

North Wales Wind Farm Connection

Deadline 10 Representation

Robin Barlow BSc(Physics), PhD(Theoretical Physics) (Your reference: 10031190)

SP Manweb has on 6/Jan/2016 made significant modifications to its planned collector substation (which feeds the NWWF Connection) that could have significant knock-on effect on the NWWF connection. See Agent Letter to PINs via this link and also attached.

<https://acp.planningportal.gov.uk/ViewCase.aspx?caseid=3134331>

select Documents and then the Agent Letter of 6th.

I summarise:

On 30th November RWE, one of the two remaining wind farms operators, notified SP Manweb that they themselves were going to install a 90 MW 33kv/132kv transformer (and 33kv switchgear) in their own substation next door to SP Manweb. They have had planning permission for this all along. They will now deliver their electricity to the NWWFC via a 132kv cable that only needs a simple uplink onto the NWWFC just before the gantry / terminal pole (see layout diagram in the Agents letter).

Now the point of interest for the NWWFC is not the revised site layout of the substation as given in the letter, but in the issue of the earthwire carried by the NWWFC and deemed essential by SP Manweb, with the consequence that a HDWP rather than a Trident Pole solution is required.

The RWE substation now handles the lions share of the NWWFC electricity (80MW to 45MW in the SPM substation). But, RWE does not appear to be using the earthwire of the HDWP and thus must (almost certainly) be earthing its substation within its compound. Mr Westmorland-Smith for SP Manweb, confronted with this at the substation appeal hearing today, seemed to confirm this (along the lines RWE has had planning permission and that must have been for a safe substation).

So if RWE has a local earthing scheme for its 80MW substation, in spite of the “high” resistivity of the ground, then SP Manweb must be able to use a similar earthing solution for its 40MW substation. Therefore the earthline on the NWWFC is not technically necessary.

SP Manweb need to clarify all this.



The Planning Inspectorate Wales
c/o Rhys Rigby
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Your Ref: 3134331
Our Ref: AREAACC01

Email: [REDACTED]
Tel: [REDACTED]

6th January 2016

Dear Sirs

TOWN AND COUNTRY PLANNING ACT 1990
APPEAL BY SP MANWEB PLC
SITE ADDRESS: CLOCAENOG FOREST, SARON, DENBIGH, DENBIGHSHIRE
REF: APP/R6830/A/15/3134331

I refer to the above planning appeal. The purpose of this letter is to update the Inspector on recent developments relating to the Proposed Development.

Paragraph 2.5 of the Hearing Statement submitted by SP Manweb in November 2015 refers to the RWE substation compound for the Clocaenog Wind Farm (which is included in the Development Consent Order (DCO) granted in 2014).

Paragraph 2.5 explains that whilst the Clocaenog Wind Farm DCO included consent for a 132kV transformer within the RWE substation, the design of the Proposed Development included the apparatus necessary to facilitate a connection from the RWE substation. Therefore a 132kV transformer was no longer required within the RWE substation.

Paragraph 2.5 goes on to state that as the RWE substation has consent, the RWE transformer was included in the cumulative assessments carried out by SP Manweb in respect of the Proposed Development.

Paragraphs 3.7 and 5.17 of the Hearing Statement explain why the Proposed Development includes two 132kV / 33kV 90MVA transformers.

On 30th November 2015, RWE notified SP Manweb of its request to vary the connection agreement with SP Manweb. RWE is now proposing to construct a 132kV transformer within the RWE substation (as permitted by the DCO). This means that a new 132kV point of connection (as opposed to the original 33kV point of connection) is required within the Proposed Development.

The practical implication of this request is that there is no longer a need for one of the transformers and associated outdoor equipment within the Proposed Development. As a consequence, the size of the Control Building can be reduced

As the Proposed Development is a shared network compound or collector substation, serving more than one party, this variation had to be agreed by both wind farm developers. As such, SP Manweb duly notified the second customer, Brenig Wind Ltd, of RWE's request.

After considering the implications of this matter, Brenig Wind Ltd confirmed to SP Manweb on 22nd December 2015 that it also agreed to the variation of the connection agreement.

In light of this decision, SP Manweb has prepared the following revised drawings and requests that the Inspector accepts and approves these drawings as a replacement for Appendix 1 and Appendix 2 of the Hearing Statement and the drawings submitted with the planning application:

1. SP 4113182 Rev 3.0 Control Building
2. SP 4113643 Rev 4.0 Site Elevations
3. SP 411 3462 Rev 5.0 Block Plan

To assist the Inspector, SP Manweb has prepared a comparison drawing in Schedule 1 of this letter which illustrates the proposed changes.

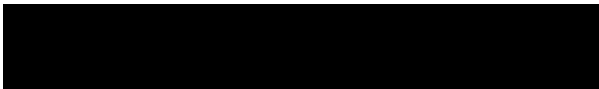
As the changes are minor, SP Manweb considers that the acceptance of these revised drawings will not cause any prejudice to the local planning authority, statutory consultees or members of the public.

It has always been SP Manweb's position that two 132kV transformers are required to facilitate the connection of the Brenig and RWE wind farms to the 132kV Overhead Line. Instead of both transformers being located within the Proposed Development, the revised design is for one transformer to be located within the Proposed Development and one transformer within the RWE substation. As mentioned above, the RWE transformer was included in the cumulative assessments carried out by SP Manweb in respect of the Proposed Development.

SP Manweb has reviewed the Landscape and Visual Impacts and Noise Impacts sections of the Hearing Statement and its technical advisors have prepared an Addendum to the Hearing Statement on the likely impacts following the removal of one of the transformers. The Addendum is attached to this letter. The Addendum concludes that the removal of one transformer does not change the conclusions of the impact assessments.

I hope the above explains SP Manweb's updated position and please let me know if you have any enquiries arising from the above.

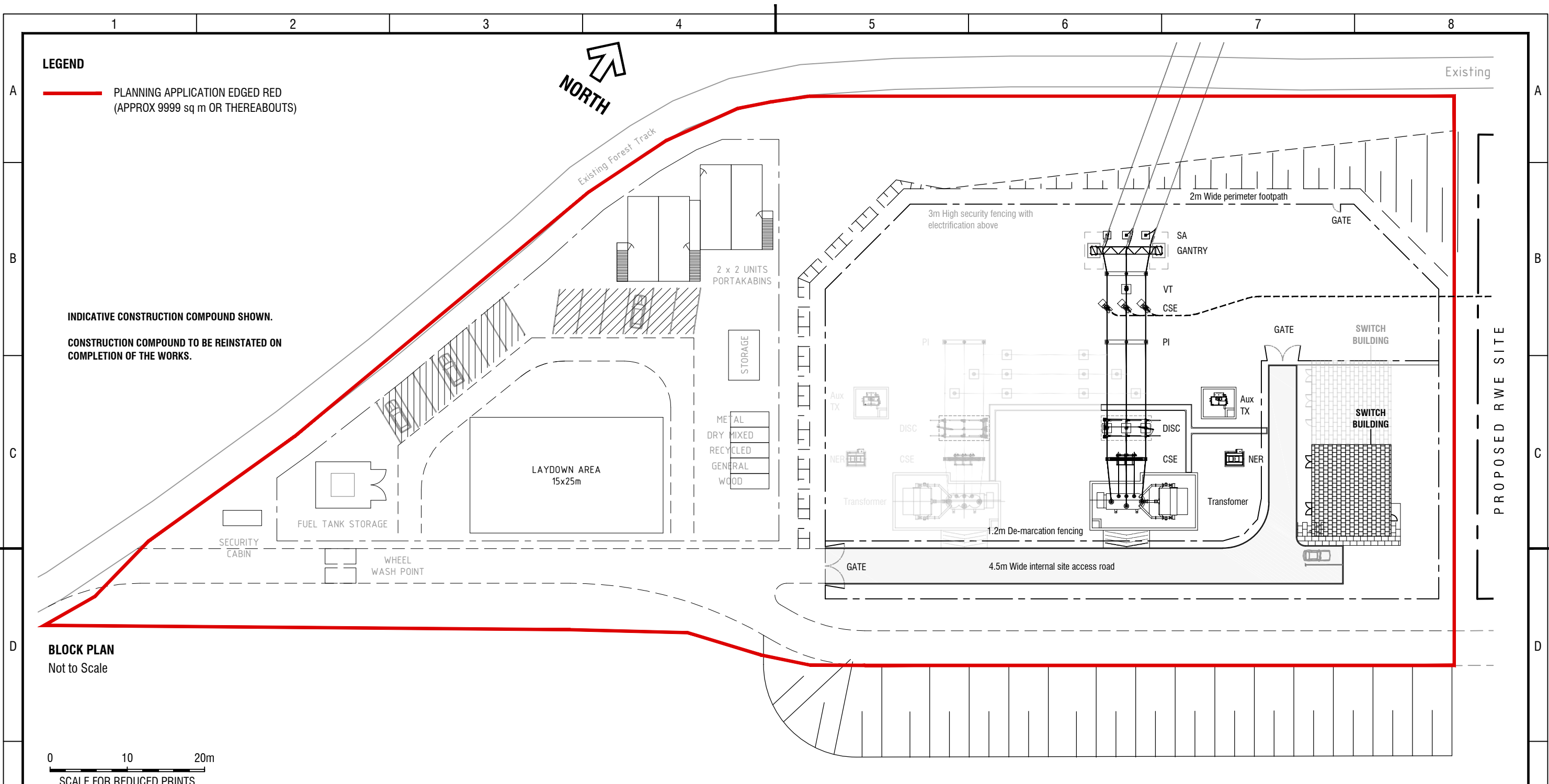
Yours faithfully



Steven Edwards
Senior Environmental Planner for SP Manweb

Copy to: Denbighshire County Council

Schedule 1
Comparison Plan

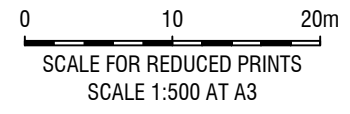


LEGEND

— PLANNING APPLICATION EDGED RED
(APPROX 9999 sq m OR THEREABOUTS)

INDICATIVE CONSTRUCTION COMPOUND SHOWN.
CONSTRUCTION COMPOUND TO BE REINSTATED ON COMPLETION OF THE WORKS.

BLOCK PLAN
Not to Scale



PLANNING NOTES

1. WALL TO SWITCHROOM ...PAINTED RENDER TO BLOCKWORK, COLOUR GOOSEWING GREY (RAL 7038).
2. ROOF TO SWITCHROOM ...SLATE TILES
3. DOORS TO SWITCHROOM ...GREEN GLASS REINFORCED POLYESTER (GRP) FINISHED ALUMINIUM.
4. RWG... WHITE POLYVINYL CHLORIDE (UPVC).
5. FENCE AND GATES ...3.0m HIGH GALVANISED STEEL SECURITY FENCE TO COMPOUND. (ELECTRIFIED STRANDED TOPPING)
6. ACCESS ROADS...ROADS TO BE SUITABLE FOR VEHICULAR TRAFFIC, INCLUDING SPILLAGE COLLECTION TO FUTURE TANKER DELIVERY AREA
7. DRAINAGE...SURFACE WATER FROM ROOF TO DISPERSE INTO SOAKAWAYS OR LOCAL MAINS DRAINAGE. DISCHARGE FROM COMPOUND ROADWAY TO BE Via CLASS 1 OIL INTERCEPTOR.
8. BUNDING...BUNDING OF TRANSFORMERS TO COMPLY WITH SP ENERGY NETWORKS REQUIREMENT FOR OIL CONTAINMENT
9. SURFACE... COMPOUND 20mm STONE, PERIMETER PATH 6mm STONE

Rev.	Date	Drawn	Reviewed	Approved	Reason / Description of changes.
			Status Stamp:		Project:
Contractor:			Status Stamp:		Location: CLOCAENOG
Client:			Date of First Issue: 05.01.2016		Drg. Title: PROPOSED 132kV SUB-STATION AT CLOCAENOG PLANNING APPLICATION BLOCK PLAN - SHOWING PREVIOUS LAYOUT
			Drawn: D.Lee	Rev'd: A.B.	App'd: T.F.
			Drg. No.: SP4134050		Sheet: 001 Next: 001 Scale: N.T.S.
			Contractors Drg. No.:		Rev: 1.0 Size: A3
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Addendum to Hearing Statement of SP Manweb

1. This is an Addendum to the Hearing Statement of SP Manweb plc dated November 2015. This Addendum sets out the landscape and visual and noise impacts of the revised drawings submitted by the Appellant on 6 January 2016.

LANDSCAPE AND VISUAL IMPACTS

2. The assessment presented in the Hearing Statement takes account of the presence of the consented Clocaenog Forest Wind Farm Substation. The removal of a transformer and associated outdoor equipment from the Proposed Development and slight reduction in the size of the proposed Control Building makes no difference to the sensitivity of the receptors, so any changes in the outcome of the assessment as a result of the design changes outlined above will be due to a slight reduction in the predicated magnitude of effect.
3. In terms of landscape effects, paragraph 7.44 of the Hearing Statement concludes that *'overall the low sensitivity of the landscape combined with the relatively small scale magnitude of change will result in a negligible effect on the landscape'*.
4. For views, paragraph 7.70 concludes that, *'the effect of the Proposed Development on visual receptors will typically be minor and therefore not significant. The exception is views from the forest track bordering the proposed site where there will be direct open foreground views of the Proposed Development which represents a large change in the view. Where these views are experienced by people using the track for recreational purposes, the effects are likely to be moderate and therefore significant. These views will however be transient and likely to be experienced by few people'*.
5. Paragraph 7.93 summarises the likely cumulative landscape and visual effects arising from the two substations, the proposed 132kV Overhead Line and the Clocaenog Forest turbines and concludes that significant cumulative effects may be experienced by some receptors, noting that this *'is because the Proposed Development is not a controlling factor in determining the degree of significance, when the individual projects are considered together. The moderate effects will arise as a result of the large (145 m high) turbines and will arise with or without the Proposed Development. Overall the contribution of the Proposed Development to the total cumulative effects is considered to be of small magnitude and minor overall effect. This effect is not considered significant'*.
6. SP Manweb considers that the revised design may result in a slight reduction in the magnitude of landscape and visual effects experienced which, when combined with the sensitivity of the different receptors, may result in a slight reduction in the overall effects experienced. Because the revised design for the substation is only slightly smaller than that assessed in the Hearing Statement, however, SP Manweb does not consider any of the identified effects will fall into a lower category of significance.
7. In conclusion, as noted in paragraph 7.94 of the Hearing Statement, the work undertaken for the appeal supports the conclusions of the landscape and visual assessment as stated in the Environmental Report. The Appellant remains of the view that there will be no unacceptable landscape or visual effects and concurs with paragraph 4.2.2 of the Officer's Report that the *'proposal will not result in an unacceptable impact on landscape character or views'*.
8. Given the minor nature of the revised design, SP Manweb has not seen a need to provide updated photomontages.

NOISE IMPACTS

9. The removal of one transformer from the Proposed Development has already been considered in the modelling in the updated noise impact assessment report (Appendix 8 of the Hearing Statement).
10. The updated noise impact assessment contains noise propagation modelling and results for several different layouts of the Proposed Development. Specifically, the results associated with the Proposed Development containing one transformer and the Clocaenog Wind Farm Substation containing one transformer are provided as “CT1 and RWE” in Table 4-1, Table 4-2, Table 5-1 and Table 5-2 of the noise impact assessment report.
11. The changes to the Proposed Development do not effect the Appellant's position that the appropriate noise limit for the Proposed Development should be 30dB inclusive of tonal penalty.
12. On 24 December 2015, the Appellant proposed wording for a cumulative noise limit condition to the Council. The condition would ensure that the noise from both the Proposed Development and the RWE Substation would not exceed the 30dB noise limit inclusive of tonal penalty. Discussions relating to the revised noise condition are on going between the Council and the Appellant.