

EIA	Environment Impact Assessment (EIA)	
EIA2-12	Applicant , RWE and Carmarthenshire Local Access Forum	<p>In your representation [REP3-029] you state that:</p> <p><i>Last week during the hearings the legal representatives of WPD said that the reason for not mitigating the impact of the power line on users of Brechfa forest by relocating the substation, was that the site of the substation formed part of the development consent order for the wind farm and therefore could not be changed. However, the wind farm developers have recently submitted an application to modify the development consent order for the wind farm which includes making extensive changes including changing the routes of power lines and access tracks between turbines. So the question remains as to why the impact of the power line cannot be mitigated by constructing the substation to connect to the wind farm at a location to minimise the length of power line needed.</i></p> <p>Can the Applicant and RWE respond to the above statement?</p>
		<p>This answer has been jointly prepared by the Applicant and RWE Innogy UK (RWE) and is on behalf of both organisations.</p> <p>The Applicant maintains its position that the location of the Brechfa Forest West Wind Farm substation is not an issue for the examination. The location of the substation was consented by the Secretary of State when approving the wind farm. WPD is required by the OFGEM Guaranteed Standards of Performance to construct the new 132kV circuit to the point of connection requested by the party applying for the connection, in this case RWE, and as such it is not in the power of WPD to relocate the substation.</p>

		<p>RWE is currently applying for a non-material change under paragraph 2 of schedule 6 to the Planning Act 2008. RWE wishes to point out that the changes proposed are not 'extensive' as suggested in the representation. The proposals relate to the consented access tracks, with some associated alterations to the routes of inter-array cabling, and are designed to minimise construction impacts by reducing track lengths; reducing cut and fill; improving access for vehicles; and facilitating the safer movement of turbines during delivery. The RWE proposals do not impact on the alignment of the grid connection circuit.</p> <p>The Applicant and RWE agree that the substation is appropriately located for the consented wind farm and that a fundamental relocation of the substation would give rise to significant engineering redesign. The scale of this change may be considered to be 'material' as described in the DCLG Guidance Note 'Planning Act 2008: guidance on changes to Development Consent Orders' (DCLG, December 2015), whereas those included in the current non-material amendment application are extremely minor in nature.</p>
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