

From: Dafydd I Jones [<mailto:>]
Sent: 17 September 2015 11:45
To: North Wales Wind Farm Connection
Subject: 17 September Deadline

For the attention of Nicholas Coombes

Written representations in reply to the applicant's responses to the Examining Authority's Questions

I write on behalf of 4 interested parties, namely:

IP Reg No 10031225
IP Reg No 10031239
IP Reg No 10031259
IP Reg No 10031261

Q 1.4 – Good Design

IP's do not accept that the applicant has engaged with them in an objective and impartial way. The emphasis has always been on delivering a "least cost" connection rather than prioritising and safeguarding the livelihood and well-being of local residents.

Q 3.19 – Traffic mitigation

IP's remain unconvinced that the local road network has the capacity to reasonably integrate the daily functions of indigenous users and "foreign" movements in the form of windfarm and connection traffic. e.g school transport and farming operations. Local users should not have to tolerate long delays and inconvenience on account of the proposed connection.

Q 4.7 - Land Use and Agriculture

IP's ask how SP Manweb can make the unequivocal statement that the routeing process has sought to avoid Best and Most Valuable (BMV) farmland in Chapter 4 of the ES - Planning Considerations (DCO Document Reference 6.4), when the company has no information concerning the whereabouts of Grade 3(a) land? Consequently, IP's consider the routeing process is seriously flawed.

Q 8.0 – Landscape and Visual impact

IP's remain of the view that the operational burden of the proposed overhead line is unwarranted and they call for an undergrounding solution.

Q 10 - Socio-economic impacts

IP's remain of the view that the tourism offer in the area will be materially damaged by the Connection Project and the wider scheme.

Q 11.12 (g) – Compulsory Acquisition

The Applicant makes the case for compulsory acquisition claiming that the Proposed Development will "support the UK's renewable energy objectives by connecting Derwydd Bach, Clocaenog Forest and Brenig wind farms to the distribution network. Brenig and Derwydd Bach wind farms have the benefit of extent planning permissions whilst Clocaenog Forest has the benefit of a development consent order made in 2014. All three are also supported by connection agreements".

However, the argument is founded on the shaky assumption that Clocaenog Forest, Brenig and Derwydd Bach windfarms will all progress through to generation. Given that Nant Bach Windfarm has already withdrawn (22MW), what guarantee can the Applicant give in relation to the remaining

capacity? What happens if, for example, Derwydd Bach (24MW) does not materialise? There is a strong possibility that the case for compulsory acquisition of connection rights could be founded on a misrepresentation.

Q 11.13 (g - i) – Funding Statement

The Applicant sets out the credentials of the chartered surveyor responsible for undertaking the assessment of compensation costs. Is his compensation estimate of £1.7 million based primarily on a desktop exercise? Is it a firm budget?

The reference to SP Manweb's close relationship with the independent consultancy firm, Freedom Group, is ambiguous and in our opinion does not amount to independent verification of the £1.7 million sum referred to above. In order to avoid potential conflict of interest issues, independent verification should be sought from a third party valuation provider. Until this occurs, there cannot be a presumption in favour of the estimated sum supplied by the Applicant.

Option B

It is understood that Option B has now been deposited by the Applicant. Assuming it is accepted into the Examination process, IP's request that, in the interests of natural justice, equal time is assigned to consider the same as was set aside for Option A.

I trust the above representations will be presented to the Examining Inspectors in the usual way.

Yours faithfully,

Dafydd I Jones

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