



# The countryside charity Shropshire

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By email only:  
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Dear Bute Energy Group

## **Consultations from 6 September to 18 October 2023 on: Bute Energy – Llyn Lort Energy Park and GreenGenCymru – Vyrnwy Frankton Connection**

### **Introduction**

1. I and other CPRE members attended consultation events at Llanymynech, Cefn Coch and Meifod, and logged into one of the webinars, spoke to various members of staff, asked questions at the time, and also sent in some questions by email. Hopefully staff made note at the time of the comments made, both verbally and in emails.
2. I now provide follow up feedback, which is also referred to in my responses to your online consultation forms. This letter expresses consultation responses in a way that your pre-determined online consultation questions do not necessarily allow.
3. My response to the GreenGenCymru online consultation on behalf of CPRE Oswestry District has reference #00001257 and refers to this letter. My response to the Llyn Lort online consultation on behalf of CPRE Oswestry District has reference #00001259 and also refers to this letter.
4. I may possibly have misconstrued some of the information provided. It is unreasonable to expect the mass of consultees to have read the entirety of documents like the 161-page Green GEN Vyrnwy Frankton Routeing and Consultation Document. It would have been

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helpful to have provided some Non-Technical Summary or Executive Summary of lengthy documents.

### **Inextricably interlinked projects**

5. I repeat the point made forcibly at the consultation events, particularly to Aled Rowlands, that the Bute Energy proposed Llyn Lort windfarm and the GreenGenCymru proposed pylon line are inextricably interlinked projects. The wind farm is useless without a connection, and the pylon line is unnecessary without windfarms.
6. This intricate interlinking is emphasised by the fact that (1) these current non-statutory consultations are being run simultaneously, to the same timescale and (2) the registered address of both relevant companies is identical, as at the head of this letter.
7. The fact that separate planning applications will be submitted for each scheme, under different planning regimes, does not alter this fact. The separation of the planning applications is a species of “salami slicing”.
8. When the time comes, the effects of the connection should be taken into account in the Environmental Statement for the windfarm. Paragraph 4.10.9 of DESNZ’s March 2023 Overarching National Policy Statement for Energy (EN-1) clearly states that:

*“the applicant . . . must ensure they provide sufficient information to comply with the EIA Regulations including the indirect, secondary, and cumulative effects, which will encompass information on grid connections”.*

9. By the same token, the proposed Vyrnwy Frankton Connection is said to be not wholly to export electricity from the proposed Llyn Lort windfarm. For some reason the information does not seem to be within the consultation material, but I was told that the expected capacity of the five Bute Energy energy parks is around 700MW and that the expected carrying capacity of the proposed Vyrnwy Frankton connection is around 800MW. Any planning application for the Vyrnwy Frankton Connection should also therefore take into account the environmental effects of all five of the proposed Bute Energy energy parks.

### **Consultation**

10. A six-week consultation period is about the minimum length acceptable for important proposals like these which affect a wide geographical spread of people. An eight-week period would have been better.
11. Hopefully, at the next round of consultations, everyone likely to be directly affected will be notified before the consultation starts, not some time afterwards, as appeared to have occurred in some instances with these consultations. It would also be preferable if advertisements were taken out in relevant local papers, rather than relying on press releases. One of those local papers should be the Shropshire Star, the most widely read paper in Shropshire, which appeared not to have run any news items about these two concurrent consultations.

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12. As a result, there may well be some people likely to be affected by your proposals who will not have heard about them.
13. Your preferred consultation medium appears to be by use of your online forms. Whilst this may be convenient for you, and for many respondents, there are still many people who are not on the internet, who you need to make efforts to reach.
14. Also, as noted above, a limited number of pre-determined online consultation questions do not necessarily predispose people to make free-form consultation responses. For instance, the grids at question 9 of the GreenGenCymru online consultation form and at question 1 of the Llyn Lort online consultation form both appear to be devised to produce ease of scoring at your end, but they allow no nuance in scoring the questions. To that extent they may produce a misleading analysis.
15. The question *"I support renewable energy projects in my local area"* is a particular instance of that lack of nuance. In CPRE's case, local renewable energy projects are supported as long as they do not cause inappropriate harm. There is no blanket support for absolutely any renewable energy project.
16. Hopefully you will publish the results of the consultations before moving to the next stage of public engagement.
17. It was also notable that you ran no consultation session in England about the Llyn Lort windfarm proposals. Because the wind farm and the pylon line are inextricably interlinked, this was an oversight that should be put right at the next round of consultations.
18. Furthermore, only the Llanfair Caereinion consultation event had both the windfarm and the pylon route information present. In view of the inextricable interlinking of the two projects, all consultation events should have presented both sets of material.

### **Carbon costs and materials**

19. Despite your emphasis on the benefits of your scheme in building a low carbon and prosperous Wales, there appeared to be no hard information as to the carbon costs of construction, either for the wind farm or the pylon line. Without such information, using figures that can be independently verified, it is not possible to make fully intelligent consultation responses. Carbon costs are the very nub of the whole exercise.
20. Equally, it would be helpful to have some statement of intent about where materials will be sourced from. There is little benefit to Wales, or the UK, if materials come from, say, China, using forced labour. The source of the materials will clearly also have an impact on overall carbon costs.

### **Ecological costs**

21. There did not appear to be any information in the consultation material as to the ecological effects of the proposals. When the time comes, it is to be hoped that Biodiversity Net Gain calculations will be factored into the proposals.

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22. It is surprising that no ecological assessments appear to have been carried out to support the choice of turbine locations or the preferred route corridor for the pylon line. This may be a weakness when the time comes to submit planning applications.

### Misleading information

23. One of the criticisms already put to you is that some of the information you put out about the output of the windfarms was willfully, or perhaps just negligently, presented. Board 3 of the Llyn Lort Energy Park consultation boards stated that the proposal “*will provide enough electricity to power 144,000 homes per year*”. This claim was repeated in the GreenGenCymru consultation literature. Your website does say “*Making the Welsh weather work for Wales. Llyn Lort Energy Park is a renewable energy project . . . generating . . . enough to power the equivalent of 144,000 households a year*” but the consultation material on display at the consultation events omitted the vital words “the equivalent of”.

24. Even so, the 144,000 households claim appears to be an inflated figure for three reasons.

- i) Firstly, although you presumably deliberately did not state the capacity factor you used when responding to my email requests, from the figures you provided, it was 35%. This is a much higher figure than is usually quoted for onshore wind. At the consultation events you claimed this was because the turbines to be used are now more efficient than the previous generation of onshore turbines. However, no evidence was provided to support this claim, and I understand that Bute have, to date, constructed very few turbines, so have no empirical evidence on the subject.
- ii) Secondly, households are only a proportion of total electricity consumption. The Digest of UK Energy Statistics (DUKES) gives the figure of around 36% for 2022.
- iii) Thirdly, your consultation literature carries an implication that the scheme is benefitting Wales. The scheme proposes to export all of Llyn Lort's electricity production (and that of all the other Bute windfarms going to the proposed Cefn Coch collector sub-station) out to the national grid 400kV lines in England. Only a proportion of it will then be drawn back into Wales, presumably proportionate to the percentage of households in Wales. For England and Wales combined (and ignoring Scotland for simplicity), that percentage is only just above 5%.

25. Taking these three factors together the number of households in Wales actually likely to benefit from Llyn Lort seems to be only around 2,200, as set out in a document already sent to you. It would be less than that for the area of mid-Wales around the windfarm itself, which area draws its electricity (apart from existing wind farms/generators within the local network) from the 400kV national grid at the sub-station at Legacy, via the Oswestry, Welshpool and Newtown substations, as confirmed on the Open Infrastructure Map you kindly referenced in your email response to me.

26. We would hope that when you make claims in the future about the outputs from Llyn Lort or other Bute windfarms, that firstly, you state openly how your calculations have been made, and secondly, you do not exaggerate them or state them misleadingly.

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27. All such statements you make should be backed up by evidence of calculations, to avoid you losing credibility.

### Community benefits, and compensation

28. The display boards for the windfarm state that Bute Energy has committed to invest £7,500 per megawatt (MW) of generating capacity for its energy parks into a Community Benefit Fund, which could mean an annual fund in the region of £1,237,500.

29. No community benefits appear to be being offered for the pylon line, though. There should be an offer of an equivalent scheme for those affected by the pylon line, too, in view of the fact that Llyn Lort and the Vyrnwy Frankton Connection are inextricably interlinked.

30. Superficially, the community benefit sounds generous. However, it is impossible to tell whether it is proportionate or just, without knowledge of the overall revenue likely to be generated per MW of generating capacity, and the likely dividends payable. Some indication of that should be made available during any future consultation.

31. The consultation material should make it clear that community benefits cannot be taken into account in deciding whether or not planning permission is issued. The 2019 Supreme Court judgment in *R (Wright) v Resilient Energy Severndale and Forest of Dean District Council* (2019 UKSC 53) is specific that community benefits cannot be taken into account in determining a proposal for wind turbines.

32. Community benefits can be seen as a blanket approach to mollify Local Councils (in England, or Community Councils in Wales). They do not necessarily provide any compensation or benefit to those persons who are directly disadvantaged by the proposals.

33. Firstly, compensation should be provided to individuals who are directly disadvantaged by the proposals, in addition to any community benefits. At the time of the earlier National Grid Mid Wales Connection proposals, it was evidenced that some properties lost value because of their proximity to the proposals. Clearly the owners of such properties deserve to be compensated by those promoting such proposals.

34. Secondly, communities should be able to choose what benefits they wish to take, rather than being offered a restrictive menu of possibilities.

35. In the case of the Llyn Lort proposal, some properties have become an enclave within the overall red-line boundary, at least one of which has a disabled occupant. Such properties should be bought out by the promoters of the scheme at full independently assessed market value.

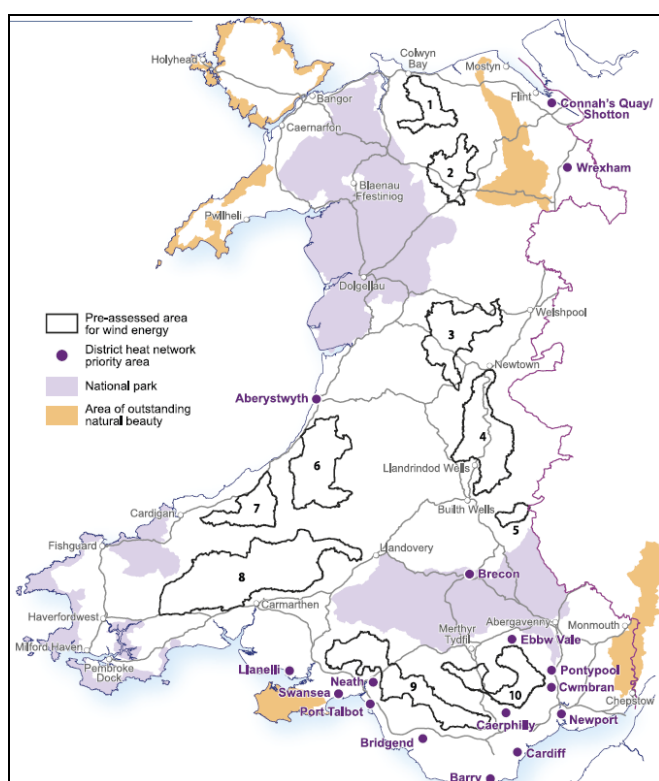
36. A major community disbenefit will be the disruption caused during the construction of the windfarms and the pylon line. The consultation material should have given some indication of the likely extent and duration of this disruption.

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## Choice of site for Llyn Lort wind farm

37. There is no clear explanation of why the Llyn Lort site in particular was chosen.
38. It would have been helpful to have seen how the site fits in with the Pre-Assessed Areas for Wind Energy in the Welsh Government's *Future Wales – The National Plan 2040*, as shown further below.
39. For any areas falling outside any of those Pre-Assessed Areas for Wind Energy, Policy 18 requires it to be demonstrated that the proposal does not have an unacceptable adverse impact on the surrounding landscape.
40. It does appear that four of the proposed Bute Energy energy parks do indeed fall outside these Pre-Assessed Areas for Wind Energy and that it is only the Llyn Lort site that falls within one of those areas (Area 3).



41. It would also have been helpful, for considerations of in-combination impact, to have been given information about other wind farms already in the pipeline. The fact that only Bute Energy schemes are mentioned in the consultation literature is somewhat disingenuous.
42. The Llyn Lort site appears to be solely for wind turbines, so again, it is somewhat misleading to describe it as an Energy Park.

## Choice of route corridor for the Vyrnwy Frankton Connection

43. Your choice of route corridor appears to have been a desk-top exercise, without any physical surveys having been carried out. Paragraph 100 of the Green GEN Phase 2 Grid

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Connection Strategy indicates that the factors applied were only Environmental (the AONB, and designated ecological and cultural heritage sites), Technical, Cost and Deliverability.

44. This does not appear to have taken into account the numbers of people likely to see, or be close to, the pylon line. The choice of route corridor ought to take into account the relative number of people so affected i.e. it should produce the least overall effect on sensitive receptors.
45. Visual blight, as well as proximity, are the chief reasons people object to pylons and overhead wires. The chosen route ought to minimise these effects. For instance, in section 5 of the preferred route, many people in elevated positions in Pant and Llanymynech will have clear views of the proposed pylon line.
46. Many people all along the route corridor are well aware of the previous similar proposals for a pylon connection to Lower Frankton from a collector substation near Cefn Coch, as put forward by National Grid in their Mid Wales Connection proposals (first launched in March 2011). These had reached an advanced stage (including showing the proposed positions of pylons) before they went into “hibernation” in September 2015.
47. It was notable that the NG MWC consultation process offered a number of different options for route corridors before deciding on a preferred route, whereas you have plumped for a preferred route corridor from the outset.
48. It would therefore have been helpful had you set out why your methodology differed from that used for the NG MWC, why you now prefer a route on a slightly different alignment, and how that compares with the preferred NG MWC. A lot of people went through considerable heart ache at the time of the NG MWC, including as a result of the approach of the agents for that scheme, and it would have been helpful to have seen what changes to it are now proposed, and why.
49. Your proposed route corridor passes right by some properties which the NG MWC also proposed to pass very close to. As the owners of those properties were caused unnecessary worry by those inconsiderate proposals, it is disappointing that you seem to be making the same mistake by relying on a desk-top study.
50. It is to be hoped that you will consult face-to-face with owners of those properties that are within the 150m ‘trigger for consideration’ zone and will at least offer them appropriate compensation if the eventual pylon line cannot be accommodated elsewhere.

## Undergrounding

51. One big difference between your scheme and the NG MWC proposals is that NG offered a long stretch of undergrounding along the Meifod valley. Why is no undergrounding whatsoever being proposed in your scheme?
52. The chief objection to pylons is their visual effect, which would entirely be allayed if the connection were placed underground.

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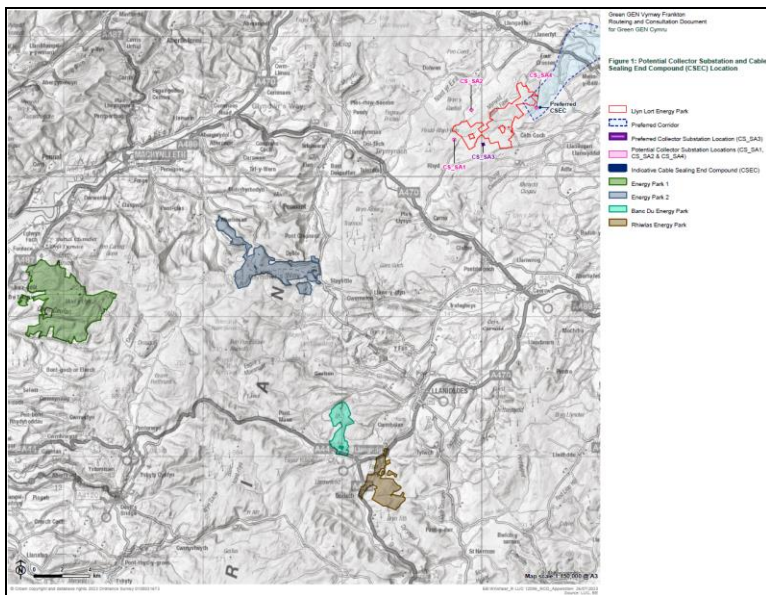
53. The chief objection to undergrounding is cost. The relatively new technology of Cable Trenching appears to offer some solution to this, and all efforts should be pursued to see whether Cable Trenching could be used for the Vyrnwy Frankton Connection.

### Choice of site for collector sub-station near Cefn Coch

54. At the time of the NG MWC proposals there were also proposals for Scottish Power Energy Networks 132kV connections from various proposed windfarms to the proposed collector hub near Cefn Coch.

55. The proposals you are putting forward appear to be that the collector substation near Cefn Coch should serve only or mainly Bute Energy windfarms or energy parks. That seems to be wasteful of resources when there are other nearby windfarms that might benefit from being able to make use of such a substation and connection. I am told that there are about 570MW of windfarms, either passed or in planning, that might hope to make use of a hub near Cefn Coch for their connection to the grid. Why have you not teamed up with these other windfarms in a joint scheme, and why have you not collaborated with existing District Network Operators rather than seeking to be a new DNO in your own right? On the face of it the reasons appear to be for the sole benefit of Bute Energy rather than for altruistic reasons of minimising carbon emissions. That in turn implies that profit is the primary motive.

56. This is particularly the case when some of the Bute energy parks you propose to be connected to the collector substation are well to the west, nearly at the Welsh coast, as shown below. That means many more miles of connections to connect them to the substation.



57. It would have been helpful to have supplied more information about the Banc Ddu and Rhiwlas energy parks, as they appear to be more advanced than the unnamed Energy Parks 1 and 2.

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58. As stated above, it does appear that Banc Ddu, Rhiwlas and Energy Parks 1 and 2 all lie outside Pre-Assessed Areas for Wind Energy. There is therefore more doubt as to whether they will be granted planning permission. That doubt alone means that it might be more sensible in the overall scheme of things to allow windfarms that are already well through the planning system to hook up to the proposed collector substation near Cefn Coch.

### Climate change and energy supplies

59. If the UK is to meet its carbon reduction targets then, at the moment, renewable energy has an important role to play. It may also help with energy security. However, its deployment is, at the moment, unlikely to make any difference to the UK's climate, which is determined by wider global factors.

60. Renewable energy also has the disadvantage of being intermittent and of low thermal density. Its requirements for materials to construct it are much higher per unit of output than conventional sources, including nuclear. These factors, which have a bearing on the use and exploitation of the earth's resources, should be calculated and made plain in any consultation. The concentration on climate change reduction, whilst being a worthy altruistic aim, may not be the whole story.

61. The intermittency, as well as current lack of grid connections, means that many more pylon lines will be required in the UK, not just in Wales.

62. You ask whether *"more renewable energy generation in Wales would make us less reliant on imported energy and help to guarantee secure energy supplies for Wales and England in the future"*. That might be so were it not for the fact, as set out above, that the electricity to be generated from the proposed five Bute Energy energy parks is planned to be exported wholly to England along the proposed Vyrnwy Frankton Connection. Wales will receive little benefit by re-importing the electricity from the UK national grid.

63. It would have been more altruistic of Bute to have devised some means whereby the local electricity circuits could have been strengthened, so that the local network received direct benefit.

### Overall

64. It is perhaps understandable that Bute Energy should seek to put the best spin into its consultation material, and major on its own projects rather than collaborating with others in the cross-national UK interest. However, greater credibility would have been gained by being more open with basic information about the electricity and renewable energy networks in mid Wales, and about already existing proposals in the area.

Yours sincerely

*Charles Green*

*On behalf of CPRE Oswestry District*

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