 7.7 to the ES (**DCO Document 6.7.7**)). Effects on bat commuting and foraging habitats are

considered to be negligible, with minimal loss of suitable foraging habitat (primarily small areas of arable or grassland pasture) and negligible effects on bat commuting routes. Where short sections of hedgerow need to be lifted and replaced (generally same day operation), the small lengths involved (approximately 3-5m) would be easily crossed by bats and would not represent a barrier to flight lines or connectivity in the landscape.

- 2.6. Trees within 25m either side of the overhead line route (and hence having potential to be removed or cut back to facilitate works) were assessed for their potential to support bat roosts. The majority of trees affected are of negligible or low bat roost potential, and all trees identified as having low roost potential will be 'soft felled' by a qualified arborist as a precautionary measure. Some trees however have been identified as having moderate or high roost potential (see Appendix 7.7 (**DCO Document 6.7.7**)), requiring the possible presence of a roost to be confirmed before any works affecting them are undertaken.
- 2.7. The draft CEMP (**DCO Document 6.3.2 (APP-036)**), secured by Requirement 9 to the DCO, includes a 'Bat – Species Protection Plan' (Section 1.10) which sets out specific measures and responsibilities that will be adopted.
- 2.8. In response to the representation SP Manweb has adopted a precautionary approach and trees directly affected with medium or high bat roost potential will be subject to further survey, with findings reported before the end of the examination.

<p>Subject Matter</p> <p>Ecology and Biodiversity Considerations</p>
<p>5.22 A number of veteran trees have been identified for felling. Under the NPPF (paragraphs 11, including footnote 6 and paragraph 175c, including footnote 58) veteran or ancient trees are considered to be 'irreplaceable habitats' and normally permission should be refused unless there are exceptional circumstances.</p>

SP Manweb Response

- 2.9. In its response to the Relevant Representation made by the Woodland Trust (RR-014) submitted at Deadline 1¹ (REP1-002) SP Manweb noted (paras 14.16 – 14.18) that:
- 14.16 Government guidance states that Local Authorities should refuse planning permission that would result in the loss of ancient woodland or veteran trees except in exceptional circumstances. The Ministry of Housing, Communities and Local Government National Planning Policy Framework (July 2018), Habitats and Biodiversity, page 51, point 175 (c) notes that ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸...’ Footnote 58, notes ‘For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.’ Since this is a Nationally Significant Infrastructure Project, the circumstances are considered exceptional.*
- 14.17 Ancient woodland and veteran trees have biodiversity, cultural and heritage value, providing valuable habitats and contributing to the character of a landscape and placemaking, and SP Manweb’s aim has been to avoid them wherever practicable.*
- 14.18 The Proposed Development is 21.3km in length, and whilst SP Manweb have sought to avoid ancient and veteran trees, and areas of ancient woodland throughout the iterative design process, constraints relating to other aspects of the design, including technical feasibility and land use, have been taken into account when developing the scheme which is included in the application for a DCO.*
- 2.10. Routing for the Reinforcement to North Shropshire Electricity Distribution Network was informed by SP Manweb’s approach to routeing and the Holford Rules.
- 2.11. SP Manweb’s approach to routeing is based on the premise that the major effect of an overhead line is visual and that the degree of visual intrusion can be reduced by careful routeing. A reduction in visual intrusion can be achieved by routeing the line to fit the topography, by using topography and trees to provide screening and/or background, and by routeing the line at a distance

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020021/EN020021-000342-SP%20Manweb%20-%20Responses%20to%20Relevant%20Representations.pdf>

from settlements and roads. In addition, a well-routed line takes into account other environmental and technical considerations and will avoid, wherever possible, the most sensitive and valued natural and man-made features. Landowner considerations and economic considerations are important factors that also contribute to the approach to routeing.

- 2.12. Where feasible, routeing would always seek to avoid the felling of trees. However, in balancing all the considerations (environmental, technical, landowner requirements) all things considered, it is sometimes deemed necessary to carry out works to trees (felling or lopping) to accommodate the line.
- 2.13. Efforts were made to avoid groupings of trees, including small copses and small areas of woodland, such as those at Round Wood near the A5, Middleton Coppice, the trees on the hedgerow boundaries and a small section of woodland south of Babbinswood near the B5009 and Perrymoor Farm, the larger areas of woodland within Woodhouse Estate, the small woodland blocks in the landscape between Top House Farm and Kenwick Lodge, the hedgerows close to Stanwardine Hall, the well-treed pond near Coppice Farm, and the trees associated with the Local Wildlife Site at Moorfields. Re-routeing was also carried out at the River Roden to avoid impacts on a large mature oak tree and on the banks of the river. Where possible, crossings through grouping of trees and areas of woodland took the shortest route, e.g., as close as perpendicular to the canal bank as possible at the Montgomery Canal. Likewise, where the route crossed the hedgerow boundaries, a priority would be to route across sections of hedgerows that would require no tree felling. This would often involve taken points along a long section of the alignment, and adjusting the alignment to find the route which passed through the smallest number of trees.
- 2.14. The assessment identified 2 No mature² veteran trees to be felled, with 3 No further veteran trees with the potential to be felled (2 of these 3 veteran trees are mature veterans), i.e.:
- 2 mature veteran trees to be felled;
 - T32 near Pole 41; and
 - T131 near Pole 125;
 - 1 mature veteran and 1 veteran tree subject to FALARP (Felling As Low As Reasonably Practicable);

² A mature veteran tree refers to the 'life stage' i.e. a veteran tree of greater age.

- T63c mature veteran near pole 77 and Lower House/Dandyford Farm;
 - T70 veteran near pole 80 and Reynold's Cottage (both LCA7); and,
 - 1 mature veteran tree with the potential to be felled due to its proximity to pole 29;
 - T28 mature veteran (Pole 29).
- 2.15. SP Manweb considers the above demonstrates a particularly sensitive approach to line routing for this NSIP, in particular, in terms of minimising the effects on trees.
- 2.16. Second, the pre-application work included assessing various line route options and continuously balancing environmental considerations with stakeholder feedback, including that from affected landowners, and the technical requirements of the proposed design. Having finalised the line routing and assessments, SP Manweb then prepared the DCO application and identified Order Limits and 'Limits of Deviation' to provide confidence to stakeholders of the limits within which the line design might change.
- 2.17. Third, the extensive pre-application routing and stakeholder engagement has been carried out within a context of overall support expressed by the local planning authority as the project will help to deliver its planned economic and housing growth.
- 2.18. Fourth, in response to representations, SP Manweb has initially reviewed the potential for micro-siting within the Limits of Deviation to avoid / reduce effects on the 5 potentially affected veteran trees and has confirmed more accurately the potential effects on these trees:
- T32 – SP Manweb confirms that this tree is still to be felled, as any further micro-siting of the line to the north away from the tree would result in the felling of an adjacent mature oak (T35);
 - T131 –SP Manweb can confirm that this tree will be affected by the overhead line and will be subject to felling. Furthermore, the adjacent trees (although not veterans) T130 (oak), T132 (alder) will also be affected. If the line were to be micro-sited at this location, and the pole moved within 5m of its current position, an angle pole with a stay would be required to maintain the integrity of the line design and this would straddle the adjacent public footpath;

- T63c – SP Manweb can confirm this tree will still be affected. The proposed line in this location has been designed to take into account a number of landowners’ requirements;
- T70 —the potential for felling as low as reasonably practicable remains as stated. There is not enough tolerance / flexibility within the Order Limits and Limits of Deviation to remove the potential for felling;
- T28 – an initial review of SP Manweb’s topographic survey data shows T28 to be 15m from the proposed overhead line design (Pole 29). This indicates that the tree will be avoided, although some pruning may be required.

2.19. With the above considerations in mind, SP Manweb considers that taken together they demonstrate how SP Manweb has sought to avoid the trees and that their loss is unavoidable, and that the reasons set out above demonstrate the exceptional circumstances why this is the case for this project.

2.20. The Overarching National Policy Statement for Energy (EN-1)³ refers to generic impacts for biodiversity and geological consideration in section 5.3. With regard to ‘Ancient Woodland and Veteran Trees’ it states:

“Aged or ‘veteran’ trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided¹⁰⁴. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why” (Para 5.3.14)

2.21. Footnote 104 clarifies that:

‘This does not prevent the loss of such trees where the IPC is satisfied that their loss is unavoidable’.

<p>Subject Matter</p> <p>Ecology and Biodiversity Considerations</p>
<p>5.23 The ES states that c. 1.5ha of low biodiversity grassland and arable land, and 0.5ha of woodland will be lost through the development. SC appreciates that this a relatively low loss considering the extent of the development and is due to careful consideration of alternative routes.</p>

³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1_938-overarching-nps-for-energy-en1.pdf

Subject Matter**Ecology and Biodiversity Considerations**

However, in line with the NPPF the principle of biodiversity net gain should be followed and ensured via the proposed enhancement measures.

SP Manweb Response

- 2.22. SP Manweb noted in the Planning Statement (**DCO Document 7.1** (APP-086)) that, with regard to the National Planning Policy Framework(NPPF):
- The Framework does not contain specific policies for NSIPs as particular considerations apply to those projects, as these are determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant national policy statements for major infrastructure... (para 4.4.2)*
- 2.23. NPS EN-1 refers to the 'Protection of Habitats and Other Species':
- 'Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and thereby requiring conservation action.The IPC should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits (including need) of the development outweigh that harm'. (para 5.3.16).*
- 2.24. SP Manweb considers that as this is a Nationally Significant Project and will bring economic benefits to Shropshire (as identified in para 5.49 of the Local Impact Report), on balance the loss of relatively small areas of low diversity grassland and 0.5 h of woodland is outweighed by the wider benefits of the scheme.
- 2.25. SP Manweb's has identified opportunities for biodiversity gain in collaboration with Shropshire Wildlife Trust as identified in the 'Habitat Improvement Scheme' document. The measures contained in the Scheme include habitat creation and improvement works designed to benefit wildlife and specifically targeting threatened invertebrate species, otters and water vole.
- 2.26. Following the response from Shropshire Council above SP Manweb will be amending the Scheme to include provision for 0.5ha of new woodland planting. In addition to the Strategy, where landowners request planting SP Manweb will work with those landowners to provide reasonable areas of new woodland

planting. This planting will be by agreement and is not required or relied on as mitigation for the Proposed Development. Such planting accords with the objectives of the NPPF.

<p>Subject Matter</p> <p>Ecology and Biodiversity Considerations</p>
<p>5.24 Following careful choice of the routing, it is considered the proposed Development does not have direct impacts on international sites (SACs or SPAs or Ramsar Sites) and SC agrees with the applicant’s findings in DCO Document 6.7 in that there are no likely significant adverse impacts on such sites, either during construction or operation. Similarly, the Council considers that no likely significant effects from the Proposed Development have been identified on Sites of Special Scientific Interest.</p>
<p>5.25 The Council considers that the routing chosen from the various alternatives is the least damaging for biodiversity. No internationally, nationally or locally designated wildlife or geological sites will be directly impacted by the Proposed Development. The Council agrees with the findings of the NSER (DCO Doc 5.4) in that there will be no likely significant effects on Brownheath SSSI, part of the Meres and Mosses Ramsar Phase 2, or on any other international sites. Also, with appropriate pollution prevention measures in the CEMP, there should be no indirect effects on any of the above designated sites.</p>

SP Manweb Response

- 2.27. SP Manweb acknowledges the comments made by Shropshire Council with respect to designated sites and its agreement with the findings of the NSER (DCO Document 5.4 (APP-029)).

<p>Subject Matter</p> <p>Ecology and Biodiversity Considerations</p>
<p>5.26 The ES states that up to 5 veteran/ancient trees are to be lost to the Proposed Development, although the Arboricultural Report indicates higher numbers will be affected. It would be useful if this was clarified. Normally, damage to veteran trees would be contrary to paragraphs 11 and 175c of the NPPF as they are considered to be irreplaceable habitats. However, we note the footnote 58 to paragraph 176. Micro-</p>

<p>Subject Matter</p> <p>Ecology and Biodiversity Considerations</p>
<p>siting to avoid trees if they are found to support bat roosts is mentioned in the ES (1.4.72). Micro-siting to avoid loss of veteran trees should be revisited</p>

SP Manweb Response

- 2.28. As noted in the ES in Appendix 6.2 Landscape Baseline, Landscape Character Assessment (LCA) Sheets and Assessment ((**DCO Document 6.6.2** (APP-043)), section 1.5.2-1.5.3 ‘Direct Landscape Losses’), the assessment of likely direct landscape losses, including works to trees, is based on the Proposed Development presented in the Environmental Statement. In establishing the likely losses resulting from the Proposed Development presented in the ES, information has also been taken from the ADAS Tree Survey carried out for SP Manweb in April 2018, and from information (including the arboricultural survey) in Chapter 7 ‘Ecology and Biodiversity’ (**DCO Document 6.7** (APP-049)) and Chapter 8 ‘Historic Environment’ (**DCO Document 6.8** (APP-060)). Each of these surveys captures the design at a certain moment in time, and as such, a final review of likely tree losses is carried out by landscape and ecology specialists, using all available information, to best establish the likely losses resulting from the final alignment of the Proposed Development.

<p>Subject Matter</p> <p>Ecology and Biodiversity Considerations</p>
<p>5.30 Paragraph 7.8.7 of Chapter 7 of the ES states that a Habitat Improvement Strategy is being developed between SP Manweb and Shropshire Wildlife Trust to deliver biodiversity enhancements allied with the proposed development. Details of types and locations of habitats to be enhanced should be submitted as part of this document. Ideally it should provide compensation planting for trees 0.5ha, scrub and other habitats lost (1.5ha or a smaller area of higher biodiversity habitat) as well as enhancements providing biodiversity net gain and these should link to the Environmental Network in accordance with CS17 and MD12.</p>

SP Manweb Response

- 2.29. SP Manweb’s has identified opportunities for biodiversity gain in collaboration with Shropshire Wildlife Trust as identified in the ‘Habitat Improvement Scheme’ document. The measures contained in the Scheme include habitat creation and improvement works designed to benefit wildlife and specifically targeting threatened invertebrate species, otters and water vole.

- 2.30. As noted above following the response from Shropshire Council SP Manweb will be amending the Scheme to include provision for 0.5ha of new woodland planting. This planting is not required or relied on as mitigation for the Proposed Development. Such planting accords with the objectives of the NPPF.

3. NOISE AND AIR QUALITY CONSIDERATIONS

<p>Subject Matter</p> <p>Noise and Air Quality Considerations</p>
<p>5.32 Shropshire Council’s Environmental Protection Team confirm that they agree with the report content and do not consider any significant impacts on air quality are likely in respect of the construction phase and operational phase of the development. It is not considered necessary for any mitigating features to be included. However, it would be considered generally advisable for construction traffic to avoid driving through the town centre of Wem where there have in past years been concerns regarding air quality.</p>

SP Manweb Response

- 3.1. SP Manweb can confirm that, as identified in the ‘Traffic and Transport Technical Note’ (**DCO Document 6.1.1** (APP-032) and on the Construction Accesses Location Plan (REP1-005) construction traffic will not be routed through Wem.

Subject Matter**Noise and Air Quality Considerations**

5.33 it is common practice for temporary depots for equipment and material storage to be located close to the site. These depots would be used at the beginning and end of a working day as well as throughout when materials are required. These depots may be the source of noise for several months and those close by could be impacted for a more prolonged time than those close to the power line route who will only be exposed to noise when the construction is on the part of route closest to them. As a result, it is suggested that times of operation in any depots is limited to 07:00 – 19:00 Monday to Friday, 08:00 – 13:00 Saturdays with no use on Sundays and bank holidays. It is recommended that these times are adopted as the working day.

SP Manweb Response

3.2. Chapter 3 of the ES (**DCO Document 6.3** (APP-034)) states that:

'The construction compound for the Proposed Development would be located at the existing SP Manweb depot at Maesbury Road, Oswestry Industrial Estate, where site offices and welfare facilities are already in place. As this is an existing depot this compound is not included within the application'. (para 3.24).

And

'It is anticipated that the construction compound would be in place in the SP Manweb Maesbury Road Depot for a maximum of 18 months. .. the depot already serves as a maintenance and construction compound for other SP Manweb works'....(para 3.25).

3.3. Para 3.3.5 identified that

'Seven temporary lay-down areas, where poles and construction materials would be temporarily stored, have been identified at regular intervals along the route'.

3.4. Para 3.8.37 identifies that

'The works to construct the overhead line will take approximately 6 months to complete'

- 3.5. The use of the temporary laydown areas will therefore be for a maximum of 6 months (as is the case for the laydown area in proximity to Wem Substation).

- 3.6. The draft CEMP (**DCO Document 6.3.2** (APP-036)), which is secured by Requirement 9 to the draft DCO, includes the following with respect to working hours:
‘Construction activities would in general be undertaken during daylight hours only. For weekdays, this includes between the hours of 0700 to 1900 March to October and 0730 to 1730 or during daylight hours, whichever is the shorter, November to February. At weekends, the working hours would be 0700 to 1300 on Saturdays with no works on Sundays or bank/public holidays. Some works may be required outside of the working hours such as scaffolding/netting, highways crossings and completion of operations that cannot be safely stopped’. (para 1.6.47)

- 3.7. These hours are very similar to those proposed by Shropshire Council, with shorter working days (Monday – Friday) when daylight is shorter and only 1 hr longer on Saturdays. SP Manweb considers that the hours proposed are, on balance less than those suggested by Shropshire Council and therefore offer more protection to the public.

- 3.8. SP Manweb do not therefore propose to amend the working hours set out in the CEMP.

Subject Matter
Noise and Air Quality Considerations
<p>5.34 The noise assessment submitted has been considered in detail. The focus of the assessment is noise from a proposed substation extension off Ellesmere Road close to Wem. To the north west is a residential property. This property is set further back from the road than the proposed substation. The assessment has taken background noise levels from a location approximately 26m distance from the road where a modal average LA90(15min) of 36dB was recorded. The façade of the property to the northwest of the development is approximately 68m from the road. It is considered likely that the LA90(15min) at the residential façade in question may be less than 36dB.</p>
<p>5.35 The noise assessment has stated that it will procure plant and equipment that will produce a rating level of 40dB at the façade of the</p>

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Noise and Air Quality Considerations
residential properties. This rating level will be several decibels higher than the monitored background LA90(15min) when altered for additional distances.
5.36 At this noise level it is considered possible that the proposal is likely to have a detrimental impact on the property to the northwest in the day and potentially at night where it will be the dominant noise source. However, at night it is noted that the noise would be likely to create a rating level of 30dB inside the property. This level of noise is considered acceptable in relevant guidance. Although the application may increase noise, the absolute noise level inside the residential property at night is not considered likely to have a significant detrimental impact on the ability to sleep and is in line with World Health Organisation and British Standard guidance on this aspect.
5.37 When considering the potential impact on the residential property to the north west of the proposed substation in daytime hours it is noted that the applicant has stated that noise will be no more than 40dB at the residential façade. Although this is significantly more than the background noise level this noise level allows World Health Organisation and British Standards guidance in respect of acceptable noise levels to be adhered to and can accept this noise level as appropriate. It is recommended that this element is suitably conditioned by the appropriate authority.

SP Manweb Response

3.9. As set out in the 'Noise and Air Quality Technical Note' (DCO Document 6.4.1 (APP-038):

As the background sound levels are very low the assessment concluded that, in accordance with Section 11 of BS4142:2014, 'Methods for Rating and Assessing Industrial and Commercial Sound' it was appropriate to consider absolute noise levels as they affect the NSRs. The assessment then identifies a level of 40 dB LAr(T) (free-field) at the facades of the nearby residential properties which should not be exceeded. (para 1.3,5)

And

'SP Manweb intends to procure, from its specialist suppliers, a design of transformer, incorporating active control systems. It is intended that a rating

noise limit of 40 dB LAr15min will be applied, and therefore the levels of noise would fall within the requirements of BS 4142:214 when absolute levels are considered... (para 1.3.6)

- 3.10. SP Manweb can confirm it will be procuring a design of transformer incorporating active control systems with a noise limit of 40 dB LAr15min.
- 3.11. SP Manweb however acknowledges the comments made by Shropshire Council and has updated the draft CEMP (submitted at Deadline 2) to include monitoring should noise complaints be received, with associated noise attenuation to be agreed if required.

4. HIGHWAY CONSIDERATIONS

Subject Matter
<p>Highways Considerations</p> <p>5.42 The number and type of vehicles anticipated to be required for the construction of the works have been outlined within the submitted Transport and Highways Technical note. It is not considered that the movements likely to be generated will have a significant impact on the local highway network. However, due to Shropshire’s rural network, some proposed access routes, require vehicles associated with the construction to use sections of the network that are restricted in terms of available width, footway provision, and forward visibility. A proportion of access route will also require vehicles to travel through local settlements to include Primary Schools and other local amenities. Therefore, it is considered that the construction of the works needs to be carefully managed in accordance with the draft Construction Environmental Management Plan (CEMP) submitted, to include a Traffic Management Plan. Details of proposed vehicles and timing of delivery should be submitted for approval</p>

- 4.1. The ‘outline’ Traffic Management Plan (TMP) included within the CEMP (**DCO Document 6.3.2 APP-036**) states that:

‘This TMP shall be agreed with Highways England (HE) and Shropshire Council before construction works commence. It is a live document that will be updated and modified as agree with HE and Shropshire Council, as highways authorities, as the Proposed Development progresses and as detailed construction activities are clarified by the Contractor. (para 1.19.5)

- 4.2. Details of proposed vehicles and timing of deliveries will be included within the TMP (to avoid impacts on local communities and road users).

<p>Subject Matter Highways Considerations</p>
<p>5.43 The location of the access points are detailed on the revised plan It is proposed that existing agricultural accesses will be utilised and will be sufficient to accommodate vehicles associated with the works. The submitted Transport Plan indicates a small number of accesses may need to be widened. Any access directly on to Highway will need details of any alternations will need to be agreed with the Local Planning and Highway Authority prior to works commencing.</p>

SP Manweb Response

- 4.3. SP Manweb can confirm that no works will be undertaken to widen existing agricultural accesses. If required temporary traffic management (including the use of as banksman if appropriate) will be adopted.
- 4.4. Para 1.18.13 of the TMP in the draft CEMP (**DCO Document 6.3.2** (APP-036) has been amended to reflect this. The updated draft CEMP has been submitted at Deadline 2.

<p>Subject Matter Highways Considerations</p>
<p>5.44 Details of any proposed Traffic Management should be submitted for approval prior to undertaking works, as outlined within the submitted Transport Plan.</p>
<p>5.45 A Programme of works should be submitted and updated throughout the construction process to ensure that there is no conflict between other works taking place on the highway, road closures, or major events.</p>

SP Manweb Response

- 4.5. As noted above the TMP will be a live document and will be submitted to Shropshire Council for approval prior to works taking place.
- 4.6. SP Manweb has added a commitment in the updated TMP to the inclusion of a programme of works to ensure there is no conflict between other works taking place on the highway network nearby, road closures for major events.

Subject Matter
Highways Considerations
5.46 Shropshire Council as Highway agree that the levels of construction traffic would have no significant adverse impact on traffic using the local highway network and proposed use of construction traffic routes would not require works to the local public highway to make the development acceptable, this is reflected in the SOCG
5.47 Ongoing discussion regarding the contents of DCO are relevant, relating to the permissions to carry out any work on the Highway, which include alterations to accesses, erection of scaffolding, and the installing of LV cabling in the carriageway are all subject to additional permissions, that require the prior notification of works to the Highway or Street Authority whichever is relevant.

SP Manweb Response

- 4.7. SP Manweb notes Shropshire Council's agreement that levels of construction traffic would have no significant adverse impact on traffic using the local highway network.
- 4.8. Prior approval is embedded within the draft DCO (Article 37) and SP Manweb understood Shropshire Council to agree with the contents of this Article with their verbal response at Issue Specific Hearing 1 (20th March 2019).
- 4.9. At the request of Shropshire Council, informally at the ISH, SP Manweb are adding references to the appropriate sheet of the Access and Rights of Way Plans (**DCO Document 2.4.0 – 2.4.16** (APP-008)) to Schedule 3 of the draft DCO as requested by Shropshire Council.