

Pearl & Leslie Birch

Telephone: [REDACTED]

14th December 2015

FAO Ms Katherine King

The Planning Inspectorate,
3/18 Eagle Wing,
Temple Quay House,
2 The Square,
Bristol, BS1-6PN

Your Ref: EN020016
Our Ref: BFC_AFP035

Dear Ms King,

BRECHFA FOREST CONNECTION

We are grateful to the Examining Authority for a further opportunity to make a submission on this subject and, will be grateful if you would forward our correspondence to Mr Martin Broderick and ask if he would please formally include this letter in the procedure.

For the sake of simplicity, in this submission we have referred only to the Applicant as WPD and, in so doing include their entire extended team including Freedom and others, whose input we may make comment upon.

As we have limited means and the procedures are very technical, as evidenced by the impressive WPD team and the size of their written presentation, we can only make our submission in the passionate vernacular of ordinary landowners. We believe that in being custodians for the time being of this little piece of Welsh heaven, we have a duty to do our utmost to ensure that when it is time to pass on our bit of this remarkably beautiful landscape, it has been enhanced by our efforts for the benefit of the people of Wales and the worldwide visitors who presently flock here to enjoy the unique amenity.

We do not believe that WPD have made a case for this particular DCO and wish to bring the following points of rebuttal to the notice of the ExA in the hope that this will lead to consent of the DCO being refused.

We do of course fully understand that an electricity power transmission line is required to export the power from the consented wind-farm and is *necessary and in the public interest*, but as yet since a line-less connection is only a theoretical possibility, there is only a choice of two types of connection presently available. The method chosen by WPD and the subject of their DCO is not acceptable to us and therefore we wish to confirm our continuing objections to the proposed OHL.

Considering the weight of public opinion against this OHL proposal, as evidenced by our own unequivocal objections and those of other landowners demonstrated at WPD's own

public consultations; the same sentiments expressed in landowners own meetings that were reported in the local newspaper; those raised by our local MP, Jonathan Edwards in an Adjournment debate in Parliament on 19th November 2013; our local AM; and the Carmarthenshire County Council, we find that the statements made by various people at various times that “public opinion is a relevant factor for Government” to be of little comfort in the face of a determined large profitable organisation.

We have looked at the Electricity Act 1989 Section 37 and under *Environmental and Human Rights Aspects Q5/A5*, note that the phrase “*Experience has shown that only major network proposals give rise to significant representations with few if any being received for more routine works*”. In the circumstances, this advice would have forewarned WPD of the considerable adverse public reaction the would encounter to an OHL, being cognizant of the enormous local resistance to the Brechfa wind farms. Also, projects elsewhere in Wales indicate levels of public unacceptance:---

Powys and Shropshire with senior Welsh Minister Edwina Hart advocating underground cables and, Montgomeryshire MP Glyn Davies being scathing in an Adjournment debate in Westminster Hall (Shropshire Star 12 Dec 2015)

Conwy and Denbighshire by the Conwy Council decrying OHL's with phrases “*this will have a catastrophic effect on the rural environment*”, “*it is a matter of long term importance*”, and “*this is nothing less than the exploitation of the natural beauty of Welsh countryside.*” (Daily Post 23rd October 2014)

Snowdonia and elsewhere with National Grid to spend £500m *reducing visual impact* resulting from their attention to the public dislike of pylons. The wires will be put underground – *at higher cost, but lower visual impact*. Countryside groups welcomed the move – but stressed that all new power projects must consider the *impact on the landscape* from the outset.

Hirwaun Power Project where developer elected to underground cables, but WPD elected to ignore this weight of emerging public opinion rather than choose the alternative type of connection thereby providing a much speedier, simpler and supply secure solution, acceptable to MP's, AM's, CCC, AP's, IP'S and the wider community.

As WPD do not appear to have carried out an analysis amounting to 100 or so file folders for the alternative to an OHL for comparison purposes, it is assumed that headline costings were the initial criteria.

If we may we would like to look into some of the reasons WPD have put forward to justify their application for a DCO for an OHL.

WPD have stated that undergrounding *would result in an increase in electricity charges to consumers*. We are of course very concerned about such a financial imposition and, so as to understand the magnitude of this we have done a simple calculation. Assuming that if all the application, legal and other necessities were the same for both transmission solutions, the only variable would be the cost per kilometre (£/km) :---

OHL

Cost (25.2km @ £150,000/km) + (3.4km @ £986,000/km) £ 7,132,000

UNDERGROUND

Cost (28.6km @ £986,000/km) £28,200,000

RESULT

Extra cost for underground £21,068,000

Number of WPD customers as per their website 7,800,000

Cost increase to one customer for ONE YEAR = £2.70 (5.2p per week)

Should a more straight route be employed, such as the one shown as the *Green Route* in

the WPD four page *Report into Undergrounding Cable Costs, June 2013 (compiled by Balfour Beatty Utility Solutions Ltd)*, employing the estimated cost as £950,340/km with an estimated reduction in length of 4.5 kilometres, then:-

OHL (as above)

Cost (25.2km @ £150,000/km) + (3.4km @ £986,000/km) £ 7,132,000

REVISED UNDERGROUND

Cost (28.6 less 4.5km) = 24.1km @ £950,340/km £22,903,194

RESULT

Extra cost for underground £15,771,194

Number of WPD customers as per their website 7,800,000

Cost increase to one customer for ONE YEAR = £2.02 (3.9p per week)

WPD have given the impression that significant price increases would be visited upon energy users by giving reasons such as *if forced underground prices go up* and we cannot refute the accuracy of these statements, but based upon the admittedly simplistic calculations shown above, WPD are significantly overstating the case against underground cable and, if WPD so elect to pass on the entire extra cost to their customers, so ignoring the questions posed by MP's on the 'Energy Select Committee' regarding adequate investment in their networks, the cost to the customer as shown is hardly significant when set amongst other reasons for price increases.

We understand that WPD made statements regarding wooden poles to the effect that *OHL is not incongruous or inconsistent in countryside and commonly seen in areas of countryside*, which we cannot accept as a reason to add to the already remarkably large number already blighting the countryside of Wales. We do not agree with the argument that more wooden poles should be the default solution and perpetuated when the countryside is being encroached upon by urbanisation. In a world that seems to be increasing in speed every day, the ordinary person is in desperate need of rest and relaxation to relieve the stresses of everyday life and, where better than the sun, scenery, sea and sand in Wales?

Following on from the previous paragraph, WPD have determined that the installation of an OHL would have *limited effect on tourism*. Remarkably WPD do not appear to offer any actual before/after studies relating to a similar completed project from independent sources and it is understood that an internet search was the only facility being used to obtain data, rather than tourism industry reports or analyses. The conclusion put forward by WPD comes at a time when this particular industry in Wales has serious competition from the emergence of cruising, all-in worldwide holidays, cheap air holidays, continental holidays facilitated by the Channel tunnel and, cut price holidays to Greece and Spain who are trying to energise the recovery of their own holiday industry. Entrepreneurs in Wales are fighting back with investments in adventure holidays such as off-road biking, canoeing, coastering and an inland surfing lagoon, but these enterprises need the support of everyone to protect the natural environment to prosper and provide for the future and, this does not exclude the electrical transmission industry. It was probably said by an expert in the recent past, that out-of-town supermarkets would have a *limited effect* on High Street shops, but as we are all aware towns and cities are investing serious sums of money to try and re-energise High Streets. It is of no use waiting until the Welsh tourist industry suffers a similar fate; like climate change, action needs to be taken now to preserve and build on what we already have before its too late.

It is disappointing that WPD seemed to offer a very narrow perception of tourism based only around *public rights of way and footpaths* and, catering for construction vehicles and

equipment with signage to inform drivers of vehicles of the fact the ways may be in use.

WPD have stated that *the Local Authority believe there will be no tangible effect on business*. In fact, areas of Carmarthen are in need of some regeneration presently, possibly as a result of the supermarket effect, but there is anecdotal evidence even now from businesses providing tourist accommodation that the impact of 'green' technologies and their associated infrastructure is effecting how and where tourists wish to spend their play-time. We understand that no contact has been made with any business owner along the proposed route of the OHL to ascertain if there are any effects on their present activities caused by nearby infrastructure encumbrances (e.g. turbines, LV cables) and, this is also the case regarding concerns they may have about their enterprise when the proposed OHL and turbines are installed.

It has been stated by WPD that *private losses are minor compared with other needs and the consequences for the country*. One would expect a large profitable organisation not to make such a statement when it is in their power to mitigate those *private losses* by spending a bit of money. Remarkably, we doubt if WPD would consider a loss of profit of the same percentage magnitude as that of a small business or landowner to be *minor* in their scheme of things.

Both in their literature and to the ExA, WPD have referred to their statutory duty under the Electricity Act (1989) to *develop and maintain an efficient, coordinated and economical electricity network*. We do not understand how an OHL with its cables needing to be inclined in places onto, or from, the pole insulator, sagging between the insulators and arching over the insulator to the next cable is *efficient*, as the increased cable length surely makes the connection longer with the associated transmission losses. Also, the increased length of cable will have enhanced magnetic effects that could be a danger to the public and it is understood that the SAGE report advises that precautionary measures be taken. It would appear that underground cables would be shorter and more direct, especially with the foreshortened route (Report into Underground Cable Costs, June 2013, page 8).

It has been noticed in some documents that land over which the OHL are to be installed is described in various ways, but remarkably we have not yet met a single landowner who is affected by this project, that has been consulted about their land, soil characteristics or other features of their property by the compilers of this significantly large amount of data. Some landowners have worked their land for more than 30 years and a great deal of knowledge could have been obtained from this practical experience.

WPD have confirmed that with the use of computer modelling (swept path analysis??) the effects of increased construction traffic flow will have *minimal or no significant impact* as the technique apparently indicates that should roadworks take up half a carriageway construction vehicles can pass or turn as required. Recently we have regrettably experienced the affects of two fatal road traffic incidents and several minor roadworks. As the A485 is the main road for emergency vehicles, bus services, large stock transporters, farm machinery, holiday-caravanners and not forgetting the local residents. The effect of any hold up has been proven to be more than a little significant, as diversions are necessarily along lanes not constructed for large vehicles leading to journey times being extremely long in both distance and time. The Police may have reports detailing such incidents.

We understand that WPD have implied that *the position is on/off as far as elected members are concerned and they want the whole thing underground*, and also stated that

it would make a very poor president nationally if entire underground was sought here. We would suggest that the president being attempted here is for a powerful organisation to disregard the policy adopted unanimously by CCC who are elected to represent about 200,000 people. At this point we wish to highlight the reply made to WPD's statement about their DCO application that every single entity that's ever looked at this has come to the same conclusion, which was provided by Mrs Kilkenny, there is a third party involved, so not every entity (thing that has real existence, Oxford) is agreeing with this process (group of landowners). Similarly, CCC shown above is another entity that does not agree.

WPD raised the point about EN-5 paragraph 2.8.8 and the second sentence has particular relevance to our objections for an OHL. Also, footnote 13 appeared to be a very significant point put forward and, if we highlight the phrases “..but they may form part of a scheme...” and “..may feature as a means of mitigating some adverse impacts..”, we do not perceive these to be inconsistent with an OHL scheme, but as a point of fact, footnote 13 does not imply that an OHL scheme is the only type of scheme that could be employed especially if the desire is to mitigate all of the adverse impacts of a connection. Picking up on another point made by WPD regarding their application being a *carefully planned enterprise with an end*, we cannot perceive that an alternative to an OHL project should be any the less carefully planned.

Like other landowners, we cannot accept the *Heads of Terms* in their current state as they appear to be simply a unilateral statement of WPD's wants underpinned by the threat of a CPO. A document such as this should be negotiated with (and unique to) each landowner and should include a schedule showing a definitive list of what equipment it is planned to install on the land to be subject of the proposed easement, together with a plan showing the precise location of each item of equipment with dimensions from a fixed point and, a schedule of works that WPD propose to carry out. These documents will enable the landowner to assimilate the effects of the works if they are carried out and, potentially reveal any adverse views as a result of tree cutting etc., or other problems that may be encountered. The document should also detail a realistic payment for the entire 25 year life of the project for loss of land utilisation that may effect a landowners Rights to *Single Farm Payments etc*, special attention to be administered to the land not accessible with machines requiring hand tools and herbicides and, for loss of future income from the introduction of bio energy crops that may be grown for the countries future electricity needs. Like everything else HOT's should evolve to meet collaborative needs.

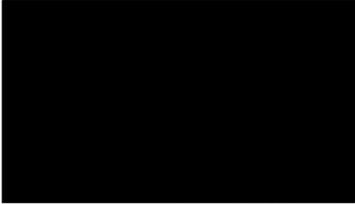
To conclude, this is a list (not exhaustive) of the shortcomings of an OHL:---

- subject to weather damage (storms, lightning, fallen trees, freezing)
- subject to collision damage (light aircraft, farm machinery)
- large electro-magnetic fields (peoples health and cancer)
- wide strip of land to install (repair and maintain)
- hazard to low flying helicopters hereabouts (air/sea rescue, military)
- susceptible to thefts, illegal connects and sabotage
- danger to birds (who apparent see with UV light)
- increasing the already significant quantity of wooden utility poles
- more transmission losses from essentially longer cable
- many threats to security of supply
- risk of personal hazards, falling components, cables, icicles
- require the destruction of mature trees some hundreds of years old
- destruction of habitat for up to 300 species if an Oak tree felled
- poles & cables have a cumulative visual impact, see one you see more
- environment blighted by visual impact, lowering amenity value

require trees nearby to be regularly pruned, gaps in natural landscape
farm machinery requires to give wide berth wasting crop area
extra wide implements, larger berth as extreme end maybe obscured
hand tools and herbicides required for non machined areas
less land use may mean less single farm payments, etc
less land for new crops for possible bio energy developments

We are sorry to labour the point once more, but had the decision been made to install the connection underground non of the above would apply and, savings in administration expenses may have been achieved.

Kindest Regards,



Leslie & Pearl Birch