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BY EMAIL ONLY

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For the attention of Inspector A D Poulter BA BArch RIBA

14 February 2013

Dear Sirs

MID WALES (POWYS) CONJOINED WIND FARMS PUBLIC INQUIRY

SP MANWEB PLC'S PRELIMINARY RESPONSE TO THE ALLIANCE SUBMISSION DATED 4 FEBRUARY 2012

We write on behalf of SP Manweb plc ("**SPM**") to set out its initial response to the Alliance submission ("**the submission**") dated 4 February 2012.

The submission is primarily directed towards the four free standing wind farms (Llanbadarn Fynydd, Llaithdu, Llanbrynmair and Carnedd Wen) and it is principally for the developers of these wind farms to respond.

However, SPM does not accept or agree, as a matter of law, with the Alliance's assertion that the four free-standing wind farms and their connections amount to a single project. SPM does not intend to make any further representation on this issue as the point is for the four wind farm developers to respond on.

It is for, in the first place, the developers and, thereafter, the decision maker to judge the extent of the assessment of cumulative effects reasonably required under Part I of Schedule 4 of The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2000 (the "**EIA Regulations**"),

SPM has already set out in its outline statement and in procedural submissions the expected timetable for the publication of additional information on both the section 37 connection to the Llandinam wind farm (the application before the inquiry) and also on the SP Mid Wales Connections Project which will connect the other four wind farms.

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As SPM noted in its outline statement, and in response to comments raised by the Countryside Council for Wales ("**CCW**") in its letter dated 24 October 2012 and the reasons stated by Powys Council in its Form B response dated 30 October 2012 concerning the need and design for the proposed OHL, SPM is currently assessing the technical implications of bringing forward suggested design modifications. SPM has advised that the outcome of this technical assessment will not be available before Spring 2013. The work may lead to modifications to the design of the supports for the overhead line (i.e. the poles) and their locations, which may require additional environmental assessment and the production of a further SEI. In any event, SPM has previously noted that it intends to submit additional environmental information in order to respond to late comments received on the Application in October 2012, immediately prior to the Powys County Council Cabinet meeting that considered the Application. As previously indicated, SPM considers that the additional assessment would be completed by late summer 2013 with the SEI, if required, being submitted during autumn 2013. It will therefore be only thereafter that SPM will be in a position to prepare its evidence for the inquiry. It was for this reason that SPM has sought not to be heard prior to early 2014.

Turning to the SP Mid Wales Connections Project, there is a point of clarification to be made. Paragraph 7 of the Alliance letter appears to suggest that there will be separate connections from each of the four free standing wind farms to the hub. In fact, the current proposal is for relatively short connections from each wind farm. The two wind farms which are the subject of this Inquiry in SSA C will then connect into a shared connection (along the preferred CC1 corridor) and the two wind farms in SSA B will connect into a shared connection (along the preferred BNC1 corridor) before connecting to the hub.

The SP Mid Wales Connections Project requires development consent under the Planning Act 2008. SPM is currently part way through its pre-application consultation process, having announced its three preferred route corridors in July 2012. More detailed line routes will be presented for consultation during Spring 2013. SPM expects to announce its proposed line routes in Autumn 2013. It is currently anticipated that any development consent submission for the proposed scheme will be made in mid 2014.

To the extent, therefore, that it is necessary for the wind farm applicants to consider any cumulative effects of their proposals with the SP Mid Wales Connections Project, SPM will not be able to inform the inquiry with details of its proposed line routes until Autumn 2013.

The Alliance submission – whilst incorrect in its conclusion that the four free standing wind farms and the SP Mid Wales Connections Project amount to a single project – underlines SPM's procedural submissions: whilst it is for the decision maker and the developers of the four wind farms to judge in all the circumstances the information reasonably required for the cumulative assessment of their schemes, SPM has made it clear that before the close of the inquiry and before the decisions are made, the proposed line routes of the SP Mid Wales Connections Project will be known. This factor should be taken into account when timetabling the cumulative impact session.

Yours faithfully

Pinsent Masons LLP