

SP MANWEB



Reinforcement to the North Shropshire Electricity Distribution Network

Deadline 3 Submission

Application Reference: EN020021

**Comments on Responses to the Examining Authority's
First Written Questions**

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Examining Authority's First Written Questions**

**May 2019
PINS Reference EN020021**

QA Box

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SP Manweb plc, Registered Office: 3 Prenton Way Prenton CH43 3ET. Registered in England No. 02366937

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SP Manweb's letter to the Canal and River Trust in response to the Trust's letter to SP Manweb 24 April 2019.

1. INTRODUCTION

- 1.1. This document provides SP Manweb's comments on the response to the Examining Authority's First Written Questions by the Canal and River Trust (the Trust), in their Deadline 2 Submissions dated 24th April 2019 (REP2-015) and 7th May 2019 (REP2-019).
- 1.2. It also includes (Annex A) SP Manweb's response to a letter from the Trust to SP Manweb dated 24th April 2019 requesting further information in relation to undergrounding where the Proposed Development crosses the Montgomery Canal.
- 1.3. SP Manweb has no comments on the responses to the First Written Questions submitted at Deadline 2 by Shropshire Council.

2. THE TRUST'S RESPONSE TO FIRST WRITTEN QUESTIONS

Subject Matter:**Update on Statement of Common Ground
(Letter to the ExA dated 24th April 2019)**

...Whilst there are not many matters that remain outstanding, there are some points of clarification required. On 18 April 2019 we sought clarification on these matters from the applicant.

SP Manweb Response

- 2.1. In the latest version of the SoCG in the 'Position Statement on Statements of Common Ground V2' submitted at Deadline 2 (REP2-004), SP Manweb has included changes to the SoCG suggested by the Trust on the 29th March (after Deadline 1) and then on 18th April. SP Manweb has also provided further information in response to queries raised by the Trust. This has included

confirming the height of the poles on either side of the Canal and the conductors as they cross the Canal.

- 2.2. SP Manweb is continuing to liaise with the Trust and is updating the Statement of Common Ground in response to comments received following Deadline 2 and is maintaining an on-going dialogue with the Trust in respect of further comments.

Subject Matter:

The Trust's case

(Deadline 2 Submission dated 24th April)

We are still not convinced that the applicants have assessed appropriately the merits of the case for the undergrounding of the line where it crosses the Montgomery Canal. In particular, the information provided in Appendix 1 of the Planning Statement is insufficient and does not provide a cost/benefits analysis as required by paragraphs 2.8.4 and 2.8.9 of the National Policy Statement for Electricity Networks Infrastructure (EN-5). We have today written to the applicant requesting further information....

SP Manweb Response

- 2.3. As the Trust has now recognised, SP Manweb has provided an assessment of undergrounding where the proposed development crosses the Montgomery Canal in Table A7 of Appendix 1 to the Planning Statement (**DCO Document 7.1** (APP-086) (see pages 101-104)).
- 2.4. The analysis of each potential undergrounding option is specifically structured around the factors identified in paragraph 2.8.9 of NPS EN-5 as set out at paragraph 6.1.1, page 83 of Appendix 1 to the Planning Statement.
- 2.5. SP Manweb's general approach, understanding of the policies in relation to undergrounding in NPS EN-5 are set out in sections 2 and 3 of Appendix 1 to the Planning Statement (pages 70-73).
- 2.6. Paragraph 2.8.4 of NPS EN-5 states:

“wherever the nature or proposed route of an overhead line proposal makes it likely that its visual impact will be particularly significant, the

applicant should have given appropriate consideration to the potential costs and benefits of other feasible means of connection or reinforcement, including underground and sub-sea cables where appropriate.”

- 2.7. As explained in the Environmental Statement and noted in Appendix 1 to the Planning Statement, SP Manweb did not identify any significant visual impacts (let alone particularly significant effects) in the vicinity of the Montgomery Canal.
- 2.8. Nonetheless SP Manweb still went on to consider the costs and benefits of undergrounding where the line crosses the Montgomery Canal in order to address the Trust’s concerns.
- 2.9. As set out above, it did so specifically, on the basis of paragraph 2.8.9 of NPS EN-5 and in Table A7 expressly considered the costs of undergrounding where the overhead line would cross the Montgomery Canal (£870,000) and the landscape benefits of doing so (some localised benefits) and came to a view on the planning balance that the benefits of undergrounding in this location did not outweigh the dis-benefits.
- 2.10. It is not possible to further respond to the Trust. If it is ‘not convinced’ it must explain why. If the information is insufficient, it must explain how. SP Manweb has responded to the Trust’s letter of the 24th April responding to their queries (see Annex A). SP Manweb has responded to the points raised in the letter of the 7th May in this document. SP Manweb has also offered (by email dated 9th May) to meet with the Trust to discuss their concerns.
- 2.11. SP Manweb has gone further than it regards as necessary to address the Trust’s concerns and regards the analysis in Table A7 to be an appropriate and sufficient assessment in particular where the location is not one where policy requires any such assessment at all.

Subject Matter:**LVIA – APP-41****(Deadline 2 Submission dated 7th May)**

The LVIA document itself is relatively generic and sets out the methodology for assessing impacts. We consider that the methodology used is appropriate. We generally agree the findings of the LVIA in terms of the impact on the canal, insofar that it assesses the overhead line at viewpoints 8, 9 and 10 and assesses the impact from these points as being of 'minor significance'. However, the Trust are unable to agree to the findings of the LVIA in totality, as we would like to see further assessment of the visual impact from underneath the lines where it crosses the canal. As stated at Table A6.3.5 of Appendix 6.3 (page 81), at the point the line oversails the canal the magnitude of change would be medium and effects on visual amenity moderate adverse (i.e. significant). We consider that this justifies a further viewpoint/photomontage being provided from underneath the lines where it crosses the canal. This would enable a full assessment of the impact to be undertaken and for the required mitigation to be identified. This in turn may require the viewpoint to be considered amongst the sites assessed at Table 6.4 of the LVIA and conclusions of the LVIA at paragraph 6.9.3.

In the absence of the above viewpoint, the Trust do not agree to paragraph 6.8.2 of the LVIA and the applicants assertion that no mitigation is required. As acknowledged by the applicant, there would be an impact at the point the line crosses the canal, which requires full further assessment to identify whether mitigation is required.

Notwithstanding the above points in terms of the overhead line, this does not prejudice the Trusts position in terms of the potential for undergrounding the line where it interacts with the canal. The Trust have outstanding queries in relation to this matter as set out in our Deadline 2 submission to the applicant, dated 24th April 2019.

SP Manweb Response

2.12. The Trust, in their response have stated that

'As stated in Table A6.3.5 of Appendix 6.3 (page 81), at the point the line oversails the canal the magnitude of change would be medium and effects on visual amenity adverse (i.e., significant). We consider that this justifies a further viewpoint/photomontage being provided from underneath the lines where it crosses the canal. This would enable a

full assessment of the impact to be undertaken and for the required mitigation to be identified’.

2.13. The full comment in Table A6.3.5 is as follows

‘For almost the entirety of the canal path the Proposed Development would be imperceptible and the effects on the visual amenity negligible. However, for a very short section of the path directly approaching and at the point the overhead line oversails the canal, the overhead line would be visible and a new and contrasting element within the view. At the point the line oversails the canal this view of the overhead line would be exacerbated by the necessity to remove some of the canal side woodland and thereby changing the existing views from the canal path further. For this section of the canal path the magnitude of change would be medium and the effects on visual amenity moderate adverse (i.e. significant). However, this significant effect would be highly localised and the overall magnitude of change on the canal path would be low and the overall effects minor adverse.’

2.14. As set out in the ES Chapter 6 ‘Landscape and Visual’ (**DCO Document 6.6** (APP-041) Table 6.3, the locations of the seven proposed photomontages were agreed with Shropshire Council’s landscape officer in January 2018, and these are presented in Appendix 6.6 (**DCO Document 6.6.6** (APP—047)). At the request of PINS and the Canal and River Trust, in January 2018 the draft viewpoint sheets and the proposed location of a photomontage were sent to the Trust for comment. No response was received with regard to this email.

2.15. The purpose of the photomontages are an aid to the assessment. They are not relied upon to form the final judgement of significance. This judgement is informed by many factors including; detailed site survey, site knowledge and an understanding of the visual baseline in the particular location; desk top study, including the use of GIS and Google Earth; experience and an understanding of the nature of the Proposed Development; and an understanding of any tree losses that would occur in close proximity to the Proposed Development.

2.16. The Landscape Institute Advice Note 01/11 'Photography and photomontage in landscape and visual impact assessment'¹ states in Section 1.0 that:

'It is essential to recognise that:

- *Two-dimensional photographic images and photomontages alone cannot capture or reflect the complexity underlying the visual experience, and should therefore be considered an approximation of the three-dimensional visual experiences that an observer would receive in the field;*
- *As part of a technical process, impact assessment and considered judgements using photographs and/or photomontages can only be reached by way of a visit to the location from which the photographs were taken.*
- *When regulatory authorities specify their own photographic and photomontage requirements, the landscape professional should carefully consider whether they are justified, or whether they would under- or over-represent likely effects, in the professional's opinion. Consideration may then be given to adding images to the impact assessment, or omitting them, and explaining the reasons for doing so.'*

2.17. Using professional judgement, the assessment for the NSRP has clearly reported that a highly localised moderate and significant effect is likely to be experienced at the point where the overhead line oversails the canal, however, because of the short section of the canal path that is affected, the overall magnitude of change on the canal path would be low and the overall effects minor adverse. A photomontage was not necessary to reach this decision, since the assessor's knowledge of the location and the visual baseline, the assessor's knowledge of the Proposed Development and the likely implications of its introduction at this location, and the assessor's experience in assessing this type of development, were such that the assessor was able to reach this decision without a photomontage.

2.18. In addition, this section of the Montgomery Canal is very well supported by 3 viewpoints. These viewpoints are located along a 1km section of the canal close to the Proposed Development, and represent views north along the canal tow path, views south along the canal tow path, views into neighbouring fields, and views into Woodhouse Estate from the canal.

¹ <https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/migrated-legacy/LIPhotographyAdviceNote01-11.pdf>

- 2.19. The Trust have stated that *'In the absence of the above viewpoint, the Trust do not agree to paragraph 6.8.2 of the LVIA and the applicants assertion that no mitigation is required. As acknowledged by the applicant, there would be an impact at the point the line crosses the canal, which require full further assessment to identify whether mitigation is required.'*
- 2.20. ES Chapter 6 'Landscape and Visual' (**DCO Document 6.6** (APP-041)), states in section 6.8.2 that *'Given the level of work undertaken to identify the final route of the Proposed Development and number and level of identified significant effects, SP Manweb do not consider that any further mitigation measures, for example new planting, are necessary to mitigate effects of the overhead line and would not reduce any identified 'significant' effect to 'not significant'.*
- 2.21. With regard to this exact location, where the overhead line oversails the canal, any clearance (felling or reduction) of the existing vegetation and trees at this location will be to allow safety clearance for the overhead line. Mitigation planting has therefore not been recommended at this location.
- 2.22. Clearance of the vegetation has been taken into account in the assessment and used to inform the judgement reached above, i.e., *'At the point the line oversails the canal this view of the overhead line would be exacerbated by the necessity to remove some of the canal side woodland and thereby changing the existing views from the canal path further... a highly localised moderate and significant effect is likely to be experienced at the point where the overhead line oversails the canal, however, because of the short section of the canal path that is affected, the overall magnitude of change on the canal path would be low and the overall effects minor adverse'*.
- 2.23. No felling is anticipated and any reduction in the vegetation will be undertaken within the Order Limits, which are 12.5m either side of the centre line of the Proposed Development. Works will be limited to essential works only, and no unnecessary clearance will be carried out.
- 2.24. Whilst natural regeneration of the vegetation along the canal side is anticipated, this will be subject to periodic maintenance to ensure the vegetation does not encroach on the necessary safety clearances required for the overhead line.

Annex A

SP Manweb's letter to the Canal and River Trust in response to the Trust's letter to SP Manweb 24 April 2019.



BY EMAIL

FAO: Tim Bettany-Simmons
Area Planner
Canal & River Trust
Red Bull Wharf
Congleton Road South
Church Lawton
Stoke-on-Trent
Staffordshire
ST7 3AP

Your Ref EN020021
Our Ref: NSRP SJE020

Email:
steven.edwards@spenergynetworks.co.uk
Tel: 0141 614 5656

9th May 2019

Dear Tim

**Reinforcement to the North Shropshire Electricity Distribution Network - EN020021
Planning Act 2008
SP Manweb Plc**

Further to your letter dated 24th April 2019, I am now able to provide you with the information requested and have set this out below. The information is provided under the questions in your letter headed below Trust's Comments which groups the questions into Construction Impacts and Landscape and Visual Impacts.

Trust Comments – Construction Impacts

If the line were to be installed underground between poles 36 & 40, rather than overhead, what would the short/long term construction impacts of these works be on the canal and its environment?

What access would be required for what kinds of equipment and would this result in any loss of vegetation or other visual impacts?

How would it be constructed and what visual and structural impacts would this have on the canal in the short and long term?

How would the canal be protected from damage or leakage during construction?

Would any stoppages be required and if so for how long and why (and how would this compare with any requirements for the installation of the overhead line)?

SP Manweb Response

An underground section between Poles 36 and 40 would be constructed by installing cables in trenches and horizontal direction drilling (HDD).

Details of the works required for the trench sections for the canal crossing are as those set out in the Construction Report (DCO Document 7.2 (APP-087)), see Section 3, which refer to the cable section including the HDD from Oswestry substation.

A detailed assessment would need to be carried out to identify the location of the send and receive pits, however a typical installation would be between 60-75m from the canal side. The depth under the canal would be between 10 - 20m, significantly deeper than that across the A5(T).

In addition, a greater working area, approximately equal to the length of the HDD would have to be created to enable the plastic ducts to be welded together during installation therefore on one side, 120m working area might be required, for the storage of the plastic ducts, machinery etc. This would be within the Order Limits as submitted. This would include construction of termination poles at the interfaces between the OHL and cable sections and the works associated with setting up and drilling under the canal. It is estimated that undergrounding would take an additional 3 weeks longer than the overhead line works.

Construction works would be undertaken in accordance with the Construction Environmental Management Plan (REP2-013) and with the Trust's Code of Construction Practice which is included within the draft Protective Provisions which SP Manweb is seeking to agree with the Trust. This approach would minimise the short/long term construction impacts on agriculture, buried archaeology and groundwater.

SP Manweb's concern is more with the technical and operational impacts when during fault conditions, the time to locate and repair a fault is considerably longer than an overhead line reference to this is set out in paragraphs 4.1.6 to 4.1.9 in Appendix 1 in the Planning Statement (DCO Document Ref 7.1)

With regard to the visual impacts resulting from the construction access for the underground cabling, as noted above, the access track required for construction works at pole 36 is the same regardless of the technology being constructed (i.e., overhead or underground). SP Manweb's concern is with the long term operational access impacts resulting from the need to construct a permanently hard surfaced access road which would need to be installed for a HGV articulated cable test lorry to access and locate the cable fault immediately to repair as soon as possible and limit time off supply for customers. Paragraph 2.2.6 in the Construction Report (DCO Document Ref 7.2) refers to the need for this type of access in relation to the A5 underground section. Therefore, whilst there would be no change to the visual effects (as reported in the ES) resulting from the construction access track, there would be long term impacts from the permanently surfaced accessed road.

The construction of the terminal poles would involve works at 2No pole locations (36 and 40), but would involve slightly more work at each location due to the larger structures required. This work would still be completed over a

short period of time (short term activities). The construction works for the overhead line, as assessed in the ES and set out above required 4 poles (rather than the 2 poles needed for the underground cable). The construction of 2No terminal poles would therefore still result in a minor (not significant) effect.

The underground cabling will introduce an additional visual effect resulting from the trenching and cabling activities, but these will be short term and largely screened by the vegetation alongside the Montgomery Canal. Likely effects would be minor and not significant.

The HDD works will introduce an additional visual effect resulting from the activities at the send and receive pits, and the plastic ducting laid out to 120m from the one of the pits. Again, these will be short term activities and will be largely screened by the vegetation alongside the Montgomery Canal. Likely effects would be minor and not significant.

The landscape and visual considerations associated with the operation of an underground section are considered in the Table A7 in the Planning Statement (DCO Document 7.1 (APP-086)). The assessment concludes that there would be no change to the predicted minor (and not significant) landscape effects at this location

Due to the distance from the Canal banks and the depth beneath the Canal, there would be minimal risk of structural impacts on the Canal in either the short or long term. The closest construction activities would be 60m – 70m from the Canal banks, and 10-20m beneath the bed of the Canal, and therefore there would be no risk of damage or leakage during construction.

SP Manweb would not require a 'stoppage' of the Canal for construction for either an overhead line or an underground connection and construction would be as that for the overhead line which is set out in para 4.2.35 of the Construction Report (DCO Document 7.2 (APP-087)). Therefore, in terms of effects on users of the towpath /footpath of the Canal during construction of an underground connection, as for the overhead line crossing, these would be for a limited time.

Trust Comments – Landscaping and Visual Impacts

Where the overhead proposals show that there would be a loss of the existing landscaping either side of the canal we ask whether this would be retained if the poles were to be located underground instead, and whether there would be any other loss of other landscaping for associated reasons?

Has there been any assessment of whether the terminal poles at 36 & 40 would be visible from the canal and if so, whether this impact is acceptable (and if so, please provide it)?

Has there been any assessment of the visual impact on the canal and its users of the proposed alternative access track that would be required if the line was to be underground, and if so, please provide it?

Has there been any assessment of the visual impact on the canal and its users of the proposed alternative access track that would be required if the line was to be underground, and if so, please provide it?

SP Manweb Response

There would be no loss of vegetation alongside the Montgomery Canal as a result of the construction of an underground cable. No other landscape losses (to trees and hedgerows) are anticipated.

The Planning Statement (DCO Document 7.1 (APP-086)) (see Table A7) notes the visual effects as a result of the introduction of an overhead line are reported in the ES as minor and not significant at this location. Whilst there may be some localised visual benefit from the introduction of an underground cable, it is likely the visual effects resulting from the cabling and introduction of terminal poles at poles 36 and 40 would also be minor and therefore not significant.

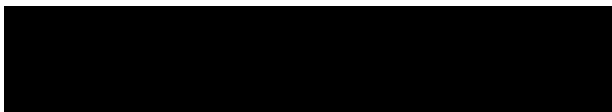
The visual assessment has taken into account the impact on receptors i.e, the canal and its users.

In summary, in response to the Trust's questions above, SP Manweb's concern, as reported in Appendix 1 in the Planning Statement, remains with the technical and operational impacts of a cable section along the overhead line route in a rural area which is difficult to access with the required vehicle and then to repair the fault under the canal. This operation would result in a considerable delay to supplies in North Shropshire, defeating the purpose of the reinforcement project itself. These considerations along with the additional costs of undergrounding outweigh undergrounding under the canal.

I hope the above is helpful to the Trust in forming a position on working with SP Manweb to progress this important infrastructure project.

Should you have any further queries arising from the above, please do not hesitate to contact me.

Yours faithfully

A solid black rectangular box redacting the signature of Steven Edwards.

Steven Edwards
Land & Planning
SP Energy Networks, for and on behalf of SP Manweb