

From: Dafydd I Jones [REDACTED]
Sent: 02 November 2015 16:15
To: North Wales Wind Farm Connection
Subject: Deadline 4

The Planning Inspectorate,
Temple Quay House,
Temple Quay,
Bristol,
BS1 6PN

2 November 2015

For the attention of Nicholas Coombes
North Wales Windfarm Connection Case Team

Dear Mr Coombes,

Deadline 4 –Post Hearing Representations

For Interested parties:

Reg No 10031225
Reg No 10031239
Reg No 10031259
Reg No 1003 1261

My representations concern remarks made at the Issue Specific Hearing held on Thursday 1st October 2015.

Best and Most Versatile Land

At the Hearing, the Applicant was asked to confirm whether or not it had “*commissioned or located an Agricultural Land Classification (ALC) survey which shows whether Grade 3a “Best and Most Versatile” land is affected by the proposed development and the policy implications is so?*”

In response, Mr Westmoreland Smith, for the Applicant, stated that a “worst case scenario” or default position of Grade 3a had been adopted in assessing whether or not land affected by the proposed development was “Best and Most Versatile” land.

It was also accepted that this contradicts the statement made in Chapter 10 of the Environmental Statement - Land Use and Agriculture, which states that “*there is no BMV land affected by the proposed development.*” (Table 10.1 and Paragraph 10.7.1)

I believe this was described as a “mistake” by Mr Westmoreland Smith during the Hearing (Audio recording - at 13 minutes 25 seconds)

In light of the information contained in the application as submitted - ES Chapter 10.7.1, Interested Parties are unconvinced by this reply as the original statement concerning BMV land is qualified by further narrative and reads as follows: “*There is no BMV land affected by the Proposed Development. Therefore the likely significant of effect is minor.*”

If all land was indeed assessed on the basis of Grade 3a, as claimed by the Applicant, then would this supplementary statement have been made?

Interested Parties believe that the Examining Authority's written question 4.7, issued on 3rd August 2015 placed the Applicant in a difficult position. It seems this has necessitated a shift of thinking from "no BMV land" to "all BMV land". In making and justifying the case for its preferred route, this absolute opposite is far less problematic for the Applicant to deal with than is a land corridor made up of a combination of Grades 3a, 3b and 4.

Furthermore, Interested Parties consider Chapter 10 of the Environmental Statement is compromised by the oral evidence given to the Hearing by Laurence Gould Consultants. The expert acknowledges the likely presence of Grade 3a and 3b land within the connection corridor – "...I am clear in my own mind that there is both 3a and 3b ground along the route as well as Grade 4 in the southern sections" (Audio recording - at 17 minutes 25 seconds). However, the approach taken to justify the proposed route fails to consider the difference between land of variable quality and grade. When pressed further by the Lead Member as to the reasons for this approach, a weak defence based on intrusive nature, and time taken for the survey, was offered to the Hearing.

In summary, Interested Parties consider that the Applicant has not sought to minimize the impact on BMV land and as a result Chapter 10 of the ES fails to meet the requirements of Planning Policy Wales.

Yours sincerely,

Dafydd I Jones