



REP5(SC)

Mr Giles Scott
Head of National Infrastructure Consents and Coal
Liabilities

By e mail

Planning Services
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

10th August 2016

Dear Mr Scott,

Re: Electricity Act 1989 & Town and Country Planning Act 1990

Re-determination of planning application by RES UK & Ireland Limited ("RES") of 27th March 2009 for consent to construct and operate a 100MW wind turbine generating station in Powys ("Llanbrynmair")

Re-determination of planning application by RWE Npower Renewables limited ("RWE") of 11th December 2008 for consent to construct and operate a 130-250MW wind turbine generating station in Powys ("Carnedd Wen")

I refer to your letter of 6th July and apologise for not replying sooner this arising from periods of leave absence from colleagues involved.

As the developments fall within Powys it is the cumulative effects of the developments for communities in Shropshire that is of primary concern for Shropshire Council. It is not clear to what extent the appellants have given consideration to the potential cumulative impacts arising from the proposals. These will include potential impacts arising from the developments during the construction phase and impacts for the life of the developments.

There is also a question as to whether the cumulative impacts of the wind farms development under consideration would then then trigger a requirement for additional transmission infrastructure to reinforce the National Grid in this area through mid-Wales and Shropshire.

National Grid in conjunction with SP Manweb and SSE Renewables had developed proposals for a 400kV connection to link existing and planned wind farms in mid-Wales which would ultimately be submitted to the National Infrastructure Directorate.

That project was at a pre-application stage but has now been put on hold pending the decisions arising from the conjoined wind farm inquiry.

It is therefore points 4,5, and 6 of your e mail of 6th July that ask for additional representations in respect of the cumulative impacts of the wind farms that would be of most concern to communities in Shropshire. In this I would refer the inspector to Shropshire councils response of 25th February 2014 (copy attached) which highlights in further detail concerns about the potential cumulative impacts of the conjoined wind farm proposals through both the construction phase and thereafter.

Specifically these concerns will relate to the following:-

- The impact of construction and maintenance traffic, this includes the impact on communities along the A483, including the physical adequacy of the road network, the potential for road closures to accommodate abnormal loads over the construction phase for the two wind farms and any associated power distribution project that is required as a result of the wind farms,
- The potential trigger for and impacts arising from a new 400kv power line or series of 132kv lines if the two wind farms are consented. National Grid will have connection agreements with a number of Wind Farm projects and the potential remains that if granted consent the RES and RWE schemes could trigger the need for additional transmission infrastructure. These infrastructure projects therefore have a direct and potentially causal relationship with another National Infrastructure Project for a connection to the National Grid that is currently suspended and there are indirect, secondary cumulative effects that have not been established.

It will be for the Inspector to confirm whether there is sufficient evidence to identify the cumulative impacts of the RES and RWE schemes and the potential trigger for a further connection project. Shropshire Council's conclusions of 25th February remain unchanged insofar as it is not clear what, if any, mitigation measures could be implemented to compensate for the requirement for road closures over a sustained period at Pant and Llanymynech to accommodate abnormal loads arising from these development proposals.

It is not considered necessary to re-open the Inquiry in respect of either planning application in respect of the issues raised by Shropshire Council as these remain relevant.

Yours sincerely

Planning Services Manager



Development Services
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire SY2 6ND

Mr Chris Banks
Banks Solutions
21 Glendale Close
Horsham
West Sussex
RH12 4GR

Date: 25 February 2014
My ref: DM/WFI/1
Your ref:

Dear Mr Banks,

**The Mid Wales (Powys) Conjoined Wind Farms Public Inquiry
Cumulative Impact Session**

I write to confirm that Shropshire Council is objecting to the appeal developments in its capacity as an adjoining Planning Authority. The reasons for the Council's objection are as follows:

- The physical impact of abnormal loads and other construction traffic on Shropshire roads and the associated requirement for regular temporary road closures affecting Shropshire communities;
- Effects linked to the need to construct a new high voltage line through Shropshire and Mid Wales in order to transmit electricity from the appeal developments;
- The potential for adverse effects on drainage in the upland catchments of rivers which flow through Shropshire;
- Effects resulting from a combination of issues referred to above.

Whilst the benefits of renewable energy are recognised it is not considered that these have been shown to outweigh the potential negative cumulative effects of the appeal developments. Accordingly, it is considered that a presumption in favour of sustainable development should not apply.

1. Construction and maintenance traffic:

- 1.1 Traffic can pass safely through a community but can still adversely affect that community. Shropshire Council's Highway Officers have advised that a plan has been devised to manage extra large loads associated with the appeal developments. However, this does not necessarily mean that the effect of such loads on local communities fronting the A483 is acceptable. The settlements of Pant and Llanymynech are bisected by the A483 and the appeal developments would result in an unprecedented level of abnormal loads passing through these communities. This would in turn require regular road closures for up to 5 years, repeatedly severing these communities which rely on their connections across and

along the A483. This would potentially be unsustainable and in conflict with relevant policies and guidance (see Appendix 1).

- 1.2 The main components used to construct the turbines for the appeal sites would be transported as abnormal loads on the public highway. The majority would obtain access from the north through Shropshire. With careful supervision, it is considered that the access route through Cheshire and Wales to Oswestry could potentially accommodate these loads, although Policy CS7 of the Shropshire Core Strategy refers to the need to upgrade the Oswestry Bypass.
- 1.3 The situation is different however for the southern part of the route through Shropshire. The A483 is much narrower here, with obvious alignment and visibility limitations and some properties very close to the highway boundary (plan 1). In particular:
- The road width narrows south of the Maesbury junction from >7m to <6.4m and there are many areas with narrow verges and hedgerows close to the carriageway edge.
 - There is a tight double bend south of the Morton junction at Llynclys Hall.
 - Llynclys Crossroads is a busy junction with a number of visibility and alignment limitations.
 - The A458 bisects the village of Pant and narrows further to 5.6m which is inadequate for a trunk road. There are over 100 properties fronting the A483 at Pant, a high proportion of which are close to and / or in elevated positions immediately overlooking the highway. Bryn Offa Primary School is just 50m to the north.
 - There are a series of tight bends in close succession between Pant and Llanymynech.
 - The A483 bisects Llanymynech with 22 properties in Shropshire and 15 in Powys fronting the highway, a number of which immediately adjoin the A483.
 - The canal and river bridges at Llanymynech impose further limitations for extra-large loads.
- 1.4 It is considered that no other area of the northern access route has so many limitations, with the exception of Newtown, where a by-pass is proposed. A by-pass was also proposed for Pant & Llanymynech, but was not proceeded with. The Welsh Highways Agency has also undertaken significant recent improvements to the A483 south of Llanymynech but no equivalent improvements have occurred in Shropshire.

Potential impacts of wind farm construction and maintenance traffic on communities fronting the A483 in Shropshire

- 1.5 A series of road closures would be required to accommodate the abnormal loads over a number of years depending on the number of projects consented. A traffic management plan seeks to reduce disruption. However, the scale and frequency of road closures linked to the appeal developments would be unprecedented and has the potential to impact adversely on local communities in the following ways:

- Inability to access business premises residential property and community facilities during road closures. Potential need to make lifestyle changes to avoid such periods;
- Increased risk of damage to highway facing infrastructure and vegetation (drains, services, lamp posts, vegetation etc) due to collision, vibration, and ground compaction;
- Potential amenity disruption from increased roadworks frequency in order to repair damage caused by extra-wide / heavy loads;
- Potential disruption to the amenity of road fronting properties caused by vibration, warning lights, noise and ancillary disruption associated with the passage of extra-large loads;
- HGV traffic carrying aggregates and other construction and maintenance materials may add to the level of disruption from extra-large loads on the A483 and other roads in Shropshire given the significant requirement to import other materials such as steel and aggregates for each turbine.
- Increased potential risk to road and pedestrian safety due to drivers unexpectedly encountering stationary / rapidly slowing traffic linked to road closures and associated driver confusion / frustration;
- Recurrent disruption of access to A483 and associated road network for local and emergency services.

1.6 Detailed consequences of repeated temporary road closures: It is understood that abnormal loads could take 40 minutes to negotiate the southern half of the Traffic may not be able to re-route during road closures. Hence, most delayed traffic would have to queue for up to 20 minutes awaiting access to the A483, or to follow the convoy at speeds of 15mph or less. Where traffic is able to divert, it may need to re-route on less suitable minor roads through outlying settlements such as Morton, Knockin and Maesbrook.

1.7 Stop over area. It is understood that the appeal developments would generate approximately 1000 - 2000 abnormal loads through Shropshire in total. This equates to 250 - 500 abnormal loads per year over a 5 year period (i.e. 1-2 per weekday). Further abnormal loads may follow if other wind farm developments in the planning system are approved. It is unclear whether the A483 south of Oswestry would be capable of safely accommodating larger abnormal loads due to the limitations of the highway. An overnight stop over area is therefore being sought in the vicinity of Oswestry, to allow extra-large loads to be split into smaller loads. It is not certain however whether a suitable site can be identified and what traffic safety implications there would be if a site cannot be found.

1.8 Timing of construction and associated traffic: It is understood that the individual wind farm sites are likely to take up to 3 years to construct and that construction of the individual sites would need to be staggered given limitations in wharfage and transport capacity. Therefore, abnormal loads linked to the appeal site may need to be transported through Shropshire for 5 or more years following any approval. After construction, there would be a requirement for regular access by maintenance traffic. Industry sources indicate that turbines should last 20 years but a recent study by on behalf of the Renewable Energy Foundation (The Performance of Wind Farms in the UK and Denmark - Professor Gordon Hughes,

Renewable Energy Foundation, 2012) suggests that re-powering could be required by year 15, with a resumption of extra-large construction loads on the A483.

- 1.9 Other wind farm development proposals: In addition to the appeal sites it is understood that there are currently a further 13 wind farm proposals in Powys which await the outcome of the Inquiry. Their locations suggest that the majority would need to be accessed via the A483 through Shropshire. If these sites were all approved there would be a potential requirement for the A483 to accommodate abnormal loads for the foreseeable future. This is because the current appeal sites may need to be re-powered by the time construction of the last pending schemes had finished.
- 1.10 Alternative access routes: It is understood that the developers of the Llanbadarn Fynydd and Llandinham Repower schemes may access these sites via the south from Newport. However, there are a number of significant limitations with the southern route. If some construction traffic was not able to use this route then this would be likely to displace such traffic onto the northern route through Shropshire. It has also been suggested that a deep water wharf could be established on the coast near Aberystwyth. There are however also significant costs and access limitations associated with this option which further highlight the importance of the northern route through Shropshire.
- 1.11 A483 and existing noise: In February 2013 the Welsh Government identified the continuations of the A483 to the north and south of Shropshire as adversely affected by highway noise (<http://data.wales.gov.uk/apps/noise>). Whilst no equivalent study took place in Shropshire it is reasonable to assume that if the same criteria are applied then the Shropshire A483 including at Pant and Llanymynech may also be affected. As stated above, this is one of the most sensitive parts of the northern access route due to the proximity of significant numbers of residential properties to the highway. It is considered that noise associated with abnormal loads and other construction traffic linked to the appeal development may potentially exacerbate this situation.

Construction traffic conclusions:

- 1.12 In conclusion:
- There is a significant limitation with the stretch of A483 to the south of Oswestry. It may be technically possible to manage individual abnormal loads as they negotiate this stretch of highway. However, the appeal developments would require such loads to pass repeatedly in close proximity to the numerous properties fronting the A483 at Pant and Llanymynech for potentially more than 5 years. This would in turn give rise to on-going disruption to these communities for the reasons stated above. Moreover, there is potential for permanent impact to the above communities if the current appeal developments establish a precedent for the other wind farm schemes currently in the planning system. There is therefore the potential for permanent disruption to these communities.

- Whilst measures are proposed to manage abnormal loads there are no detailed proposals to mitigate the effects of sustained and repeated abnormal loads and other construction traffic on the amenity and sustainability of affected Shropshire communities. It is unclear whether such communities would be eligible for the proposed mitigation fund or whether this fund, if available, could achieve any meaningful mitigation in practice.
- The feasibility of suggested alternatives to the northern access route are not fully proven. The availability of a suitable stop over area near Oswestry has also not been established, although this may be essential to allow abnormal loads to successfully negotiate the A483 south of Oswestry.
- Disruption to local communities as a result of wind farm construction traffic also has the potential to impact significantly upon tourism which is an important component of the local economy and is protected by Shropshire Core Strategy Policy CS13 (Economic Development).

2. **Requirement for new high voltage line:**

- 2.1 The existing electricity infrastructure has insufficient capacity to transmit power from the combined appeal developments to the National Electricity Transmission System. National Grid has indicated to Shropshire Council that if the appeal developments are allowed this would be likely to trigger the requirement for a new high voltage line which will pass through Shropshire to the south of Llanymynech and east of Pant. National Grid has also stated that it has connection agreements for 800MW of electricity from proposed wind farms in Mid Wales. National Grid has a duty to connect any wind farms from the date their developers believe they will start to generate electricity. It is for this reason that National Grid prepares its proposals alongside the wind farm proposals even though there is a possibility its project will not be required. It therefore seems illogical that the transmission project has to anticipate the windfarms and yet the wind farm operators do need to look beyond the scope of their own proposals to identify cumulative impacts i.e. these being a trigger for infrastructure projects beyond the wind farm locations. The proposed new power line would extend the impact of the appeal developments to a wider area of Shropshire, affecting communities between Pant and West Felton.
- 2.2 The current proposals for wind farms in Wales have been guided by the Welsh Governments Technical Advice Note 8 which identified strategic search areas for proposed wind farms. Shropshire Council did not exist as an organisation when TAN8 was consulted on so there has never been a dialogue with the Council representing Shropshire residents. In addition, at the time TAN 8 was produced it anticipated transmission of power from Wind Farms carried on smaller wooden poles, not 45m high pylons with the associated impacts these generate. Appendix 2 contains correspondence between Shropshire Council and the Welsh Ministers Carwyn Jones and John Griffiths which highlights the above points. Appendix 3 includes comments received on the Council's website from local residents and businesses against the proposed power route, highlighting the nature and scope of local opposition.

2.3 It is not yet clear what the relative timings of development of the wind farms and any associated high voltage line will be. However, the power line would have its own environmental effects:

- Visual impact of overhead lines,
- Effects of construction traffic;
- Effects on ecology;
- Effects on cultural heritage;
- Leisure / tourism effects;
- Other potential effects on the local community including property devaluation.

2.3 Some of the above impacts are in conflict with relevant policies and guidance (see Appendix1) and may also combine with the potential effects of the appeal developments:

- Properties in the vicinity of the A483 with elevated south east facing views of the scenic Vyrnwy valley may be affected both by wind farm and power line construction traffic and visual impact associated with the latter.
- Construction of foundations for turbines and pylons will require large amounts of concrete and aggregate, generating significant levels of construction traffic. Construction and subsequent maintenance traffic from some appeal developments and the power line scheme may coincide and affect the same highways, including the A483. The duration of construction traffic may also be extended as a consequence of one scheme following another.
- Heritage interests in the arc of land adjoining the construction traffic and power line routes within Shropshire may be adversely affected by a combination of both heavy construction traffic and visual disturbance associated with the power route.
- Tourism is a key sector for economic growth (see App1 CS13) and could be adversely affected by the visual effects of the proposed pylons. Some key tourism assets could be directly threatened by proposed pylons including the unique Vyrnwy Aqueduct, Montgomery Canal and the River Vyrnwy itself which is affected by multiple crossings by the proposed pylon route. There is also a shared concern for the threat to "Shropshire and Mid-Wales Tourism" arising from the effects on the Vyrnwy valley and the visual effects of the Mid Wales turbines;
- The potential blighting effect on property values and business development proposals. It is understood that this is already being experienced by individual properties and businesses in the proposed National Grid Corridor.

2.4 It is considered that the requirement for an overhead power line is a foreseeable consequence of the appeal development and that the power line project is at a sufficiently advanced stage that its potential for cumulative effects is a material consideration with respect to the appeal developments. When the combined effects of the power line and appeal developments are taken into account it is considered that there would potentially be an unsustainable impact on communities fronting the A483 in Shropshire south of Oswestry.

3. Impacts on drainage in Shropshire:

- 3.1 Three of the appeal sites fall within the catchments of rivers draining towards Shropshire Rivers and where flooding is often encountered. The appeal developments have the potential to further increase the rate of run off in upland catchment areas due to the construction of impermeable surfaces and access tracks and effects on existing drainage regimes.
- 3.2 The individual developers have put forward measures to mitigate the potential effects on drainage and surface run-off rates. However, the effectiveness of these measures has yet to be fully established. It is necessary to ensure that the cumulative effect of wind farm development in the Upper Severn catchment does not adversely affect downstream drainage in Shropshire. Moreover, it is reasonable to expect that individual schemes would take proactive measures to reduce rates of run off relative to existing levels, in order to comply with sustainable drainage criteria.
- 3.3 There is concern that if the appeal developments are approved this could establish a precedent for wider turbine development in Mid Wales with additional potential effects on drainage catchments, unless appropriate mitigation is put in place.

4. Conclusion:

- 4.1 The renewable energy benefits of the appeal developments are acknowledged. However, the proposals would also result in adverse impacts to Shropshire communities and environments. It is not clear what if any mitigation could be implemented to compensate for the requirement for the repeated road closures over a sustained period at Pant and Llanymynech to accommodate abnormal loads from the appeal developments. It is also considered that the proposed overhead power line would have the potential to add cumulatively to the impact of the appeal developments on Shropshire communities.
- 4.2 It is concluded that the appeal developments as currently proposed would result in unsustainable adverse effects on some Shropshire communities and environment which would not be outweighed by the need for renewable energy.

Yours sincerely

Planning Services Manager
Shropshire Council
Tel: (_____) _____; Email: _____

APPENDIX 1

RELEVANT POLICIES AND GUIDANCE:

Shropshire Core Strategy:

The sections of the Shropshire Core Strategy which are most relevant to the appeal developments are listed below with officer comments added in italic. The comments relate mainly to the effects of construction traffic from the appeal development on Shropshire's communities and environment and cumulative effects from drainage and the proposed new overhead power line.

Policy CS4 Community Hubs and Community Clusters

This policy aims to increase the level of sustainability of rural communities including by amongst other matters ensuring that all development within Community Hubs and Community Clusters is of a scale and design that is sympathetic to the character of the settlement and its environs, and satisfies policy CS6.

Officer Comment: The effect of the appeal developments would be to require regular road closures south of Oswestry which will result in sustained temporary severance of communities fronting the A483. This exceeds what would reasonably be expected for a road of this nature, is unsympathetic to the character of the settlements and their environs and therefore conflicts with Policy CS4.

Policy CS5 Countryside and Green Belt

This policy controls new development in the countryside order to protect the countryside from inappropriate development.

Officer Comment: It is considered that the volume of abnormal loads and other traffic generated by the appeal developments on the A483 could amount to inappropriate development. This is given the limitations of the construction access route south of Oswestry and the potential for construction traffic to affect the environment of rural communities south of Oswestry in conflict with Policy CS5.

Policy CS6: Sustainable Design and Development Principles

This policy seeks to create sustainable places designed to a high quality, achieving an inclusive and accessible environment which respects and enhances local distinctiveness and which mitigates and adapts to climate change. Proposals resulting in the loss of existing facilities, services or amenities will be resisted unless provision is made for equivalent or improved provision, or it can be clearly demonstrated that the existing facility, service or amenity is not viable over the long term.

Officer Comment: The construction traffic associated with the appeal developments has the potential to sever existing communities on a sustained temporary basis, affecting the health, wellbeing and amenity of Shropshire communities fronting the A483 south of Oswestry. This could lead to less accessible environments and less sustainable communities in conflict with Policy CS6. The level of disturbance is far greater than would be expected for a road of this nature passing directly through residential areas. The appeal developments have made no specific provision to mitigate for the loss of amenities and access which the construction traffic would give rise to.

Policy CS7: Communications and Transport

This policy seeks to achieve improved integrated, accessible and reliable communication and transport infrastructure and services.

Officer Comment: The construction traffic associated with the appeal developments has the potential to reduce the level of accessibility and reliability of local transport infrastructure and services of communities on the A483 south of Oswestry, in conflict with Policy CS7. This is as a consequence of the requirement for repeated temporary road closures over a sustained period. It is considered that the appeal developments make no detailed provision to mitigate for the effects of this community severance.

Policy CS8: Facilities, services and infrastructure provision

This policy seeks to establish sustainable places in Shropshire with safe and healthy communities and a high quality of life with enhanced services and amenities;

Officer Comment: The construction traffic associated with the appeal developments has the potential to reduce the safety and quality of life of communities fronting the A483 south of Oswestry in conflict with Policy CS8. No additional facilities, services or infrastructure have been identified which would mitigate these concerns.

Policy CS13: Economic Development, Enterprise and Employment

This policy seeks to develop and diversify the Shropshire economy, supporting enterprise, and seeking to deliver sustainable economic growth and prosperous communities. Particular emphasis will be placed on: promoting Shropshire as a business investment location and recognising the economic benefits of Shropshire's environment and quality of life as unique selling points which need to be valued, conserved and enhanced. Shropshire's key business sectors will be supported, including environmental technologies; creative and cultural industries; tourism; and the land based sector, particularly food and drink production and processing.

Officer Comment: The construction traffic associated with the appeal developments has the potential to impact on the ability to deliver sustainable economic growth and prosperous communities by sustained temporary severance of communities and disrupting their ability to access local services. This could in turn impact on the viability of local businesses, including tourism and agriculture, in conflict with the objectives of Policy CS13. The level of disruption is far greater than would be reasonably expected for a road with the limitations of the A483 south of Oswestry.

Policy CS16: Tourism, Culture and Leisure

This policy seeks to deliver high quality, sustainable tourism, and cultural and leisure development, which enhances the vital role that these sectors play for the local economy. Promoting connections between visitors and Shropshire's natural, cultural and historic environment, including through active recreation, access to heritage trails and parkland, and an enhanced value of local food, drink and crafts. Supporting development that promotes opportunities for accessing, understanding and engaging with Shropshire's landscape, cultural and historic assets including the Shropshire Union Canal. Supporting schemes aimed at diversifying the rural economy for tourism, cultural and leisure uses that are appropriate in terms of their location, scale and nature, which retain and enhance existing natural features where possible, and do not harm Shropshire's tranquil nature.

Officer Comment: The construction traffic associated with the appeal developments has the potential to detract from the Shropshire's visitor / tourism offer by regularly disrupting access to local tourism and leisure facilities in conflict with Core Strategy Policy CS16. The requirement to construct a high voltage line in an area adjoining the A483 in Shropshire

has the potential to impact further on local tourism / leisure facilities. This is as a consequence of visual impacts, impacts and impacts on the setting of natural and heritage assets including the Shropshire Union Canal.

Policy CS17: Environmental Networks

This policy aims to identify, protect, enhance, expand and connect Shropshire's environmental assets, by ensuring that all development: Protects and enhances the diversity, high quality and local character of Shropshire's natural, built and historic environment, and does not adversely affect the visual, ecological, heritage or recreational values and functions of these assets, their immediate surroundings or their connecting corridors. Development should not have a significant adverse impact on Shropshire's environmental assets and should not create barriers or sever links between dependant sites.

Officer Comment: A new overhead power line which will be required as a consequence of the appeal developments. This has the potential to cause significant adverse effects to Shropshire's natural and historic assets including visual impacts and effects on drainage, ecology and archaeology. Whilst some mitigation may be possible it is not clear whether the new power line would comply on balance with Policy CS17. The impacts associated with the power line in Shropshire need to be seen in the context of the above noted effects of construction traffic linked to the appeal developments and the other potential environmental effects of the proposals in Wales.

Policy CS18: Sustainable Water Management

This policy advises of the need to integrate measures for sustainable water management into development to reduce flood risk and protect water quality.

Officer Comment: The new power line which will be required as a consequence of the appeal developments has the potential to adversely affect local drainage along the power route corridor. This has the potential to add to possible drainage effects from the appeal developments as a consequence of changes in upland drainage in conflict with Policy CS18, unless appropriate mitigation measures are applied.

National Planning Policy Framework

The NPPF establishes a presumption in favour of sustainable development (s14). Sustainability has three dimensions, economic, social and environmental (s7). The NPPF advises that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change (94) and acknowledges the responsibility on all communities to contribute to energy generation from renewable or low carbon sources (s97). However, the renewable and low carbon energy practice guide (see below) states that the need for renewable or low carbon energy does not automatically override environmental protections.

In the case of the appeal developments, construction traffic and the related requirement to construct an overhead power line through Shropshire and Mid Wales would result in a wide range of adverse and cumulative impacts. These would affect the environment of the construction and power line routes through a combination of heavy traffic, visual impact and disturbance to habitats, heritage and drainage. They would affect the economy through effects on tourism, leisure interests and local businesses. They would also affect the social fabric of affected communities, including by severing communities through

repeated and sustained road closures to accommodate abnormal loads and through adverse effects on sources of local income such as tourism.

It is considered that these effects would be difficult or impossible to properly mitigate and that the renewable energy benefits of the appeal developments are therefore outweighed by the above impacts. Hence, it is concluded that the appeal developments are not sustainable and the presumption in favour of sustainable development should not apply.

Planning practice guidance for renewable and low carbon energy: (DCLG, July 2013).

This practice guide reaffirms the importance of renewable energy and advocates community led renewable energy initiatives. It emphasizes amongst other matters that (15):

- the need for renewable or low carbon energy does not automatically override environmental protections;
- cumulative impacts require particular attention;
- great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;
- protecting local amenity is an important consideration which should be given proper weight in planning decisions

Officer comment: It is considered that there has been limited engagement with communities in Shropshire who may experience cumulative impacts from the appeal developments and the proposed high voltage line and that insufficient consideration has so far been given to protecting the local amenity of these communities. This is a separate matter from highway safety and management of abnormal loads.

APPENDIX 2

**CORRESPONDENCE BETWEEN SHROPSHIRE COUNCIL AND WELSH
MINISTERS CAERWEN JONES AND JOHN GRIFFITHS**



Carwyn Jones
First Minister of Wales
The National Assembly for Wales,
Cardiff Bay,
Cardiff,
CF99 1NA

Development Management
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

8th July 2011

Dear Mr Jones,

REVIEW OF TECHNICAL ADVICE NOTE 8 (TAN8): PLANNING FOR RENEWABLE ENERGY

The pre-application consultation for a 400kv connection and substation locations promoted by National Grid, Scottish Power Energy Networks and SSE Renewables to connect proposed wind farms to the transmission network has provoked significant interest throughout communities in Powys and Shropshire.

The consultation has revealed a number of serious issues arising from the adoption of the TAN8 document, its implementation and perhaps unforeseen consequences relating to infrastructure requirements for communities throughout England as well as Wales.

Shropshire Councils were not consulted on TAN8 or its implications and it is not clear whether questions about the broader infrastructure implications were raised or considered at the time either by Welsh or English local authorities. In light of this we would ask that urgent consideration be given by the Welsh Assembly Government to revise TAN8 having regard to the emerging proposals for wind farms in mid Wales and to consult with local authorities in England on the wider impacts and implications, including potential infrastructure requirements.

An indication that these broader strategic implications were not considered at the time TAN 8 was published is evidenced by the publication of the Powys Wind Farms – Access Routes Study of October 2008. This document published jointly on behalf of the Welsh Assembly Government, the Mid Wales Trunk Road Agency and Powys County Council considered the transportation issues to construct wind farms identified as part of TAN 8. The executive summary opens with:-

"In June 2008 the Prime Minister announced a £100bn wind energy expansion initiative which will potentially involve the construction of 4,000 onshore and 3,000 offshore turbines in the UK. Most onshore turbines will be installed in rural upland areas where existing road access is poor. The Welsh Assembly Government (WAG) has a significant role to play in helping the central Government meet their target outputs for wind energy generation, and has provided advice on planning these infrastructure documents in their

advisory document "Technical Advice Note 8 (TAN) 8: Planning for Renewable Energy". The scale of the Planned development is unprecedented, potentially resulting in more than 470 additional wind turbines in Powys and Ceredigion alone. This will generate 3,300 long distance abnormal load movements together with other related heavy Goods Vehicle (HGV) movements throughout Wales over a period of at least 5 or 6 years, potentially longer."

Although this document focuses on disruption arising from transportation issues it also raises broader strategic impacts arising from TAN 8.

"From a National perspective, it is acknowledged that there are four main issues which may jeopardize the time scales set by the Government for renewable energy developments:

- * Delays in securing planning consents due to a variety of reasons e.g. conflict with other policies;
- * **Grid Connections not being available i.e. areas of wind energy production generally being distant from the main areas of demand;**
- * Supply chain limitations due to world wide demand for wind turbines
- * Inadequacy of existing highway network in rural wales for the delivery of abnormal loads on such a large scale"

The point about grid connections not being available is not referenced in TAN8 nor is there any consideration given to the impact of wind farm development in Wales on England.

TAN 8 identifies 7 Strategic Search Areas (A to G) being broad areas within which wind farm development could be supported in principle. These are primarily sparsely populated upland areas free from significant environmental constraints.

Strategic Search Areas B (Carno North) C (Newtown South) and D (Nant-y-Moch) have a proposed total of 500MW capacity identified to meet the TAN 8 Target. In practice, within these 3 strategic search areas the potential power generation is 1233MW having regard to existing schemes (79W) and planned (1154MW). Therefore if all those schemes at the planning stage are approved the TAN 8 capacity figure would be exceeded by a minimum of 654MW, more than double the original TAN 8 figure.

In your statement of 17th June I note that you recognize that the potential impact of wind farm development was not considered at the time TAN 8 was published:-

"In our view the TAN 8 capacities should be regarded as upper limits and we call upon UK Government to respect this position when they finalise the Renewable Energy National Policy Statement and not to allow proliferation when they take decisions in individual projects in Wales."

This is presumably a reflection also on the fact that following the introduction of the 2008 Planning Act nationally strategic applications including decisions on wind farm developments of 50MW or more are considered not by local planning authorities, but by

the Infrastructure Planning Commission. Consequently decisions about wind farms in Wales are taken by a centralized team based in Bristol.

Shropshire is experiencing the impact now of planned wind farm developments in Wales. The wider scheme provides for 132kv connections from wind farms in mid Wales to a new hub, the preferred locations identified by the promoter being either at Abermule or Cefn Coch. From there a new 400kv connection would be made to the existing 400kv network and the promoter has identified a route corridors through Shropshire as its preferred option. Having regard to the tension between managing cost and impacts it is possible, and indeed feared by many that the connection would be made by way of an overhead line and pylon route.

Although this project is at a consultation stage a report was considered by Shropshire Council's Cabinet on 15th June where it was resolved to object to any overhead line solution and I note that this accords with your own view in respect of similar development in Wales. In your statement of 17th June you note

"It is overcapacity which has lead to proposals for major new overhead grid infrastructure. We contend that the level of capacity within the Strategic Search Areas which we set in 2005 would negate the need for obtrusive pylons which are causing such concern. My Government would not support the construction of large pylons in Mid Wales and my Ministers are pressing this case with national Grid Transmission and with Ofgem"

In addition a number of broader issues were raised by Shropshire Councillors and public speakers including:-

- The integrity and validity of TAN 8 promoting wind farm development was criticized by a number of speakers and in particular the fact that Shropshire was not consulted on this document and nor were the strategic infrastructure implications considered when TAN 8 was published.
- The efficiency of wind turbines as a means of providing a reliable and sustainable contribution to the nations power supply was questioned.
- Visual impact and impact on the landscape of pylons – in particular the 400kv 45m design.
- The implications for flood risk in particular a view that the infrastructure required to construct the wind farms will contribute to more surface water run off and exacerbate flood events particularly at the confluence of the River Severn and River Vyrnwy.
- That the consultation process is flawed and divisive setting one community against another. In addition the project news brochure titled "Mid Wales Connection" is believed by some to have been misleading and inadequate.
- That National Grid has failed to evaluate the alternative options placing too great an emphasis on the economic cost of providing the connection
- That potential health risks have not been properly evaluated or considered
- That tourism and the visitor economy play a key role in Shropshire and this would be compromised if an overhead line solution is promoted

- That the Government is not looking at the issue of energy generation holistically and there is inadequate coordination between energy generation and transmission projects
- That the benefit arising from any planning obligation should the development affect Shropshire should go to the communities most affected.
- Adverse impact on a low wage economy
- That traffic concerns have not been properly assessed
- That the IPC process has not been properly explained

These comments present an overview of those expressed at the Cabinet meeting. I would be interested in meeting with you and/or discussing these issues further which affect both England and Wales

Yours sincerely

Leader
Shropshire Council



July 2011

Dear Colleagues,

The Welsh Government's energy policy and aspirations are set out in "A Low Carbon Revolution" which identifies Wales' sustainable renewable energy potential to 2020/2025. We remain committed to pursuing these aspirations and promoting all forms of renewable energy with onshore wind as currently the most viable technology.

Within the aspirations set out in "A Low Carbon Revolution" is a specific reference to the contribution which can be made by onshore wind in Wales, which we believe has the potential to provide 2 gigawatts of capacity. These figures set the context for the revision of Planning Policy Wales (PPW) which was undertaken in February this year. PPW is the parent document to Technical Advice Note 8 (TAN 8) and both of these seek to facilitate Wales' potential output of renewable energy.

An important function of TAN8 is to restrict the proliferation of large scale wind farms in other parts of Wales. We also need to ensure that windfarm development *within* the SSAs is proportionate and balanced with other development needs in these areas. Our approach is to limit the development of large scale wind farms to the areas of Wales which were independently and empirically assessed to be the most suitable. These are the seven Strategic Search Areas (SSAs) in TAN 8. Further, wind farm development should not reach such a scale that it would necessitate other developments that would run counter to the policy positions set out in TAN 8, for example on transmission network reinforcement.

The Welsh Government remains fully committed to its planning policies contained in Planning Policy Wales and Technical Advice Note 8 and these, together with the policy clarification letter on transportation matters of 1st April 2009, issued by the Chief Planner, set the planning policy framework in Wales.

In the light of recent media coverage, I thought it would be helpful to write to stakeholders to provide further clarity on the issue of **maximum** installation capacities for onshore wind within the Strategic Search Areas (SSAs) identified in TAN 8 in 2005.

The potential estimated in the Low Carbon Revolution Energy Policy Statement was based on the **maximum** capacities that we considered appropriate for the SSAs in TAN 8 in 2005. The maximum capacities of the SSAs as provided for and referenced in TAN 8, were assessed by independent consultants Garrad Hassan and provide for almost 1700 megawatts of onshore wind across all our SSAs. The remaining 300MW are anticipated to come from a combination of developments under 25MW, brownfield sites as well as community and local schemes and a contribution from micro-generation. We remain committed to achieving this potential.

For ease of reference, the identified maximum capacities for each of the SSAs as identified by Garrad Hassan were as follows: SSA A 212MW; SSA B 430MW; SSA C 98MW; SSA D 212MW; SSA E 152MW; SSA F 430MW and SSA G 132MW.

TAN 8 fully recognised the reinforcement of the transmission network in Mid Wales as necessary to the realisation of additional generating capacity in the area, as well as providing a stronger more reliable network for energy users. TAN 8 set out the Welsh Government's view that connections from the individual turbines to a substation is "via underground cables". TAN 8 details that any connection from a substation to the nearest point of the distribution network would be "achieved by a standard 3 wire system on wooden poles or by undergrounded lines". This remains the Welsh Government's view and is reinforced by the approach set out within the Renewable Energy Route Map for Wales in 2008, and the Energy Policy Statement in 2010. Provided development is limited to the maximum capacities above, we do not believe that there is a need for the large, visually intrusive, high voltage grid network infrastructure and associated sub station of the kind proposed within Mid Wales. Where new grid is required, we expect the grid company and regulator to ensure that it is located, designed and installed as sensitively as possible, using appropriate techniques, including the use of undergrounding.

You will be aware that the UK Government has issued National Policy Statements for Renewable Energy Infrastructure for consideration by Parliament, which will provide the primary basis for decisions by the Infrastructure Planning Commission (IPC) on projects over the devolved threshold of 50MW in Wales. Nevertheless, we expect all decision makers in Wales, including the IPC and its successor, to recognise our spatially specific policy outlined in TAN 8 and to respect the fact that the Strategic Search Areas have a finite environmental capacity and output should not exceed the maximum levels as assessed in 2005 and outlined above.

I would remind you that in relation to those consents which are devolved matters in Wales the Welsh Government policy provides the primary basis for consideration for local planning authorities when producing Local Development Plans and is material when making decisions on individual planning applications.

For the avoidance of any future doubt, when determining planning applications under town and country planning legislation on energy related projects within Wales (other than certain energy installations), the key planning policy framework comprises the local planning

authority's adopted development plan, and where it is more recent, the Welsh Government's Planning Policy Wales and Technical Advice Note 8.

Our future well-being, both material and social, will be dependent on achieving sufficient supplies of affordable low carbon energy. This move to a low carbon economy is an essential part of our commitment as a Government to sustainable development. Done successfully it will strengthen our economic well-being, improve the environment and help to address key social issues such as fuel poverty, and we look to work with our key partners to help us deliver this.

John Griffiths AC / AM

Gweinidog yr Amgylchedd a Datblygu Cynaliadwy
Minister for Environment and Sustainable Development

APPENDIX 3

COMMENTS RECEIVED BY SHROPSHIRE COUNCIL AGAINST THE PROPOSED NATIONAL GRID PYLON ROUTE – FEBRUARY 2014

I am director of Four Crosses Nursery, which is based in Four Crosses near Llanymynech Powys. We are the largest producer of potted plants for the landscape sector in Wales. We sell nationally using our own and contracted transport. Over many years we have slowly grown the business, and have weathered the recession well. We have done all the things small businesses should do, cut costs, and looked very closely at procedures so as to become more efficient. This has enabled us to become more competitive in the market place. Several new companies have approached us to grow plants for them- this would entail a considerable expansion program, which would include the purchase of new machinery and the hiring of more staff. However this is dependent on my business being able to transport goods in and out efficiently. The current proposals for wind farms in mid Wales, which collectively will be the largest onshore wind farm in the world, will have a detrimental effect upon my business. Throughout the year we have goods outbound and inbound, and during a period between February and the end of May besides my own deliveries I rely on time critical deliveries of goods to my nursery. Having read the Capita Symonds report for Powys County Council, which outlines the transportation plans for the wind farms into mid Wales I am strongly of the belief that through no fault of my own my business will fail. The A483, which runs close to my business is the main north-south Wales route and as such is already congested. With the additional 400000+ HGV loads required over the 5 year proposed building program would mean an extra 320 HGV loads in a concentrated area per day. On top of this we will have to contend with over 4000 abnormal loads for the actual turbine parts. National Grid has proposed a 40mile route with approx. 5 pylons per mile, a 20-acre substation, requiring 5 x 250ton transformers all relating to the proposed wind farms. Scottish power is proposing 80-100 miles of pylons and overhead wires to connect the wind farms to the hub.. No assessment of the number of HGV and abnormal loads as been made for the construction of the pylon routes. These will need to be added to the figures from the Capita Symonds report but the added congestion is going to adversely affect the viability of my business. During the 5 year proposed construction phase the effects increase in traffic would have on my business will be catastrophic. Indeed many businesses along the A483 and in Mid Wales will be in similar situation to myself. Four Crosses is outside any community benefit area for the wind farms. No amount of community benefit would change my view that the whole proposed wind farm plan for mid Wales would be devastating to my business and other similar businesses throughout the area. I believe the facts stated in the statement are true.

We live in a detached stone cottage next to the Montgomery Canal surrounded by farm land at Maesbury Marsh. The draft pylon route crosses over our garden, 60 metres from our home, after crossing the Montgomery Canal and then heads straight towards the Scheduled Ancient Monument at Bromwich Park. We have no plans to sell our home, which is fortunate since no one would consider buying it at any price at the moment. Without pylons, our property is valued at £353,000, but with a pylon route so close to our house, it would be worth less than half of this. Why is this possible?

For the attention of Mr Owen Patterson

Re: Effect of proposed pylon route on our property

As discussed at the meeting at The Venue last Friday evening I now write to advise how the proposed pylon route has and will affect us. My husband and I live just one mile outside Llanymynech on the Shropshire side. We are now nearly seventy and are thinking of down-sizing. Our property was valued at over £500,000 - a detached four bedroom house with 10 acres of land and stables, etc. but now we have been told by our estate agent that our property is worth 30 - 40% less than the original value. The proposed pylon route runs in front of our house and then very close to the east side of our house and then continues over our ground at the back. So we will have pylons from three sides of our house. We have been told that the chances of anyone actually even looking at it are pretty poor. Our property is certainly blighted. I have taken the situation up with National Grid but they really are not interested. Thank you for taking action over this situation for us.

Dear Mr. Paterson,

Following the public meeting in Oswestry last Friday, you are no doubt already aware of the research by Professor Gibbons at the London School of Economics which shows that prices of homes within 1.2 miles of wind turbines drop by 11% and by 3% within 2.5 miles. The story was reported widely in the press at the weekend. Here is a link to his working paper on the subject.

<http://personal.lse.ac.uk/gibbons/papers/windfarms%20and%20Houseprices%20November%202013%20v5.pdf>

As requested at the public meeting on Friday 24 January I am attaching a copy of the consultation submission that we sent to National Grid at the end of November 2013. As a local landowner and business this document sets out all our objections and observations on the current draft route for the gridline and could be used as evidence as requested by both Owen Paterson and Keith Barrow.

Dear Mid Wales connection/Shropshire team,

This morning I received the email below from Gary Swaine. Some time ago I did send Owen Paterson/DEFRA a CD full of testimonies from residents adversely affected by close proximity to (sometimes proposed) wind turbines as well as testimonies or letters from Estate Agents. There was too much information to send it all by email. In reply I received confirmation that this information would be used for DEFRA's survey regarding the impact of wind turbines on properties and small business, but so far I have been unable to find any information on DEFRA's website regarding a possible publishing date. I understand that you run a website which includes such testimonies and that you might be interested to see what I sent to DEFRA. If I have an address I could indeed put a CD in the post. I should also like to have the web address of your site so I can take a look at what testimonies might already be on there and how you deal with anonymity as some of those who gave me testimonies wish to remain anonymous.

Notwithstanding the doubts of overall efficiency of wind power I wish to state my total objection to the above proposal and, indeed, to the erection of any new pylons within the county of Shropshire. Shropshire is a county of outstanding natural beauty, cultural and historic interest and is a major attraction for visitors world-wide and it is also our heritage which must be guarded against the vandalism of erecting unsightly pylons. Today with the vast improvement in communications the public are more easily made aware of planning proposals, unlike in the 60s when so much desecration of our beautiful Shrewsbury was allowed to proceed, and I have not yet spoken with or heard of anyone who is in favour of this scheme. If the proposed new line was really essential for the benefit of the country as a whole I could only agree to it if it were physically and financially possible for it to be concealed underground. Everything has its cost, but cost should not be the criteria here, for once we have ruined our heritage in our exceptionally beautiful Shropshire countryside and villages, we have lost it for ever and we must make certain that never is allowed to happen.

I am writing about my concerns regarding the Mid Wales Connection Project and how it will affect us at Bromwich Park. Bromwich Park has been recorded for over six hundred years. A deer park called Bromhurst Park was established by the Earl of Arundel in the 13th century. There is an Ancient Scheduled Monument in front of the existing farm house which includes the earthwork and buried remains of a medieval moated site and a post medieval formal garden. If the route goes ahead, National Grid will place pylons on a cow pasture which has been left in permanent pasture because of earthwork remains which have been interpreted as possible water meadows of post medieval date. The Barratt family have farmed Bromwich Park since 1922. I need to diversify to maintain the viability of the farm and pylons will most definitely threaten that. I am converting a redundant Coach House in to a holiday let / Wedding venue this year and I am extremely worried how the pylons are going to affect my business. Who will want to come and stay on a beautiful, picturesque farm and be surrounded by pylons and overhead cables? I have concerns about the effects it will have on Horses as the pylons are routed over a footpath and bridleway which go over the Montgomery canal. National Grids draft route comes directly towards the front of Bromwich Park and the Ancient Scheduled Monument. There will be a pylon within 40 meters of the Monument. I have read chapter

17 of the Draft Route Report which in section 17.3.3 says a key consideration for routing is the minimizing of adverse indirect effects upon these monuments. Achieving this for Bromwich Park is particularly challenging as it is located IMMEDIATELY adjacent to the preferred route corridor. If the project goes ahead, my view will be totally dominated by pylons which is ludicrous considering this is such a historic site surrounded by natural beauty. Brown long eared Bats and Pipistrelle Bats thrive here as well as Curlews, Lapwings and Tawny Owls. I am in the process of restoring ancient hedgerows, planting new hedgerows and reinstating an orchard with local apple varieties. A National Grid representative has said that the pylons can be micro sited but I very much doubt this will be effective as there aren't many trees to disguise them with. This will have a huge impact on our lives and future plans at Bromwich Park. I am trying to create a stunning holiday destination which will also boost tourism and the local economy. The thought of pylons blighting the Shropshire landscape for future generations makes me feel deeply unhappy.

It would be devastating to the area of Maesbrook to have pylons looming overhead because we do live in an area of beauty. That is why visitors come here. They come to enjoy the peace and quiet in our holiday cottage, to watch the wild birds feeding, listen to the owls and hope to get a glimpse of them swooping down skilfully for their tea. The night sky is absolutely amazing. Visitors come to marvel at the clear sky. They do not come to look up to see monstrous pylons. Our income would be greatly reduced. We have repeat bookings from people both nationally and internationally. They will go elsewhere. Tourism is an important part of our rural economy. Wind farms for green energy do not work, that has been proven. If we have to have pylons why can the cables not go into the canal, which follows the designated route. Please take all these issues into consideration. When we have lost our precious garden birds and wildlife there is no going back. They are relying on us, the superior beings! To take care of ours and their environment.

I am writing to register our concerns over wanton destruction of some of the most beautiful landscape in Wales by desecration with pylons

Please see this link:

<http://www.telegraph.co.uk/earth/energy/10597785/Wind-farms-proven-to-cut-house-prices-by-11-says-LSE-report.html>
It stands to reason that properties close to pylon lines, too, will suffer a drop in price.

For the attention of Mr Owen Patterson.

I live at Llanymynech and have farmed here for the past fifty years, since the age of fifteen - worked hard and saved hard for a comfortable retirement. I was diagnosed with cancer last year, so the time has come to sell up. The property has been on the market since last March. Initially there was a lot of interest - until it came to light just how near these pylons are going to be. No one wants to live that close to a massive power line. We desperately need to sell. National Grid and Scottish Power don't realise or don't care how much they are messing with people's lives. Even with compensation and a much reduced asking price, I still don't think we would be able to find a buyer. This nonsense must be stopped. They must find another way. IT'S NOT FAIR!!

Unfortunately we are unable to attend the meeting on Friday 24 January but wish to add our strong opposition to the erection of pylons from Cefn Coch to Lower Frankton. Our concerns, apart from scarring the natural beauty of the area which we can see directly from our property, is that the area is regularly flooded by the Rivers Severn and Vrynwy. Indeed at this very moment we are looking at the flood plain under water in early January and I understand that Shropshire Wildlife Trust have taken over an area near Melverley due to lapwings establishing a significant adoption of that particular area of water! The local roads are already under pressure from the ever increasing traffic. Last year the road from Llyncllys through to Llanymynech was resurfaced with weeks of inconvenience but even now almost every grid has sunk and one is very aware when driving to avoid the sunken areas. Apart from all other concerns it is a well-known proven fact that windfarms are not the most efficient way to generate electricity.

To the Rt Hon Owen Paterson MP and Secretary for the Environment

I attended the meeting tonight in The Venue, Park Hall, Oswestry, on the proposed wind farms in Wales and pylon run through Shropshire. The comments were all against the development for a number of reasons. The main one was the visual impact of the pylons. Some people wanting to sell their properties had been unable to do so because they lived on or near the route. Others had businesses that would be adversely affected. Others were concerned about the effect on tourism and the local economy. One person mentioned that they could feel the effect of a power line when they were close to it. Others were concerned about the need to support the local people because of their position. What nobody mentioned and, which is of great relevance, is why the wind farms and the pylon run are needed. That would not have been a popular comment to make tonight. Yet, it is one of the most important issues that could have been raised. Together with that is the encouragement by the government for the technologies in question. The UK has been generating electricity for a long time. Most generation is achieved by burning fuel. Fuel is running out. Gas and oil are both limited supplies. Some people favour nuclear power. Intelligent people are well aware that each country using it have had their disasters and near misses. Examples are Windscale, Three Mile Island, Chernobyl and Fukushima. In addition to these examples is the massive risk associated with storage of highly hazardous waste for many generations. Also the costs and availability of nuclear fuel are issues that the proponents have not properly considered. For this reason, sensible people are looking at renewable means for generating electricity. The only people who want nuclear power are those who stand to make money out of it and those who don't understand it properly. The point is that electricity is being used as if it was unlimited. What is the government doing to reduce electricity consumption? People are being encouraged to insulate their homes but, that is only part of the story. The government has not adequately dealt with the burgeoning population due to immigration. The government is desperately trying to encourage massive house building schemes. Each new house represents an increase in electricity consumption. Very little is being done to reduce street lighting. I have asked several times for my street light to be turned off. Each request is met by deaf ears. If you fly over the UK at night you notice a large number of glowing areas as countless megawatts are simply burned away to no good purpose. Many offices are heated beyond that required for comfort. Councils waste on an industrial scale. There are many examples. A simple visual one is that this week the roads of Shropshire have been double gritted on several nights when the Met Office and local forecasts did not predict frosts. The first thing that the government needs to do is shut the door to further immigration. This should have happened long ago. This is not racial. It's simply that the country is overfull. The roads and other infrastructure are unable to adequately cope with what we have, let alone, more. Then the government and local councils need to do their part in reducing waste and reducing electricity consumption. In our homes, those of us on very limited incomes, have already pruned down to the bone years ago. I walk round my home with a fleece and woolly hat. I cannot use much less than I am doing. It's highly annoying to watch the extraordinary waste on the part of the authorities and be unable to do anything about it. Wind farms, despite their visual impact do work. Unpleasant as it is to say so, this is a fact. The government knows full well that the spiralling increase in electricity consumption means that it will not be long before supply cannot meet the usage and there will be power cuts. None of this was mentioned tonight but, it's a fact. You ask for hard evidence. It is hard in both senses of the word. The electricity use per capita in the UK has trebled since 1960. The population has increased by 10 million (20%) in that time. This is why there is a scramble to build pylon runs and wind farms and solar farms. Nobody wants a pylon run through their garden or farm and nobody wants one to ruin their view. But most are happy to turn appliances on with no consideration as to where the megawatts are generated. I guarantee that, if the cabling was being carried underground, the meeting tonight would not have been held and nobody would be complaining. It's the visual impact that people are upset about. Knowing that this is the issue, why isn't the cable being routed below ground? That question was not ventilated tonight. The government could easily deal with the issue. I have written to National Grid three times during the consultation period and pointed out all the concerns and facts. What did I receive in return? Whitewash! Again you want hard evidence. Here it is. Underground transmission is 8 to 10 times more expensive than overhead. That's why it's going to be routed overhead. The honourable thing for the government to do is to route the cables below ground. The cost is considerable but, so are wars in Afghanistan and Iraq. At least a decent electricity infrastructure would have long term benefits for the people of the UK. Other areas of massive expenditure that have no clear evidence of benefit, can easily be identified. Sensible people will tell you many huge savings that could be made with no loss of benefit to the people of the UK. Many are happy for the wind farms and pylon runs to go ahead as long as it doesn't go through their own backyard. Most but not all people raised their hands in the votes that were declared unanimously against wind farms. It would have been unpopular tonight to have ventured any other opinion. Nobody mentioned any other alternative means of meeting the need for more electricity. It was said that onshore wind farms are not useful and the place for them was offshore. Whilst agreeing that offshore wind

farms are very good, they are hugely more expensive than onshore ones both in capital and revenue costs. People that find they are personally affected by anything turn out abundantly to complain. Of course the complaints are justified but the problem needs to be tackled at source rather than dealing with the unwanted fruits of poor government control and policy. The debate tonight and the important issues that were not discussed could be simplified into the following points.

- 1) If the UK uses more electricity then it has to be generated.
- 2) The government is behind creating this extra capacity instead of removing its need.
- 3) The emphasis is on doing it as cheaply as possible. This is on the part of government and National Grid.
- 4) The public will have to put up with the consequences unless the government steps in.
- 5) Whatever route a pylon run takes, some people will be adversely affected. There is no compensation and even if there was, it would not reduce the effect of the pylons on the area.

We don't want to look at pylons and miles of cables. Put them underground. Are there any other benefits to routing underground? The answer is, Yes. Here are two of them.

- 1) How many people had to manage without electricity this winter due to gales? Cables overhead are subject to wind and rain and snow and ice. Cables below ground do not suffer from the elements.
- 2) Overhead cables generate a lot of electromagnetic radiation. This beams down and through people in the vicinity. If you want a shocking demonstration, plant a fluorescent tube vertically under a power line and it will light up. It is believed that there are health issues. For example, it is believed that there is an increased risk of developing leukaemia, particularly in children. Underground cables are shielded and the risks are much lower. Each type of energy beamed unnaturally into people has an unwanted health consequence. These consequences are not perceived for many years but are found out afterwards. The human race does not learn but continues to expose people to new dangers until the effects get proved. Its likely that unnatural amounts of electromagnetic radiation will have health consequences as certainly as RF energy, X-ray energy and ultrasound energy are shown to have.

It is obvious that the way the UK is going at present demands more electricity production. Renewable means of generation is the right way forward. The government should ensure that underground cables and other controls be exercised to minimise the impact on the public.

Following the public meeting on the 24 January at The Venue, we feel it only right that we make a written representation against the proposed wind farms and associated connection route (mainly pylons) that will run through Powys and Shropshire. Starting from our own 'selfish' perspective, we have a house in Pant. Our house is not a grand country mansion and does not have vast grounds, the two main reasons we bought it were because we love the outlook across the beautiful Shropshire Plain and the surrounds. We have unspoilt views across the Vyrnwy, Severn, Nesscliffe Hills, Rodneys' Pillar onto the Long Mynd and the Cleve Hills. Every morning this reminds us of why we live in this part of the world, it's certainly not for the high flying jobs/salaries or all night entertainment, we live here because it makes us stop and look and enjoy the simple things in life. The things that ultimately get you, or certainly us, through the everyday grind! And it can't be just us who thinks this otherwise locals wouldn't have put all that effort into erecting the wonderful Border Viewpoint panorama on Llanymynech Hill and I'm sure that not as many people would make the journey from far and wide to experience a round of golf on the hill! These comments clearly extend to all the hills forming the western boundary of the plain. So the Holford Rules which state 'Choose tree and hill backgrounds in preference to sky backgrounds' fall if you reside to the west of the proposed connection corridor! But it's not just about the views, it extends beyond this. Connection routes will follow valleys which are commonly occupied by watercourses, canals and footpaths along which people walk, cycle and ride. We enjoy being able to walk out into the countryside which is notably untouched by 'modern industrialisation'. People move to and visit the counties of Powys and Shropshire for these very reasons. So for the sake of the locals and the tourist industry in the area, let's keep it that way. Other than the sense of wellbeing and amenity aspects, not unimportant issues I hope you will agree, there are many other reasons why these proposals should not go ahead. We know a family who live adjacent to an existing overhead high voltage line. Three family members are suffering from illnesses. A coincidence? I'll let you be the judge of that! To make it even worse when the weather is damp, they are constantly plagued by a 'buzzing' associated with an electrical discharge. Any footpaths, canals, rivers and bridleways etc. in close proximity to the lines will also be effected by these issues along with the people and animals that use them. Migrating wildlife are

known to use the river/canal corridors to navigate. Swan fatalities are a well-recognised issue associated with overhead lines. The MOD training area- a line of high voltage cables would quickly sort the good from the not so good helicopter pilots! And onto a real bugbear! Wind farms= green energy? I wonder if someone undertook a full 'Life Cycle Analysis' on the combined project i.e. wind farms and associated connections, would the whole approach be considered so environmentally conscious in terms of carbon emissions etc. This technology is also known to be inefficient, so why do people blindly pursue associated targets? (that aren't really even meant to exist). Especially when they will impact so heavily on those few havens of tranquillity that remain for people and wildlife! If this whole project goes ahead NG should at least have the decency to 'get with the times' and use the latest technology. Surely the great British nation with such a strong legacy of innovative engineering solutions can come up with something better than the outdated lattice pylons? If this is to go ahead then NG could use this as a flagship development to lead the way in power transmission. Also don't over spec the line! If a 400 kV line was constructed and the wind farm fad died a death (as it will), then that would be a travesty if the output from a handful of wind farms was all that the line transmitted. Perhaps rather than trying to generate more power more attempt should actually so be made to reduce power consumption. Maybe this representation may be perceived to be a bit 'touchy feely' in places, and as a scientist I don't find that style comes to me naturally, but that is simply how we feel. We love Shropshire and Powys so please, please don't let anyone ruin them in the name of an inefficient, 'faddy' phase in the history of power generation. Please can we also rally support for the public enquiry relating to the wind farm planning applications in Powys. No wind farms=no pylons.

As chair of the West Felton Parish Plan Steering Group I am most concerned at the potential devaluation of 2 ancient monuments in our area. The first is St Winifred's Well, in West Felton Parish and close to the village Woolston. The site is now owned by the Landmark Trust after recent refurbishment and is used as a self-catering tourist venue, close to the Montgomery Canal and surrounding walks. The planned proximity of the pylon line, somewhere between 50 and 300m to the northwest of the site, can only be detrimental to its tourist potential, which in turn reduces the tourism potential of the whole wider area of West Felton and South Oswestry. The second site is an English Heritage site, the moated castle-motte of West Felton's Norman castle, which is immediately northwest of St Michael's church in West Felton and on a site overlooking the Montgomery canal in the Aston area. Although the castle mound is currently fenced off and hard to see, it has potential to become part of a tourist trail of ancient monuments in the wider area. Tourism is a factor being strongly considered in our Parish Plan with the hope of future economic reinvigoration of West Felton. The pylon line is planned to be in such a position as to be clearly visible from this site, which will diminish the historic atmosphere of the site. I hope you will take these matters into account when deciding upon the economic considerations of the suggested pylon line route.