

Jillina Gardiner

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8th November 2015

Brechfa Forest Connection Infrastructure Planning Examination

**Brechfa Forest Connection (EN020016)**

Your reference: 10031819

I have spent 30 years as a volunteer on Rights of Way issues, during which time I have been called upon to assist many riders who have had their horses injured or killed in road traffic incidents. I moved to Brechfa in 2001, having decided to relocate to an area with safe off road riding when I dropped out of the rat race. The facility of having on my doorstep publicly owned land which was designated as a safe area for horse riders was a key reason for making a home and establishing a business in this area.

I am a member of Carmarthenshire Local Access Forum, an organisation created as a result of the Countryside and Rights of Way Act to provide advice to Carmarthenshire Community Council on issues relating to rights of way and open access land such as Brechfa Forest. I also led the consultation and editing of the submissions on behalf of Carmarthenshire Riders for the planning application for the wind farms in Brechfa Forest and on Llanllwni Mountain.

I can confirm that WPD have not consulted the Local Access Forum on this planning application. Closure of any area of open access land to the public is one of the specifically specified situations in the Countryside and Rights of Way Act in which the LAF must be consulted.

WPD mention that in some locations they could not access public rights of way because they found locked gates or overgrown vegetation. In both situations, Carmarthenshire County Council have a statutory duty to resolve the problems and reopen the public right of way to the public, so WPD should have included an assessment of the impact on users of that right of way of the power line. The question is raised on how they were able to survey the route of the power line, but unable to make an assessment of the views from a Right of Way along the route because of locked gates.

I strongly disagree with WPD's assessment of the impact on the residents and local economy of this power line. I do not believe that sufficient effort has been given to considering mitigation for those impacts. It appears to me that the focus has been to keep costs down (and profits high for the wind farm developers) with no information published on the assessments of the relative environmental impacts of alternative routes.

Every section of forest tracks which will be closed to the public during construction of this wind farm / power line, and lost to the public post construction has a high impact on the quality of my life and of all of my neighbours who also have horses or have moved to this area for the recreational benefits of the forest. The analysis of impact on the community does not reflect the information I witnessed being provided to WPD during the community consultation of how important the peace, quiet and attractiveness of the forest for recreation is to residents.

I am very concerned that in the rush to maximise profits by completing construction before the UK governments reductions in subsidies for wind farms takes effect, the safety of residents, especially walkers, horse riders and cyclists forced onto the roads because of the closure of the forest for both construction of the turbines and power lines has not been considered. There has been insufficient analysis of the traffic movements for construction traffic, the 'rat runs' which will occur to avoid delays. There has been no analysis of the locations of tourism businesses and livery yards, or levels of use by the public of roads to reach alternative access points to the open access land or diverted rights of way while sections of the forest or rights of way are closed for construction.

In my roles as the owner of a tourism business, and as chairman of the tourism cluster group for the area I have submitted responses focusing on issues important to each group. However, I have been so concerned by the responses to suggestions for mitigation at the public meetings, that I felt there was a need to comment on these concerns as an individual.

All of the residents, political representatives and the county council have voted that they consider putting the grid connection underground as the only acceptable level of mitigation. There is no audited information in the planning application on the relative costs of putting the power line underground.

It has also been a popular proposal with the local community that an alternative option would be combining the power line with that from Altwallis wind farm. At the time of the meetings with the community it was planned that the requirement was to provide a grid connection for multiple wind farms. The question on why this proposal is not viable now that the planning application is for a single wind farm has not been addressed in the planning application.

During the public meetings I attended, I witnessed WPD employees responding to suggestions, and requests to mitigate issues by saying that it was not possible to provide any mitigation because Npower were not willing to pay for it. I believe that this is reflected in the planning application. For example. it documents that Carmarthenshire County Council proposed a number of options of upgrading existing substations on pylons. One example is that a substation near Carmarthen could be upgraded and the power lines added to existing pylons. It would clearly be more environmentally friendly to upgrade an existing sub station and refit an existing line of pylons, than constructing a new power line. Yet there is no detailed information on the reason for refusing this alternative.

From other information in the planning application I feel it may be helpful to clarify if the reluctance of WPD to consider this form of mitigation is because they are not able to undertake work on lines over 132K, so they would be unable to carry out work on these pylons and substations.

Out of 136 pages on landscape and visual impact in the planning application only 3 are given over to mitigation. One example of the penny pinching is that there is talk of planting screening for

residential properties, but not for sites where the views from public rights of way or open access land will be adversely effected by over head lines.

I fully support the communities view that if the wind farm development goes ahead, the only level of mitigation appropriate would be to put the grid connection under ground for its whole length.

Yours truly

Jillina Gardiner.