

Cefn Meiriadog and Glascoed Road Residents and Users Group

Registration identification number 10031184

NWWFC
EN020014

Deadline 9: Responses to further documents and submissions made at hearings

1. In the ExA's second set of written questions, the Group wrote in response to questions 12.1 and 12.2 concerning 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...".

2. It would appear from what has been stated since by SP Manweb that the aim of the definition changes is to permit the proposed connection to change from being a connection provided on a statutory basis purely to provide a connection between proposed new wind farms around Clocaenog and the proposed substation near St Asaph, to becoming a permanent part of the National Grid infrastructure.

3. It would further appear that on this basis, from discussions and projections based on 25- and 40-year lifetimes for wind farms and the connection respectively, SP Manweb is now declining to set any discrete lifetime for the connection, regarding it as permanent.

4. In other words, it would appear that SP Manweb is changing the definitions in order to be able to 'legitimise' what they alluded to in their responses to the ExA's first set of questions under 2.11(a) and (b), where they state, among other things:

"2. SP Manweb has referred to an assumption of operational use of the Proposed Development of approximately 40 years in order to allow for decommissioning to be broadly assessed in the ES. However, it is important to note that this is an assumption and if there is an operational need for the Proposed Development beyond 40 years then it may be that the Proposed Development would be in situ for longer than this."

....

"5. SP Manweb does not plan its network based simply on connection to particular assets and is not able to anticipate what new assets may be connected to its network in 25 years' time that may require the on-going use of the Proposed Development. As such, and in line with its duty to run an efficient and economic distribution network, SP Manweb does not consider it appropriate to impose a timescale for the retention of the Proposed Development."

5. The Group contends that this represents a quite major case of 'moving the goalposts' in respect of all the consultation, discussion and examination which has taken place to date regarding the North Wales Wind Farm Connection.

6. Over a number of years members of this Group have attended all stages of SP Manweb's presentation of this project, from the pre-statutory consultation exercises involving exhibitions, etc., through the statutory consultation to the public meetings called to the present examination stage. Until the *draft DCO v3 (October 2015)* was submitted and its meaning spelled out, local residents and other interested parties were clearly given to understand by

SPM that the connection was no more than what the Applicant was statutorily required to provide in order for the energy generated at the proposed wind farms to be brought to the proposed substation. Thus at public meetings with the communities involved, for example on 2 June 2014, representatives of SP Manweb, including Ms Duffy and Mr Paalman, repeatedly stated to audiences whose concern was vocally expressed that the requirement that they provide a connection came purely from their statutory obligation to the wind farm developers once the latter requested one with, moreover, the additional requirement that it be the most economical one. SP Manweb stated clearly and unequivocally that the NWWFC was being undertaken because they had no choice but to develop it, having been requested to do so by the wind farms. The requirement to provide a connection to domestic properties was frequently cited as a comparison.

7. The Group contends that it is wholly unacceptable for the terms of the consultation and examination to be thus changed, not merely in the middle of an extended consultation and examination period but indeed towards its very end.

8. Further, the difficulty for the lay person in fully appreciating the significance in practice of SP Manweb's changed definitions is clear and is most regrettable. The consequent lack of transparency as far as those most affected, i.e. local residents, are concerned, is likewise unacceptable and contrary to the terms and spirit of the consultation and examination.

9. This change simply adds increased force to what the Group wrote in its response of 17.9.15 to the ExA's first set of written questions. Addressing the issues raised by the SP Manweb responses quoted in point 4 above, under *Q 1.4 Design of the Connection, 2*, the Group wrote "...SPM refers several times in its responses to effects of the connection being "reversible" and "not permanent" and to the connection's eventual decommissioning". It pointed out further that

4. In the Secretary of State's recent (7 September) decision on the Llandinam 132kV OHL, it is stated:

"409. SPM notes that the effect of the OHL would be reversible. It should be decommissioned and removed if no longer needed, and as its sole purpose would be to export electricity from wind farm development its life would also be limited to about 25 years [A6, 245]. However, 25 years is a long time and many people alive at the time of the OHL's erection would not live to see its removal."

5. Clearly the Secretary of State's reasoning applies with proportionally more force to the NWWFC."

10. The Group would point out without irony that if it is indeed SP Manweb's intention to maintain the connection significantly beyond the 25- or 40-year lifetime that it has been believed by almost all concerned was the span involved, this offers the opportunity to amortise the cost of an undergrounded connection over a much longer time period and therefore much more affordably than has previously been stated.

11. The Group wishes to state with renewed force its belief in the need to prevent SP Manweb from undertaking any activity of any kind which would in any way damage the ancient track (with hedgerows) referred to in previous submissions as 'the Old Lane' and also 'the bridle way', running between Groesffordd Farm and Plas Newydd in Groesffordd Marli.

The Group has established via discussions with members and a questionnaire that the Old Lane is indeed, as was previously stated, regularly used by numerous members of the community for walking and riding and has been for generations, notwithstanding the fact that official designation as a Public Footpath or Bridle Way has never been sought for it.

12. The Group remains profoundly opposed to SP Manweb's plans to use the 'Groesffordd Marli to Glascoed Road' road to provide vehicle access to the northern end of the proposed pylon line and the following underground section. The road has been described in previous submissions and indeed a site visit was made. The busy school and very narrow parts of the western part of it are key factors which have been mentioned in previous submissions. However any intention to allow vehicles access from the eastern end on Glascoed Road is also very problematic due to the very tight bends and narrow sections, but in particular due to the impossibly difficult turning circle which would be required by any vehicles coming from this direction turning into the field. Indeed turning into the field could only be achieved by destroying a large part of the hedge and by greatly damaging the field itself around any entrance that might be created.

13. The Group therefore suggests that by far the most obvious and least damaging solution would be to require access from the Groesffordd Marli to Cefn road, via fields close to the property Plas Hafod.

14. This should not be seen to imply acceptance of an overhead line, since the Group maintains most strongly that if an overhead route is permitted to extend to the terminal pole currently proposed by the Applicant, the 'skylining' which must of necessity occur will be a very major eyesore in views north and south from either side of the limestone ridge known as the Bryn. It will result in serious degradation of the landscape, especially as perceived by local residents and visitors, and in particular in conjunction with the harm that will be inflicted upon the setting of the nearby historic property of Plas Newydd.

Martin Barlow

Chair

On behalf of 182 members of the

Cefn Meiriadog and Glascoed Road Residents and Users Group

21.12.15