

Cefn Meiriadog and Glascoed Road Residents and Users Group

Registration identification number 10031184

NWWFC
EN020014

Responses to ExA's second written questions

Question:

1.1 (c) Please could the Applicant provide its view on whether, even if there was only a single method of construction, a single pole or pylon height and a single set of materials available to all power line developers, that uniform construction could have very different landscape and visual effects at different locations, giving cause for serious concerns at some, but not at others?

The Group notes that the underlying issue concerned was addressed from a different but nevertheless highly relevant perspective in the 'Llandinam 132 kV' report. Under the heading 'Alternative supports for route as proposed', the Inspector states in the Report:

"474. The highly resistive ground at the Llandinam wind farm substation site dictates a need for an earth wire to address public safety concerns, and a Trident design cannot carry an earth wire. I have no information to suggest that relocating the substation to a nearby position would result in more favourable ground conditions [A7, 12.51].

Furthermore, unlike Trident, the HDWP was designed specifically to serve renewable generating stations in remote high altitude areas. If the section of the connection on ground higher than 250m above sea level is to be an OHL, then I am satisfied that it should be of a HDWP design [A6, 73-87].

"475. Nevertheless, during the inquiry SPM were asked as to whether it would be possible that less resistive ground part way along the route would enable a switch from HDWP to Trident to take place. SPM confirms that such a solution, incorporating a RES, would be technically feasible at a broadly comparable cost. Given that a Trident line is much less intrusive than a HDWP, and a RES could be unobtrusively sited and screened, I am of the opinion that this would result in a much more environmentally acceptable solution on ground lower than 250m above sea level. This view is supported by the briefing note sent to PCC members. The probability that no other Distribution Network Operator (DNO) has used such a solution is of no particular significance, other than possibly justifying why the option was not considered earlier [A6, 88 & 89; A7, 12.16, 12.40 & 12.49]."

Question:

8.1 In the Appendices to SP Manweb's Responses to First Written Questions, (PINS Document Library reference [REP1-082]), the Updated Outline Construction Environmental Management Plan v2 (September 2015), paragraph 3.3.2 (second bullet point), states, "Replanting of trees would be partially undertaken as secondary mitigation and partially by agreement with landowners".

(a) Please could the Applicant expand on this statement especially explaining how a reluctant landowner would be accommodated.

(b) Please could Interested Parties provide their interpretation of the above sentence

It is the Group's view that from the statement it is difficult if not impossible to deduce or even guess what might be the spectrum of possible outcomes as regards replanting, and certainly

impossible to get any sense of what the practical results might be (literally) on the ground.

Questions:

12.1 Draft Development Consent Order (DCO) v2 (September 2015) contained the definition of “distribution” which included the words, “...is used for conveying electricity from a generating station to a substation”, and the definition of “operate” which “means one or any of the following: to put or keep working in operation, the distribution and export of electricity together with the running, activating, managing, controlling and utilising that distribution...” whereas the definition of “operate” has been deleted in v3 of the draft DCO and the definition of “distribution” has been changed in the draft DCO v3 (October 2015) to “distribution system” which is “...used for the distribution of electricity from grid supply points or generation sets or other entry points to the points of delivery to customers or authorised electricity operators”.

(a) Does this mean that if the DCO is made using the terminology in v3 of the draft DCO, the cables could be used for the import or export of electricity?

(b) Why has this change been made? and

(c) How can the Applicant justify this change as the ES and application documents are predicated upon the cable connection being the “North Wales Wind Farms Connection” serving four (now three) wind farms?

12.2 Do Interested Parties have comments to make upon these changes to definitions?

The Group is not informed enough to be able to comment properly on this question. However it is aware that in the electricity industry a key distinction is made between supplying the National Grid and supplying end users, and in changing the definitions in this way SP Manweb’s aim appears to be to lump all in together. It should be pointed out that in the ‘Llandinam 132 kV’ report, the Inspector regards the difference between supplying to the Grid and supplying to consumers as relevant to planning matters, commenting as follows in Paragraph 488:

“The costs cited in respect of the four variations include estimated lifetime costs, with repair costs being much higher than for OHLs. These are based on SPM’s own experience and network, although for some reason they are higher than national averages. Be that as it may, either set of statistics are likely to be highly skewed towards urban locations where there is a much greater possibility of roads and footways being dug up. SPM’s point about cable expansion is not convincing and in an intensely rural location such as this much lower fault rates and lifetime costs can be anticipated. It should also be remembered that any faults that would occur would not leave any consumer without a supply [A6, 167; A9, 759-764].” [Emphasis added]

Martin Barlow

Chair

On behalf of 182 members of the

Cefn Meiriadog and Glascoed Road Residents and Users Group

17.11.15