

Gofynner am / Please ask for: **Richard Jones**

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Dyddiad / Date: **29th January 2016**

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

Dear Mr. Broderick

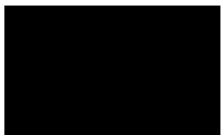
Planning Act 2008 (as amended) and The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended)

Application by Western Power Distribution (South Wales) plc for an Order Granting Development Consent for the Brechfa Forest Connection

Please find attached the Council's written responses in relation to the Examining Authority's 2nd round of questions, issued on 11th January 2016.

We hope the above information is of assistance, but should you require further information please do not hesitate to contact the above named officer.

Yours sincerely



Llinos Quelch
Head of Planning

Brechfa Forest Connection (EN020016)

Carmarthenshire County Council's Response to the Examining Authority's Second Round of Written Questions

The Council's answers are based on the technical assessment of the evidence presented in WPD's submission documents. This document does not contain the views of the Council's elected members, as these have been placed within the Council's Written Representation.

Schedule 3 – Requirements

DCO2-07 Requirement 4 [REP3-048] –Do Carmarthenshire County Council (CCC) have any comments on the wording?

- *Why is the relevant highway authority not to be notified under paragraph (2) even though it needs to be consulted under paragraph (1)?;***
- *Does the Applicant have any consequential amendments to insert into Article 2(1) e.g. definitions of “relevant highway authority” and “business day”?***

CCC Response:

The Council considers that the 'relevant highway authority' should also be notified and therefore be included within paragraph (2). This will ensure consistency with paragraph (1). The Council would also agree that the definitions of "relevant highway authority" and "business day" need to be inserted into Article 2(1).

The Council has been notified by WPD that it intends to amend the DCO accordingly.

DCO2-12 Restrictions of working width in the bog habitats

The ExA notes there is no reference to restrictions to the working width in the bog habitats in the Applicant's notes of the DCO hearings. At Deadline 2, the Applicant stated in response to the ExA's question EIA15 the following [REP2-033]:

'The works will be restricted as noted in the ES Chapter 10 [APP-065] including restricted access routes over protective trackways to access poles in the vicinity of the bog and the pingos, as shown on Figure 4 of the CEMP (APP-127). The restrictions will be achieved via an additional DCO requirement which shall be included within the next issue of the draft DCO.'

The draft DCO submitted for Deadline 3 [REP3-048 and REP3-049] did not include a specific requirement in relation to restrictions in the bog habitat.

The ExA wishes to clarify with the Applicant whether or not such a requirement will be included in the next draft DCO and what are the views of CCC and NRW in this regard?

CCC Response:

The Council supports an amendment to Requirement 5 to restrict explicitly the ability to deviate access routes in the vicinity of the bog and pingos.

The Council considers that working widths and full protection measures can be specified at detailed design stage and approved via the discharge of the HMP and CEMP Requirements.

DCO2-13 Do CCC believe the revised Habitat Management Plan (HMP) [REP3-039] addresses their concerns in respect to the wording of the method statement for hedgerow translocation?

CCC Response:

CCC considers the outline hedgerow translocation methodology specified in requirement 15 - HMP, (section 1.5.2) and requirement 21 - CEMP, (section 5.1.7) is satisfactory for the purposes of granting permission. However both documents are outline in nature, detailed documents will require submission to and approval by CCC, to discharge the aforementioned requirements. CCC considers that additional details including full location plans, timings and detailed method statements can be specified at detailed design stage and approved via the discharge of requirements 15 and 21.

DCO2-14 Do CCC, NRW and IPs have any comments on the revised HMP [REP3-039]?

CCC Response:

CCC considers the outline HMP is satisfactory for the purposes of granting permission. However the document is outline in nature, a detailed document will require submission to and approval by CCC, to discharge requirement 15 prior to the commencement of works. CCC considers that additional details such as detailed planting design, identifying areas targeted for habitat and feature creation, a detailed programme of monitoring and aftercare can be specified at detailed design stage and approved via the discharge of requirements 15.

DCO2-15 Can the Applicant clarify whether the HMP [REP3-039] remains as an annex to the CEMP or whether it will be an entirely standalone document,

as suggested at the environmental matters hearing on 8 December 2015 [REP3-043]?

Are NRW and CCC content with the HMP [REP3-039]?

CCC Response:

The Council would favour that the HMP and CEMP are separate standalone documents.

The Council considers the outline HMP is satisfactory for the purposes of granting permission. However the document is outline in nature, a detailed document will require submission to and approval by CCC, to discharge requirement 15. CCC considers that additional details such as detailed planting design, identifying areas targeted for habitat and feature creation, a detailed programme of monitoring and aftercare can be specified at detailed design stage and approved via the discharge of requirements 15.

DCO2-17 Article 34 details the plans which will be subject to certification by the Secretary of State. Requirements 15, 21 and 24 refer to “outline” plans. This should be reflected in Article 34. Can the Applicant also amend Article 2(1) definitions to reflect the differences between “outline” and “detailed” plans.

CCC Response:

The Council considers that a distinction needs to be made between “outline” and “detailed” plans in the DCO and supports the ExA’s request to amend Article 34 and Article 2(1).

EIA2-11 Brechfa Forest and Llanllwni Mountain Cluster Group and CCC)

In your representation [REP3-025] you state:

Carmarthenshire County Council tourism department reports that the current value to the local economy of Brechfa Forest as a tourist attraction is £18 million per year.

Does CCC concur with the above assessment? If so what would be your estimate of the impact on Brechfa Forest as a tourist attraction from this application?

CCC Response:

The Council is not aware of any published or publicly available report it has produced which makes reference to the current value to the local economy of Brechfa Forest as a tourist attraction.

The Council's is currently considering area based valuations of tourism, however, this information is currently not available for the Brechfa Forest area.

HA2-05 The Water Management Plan ([APP-127] Annex 3) does not outline what actions would be taken should the water sampling indicate that the water quality has declined as a result of the construction of the development to ensure no effects on the water environment or European Sites occur.

The ExA would like to clarify with the Applicant what measures would be employed, and whether they will seek agreement on any such measures with CCC and NRW?

CCC Response:

The Council's remit is restricted to flood risk management and the issuing of land drainage consent in relation to non-main rivers. Water quality and pollution matters are assessed and regulated by NRW. The Council therefore defers this question to NRW. The Council will discharge the details on the Water Management Plan in consultation with NRW.

HA2-07 Does CCC have any comments to make on the Applicant's revised NSER dated December 2015 [REP3-037]; do you agree with the conclusions of the revised NSER?

CCC Response:

As stated in the SOCG, NRW is the most appropriate body to consider the adequacy of the NSER. The Council has no further comments to make.