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Subject: 151213 EN020016 Grwp Blaengwen - Post-Issue Specific Hearing Representation
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Attachments: [Final Written Representation of Grwp Blaengwen \(for deadline 17th Dec\) - including Oral Representations given at Issue Specific Hearing 08.12.2015.pdf](#)

FAO Mr Martin Broderick Examining Inspector for Brechfa Connection Inquiry

I have attached a further Written submission from Grwp Blaengwen, following the Issue Specific Hearing on 8th December 2015

Kind regards,

Ms Lyn Morris (Secretary)
on behalf of Grwp Blaengwen members

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**Final Written Representation of Grwp Blaengwen, prepared for deadline noon 17th December, including *Transcript of Grwp Blaengwen's Oral Representations at Issue Specific Hearing Tues 8th Dec 2015 18:00 at Theatr Gendlaethol, Y Llwyfan, Carmarthen (in italics)*
Presented by Lyn Morris, Secretary, Grwp Blaengwen**

I introduced Grwp Blaengwen at the Open Floor Hearing on Tuesday evening 1st December, as a group of local people, highly concerned about the impact massive developments such as wind-farms and associated infrastructure are having on our lives, our livelihoods and our local environment of which we are passionately proud.

At the Issue Specific Hearing, Tuesday 8th December I gave the Inspector the following additional information about the Grwp:

Grwp Blaengwen currently has 45 members representing 29 households, which could be considered a large group in terms of the rural and disparate nature of our community.

The members nearest to poles as far as I am aware, are Les and Pearl Birch who will have poles on their boundary and have made both Written and Oral Representations independently.

I reiterate that 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.

We have tried to avoid being emotive in our submissions and adhere to the facts as we see them as lay people, but I feel bound to say to both the Inspector and Western Power Distribution (WPD) that emotions amongst local people are running very high.

Landscape and Visual Impact:

WPD said at the Open Floor hearing that the LPA and NRW had assessed the mitigation of OHL as sufficient – apart from two short sections. It would be good to know please which sections and why the mitigation has been considered inadequate.

This was covered in the Issue Specific Hearing and explained in detail by John Champion representing both NRW and CCC on technical landscape and visual matters. We now understand that this refers to the two spans covered by poles 84-86 on the South side of the Towy Valley where there was a concatenation of lines in the area and these poles, being of 3 different specifications would cause an additional visual mass.

We also understand that WPD have now acceded to the proposal that this section should also be undergrounded, with the potential change detail and consultation requirements to be put before the Inspector following the procedural decisions that PINS require.

Route Optioneering:

We were told at the Issue Specific Hearing that route optioneering and the final route proposed has been secured within the relevant Statements of Common Ground.

However, to save so many hectares of forestry having to be removed we *still* feel the solution proposed by Carmarthenshire County Council should be adopted – i.e. to position the substation at the SW of the forest and hence closer to the rest of the proposed grid route, rather than at the far SE corner of the forest. When we suggested this at the Open Floor Hearing Tues 1st December WPD's QC's response was that WPD has no control of this – it was set in the DCO by the Secretary of State.

We beg to differ – firstly, surely WPD is in a position to advise their client, and secondly, we didn't suggest it was in WPD's remit to relocate the substation – we suggested that, and I quote "Perhaps Western Power and Carmarthenshire County Council could jointly invite the Planning Inspector to require the grid connection to start at the SW corner of the forest, and then RWE would be obliged to seek the planning permission (or an alteration of the planning conditions which the Council will be overseeing)". RWE shouldn't find this impossible – they have already asked for modification of elements of the DCO – such as larger turning circles for lorries, moving the tracks in the forest and the cabling between turbines, so why not put in for re-siting the substation as a modification to the DCO?

We would also like to reiterate our point about the lack of proper, comprehensive and documented consideration of other alternative routes.

Whilst it might have been impossible to accommodate the output of three additional wind farms by upgrading, can we be certain that upgrading has been properly reconsidered since the news that one wind farm had been refused, another withdrew its connection request, and the remaining one's capacity dropped from a potential 84MW to 56MW?

WPD says this was "rejected *early on* for costs and engineering reasons." So, a long while before the transmission requirement was dramatically reduced! We are told that the upgrading of the Alltwalis connection was never an option because it is already running 10% over capacity. Perhaps that is an argument for it to be a serious option - that it NEEDS to be upgraded, in order to cope with the full output of the Alltwalis wind farm, and for Alltwalis to achieve its full production potential, and that this could have been done hand-in-hand with providing a link for Brechfa West. One hundred upgraded towers might be considered less of an adverse impact than hundreds of new poles, along a new route, involving further landowners and affecting a much larger area and number of local communities.

We are not saying this is necessarily so – we are saying that the public has not been consulted on whether an upgrade of an existing line would be preferable to an entirely new and lengthy line. Nor have we had an explanation as to *why* the creation of a new line would cost less.

Likewise, no alternative route to Section D3, crossing from west to east across the forest, was ever offered. We addressed this in our Open Floor submission, pointing out that CCC had raised the question of exploring alternative routes, and that even if RWE refused to apply to move the substation there were shorter routes out of the forest. We have not received satisfactory explanations as to why D3 is the only possible route alignment.

As a brief aside at this point, we would like to challenge WPD's QC's response at the Open Floor Hearing that the amount of tree-felling incurred by this route was inconsequential because it fell within normal managed felling of the forest by NRW. If you look at the map of the tree-felling to

create spaces for the turbines and the 50 or 60m swathe required for the OHL, it is clear that these cannot coincide with blocks of mature trees ready for commercial felling. Moreover, the swathe cannot be re-planted for the lifetime of the grid connection, so that in itself does not fall within normal commercial management. We have also seen for ourselves already the felling and trashing of immature trees not ripe for logging and therefore would like to ask the question **why** immature trees have been felled and trashed by NRW as part of their normal management programme?

We wonder - Is it that the income for NRW is sufficient to compensate commercially for the loss of young trees....

Application of Holford Rules:

At the Open Floor Hearing on Tuesday evening we were directed by the QC to their Document 8/4 (Lifetime Costs Report). This was in response to Mr Robert Jones' contention on the Monday evening before, that Holford Rule 7 had not been fully observed by the applicant.

This was raised again by Grwp Blaengwen at the Issue Specific hearing and I quoted Holford Rule 7:

"Approach urban areas through industrial zones where they exist and where pleasant residential and recreational land intervenes between the approach line and substation, go carefully into the costs of undergrounding, for lines other than those of the highest voltage".

I pointed out that although we might not have formally designated SLAs etc to the North of the Towy, the description 'pleasant residential and recreational land' most certainly applied.

We believe that this rule was intended to evaluate the differential costs of OHL and UG systems on the public purse, rather than the profit and loss assessment of a project, for the benefit of a public ltd liability company who would no doubt have made their assessments before entering the market in the first instance. The points we now make are:

1) Nowhere in Doc 8.4 does it indicate how the losses accruing from the clear felling of large tracts of forestry land in order to cater for OHL are accounted for both in the construction and during the lifetime of that line and maintaining it as a clear felled area. *(This was raised by Mr Robert Jones at the Issue Specific Hearing – under Costs)*

2) There has been no accounting of the costs that will be incurred in rentals, surface damages etc, to landowners, and payment to contractors for removal/pruning of trees etc that become obstructive due to natural growth. *(This was raised by Mr Robert Jones at the Issue Specific Hearing – under Costs)*

3) Where are the costs to businesses from the traffic delays and disruption along the A485 accounted for?

4) Good engineering design requires that any project should be tailored to its particular situation. We asked the following at the Issue Specific Inquiry: *The applicant has based their estimates on averages taken over the whole of the southwest. This particular proposal is over land often exposed to heavy snow, blizzards and gales - the sort of weather that has been known to cause severe outages due to collapsed lines. Such conditions have caused exceptionally heavy operational costs to restore supplies in the fairly recent past. Not to mention that in some cases several weeks without supplies of power for many. We were told that the calculations are detailed in the LCR.*

Undergrounding:

We don't believe that UG has been properly presented as an option during the consultation process. WPD staff emphasised at public consultations that UG was more costly to install and that underground fault-finding and repairs tend to be more expensive and we readily accept that. However, they also admitted that there was less likelihood of faults with underground cables, they were less subject to storm-damage etc and require less maintenance, so long-term are potentially more cost-effective – and of course, from our point of view, UG once completed, is less obtrusive, detrimental and hazardous than OH cabling.

However, we were also told most emphatically, that their client RWE would never agree to it, it being cost-prohibitive to them as a company – we guess end-profits being the key factor in their decisions – which brings us back to Holford Rule 7 again.

The Lifetime Costs report was produced because WPD was challenged to produce figures that would provide a fairer, more complete cost comparison than the one presented to the public at the consultation meetings and we believe that the Inspector has asked for even more in-depth cost analysis from WPD for which we thank you.

However, whatever the cost comparison, it must still be taken into consideration that the overall and overwhelming response from members of the public, our County Council Members and our politicians is for undergrounding, yet WPD's proposal is still for nearly 90% of the connection to be overhead. Surely it is wrong to decide this on cost alone?

County Cllr Linda Evans' Oral representation at the Open Floor Hearing on Tuesday evening mentioned that the entire onshore length (47km) of the Dudgeon Offshore Wind-farm grid connection in Norfolk was being laid underground.

Obviously the cost of an UG connection was not considered prohibitive, so there can be cases where there is justification for a whole route to be undergrounded.

It appears that the Councils in the area actively negotiated with the wind farm company – perhaps CCC should have been more pro-active. But their inadequacies in, or unfamiliarity with, the process should not deny the local community the right to be properly considered and protected.

Interestingly (when we note that WPD's QC's response at the Open Floor Hearing was that the Council went against its own officers' recommendations), the Council in Norfolk also went against its officers' recommendations and the Council's stance was subsequently upheld at the public inquiry.

In this transcript of our Representation we are providing some links, telling of the Norfolk story, for comparison with this Carmarthenshire Grid Connection.

http://www.edp24.co.uk/news/politics/positive_norfolk_meeting_over_pylons_1_1885448

<http://www.planningresource.co.uk/article/1121700/costs-threat-prompts-council-pull-wind-farm-cable-opposition>

http://www.eveningnews24.co.uk/news/politics/date_of_second_public_inquiry_into_plans_for_electricity_substation_in_little_dunham_near_swaffham_announced_1_1519192

http://www.eadt.co.uk/news/little_dunham_claims_victory_in_dispute_over_electricity_substation_plan_1_1979391

<http://www.bbc.co.uk/news/uk-england-norfolk-17314321>

<http://dudgeonoffshorewind.co.uk/construction/cablecorridor.php>

http://dudgeonoffshorewind.co.uk/news/news15_03_13.php

What Cllr Linda Evans said at the Open Floor Hearing very much reflected what had been said at the CCC Planning Committee held on 5 November 2015. The minutes were accepted as a correct record at Planning Committee 3rd Dec.

The minutes say that "In response to a concern, Members were assured that they could approve the content of the Local Impact Report (LIR) [written by officers as an assessment of the impacts] subject to what was included within the written submission [in which the Council's view could "be expressed"] without fear of contradiction."

It strikes us that Members were clearly concerned about the mismatch between their views and the line taken by officers, especially in light of the Council vote taken on 10th July 2013.

The Committee was advised that "if members were minded to put forward a different view to that outlined in the LIR... this [should] be placed in the 'written representation'."

This dichotomy was raised and discussed at various points during the Issue Specific Hearing, including the Agenda Item on SoCG where it was noted that the SoCG was agreed with officers only, on their technical expertise and NOT with elected Members. We can understand how this 'clouds the issue' of undergrounding more sections of the grid connection route. We side with Members on this issue. We also note that the Inspector has asked for examples of similar situations across Wales, that in his remit he has to give most weight to the LIR and that the Inspector will have the final decision.

<http://newsroom.carmarthenshire.gov.uk/news-archive/2015/11/brechfa-forest-grid-connection/#.Vl9KOW9OdhE>

Going back to the fact that WPD has cited the much greater cost of UG compared to OHL as the reason why the vast majority of the route should be OHL, we asked:

It is interesting to see how much less per kilometre the Norfolk undergrounding seems to be costing than the figure quoted by WPD. Admittedly, trenching in Norfolk's terrain might be easier and cheaper, but can WPD really justify the very much larger figure quoted for Carmarthenshire? And was it based on the estimation of costs across the whole length of the original route such as across ravines to Brechfa East before the BFE Wind-farm application was withdrawn which would have been higher - or on the easier terrain that the route now covers?

Has it been distorted by including the costs of tunnelling under the River Towy? Perhaps the cost per km of undergrounding elsewhere along the route is not nearly as much and should be recorded separately for clarity and transparency.

For a 132kv connection UG Carillion costs are quoted to be 47km costing £30m equating to £630,000 per km, whereas WPD is quoting £986,000 per km, a substantial difference which we would like explained.

Socio-economic Issues:

On socio-economic issues, in particular tourism and sustainable communities, Jillie Gardiner was representing other groups at this inquiry - we would like to reserve the right to support both her oral and written submissions regarding the effects of the grid connection on tourism and related local businesses and in particular how this and the related wind-farm developments seem to be in direct conflict with the community-led sustainable development aspirations and Policies of the Cambrian Mountain Initiative.

At the Inquiry WPD told us that they did consult with CCC on these issues but admitted that they had not consulted, for example, with individual B & B owners and that they had not undertaken an Economic Assessment because the 'project is so small' and the construction period very short so likely to have minimal effect.

This is extremely patronising to local businesses, particularly in the tourism and related businesses where people are very fearful of the impact on their income, both during construction and the long term effect of visitors not wanting to return to a 'spoiled' landscape – the pristine version a primary reason for coming here. Even a short-term reduction in income will have a high impact on the livelihoods of these small enterprises and we feel WPD have been insensitive in the extreme in their disregard of this issue.

At the Issue Specific Hearing WPD also told us that it had been hard to find another study that is applicable to this project – the 3 closest examples they used were not really close at all – yet they still used these to predict their conclusions.

Biodiversity:

Even up to the final phase of consultation we were only provided with a draft Environmental Statement – this has made it extremely difficult to fully quantify the adverse effects on this issue. Bearing in mind also that many local people do not have internet access, some not even a computer, and that those who are on-line may only have a Broadband width of 0.5, and that only intermittently, the Planning Inspectorate's aspiration of: "the focus of the PEI is to enable the local community to understand the environmental effects... so as to inform their responses regarding the proposed development." Is fundamentally undermined in this instance and has in no way been met.

So, as a community we find ourselves unable to give our final responses to biodiversity issues. We believe there should have been a further phase of public consultation with personnel available to explain and answer our queries on the plethora of bio-diversity issues that could well have an impact on us.

Construction and Cumulative Traffic Issues:

Grwp Blaengwen asked: *Carmarthenshire County Council does not have the resources, financial or personnel wise, or the capacity, to monitor and enforce all the conditions set for the grid connection build which will be happening within the same timescale as the Brechfa Forest West wind-farm and the cumulative work loading of other developments such as:*

- 1. Upgrade of A485 by CCC*
- 2. Abnormal loads and construction traffic also intending to use the same A485 route to reach development sites in the north of the county eg. consented 86.5m turbine at Pantycelyn, in-planning three turbines near Pencarreg, in-planning two 100m turbines on M Pencarreg.*

How has this been catered for in the Traffic Management Plan with particular regard to the A485 being the arterial route to Carmarthen from the north of the County (especially for the emergency services, ambulances to Glangwili Hospital A&E)?

We were told that WPD were aware of the main conflicts and had assessed the 'worst case scenario'. They had identified 31 locations where there was likely to be conflict but they have concluded that the Highway has sufficient capacity for this – no significant impacts have been identified. They will be working on the shoulder of the BFW development – working on the roadside as BFW development is 'gearing up'. Trenching will only be on half the carriageway and swept-path analyses have informed the draft TMP.

They did not completely cover our concerns.

We therefore implore the Inspector to insist that ring-fenced monies are set aside by RWE/WPD/whoever, for CCC to employ an independent agency to comprehensively monitor and rigorously enforce all conditions set, including the TMP.

Our fears in this quarter are based on reality – we repeat, the A485 is the main, in fact only, arterial route for the emergency services for the North of the County, in particular ambulances to the A&E at Glangwili Hospital, and for commuters into Carmarthen and beyond to the south and east of the County, or to Swansea and Cardiff etc.

We have past experience of:

- a Traffic Management Plan that was woefully insufficient, did not protect and wasn't enforced – congestion and chaos ensued between Swansea, along the A48 and A485 to the site entrance when published schedules were not adhered to re the Alltwalis build, exacerbated by mud on the roads, flooding and damage
- a Habitat Management Plan that was also not adhered to eg parcels of land with grazing limited to 8 head of cattle in the conditions, blatantly overgrazed by over 30 head of cattle – reported to CCC who were unable to react due to lack of officer capacity
- a considerable length of the Ancient Cistercian Way being dug up during construction – reported immediately to CCC who were unable to visit the site until it was too late – and then couldn't afford to take the perpetrator to court – this heritage was lost forever – a travesty!

We have many more stories like this – with photographic evidence – and we know you will say that they are irrelevant to this inquiry – but to us they are not – they are real fears – CCC is only going to be less able to monitor and enforce conditions as they face yet more 'efficiency savings' over the next few years.

This independent agency/officer is NOT the same as the Project Officer for which CCC is receiving payment of £104,920 to 'appoint'.

This appointment would be for the monitoring and enforcement of the DCO and all conditions set for the project, pre-, during and post-construction, to protect local people from the lack of current (and future) capacity of CCC to accomplish this, as has been evidenced in recent major developments.

Mr Broderick – I thank you on behalf of Grwp Blaengwen for your consideration of all these issues of concern for our members, and others in our local community, and for allowing us time at the Inquiry to make these representations. I have tried to steer clear of too much emotion and stick to the facts and genuine queries to which we require straightforward explanations and resolutions – but you will understand that it is a very emotive issue for all of us.

Grwp Blaengwen would like to endorse the comment made by Mrs Kilkelly in the concluding statements of the Issue Specific Hearing – that whilst there are 2 parties present (CCC [officers] and NRW) essentially in agreement with WPD, the Inspector should not forget that there is a third party involved – a whole group of landowners and local residents plus their elected representatives who are most definitely NOT in agreement with WPD! We were greatly heartened by the Inspector’s emphasis on the need for “equality of arms” and that, as the Examining Authority, he would make sure that third party concerns were properly addressed by WPD.

Lyn Morris for Grwp Blaengwen (12.12.2015)