

██████████
██████████████████
██████████████
██████████

Mr Martin Broderick
The Planning Inspectorate
3/18 Eagle Wing
2 The Square
BRISTOL
BS1 6PN

29th March 2016

Your Reference: ENO20016
Our Reference: BFC-AFP033

Dear Mr Broderick

Brechfa Forest Connection

At the close of this examination we would like to provide you with a final summary of our position.

Firstly, we would like to thank you and your staff, especially Katherine, for the assistance provided in navigating through this process. We would like to thank you for the patience and consideration you afforded to myself and fellow Land Owners at the various Hearings and for re-framing our genuine issues and concerns, which we often expressed in a muddled and emotional way, into pertinent questions for the Applicant.

From our experience over the past six months the PINs process offers the framework for a fair and transparent examination of Projects. We would however like to put on record that from our experience we consider the approach to PINs by WPD regarding this Project falls short of what is required. We have come to understand that PINs is built on consultation, transparency, reasonableness and gaining co-operation. We have evidenced to you that we have been prepared from the start of the consultation process to engage and to be reasonable. WPD had our full co-operation at Stage 3 Consultation.

We would also like to put on record the disgraceful lack of attention to detail to matters of communication and administration by WPD and their consultants throughout this process. This is a multi-million pound project being examined within a legal framework and the repercussions of the decision made will have a lasting affect for us. Where files have been submitted to the Examining Authority as evidence they should be correct, save for a reasonable occurrence of human error. Poor communication regarding survey visits which have caused upset and inconvenience has shown a lack of respect for our time and feelings.

Our own experience of this shortcoming includes;

- Survey teams arriving without appointments
- Survey teams accessing our land without permission
- Survey teams missing pre-arranged appointments
- Getting us mixed up with other Land Owners when attempting to arrange surveys
- Incomplete and inaccurate information recorded in submitted Land Owner Engagement records
- Incomplete and inaccurate information recorded in submitted Master Land Owner Communication records
- Incomplete information recorded in submitted register of Correspondence between us and the Applicant
- Incorrect consultation comments attributed to us
- Incorrect version of HoTs document provided for us on 11th March 2016, attributed to a version control issue
- Letters we submitted requesting engagement and information remaining unanswered for months
- Responses containing false and inaccurate information to our letters
- Lack of evidence that all elements of SoCC have been undertaken, with regard to invitation for a site tour to our Elected Representatives
- Verbal undertakings broken

In past careers my husband was a Senior Executive with a multi-national company and I was a Director of an SME and neither of us have previously encountered such a lack of professionalism.

We have spent many hours considering how this process has failed us and why we are in this situation at this stage. We have concluded that the failure is due to WPD's attitude to the consultation process, their lack of engagement to negotiate to reach voluntary agreement and the 'closing of the door' to any engagement with us after the end of Stage 3 Consultation, and it is at this point that we feel the process broke down. After Stage 3 Consultation the opportunity to share their final design with Land Owners, which took into account all the views gathered at that point should have been taken prior to the design being submitted for examination.

The issues that we and many Land Owners have with the submitted design are not unreasonable and could have been addressed prior to submission and gaining our co-operation. Our issues are due to changes in what was agreed with WPD in principal during consultation: change from single to twin poles; pole locations being moved; not using the existing mature tree lines as visual protection; trees being identified as affected (one of our mature oaks which had been identified by survey as visually important and to be avoided), and a boundary tree line identified as affected. From our conversations with other Land Owners at the Hearings and at Land Owner meetings and from Land Owner submissions on the PINs website our experience is widely shared.

From our first engagement with WPD we high-lighted that the visual impact was our greatest concern and sought further engagement. The modifications we suggested with our neighbours to WPD at the meeting on 4th March 2016 are not unreasonable. However, WPD expressed at the meeting that they are resistant to working outside the 25 meter development corridor they have submitted. To date we have not received a response following the meeting. We and our neighbours easily agreed on two alternatives. We have requested that WPD let us work with them to explore the possibilities of our suggestions. In addition to moving the unsightly H turning pole from The Davies immediate view, our suggestions would also provide the benefit of saving the boundary tree line between our two properties, saving a number of trees which would act as a visual screen for The Davies and save our mature oak. As we have previously evidenced, WPD have suggested in their consultation reports that when formulating their submitted design over our properties they had to choose one neighbour's wishes over the other and that the decision would have been judged by the Inspector and ultimately the Secretary of State. Time should have been taken to consult with us both on the design prior to submission as our aims are fully aligned, to reduce the visual impact and we had no difficulty in agreeing a mutually acceptable option. We are of the opinion that WPD designed the line to suit their own purposes and manipulated our consultation to justify their decision.

We don't think that it is unreasonable that the design of the line is as acceptable to us as it can be. This is being imposed on us. We thought we had negotiated a mutually acceptable design at Stage 3 consultation and were fully prepared to enter into an agreement with WPD. Had the design which we had agreed in principal been presented to us with the Heads of Terms in September 2015 we would not now be asking WPD to consider any modifications, our Stage 3 Consultation submission evidences this.

Since the close of Stage 3 Consultation we have felt that there has been an assumption on the part of WPD and their consultants that approval of their application is a 'fait accompli'. We have felt that WPD consider that the 'consultation box' had been ticked at the closure of Stage 3 Consultation and they had no obligation to engage further with Land Owners. At a meeting with WPD's newly appointed consultants, Bruton Knowles, they advised us that Compulsory Acquisition was granted as a matter of course for this type of Project. This attitude is further illustrated by the Project Status statement on RWE, the Brechfa Forest West Wind Farm developers web-site -

"The Brechfa Forest West Wind Farm will be connected to the electricity network by the Brechfa Forest Connection. **Following confirmation from Western Power Distribution that this Connection will be available in late 2017**, RWE Innogy UK will commence construction of the wind farm in autumn 2016 to coincide with the new grid connection timeframe"

Link to RWE website -

<http://www.rwe.com/web/cms/en/512366/rwe-innogy/sites/wind-onshore/united-kingdom/in-development/brechfa-forest-west-wind-farm/>

Our understanding is that the application is still under examination however WPD have already provided confirmation to the wind farm developer that the connection will be available in late 2017. We feel that this assumption on behalf of WPD lies at the heart of the breakdown of this PINs process with Land Owners.

We don't know where the process will take us now but we haven't given up hope that WPD will work with us to achieve a voluntary agreement.

Yours sincerley
Diana & Kevin Reader