

SP MANWEB



Reinforcement to the North Shropshire Electricity Distribution Network

Deadline 2 Submission

Application Reference: EN020021

**SP Manweb's Responses to the Examining Authority's
First Written Questions**



Application by SP Manweb for Reinforcement to the North Shropshire Electricity Distribution Network
The Examining Authority's written questions and requests for information (ExQ1)
Issued on 27 March 2019

The following table sets out the Examining Authority's (ExA's) written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Annex B to the Rule 6 letter of 20 February 2019. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue number and a question number. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team by emailing NorthShropshireReinforcement@planninginspectorate.gov.uk.

Responses are due by Deadline 2: Wednesday 24 April 2019



Abbreviations used:

PA2008	The Planning Act 2008	LVIA	Landscape and Visual Impact assessment
Art	Article	NE	Natural England
ALA 1981	Acquisition of Land Act 1981	NPS	National Policy Statement
BoR	Book of Reference	NSER	No Significant Effects Report
CA	Compulsory Acquisition	NSIP	Nationally Significant Infrastructure Project
CEMP	Construction and Environment Management Plan	NSRP	North Shropshire Reinforcement Project (the application, Reinforcement to the North Shropshire Electricity Distribution Network)
CLVIA	Cumulative Landscape and Visual Impact assessment	PEIR	Preliminary Environmental Information Report
CRT	Canal and River Trust	R	Requirement
dDCO	Draft DCO	RSPB	Royal Society for the Protection of Birds
EM	Explanatory Memorandum	SAC	Special Area of Conservation
ES	Environmental Statement	SC	Shropshire Council
ExA	Examining authority	SWT	Shropshire Wildlife Trust
FRA	Flood Risk Assessment	SI	Statutory Instrument
FRAP	Flood Risk Environment Permit	SoS	Secretary of State
HE	Highways England	TP	Temporary Possession
HRA	Habitats Regulations Assessment	WFD	Water Framework Directive
LIR	Local Impact Report	ZOI	Zone of Influence
LPA	Local planning authority		



The Examination Library

References in these questions set out in square brackets (eg [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the Inspectorate's webpage:

<https://infrastructure.planninginspectorate.gov.uk/projects/west-midlands/reinforcement-to-north-shropshire-electricity-distribution-network/?ipcsection=overview>

It will be updated as the examination progresses.

Citation of Questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number, eg ExQ1 1.0.1 – refers to question 1 in this table.



Index

1. General and Cross-topic Questions.....	5
2. Planning Policy.....	10
3. Air Quality and Emissions.....	10
4. Biodiversity, Ecology and Natural Environment... 	10
5. HRA Assessment	16
6. Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations	19
7. Draft Development Consent Order (DCO)	20
8. Historic Environment.....	25
9. Landscape and Visual	25
10. Noise and Vibration	34
11. Socio-economic Effects.....	36
12. Transportation and Traffic.....	37
13. Water Environment	37

ExQ1	Question to:	Question:
1. General and Cross-topic Questions		
Q1.0.1	The Applicant	<p>Examples of proposed Trident poles</p> <p>For which existing schemes has the range of proposed Trident poles been used in similar circumstances to the North Shropshire Reinforcement Project (Legacy to Oswestry in 2015 is mentioned for example in the Construction Report, APP-087)?</p>
		<p>The Trident pole design has been utilised by SP Manweb since the 1980s.</p> <p>Examples of Trident wood poles used in this project and used on similar SP Manweb schemes include:</p> <ul style="list-style-type: none"> • Carno Wind Farm I – Tee-In to Oswestry /Newtown 132kV Circuit (Approximately 15km, operational since 2002 across upland landscape in Mid Wales. • Lostock – Carrington 132kV reinforcement (Approximately 20km overhead line, operational since 2011, across predominantly arable / pasture land in North Cheshire and Trafford); • Legacy – Oswestry 132kV reinforcement (Approximately 20km overhead line, operational since 2015, across predominantly arable / pasture land in Wrexham and North Shropshire). <p>The Lostock – Carrington, and Legacy - Oswestry circuits are operating in terrain that is similar to that in North Shropshire.</p> <p>In all the above instances the selection of the Trident design to support 132kV overhead lines, with its use of wood pole supports and its small physical footprint (when compared to Heavy Duty Wood Pole and steel pylon overhead lines), allowed greater flexibility in design and minimised the potential landscape and visual impacts of the 132kV overhead lines.</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
Q1.0.2	The Applicant	<p>Examples of proposed Trident poles</p> <p>Are there any issues arising from the experience of these schemes now constructed which have informed the approach to the NSRP application?</p>
		<p>The Trident design was developed in the early 1980's by SP Manweb as a 'low profile' structure for supporting 132kV single circuits with less environmental effect. When the design was first introduced, SP Manweb prepared an article to explain the design principles (see Annex A in SP Manweb's Supporting Information). The technical design specification is ENA technical Specification 43-50 Issue 1984.</p> <p>(see http://www.ena-eng.org/ENA-Docs/Index?Action=ViewDetail&EID=89121&tab=search)</p> <p>As the SP Manweb article explains, the use of three 'fixed post' insulators means there is less conductor swing and as this reduces the spacing requirement between the conductors, they can be supported on a single pole. Conductors with greater swing need to be further apart and therefore supported by double pole structures. The article also explains that the single pole with an average height of 12m is less obtrusive in the landscape and more economic.</p> <p>The Trident design has proved to be resilient and reliable in terms of its technical requirements and operation, and has remained unchanged for almost 40 years.</p> <p>During the time that Trident has been used, SP Manweb has appreciated that the design has fewer landscape impacts due to the design being more easily backgrounded and screened by topography, trees and copses. The distance between supports requires fewer poles generally placed in hedges and at field boundaries rather than in the middle of fields and its installation requires less excavation and ground disturbance. This has meant the design has often been preferred by landowners as there are fewer obstacles to farming and land use.</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		<p>The use of the Trident design has also been favoured by stakeholders. For example, the Legacy – Oswestry overhead line reinforcement was initially designed as a different newer design, known as the Heavy Duty Wood Pole design, which is predominantly double poles and needed where there is a requirement for an earthing wire and a fibre optic for internal communications. This design was objected to by the affected local planning authorities, including Shropshire Council. When subsequent earthing studies indicated however that the earthing component was not required on the overhead line enabling the overhead line to be revised to the Trident design, this was immediately supported by stakeholders. This experience has also supported SP Manweb’s use of Trident design when technical parameters allow.</p> <p>It is with reference to the above experience that the approach to this scheme has been developed.</p>
Q1.0.3	The Applicant	<p>Land use</p> <p>What is the argument for 7 temporary laydown areas to facilitate construction compared with perhaps fewer used for a longer period of time?</p>
		<p>Proposing multiple temporary laydown areas provides flexibility during construction and reduces vehicle movements to and from the main construction compound at Maesbury Road and each construction access point.</p> <p>For the 132kV overhead line, poles would be delivered from the construction compound at Maesbury Road to each of the construction accesses using a hiab type vehicle (which can carry six poles per journey) and will then be placed in a stack of 10-12 poles. A JCB would transport poles from the stack to the pole installation locations. As the poles will arrive in bigger volumes on larger HGVs at the Maesbury Road depot, there could be more poles at the depot than there are at any one time at particular pole locations. To counter this, the temporary laydown areas also enable poles to be stored nearer the site to ensure there is an available supply of poles at any one time near to the construction areas. In addition, in the event that construction on a particular section is slower than expected, the</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p>poles will be transferred to the nearest temporary laydown area for overnight storage and avoid the need to transport poles back to the main compound. The temporary laydown areas also allow construction workers to park nearer the work site as well as storing securely other plant and equipment. SP Manweb consider this is an optimal approach to construction.</p> <p>Each temporary laydown area could also accommodate materials for the lower voltage diversions.</p> <p>To ensure a fairly even spread of laydown areas that also fits with the general accessibility and movement of construction traffic and could accommodate the required number of poles along particular sections, and to limit the temporary period for the use of the laydown areas for landowners benefit (they will be used for a short amount of time (8 weeks) SP Manweb identified seven of these temporary laydown sites along the 21km length of the 132kV overhead line.</p> <p>The combined use of the seven temporary laydown areas and construction accesses avoids the otherwise inefficient use of hiabs to transport poles from the Maesbury Road to site and back in the event they are not used during that part of the construction and therefore the number of journeys for the hiab vehicles using public roads to access individual pole locations via the construction accesses from the main depot.</p> <p>The use of the temporary laydown areas for overnight storage also supports SP Manweb's approach to utilise existing farm access tracks and so avoid the need to remove hedgerows for accessing pole locations when construction through hedgerows might appear to save time compared with travel to / from the main compound construction compound. In SP Manweb's view, the availability of seven temporary laydown areas provides efficiencies in construction time, minimises the use of the local road network to and from the main construction compound site and supports the construction access strategy of avoiding hedgerows.</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		The inclusion of the seven temporary laydown areas has also allowed the Order Limits to be narrowed to 25m as wider order limits along the route that would have been needed for safely storing poles and materials have not been required.
Q1.0.4	The Applicant	Interruptions to supply Is there any likelihood of interruptions to electricity supply locally during the construction works, and if so how will this be managed?
		<p>Interruptions to the electricity supply will occur during the 11kV lower voltage diversions listed in Table 6.1 of the Construction Report (DCO Document 7.2 (APP-087)).</p> <p>Interruptions are required for maintaining electrical safety whilst lower voltage lines are being permanently undergrounded or scaffolding is being erected or removed. Such disruptions to the lower voltage supply are not uncommon when works are required. SP Manweb always seeks to minimise such interruptions and are well used to managing the process and has a business standard in place. This standard requires that where there is a planned outage to 11kV supplies, the relevant SP Manweb District outage planner gives 28 days notice to SP Manweb's central operations control and they will confirm a date for the planned outage to enable written notice to be given to affected customers at least 14 days prior to the outage date.</p> <p>SP Manweb's own business process is well within the minimum Electricity (Standards of Performance) Regulations 2015 and SP Energy Networks' Guaranteed Standards of Performance leaflet:</p> <p>https://www.spenergynetworks.co.uk/userfiles/file/SPEN_Guaranteed_Standards_leaflet.pdf</p> <p>Regulation 12 'Notice of Planned Supply Interruption' states:</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		<p><i>'If we need to switch off your power to work on our network for planned maintenance work we will give you at least 2 days' notice. This is normally a letter delivered to the address held on our records. (We will always give as much notice of a planned interruption as possible, even if we know we've already failed the standard.)</i></p> <p><i>If we fail to give 2 days' notice or we switch your electricity off on a different day, then you can claim (within 1 month of the failure) £30 if you are a domestic consumer or £60 if you are a business consumer.</i></p> <p>For this scheme interruptions could last up to 7 hours (9am to 4pm) generally on one day and 28-day notice will initially be provided. For the lower voltage diversions the new sections of underground cable will be completed, the existing supply switched out the new circuit energised and the supply reinstated. The existing lower voltage overhead line will then be removed.</p>
2. Planning Policy		
Q2.0.1	SC	<p>Local Plan Review</p> <p>What is the current position with the Council's review of the Local Plan (Core Strategy and SAMDev) and are there any considerations for the safeguarding of sand and gravel resources potentially affected by the route of the overhead line between Cockshutt and Wem?</p>
3. Air Quality and Emissions		
		None at present.
4. Biodiversity, Ecology and Natural Environment		
Q4.0.1	NE	<p>Ecological effects</p> <p>Please state whether the measures contained in the draft CEMP [APP-036] are considered sufficient to avoid significant effects on the ecological receptors identified in the ES.</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
Q4.0.2	The Applicant, NE	<p>Protected species licences</p> <p>The draft CEMP [APP-036] makes several references to protected species licences that may be required post-consent, depending on the results of pre-construction surveys. Please confirm whether NE were consulted on this approach, and whether a 'Letter of No Impediment' from NE will be forthcoming.</p>
		<p>Natural England was asked for any comments or requirements regarding protected species during consultations. Natural England routinely responds to project proposals with reference to 'standing advice' on protected species and does not generally engage in specific consultations in this regard. Natural England's Scoping Response to the Planning Inspectorate (letter dated 5th April 2017) referred to the standing advice. (https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications#standing-advice-for-protected-species.)</p> <p>Chapter 7 of the Environmental Statement 'Ecology and Biodiversity' (DCO Document 6.7 (APP-049)) and its supporting appendices, provides details of the protected species surveys that have been undertaken:</p> <ul style="list-style-type: none"> • Ornithological Surveys (DCO Document 6.7.5 (APP-054)); • Amphibian Surveys (DCO Document 6.7.6 (APP-055)); • Bat Surveys (DCO Document 6.7.7 (APP-056)); • Otter and Water Vole Surveys (DCO Document 6.7.8 (APP-057)); • Badger Surveys (DCO Document 6.7.9 (APP-058)); <p>As stated in Chapter 7 of the Environmental Statement 'Ecology and Biodiversity' (DCO Document 6.7 (APP-049)), the potential for effects on protected species has been taken into consideration in the assessment process. Standing advice (see above) sets out required actions, and these have been followed. The Proposed Development has recognised that construction activities and the protection of species can be suitably addressed via either Reasonable Avoidance Measures/Method Statement or LICL or other</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p>licensing approach applicable to the species concerned at the time. A project-wide licence is also a possible approach.</p> <p>The current position regarding great crested newts <i>Triturus cristatus</i> is however undergoing change with the introduction of District Licensing across England (likely to be by 2020).</p> <p>Natural England has, for certain large-scale projects, provided a 'Letter of No Impediment' based on a draft European Protected Species licence application. This is not however necessarily a routine occurrence and would not always be required depending on the species concerned and likely degree of effect. The ES has identified those species for which a licence may (but not necessarily) be required in relation to proposed works at certain locations. These are</p> <ul style="list-style-type: none">a) great crested newtsb) bats andc) badgers. <p>As noted above, licensing for great crested newts is currently undergoing significant change across England, with Defra rolling out a new District Licensing process county-by-county. As a result, there is likely to be more than one possible route to achieving legislative compliance and ensuring the continued favourable conservation status of local populations of this species. This is acknowledged in the ES and the alternative approaches are summarised in Table 7.6 of Chapter 7 (DCO Document 6.7 (APP-049)). In line with Natural England's current policy guidance in relation to European Protected Species, a precautionary approach has been adopted – allowing either Reasonable Avoidance Measures, a Low Impact Class Licence, District Licence or conventional licence application route depending on current conditions at specific locations. This is both precautionary and reasonable in line with Natural England's standing advice and policies.</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		<p>No impediment to licencing is therefore anticipated. Licencing requirements cannot be finalised as, for certain species, survey work will need to be carried out shortly before commencement of works.</p> <p>Further bat roost assessments (including aerial or climbing surveys) to confirm the presence/absence of roost prior to any works likely to affect trees with identified moderate-high roost potential (in line with current BCT guidance). SP Manweb confirms that roost surveys will be carried out and information submitted prior to the Examining Authority prior to the close of the Examination.</p> <p>SP Manweb has, and continues to be in contact with Natural England. No concerns have been expressed.</p>
Q4.0.3	The Applicant	<p>Hedgerow reinstatement</p> <p>What is the likely success rate of reinstating hedgerows removed during construction works within 48 hours [APP-043, paragraph 1.3.4]?</p>
		<p>Hedgerow reinstatement (lift and replace) is a well-established and recognised approach, and for this project will involve only relatively short sections of hedgerow.</p> <p>The Hedgerow Management Plan (included within the updated Construction Environmental Management Plan (updated at Deadline 2 and previously DCO Document 6.3.2 (APP-036)) provides a methodology for hedgerow reinstatement.</p> <p>By adopting and following the methodology it can be stated with confidence that the approach will be successful. Examples of published information reflecting successful instances of approach this can be found at:</p> <ul style="list-style-type: none">• W S Atkins '<i>Translocation of Wildlife Habitats: A Guide for Civil Engineers</i>' : Case study of 100m hedgerow successfully translocated at Lightmoor Urban Village

ExQ1	Question to:	Question:
		<p>Telford and 240m of hedgerow at i54 Strategic Employment Site Wobaston Road Wolverhampton.</p> <ul style="list-style-type: none"> • Natural England NECR 132 (2013) <i>'Literature review and analysis of the effectiveness of mitigation measures to address environmental impacts of linear transport infrastructure on protected species and habitats'</i> • Devon County Council <i>'Devon Hedges and Development 1: moving hedges': A guidance note for developers, planners and landowners'</i>. • Woodland Trust (2013) <i>'Translocation and Ancient Woodland'</i> <p>The methodology includes contingency measures to include post-construction monitoring ensuring that, should there be individual plant failures, additional replacement planting will be undertaken to 'gap up' reinstated sections of hedgerow.</p>
Q4.0.4	The Applicant	<p>Invasive species</p> <p>What is the extent of invasive non-natural species along the route of the proposed development and how is it proposed they are controlled?</p>
		<p>As described in Chapter 7 'Ecology' of the Environmental Statement (DCO Document 6.7 (APP-049)), a very low incidence of invasive species was observed during surveys along the route of the Proposed Development, present only in isolated locations. Recorded invasive species are shown on Figure 7.2 (DCO Document 6.14 (APP-082)) and described within target notes from the ecological baseline.</p> <p>Following comments received from the Environment Agency (letter dated 25.03.19) the Construction Environmental Management Plan (CEMP) (DCO Document 6.3.2 (APP-36)) has been updated to include reference to biosecurity measures for non-native invasive species. Sections 1.6.32 – 1.6.34 details actions that should be undertaken to ensure no spread of invasive plant species and invasive aquatic invertebrates. The actions include guidance from the GB non-native species secretariat for works in proximity to water (clean, check, dry).</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		The updated CEMP has been submitted at Deadline 2.
Q4.0.5	The Applicant	Trees Several trees, including a small number of veteran trees, are proposed to be felled along the route of the overhead line alignment. Please explain how avoiding the need to fell trees was considered in the various routeing scenarios for the location of the poles.
		<p>Routeing for the Reinforcement to North Shropshire Electricity Distribution Network was informed by SP Manweb's approach to routeing and the Holford Rules.</p> <p>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 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.</p> <p>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.</p> <p>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</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		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 taking points along a long section of the alignment, and adjusting the alignment to find the route which passed through or close to the smallest number of trees.
5. HRA Assessment		
Q5.0.1	The Applicant	NSER Please provide Word versions of the two screening matrices that are contained in Appendix 1 of the NSER [APP-029].
		Word versions have been provided separately.
Q5.0.2	The Applicant	NSER The NSER [APP-029] does not appear to confirm that the worst case has been assessed. Please confirm the basis of the HRA assessment.
		<p>The European Court of Justice ruling (Case C323/17 also known as the 'People over Wind' ruling) on Habitats Regulations Assessments specifically excludes consideration of any mitigation measures within a Stage 1: Screening Assessment. As a result of this ruling, Competent Authorities cannot take account of mitigation that relates to European sites or their qualifying interest features at the Stage 1 screening stage when considering whether a plan or project is likely to have a significant effect (LSE).</p> <p>The Stage 1 screening assessment which is presented in the NSER has had regard to the 'People over Wind' ruling and is based solely on the project (the Proposed Development)</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p>as proposed, in the absence of mitigation, i.e. considering only the unmitigated effects of the route, undergrounded sections and the supporting structures (poles and stays) of the overhead line and associated temporary works. As a result it can be confirmed that the NSER provides a 'worst case' assessment of likely significant effects on European sites and that this worst case assessment has concluded that there will be no likely significant effects.</p>
Q5.0.3	The Applicant, NE, SC, RSPB, SWT	<p>NSER</p> <p>Although paragraph 3.3.1 of the NSER [APP-029] notes that survey extents and potential ZOIs were agreed with relevant consultees and set out in the Scoping Report, it is not explicitly stated that NE (and other relevant parties) agreed the methodology and confirmed that all of the correct European sites and site features have been included in the assessment. The Midlands Meres and Mosses Phase 1 and Phase 2 Ramsar sites are considered but the Midlands Meres and Mosses SAC is not, although it was raised in consultation responses. Please confirm the agreement of NE and other relevant nature conservation bodies.</p>
		<p>Natural England responded at scoping (letter dated 5th April 2017) and was consulted before and after via the paid-for Discretionary Advice Service, and the consultations also covered the NSER. At no time did Natural England request any alteration to the proposed scope of works or Zones of Influence.</p> <p>Midlands Meres and Moses SAC is noted but scoped out of the NSER due to its distance from the Proposed Development and the absence of mobile qualifying interest species associated with the SAC.</p> <p>Natural England's Scoping Response to the Planning Inspectorate (letter dated 5th April 2017) stated:</p> <p><i>"The development site will be within the vicinity the following designated nature conservation sites:</i></p> <p><i>Midlands Meres and Mosses Ramsar Phase 2</i></p>

ExQ1	Question to:	Question:
		<p><i>Montgomery Canal, Aston Locks SSSI</i> <i>Ruewood Pastures SSSI</i> <i>Brownheath Moss SSSI</i> <i>Sweatmere and Crosemere SSSI."</i></p> <p>All of these sites were considered in the assessment.</p> <p>The European sites and site features are listed in full in the NSER and reflect the site designation citations and conservation objectives as published. Natural England has been consulted on the NSER on more than one occasion and has made no comments. It can therefore be reasonably inferred that Natural England have not identified any omissions in the methodology, on the scope, content or findings of the report.</p> <p>Shropshire Council in its Local Impact Report (REP1-010) states that: <i>"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."</i> (para 5.24)</p> <p>And</p> <p><i>'..... 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 NLSE (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'.</i> (para 5.25)</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
Q5.0.4	The Applicant	<p>NSER</p> <p>The projects considered in the HRA in-combination effects (ICE) assessment are those listed in Table 12.3 of ES chapter 12 [APP-076]. The NSER [APP-029] also refers to a list of projects contained in Table 5.2. Where is this table to be found, and in the light of this please confirm exactly which projects were considered in the ICE assessment.</p>
		<p>SP Manweb has noted that there is an error in the NSER (DCO Document 5.4 (APP-029)). Table 5.2 originally contained the list of cumulative projects. This was removed at the last iteration and cross reference should have been inserted to Table 12.3 in the ES (DCO Document 6.12 (APP-076)). Hence reference to Table 5.2 in the NSER should read Table 12.3 of the ES throughout.</p> <p>The list of projects assessed is as set out in Table 12.3 of the ES (DCO Document 6.12 (APP-076)).</p>
Q5.0.5	NE	<p>NSER</p> <p>Please confirm whether the approach to the assessment is considered appropriate and whether the conclusions of the NSER [APP-029] are agreed in the light of the European Court of Justice 'People Over Wind' judgement.</p>
6. Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations		
Q6.0.1	The Applicant	<p>Land agreements</p> <p>Please provide a schedule showing which of the 43 access points and 7 temporary laydown areas identified in the Transport and Highways Technical Note [APP-032] have been agreed with the land owners.</p>
		<p>Annex B in SP Manweb's Supporting Information lists the access points and temporary laydown areas and the agreements reached with the respective landowners and tenants.</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		<p>It should be noted that there are 44 access points in total. Access AC1 is the existing access to Oswestry Substation and as such was not included in the Traffic and Transport Technical Note (DCO Document 6.1.1 (APP-032)).</p> <p>As Shropshire Council have a right of access across this land it has been included in the Table (A1).</p>
7. Draft Development Consent Order (DCO)		
Q7.0.1	The Applicant	<p>Response to s51 advice</p> <p>Please provide the revised Book of Reference, Statement of Reasons and Land Plans referred to in paragraphs 2.11 to 2.16 of the Responses to s51 advice and Comments on the s55 Checklist [AS-002].</p>
		<p>SP Manweb has included with its Deadline 2 submission:</p> <ul style="list-style-type: none">• Schedule of Changes to the Book of Reference (V1);• Schedule of Changes to the Statement of Reasons (V2); and• Updated Land Plans (V8).
Q7.0.2	The Applicant, SC, HE, EA	<p>Response to matters raised at the ISH</p> <p>Annex F to the Rule 6 Letter dated 20 February 2019 provided notice of an ISH on the draft DCO [APP-012] which was held on 20 March 2019 (ISH1). Annex G to that letter set out a schedule of issues and questions for discussion at ISH1. The Applicant's (and other IPs as appropriate) written response to these matters is requested by Deadline 2 [24 April 2019] and reflected in the revised draft DCO as appropriate, also requested for Deadline 2.</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p>The Applicant's written response, based upon oral submissions at ISH1 was submitted at Deadline 1.</p> <p>A revised version of the draft DCO (tracked changes and 'clean' versions) has been submitted at Deadline 2. This takes into account the oral submissions from ISH1.</p>
Q7.0.3	The Applicant	<p>Heritage assets</p> <p>Given that a degree of uncertainty exists with regard to sub-surface archaeology [APP-062], how is this addressed in the draft DCO [APP-012] in order to deal with unexpected heritage assets?</p>
		<p>The assessment set out in Chapter 8 'Historic Environment' of the Environmental Statement (DCO Document 6.8 (APP-060)), concluded that the direct impact of the Proposed Development on the majority of identified heritage assets would be neutral or slight, with the remainder assessed as slight to moderate. These were of generally low significance: field boundaries, drainage ditches, areas of ridge and furrow, and ponds. These reflect the largely agricultural character of the route, and provide little positive indication of the likely presence of buried archaeological remains.</p> <p>The construction methods will be minimally invasive, with the poles accessed, as far as possible, through existing farm tracks. Installation of the poles will create little sub-surface disturbance beyond the diameter of the poles. This would allow only a limited view of sub-surface deposits and the excavated material.</p> <p>There is little prospect of identifying significant archaeological remains by archaeological monitoring and it is likely that any earlier disturbance, such as field drainage, would have produced surface indication of an artefact-rich site.</p> <p>Archaeological monitoring of construction work is therefore not considered to be a proportionate response.</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p>General mitigation measures for archaeology have been included in the updated CEMP (submitted at Deadline 2).</p> <p>Shropshire Council in their Local Impact Report (REP1-010) WR have noted that: <i>'In overall terms we are therefore in full agreement with the findings of Chapter 8 of the Environmental Statement and the content of the associated Appendices, and therefore wish to raise no objections to the Proposed Development. In particular, we concur with the Statements assessment of the significance and effects upon the designated and non-designated heritage assets concerned. As a consequence we are particularly pleased to agree with the overall conclusion in Chapter 8 that during the construction and operational phases the Proposed Development will have no significant effects on the historic environment. We also agree that no further mitigation measures are necessary, other than those already outlined in the Construction Environmental Management Plan'.</i>(para 5.5)</p>
Q7.0.4	The Applicant	<p>Description of pole types</p> <p>There are inconsistencies between the description of pole types in column 4 of Table 1 of R3 of the draft DCO [APP-012], and the description of the pole types in chapter 3 of the ES [APP-034]. R3 of the draft DCO refers to 7 pole types and these are consistent with the description of 7 pole types shown in Table 3.1 of APP-034, apart from the Terminal H-pole which is presumably the same as the Double H-pole. However, Diagram 3.2 of APP-034 illustrates 6 pole types but these do not immediately correspond to the description in the draft DCO [APP-012].</p> <p>Please provide a note which relates the description of pole types in column 4 of Table 1 of R3 of the draft DCO [APP-012] to illustrations of them and add this note to the list of documents proposed to be certified.</p>
		<p>SP Manweb agrees that there are inconsistencies in the description of pole types between Table 1 of R3 of the draft DCO, Chapter 3 of the Environmental Statement and Diagram 3.2 of APP-034.</p>

ExQ1	Question to:	Question:																					
		<p>The description of pole types in Table 1 of R3 of the draft DCO is correct. The table below provides the description of pole type from Table 1 of R3 with the corresponding description from Chapter 3 'The Proposed Development' of the Environmental Statement (DCO Document 6.3 (APP-034)):</p> <table border="1" data-bbox="792 483 2074 1447"> <thead> <tr> <th colspan="3" data-bbox="792 483 2074 571">Trident Wood Pole Structure Types</th> </tr> <tr> <th data-bbox="792 571 1055 738">Structure Type (Table 1 of R3 of the draft DCO)</th> <th data-bbox="1055 571 1301 738">Pole Type (Ch 3 of the ES APP-034)</th> <th data-bbox="1301 571 2074 738">Clarification</th> </tr> </thead> <tbody> <tr> <td data-bbox="792 738 1055 1086">Terminal H-pole</td> <td data-bbox="1055 738 1301 1086">Double H-pole</td> <td data-bbox="1301 738 2074 1086"> <p>A Terminal H Pole is a double H Pole however the Terminal H Pole includes a cable sealing end. Pole 1 (listed in Table 1 of Schedule 2 to the draft DCO (DCO Document 3.1 (APP-012)) is a Terminal H Pole.</p> <p>A Terminal H Pole is illustrated as 'Typical Trident cable terminal pole' in Diagram 3.2 of Chapter 3 of the ES 'The Proposed Development' (DCO Document 6.3 (APP-034)).</p> </td> </tr> <tr> <td data-bbox="792 1086 1055 1174">Intermediate</td> <td data-bbox="1055 1086 1301 1174">Intermediate (2.5m arm)</td> <td data-bbox="1301 1086 2074 1174">Illustrated as 'Typical Trident intermediate single pole' in Diagram 3.2</td> </tr> <tr> <td data-bbox="792 1174 1055 1262"></td> <td data-bbox="1055 1174 1301 1262">Intermediate H-pole</td> <td data-bbox="1301 1174 2074 1262">Illustrated as 'Typical Trident intermediate H pole' in Diagram 3.2</td> </tr> <tr> <td data-bbox="792 1262 1055 1350">Section</td> <td data-bbox="1055 1262 1301 1350">Section Single</td> <td data-bbox="1301 1262 2074 1350">Illustrated as 'Typical Trident section single pole' in Diagram 3.2</td> </tr> <tr> <td data-bbox="792 1350 1055 1447"></td> <td data-bbox="1055 1350 1301 1447">Section H-pole</td> <td data-bbox="1301 1350 2074 1447">Illustrated as 'Typical Trident Section H single pole' in Diagram 3.2</td> </tr> </tbody> </table>	Trident Wood Pole Structure Types			Structure Type (Table 1 of R3 of the draft DCO)	Pole Type (Ch 3 of the ES APP-034)	Clarification	Terminal H-pole	Double H-pole	<p>A Terminal H Pole is a double H Pole however the Terminal H Pole includes a cable sealing end. Pole 1 (listed in Table 1 of Schedule 2 to the draft DCO (DCO Document 3.1 (APP-012)) is a Terminal H Pole.</p> <p>A Terminal H Pole is illustrated as 'Typical Trident cable terminal pole' in Diagram 3.2 of Chapter 3 of the ES 'The Proposed Development' (DCO Document 6.3 (APP-034)).</p>	Intermediate	Intermediate (2.5m arm)	Illustrated as 'Typical Trident intermediate single pole' in Diagram 3.2		Intermediate H-pole	Illustrated as 'Typical Trident intermediate H pole' in Diagram 3.2	Section	Section Single	Illustrated as 'Typical Trident section single pole' in Diagram 3.2		Section H-pole	Illustrated as 'Typical Trident Section H single pole' in Diagram 3.2
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	Section H-pole	Illustrated as 'Typical Trident Section H single pole' in Diagram 3.2																					

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:		
		Angle	Angle Single (no picture)	Not illustrated in Diagram 3.2
			Angle H-pole	Illustrated as 'Typical Trident angle pole with stays' in Diagram 3.2
Q7.0.5	The Applicant	<p>Access and Rights of Way</p> <p>In relating the provisions of articles 9 to 14 of the draft DCO [APP-012] to the various items shown in the legend to the Access and Rights of Way Plans [APP-008], please explain whether the limits of access to be created, maintained, restored and/or prohibited or restricted shown by the capital letters in blue are intended to restrict these powers.</p>		
		<p>The capital letters shown on the Access and Rights of Way Plans (DCO Documents 2.4.0 – 2.4.16 (APP-008)) are intended to illustrate the limits of access to be created, maintained, restored and/or prohibited or restricted under that group of Articles. Principally they relate to Article 10 under which the specific works identified under Schedule 3 are known to be required. These works may also require the powers of restriction/ regulation under Articles 11 and 12. Article 9 is a general power. At present there are no instances where it is known that Article 9 powers will be required at particular locations.</p>		
Q7.0.6	The Applicant	<p>Access and Rights of Way Plans</p> <p>What is the difference between private road/access (shown in brown) and privately maintained access (shown in red hatching)?</p>		
		<p>A private road / access is an existing track that may be affected by the development.</p>		

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		A privately maintained access is a proposed access that will be maintained by SP Manweb whilst it is being used for the construction and maintenance of the development, for example should the surface become broken up. A privately maintained access will only exist temporarily for the duration of any required work, but it is recognised that during that period some maintenance may be required.
8. Historic Environment		
		None at present.
9. Landscape and Visual		
Q9.0.1	SC, NE, CRT	<p>LVIA and CLVIA</p> <p>Please confirm agreement to the findings of the LVIA [APP-041] and CLVIA [APP-045].</p>
Q9.0.2	The Applicant	<p>Montgomery Canal</p> <p>Please provide a wireframe showing the terminal poles at 36 and 40 pursuant to Table A7 in the Planning Statement [APP-086].</p>
		<p>A wireframe for Viewpoint 8 showing Pole 36 as a Terminal H Pole has been provided as Annex D in SP Manweb's Supporting Information.</p> <p>The wireframes and photomontages (DCO Document 6.6.6 (APP-047)) were produced using the methodology as set out in Appendix 6.1 to the Environmental Statement (Document 6.6.1 (APP-042)). Para 1.3.7 sets out:</p> <p><i>'For each photomontage location a series of high resolution photographs were taken with full sensor SLR camera with 50mm prime lens, which gives an angle of view similar to that of the human eye (approximately 40°).'</i></p> <p>For each photomontage viewpoint a wireframe was then produced.</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p>For all the viewpoints (including Viewpoint 8), the Horizontal Field of View is constrained at 90°. The 3D model is constrained to this angle as well. Viewpoint 8 is taken from the western bank of the Montgomery Canal, just to the south of the point where the Proposed Development crosses the canal. The viewpoint captures a 90° view from this location which includes pole 36 (to the left of the view), pole 37 (to the centre of the view), and pole 38 (to the right of the view). Poles 39 and 40 (the suggested terminal pole) lie further to the right of the view, outside of the viewing frame, and are therefore not visible in this view. Therefore, using the methodology as set out in the ES, and which is in line with current guidance, Poles 36 and 40 would not be visible from the same viewpoint.</p> <p>Since this is an undergrounded option there would be no wirescape between visible between pole 36 and pole 40.</p> <p>A wireframe could be created for the area between poles 36 and 40 at this location, however it would not be comparable with the wireframe already created for Viewpoint 8 or comparable with any of the other wireframes set out in the ES, and it would not be consistent with current industry recognised guidance.</p>
Q9.0.3	The Applicant	<p>Visual assessment</p> <p>A full viewpoint assessment sheet is provided in APP-044 for any viewpoint deemed to experience an effect of minor or above, totalling 33 of the 76 viewpoints. Does this mean such assessments have been carried out for the other 43 viewpoints but not included in the document, or were not considered further?</p>
		<p>Paras 1.2.10 and 1.2.11 of the Visual Baseline, Viewpoint Sheets and Assessment (November 2018) (DCO Document 6.6.3 (APP-044)) note that;</p> <p><i>'Within the initial 5km survey area 76 viewpoints were identified, all of which have been surveyed and considered in relation to the Proposed Development. The viewpoints are primarily associated with settlements, PRow, recreational landscapes</i></p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p><i>or roads. The viewpoints were agreed with the landscape officers at Shropshire Council. Of these 76 viewpoints 40 are within the final 1km study area.'; and,</i></p> <p><i>'Whilst establishing the visual baseline the locations listed in Table A6.3.1 were identified as locations to potentially assess the effects on visual receptors. This table does not include individual properties within 200m of the Proposed Development as these are separately considered in the Residential Visual Amenity Assessment detailed in Appendix 6.5 (DCO Document 6.6.5). The receptors identified in Table A6.3.1 helped inform the selection of the 76 viewpoints. An individual assessment was not undertaken for each receptor as GLVIA3 notes that when undertaking a visual assessment, the emphasis must be on a reasonable approach which is proportional to the scale and nature of the proposed development (paragraph 6.2).'</i></p> <p>A desk top and on-site appraisal was made of the likely visual effects resulting from the proposed development at the 76 publically accessible viewpoints. In line with GLVIA31 guideline, detailed individual assessment sheets were not produced for the 43 viewpoints appraised as experiencing negligible or no effects (due to factors such as distance and intervening screening from landform or vegetation) as a result of the introduction of the Proposed Development.</p> <p>(Landscape Institute/Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013)</p>
Q9.0.4	The Applicant	<p>Visual assessment</p> <p>What is the correct title to the sheet for Viewpoint 34 in APP-044?</p>

¹ Landscape Institute/Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		The correct title of the sheet for Viewpoint 34 in APP-044 is 'The Ditches, PRoW 0230/47/1'.
Q9.0.5	The Applicant	Visual assessment How do the selected photomontages and wirelines included in APP-047 relate to the 76 viewpoints considered in APP-044?
		<p>The seven photomontages were selected to provide a good representation of views across the geographical spread of the study area, and included the five locations where localised significant effects on visual amenity were identified by the assessment, i.e.:</p> <ul style="list-style-type: none">• Viewpoint 14 (near Kenwick Oak);• Viewpoint 23 (near Malt Kiln Farm);• Viewpoint 70 (near Dandyford Farm);• Viewpoint 72 (near The Shayes); and• PRoW 0217/5/1 (east of Malt Kiln Farm). <p>As noted in in Table 6.3 of the Chapter 6 'Landscape and Visual' of the ES (DCO Document 6.6 (APP-041)), the locations of the seven proposed photomontages were agreed by Shropshire Council's Landscape Officer. The Canal and River Trust were also consulted, though no comment was received.</p>
Q9.0.6	The Applicant	Visual assessment Can photomontages and wirelines be provided for all locations where <ul style="list-style-type: none">• section single poles• section H poles• terminal H poles

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		are proposed?
		<p>As noted in the response to Question 9.05 'Visual Assessment' above</p> <p><i>'An individual assessment was not undertaken for each receptor as GLVIA3 notes that when undertaking a visual assessment, the emphasis must be on a reasonable approach which is proportional to the scale and nature of the proposed development (paragraph 6.2).'</i> (APP-044).</p> <p>Photomontage and wirelines have not therefore been provided for all locations where section single poles, section H poles and the terminal H pole are proposed. Annex E in SP Manweb's Supporting Information provides a schedule indicating which poles (and pole types) are shown in each viewpoint and whether they would be visible in the view.</p> <p>Single Poles and Section H Poles are present in the photomontages/wireframes for the following viewpoints;</p> <ul style="list-style-type: none">• VP6 (Junction of B5009 and Berghill Lane, Babbinswood);• VP 8 (Montgomery Canal / Shropshire Way Trail (View North));• VP14 (Prow 0207/14/13 Near Kenwick Oak);• VP23 (PRoW 0217/4/2 near Malt Kiln Farm);• VP34 (The Ditches, PRoW 0230/47/1);• VP70 (Dandyford Farm); and• VP72 (PRoW 0217/12/1 Near The Shayes). <p>The Terminal H-pole is not present in any of the photomontages/wireframes. The viewpoints selected are representative of the locations where there are higher sensitivity</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		receptors and / or locations where significant visual effects were identified. The locations for the viewpoints were agreed with Shropshire Council and the inclusion of a viewpoint encompassing the Terminal H Pole was not requested.
Q9.0.7	The Applicant	<p>Residential assessment</p> <p>What is the impact of the proposed development on the property the subject of RR-002, and has this been considered in the Residential Visual Amenity Assessment [APP-046]?</p>
		<p>No impact on the residential visual amenity of the property as a result of the introduction of the proposed development is predicted. The closest poles to the property are;</p> <ul style="list-style-type: none"> • Pole 143 – approx. 490m; • Pole 144 – approx. 473m; and • Pole 145 – approx. 483m. <p>At the closest point, measured to the centre line of the Order Limits, the property is approximately 472m from the overhead line.</p> <p>As noted in Chapter 6 'Landscape and Visual' of the ES of (DCO Document 6.6 (APP-041)) para 6.3.5;</p> <p><i>'The study area for the residential visual amenity assessment extends to 200m from the Order Limits and is shown on Figure 6.8 'Residential Visual Amenity' (DCO Document 6.14 (APP-081)). This is because at a distance of 200m a 12m Trident wood pole would appear approximately 3.66cm high in the view, which would not create a significant visual effect that would materially harm residential visual. Greater detail on the methodology of the residential visual amenity assessment is provided in Section 1.4 of Appendix 6.1 (DCO Document 6.6.1 (APP-042)).'</i></p> <p>The property has therefore not been considered in the Residential Visual Amenity Assessment.</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
Q9.0.8	The Applicant	Mitigation of visual effects Please explain the full extent of the mitigation considered and the limiting factors to its implementation.
		<p>As referred to in Section 4.6 of Chapter 4 'Approach and General Methodology' of the ES (DCO Document 6.4 (APP-037)), the main strategy for minimising any adverse effects has been avoidance through careful planning, design and routeing.</p> <p>In terms of design, effects have been avoided / reduced by the choice of the Trident design. This design was proposed following SP Manweb's consideration of the technical requirements for the 132kV reinforcement and the local geography of the area. There is no requirement in this project design for earthing or any fibre optic telecommunications wires i.e. a fourth wire. In addition the geography of the area is relatively low level, flat and less exposed to extreme weather which allows for more single poles (approximately 75% are single poles) and greater span lengths in the design. Using the Trident design also results in there being single angle and section poles included in the Proposed Development which also helps to further mitigate visual effects.</p> <p>The Trident design also offers greater flexibility in routeing to avoid / reduce adverse effects and this has enabled SP Manweb to discuss detailed routeing options in response to concerns expressed regarding adverse visual effects by landowners and other stakeholders. Making use of the flexibility in line routeing is evident from the initial routeing stage when broad route corridors (0.5 to 1.0km wide) were assessed and were discounted or identified as preferred. Narrower 100m line route options were then considered and assessed in terms of their likely environmental effects, including visual amenity, with options being discounted due to more likely effects (this is set out in the Line Route Report (June 2016) DCO Document 7.9 (APP-092)). Following the 100m wide preferred line route identified in November 2016, SP Manweb continued discussions with landowners and other stakeholders with a view to avoiding effects, such as, for example, those on the setting of listed buildings at Noneley where in 2017 SP Manweb</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p>considered the merits of the Noneley South and Noneley North options, taking into account the views of Shropshire Council’s heritage adviser.</p> <p>Line routeing to further avoid effects led to SP Manweb then identifying a 25m wide preferred line route in November 2017 which was then presented in the statutory consultation. In response to feedback, which included visual amenity concerns and comments from landowners to avoid farming impacts, and as referred to in Section 3.2 in the Planning Statement (DCO Document 7.1 (APP-086)), SP Manweb made further changes including re-siting poles near Rednal Mill, Lower Hordley and near to Bentley Farm, and re-routeing at the River Roden to avoid impacts on a large mature oak tree and on the banks of the river.</p> <p>In addition to routeing, SP Manweb has incorporated measures to avoid the need to remove hedgerows through the use of existing farm access tracks and the careful siting of poles. Should hedgerow removal be unavoidable then the measures set out in the Hedgerow Management Plan will ensure successful reinstatement.</p> <p>Reinstatement planting to retain the integrity of affected hedgerows, which are important features in the landscape, will further help to screen the Proposed Development thereby avoiding landscape and visual amenity effects. SP Manweb considers the mitigation measures included are reasonable in this case.</p> <p>SP Manweb considers that listening to concerns and amending the detailed design accordingly shows how it has taken time to carefully plan the Proposed Development prior to the submission of the application. SP Manweb considers this is supported by the response from Shropshire Council in its Local Impact Report (REP1-010) which refers to there being no significant concerns raised by the Council to the preferred line route, and to the predicted visual effects being at a level which is compliant with the relevant local policies.</p> <p>SP Manweb has fully considered mitigation including the need for landscape planting however this has not been progressed due to the limited level of moderate effects and no</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p>major effects identified in the assessment. SP Manweb considers this level of effects does not justify planting by way of mitigation.</p> <p>In terms of the limited level of effects, the assessment has identified five significant (moderate) visual effects and one significant (moderate) residential amenity effect. SP Manweb considers this a relatively low number of effects for a scheme of this nature. In the case of the SP Manweb 'North Wales Wind Farm Connection Project Order (EN020014) granted by the Secretary of State in July 2016, a 132kV overhead line of similar length, by comparison, there were 15 significant visual amenity effects and 14 significant residential amenity effects, and landscape mitigation planting was therefore included.</p> <p>SP Manweb is also mindful that planting would not necessarily reduce the effects in this case where four of the effects are on footpaths. Trees planted close to a viewpoint may only provide a temporary interruption to a viewer close to that receptor. When viewed from a further distance the contribution made by any additional planting may be lost when viewed in the wider landscape context, where there is already reasonable tree cover.</p> <p>A further limiting factor can be agreeing planting with landowners, informed recently by SP Manweb's experience in the North Wales Wind Farm Connection Project (EN020014). In that project SP Manweb encountered difficulties in acquiring rights to carry out and to then maintain the landscape planting, as set out in the DCO. Paragraphs 8.12.50 to 8.12.96 of the 'Examining Authority's Report of Findings and Conclusions And Recommendation to the Secretary of State for Energy and Climate Change' (April 2016)² refer to the numerous landowner objections to the proposed mitigation planting on the grounds that additional tree planting adjacent to a public highway would create a safety and liability concern including additional costs for landowners to maintain.</p>

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020014/EN020014-002551-Examining%20Authority%20Recommendation%20Report.pdf>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		<p>(https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020014/EN020014-002551-Examining%20Authority%20Recommendation%20Report.pdf)</p> <p>Notwithstanding SP Manweb's view that further mitigation in the form of planting is not needed for the purposes of the DCO, and that the DCO should be considered by the Examining Authority on this basis, SP Manweb considers there may be opportunities for additional planting outside of the Order Limits where this can be agreed with individual landowners as part of voluntary agreements.</p> <p>SP Manweb is pursuing additional planting proposals with the Canal and River Trust and with various local landowners close to those locations where adverse visual effects have been identified.</p>
Q9.0.9	SC	<p>Mitigation of visual effects</p> <p>Please confirm agreement with the conclusion that no further mitigation can be provided which would reduce the potential operational visual effects of the proposed development from significant to not significant [APP-041].</p>
10. Noise and Vibration		
Q10.0.1	The Applicant	<p>Substations</p> <p>What noise controls are proposed during construction works at Oswestry and Wem substations [APP-038], and how are these to be secured in the draft DCO?</p>
		<p>The updated Construction Environmental Management Plan (CEMP) submitted at Deadline 2 has embedded controls to ensure construction noise is kept to a minimum. The CEMP sets out a number of embedded measures to minimise the potential for disturbance. It is proposed that where necessary, suitable plant and working methods that have the potential to cause noise will be discussed and agreed in consultation with Shropshire Council.</p>

ExQ1	Question to:	Question:
		<p>To ensure noise does not become an issue during construction activities the following principles will be applied when relevant:</p> <ul style="list-style-type: none"> • limiting site work to daylight hours; • appropriate choice of plant and equipment such as low noise generators and quieter plant and equipment as far as reasonably practicable and monitoring of plant and equipment in the event of the receipt of noise complaints, with associated noise attenuation to be provided as required; • regular plant maintenance to keep plant in good working condition; • reduce noise from all vehicles, plant and equipment using effective exhaust silencers; • careful phasing of the proposed operations; and • in locations where there is the potential for noise disturbance, the provision of temporary barriers around static plant (pumps, generators) and equipment liable to create noise whilst in operation as suggested in Section 8 of British Standard 5228-1:2009 Code of Practice for noise and vibration. <p>The CEMP is secured through Requirement 9 of the draft DCO.</p> <p>In addition to the CEMP measures set out the above the draft Development Consent Order (DCO) (DCO Document 3.1 (APP-012)) includes (Schedule 2) 'Requirement 7 Construction Hours' which limits construction work to working hours which are defined as :</p> <p><i>“working hours” means Monday to Friday between 0700 and 1900 hours during the months of March to October and between 0730 and 1730 hours or during daylight hours, whichever is the shorter, during the months of January to February and November to December and between 0700 and 1300 hours on Saturdays with no works to take place on Sundays or bank or public holidays’.</i></p>

ExQ1	Question to:	Question:
		<p>The Local Impact Report (LIR) prepared by Shropshire Council (March 2019) (REP1-010) section 5.33 sets out working hours which are less restrictive than those detailed in the draft DCO.:</p> <p><i>'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'</i></p>
<p>11. Socio-economic Effects</p>		
Q11.0.1	The Applicant	<p>Job creation</p> <p>Is there any quantitative assessment of socio-economic effects, particularly the number of jobs expected to be generated during construction and operation [APP-070]?</p>
		<p>Appendix 10.2 to the ES, Socio-Economic Baseline and Assessment (DCO Document 6.10.2 (APP-072)) (page 9) details that the employment associated with construction of the Proposed Development would be minimal. There would be a limited number of employees required during construction and for maintenance activities during operation.</p> <p>Direct employment created by the scheme during construction would be less than 50 persons (maximum) during the construction phase. A number of these would be specialist contractors that would have the required health and safety credentials and the specialist skills required. These may not be available in the immediate locality.</p> <p>There is an opportunity for some indirect employment generation with opportunities for local businesses to provide goods and services during the construction process (including for example, aggregates for construction, plant hire and transportation of construction materials).</p> <p>Maintenance during operation would be covered by existing staff employed by SP Manweb.</p>

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		<p>Therefore, in socio-economic terms it is considered that, employment generation (direct and indirect) would not have a significant socio-economic effect and so has not been analysed in greater detail.</p> <p>Although indirect employment has not been assessed the Shropshire Council has recognised the economic benefits and growth that the scheme has the potential to indirectly provide. Para 5.4.9 of the Local Impact Report (REP1-010) states that:</p> <p><i>'The provision of additional electricity supply has been a significant infrastructure issue in the North Shropshire area for a number of years. The issue has led to disproportionality in the cost of new electricity connections for local businesses seeking to expand their operations, and to new companies seeking to invest in the area. This has directly led to a loss of job opportunities for the area. Shropshire Council has therefore been in constructive dialogue with SP Manweb about this issue for a number of years before. From a socio-economic perspective therefore, the Council welcomes the proposal and the knock-on economic benefits this will bring'.</i></p>
12. Transportation and Traffic		
Q12.0.1	SC	<p>Local access</p> <p>Please confirm agreement with the conclusions of the Transport and Highways Technical Note [APP-032] that the proposed project would have minimal impact on local access and traffic generation.</p>
Q12.0.2	SC, HE	<p>Traffic management</p> <p>Please confirm agreement with the provisions of the Traffic Management Plan contained within the draft CEMP [APP-036] to control and manage traffic during construction.</p>
13. Water Environment		
Q13.0.1	The Applicant	The Proposed Development

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		<p>The description of the proposed development set out in chapter 3 of the ES [APP-034] and shown on the Works Plans [APP-007] is consistent with the draft DCO [APP-012] with the exception of references in the draft DCO to temporary culverts (Work Nos 2, 3, 4A and 4B) and an area of hardstanding at Wem substation (Work No.5). The only reference made to culverts in the ES [APP-066] is that they will not be required for the temporary access tracks.</p> <p>Please confirm whether these elements form part of the proposed development and, if so, how they have been assessed.</p>
		<p>SP Manweb can confirm that there will be no requirement for temporary culverts for any of the construction works, and these have been removed from the draft DCO.</p> <p>There is no hardstanding proposed at Wem Substation. The works will include a 'hard' stoned area which will be permeable. This has therefore not been considered in the assessment.</p> <p>Any non-permeable areas will connect into the existing site drainage system, via interceptors for the existing substation.</p>
Q13.0.2	The Applicant	<p>Flood zones</p> <p>The FRA [APP-027] states that the existing substations, the majority of the overhead line route and six of the laydown areas would be located in Flood Zone 1 (FZ1); some pole locations and the laydown area at Brookfield Farm would be in FZ2; and some access tracks, principally near Brookfield Farm, would be in FZ3. Figures 5.1 – 5.6 and Appendices 2 and 3 of the FRA [APP-027] identify the fluvial and the surface water FZ2 and FZ3 along the route of the proposed development. However, paragraph 1.2.14 of Appendix 9.2 of the FRA [APP-027] states that both main rivers crossed by the Proposed Development are associated with land in FZ3.</p> <p>Please clarify the position and explain the basis for assessing the route as contained entirely within FZ2.</p>

ExQ1: 27 March 2019

Responses due by Deadline 2: 24 April 2019

ExQ1	Question to:	Question:
		<p>Appendix 9.2 to the ES 'Flood Risk, Water Quality and Resources Baseline and Assessment' (DCO Document 6.9.2 (APP-68)) paragraph 1.2.14 is correct to state that the route crosses areas of flood zone 3 (i.e. an annual risk of 1 in 100) associated with the two main rivers. This is inevitable as it is necessary for the Proposed Development to cross the rivers.</p> <p>The Flood Risk Assessment (FRA) (DCO Document 5.2 (APP-027)) does not assess the route as being entirely contained within FZ2. It identifies construction areas and the permanent structures that are in flood zones 1-3. However, for the permanent structures the FRA considers the effects of climate change when flood zone 3 might extend out to the current flood zone 2. The FRA therefore refers to the current flood zone 2 to indicate the parts of the permanent structure that might be in a future flood zone 3.</p>
Q13.0.3	The Applicant	<p>WFD</p> <p>The chemical and ecological status of the Rivers Roden and Perry regarding compliance with the requirements of the WFD is described according to the EA's classification [APP-068]. Please confirm that an assessment has been made of potential impacts on watercourses as required by the WFD, and where this is contained within the application documents.</p>
		<p>An assessment of potential impacts on water bodies is presented in Appendix 9.2 the ES 'Flood Risk, Water Quality and Resources Baseline and Assessment' (DCO Document 6.9.2 (APP-68)). This confirmed that the impact of the Proposed Development on watercourses, including the rivers Roden and Parry, was Negligible and would therefore have no impact on the chemical and ecological status of these watercourses.</p>
Q13.0.4	The Applicant, EA	Impact assessment

ExQ1: 27 March 2019**Responses due by Deadline 2: 24 April 2019**

ExQ1	Question to:	Question:
		<p>The study area applied to the assessment was 50m either side of the Order Limits [APP-066 and APP-068]. This was reduced from that previously used for the PEIR due to only local impacts being anticipated following further analysis. Please can the Applicant explain the extent to which the reduced study area applied to the flood risk, water quality and water resources assessment described in the ES [APP-066] is appropriate and confirm whether it was agreed with relevant consultation bodies, in particular the EA.</p>
		<p>It was considered appropriate to reduce the study area for the assessment as presented in the ES as the impacts, in any, were found in the PEIR to be minor and only of local significance. In practice this only affected the identification of private water abstractions as other assessments utilised data which was collected on a wider scale. Local water abstractions, not all of which would be licensed, will also be discussed with landowners and tenants in detailed discussions prior to construction. The reduced study area was not formally agreed with consultation bodies however no concerns have been raised.</p>
Q13.0.5	EA	<p>Agreement to assessments</p> <p>Please confirm agreement with the conclusions of the water quality and resources assessment [APP-066] and the FRA [APP-027].</p>
Q13.0.6	EA	<p>FRAP</p> <p>It is noted in APP-068 and the FRA [APP-027] that any construction activity on or near the flood defences associated with the River Roden would need to be controlled through a FRAP granted by the EA. Has a letter of comfort/no impediment been provided to indicate that the permit would be likely to be granted.</p>