

North Wales Wind Farm Connections Project

LAND USE AND AGRICULTURE

Two matter in this application are a cause for concern .
I therefore raise formal objections to both .

- A) The loss of good quality agriculture land.
- B) Safety of agriculture workers and contactors.

The solution to both of above concerns is to underground the cables

I set out my case with reasons as expressed below to the above objections.

A) Agriculture land is classified (provisional map) and protected in terms of quality in PPW

The Ministry of Agriculture ,Fisheries and Food (MAFF) Agricultural Land Classification of England and Wales revised guidelines dated October 1988 provide the criteria for grading of quality agriculture land .The ALC was devised and introduced in the 1960's and Technical Report 11 (MAFF,1966) outlined the national system, which forms the basis to advice given on behalf of Welsh Government on land use planning matters by DEFRA and SEED as an internal consul tee with WG .They also provide technical support to local planning authorities in determining the quality of agricultural land so the procedure required under paragraph 2.8.1 of PPW can be carried out .

The classification is well established and understood in the planning system and provides the framework for determining the physical quality of land at national, regional and local levels. There was a clear need to distinguish between the better land in Grade 3 and other land in this grade . It was no longer considered necessary to maintain a threefold division of Grades 1,2,3 .

Division to Sub Grades

It is important to note in the guidelines and criteria that since 1975 onwards two sub grades are now recognised although not shown on maps. Grade 3 is subdivided. Sub Grade 3a is good quality agricultural land and Sub Grade 3b as moderate quality agricultural land being a combination of the previous Sub grades 3b and 3c.

Scottish Power Manweb reply . See 1 page 102 EN020014 Point 4 and Point 5 .

It states Welsh Government Rural Affairs team provided an outline ALC map based on 1997 data but this contained no detail of sub-division of Grade 3 land.

It is my belief this map and documentation given and used by SMP is the wrong version and therefore inaccurate and the line for erecting the poles has not taken into account the official guidelines as laid down in the MAFF Blue Book of Agricultural Land Classification .

This in my opinion is a clear breach of planning policy as laid down in PPW.

It is well known and understood by DEFRA and Welsh Planning Inspectorate that “cumulative loss” and taking away good quality land “bit by bit” can deplete the county and Wales as a whole of a very important finite resource which must be protected and safeguarded from being used for development purposes.

PPW - 4.10 gives supports to protect Best most Versatile land which is recognised as highly important finite national resource and it’s loss will only be allowed in exceptional circumstances.

If grade 1,2 and 3a is identified in this line corridor an alternative routes on lower quality land should be investigated.. There is no evidence to show the land grading survey has taken place or another alternative route on lesser quality land has been explored or considered by SPM which tends to suggest that land planning policies have been given a lesser priority in this application.

If grade 3b or poor Grade 4 predominates although less significant on a national scale such land can be locally very valuable to the small to medium agriculture units and with unique landscape features add to maintaining the rural economy and population well being through leisure and tourism .

PPW- 3.4.3/3.4.6 Policies clearly state land grading exercise must be carried out when developing larger schemes. This is an essential criteria .It was strictly adhered to by County Council in the preparation process of allocating land for 2012 - 2021 LDP .

The Regional Planning Adviser statement for WG SEED says ALC Surveys must be carried out in strict accordance with the process as laid down in the 1988 revised MAFF Blue Book and there is no alternative method of grading land for planning purposes.

Therefore the present “Provisional” outline ALC map based on 1977 data provided by the Welsh Government Rural Affairs Team which showed no detail on sub-division of land grade 3 can not be relied upon to plan the line for North Wales Wind Farm Connection Project .It was obviously the wrong version of information and wrong date .

WG state that in preparing plans it is important to emphasise that local authorities are obliged to make use of the most accurate and up to date information available to them Surely this same principle must apply to this applicant in this case.

It is abundantly clear there are non compliance with several requirements of PPW and therefore the application is fundamentally flawed .

It does not come close in my opinion to conforming with the requirements of PPW regarding the assessment of grades of land on such a large development .

THE SOLUTION IS TO PUT THE CABLES UNDERGROUND

B) Safety of Agriculture Workers and Contractors

This is a very important and significant issue which I believe has long been underestimated and significantly ignored by electricity companies. Overhead cables are a constant danger to machine driver and animals in time of storms in an industry already known for more accidents and deaths occurring than any other occupation. Now is the opportunity to correct this hugely obvious dangerous practice which affect agriculture workers and contractors despite what is put forward as “safe” by the power companies .

SP Energy Networks by their own evidence are fully aware of the potential dangers that exist to those who operate large tractors, combine harvesters and other high lifting machinery near power cables. They work with North Wales Police in staging mock collisions with power cables while working to highlight the dangers. Last year there were 89 incidents on farmland in North Wales and Merseyside . This is an extremely high number as the harvest and field work involved lasts just over six months of the year. No other industrial sector would have to tolerate having an average of one accident on site per week from electricity lines and poles or no company allowed to perpetually put danger in the way of any workers .

It is totally unacceptable and morally unethical for a company like SPM to continue to expose workers to this high risk of harm when they are aware of the possibilities. It is not sufficient in present day and times to say that information sheets are given out as guidance to farmers about safe working around power lines and then continuing to perpetuate the situation by putting up more overhead lines.

I do not consider the proposed Development complies with the policy test outlined in PPW7 . If this is the case why is the accident rate so very high.

The opportunity to prevent harm and possibly death to workers exists here and now by under grounding these cables for future generations. Is there an answer to why continuing to perpetuate the dangers knowing full well of the danger that exist around power lines is still acceptable ?

County Councillor E Alice Jones
Denbighshire
September 25th 2015