

REP70 [AEPG]

(Energy Development)

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**From:**  
**Sent:** 03 October 2016 10:41  
**To:** National Infrastructure Consents  
**Subject:** Llanbrynmair and Carnedd Wen re-determinatioins  
**Attachments:** Objection to re-determination.pdf

Dear Sirs,

The attached PDF, on behalf of the Afon Einion Preservation Group, applies to **both** the Llanbrynmair and Carnedd Wen applications. The latter impacts directly on the Afon Einion considerably more.

Your faithfully

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# Afon Einion Preservation Group

Chairman.

The AEPG is a group of local inhabitants, and visiting enthusiastic environmentalists, whose purpose is the preservation of the rare and protected flora and fauna of the Einion Valley.

This river valley is fed from the hills above Llanerfyl, and is connected with the Banwy, and Vyrnwy Rivers.

Local feeling about the preservation of these rivers and their ecology is very strong indeed. This has been acknowledged by Powys County Council and other local democratic bodies, but NOT by the Cardiff-based Welsh Assembly Government, which is intent on ignoring local desires in favour of unfettered land-based wind farm building in Wales.

We critique the RES and RWE schemes' redetermination. Plus the National Grid application for the Mid-Wales Connector; with respect to the section from the proposed Hub, to the Meifod Valley. With particular reference to the Afon Einion River Valley.

It has been conclusively demonstrated by ecological and environmental studies done by agencies other than National Grid, that Afon Einion Valley is a remarkably precious haven for **European Protected species of genuine exceptional rarity**. It is an ecological resource of great rarity not only nationally, but Europe-wide. Some of its fauna are **exceptionally** rare and threatened.

## First brief qualitative observation.

RWE Innogy UK has said in a statement that it *"remains convinced that this is one of the best remaining locations for a windfarm in Wales"*.

In the view of the AEPG and its local supporters this corporate observation plumbs new depths of fatuousness. In all likelihood the top of Mount Snowdon is the best location for a wind turbine in Wales because it will have the greatest wind-energy resource.

That is no argument whatever for proposing that one should be built there. The same applies to both the Llanbrynmair and Carnedd Wen locations.

## Second brief qualitative observation.

Publication of the Environmental Impact Assessments conducted by both the wind farm companies and the National Grid, has shown a highly disturbing overall bias, which has yet to be explained satisfactorily.

When they appeared, they delivered a considerable shock to the AEPG and other environmental groups by showing a remarkable consistency in their ecologists (paid for by the companies) having been able to "find" those flora and fauna which presented the companies with no hindrance, and to a perplexing extent having *not* found those which would so do.

There has been no opportunity for those supposed ecological findings to be put under any serious third party, non-aligned scrutiny. We consider it completely unacceptable that the companies and their agents such as Bruton Knowles were put in a position of "being both judge and jury".

We strongly believe, without necessarily impugning deliberate malfeasance by the ecological teams, that an unacceptable conflict of interests was thereby structurally built-in.

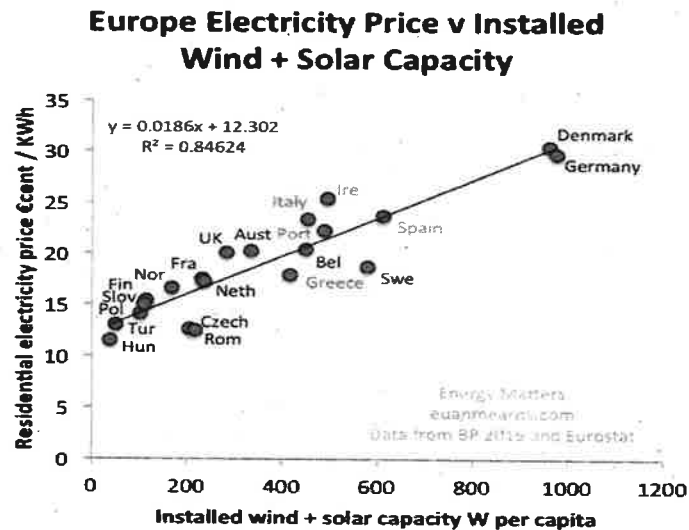
## LOCAL DEMOCRACY.

The AEPG has supporters all over the country. However most of its active members are local inhabitants. Like all of the other local inhabitants, members or not, we remain totally opposed to the RES and RWE proposals. Below are only some of our reasons.

Our Westminster government has already recognised many of the following, and is taking action on them. The Welsh

Assembly Government (WAG), purports to be an outpost of devolved government, bring decision making “closer” to the people. This is a chimera. By attempting to steam-roller over the planning system, and combating Powys County Council's attempts to speak for the local communities involved, the WAG is acting in an opposite capacity.

- Government targets for land based wind powered generation were met many years ago. There is no need for more.
- Not only is there no **need** for more; more would be deleterious as this **new** graphical analysis of costs clearly shows. The greater the penetration of land based wind, the less affordable the electrical power becomes, and more reliant upon risky and expensive interconnectors we become.



- Cost increases as more is installed. This is counter to the companies' claims that economies of scale are obtained.
- The only beneficiary of more interconnectors is the privately owned National Grid Company.
- The sheer scale of both proposed wind farms, and in particular the Carnedd Wen scheme is totally out of keeping with the nature of the region. It would be staggeringly intrusive visually.
- In addition it could not do other than adversely affect the local river network, with its rare breeds populations of protected White Clawed Crayfish, Otters, Badgers and other sensitive species.
- Both regions are important habitats for Red Kite, Marsh Harrier, Peregrine Falcons, Goshawks, and other rare species. Important in their own right, and with their own “rights”, this rich fauna is a key element in what makes this region attractive to its tourists, who provide the biggest single element of its GDP. Cheap, and disgraced attempts to substitute “community payments” for these losses have rightly earned local disparagement.

### PROPOSED 400KvA transmission line.

1. The AEPG has very serious reservations about the process employed to supposedly justify the above mentioned section's location.
2. It is self evident that National Grid (NG) has for reasons so far undisclosed, chosen to define a widely circuitous route for this section. Far more direct routes previously identified as possible by NG have been eschewed. No reasons have been adduced for this.
3. Environmental studies have **only** been effected along this corridor, which is only **one** of those considered earlier by NG to be suitable. NO other route has been assessed for what would be *its* environmental impact.
4. The AEPG has concluded therefore that the primary route decision criteria have been neither environmental nor ecological. The route has been decided upon using other, and not announced criteria, and the supposed environmental and ecological studies have been conducted merely to justify a decision already made on other grounds. Not the least of which would appear to be simpler engineering challenges, and therefore lower costs/higher profits to the corporation.
5. This in turn means that no search has been conducted by NG to identify whether or not environmentally and ecologically this route is optimal. NG has not established that this route will cause *less* harm than other routes previously hinted at being "possibles" by the corporation.
6. NG cannot know if this is the best route ecologically/environmentally. The AEPG strongly asserts that it is likely to be the **worst** because of the know rarity of the Afon Einion's habitat.

### 2. THE ENVIRONMENTAL STUDIES

1. The members of the AEPG and others have diarised the activities of the ecologists conducting the environmental survey.  
2. The survey has been very poorly and scantily conducted. The AEPG strongly maintains that the quality of the survey is such that NG cannot possibly be in possession of sufficient knowledge to be able at this time to go firm on this route section because

2.1 The supposed search for White Clawed Crayfish in the Einion, covered only a few yards, and lasted approximately 15 minutes. It failed to discover the presence of this extremely rare aquatic invertebrate. This was because the species is nocturnal, and its presence or absence cannot be satisfactorily established during daylight hours.

2.2 The AEPG however has found them. Their presence has been confirmed by qualified ecologists of the Montgomeryshire Wildlife Trust (MWT). Members of the AEPG showed the National Grid ecologists a living example, during the NG survey. The National Grid ecologists misidentified the creature and insisted it was an example of an invasive species and should be killed. The MWT using national identification resources proved that the NG ecologists were wrong.

2.2 The survey conducted for Great Crested Newts was commenced a month later than good practice requires, and was completed earlier than good practice requires.

2.3 The bat survey conducted along the "transect" was minimal in the extreme and was not continued for the period required necessary by best practice. It was finished too early in the season.

2.4 As to other issues regarding these surveys the AEPG has difficulty in making observations because the NG will not disclose either what it has found, nor what it has not found but which may be expected to be present. The AEPG considers this to be an extremely unsatisfactory process because it put the NG in the position of being both the judge and the accused.

2.5 Members have been informed by NG personnel that NO other such studies have been conducted along ANY of the alternative routes. The AEPG considers this to be wholly unsatisfactory because no properly informed choice can be made until they are.

The AEPG submits that while NG may wish to install the Mid-Wales Connector, it has not done a sufficiently professional job of conducting these ecological and environmental studies such that it can be certain that the damage that will be done will be kept to the minimum.

The AEPG submits that these studies should be done again and done both properly and with much more detailed and firm oversight.

It is noteworthy that at the Conjoined Public Inquiry, National Grid, and the associated Wind Farm companies submitted Environmental Impact Assessments which failed to acknowledge wildlife that had been identified, and put excessive and unjustified weight on the submitted EIAs.

This is unexplained and puzzling.

The Afon Einion Preservation Group.

