

## GRWP BLAENGWEN

Mailing address: c/o [REDACTED]

Mr Martin Broderick (Examining Inspector)  
3/18 Eagle Wing, Temple Quay House  
2 The Square  
Bristol BS1 6PN

**Our Ref:** EN020016

**Your Ref:** BFC-003

**Date:** 04 November 2015

Dear Mr Broderick,

### **Application by Western Power Distribution for the Brechfa Forest Connection**

Thank you for your correspondence detailing the procedure and examination timetable for the above application, following the preliminary Meeting on 6<sup>th</sup> October 2015.

Firstly, please could you take note of a 'procedural decisions' issue that has caused some confusion – in your letter under 'Deadlines for receipt of submissions' it is stated that 'All deadlines are 11:59pm on the date stated'. Yet, in Annex B, the 'Timetable for examination of the proposal' all deadlines are given as 'at noon' – please could you confirm which *time* prevails.

Secondly, we are notifying you of our wish for a Grwp Blaengwen representative to have the opportunity to make oral representations at the evening open floor hearings and the December issue-specific hearings. The topics that we might wish to address are those included in our Written Representation.

Finally, please find herewith our Written Representation as an interested party.

Yours sincerely,

*L R Morris*

Ms L R Morris

Secretary Grwp Blaengwen

On behalf of Grwp Blaengwen members.

# GRWP BLAENGWEN

Mailing address: c/o [REDACTED]

## Brechfa Forest Connection Infrastructure Planning Examination

### Written Representation of Grwp Blaengwen

Ref: BFC-003 EN020016

Date: 04 November 2015

**Grwp Blaengwen** is a group of local people highly concerned about the impact massive developments such as wind-farms and associated infrastructure are having on our lives, livelihoods and our local environment of which we are passionately proud.

As individuals, and even as a group, we have struggled to communicate with the huge development corporations and statutory authorities involved in these developments and to get straightforward, honest answers to our queries and concerns. We are relying on this inquiry to do this for us regarding the Brechfa Grid Connection.

### SUMMARY

Our Written representation includes:

- Our Position Statement
- Our concerns about route options not having been explored extensively enough
  - The route itself and possible alternatives
  - Undergrounding (whole route)
  - Undergrounding (sections of the route)
- Issues where we believe insufficient mitigation measures have been proposed
  - Farming
  - Tourism
  - Property Values
  - Construction Traffic management Plan
  - Tree-felling/hedgerow removal
  - Hydrology
- Other concerns
  - Land ownership
  - Monitoring and enforcement

### **Position Statement:**

We do not agree with the proposal in its entirety, in the same way that we continue to be opposed to the wind-farm development(s) it is intended to serve.

However, if the connection is granted permission, we are of the opinion that the whole route should be under-grounded to minimise long-term impacts on the local environment, communities and economy.

We do not believe that sufficient mitigations have been explored and/or applied to many of the aspects of this build.

Decisions have been reached with *cost (monetary)* as the main factor – immediate financial cost to Western Power Distribution's client as opposed to both the immediate and long-term costs in many forms to local people; and with *speed of delivery* as a major factor – to avoid disruption to the construction timetable and meet the commissioning timescales, operational and profit-potential needs of their commercial client (RWE), rather than considering the impact these concurrent constructions will have on local communities.

### **Alternative route(s)**

We have not been convinced that all possible 'alternative routes' to this lengthy option have been explored, in particular following the withdrawal of the requests for the connection to serve two additional wind farms (Bryn Llewelyn and Brechfa Forest EAST).

At consultation stage and in the local meetings held by WPD, we did not get a satisfactory explanation as to why the existing Alltwalis connection could not be upgraded, rendering this whole proposal unnecessary. Nor were any alternatives offered for Sections C4, D1 or D3 in the WPD 'Preferred Route'. The need for upgrading from wooden poles to metal pylons on the Alltwalis line was when WPD was being asked to supply a connection for THREE wind farms – this may no longer be a relevant reason for dismissal of this proposal now that the connection is just for ONE wind-farm. So, we are asking, could the fittings on the existing wooden poles not be upgraded to carry the Brechfa West output?

Apparently, routes have also been discussed which involve upgrading existing sub stations and upgrading the fittings on existing pylons on a range of the existing power lines, including from the north and south of Carmarthen. WPD say they rejected these options on cost and environmental impact grounds, yet we have been unable to establish why doing work on an existing set of pylons and substation is more environmentally unfriendly than building a lengthy new power line?

We also believe that CCC proposed moving the substation in the forest to mitigate the impact by reducing the length of power lines, but we do not know why WPD have rejected this proposal.

We have been unable to locate in the documentation provided, any third party analysis of the costs/environmental impact of upgrading existing lines as opposed to constructing an entirely new connection and/or moving the location of the substation to the western edge of the forest.

The current proposal requires massive and unnecessary felling in order to take the cabling through to the far side of the forest from the rest of the grid route, whereas the grid connection could be terminated on the western side of the Brechfa Forest West (BFW) site, instead of being taken across the forest to the eastern edge.

### **Undergrounding (whole route)**

Our preference, and the preference of the local communities along the route, and the expressed preference of local organisations affected, including Carmarthenshire County Council (CCC) whose previous leader also instigated a petition for this, and the preference of our AM and MP amongst others, is for the undergrounding of the whole route. This has been discounted by WPD on economic grounds (i.e. cost to their client!), despite the weight of local opinion.

At the 'consultation meeting' in Alltwalis we were told by WPD representatives that, '*weather permitting*', it is possible to get to repair OHL more quickly but UGC is less subject to damage. If climate change continues and storm damage to OHLs continues to increase as a trend, then long-term, UGC is more cost-effective, but '*they can't afford*' to do it now.

Yet, the long-term ecological cost of having to keep vegetation cut back away from OHLs has not been quantified.

A show-of-hands at the same meeting, when the hall was full to overflowing and some people had to remain outside, was almost unanimous (with just a couple of people abstaining) for undergrounding of the whole route.

To the north of Carmarthen the visual impact of pylons and overhead cables creates an unsightly and intrusive element in a landscape that is at present largely pristine. To the south of Carmarthen the cumulative impact with existing OHLs needs to be considered more thoroughly.

### **Undergrounding (sections of the route)**

We do not believe that WPD has even given sufficient consideration to undergrounding *sections* of the route, particularly where overhead elements are close to heritage assets, close to residential properties, are along roadside verges, have significant adverse effects on the landscape, or require excessive felling of trees and hedgerows.

For example, the connection across the forest could be undergrounded which would prevent two-thirds of the proposed tree-felling.

The roadside verge is an important asset for the safety of walkers and horse riders, both of whom are designated as vulnerable road users who need refuge from the dangers of conflict with motorised traffic. The use of poles and overhead lines reduces the width of verges forcing them closer to, or on to the road.

## **Insufficient Mitigation Measures**

Grwp Blaengwen members are also very concerned about the insufficient mitigation measures proposed in the application to minimise a variety of impacts on local people, their communities, economy and environment.

In no particular order:

Our local economy, and hence the well-being of local people, is dependent on two main industries – farming and tourism.

**Farming** - Although UGC connection would cause more disruption to landowners in the first instance, once the land has been restored thereafter disruption would be negligible, without the need for access to their land for maintenance of poles/cables etc. which can put livestock at risk.

**Tourism** - We are particularly concerned about the effects on tourism – some of our members were tourists here before becoming residents and visited this area for its relatively unspoiled non-industrial landscape, rich in heritage assets, eventually moving here for that very same reason.

Now, we are already hearing anecdotally, of a decline in holiday bookings, or more worryingly, of regular guests/ visitors to the area rushing to book a 'last-time' stay before the area is ruined for them and they have to holiday elsewhere.

Historic and heritage sites no longer have the same appeal, atmosphere or sense of place when surrounded by out-of-scale industrial elements. Heritage sites are an irreplaceable resource which has recently been recognised by the Welsh Government by the introduction of the Heritage Bill, seeking to encourage access to and appreciation of the historic environment, both by local people and visitors, and maximising the value of this to the Welsh economy. This community has been the first in Wales where volunteers have obtained grant funding to help produce materials to assist local schools, residents and tourists to visit heritage sites. Trailing overhead cables on pylons across our historic and beautiful countryside, including adjacent to these heritage sites, is in direct conflict with this policy, when at the same time the Welsh Government is trying to encourage other communities to follow our example.

We also believe that the cumulative effect with the TWO wind-farms (Brechfa Forest West and Alltwalis/Blaengwen) challenges the Holford Rules.

**Property Values** – As more industrial elements are added to this very rural area, our property values are decreasing and it is becoming more difficult, if not impossible to sell up.

**Construction Traffic Management Plan** – we insist that, especially as the construction of the BFC and BFW will be concurrent, mitigation to minimise traffic disruption and congestion is finely detailed – not only so that local people can continue their daily lives without negative interruption, but also because the A485 is the main and only arterial route for the emergency services, in particular ambulances to the A&E at Glangwili Hospital. Any planned closure of the A485 and use of protracted rural diversion routes is not acceptable.

**Tree-felling/hedgerow removal** – WPD has confirmed that OHLs require a swathe of felling three times the width needed for UGC and then maintained for the lifetime of the OHL - to prevent trees falling on to the lines – this would mean that there could be no re-planting for the lifetime of the grid connection.

We were told by WPD “A hectare is 10,000 square metres or 100m by 100m. A 60m wide felled area to enable OHL therefore equates to six hectares per kilometre in a straight line” whereas a 20m felled area for UGC equates to only two hectares per km.

We still need to import 80% of our timber needs. The UK has 13% woodland cover which is less than half the global average. Production will be in decline within less than 15 years so it is vital to replace felled trees. It takes 2 years to plan new woodland, before planting even begins and it is not a fast-turnaround industry, trees taking 35-40yrs to grow to harvestable maturity – we therefore need to be replacing every tree we fell!

In light of the above we do not consider that WPD have provided sufficient mitigation measures for the substantial tree-felling and hedgerow removal required for this project, including planting replacement schemes, who will be responsible for planning and implementing these and for their maintenance.

In addition, we are led to believe by CCC, that sections of ancient woodland will be affected as well as managed woodland – and ancient woodland is irreplaceable!

A substantial and detailed re-planting scheme should be established to mitigate for the proposed amount of felling and the type of woodland being felled. Where forestry is to be felled and OHL means it cannot be replanted, it cannot be acceptable to say that mitigation is not needed. What about the reduced carbon-capture?

**Hydrology** – please can the Examining Inspector confirm that sufficient mitigations are in place to protect the water supplies of properties neighbouring the proposed construction route – we have heard that some people are extremely concerned that their water supply could be affected – leaching of chemicals from the poles into water courses and in particular into spring water sources relied upon by some for both themselves and their livestock, seem to be a primary concern with insufficient reassurance from WPD.

**Land ownership** - Grwp Blaengwen is very concerned about the speed of this application process, for a route that crosses so much land where WPD has failed to establish ownership – some 122 parcels of land possibly amounting to some 300 acres.

From the maps it would appear that some parcels of land include sections of access track – if WPD obtain ownership of these parcels, in theory they could prevent access across these, or require a rent to cross over them in the future. Can the Examiner confirm for us *how* any affected landowners' traditional use of these tracks will be protected so that they don't lose these rights.

We would ask the Examining Inspector to ensure that the interests of the 'unknown landowners' are safeguarded and that he is assured that WPD are doing everything possible to establish ownership details and make the appropriate contact.

**Monitoring and enforcement** – Past experience has shown us that this is a major area of ‘let-down’ for those of us affected by major developments. Monitoring and enforcement responsibilities should be established during this process and the financial and resource capability confirmed by those to whom it has been allocated.

Finally, although we know this is not for discussion at this inquiry, it seems to us that the energy needs of urban/city environments take precedent over the impact on the people most affected by these industrial developments in the countryside.

However, the very least we should expect if these developments are given legal approval is to be listened to and that sufficient mitigations are established to go some way to protecting our environment, our livelihoods, our amenities and our properties/land. In other words, that we and our way of life, are not sacrificed ‘for the greater good’.

Submitted by:

*L R Morris*

Ms L R Morris

Secretary Grwp Blaengwen

On behalf of Grwp Blaengwen members.