

**LLANSANTFFRAID AND DEYTHEUR COMMUNITY COUNCIL
CYNGOR CYMUNED
LLANSANFFRAID & DEUDDWR**

July 25th 2016

Energy Infrastructure Planning Team (e-mail to deccnic@decc.gsi.gov.uk)

Department of Energy and Climate Change (DECC now merged into BEIS)
Area C 4th Floor, 3 Whitehall Place, London SW1 2AW

**ELECTRICITY ACT 1989 & TOWN AND COUNTRY PLANNING ACT 1990
THE ELECTRICITY GENERATING STATIONS AND OVERHEAD LINES
(INQUIRIES PROCEDURE) (ENGLAND AND WALES) RULES 2007**

**RE-DETERMINATION OF THE APPLICATION BY RES UK & IRELAND LIMITED
("RES") DATED 27 MARCH 2009 FOR CONSENT TO CONSTRUCT AND
OPERATE A 100 MW WIND TURBINE GENERATING STATION IN POWYS, MID-
WALES ("LLANBRYNMAIR")**

**RE-DETERMINATION OF THE APPLICATION BY RWE NPOWER RENEWABLES
LIMITED ("RWE") DATED 11 DECEMBER 2008 FOR CONSENT TO CONSTRUCT
AND OPERATE A 130-250MW WIND TURBINE GENERATING STATION IN
POWYS, MID-WALES ("CARNEDD WEN")**

Dear Sirs,

I am responding to the letter dated 6th July 2016, signed by Giles Scott, Head of National Infrastructure Consents and Coal Liabilities at DECC (now merged into the Department of Business, Energy and Industrial Strategy - BEIS) to this Community Council (the letter). We were invited as an interested party, to make representations on the two re-determinations ("Llanbrynmair" and "Carnedd Wen") which the Secretary of State (now, we understand, the SoS in BEIS) will make following legal challenges to the decision of the DECC SoS to refuse both these applications for planning consent. **This response refers to both applications and especially to their cumulative impact.**

1.0 Introduction and Background

1.1 Members of Llansantffraid and Deytheur Community Council are elected by the largest village community in the Vyrnwy valley with a population of c. 2,000 which rises to c. 4,000 in the summer tourism months. We took part in and made written submissions to the Mid Wales Conjoined Wind Farm Public Inquiry (the Inquiry) which was held from June 2013 to May 2014. With other local Community Councils, we also supported two umbrella groups, the Alliance and MAP, which participated in the Inquiry. Our community is strongly opposed to the wind farms and their associated infrastructure - see 1.8 below. So we welcomed the refusals of four out of five projects by the SoS, were disappointed when the decisions were challenged and quashed and hope that they will be reinstated as soon as possible.

1.2 Our reasons for opposition to the proposed developments are that they would cumulatively have a negative impact on our local economy and environment. The main damage would come from what the Inspector at the Inquiry described as "the necessary grid infrastructure", i.e. the controversial "Mid Wales Connection" (MWC) proposed by National Grid plc (NG) to serve the wind farms. The MWC would be, effectively, a 42 km energy super-highway of 400 kV power lines mostly on overhead 50 metre high pylons, through the heart of rural Montgomeryshire and Shropshire to connect with the national electricity grid in England. The likely cost of the MWC has not been clarified by NG although we have estimates of £400-500 million, the cost of which would ultimately be met by electricity bill-payers.

1.3 The MWC, according to NG's latest plans, would export the electricity from the proposed wind turbines via a substation at Cefn Coch and a short 13 km underground section at Meifod on 400 kV overhead cables supported on pylons. The power line would pass directly through our village, crossing the Vyrnwy at Llansantffraid 12 times in 3 miles, ruining the river landscape and seriously damaging our local businesses, property values, ecology, environment and the settings of a built heritage of over 50 listed buildings and a Scheduled Ancient Monument. Llansantffraid has five privately owned and managed tourism parks along the river valley with over 850 holiday homes, mostly belonging to English families. These, with agriculture, are the basis of our local economy and would be blighted by the MWC.

1.4 The Inspector in April 2013 refused our request that the Inquiry should be adjourned until National Grid plc had completed their environmental studies and made final proposals. Our request had been submitted ten weeks earlier through the Alliance, which represented the collective view of many local interested parties including Llansantffraid and several other Community Councils. The Inquiry, we said, could then assess not only the wind farms but also the "necessary infrastructure". The turbines and the power line were, we contended, the two interdependent parts of what is actually a single project. Powys County Council made a similar request but the Inspector also rejected that demand, saying that to wait for the environmental information relating to the proposed MWC would "cause unnecessary and unjustified delay". Powys County Council also recommended that the Inquiry took a more strategic approach and included the MWC so that the outcome of the Inquiry would be more coherent and less challengeable. The Inspector again refused.

1.5 Among reasons for refusal given by the Inspector were that "a large part of the new infrastructure would also serve the area in general..." and that "the construction of new high voltage distribution lines is also vital to providing a stronger more reliable network for electricity users (in Mid Wales)". Both these reasons are, in fact, baseless. The MWC, as NG has confirmed to us many times, is "all about connecting proposed wind farms in Powys to the national electricity network in Shropshire" (see NG web site). NG has never claimed that it would serve any other purpose and it appears that the Inspector has failed to understand the difference between electricity "transmission" and "distribution". There would be no user connections and no power distribution from the MWC transmission line between the Cefn Coch substation (the hub) and the main grid connection in Shropshire. All electricity generated by the wind farms would be for export only.

1.6 In September 2015, after the refusal by the SoS of four of the five wind power projects considered by the Inquiry, NG suspended their work on the proposed MWC power line. If the MWC had genuinely been a separate project, as the developers argued and the Inspector agreed, this would not have been necessary.

1.7 Because of the decision to exclude the MWC from the Inquiry, thus favouring the developers over the affected communities, the Inquiry failed to address our legitimate concerns over cumulative impact. Moreover, because the Inquiry took this approach, it was not able to address the key questions of which combinations of wind farms approved (if any) would trigger the need for the MWC grid connection. This has led to uncertainty among local people. We have tried to resolve this issue both directly and through our elected political representatives, including our MP, with NG and the UK Government agencies concerned, but so far without success.

1.8 Our representations set out below derive from close community consultation during the last five years. They truly reflect the views of Llansantffraid people. In October 2012 we carried out an externally monitored and validated 1,000 household survey of Llansantffraid electors to gain an objective view of people's opinions. Over 55% of electors took part. We found that 82% were opposed to the wind farm developments and 100% were opposed to the power line and pylons. This information was submitted to the Inquiry but evidently failed to impress the Inspector. Other local Community Councils that would be affected by the controversial MWC carried out similar surveys with similar results.

1.9 We, therefore, welcomed the decision by the SoS to reject the Inspector's recommendations and refuse four of the five applications. Equally, we were disappointed that the decisions in these two cases were later quashed (on legal grounds that are not clear to us). Our hope is that the SoS will now re-affirm the original decisions and refuse planning consent for these contentious, unwanted and wasteful projects.

2.0 Representations

We refer especially to the two matters numbered 6 and 9 on p. 2 of the letter. These relate to the cumulative impacts of the two wind farms and to other material matters arising since September 2015 respectively.

2.1 We request that the Secretary of State reaffirms the refusals of Llanbrynmair and Carnedd Wen because they are part of a larger project or group of projects which have not been properly assessed or subjected to full community consultation. See background items 1.2 through 1.6 above.

They are proposals for wind generating stations in locations that would potentially, themselves or in combination with others, trigger the controversial Mid Wales Connection proposed by National Grid plc.

2.2 We request that the Secretary of State reaffirms the refusals of Llanbrynmair and Carnedd Wen because the local community we represent supports neither the wind generating stations themselves nor the power line that they would potentially trigger. See background item 1.8 above.

The following quotation is taken from DECC's Energy Bill Factsheet – Onshore Wind, January 2016. *"The Government made a manifesto commitment to decentralise decision making on new onshore wind farms as it believes new wind farms should only get the go-ahead if supported by local people...We have seen many examples of local community groups vigorously opposing wind farm developments and that is why we are implementing these measures. We want to see local communities having a greater say on the development of onshore wind in their area."*

We strongly hope that the Secretary of State will stand by this statement and keep this Government promise.

In conclusion, we would like to say that we do not support the re-opening of the Inquiry or any part of it. This has already been a long and expensive ordeal for people in this community and many others in Mid Wales and Shropshire. We feel that it is important for the SoS to bring finality and to remove the threat that has now been hanging over us for many years.

Yours sincerely,

..... Chairman of Llansantffraid & Deytheur Community Council.
cc. Clerk to the Community Council,
....., Community Councillor, I