

PERSONAL STATEMENT

Mr Chris Lloyd, Old Wagoners Cottage, Sawmills, Kerry, Newtown, SY16 4LL

Dear Inspector

1. Thank you for giving me this opportunity to express my concern and outrage regarding the proposed separate 132kV heavy duty double wooden pole overhead power line, which SP Manweb and CeltPower are proposing to serve the CeltPower Ltd windfarm expansion project instead of securing a strategic power transmission solution to serve all windfarms within strategic search area C.
2. I will not be able to attend the public session in the afternoon or the evening of the 18 February 2014 to personally present my statement, therefore I trust you will read and take on board my comments and opinions contained within, which I believe to be true.
3. Historically, previous generations of my father's side of the family were local blacksmiths from the Forden area, and my father was raised in nearby Sarn. I was born and raised within the Newtown area, and I purchased my current property in 1994. My wife and I have happily settled within the community of Kerry and have raised our two children here over the last 20 years.
4. My family home is located within the historic Sawmills Conservation Area. The setting of the conservation area is not only prized and appreciated by the residents who inhabit the conservation area, but enjoyed by many of the residents of Kerry and the surrounding hamlets who regularly utilise the popular circular route from Kerry through the Sawmills, the Pentre and past Brynllwarch Hall along the Common Road back to Kerry for recreation purposes.
5. The closest part of the proposed 100 metre wide route corridor is a mere 195 metres from my property in a north east direction.
6. At first glance, SP Manweb's latest drawing identifies the closest heavy duty wooden support structure (structure number 209 as identified on drawing number SP4071503 sheet 4 revision 4.0) as being 245 metres from my property to the north east, and located behind a wooded area when viewed directly from my property. However, closer examination of the Proarb tree/hedge clearance drawing numbers TP-13 and TP-14, contained within Appendix 07d of SP Manweb's 2013 Updated ES, clearly identifies that this group of 150 no. 14 metre high trees is proposed to be clear felled within a distance of 20 metres of the proposed power line (i.e. within a 46 metre wide corridor centred along the proposed power line, and the roadside hedges reduced to a height not exceeding 1.5 metres within a 13 metre wide corridor centred on the proposed power line. This Appendix also identifies that any trees that have the potential to grow within 3 years to a height, or are currently of a height, where they could

topple within a distance of 3.5 metres from the proposed power line would also be felled to the ground.

7. The next double pole structure in the sequence of supports to the north (structure number 208R) would also at first glance appear to be located in front of a group of large trees alongside the Nant Meheli brook, and therefore mitigated by this backdrop of trees. However, Appendix 07d reveals that these larger trees will also be felled because of their proximity to the proposed power line; therefore the background screening will be removed.
8. The three, thick, power line conductors plus the under slung earth wire will obviously be clearly visible from my property; as they will be strung from the top of these large structures at a height of nearly 14 metres above ground level. Whilst SP Manweb may argue that the modern farm buildings of Glanmiheli Farm are industrial in appearance, and will lessen the impact of this particular section of the line; it must be noted that as part of the planning approvals for these new farm buildings, a row of tree planting was proposed and conditioned on both sides of the B4568 county highway as a mitigation measure to screen these buildings from the properties within The Sawmills Conservation Area (see copies of decision notices, planning reports and approved plans that accompany this statement). Examination of Appendix 07d reveals that the hedgeline beneath the 13 metre wide corridor of the proposed overhead power line will be reduced to 1.5 metres in height, and a great number of the trees planted as mitigation screening will be removed if the overhead power line is approved, thereby exposing the farm buildings to the conservation area to the detriment of not only myself and my neighbours, but everyone that visits and enjoys the conservation area for recreational purposes.
9. Viewpoint number 08D (Volume 4 of the 2013 ES) seeks to suggest that the power line and structures will barely be visible from my property because of existing trees. SP Manweb's description of the viewpoint implies that the landscape already contains a number of overhead power lines and other wooden pole structures, and concludes that the addition of an additional power and support structures would not constitute a "major new feature in the landscape".
10. The reality of the situation is that the existing 3-wire 11kV power line clearly visible in the viewpoint photograph is supported on slender single pole structures of a height of about 7 metres, and the 5 metre tall BT pole and single cable is not an unusual feature in any roadside hedge. The proposed 14 metre tall heavy duty double pole structures topped by 6 metre wide, 2 metre high steel gantries on the other hand would be an alien and particularly intrusive new feature within the landscape.
11. SP Manweb's conclusion regarding this particular viewpoint is dismissive at best, and one that I consider to be extremely patronising.

12. In addition to the viewpoints from our property, we do of course travel on a daily basis to and from our property, therefore the proposed overhead power line and heavy duty support structures will be a very dominant feature that we would be forced to endure as we go about our daily lives within this beautiful unspoilt area.
13. During the protracted design process, but after selecting the route, the proposed power line was relocated slightly further away from the Sawmills to the east and south east of the conservation area when SP Manweb belatedly realised the existence of the conservation area during 2009. Viewpoint number 08 (Volume 4 of the 2013 ES) suggests that the power line will not be visible to the east of conservation area in this direction because the wires and structures will be obscured by a small mound and trees; however if the viewpoint was taken from the crossroads or at any other location along the B4368 along the perimeter of the conservation area, the line and support structures would be clearly visible as it crosses the B4568 to the north and traverses the hillside to the south. This viewpoint should be totally disregarded as it intentionally seeks to hide the true impact of this section of the overhead power line.
14. During the consultation process, my wife and I and our neighbours have repeatedly requested that SP Manweb give proper regard to the nature and historic value of the conservation area and its setting, and requested detailed consideration to be given to undergrounding a section of the line within the B4568. This request has been dismissed on the grounds that the additional cost of undergrounding could not be justified because SP Manweb claim to have a duty to provide the cheapest possible connection; and on the grounds that an underground section would result in the need for unsightly terminal structures comprising of 4 wooden posts.
15. The extent of the additional cost to underground this relatively small section of the line has never been quantified; and the attitude of SP Manweb regarding additional costs seems to fly in the face of their duties and the statements made by the right honourable Michael Fallon, (The Minister of State, Department for Business, Innovation and Skills) during the House of Commons debate on 12 February 2014¹ who stated :-
16. *“Under the current regulatory framework, it is for the network companies to submit proposals for new infrastructure to the regulator, Ofgem, and to the relevant planning authorities. The proposals must be based on a well-justified need case, such as new generation connection or maintenance of a safe and secure network. The companies also propose routes and types of infrastructure, and in doing so they are required to make a balanced assessment of the benefits*

¹ Daily Hansard - Westminster Hall – 12 February 2014 - Column 331WH
http://www.publications.parliament.uk/pa/cm201314/cmhansrd/cm140212/halltext/140212h0002.htm#140212h0002.htm_spmi2

of reducing any adverse environmental and other impacts of new infrastructure against the costs and technical challenges of doing so following extensive consultation with stakeholders. Those requirements are set out in their licence obligations under the Electricity Act 1989 to develop economic and efficient networks and to have regard to the preservation of amenity and the mitigation of effects that their activities might have on the natural beauty of the countryside.

17. *In addition to the legal requirement to consider the wider impact of new infrastructure, Ofgem published in July 2013 information for stakeholders on how that should be taken into account. That clarifies the fact that network companies are required to consider wider impacts and alternative solutions to overhead lines. That regulatory approach is reinforced by the Government's energy national policy statements. They set out the framework for factors to be considered when consenting to an infrastructure project of national significance. They make it clear that for electricity networks cost should not be the only factor in determining the type of network technology used, and that proper consideration should be given to other feasible means of connection, including underground and subsea cables."*
18. We have also repeatedly requested that SP Manweb consider a less intrusive support system such as the single pole Trident design. Again, whilst SP Manweb indicated that a single pole design would be drawn up for consideration past the Sawmills, no detailed plans have ever been made available for comparison; and such a proposal has been dismissed on the assumption that the landowners would not welcome it as the shorter spacings would result in more poles and opposition from agricultural landowners. Whilst I understand and acknowledge that the intermediate single pole version of the heavy duty wooden pole support system would result in shorter spacings, the visual impact would be less and the total number of poles (and therefore cost) would be reduced.
19. From viewing the information discussed during the Legacy inquiry, I am also aware that the new unearthed Trident design proposed for that scheme consisted of much shorter and less intrusive support structures with greater spacings (up to 200 metres) than that afforded by the heavy duty three phase conductors and under slung earth wire proposal for this overhead line. I can only conclude that SP Manweb have failed to provide the best possible overhead solution because of an inappropriately located customer substation on ground with inadequate earthing characteristics.
20. It must also be noted that SP Manweb wish to keep all their options open to micro site any of the proposed support structures to any other location within the 100 metre wide route corridor along the entire route in the event that an agreement for the location of any particular pole does not meet with the approval of the landowner, or there are unforeseen ground conditions etc. Not only does this over generous micro siting option make a complete mockery of the documents and conclusions put forward within the Environmental Statement documents, the relocation of support structures resulting in longer spans between structures

and/or over different topographical ground conditions could easily result in the requirement for much higher support structures, additional angle poles with their multi stay support wires or support structures located at more intrusive positions.

21. I firmly believe that the proposal to secure a separate connection over a 35 km route for a single windfarm in SSA C, when all other windfarms within or adjoining the same strategic search area will need to be connected via a strategic network connection taking a completely different route, is poorly conceived and inappropriate.
22. I respectfully request that you reject this 132 kV connection proposal and its associated windfarm proposal.

Yours faithfully

Christopher Lloyd
17 February 2014.