

From: Iwan Jones [REDACTED]
Sent: 28 January 2016 08:28
To: North Wales Wind Farm Connection
Subject: Deadline 11 - Submission from Iwan Jones.

Classifying the effect as short/medium term based upon the inclusion of clause 19 in section 2 -

As stated in my previous submission (deadline 10) I don't not agree with classifying the impact on landscape and setting as short/medium term if the DCO is given a 30year life. The evidence suggests (applicants comments - see below, need for future energy ,etc) there will be a need for a connection post the life of the DCO, the ExA or similar body who would decide on whether to retain the line could use the same logic in 30years and assess it on a short/medium term basis as long as that DCO (or similar) only had a limited life. We could end up in a situation that the line would be in existence for 60-90years without anyone making a decision based on the permanent effect on the landscape and setting of listed buildings with it each time being based on a short/medium term effect.

There is an assumption that the landscape and setting would return to normal at year 30. Tree cutting such as at Eriviat Park and at Berain would not be reversible and the hedges and trees replanted at the decommissioning stage could take 15-20years to get established. Would the parkland at Eriviat still be a possible candidate in 30years for the register as Cadw suggests it is now ?, as a number of trees will be cut and there will be a OHL in the middle of it. (following Cadw's comments the application to register the parkland is now being considered by the landowners of the various parts of parkland at Eriviat and the Welsh Historical Gardens Trust have been approached).

The applicant has stated that it is often the case that wind farms repower and that potentially new applications for connections could be required in the coming years or those that pulled out could seek to resurrect their development. All this suggest the applicant is of the view that there will be a need to retain the line beyond 30years. We all know what reasoning the applicant will use to retain the OHL so I won't even start!

If the line is given a 30year lifetime then the cost of decommissioning the line should be part of any assessment, the applicant has explained that decommissioning is a reverse of the building process. The cost difference between OHL and cable becomes minimal as there would be no need to decommission an underground line at 30years. As the public will fund any decommissioning of a OHL at 30years it would not be in the public interest to have this burden and instead the developers should fund the undergrounding of the line at the start.

As ExA you have stated that you have to balance your concerns (landscape & listed buildings) with the public benefit the scheme would bring with regards to connection to renewable energy. In my view the balancing is between one method of connecting the wind farms with another method of connecting the wind farms, at no time during the examination have we stated that the wind farms should not be connected and indeed we have supplied the names of landowners who are willing to make available their land for an underground connection. The applicant has a duty to connect the

wind farms and this will be done even if the OHL is not granted or partially granted as the applicant has the power to lay underground cables to connect the wind farms to the grid. The applicant at no time has stated that should the OHL not be granted or only partially be granted that they would not be able to connect the wind farms.

The applicant has stated that it needs the flexibility of a 5yr period to commence construction this is more than enough time to adapt their plans in fully or part undergrounding of the line will be needed. The deadline quoted for connection of 31st March 2017 could easily be missed for various reasons and indeed within the certificate of difference agreements the wind farm developers have clauses safeguarding their agreements when there are delays to grid connections. The short time until the so called deadline should not be used as a reason to grant consent as it is debateable if it is achievable.

It has been suggested (by ExA) that undergrounding could become cheaper in future as it is done more. The technology is at a fairly mature state and 100s km laid annually. The costs are pro rata mostly based on the cost of cable, labour and machinery. The raw materials used are currently near a 20year low, there are local companies who are experienced cable layers (for RWE and others) all of which makes now a good time to invest in cables. There are no known new technologies in development other than OHL and cable for connecting power generators, batteries are the only other option which would create logistical problems.

If honestly in your heart you believe that the line will be decommissioned at 30years then there is some sympathy to you assessing the effects as short/medium term (compulsory rights would have to match). If you accept that in probability based on the applicants comments and future need for renewable energy that a connection will be required post 30years then the impact on the landscape and listed buildings setting has to be assessed as a long term one. As is often stated when constructing things -

' do the job once and do the job right'

Cofion gorau,

Iwan Jones

