

DNS: EIA Scoping Direction
CAS-02379-G1Z1J0
Green GEN Towy-Usk Project

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This Scoping Direction is provided on the basis of the information submitted to Planning and Environment Decisions Wales on 17 October 2023, in addition to consultation responses received. The advice does not prejudice any recommendation made by an Inspector or any decision made by the Welsh Ministers in relation to the development, and does not preclude the Inspector from subsequently requiring further information to be submitted with the submitted DNS application under Regulation 24 of [The Town and Country Planning \(Environmental Impact Assessment\) \(Wales\) Regulations 2017](#) (as amended) (“The 2017 Regulations”).

1. Introduction

Planning and Environment Decisions Wales (PEDW) received a request under [Regulation 33](#) of the 2017 Regulations for a Scoping Direction in relation to a proposed development for a 132 kV overhead line connection from the proposed Nant Mithil Energy Park to a proposed new substation near Carmarthen by Green GEN Cymru Ltd.

The request was accompanied by a Scoping Report (SR) that outlines the proposed scope of the Environmental Statement (ES) for the proposed development:

2023-10-17 - EIA Scoping Request - Scoping Report and Appendix D part 1 and 2, available via the Planning Casework Portal - <https://planningcasework.service.gov.wales/> and search **CAS-02379-G1Z1J0**

Planning and Environment Decisions Wales (PEDW) is authorised to issue this Scoping Direction on behalf of the Welsh Ministers.

This Direction has been prepared in accordance with the requirements of the 2017 Regulations as well as current best practice towards preparation of an ES. In accordance with the 2017 Regulations PEDW has consulted on the SR and the responses received from the consultation bodies have been duly considered in adopting this Direction.

2. Site Description

The site is located within Powys County Council and Carmarthenshire County Council and is approximately 96 km in length. It commences approximately 10 km to the north-east of Llandrindod Wells at the proposed Nant Mithil Energy Park substation, heads broadly south-west entering the Towy valley and passing to the north of Llandovery and Llandeilo, before crossing the A48 and terminating approximately 6 km south of Carmarthen.

Further information is available in sections 1.23 – 1.25 of the SR.

3. Proposed Development

The proposal as described in the SR is for a 132 kV overhead line (OHL) connection from the proposed Nant Mithil Energy Park to a proposed new substation near Carmarthen. In addition to the proposed steel towers supporting the OHL conductors, temporary ancillary development will be required to facilitate the construction of the OHL, including working areas around towers, temporary access tracks, winching / pulling areas and construction compounds / laydown areas.

A Switching Station is likely to be required between the Nant Mithil Energy Park and Builth Wells.

Further information is available in chapter 3 of the SR.

The scope of the EIA should include all elements of the development as identified in the SR, both permanent and temporary, and this Scoping Direction is written on that basis.

In line with the requirements of [Regulation 17](#) and [Schedule 4](#) to the 2017 Regulations, any reasonable alternatives considered should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

4. History

No site history is provided in the SR, although it notes that the Project traverses a wide range of land uses.

5. Consultation

In line with [Regulation 33\(7\)](#) of the 2017 Regulations, formal consultation was undertaken with the following bodies:

- Carmarthenshire County Council (CCC)
- Powys County Council (PCC)
- Transport Directorate, Welsh Government
- Agricultural Land Use & Soil Policy, Welsh Government
- Cadw
- Natural Resources Wales (NRW)
- Health and Safety Executive (HSE)
- Dŵr Cymru
- Hafren Dyfrdwy
- Mid And West Wales Fire and Rescue Service
- Network Rail
- Transport for Wales

Additional consultation was undertaken with:

- Bannau Brycheiniog National Park Authority (BBNPA)
- Woodland Trust

Responses received are included in **Appendix 1**.

PEDW also received a submission from Llanarthne Area Community Pylon Group.

6. Environmental Impact Assessment Approach

The Applicants should satisfy themselves that the ES includes all the information outlined in [Schedule 4](#) of the 2017 Regulations. In addition, the Applicant should ensure that the Non-Technical Summary includes a summary of all the information included in Schedule 4. Consider

a structure that allows the author of the ES and the appointed Inspector and Decision Maker to readily satisfy themselves that the ES contains all the information specified [Regulation 17](#) and Schedule 4 of the 2017 Regulations. Cross refer to the requirements in the relevant sections of the ES, and include a summary after the Contents page that lays out all the requirements from the Regulations and what sections of the ES they are fulfilled by.

As the assessments are made, consideration should be given to whether standalone topic chapters would be necessary for topics that are currently proposed to be considered as part of other chapters, particularly if it is apparent that there are significant effects and a large amount of information for a particular topic.

There may also be topic areas scoped out of the ES where the developer may wish to include application documents that sit outside of the ES and provide information that will support their consultation(s) and the decision-making process. The developer is encouraged to liaise with key consultees regarding non-ES application documents which are not a legislative requirement of the DNS regime. If agreement cannot be reached over non-ES application documentation, then the developer may wish to explore whether PEDW can help provide clarity via its statutory pre-application advice service.

The ES should focus on describing and quantifying significant environmental effects. Policy considerations / arguments relating to those impacts should be addressed in other documentation supporting the application (e.g. a Planning Statement), which cross references the ES where necessary. This does not imply that ES chapters should not be prepared in accordance with relevant advice in policy documents (e.g. Technical Advice Notes), rather that the ES should concentrate on identifying significant effects on the environment rather than dealing with policy arguments or exhaustively listing policies.

6.1 Baseline

[Schedule 4](#) of the 2017 Regulations states that the 'baseline scenario' is "A description of the relevant aspects of the **current** state of the environment" (emphasis added). The baseline of the ES should reflect actual current conditions at that time.

6.2 Reasonable Alternatives

In line with the requirements of [Regulation 17](#) and [Schedule 4](#) to the 2017 Regulations, any reasonable alternatives studied by the Applicant should be presented in the ES. The reasons behind the selection of the chosen option should also be provided in the ES, including where environmental effects have informed the choices made.

It is worth bearing in mind that under the [Conservation of Habitats and Species Regulations 2017](#) ("the Habitats Regulations") unless it can be clearly shown to the Welsh Ministers that the project would have no adverse effect on the integrity of any designated sites, it would have to be shown that there is no feasible alternative solution (see advice note from [IEMA](#)). Further advice regarding the Habitats Regulations is provided in the final chapter of this Scoping Direction.

6.3 Currency of Environmental Information

For all environmental aspects, the applicant should ensure that any survey data is as up to date as possible and clearly set out in the ES the timing and nature of the data on which the assessment has been based. Any study area applied to the assessments should be clearly

defined. The impacts of construction, operation and decommissioning activities should be considered as part of the assessment where these could give rise to significant environmental effects. Consideration should be given to relevant legislation, planning policies, and applicable best practice guidance documents throughout the ES.

The ES should include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters. Where professional judgement has been applied this should be clearly stated.

The ES topic chapters should report on any data limitations, key assumptions and difficulties encountered in establishing the baseline environment and undertaking the assessment of environmental effects.

6.4 Cumulative Effects

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – [Advice Note 17: Cumulative Effects Assessment](#) sets out a staged process for assessing cumulative impacts which the Applicant should follow when preparing the list of projects for inclusion in the ES; the Applicant should ensure that relevant schemes identified are addressed in the ES using the tiered approach set out in Advice Note 17.

Based on the information set out in the scoping request, the approach to the assessment of cumulative impact is considered largely appropriate. Effects deemed individually not significant from the assessment, could cumulatively be significant, so inclusion criteria based on the most likely significant effects from this type of development may prove helpful when identifying what other developments should be accounted for. The criteria may vary from topic to topic.

Best practice is to include proportionate information relating to projects that are not yet consented, dependent on the level of certainty of them coming forward.

All of the other developments considered should be documented and the reasons for inclusion or exclusion should be clearly stated. Professional judgement should be used to avoid excluding other development that is close to threshold limits but has characteristics likely to give rise to a significant effect; or could give rise to a cumulative effect by virtue of its proximity to the proposed development. Similarly, professional judgement should be applied to other development that exceeds thresholds but may not give rise to discernible effects. The process of refinement should be undertaken in consultation with the Local Planning Authorities, Cadw, NRW and other consultees, where appropriate.

The scope of the cumulative assessment should be fully explained and justified in the ES.

6.5 Mitigation

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured (through legal requirements or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

6.6 Population and Human Health

The Applicant should ensure that the ES addresses any significant effects on population and human health, in light of the EIA Regulations 2017. This could be addressed under the separate topic chapters or within its own specific chapter.

6.7 Transboundary Effects

[Schedule 4 Part 5](#) of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The ES should address this matter as appropriate.

6.8 Topics Scoped In but not subject to a standalone chapter

For such topics it may be helpful to users of the ES if it includes a summary table that signposts the chapters where these matters are addressed.

7. Environmental Impact Assessment Aspects

This section contains PEDW's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. Environmental topics or features are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by PEDW. In accordance with Regulation 17(4)(c) the ES should be based on this Scoping Direction in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

PEDW has set out in this Direction where it has/ has not agreed to scope out matters on the basis of the information available at this time. PEDW is content that the receipt of a Scoping Direction should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

7.1 Aspects Scoped In

Subject to the comments provided at Table 1, the following aspects are scoped into the ES:

- Climate Change (not as a standalone chapter)**
- Health and Wellbeing (not as a standalone chapter)**
- Decommissioning**
- Landscape and Visual Amenity**
- Biodiversity (incl. decommissioning and operational impacts where appropriate)**
- Historic Environment**
- Traffic and Transport (incl. Common Land)**
- Noise and Vibration (incl. operational noise)**
- Water Resources (incl. construction impacts where appropriate)**
- Ground Conditions, Geology and Hydrogeology (incl. climate change)**
- Soil and Agriculture**

Air Quality

Cumulative Effects

Material Assets and Waste (not necessarily as a standalone chapter)

8. Table 1: Planning and Environment Decisions Wales Comments

ID	Reference in Scoping Report	Issue	Comment
General			
ID.1		Description of development	The Applicant's attention is drawn to comments from NRW contained at Appendix 1 outlining their expectations regarding the content of the description of the development in the Environmental Statement (ES).
ID.2		Illustrations	The Applicant's attention is drawn to comments from NRW stating that any maps, drawings and illustrations that are produced to describe the development should be designed in such a way that they can be overlaid with drawings, illustrations and aerial photographs produced for other sections of the ES such as biodiversity.
ID.3	2.14	Reasonable alternatives	<p>PEDW welcomes that the Scoping Report (SR) states that the ES will include a description of the process followed to identify and develop the route and final design of the grid connection, including reasons for the selection of the final design. The ES will need to include a robust rationale for the selection of overhead and / or underground cabling, with appropriate assessment of alternatives. The Applicant's attention is drawn to section 6.2 above.</p> <p>The Applicant's attention is also drawn to comments from Llanarthne Area Community Pylon Group highlighting their concerns regarding the assessment of alternative routes, methods and technologies (including associated carbon footprints). PEDW recommends the Applicant liaises directly with the Group to address their concerns.</p>
ID.4	3.10 – 3.16	Underground Cabling Infrastructure	PEDW notes the SR states undergrounding may be considered in certain locations and that the SR acknowledges that the undergrounding of cable

ID	Reference in Scoping Report	Issue	Comment
			infrastructure, whilst reducing visual impacts, generates additional impacts due to ground disturbance. It is welcomed the SR states any proposals for undergrounding will include a detailed consideration of the likely significant effects. PEDW recommends the Applicant consults with the relevant stakeholders including Local Planning Authorities (LPAs), NRW and Cadw to ensure any likely significant effects from proposed undergrounding are proportionately addressed in the ES. PEDW also recommends the rationale in relation to whether or not to adopt undergrounding is clearly outlined in the ES.
Applicant's aspects proposed to be scoped out			
ID.5	6.4 – 6.14	Electric and Magnetic Fields (EMF)	<p>PEDW notes the SR states that this topic will be scoped out, but a separate document will be submitted with the application. PEDW is content with this approach, but draws the Applicant's attention to the following comments contained at Appendix 1.</p> <p>CCC notes compliance with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and highlights there may be consequential impacts from electro-magnetic forces, such as phone and broadband signal that affect amenity.</p> <p>PCC states that the Applicant should demonstrate that the proposal meets the requirements of the ICNIRP RF EMF Guidelines 2020.</p>
ID.6	6.23	Climate Change	The Applicant's attention is also drawn to comments from NRW, noting consideration of Climate Change will be given within relevant topic chapters, but highlighting climate change considerations do not appear to have been considered within the Chapter on Ground Conditions. This is further addressed below under Ground Conditions, Geology and Hydrogeology.

ID	Reference in Scoping Report	Issue	Comment
			PEDW agrees that this topic should be addressed in appropriate chapters of the ES and a standalone chapter is not required, as indicated in the SR. Climate Change is therefore scoped in to the ES, but not as a standalone chapter.
ID.7	6.24 – 6.27	Health and Wellbeing	<p>The Applicant's attention is drawn to comments from PCC highlighting Countryside Services' advice that the proposals may impact on outdoor recreation opportunities within the site and that Public Rights of Way (PRoW) make a significant contribution to the health and wellbeing of residents and visitors to Powys. PCC states this must be considered in relation to health and wellbeing, whether incorporated into a separate chapter, which would be PCC's preference, or into other relevant chapters.</p> <p>PEDW agrees that this topic should be addressed in appropriate chapters of the ES and a standalone chapter is not required, as indicated in the SR. Health and Wellbeing is therefore scoped in to the ES, but not as a standalone chapter.</p> <p>NRW states the applicant may wish to include reference to the Well-being of Future Generations (Wales) Act 2015. PEDW advises that, whilst it is not a statutory validation requirement, it may be helpful if the application is accompanied by a 'self-assessment' against the Ways of Working laid out in the Well-being of Future Generations (Wales) Act 2015. This can help lead to a more effective examination. Guidance on the Ways of Working is available online: https://www.futuregenerations.wales/about-us/future-generations-act/</p>
ID.8		Major Accidents and Disasters	The Applicant's attention is drawn to comments from HSE stating that given the extensive area of development, there are sections of the proposed development that fall within HSE public safety consultation zones associated with Major Accident Hazard Pipelines and Major Accident Hazard Installations.

ID	Reference in Scoping Report	Issue	Comment
			PEDW welcomes the SR states that a comprehensive risk management framework will be applied during construction and operation phases and PEDW agrees this topic can be scoped out.
ID.9		Socio-Economics	PEDW agrees that this can be scoped out and welcomes the Applicant's intention to present socio-economic information in a stand-alone document to be submitted with the DNS application.
ID.10	6.44 – 6.45	Decommissioning	<p>PCC in their comments contained at Appendix 1 notes that decommissioning has been scoped out, but states this should be considered in relevant chapters.</p> <p>The Applicant's attention is drawn to comments from NRW regarding decommissioning, recommending it is not assumed that conditions during proposed activities will remain the same as they currently are. Conditions across the route of the OHL and in relation to any below ground activities may have changed as a result of climate change and be subject to more extreme weather events.</p> <p>PEDW agrees with these comments. The ES should be based on a worst-case scenario and as the SR states the OHL may be fully decommissioned when its operational life ends (assumed to be 80 years), decommissioning should be explored in a proportionate manner in the ES. At a minimum, the ES should clearly indicate how decommissioning of the site will take place, clearly indicate what will be left on site and what will be removed. The ES should address what the end of life cycle will be for the infrastructure on site. Therefore decommissioning is scoped into the ES in a proportionate manner.</p>

ID	Reference in Scoping Report	Issue	Comment
Landscape and Visual Amenity			
ID.11	7.4 – 7.7	Study Area	<p>PEDW notes more distant visual receptors and representative viewpoints up to 5 km from the proposed development will be considered where there is the potential for significant visual effects beyond the Landscape and Visual Assessment (LVIA) study area. PEDW welcomes the statement that such viewpoints will be agreed with consultees.</p> <p>The Applicant's attention is drawn to comments from CCC stating the provisional LVIA study area is considered acceptable and highlighting Zone of Theoretical Visibility (ZTV) mapping should fully inform the final LVIA study area and additional sensitive receptors and viewpoints. CCC requests that the proposed wider consideration of extensions to the study area as set out in paragraph 7.7 of the Scoping Report be fully enacted. NRW also highlights that the final study area will depend on the extent of landscape that is likely to be impacted and should be informed by evidence, including ZTV analysis and fieldwork.</p> <p>NRW highlights the following guidance on appropriate search and study areas: NRW Guidance Note 46: Using LANDMAP in Landscape and Visual Impact Assessments</p> <p>In relation to the recommended search and study areas of vertical structures, NRW highlights that the scale of the corridor is such that a precautionary approach should be used, particularly with regards to the inclusion of land within Bannau Brycheiniog National Park (BBNP). NRW notes that it is intended to include viewpoints up to 5 km from the project and adds that if significant impacts are anticipated within 5 km of the project, then the final study area should reflect this.</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>The Applicant's attention is also drawn to comments from BBNPA regarding the impact on the special qualities and setting of the National Park, raising concern whether the scale and size of the scoping corridor and buffer zone is sufficient to assess the potential significant impact on the National Park. They highlight the study area must include key views from within the National Park and that the 3 km buffer might need to be extended to accommodate the potential long-distance views from within the park boundary.</p> <p>PEDW recommends the Applicant liaises directly the LPAs, BBNPA and NRW regarding the final study area and the rationale for this should be clearly outlined in the ES.</p>
ID.12	7.31 / 7.45	Receptors beyond 3 km	<p>NRW notes that the SR states that receptors beyond 3 km will be scoped out, with the exception of 'very high sensitivity receptors up to 5 km from the Project'. They also note that paragraph 7.31 states the LVIA will not record sensitivity judgements greater than high. NRW therefore assume receptors beyond 3 km which have high sensitivity will be included. They add that in general visual receptors visiting hill summits within the BBNP will have a high sensitivity and therefore potential impacts at hill summits within 5 km of the Project should be carefully considered.</p> <p>PEDW recommends the Applicant liaises directly with NRW if this assumption is incorrect and ensures that the approach is clearly explained in the ES.</p>
ID.13	7.24 / 7.38	Viewpoints	<p>In reference to the SR referring to likely up to 30 representative viewpoints, CCC states that sufficient appropriate viewpoints should be included to fully address the nature and extent of landscape and visual impacts. CCC advises that detailed scoping of all settlements within the ZTV be undertaken, and appropriate representative viewpoints be included, with a robust justification for scoping out a settlement, to be agreed by consultees. CCC also requests that</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>appropriate representative viewpoints from the proposed Tywi Valley Path be included and agreed by consultees.</p> <p>The Applicant's attention is also drawn to comments from NRW regarding the preliminary LVIA viewpoints. NRW advises that one viewpoint from within the BBNP is unlikely to be sufficient to represent the range of views available from the western parts of the BBNP. BBNPA in their response states they would welcome discussion on potential viewpoints to be included within the LVIA, to determine whether the proposal would have a significant visual and landscape effects. They add that the final selection of viewpoints will need to be informed by ZTV analysis and potentially preliminary wireframes.</p> <p>NRW highlights that Dyffryn Tywi will likely be one of the most sensitive sections of the project, where undergrounding may be deemed necessary. They acknowledge that should undergrounding occur, the need for some viewpoints may be negated.</p> <p>PEDW welcomes the SR states the viewpoint list will be built upon and / or amended following ZTV analysis and further engagement with consultees. Paragraph 7.38 specifically mentions PCC, CCC and NRW. PEDW recommends the Applicant also engages with BBNPA regarding this matter.</p>
ID.14	7.30 / 7.38 – 7.39	Visualisations	<p>The Applicant's attention is drawn to comments from NRW regarding visualisations. NRW highlights it is not clear which viewpoints will be used for the preparation of visualisations and would welcome the opportunity to review draft locations in advance of preparation.</p> <p>PEDW recommends the Applicant liaises directly with NRW regarding this matter and advises the agreed approach is clearly outlined in the ES.</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>NRW in their comments also advises that Figures 7.9 a-e: “Visual Receptors and Preliminary Viewpoint Locations” are difficult to read and future versions should be of a higher resolution and / or split across more pages, with all showing the BBNP boundary.</p> <p>NRW welcome the proposed approach to undertake field surveys in both summer and winter months and the intention for all viewpoint photography to be captured when trees are not in leaf.</p> <p>BBNPA in their response at Appendix 1 highlight the need for visualisations regarding lighting and the impact on the Dark Sky Reserves.</p>
ID.15		Landscape Assessment	<p>The Applicant’s attention is drawn to comments from CCC stating it considers that the proposed approach and scope for the assessment of effects on landscape character generally acceptable, pending consideration of the CCC Landscape Character Assessment (currently being prepared) and Landscape Institute Technical Guidance Note 02/21: Assessing landscape value outside national designations.</p> <p>The Applicant’s attention is also drawn to NRW’s recommendations regarding the landscape character assessment, agreeing a project specific local landscape character assessment is likely most appropriate.</p>
ID.16		Visual Assessment	<p>The Applicant’s attention is drawn to comments from CCC and NRW regarding the approach and scope for the assessment of visual effects. CCC consider this generally acceptable, with some additions. CCC advises that the road network is often used as a recreational resource providing links between sections of the PRoW network and requests these users are considered as highly sensitive receptors within the visual baseline. NRW is satisfied with all receptors beyond 5 km from the Project and receptors falling outside of the ZTV being scoped out</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>of the LVIA. They note that it is proposed to scope in effects on views experienced by walkers and cyclists and state they expect the scope will capture the most sensitive visual receptors within BBNP and its setting.</p> <p>CCC also requests that the assessment methodology addresses the full range of potential visual impacts, including those arising in combination from one (static) viewpoint, in succession from one (static) viewpoint, and sequential effects on a journey. NRW concurs that the assessment of impacts on users of promoted and recreational routes should describe the sequential impacts which would occur along affected sections.</p>
ID.17	7.34 – 7.37	Residential Visual Amenity Assessment (RVAA)	<p>NRW advises the appropriate guidance is referenced in the SR regarding the preparation of the RVAA.</p> <p>The Applicant's attention is drawn to comments from CCC regarding the RVAA. CCC considers the assessment radius of 150 m to be premature and advises separation distances should be subject to a robust and justified appraisal prior to establishing a study area to individual properties. CCC requests that the proposed study area is agreed with them prior to commencement of any RVAA.</p> <p>CCC advises the separation distance of individual structures from residential properties is maximised through detailed design work. CCC adds that the SR does not provide commentary on the proximity of the overhead line alignment to residential properties and advises an appropriate design phase separation constraint is considered as part of the detailed design.</p> <p>CCC also highlights that the SR does not address the construction phase impacts arising from the installation of any underground sections and advises these impacts should be fully assessed as part of the RVAA, including mitigation proposals as part of residual impact assessment.</p>

ID	Reference in Scoping Report	Issue	Comment
			PEDW recommends the Applicant liaises directly with CCC to address their concerns and agree the assessment approach and study area to ensure this is appropriately addressed in the ES.
ID.18	7.18 / Table 7.2 / 2.8	BBNP	<p>BBNPA notes that indirect effects on the special qualities of the BBNP have been scoped in. BBNPA outlines their areas of concern in relation to the impact on the special qualities of the National Park and adds that full consideration of the special qualities in the context of landscape and visual effects will be required and should be given appropriate weight. BBNPA disagrees with the statement at paragraph 2.8 of the SR that other environmental and technical constraints and effects need to be taken into account alongside and balanced with, landscape and visual effects. They highlight the Sandford Principle as outlined in PPW stating where there is a conflict between these purposes, greater weight shall be given to conserving and enhancing natural beauty, wildlife and cultural heritage.</p> <p>BBNPA notes that the SR references the Bannau Brycheiniog National Park Management Plan 2010-2015. However, BBNPA highlights the new Management Plan 'Future Bannau' 2023 – 2028' has been adopted.</p> <p>The Applicant's attention is further drawn to NRW's comments regarding impacts on the BBNP and that the assessment must be informed by a detailed consideration of supporting evidence. NRW cautions against an assessment approach based on an aggregate of all special qualities as this can lead to impacts on individual special qualities being missed or underestimated and states that special qualities should be assessed individually.</p>
ID.19		Underground cabling (UGC)	The Applicant's attention is drawn to comments from BBNPA regarding underground cabling, requesting consideration is given to UGC in areas where, based on evidence, the OHL will have a significant effect on the National Park

ID	Reference in Scoping Report	Issue	Comment
			<p>and its setting. In those areas which are deemed significantly sensitive underground cabling would be preferred.</p> <p>The Applicant's attention is also drawn to comments from Llanarthne Area Community Pylon Group regarding alternative undergrounding techniques and referencing PPW paragraph 5.7.9 that the Welsh Government's preferred position on new power lines is that, where possible, they should be laid underground.</p> <p>PEDW notes the SR states undergrounding may be considered in certain locations and refers the Applicant to the comments in relation to underground cabling as part of the General section above.</p>
ID.20	7.25 – 7.26	Cumulative effects	<p>NRW confirms they are content with the general approach for the cumulative assessment.</p> <p>CCC highlights the SR lacks detail of the schemes to be included within the cumulative assessment. They request that the methodology for assessment and identification of developments, to be considered as part of the cumulative landscape and visual impacts assessment, be agreed with consultees.</p> <p>The Applicant's attention is drawn to comments from BBNPA regarding cumulative effects, expressing concerns about cumulative impact and large development on the National Park boundary. They state further detailed cumulative impact on the National Park Boundary should be considered, with in combination effects identified and reported in the ES.</p> <p>PEDW recommends the Applicant liaises directly with the LPAs, BBNPA and NRW to agree the approach to the cumulative assessment, which should be clearly outlined in the ES.</p>

ID	Reference in Scoping Report	Issue	Comment
Biodiversity			
ID.21	8.3	Study Area	<p>Regarding field studies, CCC queries whether the inclusion of bird flight activity within 500 m is sufficient. They also add that any mature, veteran or ancient trees should be avoided.</p> <p>PCC in their response states the study area needs to include areas of the transport route that will be impacted to establish the development.</p> <p>BBNPA expresses concern that the scoping corridor does not fall within the boundary of the BBNP, but acknowledges they would be unlikely raise specific ecological issues as NRW and LPA Ecologists would be best placed to advise on impacts within and adjacent to the corridor.</p>
ID.22	8.24 / Q8.1 / Q8.3	Data collation and Assessment Methodology	<p>NRW notes that the SR does not appear to have a section referring to collection and assessment of data regarding Statutory Designated Sites and query whether this will therefore fall within the 'Data Collation and Assessment Methodology: Ecological' section on page 43 to 47.</p> <p>NRW also highlights that in section 8.24 there is no mention of using the NRW dataset Phase 1 maps to detect potential Section 7 Priority Habitat. They add they also have Phase 2 datasets for grassland, woodland, peatland, and heathland that can be used to inform the OHL location within the scoping corridor. NRW adds that in addition to using the unified peat layer on DataMapWales for potential deep peat locations, Phase 1 should also be used to detect areas of deep peat not on that GIS layer. NRW also advises the Applicant of a number of other data sources</p> <p>Regarding data sets that could inform the assessment, CCC recommend the Applicant consults West Wales Biodiversity Information Centre.</p>

ID	Reference in Scoping Report	Issue	Comment
			On this matter, PCC states consideration of species and habitats identified within the Powys Nature Recovery Action Plan would ensure locally important species and habitats can be appropriately accounted for and net biodiversity loss can be avoided - https://en.powys.gov.uk/article/2573/Powys-Nature-Recovery-Action-Plan . PCC also highlights that their interactive Constraints Map may be useful in identifying any key policy and designated site constraints.
ID.23	Q8.1	Scope of desk studies and ecological baseline surveys	<p>The Applicant's attention is drawn to the recommendation by NRW that referral to the NRW Lower Plant Specialist should be made to determine a low impact route through Dinefwr Deer Park, which is a site of Welsh importance for its lower plants (lichens) and also to the Invertebrate Ecologist for locations of trees with saproxylic interest.</p> <p>NRW further comments that a list of Groundwater Dependant Terrestrial Ecosystems (GWDTE) is needed as W9 woodland is considered to be a GWDTE and should not be omitted.</p>
ID.24	8.25	Surveys	<p>The Applicant's attention is drawn to comments from NRW regarding habitat and protected species surveys. NRW advises that any habitat surveys should accord with the NCC Phase 1 survey guidelines and be undertaken during the summer to ensure the best chance of identifying the habitats present.</p> <p>NRW queries whether the statement in section 8.25 that surveys will be conducted within the defined study area, concerns the entire corridor or checking of the current Phase 1 maps.</p> <p>NRW further advises on an assessment to determine the likelihood of protected species being present and likely to be affected by the proposals. NRW states targeted species surveys should be undertaken for all species scoped in and provides advice on how these should be undertaken and addressed in the ES.</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>NRW highlights that they largely concur with the protected species to be scoped in / out, but would also look to the extended Phase 1 habitat surveys to guide the need for any additional protected species surveys. NRW notes that targeted species surveys are proposed for badger, otter, red squirrel, pine marten, dormouse, and great crested newt.</p> <p>PEDW recommends the Applicant liaises directly with NRW regarding survey and assessment requirements, including the potential need for additional protected species surveys, following the extended Phase 1 habitat surveys.</p>
ID.25		Woodlands / Tree Felling	<p>NRW states that all areas of ancient woodland and especially Ancient Semi-natural woodland should be avoided as it is an irreplaceable resource.</p> <p>NRW also suggest that woodlands should be retained in the scope for a full assessment as the proposed 70 m wayleave potentially will have large impacts on woodland the OHL passes through.</p> <p>The Applicant's attention is also drawn to comments from PCC's Countryside Access and Recreation team, appended to PCC's main response at Appendix 1, regarding tree felling and potential adverse effects on PRow and access land.</p>
ID.26	8.3 / table 8.1	Statutory designated sites	<p>NRW agrees with the proposed buffers to assess likely significant effects on statutory designated sites and welcomes that buffers will be updated as the proposed design progresses.</p> <p>The Applicant's attention is drawn to NRW's comments stating there is limited information on how the assessment of statutory designated sites and their features within and outside the scoping corridor will be considered. NRW highlights that information regarding Sites of Special Scientific Interest (SSSIs) is limited. NRW states they are unable to make site specific comments as detail</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>regarding the location of the proposals is not available, but add that the scoping corridor may hold habitats of principle importance.</p> <p>PEDW recommends the Applicant liaises directly with NRW on this matter to provide the required clarification and ensure site specific detail is included as part of the ES.</p>
ID.27		Local biodiversity interests	The Applicant's attention is drawn to comments from NRW relating to biodiversity, recommending that the Applicant consults the LPA to ensure that regional and local biodiversity issues are adequately considered and that other relevant stakeholders are contacted for biological information / records relevant to the site and its surrounds.
ID.28		Protected Species	NRW highlights that, should protected species be found during the surveys, information must be provided identifying the species-specific impacts in the short, medium and long term together with any mitigation and compensation measures proposed. Where this concerns species which are also notified features of designated sites, they advise the impacts on those species from both perspectives is considered.
ID.29	8.27 - 8.34	Bats	<p>CCC confirms they consider the approach and scope for the assessment to be acceptable, provided that any mature, veteran, or ancient trees are avoided. If mature trees are affected, then CCC recommend a bat survey.</p> <p>NRW is unclear what the reference to 'detailed forestry and woodland surveys of woodland blocks' means in paragraph 8.28 of the SR, and would advise an assessment of the potential to support bats is undertaken.</p> <p>NRW recognises the need for a staged approach to surveys and advises the ES is initially supported by a minimum of static surveys of woodlands and likely</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>flight corridors to determine bat activity and species across the scheme, with a commitment to survey trees for potential roost features and climbing surveys to inform the final route selection. Where tree roosting features are likely to be impacted by the scheme, NRW advises that surveys include a climbed inspection of any trees identified as having medium / high potential roosting features.</p> <p>NRW also advises that an assessment of the potential impacts from clearing vegetation / habitats below the line is included in the ES, including measures to offset or manage this.</p>
ID.30	8.26	Dormouse	<p>The Applicant's attention is drawn to comments from NRW highlighting they are unclear about the scope the of the dormouse surveys. NRW advises that surveys are undertaken following published guidance and include more than one survey method, such as nest boxes, nest tubes and footprint tunnels.</p> <p>PEDW recommends the Applicant liaises directly with NRW to clarify the scope of the surveys and ensure this is appropriately outlined in the ES.</p>
ID.31	8.26	Otter	<p>NRW welcomes that specific surveys for otters are proposed. NRW advises that it is ensured that habitats are assessed for their potential to support breeding sites for this species and provides advice on the completion of the assessment.</p> <p>NRW also advises that from a Carmarthenshire Statutory Designated Sites perspective, otter surveys are undertaken to best practice guidelines to inform the proposed Habitats Regulations Assessment regarding the Afon Tywi Special Area of Conservation.</p>
ID.32	8.35	Great Crested Newt (GCN)	<p>The Applicant's attention is drawn to comments from NRW regarding GCN. NRW advises that eDNA surveys are also carried out for waterbodies within the</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>preferred corridor, rather than surveys relying on HSI data to determine the need for presence / absence survey.</p> <p>NRW adds that if the proposed development is within 250 m of a pond used by GCN, and the development cannot be designed to avoid the area, the eDNA survey should be followed up with a suite of traditional surveys to determine the population concerned as per the guidance set out in 'Great Crested Newt Mitigation Guidelines' by English Nature dated 2001.</p>
ID.33	8.36 / 8.88	Water vole	<p>PEDW notes the SR states water vole surveys are proposed to be scoped out as water vole activity is mostly restricted to areas immediately adjacent to river and stream banks, which should be spanned and remain unaffected. The SR states that should this assumption change, the need for water vole surveys will be revisited and a walkover for water vole signs will be included as part of the otter survey if required.</p> <p>Based on NRW's comments regarding inclusion of a walkover for water vole signs, PEDW advises a walkover survey for water vole signs should be included as part of the otter survey. If water vole signs are found, water vole should be scoped in the ES and the Applicant should liaise directly with NRW regarding the detail required for the ES.</p>
ID.34	8.88	Reptiles	<p>The SR states that reptiles are scoped out at construction and operation phases. CCC notes that reptiles may need to be scoped in depending on habitat.</p> <p>PEDW recommends the Applicant liaises directly with CCC regarding any potential impacts on reptiles depending on habitat, to check CCC agrees with the Applicant's position that there are no likely significant effects on this receptor. The outcome should be reported in the ES.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.35	8.21 - 8.22 / 8.69	Fish	<p>The Applicant's attention is drawn to comments from NRW regarding fish, outlining legislation and guidance to be included in paragraphs 8.21 and 8.22. NRW also adds that the proposed Construction Environmental Management Plan (CEMP) should specifically take account of biosecurity to avoid transmission of invasive species.</p> <p>NRW further states regarding sections 3.10 - 3.16 and section 3.30 of the SR that once method statements are available, road and underground cabling of watercourse crossings will need further consultation with NRW on the potential impacts to fish caused by disturbance, pollution, obstruction, or changes to habitat availability.</p> <p>PEDW recommends the Applicant liaises directly with NRW on these matters, ensuring this is appropriately addressed in the ES. The outline CEMP should be included as a technical appendix to the ES.</p>
ID.36	8.81	Ornithology	<p>NRW agrees that overall, the scope of the ornithological work is appropriate and recommend that the Vantage Point surveys follow NatureScot guidelines. NRW adds that details of collision risk assessment will be needed especially regarding Special Protection Area features. Although NRW agrees with the ornithological receptors that are scoped in, they recommend that operational phase is scoped-in in relation to protected sites at this stage.</p> <p>Based on their concerns, it is not appropriate to scope out operational impacts at this stage and impacts on ornithological receptors related to protected sites are scoped in for the operational phase. The Applicant should liaise with NRW over this matter, and if it can subsequently be shown that there will be no significant operational impacts, then this can be scoped out at that stage and a justification included in the ES.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.37	8.37 – 8.47	Impact assessment method	PEDW notes paragraph 8.45 of the SR states impacts will be considered during the construction and operational phases. The Applicant's attention is drawn to comments from NRW advising the EIA considers significance (both alone and in combination) and where applicable conservation status, referencing current conservation status and favourable conservation status during construction, operation and decommissioning phases. PEDW agrees that the decommissioning phase should also be considered in a proportionate manner, further to our comments regarding the scoping in of decommissioning above.
ID.38	8.74 – 8.75	Ecological effects scoped in to the Assessment	The Applicant's attention is drawn to comments from NRW welcoming aspects being scoped in to the assessment. They note that a separate HRA screening and Appropriate Assessment Report (if required) will be produced in parallel with the ES and state that the outcomes of these should be incorporated into the Environmental Impact Assessment. PEDW draws the Applicant's attention to section 9.2 below regarding HRA.
ID.39	8.76 – 8.77	Direct and indirect effects as a result of the operation of the project on statutory designated areas for nature conservation purposes	<p>NRW notes these effects are proposed to be scoped out of full assessment. However, NRW advises that the assessment retains the scope to consider the potential impacts upon sensitive ecological receptors until these receptors are screened out by consideration of desktop and field survey information for all phases of the proposal, including maintenance. They add that as more detailed information comes to light with regards to the proposal, its location and ecological surveys, the assessment of impacts may alter.</p> <p>PEDW recommends the Applicant liaises directly with NRW on this matter. It is therefore not possible at this stage to scope out operational impacts on statutory designated areas for nature conservation purposes and this is therefore scoped in. If, further to the outcome of surveys and discussions with</p>

ID	Reference in Scoping Report	Issue	Comment
			NRW, these operational effects can be scoped out, a robust rationale for this should be provided in the ES.
ID.40	8.76 – 8.77	Direct and indirect effects as a result of the operation of the project on non-avian protected and notable species	<p>NRW notes these effects are proposed to be scoped out of full assessment. For the same reasons as outlined in the point above, NRW advises that this remains in scope of the assessment.</p> <p>PEDW recommends the Applicant liaises directly with NRW on this matter. It is therefore not possible at this stage to scope out operational impacts on non-avian protected and notable species and this is therefore scoped in. If, further to the outcome of surveys and discussions with NRW, these operational effects can be scoped out, a robust rationale for this should be provided in the ES.</p>
ID.41		Mitigation / Compensation	<p>NRW welcomes the focus on avoiding direct impacts on sites designated for nature conservation purposes and significant impacts on protected species and habitats of conservation concern, as well as the inclusion of standard good practice mitigation measures outlined in section 8.69.</p> <p>The Applicant's attention is drawn to comments from NRW advising that the ES sets out how the long-term site security of any mitigation or compensation will be assured, advocating that where the potential for significant impacts on protected species is identified, a Conservation Plan is prepared as an Annex to the ES.</p>
ID.42	8.85 – 8.87	Benefit for Biodiversity	CCC highlights that they do not support the use of the Biodiversity Net Gain metric. They add that Net Benefit for Biodiversity should be assessed in terms of habitat losses and gains and be designed early in the scheme using PPW Chapter 6 guidance.

ID	Reference in Scoping Report	Issue	Comment
			The Applicant's attention is also drawn to comments from NRW advising the application should demonstrate how it can deliver biodiversity enhancements and thus contribute to promoting ecological resilience.
Historic Environment			
ID.43	9.6	Information sources	The Applicant's attention is drawn to comments from Clwyd-Powys Archaeological Trust provided as part of PCC's response at Appendix 1, providing a number of information sources to be consulted in addition to those listed in the SR.
ID.44	9.21	Legislation, Policy and Guidance	The Applicant's attention is drawn to comments from Cadw and from Clwyd-Powys Archaeological Trust, highlighting further documents to be considered.
ID.45	Q9.4	Approach to assessment	<p>Cadw and Clwyd-Powys Archaeological Trust agree that the approach to the assessment of effects, including those effects scoped in and out and the cumulative assessment, is appropriate.</p> <p>The Applicant's attention is drawn to comments from CCC stating they wish to see an individual assessment of the setting of designated assets within the study area for all listed buildings that are deemed to have a more than immediate setting, i.e. mainly those within the Tywi Valley.</p> <p>CCC adds that the setting of some heritage assets within the principal towns that would be affected and the Conservation Areas within those towns, in particular those with views over the Study Area, will need to be addressed. CCC suggests Cadw's (2017) Setting of Historic Assets in Wales guidance is used for these assessments and adds it may be prudent to complete an overview Heritage Impact Assessment and Statement for the area.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.46	9.25 – 9.26	Historic Environment Desk-based Assessment (HEDBA)	The Applicant's attention is drawn to comments from Clwyd-Powys Archaeological Trust, regarding the reporting of HEDBA and subsequent pre-application surveys.
ID.47		Surveys	<p>Further to the above, the Clwyd-Powys Archaeological Trust also provides further detail on additional studies and surveys supporting the HEDBA. This includes assessment of the impact on intact peat deposits which may contain important paleoenvironmental evidence and artefacts of prehistoric date, as well as geophysical survey followed by evaluation trenching in relation to any proposed underground cable sections and other locations. The Applicant's attention is also drawn to the Trust's comments regarding the timing of the survey window for cultural heritage assessment.</p> <p>The Applicant's attention is drawn to comments from Cadw regarding the approach to surveys, which CCC concurs with. Cadw notes that the geophysical survey may identify anomalies that will require archaeological evaluation to determine their significance and that the evaluation work will need to be carried out prior to the completion of the ES.</p> <p>Regarding the ASIDOHL2 assessment to be completed, Cadw states they should be consulted on this to determine the historic landscape character areas that will be included in the study.</p> <p>Cadw states that the setting of the designated heritage assets identified in the Annex to their response, should be carried out in accordance with the Welsh Government guidance given in the document "The Setting of Historic Assets in Wales". A stage 1 assessment is expected to be completed for all the designated heritage assets, which will determine the need for stages 2 to 4 to be carried out for specific heritage assets. The results of the stage 1 assessment should be included as an appendix in the ES.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.48	9.5	Study Area	<p>The Applicant's attention is drawn to Cadw's response agreeing the proposed study area for designated historic assets is appropriate. CCC concurs with this response. Cadw has included a list of designated historic assets identified inside this area.</p> <p>The Applicant's attention is also drawn to comments from Clwyd-Powys Archaeological Trust regarding the study area. The Trust highlights the size of the Scoping Corridor study area for direct asset impacts is not mentioned and should be cited in the scope and assessment. PEDW agrees that although the scoping corridor is shown in figure 1.2, further detail on its size should be clarified in the ES. The Trust adds there will also be indirect impacts in this area related to the setting of heritage assets that may be within it or nearby. The Trust adds that the 3 km area for the wider Scoping Study area should be adjusted if towers higher than 27 m are used.</p> <p>The Trust recommends Cadw and the Built Heritage Conservation Officers are consulted on the requirement for a wider study area in terms of visual and setting effects on designated assets.</p>
ID.49	9.32	Importance of assets	Clwyd-Powys Archaeological Trust suggests it would be useful for the ES to have all sites, which may be impacted directly or indirectly, tabulated by County with the assessed level of importance of the site clearly indicated.
ID.50		BBNP	<p>The Applicant's attention is drawn to comments from BBNPA contained stating that in line with the special qualities of the National Park, a full assessment will need to be considered of the assets within the National Park boundary, which are deemed to be significantly impacted.</p> <p>PEDW recommends the Applicant liaises directly with BBNPA on this matter.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.51	Q9.2	Further consultation	<p>Cadw and CCC in their responses state the Clwyd-Powys Archaeological Trust and the Dyfed Archaeological Trust should be consulted on the non-designated archaeological and heritage assets.</p> <p>Cadw and Clwyd-Powys Archaeological Trust also add that the Conservation Officers of the LPAs should be consulted on the effect of the proposals on the settings of listed buildings and Conservation Areas.</p> <p>The Applicant's attention is also drawn to comments from Clwyd-Powys Archaeological Trust regarding further consultation and requesting to see copies of any cultural heritage assessment reports and the draft Historic Environment chapter.</p>
Traffic and Transport			
ID.52	10.18	Construction Environmental Management Plan (CEMP) / Construction Traffic Management Plan (CTMP)	PEDW welcomes the SR states that a CEMP will be developed and included alongside the ES. The SR also states Outline CTMP will form part of the mitigation and PEDW recommends this should also be included as an Appendix to the ES.
ID.53		Site access	<p>PEDW notes it is not clear whether site access will include any vegetation clearance (including hedgerow or trees) or track widening. This is also highlighted in the response from the Llanarthne Area Community Pylon Group. Should this be the case, the ecological assessment and appropriate studies should include the whole site and should be included within the ES where appropriate.</p> <p>The material to be used as well and the impact that these materials will have on the surrounding area (e.g. hydrology, geology) would be an important component of the ES.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.54		Trunk Road Network	The Applicant's attention is drawn to comments from Welsh Government Transport Directorate regarding details required should access be proposed from the Welsh trunk road network. This includes full method statements and risk assessments, a Road Safety Audit and an Agreement to undertake agreed improvement works on the trunk road.
ID.55	10.6	Railways	<p>PEDW notes the SR states the proposed development interacts with a railway track in four locations. The Applicant's attention is drawn to comments from Network Rail highlighting the transport assessment should assess any level crossings construction traffic may use and outline any proposed mitigation to address adverse impacts. National Rail also states their standards for drainage should be considered, with detailed drainage plans to be submitted for their review.</p> <p>PEDW recommends the Applicant liaises directly with National Rail to ensure these matters are adequately assessed and proportionately addressed in the ES.</p>
ID.56	Q10.1	Field survey methodology	In their response 1 CCC confirms the proposed field survey methodology is considered acceptable.
ID.57	Chapter 10 / 6.26	Public Rights of Way (PRoW)	<p>The Applicant's attention is drawn to comments from CCC regarding their interactive map of PRoW which will inform impact on the network. Details of four nationally promoted long-distance recreational trails within the project area are also provided.</p> <p>The Applicant's attention is also drawn to comments from PCC's Countryside Access and Recreation team, appended to PCC's main response. The team welcomes that PRoW are scoped in under Traffic and Transport and provides details on PRoW and areas of Common Land. They add that the proposals may</p>

ID	Reference in Scoping Report	Issue	Comment
			<p>affect registered Common Land over which there is public right of access for recreation on foot and if that is the case, then the impacts on Common Land and recreation over it must be scoped into the EIA.</p> <p>The team highlights that it is not currently possible to assess which PRoW and areas of Common Land are affected by the proposed development and further input can be provided as the design progresses. The Applicant's attention is drawn to the Team's comments in relation to works on or near areas of Common Land and PRoW, including consultation and consenting requirements.</p> <p>PEDW recommends the Applicant liaises directly with both LPAs on impacts on PRoW and Common Land as further details on the development become available. As currently insufficient detail is available to determine whether there will be any significant effects, in addition to PRoW, impacts on Common Land must be scoped into the ES in a proportionate manner. Further to the outcome of further discussions with the LPAs, should impacts on Common Land be scoped out, a robust rationale for this should be provided in the ES.</p>
ID.58		Mitigation	<p>The Applicant's attention is drawn to comments from PCC's Countryside Access and Recreation team regarding mitigation in relation to impacts on PRoW and access to the countryside. In particular, the team refers to public paths within the corridor of works being fully open for use and where appropriate enhanced, as well as Section 106 funds to enhance off-site PRoW and open access land, payable on commencement of development.</p>
Noise and Vibration			
ID.59	11.20 – 11-21	Construction noise and vibration	<p>PEDW welcomes that the SR states the management of noise and vibration from construction activities will be included in the CEMP and that construction traffic, including heavy vehicle movements in particular, would be managed as</p>

ID	Reference in Scoping Report	Issue	Comment
			part of the measures implemented through the CTMP. CCC in their response states that vibration is expected to be addressed in the CTMP.
ID.60	11.31 – 11.34	Operational noise	<p>The SR states operational and maintenance noise is scoped out. However, the Applicant's attention is drawn to comments from CCC regarding operational noise, stating this needs to be assessed where properties are close to the cables / apparatus and baseline data in this regard would be required.</p> <p>PCC in their response also states that should any pylons be located in close proximity to any properties, a BS4142 noise report would be required.</p> <p>Given these comments, it is not currently possible to scope out operational noise and operational noise is therefore scoped in to the ES. PEDW recommends the Applicant discusses the assessment of operational noise directly with both LPAs. If following these discussions this aspect can be scoped out, a robust rationale for this should be provided in the ES.</p>
Water Resources			
ID.61	Chapter 12	Water quality	<p>NRW highlights that they cannot comment on the proposed approach or desk and field surveys without knowing the details of each proposal and that if structures are galvanised this might have localised impacts that will need to be considered.</p> <p>NRW also states that as the exact location of the towers is currently unknown, construction should be scoped in for Water Quality, as the potential impact from the works could be quite significant. Given these comments, it is currently not possible to scope out this topic and therefore construction impacts on Water Quality is therefore scoped in at this stage. PEDW recommends the Applicant liaises directly with NRW on this matter. Further to discussions with NRW once locations have been confirmed, if construction impacts on water</p>

ID	Reference in Scoping Report	Issue	Comment
			quality can be scoped out, a robust rationale for this should be provided in the ES.
ID.62	12.16	Water Framework Directive (WFD)	NRW welcome that implementation of future cycles of WFD management plans driving future improvements in the ecological and chemical quality of water bodies will also be considered.
ID.63	Chapter 12	Hydrology	<p>The Applicant's attention is drawn to NRW's comments regarding the development needing to avoid interception of subsurface drainage by trenches dug for cables and pipelines where relevant. NRW adds that the requirement and impact of permanent or temporary land drainage systems during construction needs to be clearly assessed, with procedures included to ensure removal of any temporary works.</p> <p>NRW also states that construction, operation and decommission phases should be considered independently within ES as it is often within the construction and decommission phases that the potential for unwanted environmental effects is the largest. NRW highlights that as the exact location of the towers is currently unknown, the potential impact of works could be quite significant, and construction should potentially be scoped in.</p> <p>Given these comments, it is currently not possible to scope out this topic and therefore construction impacts on Hydrology is therefore scoped in at this stage. PEDW recommends the Applicant liaises directly with NRW on these matters. Further to discussions with NRW once locations have been confirmed, if construction effects can be scoped out, a robust rationale for this should be provided in the ES.</p>
ID.64	Chapter 12	Hydrological features	The Applicant's attention is drawn to comments from NRW regarding the requirements for a hydrological features survey as well as assessment and

ID	Reference in Scoping Report	Issue	Comment
			<p>mitigation of risk to disruption of sub-surface flow in the context of spring flow for private water supply.</p> <p>NRW adds that spring protection zones should be implemented to lower the risk of disruption and site infrastructure should be placed away from any water features. NRW further states that the main water courses and associated catchment or subcatchment boundaries should be identified.</p> <p>NRW highlights that protection of site hydrology should be a key principle, especially through maintenance of existing surface water features and the hydrological regime.</p>
ID.65		Flood Risk	<p>NRW confirms they overall are content with the proposed desk and field surveys and support the proposal to locate towers and associated infrastructure outside of the mapped Flood Zones wherever possible.</p> <p>NRW adds that reference should be made to TAN 15 and the Flood Map for Planning and recommends the inclusion of the deep peat layer on DataMapWales to ensure that hydrological flows in and to areas of deep peat are not intercepted.</p> <p>The Applicant's attention is also drawn to comments from NRW regarding flood risk stating they consider the proposed utility infrastructure as 'Less Vulnerable Development' as per TAN15, adding this is primarily a matter for the LPA.</p> <p>NRW notes that the SR acknowledges the potential requirement for Flood Risk Activity Permits and encourages early engagement with their Development Flood Risk Team to discuss this.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.66		Flood Risk Assessment	NRW in their comments states they expect the Flood Risk Assessment to assess the risk and consequences of flooding on the development and on flood risk elsewhere. NRW adds that it must consider NRW's ability to access, maintain and improve their Flood Risk Management assets.
ID.67	Q12.2	Surface water drainage	<p>The Applicant's attention is drawn to comments from NRW regarding detail to be provided on any change to the existing surface water drainage that any component of the proposed development may have.</p> <p>Referring to Q12.2 NRW has noted that assuming 'incidental water' refers to surface water, they refer the Applicant to their advice reiterating the local hydrology being kept the same. They add they agree the proposed approach in Q12.2 is acceptable, provided the 'incidental water' is clean and unpolluted by silts or oils. If the applicant is proposing de-watering, an abstraction license will be required.</p>
ID.68	Q12.1	Infrastructure	NRW notes that without knowing the details of each proposal, they cannot comment whether the approach is acceptable that infrastructure to support the transmission will be deemed as water compatible or if not, as essential infrastructure. They add that if structures are galvanised this might have localised impacts that will need to be considered.
ID.69	12.44 – 12.45 / Table 12.1	Hydrogeology and water abstractions	NRW highlight a discrepancy in the SR where sections 12.44 and 12.45 acknowledge that the construction phase has the potential to alter groundwater flows and aquifer properties from activities such as piling, which may impact upon sensitive receptors such as Public Water Supplies and Groundwater Dependent Terrestrial Ecosystems. However, the SR proposes to scope out constructions effects upon hydrogeology based on no sensitive receptors being identified. Table 12.1 however states that Hydrogeology and Water Abstractions

ID	Reference in Scoping Report	Issue	Comment
			<p>will be scoped in during construction. NRW notes operational effects are scoped in.</p> <p>Although NRW seek clarification, they advise Hydrogeology and Water Abstractions during construction is scoped in on the basis of their comments.</p>
ID.70	12.9	Riverine Special Areas of Conservation (SAC)	<p>NRW notes that the scoping corridor overlaps or crosses the Afon Tywi River corridor in places. NRW advises that consideration of geomorphology hydromorphology will be an important consideration in these areas ensuring the proposals take into consideration the natural movement of the river so that proposed infrastructure is not under future threat, resulting in a requirement to protect assets which may impact upon the Afon Tywi SAC.</p> <p>As noted in the Biodiversity section above, NRW welcomes the inclusion of standard good practice mitigation measures outlined in section 8.69. NRW states that pollution prevention measures will likely be important factors to consider within the HRA regarding the Afon Tywi SAC.</p> <p>CCC states that the impact of construction compounds welfare facilities on the riverine SACs should be addressed as, whilst only temporary, this could be a significant impact.</p>
Ground Conditions / Geology / Hydrogeology			
ID.71		Climate change	<p>NRW recommends the potential impacts of a changing climate throughout the life cycle of the project (construction and operation) should be considered in the ES as extreme weather events have the potential to impact upon the hydrogeological regime, which in turn may have implications for factors such as the potential mobilisation of contamination, particularly from sources such as landfills.</p>

ID	Reference in Scoping Report	Issue	Comment
			As highlighted under Climate Change above, PEDW agrees that climate change should be addressed in appropriate chapters of the ES and Climate Change is therefore scoped in to this ES chapter.
ID.72	13.11	Ground Conditions	In their response NRW highlights that when referring to no foreseeable significant changes being anticipated in relation to Ground Conditions, it is unclear what significant changes have been considered by the Applicant. NRW state it would be beneficial to outline what has been considered and why this is not considered to be significant for the lifecycle of the project's construction and operation.
ID.73	13.14 / Q13.1	Data collection	NRW advises that DataMapWales is also reviewed for publicly available information for Wales. The Applicant's attention is also drawn to a number of other datasets and policy documents highlighted by NRW and LQAS.
ID.74	Q13.2	Desk Studies and Field Surveys	<p>NRW in their response highlights that the desk studies and subsequent field studies should be robust enough to identify any possible pollutant linkages, and appropriately characterise them to determine any potential significant risks to receptors.</p> <p>NRW reiterates their earlier hydrogeology comments, adding that sufficient datasets on the groundwater table covering seasonal fluctuations should be collected to adequately assess any associated significant impacts.</p> <p>The Applicant's attention is also drawn to comments from NRW regarding peat depth surveys, advising to also consider peat core and to check for deep peat where vegetation communities / Phase 1 habitats indicate its potential presence. NRW highlights that the Peatlands of Wales Map / unified peat layer is continually being updated with recent peat depth assessments as they become available.</p>

ID	Reference in Scoping Report	Issue	Comment
ID.75	13.22	Preliminary Risk Assessment (PRA)	NRW welcomes a PRA is to be undertaken and recommends hydrogeology in the context of ground conditions is included in the PRA at an early stage. NRW adds there needs to be a thorough assessment of groundwater levels and the impact of the installation of foundations upon groundwater. This should include considerations for dewatering to enable works.
ID.76	13.13 / 13.32 – 13.33	Land Contamination	<p>NRW welcomes the inclusion of existing contamination to be scoped in and expect reviews of records of contaminated land held on public registers and by the LPAs to form part of the PRA. NRW notes that in addition to this, that there is the potential for land along the study route to be investigated and identified as having contamination during the lifecycle of the project.</p> <p>NRW advises that the principles of Land Contamination Risk Management be followed for the assessment and management of any land contamination identified.</p> <p>The Applicant's attention is drawn to comments from PCC's Contaminated Land Officer regarding potential contaminated sites and the requirement for 12 figure National Grid References for all plans in the SR.</p>
ID.77	13.29	Peatland	<p>The Applicant's attention is drawn to comments from LQAS regarding peatlands, highlighting development and loss of peatland is contrary the recent update to Chapter 6 of PPW. LQAS welcomes the proposal's aim to avoid peatlands and that information on peatland locations and extent has been considered in the initial scoping corridor assessment process. LQAS further welcomes that as the project design evolves, suitable peat surveys will be undertaken, and the findings used to inform the project design.</p> <p>As referred to under Historic Environment above, the Applicant's attention is also drawn to comments from Clwyd-Powys Archaeological Trust comments</p>

ID	Reference in Scoping Report	Issue	Comment
			regarding the assessment of the impact on intact peat deposits which may contain important paleoenvironmental evidence and artefacts of prehistoric date. They add that where significant peat deposits cannot be avoided a suitable scheme of sampling, analysis, dating and reporting will need to be completed using appropriate sampling techniques advised by a paleoenvironmental / geoarchaeological specialist.
ID.78		Peatland - definition	The Applicant's attention is drawn to LQAS comments regarding the definition of peatlands to be used for assessment. LQAS highlights that this should also include any transitioning shallow peaty soils integral to the hydrological functioning of peat bodies (on site or adjoining). They add that it will need to be acknowledged that peatlands function as an ecosystem and arbitrary depth thresholds do not consider shallow peaty soils that are integral to the hydrological functioning of wider peat bodies.
Soils and Agriculture			
ID.79	14.14	Data collation	LQAS agrees with the relevant guidance regarding soils, but would add the Institute of Quarrying ' Good Practice Guide for Handling Soils in Mineral Workings ' as some of the soils handling principals may be applicable to the proposed development.
ID.80	14.5 / 14.16 – 14.17	Agricultural Land Classification (ALC)	<p>In their response at Appendix 1 LQAS welcomes the use of the ALC Predictive Map Version 2 (2019) and clarifies that that the maps should be used together with the Guidance Note. Attention is also drawn to validated ALC field surveys that could be applicable to the proposed development.</p> <p>LQAS welcomes ALC surveys will be undertaken to confirm the grades present and their distribution and states the department would be available to provide advice on survey requirements and to validate ALC survey reports on request.</p>

ID	Reference in Scoping Report	Issue	Comment
			PEDW welcomes the SR states LQAS will be consulted prior to surveys commencing with respect to the proposed survey methodology.
ID.81		Best and Most Versatile (BMV) agricultural land	LQAS states that if the refined proposals impact on BMV agricultural land, clear evidence should be provided of how PPW paragraphs 3.58 and 3.59 have been addressed. LQAS would welcome detailed information on the location, area and ALC grade of BMV land that would be subject to development, both on a temporary and permanent basis.
ID.82	14.24	Soil Resources Plan (SRP)	LQAS welcomes that an SRP will be developed and based on survey evidence. The Applicant's attention is drawn to their comments regarding the requirements for the SRP.
ID.83	Q14.1	Matters scoped out	CCC confirms they consider the proposed matters to be scoped out acceptable.
Air Quality			
ID.84		Air Quality	PEDW welcomes the SR states a range of standard measures would be adopted throughout the construction phase including secured through the adoption of a CEMP and CTMP. As indicated under Traffic and Transport above, PEDW recommends these be included as an Appendix to the ES.
ID.85	Q15.1	Matters scoped out	CCC confirms they consider the proposed matters to be scoped out acceptable.
Cumulative Effects			
ID.86			The Applicant's attention is drawn to the comments above in the Landscape and Visual Amenity section, regarding NRW's, CCC's and BBNPA's comments in relation to cumulative effects. PEDW recommends the Applicant liaises directly with the LPAs, BBNPA and NRW to agree the approach to the cumulative assessment, which should be clearly outlined in the ES.

ID	Reference in Scoping Report	Issue	Comment
ID.87	16.19		<p>As stated in Section 6.4 of this Direction, the approach set out in NSIP Advice Note 17 should be followed, and the applicant should agree the schemes to be considered with the LPAs and other consultees.</p> <p>PEDW would also reiterate that while developments that have already been constructed will form part of the baseline, this does not mean that they should be excluded when considering cumulative effects. Paragraph 5 of Schedule 4 of the 2017 Regulations makes it clear that consideration of cumulative effects should include existing development.</p>
Other Considerations			
ID.88		Non-Technical Summary (NTS)	The Applicant's attention is drawn the IEMA guidance on Effective Non-Technical Summaries for Environmental Impact Assessment . The guidance indicates that large linear projects may impact too many receptors to report in one document and it may be appropriate to split the NTS into smaller documents covering smaller spatial extents.
ID.89		Material Assets and Waste	It will be necessary to address Material Assets and Waste in a proportionate manner in relevant chapters, especially given the requirement to address the decommissioning phase in the ES. The draft CEMP should be also be included as a technical appendix to the ES. Material Assets and Waste is therefore scoped in to the ES, although not necessarily as a standalone chapter.

9. Other Matters

This section does not constitute part of the Scoping Direction, but addresses other issues related to the proposal.

9.1 Changes to PPW

On 11 October 2023 the Welsh Government introduced changes to Chapter 6 of PPW relating to:

- Green Infrastructure,
- Net Benefit for Biodiversity and the Step-wise Approach,
- Protection for Sites of Special Scientific Interest, and
- Trees and Woodlands.

Details are available in the relevant 'Dear Chief Planning Officer' letter:

<https://www.gov.wales/addressing-nature-emergency-through-planning-system-update-chapter-6-planning-policy-wales>

These changes have now been consolidated into a new edition of PPW (ed. 12), published on 07 February 2024: <https://www.gov.wales/planning-policy-wales>

9.2 Habitats Regulation Assessment

[The Conservation of Habitats and Species Regulations 2017](#) require competent authorities, before granting consent for a plan or project, to carry out an appropriate assessment (AA) in circumstances where the plan or project is likely to have a significant effect on a European site (either alone or in combination with other plans or projects). The competent authority in respect of a DNS application is the relevant Welsh Minister who makes the final decision. It is the Applicant's responsibility to provide sufficient information to the competent authority to enable them to carry out an AA or determine whether an AA is required.

When considering whether or not significant effects are likely, applicants should ensure that their rationale is consistent with the [CJEU finding](#) that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an AA and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site when determining whether an AA is required ('screening'). The screening stage must be undertaken on a precautionary basis without regard to any proposed integrated or additional avoidance or reduction measures. Where the likelihood of significant effects cannot be excluded, on the basis of objective information the competent authority must proceed to carry out an AA to establish whether the plan or project will affect the integrity of the European site, which can include at that stage consideration of the effectiveness of the proposed avoidance or reduction measures.

Where it is effective to cross refer to sections of the ES in the HRA, a clear and consistent approach should be adopted.

The Planning Inspectorate's guidance for Nationally Significant Infrastructure Projects – [Advice Note 10: Habitat Regulations Assessment relevant to Nationally Significant Infrastructure Projects](#) may prove useful when considering what information to provide to allow the Welsh Ministers to undertake AA.

9.3 SuDS Consent

Whilst a separate legislative requirement from planning permission, the Applicant's attention is drawn to the statutory SuDS regime that came into force in Wales in January 2019. The requirement to obtain SuDS consent prior to construction may require iterative design changes that influence the scheme that is to be assessed within the ES and taken through to application. As such, it is recommended that the applicant contact the local SuDS Approval Body early on.

Appendix 1: Consultation Responses

From: Gary Glenister [REDACTED]

Sent: Tuesday, December 5, 2023 4:03 PM

To: PEDW – Gwaith Achos / Casework <PEDW.Casework@gov.wales>; PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>

Subject: DNS CAS-02379-G1Z1J0 Scoping Opinion

Dear PEDW,

Thank you for consulting Carmarthenshire County Council on the scoping request for DNS CAS-02379-G1Z1J0. This response is within the agreed extended timetable for response. The proposal is the cable route from an energy park known as Nant Mithil in Powys. The route is proposed to be primarily via overhead lines mounted on 27m lattice pylons, to a substation near Llandyfaelog to input electricity into the grid. There is reference to underground cabling where appropriate but details are not specified so it is assumed that the cable will be overhead.

I have carried out consultation with internal colleagues and a selection of external consultees in order to assess whether the scope of the EIA as set out in the applicant's scoping report is acceptable.

This response is limited to the scope of the EIA and is no indication of the views of the Authority or the likely response within the consultation process. Whilst the main site for the Nant Mithil Energy Park is in Powys, Carmarthenshire as Local Authority for a significant proportion of the cable route is likely to submit a representation independently of the Local Impact Report, which is a technical assessment of the scheme.

The applicant has set out a series of questions in order to focus the discussion which I set out below along with the LPA response.

Q6.1: Are the proposed topics to be scoped in/out appropriate?

Yes, however omitted topics need to be covered in separate documents. The compliance with ICNIRP is noted, however there may be consequential impacts from electro magnetic forces such as phone and broadband signal that affect amenity.

Landscape and Visual Amenities

Q7.1: Is the proposed LVIA Study Area (3km buffer on either side of the nominal centre line of the final alignment and 1km buffer on either side of the nominal centre line of UGC sections) considered appropriate?

It is considered that the provisional LVIA Study area is acceptable, however it is requested that the proposed wider consideration of extensions to the study area as set out in para 7.7 of the Scoping Report be fully enacted.

Zone of Theoretical Visibility (ZTV) mapping should fully inform the final definition of the LVIA Study area and additional sensitive receptors and viewpoints in locations where the topography allows visibility extending beyond the provisional LVIA Study area, should be included.

Q7.2: Is the proposed approach and scope for the assessment of effects on landscape character, based on a project specific local landscape character assessment (drawing on LANDMAP), considered to be appropriate?

It is considered that the proposed approach and scope for the assessment of effects on landscape character is generally acceptable, pending consideration of the following: -

- Carmarthenshire County Council have commissioned a Landscape Character Assessment for the authority area. This document is currently under preparation by appointed consultants.

It is advised that this document should be addressed as a base reference document pending the status at the time of landscape character assessment.

- It is advised that the guidance references for assessment of effects on landscape character also include Landscape Institute Technical Guidance Note 02/21 Assessing landscape value outside national designations.

Q7.3: Is the proposed approach and scope for the assessment of visual effects appropriate?

It is considered that the proposed approach and scope for the assessment of visual effects is generally acceptable, pending consideration of the following: -

- It is advised that within the study area the road network is often used as a recreational resource, for equestrian, cycling and walking routes providing links between sections of the formal public right of way network. It is requested that these users be considered as highly sensitive receptors within the visual baseline.
- The Scoping Report does not provide commentary on the specific methodology for visual impact assessment. It is acknowledged that the Scoping Report sets out a list of Legislation and Guidance (para. 7.28) upon which assessment will be based, however it is requested that assessment methodology fully address the full range of potential visual impacts including those arising from the following effects: -
 - In combination from one (static) viewpoint i.e. where a number of towers or other infrastructure can be seen within the observer's arc of vision at the same time.
 - In succession from one (static) viewpoint i.e. where the viewer has to turn to see a number of towers or other infrastructure around them.
 - Sequential effects on a journey i.e. where a number of towers or other infrastructure can be seen one after the other over a period of time by an observer moving through the landscape.

Q7.4: Do consultees consider that the proposed viewpoints are appropriate to inform the visual assessment, subject to further viewpoints being agreed based on the developed route proposal, and that the suggested presentation of visualisations is appropriate?

It is advised that there are no unacceptable preliminary viewpoint locations within the Carmarthenshire authority area set out in the scoping report. However, it is advised that, as the proposed project is an extensive linear project with expected landscape and visual effects over a wide area it is not appropriate to set or agree to a ceiling figure of '*up to 30 representative viewpoints.*' (Scoping Report para. 7.24). The

number of representative viewpoints should provide sufficient coverage to fully address the nature and extent of landscape and visual impacts.

It is advised that representative viewpoints should be selected to inform and illustrate assessments of impacts to landscape character as well as visual assessment, it is advised that sufficient appropriate representative viewpoints should be included accordingly.

It is noted that the Scoping Report identifies '*Residents of the area, both within settlements and throughout the study area.*' (Scoping Report para. 7.23) as potentially highly sensitive visual receptors. It is noted that the preliminary viewpoint selections do not represent all settlements within the provisional LVIA Study area. It is advised that detailed scoping of all settlements within the ZTV be undertaken, and appropriate representative viewpoints be included in a final selection as appropriate. It is advised that robust justification for scoping out a settlement should be provided and agreed by consultees.

It is requested that appropriate representative viewpoints from the proposed Tywi Valley Path be included and agreed by consultees.

Q7.5: Is the approach to inclusion of schemes within the cumulative assessment appropriate?

The Scoping Report provides minimal description of the schemes to be included within the cumulative assessment.

It is requested that the methodology for assessment of cumulative landscape and visual impacts and identification of cumulative developments to be considered within the assessment be agreed with consultees through the EIA process.

Q7.6: Is the approach to the assessment of effects on residential visual amenity appropriate?

It is noted that the Scoping Report sets out a key aim of ongoing design to avoid locations of '*individual structures*' within 150m of residential properties. It is advised that a separation distance be maximised through detailed design work.

The Scoping Report relates to the structures however it does not provide commentary on the proximity of the overhead line alignment to residential properties. It is advised that an appropriate design phase separation constraint be considered as part of detailed design.

It is advised that the definition of a proposal to undertake residential visual amenity assessment on properties within 150m of '*towers or other infrastructure*' (Scoping Report para. 7.34) is premature. It is advised that the specific impacts of relative elevations and in combination and in succession effects cannot be pre-assessed to be limited to 150m. It is advised that separation distances be subject to a robust and justified appraisal prior to establishment of a study area to individual properties.

It is requested that the proposed study area to individual or groups of properties be agreed with Carmarthenshire County Council prior to commencement of any RVA assessment.

The Scoping Report does not address the construction phase impacts arising from the installation of any underground sections of the route. It is advised that these impacts should be fully assessed as part of the RVAA. Mitigation proposals should be detailed as part of residual impact assessment.

Q7.7: Do consultees agree with the effects to be scoped out of the LVIA?

Yes

Biodiversity

Q8.1: Do consultees agree that the scope of desk studies and ecological baseline surveys proposed are sufficient and proportionate to inform the design and assessment of the Project?

P.39 states that “Bird flight activity: within 500m”. Is this sufficient?

Any mature trees / veteran / ancient trees should be avoided.

P.53 The term in Wales is Net Benefit for Biodiversity (NBB) not Biodiversity Net Gain (BNG) and we do not support the use of the BNG Metric. NBB should be assessed in terms of habitat losses and gains and be designed early in the scheme using recent updated Chapter 6 guidance (PPW 11).

P.55 reptiles may need to be scoped in depending on habitat.

Q8.2: Do consultees agree with the assessment method (including scoped in/scoped out effects)?

The approach and scope for the assessment is acceptable.

Q8.3 Do consultees hold any data sets that could be made available to inform the assessment?

Please consult West Wales Biodiversity Information Centre.

Q8.4 Do consultees agree with the proposed bat surveys and the approach to the assessment?

The approach and scope for the assessment is acceptable provided that any mature trees / veteran / ancient trees are avoided. If mature trees are affected then a bat survey is recommended.

Historic Environment

Q9.1: Do consultees consider the Study Area appropriate?

We agree with Cadw’s response in respect of the proposed study area.

Cadw stated:

No area to determine the direct impact on historic assets including non-designated ones has been identified in the scoping report. This should be the area included in the scoping corridor.

Q9.2: Are there any other relevant consultees who should be consulted about this topic?

Again I would agree that the Archaeological Trust's should be consulted in respect of impacts on the non-designated archaeological and heritage assets on the heritage asset register within the study area.

Cadw stated:

The archaeological planning services of the Clwyd-Powys Archaeological Trust and the Dyfed Archaeological Trust should be consulted on the non-designated archaeological assets. The Conservation Officers of the Local Planning Authorities should be consulted on the effect of the proposals on the settings of listed buildings.

Q9.3: Are consultees aware of any other supplementary guidance of relevance to assessment of effects to historic assets?

No.

Cadw stated:

In addition to the legislation, policy and guidance stated in section 9.21 of the scoping report we would expect that the advice given in the Powys CC Supplementary Planning Guidance on Archaeology and Historic Environment should be considered. The application will not be submitted until 2025 as such The Historic Environment (Wales) Act 2023 will have been enacted and will need to be considered in the EIA.

Q9.4: Is the approach to the assessment of effects, including those effects scoped in and out and the cumulative assessment, appropriate?

Yes, however I would wish to see an individual assessment of the setting of designated assets within the study area for all listed buildings that are deemed to have a more than immediate setting, i.e. mainly those within the Tywi Valley. The setting of some heritage assets within the principal towns in our areas that would be affected (Llandeilo, Llangadog and Llandovery) and the Conservation Areas within those towns, in particular those with views over the Study Area will need to be addressed. It is most appropriate to undertake these assessments using Cadw's (2017) Setting of Historic Assets in Wales guidance, in order for impacts to be ranked in a manner concurrent with how other applications that affect the setting of listed buildings in our LA area have been assessed. It may also be prudent to carry out an overview Heritage Impact Assessment and Statement for the area, to include any justification/mitigation for the works proposed, which inherently will seemingly have detrimental impacts on the setting of heritage assets throughout the Tywi Valley.

Q9.5: Is the approach to surveys, including geophysical survey, considered appropriate?

I will again defer to Cadw on their response to consultation on this question, which I concur with.

Cadw stated:

The geophysical survey may identify anomalies that will require archaeological evaluation to determine their significance. The evaluation work will need to be carried out prior to the completion of the EIA.

An ASIDOHL2 assessment will be required and Cadw should be consulted on this to determine the historic landscape character areas that will be included in the study.

The setting of the designated heritage assets identified in Annex B, should be carried out in accordance with the Welsh Government guidance given in the document “The Setting of Historic Assets in Wales”. We would expect a stage 1 assessment to be carried out for all of these designated heritage assets, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific heritage assets. The results of the stage 1 assessment should be included as an appendix in the EIA.

Traffic and Transport

Q10.1 Is the proposed field survey methodology acceptable, in the event they are necessary?

Upon review of the submission and associated documents the proposed scope for the traffic and transport element of the project, the proposed field survey methodology are acceptable.

Carmarthenshire County Council has an interactive map of Public Rights of Way which will inform impact on the network.

<https://www.carmarthenshire.gov.wales/home/council-services/public-rights-of-way/public-rights-of-way/>

There are four nationally promoted long-distance recreational trails within the project area:

- The Heart of Wales Line Trail - <https://www.heart-of-wales.co.uk/experiences>
- The Cambrian Way - <https://www.cambrianway.org.uk/>
- The Beacons Way - <https://www.breconbeacons.org/things-to-do/walking/the-beacons-way>
- The Wales Coast Path - <https://www.walescoastpath.gov.uk/?lang=en>

Q10.2: Are the proposed matters to be scoped out acceptable?

Matters to be scoped in and out are acceptable.

Noise and Vibration

Q11.1: Are you satisfied with the proposed scope of the assessment in terms of noise and vibration?

Operational noise needs to be assessed where properties are close to the cables/apparatus. Noise Conditions are common practise for solar DNS given the noise generated from sub stations, inverters etc. Vibration will be expected to be addressed in the Construction Traffic Management Plan.

Q11.2: Do you agree that no specific baseline noise or vibration monitoring would be required?

See above – Baseline data would be required where the line is close to residential properties.

Water Resources

Q12.1: We have assumed that infrastructure to support the transmission (towers etc) will be deemed as water compatible or if not, as essential infrastructure. Please could you confirm that this approach is acceptable?

Q12.2: Given the very localised nature of proposed permanent ground based infrastructure e.g. towers, we assume that formal drainage arrangements will not be required with incidental water returned to ground adjacent to the structure. Please could you confirm that this approach is acceptable?

Q12.3 Are you in agreement that the proposed desk and field surveys are sufficient for the purposes of the EIA?

Carmarthenshire County Council will defer to NRW in terms of flood risk.

SAB Approval is required but that is under other legislation.

No mention is made of construction compounds welfare facilities impact on the riverine SACs in terms of phosphates from toilets, washing/showering etc as required. Whilst only temporary, this could be a significant impact so needs to be addressed.

Ground Conditions Geology and Hydrogeology

Q13.1: Please confirm what dataset(s)/ policy document(s) are available to ensure that our assessments are as robust as possible (including any site identified, prioritised or proposed to be investigated under Part IIa of the Environmental Protection Act.?

Q13.2: Confirmation that the desk and field surveys are sufficient for the purposes of the EIA.

Q13.3: Do you consider the potential effects to be scoped in and out to be appropriate to inform a proportional assessment?

Carmarthenshire County Council has no observations.

Soils and Agriculture

Q14.1: Are the proposed matters to be scoped out acceptable?

Yes

Air Quality

Q15.1: Are the proposed matters to be scoped out acceptable?

Yes

Conclusion

The general scope of the EIA as set out is considered to be acceptable, however there are detailed queries which should be addressed as set out above. I would suggest that the applicant submits a formal Pre-Application submission so that a discussion can take place prior to the submission of the DNS for determination by Welsh Ministers. A copy of the landscape officer's response is being sent directly to the applicant with a request that they engage on a detailed level prior to the work being carried out.

Regards,

Gary Glenister BSc (Hons) Dip TP MRTPI

Uwch Swyddog Gorfodi a Monitro / Senior Enforcement and Monitoring Officer
Gwasanaethau Cynllunio / Planning Services

Rhif ffon / Tel No: [REDACTED]

e-bost / email: [REDACTED]

Croeso I chi gysylltu gyda Chyngor Sir Gâr yn Gymraeg neu yn Saesneg.
You are welcome to contact Carmarthenshire Council in Welsh or English.



DELEGATED DECISION

Powys County Council Constitution Schedule 13 Responsibility for Functions

Application Number: 23/1660/PRL **Grid Ref:** E: 316426
N: 263955
Community Council: Penybont Community **Valid Date:** 24.10.2023
Case Officer: Kate Bowen

Applicant: Marlose Holtkamp

Location: Green GEN Towy-Usk Project, Nant Mithil Energy Park, Radnor Forest Area of Powys, Near Carmarthen

Proposal: DNS EIA Scoping Opinion - CAS-02379-G1Z1J0

Application Type: Preliminary enquiry

Consultee Responses

Consultee	Received
Clwyd Powys Archaeological Trust	31 st October 2023
Powys County Council Environmental Protection	10 th November 2023
Powys County Council Countryside Services	16 th November 2023
Powys County Council Contaminated Land Officer	27 th November 2023

Please see attachments for full consultation responses.

Introduction

Planning and Environment Decisions Wales (PEDW) consulted Powys County Council local planning authority (the LPA) requesting the LPA's advice on the scope of the proposed EIA and the proposed methodologies outlined in the Scoping Report, in respect of the above proposed development. The LPA have considered the Scoping Request and offer the following comments.

The construction and operation of up to seven (7) wind turbines, an electrical substation and control building, underground power cables, anemometer mast, site access tracks, habitat management, and, where necessary, off-site highway improvements. Photovoltaic solar panels and battery storage units may be included as part of the Proposed Development following the completion of further and future technical studies.

- Planning Constraints

The interactive Constraints Map available at the following web link: [Cyngor Sir Powys County Council – Local Plan: Powys LPA Constraints Map \(opus4.co.uk\)](https://opus4.co.uk/CyngorSirPowysCountyCouncilLocalPlan/PowysLPAConstraintsMap) may be useful in identifying any key policy and designated site constraints. Please note that this data should NOT be relied on for legal purposes and may not be fully up to date with changes made to the constraints data in the County. The Council can accept no responsibility for any error or inaccuracy which may arise.

- Local Planning Policy

The adopted Powys Local Development Plan and associated suite of Supplementary Planning Guidance can be found at the following weblink: <https://en.powys.gov.uk/article/4898/Adopted-LDP-2011---2026>.

Clwyd Powys Archaeological Trust have referred to inclusion of the Historic Environment SPG and other relevant policy/guidance within the EIA and the other SPG's (e.g. Renewable Energy, Landscape, Biodiversity and Geodiversity) will be relevant the project.

- Proposed EIA Scope

Q6.1: PCC welcomes the topics scoped in.

Health and Wellbeing has been scoped out of the EIA as an individual topic chapter with information contained in appropriate chapters. Countryside Services have advised that public rights of way make a significant contribution to the health and wellbeing of residents and visitors to Powys. This must be considered in the sections of text around health and wellbeing, whether incorporated into other chapters or forming a separate chapter in its own right. It would be preferable if Health and Wellbeing was an individual topic chapter, however it is agreed that information must be included within relevant chapters if not included as a separate topic.

Climate Change has been scoped out of the EIA and PCC has no comments in this respect.

Major Accidents and Disasters has scoped out of the EIA and PCC has no comments in this respect.

Decommissioning has been scoped out of the EIA but should be considered in relevant chapters.

EMFs Information is to be prepared and submitted as a separate document with the application but scoped out of the EIA and PCC has no comments in this respect.

Socio-Economics has been scoped out of the EIA and PCC has no comments in this respect.

- *Landscape and Visual Amenity*

PCC has no comments to make in respect of questions Q7.1 to Q7.7.

- *Biodiversity*

Q8.1: Study area needs to include areas of transport route that will be impacted in order to establish the development.

PCC has no comments to make in respect of Q8.2 and Q8.4.

Q8.3: Consideration of species and habitats identified within the PNRAP would ensure locally important species and habitats can be appropriately accounted for and for net biodiversity loss of these species and habitats to be avoided, The Powys Nature Recovery Action Plan is available at the following link:

<https://en.powys.gov.uk/article/2573/Powys-Nature-Recovery-Action-Plan>

- *Historic Environment*

Please see Clwyd Powys Archaeological Trust's full comments.

Otherwise PCC has no further comments to make in respect of Q9.1, Q9.2, Q9.4 or Q9.5.

Q9.3: PCC Conservation Areas Supplementary Planning Guidance.

- *Traffic and Transport*

PCC has no comments in respect of Q10.1 and Q10.2.

- *Noise and Vibration*

Please see the comments received from PCC Environmental Protection. Otherwise PCC has no further comments in respect of Q11.1 and Q11.2.

- *Water Resources*

PCC has no comments in respect of Q12.1, Q12.2 and Q12.3.

- *Ground Conditions, Geology and Hydrogeology*

PCC has no comments in respect of Q13.1, Q13.2 and Q13.3, however please note the comments from the PCC Contaminated Land Officer.

- *Soils and Agriculture*

PCC has no comments in respect of Q14.1.

- *Air Quality*

PCC has no comments in respect of Q15.1.

- *Cumulative Effects*

PCC has no comments in respect of Q16.1.

Kate Bowen

From: David Jones
Sent: 27 November 2023 14:05
To: Kate Bowen
Subject: RE: 23/1660/PRL DNS EIA Scoping Consultation - Green GEN Towy-Usk Project

Hi Kate

I assume that any potential contaminated sites are to be identified along the line of the cables? If yes then all of the plans shown in the scoping report will require 12 fig NGRs other wise it is far too vague to work with.

Thanks
David

From: Environmental Protection <environmental.protection@powys.gov.uk>
Sent: Thursday, October 26, 2023 4:57 PM
To: Laura Lewis [REDACTED]
Cc: David Jones [REDACTED]
Subject: FW: 23/1660/PRL DNS EIA Scoping Consultation - Green GEN Towy-Usk Project

Hi,
WK202313645

I had to choose Powys as the address as it just seems to be a large area. If there is anywhere more specific for it, or if it should be for Dave, let me know and I can change it.

David, would you need a WK for this too?

Many thanks
Nick

Llawer o ddiolch / Many thanks
Nicholas Underhay

Gweinyddwr
Administrator



Iechyd yr Amgylchedd - Cyngor Sir Powys
Environmental Health – Powys County Council



Rhif ffôn / Tel no. – [REDACTED]



Cyfeiriad ebost / email address – [REDACTED]
[REDACTED]

Croeso i chi gysylltu â ni yn Gymraeg. Byddwn yn ymateb yn Gymraeg, heb oedi. / You are welcome to contact us in Welsh. We will respond in Welsh, without delay.



**YMDDIRIEDOLAETH
ARCHAEOLEGOL
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23/1660/PRL DNS EIA Scoping Consultation - Green GEN Towy-Usk Project – DNS CAS-02379-G1Z1J0

Dear Kate

Thank you for the scoping opinion consultation on the proposed overhead line grid connection route for the Nant Mithil windfarm in Powys.

In terms of our specific interests, we would be commenting on impacts to the non-designated heritage in the Powys CC area. The archaeological advisor for the Carmarthenshire section of this scheme would be Mr Mike Ings at Dyfed Archaeological Trust [REDACTED] who should be contacted with regard to his comments on this scoping opinion. Cadw (cadwplanning@gov.wales) will comment on Scheduled Monuments and their settings, Registered Parks and Gardens and their settings, Battlefields, Registered Historic Landscapes and World Heritage Sites. The Powys CC (Sam Johnson [REDACTED]) and Carmarthenshire Built Heritage Conservation Officers will comment on Listed Buildings and their settings and Conservation Areas and their settings.

We have the following comments on relevant sections of the Ch9 Historic Environment scoping opinion. All other sections not commented on are accepted as appropriate for the EIA assessment:

9.5 Study Area

The size of the Scoping Corridor study area for direct asset impacts is not mentioned and should be cited in the scope and assessment. It appears to be targeted at the construction area and it should be noted that there will be indirect impacts in this area also related to the setting of heritage assets that may be within it or nearby.

The 3km area for the wider Scoping Study Area appears to be fine for 27m lattice towers, but some towers may be higher than this for design reasons and it should be adjusted accordingly if higher towers are used. Cadw and the Built Heritage Conservation Officers may require a wider study area in terms of visual and setting effects on designated assets and they should be consulted for their comments on this.

9.6 Sources

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In addition to the sources cited in the list we would expect the following sources to be consulted as a minimum:

The new National Wales 1 metre DTM and DSM Lidar datasets from NRW here <https://datamap.gov.wales/maps/lidar-viewer/view#/> where first clicking on the WG Lidar 2020-22 tile index in the left menu and then zooming in on the map will present the relevant area tiles. These tiles can be clicked on to get links to the DTM and DSM tiles for processing and visualisation. Any new sites located on the lidar must be verified on the ground by the archaeological team and mapped, described, photographed and interpreted with images and an accompanying gazetteer of sites included in the report. All sites should be categorized for their importance and the significance of impact stated.

Designated asset data from the Historic Wales Portal <https://historic-wales-rcahmw.hub.arcgis.com/>

Archaeological records held by the National Monuments record RCAHMW including information on historic place names <https://rcahmw.gov.uk/discover/list-of-historic-place-names/>, photographs, documents and archaeological archive material.

Archaeological records held by Clwyd-Powys Archaeological Trust HER (via direct consultation with the HER team her@cpat.org.uk and not just relying on Archwilio data)

Conservation Area details from the Powys CC.

LANDMAP historic landscape and cultural landscape aspect datasets and associated character areas from NRW with the predicted significance of impact to be quantified. This may be covered in the LVIA but should also be referred to in the Historic Environment chapter.

Maps, plans and documents held in the Powys County Archives
<https://en.powys.gov.uk/article/1929/Powys-Archives-location-and-opening-hours>

Maps, plans and documentary sources held at National Library of Wales including the Tithe Maps of Wales <https://places.library.wales/home>

Aerial photos held by the Central Register for Aerial Photography Wales (CRAPW) <http://aerialphotos.wales.gov.uk/>



Data for artefact find locations held by the Portable Antiquities Scheme via
<https://finds.org.uk/>

Readily available and relevant primary and secondary published sources and unpublished archaeological reports.

ZTV diagrams from lattice pylon tip out to a 3km radius (or wider where required e.g. by Cadw) to determine those heritage assets which will be affected visually for subsequent setting impact assessments.

Findings of other environmental topics (landscape, water, geology, soils, peat management).

9.21 Legislation Policy and Guidance

In addition to the legislation, policy and guidance already stated the following should be referred to in the assessment:

Powys CC Supplementary Planning Guidance on Archaeology and Historic Environment available here <https://en.powys.gov.uk/article/4907/LDP-Supplementary-Planning-Guidance-SPG-and-Supporting-Policy>

The Historic Environment (Wales) Act 2023 which can be viewed here:
<https://www.legislation.gov.uk/asc/2023/3/contents/enacted>

Cadw/CCW/WG Guide to good practice using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process. ASIDOHL2 Revised edition (2007)
https://cadw.gov.wales/sites/default/files/2019-05/LandscapesRegisterGoodPractice_EN_0.pdf

CIFA Standard and Guidance for Historic Environment Desk-Based Assessment (Chartered Institute for Archaeologists (CIfA, 2020).

CIFA Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment (CIfA 2020).

CIFA Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives (CIfA June 2020)

CIFA Standard and guidance for field evaluation (CIfA June 2020)



9.25 Reporting of HEDBA and subsequent pre-application surveys

If archaeological contractors are used to complete the assessment a written scheme of investigation (WSI or specification) document should be approved in advance for all assessments in accordance with CIFA standards and guidance. Copies of all resulting digital archives should be deposited with the Historic Environment Records at CPAT and DAT, the National Monuments Record, RCAHMW and/or ADS (The Archaeology Data Service) in accordance with all relevant CIFA Standards and Guidance. The final reports must contain a Data Management Plan, Archive Selection Strategy, Archive Content List and a statement on the archive deposition location and timing and should adhere to each individual archive's submission guidelines.

9.26 Additional studies supporting the HEDBA

Paleoenvironmental Potential

The impact on intact peat deposits which may contain important paleoenvironmental evidence and artefacts of prehistoric date should be assessed. There may be some surface exposures of peat, boggy areas and pools within the development area which may indicate the sub-surface presence of peat deposits. Normally the peat deposit depths and extent will be mapped as part of any NRW Peat Management Plan requirements. In archaeological terms we would generally be interested in any peat deposits deeper than 0.40 m although shallow deposits can also be archaeologically significant. The lattice pylons, underground cable sections, switching station, compounds and any new access roadways or stripped wayleaves should seek to avoid all peat deposits. Where significant peat deposits cannot be avoided a suitable scheme of sampling, analysis, dating and reporting will need to be completed using appropriate sampling techniques advised by a paleoenvironmental/geoarchaeological specialist.

Geophysics and Evaluation Trenching

It is highly likely that the entire width (25m) and length of any proposed underground cable sections of the route would need to be assessed with prior geophysical survey followed by evaluation trenching. Other locations such as tower bases, haul and access roads,



compounds and the switching gear site at Builth Wells may need to be surveyed with geophysics.

9.32 Importance

It is useful when digesting the information provided in the ES chapter to have all sites which may be impacted directly or indirectly tabulated within the report with their HER PRN, name etc and the assessed level of importance of the site clearly indicated in a column. It would also be useful to have them separated by County so that we can quickly ID those sites in Powys and those in Carmarthenshire.

Questions for Consultees

Q9.1: Do consultees consider the Study Area appropriate?

Yes but see comments re 9.5 above

Q9.2: Are there any other relevant consultees who should be consulted about this topic?

See opening paragraph above.

Q9.3: Are consultees aware of any other supplementary guidance of relevance to assessment of effects to historic assets?

See 9.21 above

Q9.4: Is the approach to the assessment of effects, including those effects scoped in and out and the cumulative assessment, appropriate?

Yes

Q9.5: Is the approach to surveys, including geophysical survey, considered appropriate?

See 9.25 and 9.26 above

Timing of the EIA Survey Window for Cultural Heritage Assessment

A realistic time period should be set aside to complete the archaeological assessment, reporting and mitigation discussion before the application is formally submitted for

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examination and in accordance with guidance on pre-determination archaeological evaluation set out in Technical Advice Note 24 (May 2017): Paragraph 4.7 and Planning Policy Wales (Feb 2021): Paragraph 6.1.26 Failure to complete the appropriate surveys may result in delays at the examination stage if we have to ask for additional information to be supplied. The applicant should therefore adjust their application submission dates if necessary to ensure these surveys are fully completed.

Further Consultation & Communication

We would welcome further direct correspondence and communication with the archaeological consultants/contractor who are engaged to complete the cultural heritage assessment as part of an iterative design process and we would also wish to see copies of any cultural heritage assessment reports completed as the design process moves forward. We would expect to be consulted at the PEIR stage of the EIA process and see a draft copy of the Historic Environment chapter of the ES before the application is submitted.

Kate Bowen

From: Laura Lewis
Sent: 10 November 2023 11:45
To: Kate Bowen
Subject: 202313645 Towy-Usk Project

Dear Kate,

Environmental protection would make the following comments in respect of this application.

It is not entirely clear from the plans how close the pylons are going to any properties, should any pylons be going in close proximity to any properties we would require a BS4142 noise report.

At the planning application stage, the applicant should demonstrate that the proposal meets the requirements of the ICNIRP RF EMF Guidelines 2020.

Kind regards

Laura

Laura Lewis ACIEH

Swyddog Iechyd yr Amgylchedd (Gwarchod yr Amgylchedd) Environmental Health Officer (Environmental Protection)

(Gwarchod yr Amgylchedd) – Cyngor Sir Powys (Environmental Protection) – Powys County Council

Please note my working days are Monday, Tuesday, Thursday and Friday



Croeso i chi gysylltu a ni yn Gymraeg. Byddwn yn ymateb yn Gymraeg heb oedi.
You are welcome to contact us in Welsh. We will respond in Welsh, without delay.



Follow us on Twitter @PowysEnvHealth

Er mwyn cyflenwi gwaith Gwasanaeth Iechyd yr Amgylchedd, mae angen prosesu data personol yn unol â'r ddeddfwriaeth berthnasol. Bydd y wybodaeth hon yn cael ei chadw yn unol â'r ddeddfwriaeth, a rhestr cadw gwybodaeth y Cyngor. Os oes gennych unrhyw bryder ynghylch y defnydd a wneir o'ch data personol cysylltwch â'r Swyddog Diogelu Data trwy anfon e-bost at Information.Compliance@powys.gov.uk <<mailto:Information.Compliance@powys.gov.uk>> neu ffoniwch 01597 826400. Sylwch fod modd dod o hyd i ragor o wybodaeth am Ddiogelu Data a Phreifatrwydd yn y cyfeiriad gwe canlynol: <http://www.powys.gov.uk/privacy>

In order to deliver the Environmental Health Service, it is necessary to process personal data in accordance with the relevant legislation. Information held will be retained in accordance with the legislation and the Councils retention schedule. If you have any concerns regarding the use of your personal data please contact the Data Protection Officer by email at Information.Compliance@powys.gov.uk or by phone at 01597 826400. Please note that further

information on the Data Protection and Privacy can be found at the following address:

<http://www.powys.gov.uk/privacy>

Green GEN Towy-Usk Project comments – public rights of way, common land and access land, 16th November 2023:

The proposed overhead electrical connection from the proposed Nant Mithill Energy Park to a proposed substation near Carmarthen will have both direct and indirect impacts on public rights of way, common land and access land as set out below. Consideration of these impacts should form part of the Environmental Impact Assessment (EIA.)

We note that it is proposed that public rights of way be scoped into the EIA under chapter 10 (Traffic and Transport) and we welcome this. However, it is not proposed to include a separate chapter on health and wellbeing. Public rights of way do make a significant contribution to the health and wellbeing of residents and visitors to Powys. This must be considered in the sections of text around health and wellbeing, whether incorporated into other chapters or forming a separate chapter in its own right. The proposals may affect registered common land over which there is public right of access for recreation on foot under the Countryside and Rights of Way Act 2000. If that is the case, then the impacts on common land and recreation over it must be scoped into the EIA. Further detail is below.

1. It is not currently possible to assess which public rights of way and areas of common land are affected by the proposed construction of pylons and substations at this time. There are 132 public rights of way and 7 areas of Common Land within the Scoping Corridor. As the design progressed the future details will allow Countryside Access and Recreation team to provide better input in due course.
Mapping to show public rights of way and digital data downloads are free of charge at: <https://en.powys.gov.uk/article/13184/Public-Rights-of-Way-Map>
2. If physical works are on areas of common land, the developer must be aware that, common land does benefit from a high degree of legal protection. Under section 38 of the Commons Act 2006, it is unlawful for 'restricted works' to take place on common land without prior consent. The developer will need to obtain common land consent as a secondary consent for any changes to the access track, new access tracks, fences, ditches, embankments or other work on the common.
3. The developer must avoid siting pylons and substations on any public rights of way. If it is not possible to site infrastructure away from public rights of way, then a permanent legal diversion will be required, as a secondary consent, before any construction affecting the line of the public rights of way can commence. Details of any proposed diversion route must be agreed with the Countryside Access and Recreation team beforehand, to ensure that the diversion route is appropriately located for accessibility, maintenance and connections with the surrounding network.
4. New access tracks (permanent or temporary) which may be constructed for the installation of pylons, substations or cable lifting operations can adversely affect public rights of way and common land due to changes of level, surfacing, new drainage ditches, culverts and fencing. These details must be agreed with the Countryside Access and Recreation team in advance, at all locations where an access track will cross or coincide with the line of a public rights of way.
5. Cable lifting operations are likely to need scaffolding at multiple locations to lift the cables over roads and public rights of way, to prevent them being damaged or obstructed. The Countryside Access and Recreation team must be consulted on these proposals, prior to any works taking place.

6. Temporary site compounds, material stores and environmental measures such as new fencing and watercourses or ponds may also impact on public rights of way and common land. These features must be located to avoid public rights of way.
7. Temporary closures of public rights of way may be required during construction. Details of the phasing and timing of these closures and any alternative routes must be agreed with the Countryside Access and Recreation team before work commences. The developer must also note that there is a lead time of up to 10 weeks to implement a new temporary closure and must plan their activities and liaise with the Countryside Access and Recreation and Streetworks teams accordingly.
8. There is reference to potential tree felling in order to construct and then maintain a standard wayleave. Commercial tree felling operations have the potential to significantly adversely affect public rights of way and access land through the use of large and heavy machinery. It should also be considered that any re-stocking post works will have to ensure that public rights of way are reinstated on the correct alignment to an appropriate standard as specified by the Countryside Access and Recreation team.
9. The proposals may impact on outdoor recreation opportunities within the site, which passes a number of settlements. The importance of public rights of way and other outdoor recreation opportunities for our residents and visitors are highlighted in the Council's Rights of Way Improvement Plan 2018-28, which can be found at <https://en.powys.gov.uk/article/2439/Rights-of-Way-Improvement-Plan>

The Rights of Way Improvement Plan sets out the Council's strategic aspirations in terms of maintaining and enhancing the public rights of way network. Open, waymarked and easy to use paths are key to realising the benefits of public rights of way for health and wellbeing and for their economic benefits.

10. We note that the developer acknowledges the need to explore mitigation in relation to impacts on public rights of way and access to the countryside. The Countryside Access and Recreation team seek the following mitigation:
 - a. That the developer ensures that the public paths within the corridor of pylon and substation works are fully open for use and where appropriate, seeks to enhance the paths e.g. via replacement of stiles with gates and improved drainage and surfacing.
 - b. Section 106 funds to enhance off-site public rights of way and open access land, payable on commencement of development.

The developer can contact the Countryside Access and Recreation team via rights.of.way@powys.gov.uk to discuss the points above.

**AWDURDOD PARC CENEDLAETHOL BANNAU BRYCHEINIOG
BRECON BEACONS NATIONAL PARK AUTHORITY**

Marloes Holtkamp
PEDW

Date: 9 January 2024

Officer: Ffion Bevan

Your Ref:

Our Ref: 23/22425/FRI

Dear Sir/Madam,

Town and Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Proposal: "EIA Scoping Consultation - A 132kV overhead line connection from the proposed Nant Mithil Energy Park to a proposed new substation near Carmarthen - Please respond no later than Tuesday 28th November 2023."

Address: Nant Mithil Energy Park, Builth Wells To Carmarthen,

Thank you for your consultation received 25 October 2023 regarding the above.

Green Generation Energy Networks Cymru Limited (Green GEN Cymru) (The Applicant), a business within the Bute Energy Group, is developing proposals to construct and operate a new 132 kilovolt (kV) grid connection, which at this stage is proposed to be an overhead line (OHL) supported on steel lattice towers as well as an associated switching station in the Builth Wells area. The aim of the Project is to provide a connection between the proposed Nant Mithil Energy Park in Powys (under development by Nant Mithil Energy Park Limited) and the existing National Grid 400kV electricity network in Carmarthenshire. The Project is approximately 96km in length, spanning across land within the jurisdiction of Powys County Council and Carmarthenshire County Council.

The Project will be a 'Development of National Significance' (DNS) in accordance with the Planning (Wales) Act 2015 as an infrastructure development project of national importance to Wales.

The Environmental Impact Assessment (EIA) Regulations make provision for obtaining a Scoping Direction from Welsh Ministers on the information to be included in the Environmental Statement (ES). The Applicant has made a formal request for a scoping direction for the Project in accordance with the EIA Regulations and is accompanied by a Scoping Report. The National Park Authority has been

consulted with a specific request to provide advice on the Scope of the EIA and the proposed methodologies outlined in the Scoping Report.

Set out below is our understanding of the proposal and some background on the BBNPA's policy and legal context.

Our understanding of the proposal

Scoping is an early step in the Environmental Impact Assessment (EIA) process, ensuring the assessment process focuses on the likely significant effects associated with a project. Scoping also provides an opportunity for consultees to comment on the proposed methodologies, identify sources of baseline information and raise any specific issues that they consider require assessment.

The Project will provide a connection between the proposed Nant Mithil Energy Park in Powys and the existing 400kV NETS network in Carmarthenshire. It will also allow future renewable energy projects to connect to the existing network.

The Project is approximately 96km in length, spanning across land within the jurisdiction of Powys County Council and Carmarthenshire County Council.

The Project commences approximately 10km to the north-east of Llandrindod Wells at the Nant Mithil Energy Park substation (which will be consented as a separate project). The Project heads broadly south-west entering the Towy valley and passes to the north of Llandovery and Llandeilo. It crosses the A48 before terminating approximately 6km south of Carmarthen at a new substation being consented separately by National Grid.

The overall approach taken to routeing by Green GEN Cymru is based on the acknowledgement that the main effects of an Overhead Lines (OHL) are landscape and visual. This is due to the scale of the OHL towers relative to the surrounding features in the landscape. As visual effects of OHLs cannot always be mitigated (for example via screening), careful routeing is the primary way in which visual effects may be reduced.

It is stated within the scoping report that *'Other environmental and technical constraints and effects need to be taken into account alongside and balanced with, landscape and visual effect'*. We would disagree with this conclusion in line with the Sandford Principle (outlined in PPW):

"where there is a conflict between these purposes, greater weight shall be given to conserving and enhancing natural beauty, wildlife and cultural heritage".

As such, it is considered that the landscape and visual effect and impact on the special qualities of the National Park should be given appropriate weight.

Potential Effects Scoped into the Assessment

Potentially significant landscape and visual effects that may arise during the construction and operation of the Project, and therefore scoped into the LVIA, are noted below.

Landscape Effects

- Effects during construction on landscape character and locally designated landscapes;
- Effects during operation on landscape character and locally designated landscapes;
- Effects on the special qualities of the BBNP; and
- Cumulative landscape effects during operation with other existing or proposed developments.

Visual Effects

- Effects on the views and visual amenity of people within settlements and communities, including effects on residential visual amenity;
- Effects on views experienced by walkers and cyclists using PRoWs, NCN routes, promoted tourist and/or recreational routes, hill summits, visitors to promoted viewpoints/tourist destinations and recreation areas;
- Effects on people travelling along the road and rail network; and
- Cumulative visual effects associated with the Project seen in combined, successive or sequential views with other existing, consented or proposed developments.

Potential Effects Scoped Out of the Assessment

The following effects are unlikely to be significant, and so are proposed to be scoped out of the LVIA:

- Effects on receptors beyond 3km of the Project, with the exception of very high sensitivity receptors up to 5km from the Project; and
- Receptors that lie outside the zone of theoretical visibility of the project

Background

Policy and legal context

Section 63 of the Environment Act (1995) sets out the statutory purposes of the National Park as follows:-

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and
- To promote opportunities for the public understanding and enjoyment of the special qualities of the National Park

In accordance with section 62(2) of the Environment, any relevant Authority shall have regard to National Park purposes when performing any functions in relation to, or so as to affect, land in a National Park. Relevant Authorities include public bodies, government departments, local authorities and statutory undertakers.

The Special Qualities of the National Park may be significantly impacted by development proposals on the fringes of the National Park. The Brecon Beacons National Park Management Plan 'Future Bannau 2023-2028 defines the Special Qualities of the Brecon Beacons National Park as follows:

The Bannau Brycheiniog National Park has ten defined special qualities grouped around landscape, community, experiences and wildlife.

- **Sweeping grandeur & outstanding natural beauty.** The National Park's sweeping grandeur and outstanding natural beauty observed across a variety of harmoniously connected landscapes, including marvelous gorges and waterfalls, classic karst geology with limestone pavement, caves and sink holes, contrasting glacial landforms such as cliffs and broad valleys carved from old red sandstone and prominent hilltops with extensive views in all directions. A landscape that provides a sense of time depth and timelessness.
- **Contrasting patterns, colours and textures.** A working, living "patchwork" of contrasting patterns, colours and textures comprising well-maintained farmed landscapes, open uplands, lakes and meandering rivers, punctuated by small-scale woodlands, country lanes, hedgerows and stone walls and scattered settlements. grouped around landscape, community, experiences and wildlife.
- **A sense of place and cultural identity.** A sense of place and cultural identity - "Welshness" - characterised by the indigenous Welsh language, religious and spiritual connections, unique customs and events, traditional foods and crafts, relatively unspoilt historic towns and villages, family farms and continued practices of traditional skills developed by local inhabitants to live and earn a living here, such as common land practices and grazing.
- **An intimate sense of community.** An intimate sense of community where small, pastoral towns and villages are comparatively safe, friendly, welcoming and retain a spirit of cooperation.
- **Enjoyable and accessible.** Enjoyable and accessible countryside with extensive, widespread and varied opportunities to pursue walking, cycling, fishing, waterbased activities and other forms of sustainable recreation or relaxation.
- **Sense of discovery.** A sense of discovery where people explore the National Park's hidden secrets and stories such as genealogical histories, prehistoric ritual sites, relic medieval rural settlements, early industrial sites, local myths and legends and geological treasures from time immemorial.
- **Sounds, sights, smells and tastes.** A feeling of vitality and wellbeing that comes from enjoying the National Park's fresh air, clean water, rural setting, open land and locally produced foods.
- **Peace, tranquillity darkness.** A National Park offering, dark, night time skies, peace and tranquillity with opportunities for quiet enjoyment, inspiration, relaxation and spiritual renewal.
- **Mosaic of diversity.** The geology and climate vary greatly across the Park creating an elaborate patchwork landscape rich in biodiversity. The Park hosts heathlands, grasslands and woodlands, with

uplands and lowlands, natural lakes and riparian habitats. The Park contains limestone pavement and blanket bogs of international and national importance. Several endangered species survive in the Park, including some for which the Park is their furthest extent of their natural range.

- **Living landscape.** An abundance of wildlife thrives in semi-natural habitats that have been lived in and shaped by human settlement for millennia. The landscape is interlaced with ancient hedgerows bustling with life, enclosing wildlife-rich hay meadows, and primeval woodlands that cloak some steep-sided valleys. Veteran trees adorn the landscape, carrying the scars of centuries of changing dependency on their resources. Heather-dominated uplands maintained through grazing by horses, sheep and cattle are a testament to the intimate relationship between biodiversity and farming.

Planning Policy Wales (PPW) (Edition 11) states at para 6.3.5 -6.3.6 *"the statutory landscape designations that apply in Wales are National Parks, and AONBs. Planning authorities have a statutory duty to have regard to National Parks and AONB purposes. This duty applies in relation to all activities affecting National Parks and AONBs, whether those activities lie within, or in the setting of, the designated areas. The designated landscapes should be drivers of the sustainable use and management of natural resources in their areas, and planning authorities should have regard to their identified special qualities in the exercise of their functions and any relevant management plans.*

In National Parks, planning authorities should give great weight to the statutory purposes of National Parks, which are to conserve and enhance their natural beauty, wildlife and cultural heritage, and to promote opportunities for public understanding and enjoyment of their special qualities. Planning authorities should also seek to foster the social, economic and cultural well-being of their local communities".

PPW para 6.3.9 states *"The special qualities of designated areas should be given weight in the development planning and the development management process. Proposals in National Parks and AONBs must be carefully assessed to ensure that their effects on those features which the designation is intended to protect are acceptable. The contribution that development makes to the sustainable management of the designated area must be considered"*.

[Underlining our emphasis]

Underground Cabling

The Scoping Report outlines the potential for underground cabling and states that 'In determining where along the Scoping Corridor it is appropriate to consider underground cables (UGC), Green GEN Cymru will firstly identify those areas that are subject to the greatest visual impacts (or impacts upon setting) before subsequently considering the capacity of the receiving environment to receive such an excavation. UGC will be considered in the most sensitive landscape areas or where the presence of OHL will be particularly dominant and impactful upon visual receptors'.

It is strongly requested that consideration should be given to UGC in areas where, based on evidence, the OHL will have a significant effect on the National Park and its setting.

Scoping Report

We consider the key issues which have the potential to impact on the National Park Authority's statutory purposes and special qualities are primarily in relation to landscape and visual impact, cultural heritage, tranquillity and ecology.

Table 7.2 of the Scoping Report outlines the proposed Scope of the EIA and it is noted that the BBNP has been identified and scoped in for the indirect effects on the special qualities of the BBNP. It has outlined that these qualities will be considered. 'Theoretical inter-visibility with the Project would be described in the assessment and used as a means of identifying which special qualities require assessment if significant effects are deemed likely'.

It is considered that the further assessment and detail will be required including the following:

1 **Landscape and Visual Impact Assessment (LVIA)**

The impact on the special qualities and setting of the National Park to be included within the LVIA. The study area must include key views from within the Park, and the 3km buffer might need to be extended to accommodate the potential long-distance views from within the park boundary.

2 **Dark Skies:** There will be a need for visualisations regarding lighting and the impact on the Dark Sky Reserves.

3 **Viewpoints:** There is no indication within this section of Table 7.2 of where Preliminary Viewpoints within the National Park Authority might be, as highlighted in other sections of the table. The National Park would welcome discussion on potential viewpoints to be included within the LVIA. These viewpoints would determine whether the proposal would have a significant visual and landscape effect.

4 **Special Qualities Assessment:** Full consideration of the Special Qualities (SQs) of the National Park in the context of landscape and visual effects will be required. It is noted that the Special Qualities of the BBNP refer to the Bannau Brycheiniog National Park Management Plan 2010-2015. The new Management Plan 'Future Bannau' 2023 – 2028 has been adopted.

5 **Cumulative:** Reference is made to the cumulative impact of similar proposed developments, and such large development of National Significance on the National Park boundary is of concern. Further detailed cumulative impact on the National Park Boundary should be considered. In combination effects will need to be identified and reported in the most relevant chapter, cross-referenced where necessary and appropriately summarised.

Cultural Heritage

The Scoping Report identifies and references a number of historic assets that are within the Scoping corridor. In line with the special qualities of the National Park, full assessment of the assets within the Park boundary, which are deemed to be significantly impacted, will need to be considered.

Ecology

The Scoping Corridor does not fall within the boundary of the BBNP, which is of concern, given its close proximity in some areas. However, it's doubtful that we would raise specific ecological issues/concerns in relation to impacts on the ecology of the National Park as NRW and the other LPA Ecologists would be best placed to advise on impacts within and adjacent to the corridor.

Conclusion

Based on the comments above, the BBNPA considers that further consideration should be given to the potential visual and landscape impact of the development on the setting and special qualities of the National Park. Concern is raised in relation to the scale and size of the Scoping corridor and buffer zone, and whether this is sufficient to assess the potential significant impact on the National Park.

In those areas, which are deemed significantly sensitive, underground cabling would be our preferred option.

No reference has been made to the Bannau Brycheiniog Management Plan 'Future Bannau' 2023 – 2028 within the Scoping Report, however the BBNPA considers the main areas of concern would be the impact on three of the Special Qualities of the Park:

- *"sweeping grandeur and outstanding natural beauty",*
- *"peace, tranquillity and darkness"*
- *"Contrasting patterns, colours and textures"; and*

We also feel that further consideration and assessment is required for the other Special Qualities relating to –

- *"Sense of discovery".*
- *"A sense of place and cultural identity"*
- *"Sounds, sights, smells and taste"*
- *"Enjoyable and accessible"*
- *"Mosaic of diversity"*
- *"Living landscape"*

We trust the above comments are of assistance however if you wish to discuss any aspect further please do not hesitate to contact me.

Thank you for your consultation regarding the above.

Yours faithfully,



Gareth Jones
Director, Planning and Place

Yr ydym yn croesawu gohebiaeth yn y Gymraeg. Bydd unrhyw ohebiaeth yn y Gymraeg yn cael ei ateb yn y Gymraeg a ni fydd unrhyw gyswllt trwy gyfrwng y Gymraeg yn arwain at oedi yn y mater sy'n cael ei drin.

We welcome correspondence in Welsh. Any correspondence in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in the matter being dealt with.

Ein cyf/Our ref: CAS-241272-C7L7
Eich cyf/Your ref: CAS-02379-G1Z10

Planning and Environment Manager
Crown Buildings, Cathays Park
Cardiff
CF10 3NQ

Dyddiad/Date: 28 November 2023

Annwyl Syr/Madam/Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990 THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT (WALES) REGULATIONS 2017

POTENTIAL DNS APPLICATION: GREEN GEN TOWY-USK PROJECT PROPOSED DEVELOPMENT: A 132 KV OVERHEAD LINE CONNECTION FROM THE PROPOSED NANT MITHIL ENERGY PARK IN THE RADNOR FOREST AREA OF POWYS TO A PROPOSED NEW SUBSTATION NEAR CARMARTHEN.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) on the scoping opinion request for the above proposed development which we received on the 24 October 2023.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent planning applications or on the submission of a more detailed scoping report or the full Environmental Statement (ES). At the time of any planning application there may be new information available which we will need to consider in making a formal response.

These comments include those matters Natural Resources Wales (NRW) consider will need to be taken into consideration and applied to the Environment Impact Assessment (EIA) and the resulting ES. Our comments are set out below following the chapter order in the Scoping Report (SR).

The ES for this development should include sufficient information to enable you to determine the extent of any environmental impacts arising from the proposed scheme. Evaluation of the impacts of the scheme should include direct and indirect; secondary; cumulative; short, medium, and long term; permanent and temporary; positive and negative, and construction, operation phase.

We welcome the submission of the following report and the associated documents provided on your website.

Green Gen Cymru, Green Gen Towy Usk, Scoping Report dated October 2023.

Chapter 3 - Project Description

Section 3.10-3.16 and Section 3.30 - Once method statements are available, road and underground cabling of watercourse crossings will need further consultation with NRW on the potential impacts to fish caused by disturbance, pollution, obstruction, or changes to habitat availability.

Chapter 6 - Our Approach to Topics Not to be Included in the EIA

Section 6.24 – 6.27 – We note that there is no reference to the Well-being of Future Generations (Wales) Act 2015, the applicant may wish to include this and review as relevant.

Section 6.44 - Decommissioning contains links to the Climate Change considerations. We note the following:

Section 6.44 - *When the operational life of the Project ends, which is assumed to be 80 years, it is possible the Overhead line (OHL) may be re-equipped with new conductors, insulators and refurbished. However, the OHL may also be fully decommissioned. The activities involved in decommissioning the Project will broadly reflect those used for construction of the Project (with the exception of any felling which is likely to be 'replaced' with re-planting woodland areas and other biodiversity net gain).*

Section 6.45 - *It is proposed that decommissioning is scoped out of the Environmental Statement (ES) as the Project has a lifespan of at least 80 years after which the OHL may be refurbished or decommissioned and removed. Neither of these activities is likely to have significant effects over and above those of the operational and maintenance phases of the Project and therefore study within the ES is not justified and warranted".*

There is the potential that, in at least 80 years' time when decommissioning or repurposing is being considered, conditions across route of the OHS may have changed as a result of a changing climate and be subject to more extreme weather events. We recommend that it is not assumed that conditions during proposed activities will remain the same as they are in the current day; this is of particular importance when considering any below ground intrusive activities which may encounter groundwater, such as dewatering requirements etc.

Questions for Consultees

Q6.1: Are the proposed topics to be scoped in/out appropriate?

We note Climate Change has been scoped out, however we also note that Section 6.23 states "Consideration of this topic [Climate Change Impacts Relevant to Adaption] will be given within relevant environmental topic chapters in the ES where applicable. This includes the identification of the likely consequences on the following: Consequences of climate change for baseline conditions / assessment findings; and the resilience of mitigation measures to any projected changes in extreme weather, including heavy rainfall events. It does not appear that climate change considerations have been considered within Chapter 13: Ground Conditions. We recommend that the potential impacts of a changing climate throughout the life cycle of the project (construction and operation) should be considered; extreme weather events have the potential to impact upon the hydrogeological regime, which in turn may have implications for factors such as the potential mobilisation of

contamination, particularly from sources such as landfills etc. We recommend that should be a consideration within the main ES report.

Chapter 7 - Landscape and Visual Amenity

Our landscape planning advice relates to the development's potential impact on Bannau Brycheiniog National Park (BBNP). The Scoping Corridor is located 270m to the north-west of the BBNP at its nearest point.

We have reviewed Chapter 7 Landscape Visual Impact Assessment (LVIA) within the submitted EIA Scoping Report, October 2023, prepared by LUC. Our comments below respond to questions on landscape and visual matters which begin at page 37 of the Scoping Report.

Questions for Consultees

Q7.1: Is the proposed LVIA Study Area (3km buffer on either side of the nominal centre line of the final alignment and 1km buffer on either side of the nominal centre line of UGC sections) considered appropriate?

We understand the LVIA Study Area depicted on Figure 7.1 is based on a 3km distance from the Scoping Corridor as the final alignment is not yet fixed. Whether or not 3km is adequate for the final study area will depend on the extent of landscape that is likely to be impacted by the proposals, and this should be informed by evidence, yet to be completed, including zone of theoretical visibility analysis (ZTV) and fieldwork. The extent of the study area may change as this work progresses.

Guidance on appropriate search and study areas is contained in NRW Guidance Note 46: *Using LANDMAP in Landscape and Visual Impact Assessments* can be found at the following [Natural Resources Wales / Using LANDMAP in Landscape and Visual Impact Assessments GN46](#)

For vertical structures between 26m to 49m the recommended search area is 4-8km and the recommended study area is 2-5km. Although individual pylons would be 27m tall, the scale of the overall transmission corridor is such that a precautionary approach should be used, particularly with regards to the inclusion of land within the BBNP. Including that which lies outside of the current Study Area, but which may have elevated views of the Project. We note it is intended to include viewpoints up to 5km from the Project (paragraph 7.7). If significant impacts are anticipated within 5km of the Project, then the final study area should reflect this.

Q7.2: Is the proposed approach and scope for the assessment of effects on landscape character, based on a project specific local landscape character assessment (drawing on LANDMAP), considered to be appropriate?

Assessors carrying out LVIA need to judge the appropriate scale of reporting for the development, which may not always be the reporting scale of LANDMAP. We agree that a Project specific local landscape character assessment is likely to be the most appropriate approach in this case. We recommend that LANDMAP is used as the starting point for creating suitably scaled character-based reporting units. Following good practice in

landscape character assessment, further detail, refinement, updating and field work should be included when confirming reporting unit boundaries.

The LVIA will consider the potential for the Project to affect special qualities of the BBNP, and the overall purposes of the National Park designation. We advise that the stated special qualities of the BBNP are only 'headlines. Therefore, an assessment of the impacts on these qualities and National Park purposes, particularly the conservation and enhancement of natural beauty, must be informed by a detailed consideration of supporting evidence, including existing published landscape character information and site survey. The purpose of which should be to identify characteristics and aspects which make a positive contribution to the headline special qualities and to determine whether or not these would be affected by the proposals, and how so. NRW cautions against an assessment approach based on an aggregate of all special qualities as this can lead to impacts on individual special qualities being missed or underestimated. Special qualities should be assessed individually.

Q7.3: Is the proposed approach and scope for the assessment of visual effects appropriate?

We agree that the general approach and scope for the assessment of visual effects outlined in the Scoping Report is appropriate and offer the following comments.

It is proposed to scope in effects on views experienced by walkers and cyclists using PROWs, NCN routes, promoted tourist and/or recreational routes, hill summits, visitors to promoted viewpoints/tourist destinations and recreation areas (paragraph 7.44 sixth bullet). We expect this group will capture the most sensitive visual receptors within the BBNP and its setting. With regards to the impacts on the views and visual amenity of users of promoted and recreational routes, we advise the assessment should also describe the sequential impacts which would occur along affected sections.

Potential effects to be scoped out of the assessment are addressed at paragraph 7.45. This includes receptors beyond 3km but '*very high sensitivity receptors up to 5km from the Project*' will be scoped into the assessment (paragraph 7.45 first bullet). We note that the LVIA will not record sensitivity judgements greater than '*high*' (paragraph 7.31). Therefore, we assume receptors beyond 3km which have high sensitivity will be included. In general, visual receptors visiting hill summits within the BBNP will have a high sensitivity and therefore potential impacts at hill summits within 5km of the Project should be carefully considered.

Q7.4: Do consultees consider that the proposed viewpoints are appropriate to inform the visual assessment, subject to further viewpoints being agreed based on the developed route proposal, and that the suggested presentation of visualisations is appropriate?

Table 7.1 sets out the preliminary LVIA viewpoints which include one viewpoint within the BBNP - Viewpoint 18 (Carn Goch). Other viewpoints are located within the immediate setting of the BBNP, including Viewpoints 16, 17, 19 which are located within the Tywi Valley Special Landscape Area. This valley forms the immediate setting to the northwestern parts of the BBNP and includes LANDMAP Visual and Sensory Areas: Dyffryn Tywi Valley sides south, Dyffryn Tywi flood plain, and Dyffryn Tywi valley sides north, which all have an Outstanding evaluation (Figure 7.7). These areas are described as being largely un-spoilt and scenically attractive with views over Dyffryn Tywi and towards the Brecon Beacons in places.

The Scoping Corridor includes parts of the Dyffryn Tywi and aligns broadly parallel to the entire northwestern boundary of the BBNP. The LVIA Scoping Area includes land within the BBNP, all of which lies within *Landscape Character Area 1 Towy Valley Foothills*, described in the *Brecon Beacons National Park Landscape Character Assessment, 2012*. In this context, we advise one viewpoint from within the BBNP is unlikely to be sufficient to represent the range of views available from the western parts of the BBNP. The final selection of viewpoints will need to be informed by ZTV analysis, and potentially preliminary wireframes. It is likely that Dyffryn Tywi will be one of the most sensitive sections of the Project, where undergrounding may be deemed necessary. Should undergrounding occur, this may negate the need for some viewpoints (paragraph 7.38).

We welcome the proposed approach to undertake field surveys in both summer and winter months and the intention for all viewpoint photography to be captured when trees are not in leaf (paragraph 7.30).

Visualisations will be prepared and presented in accordance with the Landscape Institute's *TGN 06/19 Visual Representation of Development Proposals*, which is the appropriate guidance. At this stage it is not clear which viewpoints will be used for the preparation of visualisations and we would welcome the opportunity to review draft locations in advance of preparation.

We advise Figures 7.9a-e: *Visual Receptors and Preliminary Viewpoint Locations* are difficult to read due to the low resolution of base mapping. Future versions should be of a higher resolution and/or split across more pages and all should show the BBNP boundary.

Q7.5: Is the approach to inclusion of schemes within the cumulative assessment appropriate?

We are satisfied with the general approach outlined in Chapters 7 and 16 of the ES Scoping Report for the cumulative assessment.

Q7.6: Is the approach to the assessment of effects on residential visual amenity appropriate?

The intention is to prepare Residential Visual Amenity Assessments (RVAA) in accordance with the Landscape Institute's guidance *Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19*. We advise this is the appropriate guidance.

Q7.7: Do consultees agree with the effects to be scoped out of the LVIA?

We are satisfied with the receptors to be scoped out of the LVIA, namely all receptors beyond 5km from the Project and receptors falling outside of the ZTV (paragraph 7.45).

Chapter 8 – Biodiversity

In general, the ES for this scheme should include sufficient information to enable the local planning authorities to determine the extent of any environmental impacts arising from the proposed scheme on legally protected species, including those which may also comprise notified features of designated sites affected by the proposals.

Evaluation of the impacts of the scheme should include; direct and indirect; secondary; cumulative; short, medium, and long term; permanent and temporary; positive and negative,

and construction, operation and decommissioning phase and long-term site security impacts on the nature conservation resource, landscape, and public access.

Description of the Project

Within the ES, the proposed scheme should be described in detail in its entirety. This description should cover construction, operation, and decommissioning phases as appropriate and include detailed, scaled maps and drawings as appropriate.

We would expect the description to include:

- The purpose and physical characteristics of the proposals
- Location, development size and configuration of the development including flexibility of the site layout
- Procedures for good working practices
- Identification of appropriate pollution contingency and emergency measures for watercourses on site
- Timing of all works and contingency plans should slippage in the programme occur
- Maintenance requirements of structures
- Maintenance of any habitats within the site
- Artificial lighting requirements, including likely intensity and location of light spill on green infrastructure.

Illustrations within the Environmental Statement

Any maps, drawings and illustrations that are produced to describe the scheme should be designed in such a way that they can be overlaid with drawings, illustrations and aerial photographs produced for other sections of the ES such as biodiversity.

Description of Biodiversity

The ES must include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed scheme together with a detailed assessment of the likely impacts and significance of those impacts.

Key Habitats

Any habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). We advise that Phase 1 surveys are undertaken and completed during the summer to ensure the best chance of identifying the habitats present.

Protected Species

Sites Surveys

We advise the scheme is subject to assessment to determine the likelihood of protected species being present in the area and likely to be affected by the proposals. Targeted species surveys should be undertaken for all species scoped in and:

- i. Be undertaken by qualified, experienced, and where necessary, licensed ecologist; and
- ii. comply with current best practice guidelines. In the event that the surveys deviate from published guidance, or there are good reasons for deviation, full justification for this should be included within the ES.

Up to date survey information should be included in the ES and advise that the full details are provided as an appendix to the ES.

Whilst we largely concur with the scoping report regarding the protected species to be scoped in/out, we would also look to the extended Phase 1 habitat surveys to guide the need for any additional protected species surveys.

We note targeted species surveys are proposed for badger, otter, red squirrel, pine marten, dormouse, and great crested newt.

Bats

We note that Section 8.28 of the report refers to 'detailed forestry and woodland surveys of woodland blocks. It is unclear what is meant by this, and we would advise an assessment of the potential to support bats is undertaken.

We recognise that there will need to be a staged approach to survey of trees and woodlands that may be impacted by the scheme and that the proposal is still at the potential route options/corridor stage. We advise that the ES is initially supported by a minimum of static surveys of woodlands and likely flight corridors, to determine bat activity and species across the scheme with a commitment to survey trees for potential roost features and climbing surveys to inform the final route selection.

We advise that an assessment of the potential impacts from clearing vegetation/habitats below the line is included in the ES and measures to offset or manage this.

Where tree roosting features are likely to be impacted by the scheme, we advise that surveys include a climbed inspection of any trees identified as having medium/high potential roosting features.

Dormouse

We welcome that dormouse surveys are proposed between April and November. However, it is unclear what the scope of the surveys are. We advise that surveys are undertaken following published guidance and include more than one survey method, such as nest boxes, nest tubes and footprint tunnels.

GCN

We note from the scoping report that a habitat suitability index (HSI) survey of ponds within 500m of the project is proposed to assess their suitability for use by great crested newt (GCN).

We welcome from Section 8.35 of the report that towers and associated works will be positioned to avoid waterbodies (ponds, ditches). However, as recognised in the scoping document there will be a need to undertake a survey in order to inform an assessment of the impacts of the scheme on GCN terrestrial habitat. In this context, it is proposed to base the need for GCN presence/absence surveys on an assessment of pond Habitat Suitability Index data (HSI data), data search results and presence of suitable (connected) terrestrial habitat.

We advise that the surveys do not rely on HSI data to determine the need for presence/absence survey, but that eDNA surveys are also carried out of waterbodies within the preferred corridor.

Furthermore, if the proposed development is within 250m of a pond used by GCN, and the development cannot be designed to avoid the area, the eDNA survey should be followed up

with a suite of traditional surveys to determine the population concerned as per the guidance set out in

- *Great Crested Newt Mitigation Guidelines* by English Nature dated 2001.

Otters

We welcome that specific surveys for otters are proposed and advise that the assessment ensures that habitats are assessed for their potential to support breeding sites for this species. The surveys should include an assessment of potential for otter holts, evidence of slides, couches, sprainting and mammal commuting routes. Note that potential breeding sites may be away from river corridors and that trail/activity cameras may be required to confirm the significance of any evidence.

In addition, we welcome that a walkover for water vole signs will be included as part of the otter survey.

Impact Assessment

Should protected species be found during the surveys, information must be provided identifying the species-specific impacts in the short, medium, and long term together with any mitigation and compensation measures proposed to offset the impacts identified.

We advise that ES considers significance (both alone and in combination) and where applicable conservation status. In respect of European Protected Species, we advise that the ES demonstrates that the proposal will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range (FCS) during construction, operation, and decommissioning phases of the scheme.

Where proposals implicate protected species which are also notified features of designated sites, we advise that the ES considers the impacts on those species from both perspectives.

We advise that the ES sets out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long term financial and management responsibility. Where the potential for significant impacts on protected species is identified, we advocate that a Conservation Plan is prepared for the relevant species and included as an Annex to the ES.

European Protected Species (EPS) Licence

Where a European Protected Species is identified and the development proposal will contravene the legal protection they are afforded, a licence should be sought from NRW. The ES must include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended).

Where a European Protected Species is present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

- (a) It satisfies an appropriate derogation or licencing purposes, which in the case of development is most likely to be preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;

- (b) There is no satisfactory alternative and
- (c) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

These requirements are also translated into planning policy through Planning Policy Wales (PPW) February 2021, section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The local planning authority will take them into account when considering the ES where a European Protected Species is present.

Local Biodiversity Interests

We recommend that the developer consults the local authority Ecologist on the scope of the work to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan and are that are considered important for the conservation of biological diversity in Wales.

We would expect the developer to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (E.g., bat groups and mammal groups).

Securing Biodiversity Enhancement

We also advise that, in accordance with the Environment (Wales) Act 2016 and Planning Policy Wales, the application demonstrates how it can deliver biodiversity enhancements and thus contribute to promoting ecological resilience. This is reaffirmed in the Welsh Government letter of 23/10/19 to all Chief Planning Officers.

Fish

Section 8.21- Salmon and Freshwater Fisheries Act (1975) should be included within the Legislation and Guidance to be considered in future Ecological Assessment. Adherence with this piece of legislation will mean consideration of in-river working embargo periods for new or upgrades to existing watercourse crossings.

Section 8.22 - 'Guidance on best practice watercourse crossings to avoid impact on ecology and/or geomorphology' needs to be included.

Section 8.69 - The proposed Construction Environmental Management Plan (CEMP) should specifically take account of biosecurity to avoid transmission of invasive species.

Questions for Consultees

Q8.1: Do consultees agree that the scope of desk studies and ecological baseline surveys proposed are sufficient and proportionate to inform the design and assessment of the Project?

Extract from Scoping report: Section 8.3

'Desk study

- *Internationally designated areas: 5km for Special Area of Conservation (SAC); 10km for Special Protection Areas (SPA); on terrestrial sites (SACs), impacts unlikely more than 5km away, but for SPAs where there may be complex flight lines to consider. These buffers are generally accepted in Habitat Regulation Assessment (HRA) terms;*

- *Nationally designated areas and non-statutory designated sites: 1km; these sites are numerous and 1km is a reasonable buffer to assess significance;'*

We agree with the proposed buffers to assess likely significant effects on statutory designated sites. We welcome the inclusion that buffers will be updated as the proposed design progresses.

There is limited information with regards to how the assessment of statutory designated sites and their features within and outside the scoping corridor will be considered. While we note the identification of SACs within Carmarthenshire which either fall within the scoping corridor or buffers and the notes regarding potential impacts, the information regarding Sites of Special Scientific Interest (SSSI's) falling within the scoping corridor and 1km buffer is limited and a number of sites are identified rather than a list of sites. Figure 8.1: Statutory and Non-statutory Designated Sites shows some Carmarthenshire SSSI's fall within the scoping corridor, however we note that these are not identified in the report.

We are unable to make site specific comments regarding the infrastructure proposal at this stage, as the detail regarding the location of the proposals is not available. The scoping corridor may hold habitats of principle importance for the purpose of maintaining and enhancing Wales's biodiversity as set out by the Environment (Wales) Act 2016. Section 7 of the Act includes the duty whereby Welsh Ministers must take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section and encourage others to take such steps.

In Section 8.24 there is no mention of using the NRW dataset Phase 1 maps to detect potential Section 7 Priority Habitat. We also has Phase 2 datasets for grassland, woodland, peatland, and heathland that can be used to inform the OHL location within the scoping corridor. In Section 8.25 it says that surveys will be conducted within the defined study area. Is this the entire corridor or simply checking of the current Phase 1 maps? A list of Groundwater Dependant Terrestrial Ecosystems (GWDTEs) is needed as W9 woodland is considered to be a GWDTE and should not be omitted. Referral to NRW Lower Plant Specialist should be made to determine a low impact route through Dinefwr Deer Park, which is a site of Welsh importance for its lower plants (lichens) and also the Invertebrate Ecologist for locations of trees with saproxylic interest. All areas of ancient woodland and especially Ancient Semi-natural woodland should be avoided as it is an irreplaceable resource.

We agree that overall, the scope of the ornithological work is appropriate. We recommend that the Vantage Point (VP) surveys follow NatureScot guidelines for this type of survey. Details of collision risk assessment will be needed especially where SPA features may be concerned. Overall, we agree with the ornithological receptors that are scoped in, however recommend that operational phase is scoped-in in relation to protected sites at this stage.

Q8.2: Do consultees agree with the assessment method (including scoped in/scoped out effects)

The scoping report does not appear to have a specific section referring to collection and assessment of data regarding Statutory Designated Sites. Will this therefore fall within the '*Data Collation and Assessment Methodology: Ecological*' section on page 43 to 47?

From a Carmarthenshire Statutory Designated Sites perspective, we would advise that Otter surveys are undertaken to best practice guidelines to inform the proposed Habitats Regulations Assessment regarding the Afon Tywi Special Area of Conservation.

We note and welcome Section 8.66 *There will be a particular focus on avoiding direct impacts on the sites designated for nature conservation purposes (i.e., described above) and significant impacts on protected species and habitats of conservation concern.*’ from the Likely Significant Effects section on page 50.

We note and welcome the inclusion of standard good practice mitigation measures outlined by Section 8.69 on page 50 of the scoping report such as:

‘The production of Species Protection Plans (SPPs) where appropriate, which may include the rigors of the species licencing process. The species licencing process requires detailed and targeted mitigation, and if necessary, biodiversity compensation;

- *The development and application of a CEMP, which will set out guidance on compliance with nature conservation legislation and policy;*
- *Production of a Pollution Prevention Plan (PPP) as part of the CEMP and adherence to Guidelines on Pollution Prevention*

(GPPs), which will significantly reduce the likelihood and severity of pollution events and associated impact to water ecology;’

Pollution prevention measures will likely be important factors to include/consider within the HRA regarding the Afon Tywi Special Area of Conservation.

Potential Effects Scoped into the Assessment - Ecological

Section 8.74 - *The assessment will consider the following potential effects:*’ We welcome the following aspects being scoped into the assessment:

- *Direct and indirect effects on statutory designated areas for nature conservation purposes as a result of construction phase of the Project (i.e., SACs and SSSIs)*
- *HRA.*

We note that Section 8.75 advises ‘A separate HRA Screening and Appropriate Assessment Report (if required) will be produced in parallel with the Environmental Statement to assess Likely Significant Impacts on European Wildlife Sites (SACs, SPAs) and potential sites.’

The outcomes of any HRA Screening and Appropriate Assessment (if required) should be incorporated into the Environmental Impact Assessment.

Potential Effects Scoped Out of the Assessment - Ecological

Section 8.76 - *The following effects are proposed to be scoped out of full assessment:*

- *Direct and indirect effects on statutory designated areas for nature conservation purposes as a result of the operation of the Project on the basis that there will be limited land take and minimal ongoing disturbance following construction.*
- *Direct and indirect effects as a result of the operation of the Project on non-avian protected and notable species on the basis that potential impacts will be managed through implementation of a Species Protection Plans (SPP), which will include pre-works checks and, if necessary, timing restrictions and buffer distances and protected species licencing to ensure legal compliance.’*

We note that the above points are scoped out with regards to operation of the proposals, and while this may ultimately become the case, we would advise that the assessment retains

the scope to consider the potential impacts upon sensitive ecological receptors until these receptors are screened out by consideration of desktop and field survey information for all phases of the proposal including maintenance. As more detailed information comes to light with regards to the proposal, its location and ecological surveys, the assessment of impacts may alter.

We note that the Scoping corridor overlaps or crosses the Afon Tywi River corridor in places. We advise that consideration of Geomorphology/Hydromorphology will be an important consideration in these areas ensuring the proposals take into consideration the natural movement of the river so that proposed infrastructure is not under future threat, resulting in a requirement to protect assets which may impact upon the Afon Tywi SAC.

We suggest that woodlands should be retained in the scope for a full assessment as there is a proposed 70m wayleave that potentially will have large impacts on woodland the OHL passes through.

Overall, we agree with the ornithological receptors that are scoped in, however we recommend that the operational phase is scoped-in in relation to protected sites at this stage.

Q8.3 Do consultees hold any data sets that could be made available to inform the assessment?

As mentioned above in Q8.2 we hold Phase 2 survey datasets for important grassland, heathland, peatland, and woodland sites across the scoping corridor, not just those on protected sites but also in the wider countryside. The unified peat layer available on Datamap Wales should be used for potential deep peat locations, but Phase 1 should also be used to detect areas of deep peat not on that GIS layer. Detection of deep peat by looking for areas of Bog, Fen, Valley mire etc.

We would also advise the applicant visits the following page on our website which provides a short explanation of the different places to search for data [Natural Resources Wales / Access our data, maps and reports](#)

The main places to look are DataMapWales [Home | DataMapWales \(gov.wales\)](#) and our metadata catalogue [OLIB Folio \(naturalresources.wales\)](#). Some of these will be reports and some will be data.

There is also the NBN Atlas which will probably also be of interest to this applicant [Home - NBN Atlas Wales](#).

When the applicant has identified the specific data/reports they require, they can then submit a request for the information from our Data Distribution Team at the following link datadistribution@naturalresourceswales.gov.uk

Q8.4 Do consultees agree with the proposed bat surveys and the approach to the assessment

Please see our comments above on the need for bat surveys and assessments.

Chapter 12 - Water Resources

Water Quality

Proposed Scope of the ES Table 12.1

We disagree with Table 12.1 proposed scope; construction should be scoped in for Water quality and potentially for Hydrology too given the applicant doesn't know the exact locations of any of the towers at present. The potential impact from these works could be quite significant. We agree that construction should be scoped out for Operation.

Water Framework Directive (WFD)

We note in section 12.16 the report advises that implementation of future cycles of Water Framework Directive (WFD) management plans driving future improvements in the ecological and chemical quality of water bodies would also be considered, which we would welcome in the ES.

Questions for Consultees

Q12.1: We have assumed that infrastructure to support the transmission (towers etc) will be deemed as water compatible or if not, as essential infrastructure. Please could you confirm that this approach is acceptable?

We cannot comment without knowing the details of each proposal. If structures are galvanised this might have localised impacts that will need to be considered.

Q12.2: Given the very localised nature of proposed permanent ground-based infrastructure e.g., towers, we assume that formal drainage arrangements will not be required with incidental water returned to ground adjacent to the structure. Please could you confirm that this approach is acceptable?

Yes provided 'incidental water' is clean and unpolluted by silts or oils. If the applicant is proposing de-watering, they will need to apply for an abstraction license.

Q12.3 Are you in agreement that the proposed desk and field surveys are sufficient for the purposes of the EIA?

See comments to Q12.1.

Flood Risk

Questions for Consultees

Q12.1: We have assumed that infrastructure to support the transmission (towers etc) will be deemed as water compatible or if not, as essential infrastructure. Please could you confirm that this approach is acceptable?

We consider the proposed utility infrastructure clearly fits into the definition of 'Less Vulnerable Development', as contained within the existing Technical Advice Note (TAN15).

Whilst we provide our advice on development vulnerability categorisation, this is primarily a matter for the Local Planning Authority (LPA) to consider with further advice from Welsh Government if required.

Q12.2 Given the very localised nature of proposed permanent ground-based infrastructure e.g., towers, we assume that formal drainage arrangements will not be required with incidental water returned to ground adjacent to the structure. Please could you confirm that this approach is acceptable?

This is a matter for the Lead Local Flood Authority and SuDS Approval Body within the relevant local authority.

Q12.3 Are you in agreement that the proposed desk and field surveys are sufficient for the purposes of the EIA?

Overall, yes, we agree that the proposed desk and field surveys are sufficient for the purpose of the EIA.

We would support the proposal to locate towers and associated infrastructure outside of the mapped Flood Zones wherever possible.

Reference in the Scoping Report needs to be made to TAN 15 and the Flood Map for Planning (FMfP). Our Development Flood Risk (DFR) Team will review all information submitted as part of the planning application process for compliance with TAN15.

The Scoping Report acknowledges the potential requirement for FRAPs, depending on location of particular infrastructure elements and the effect they may have on the main river. We would appreciate and encourage early engagement with the DFR Team to discuss these requirements.

We would expect the Flood Risk Assessment (FRA) to assess the risk and consequences of flooding on the development; and the risk and consequences (i.e., the overall impacts) of the development on flood risk elsewhere. In addition, it must consider NRW'S ability to access, maintain and improve our Flood Risk Management (FRM) assets.

Hydrology

The three distinct phases of this project – Construction, Operation, and Decommission, should be considered independently within the Environmental Impact Assessment (EIA). It is often within the Construction and Decommission phases however that the potential for unwanted environmental effects is the largest.

The development should avoid interception of subsurface drainage by trenches dug for cables (and pipelines where relevant). Unmitigated trench construction: backfill and gravel packing around cables/pipes or formal land drainage systems in sensitive areas may result in damaging flow paths developing during storms. Where a risk is identified, measures should be installed to prevent development of these preferential flow paths. For example, inclusion of impermeable bunds within trenches and use of backfill material with low permeability will help prevent possible wash-out along these trench lines. The requirement and impact of permanent or temporary land drainage systems during construction must be clearly assessed. Procedures must be included to ensure removal of any temporary works at the end of that phase.

A hydrological features survey will be required, extending to 500m beyond the site boundary. This should include springs, and the locations of private water supplies. The ES should assess the risk to disruption of sub-surface flow in the context of spring flow for private water supply, and suitable mitigation should be proposed. Action plans to supply water to any affected property should be created as part of this mitigation proposal. Spring protection zones should be implemented to lower the risk of disruption, and site infrastructure should be placed away from any water features.

The report should also identify the main water courses and associated catchment or sub-catchment boundaries. One of the key principles for development should be to protect site hydrology, especially through maintenance of existing surface water features and the hydrological regime.

The applicant should provide information describing any change to the existing surface water drainage that any component of the scheme may have. Greenfield run-off rates may need to be determined and suitable flow attenuation facilities (e.g., ponds or swales) installed within the drainage system. This is to ensure there is no increase in flood risk downstream of the development areas. All calculations or assumptions should be included in the report for subsequent verification by the Local Planning Authority Drainage Engineer.

Questions for Consultees

Q12.1: We have assumed that infrastructure to support the transmission (towers etc) will be deemed as water compatible or if not, as essential infrastructure. Please could you confirm that this approach is acceptable?

Please see our detailed comments above.

Q12.2: Given the very localised nature of proposed permanent ground-based infrastructure e.g., towers, we assume that formal drainage arrangements will not be required with incidental water returned to ground adjacent to the structure. Please could you confirm that this approach is acceptable?

Assuming incidental water does the applicant mean surface water? Assuming this is surface water please refer to our advice reiterating the local hydrology being kept the same.

Q12.3 Are you in agreement that the proposed desk and field surveys are sufficient for the purposes of the EIA?

We would include the deep peat layer on Datamap Wales here as you will need to ensure that hydrological flows in and to areas of deep peat are not intercepted.

Section 12.44 and 12.45 - we note the acknowledgement that the construction phase has the potential to alter groundwater flows and aquifer properties from activities such as piling, which in turn may impact upon sensitive receptors such as Public Water Supplies (PWS) and Groundwater Dependent Terrestrial Ecosystems (GWDTEs). The proposal, however, is to scope constructions effects upon hydrogeology out of the ES based on no sensitive receptors being identified. Table 12.1 in Section 12.48 however states that 'Hydrogeology and water abstractions' will be scoped in during construction. Could it be clarified which is true? We would advise these are scoped in on the basis of our comments. We note that effects on hydrogeology and water abstractions is proposed to be scoped in during operation.

Chapter 13 - Ground Conditions, Geology and Hydrogeology

Section 13.11 - advises “*There are no foreseeable significant changes anticipated in relation to Ground Conditions either prior to, or during, the construction and operational phases*”. It is assumed, based on the narrative in the report, that the operational phase is considered to be in the region of 80 years. It is not obvious what ‘significant changes’ the applicant has considered here. Ground Conditions referred to in this report cover a broad range of topics and whilst some such as bedrock Geology are unlikely to change considerably, others such as land contamination and hydrogeology have the potential too. Considering the timescales in play here, we think it would be beneficial for the applicant to outline what they have considered and why they don’t consider it to be significant for the lifecycle of the project’s construction and operation.

Section 13.13 - We advise that the principles of Land Contamination Risk Management ([LCRM](#)) be followed for the assessment and management of any land contamination identified.

Section 13.14 - We advise that DataMapWales ([Home | DataMapWales \(gov.wales\)](#)) is also reviewed for publicly available information for Wales.

Section 13.22 - refers to the Preliminary Risk Assessment (PRA) to be undertaken – we welcome this. Whilst it is acknowledged that hydrogeology has been considered in previous chapters, this has not been looked at in the context of ground conditions (such as contaminated land, dewatering requirements, aquifer designations etc) and we therefore recommend this is included within the PRA at an early stage; hydrogeology is intrinsically linked to some of these. We note the potential for foundations to extend to approximately 5m below ground level; there therefore needs to be a thorough assessment of groundwater levels and whether the installation of these foundations will have an impact upon groundwater. Considerations for dewatering to enable such installation, or cable routes etc, should also be considered.

Section 13.3 - We welcome the inclusion of existing contamination (including but not limited to landfills) to be scoped into the assessment. We expect reviews of records of contaminated land held on public registers and by the LPA to form part of the PRA.

Questions for Consultees

Q13.1: Please confirm what dataset(s)/ policy document(s) are available to ensure that our assessments are as robust as possible (including any site identified, prioritised, or proposed to be investigated under Part II a of the Environmental Protection Act. ?

Other than those identified, we also highlight the following:

- NRW Environmental Impact Assessment [website](#)
- Land Contamination Risk Management ([LCRM](#))
- Development of Land affected by Contamination: A Guide for Developers ([Development of Land Affected By Contamination Guide for Developers 2017.pdf](#))
- CL:AIRE Water and Land Library ([WALL](#))
- Contaminated Land Statutory Guidance ([Contaminated Land Statutory Guidance – 2011 version \(gov.wales\)](#))
- BS10175:2011 Investigation of Potentially Contaminated Sites – Code of Practice

- NRW Peatlands of Wales map on Datamap Wales [Unified Peat Map of Wales | DataMapWales \(gov.wales\)](https://data.gov.uk/dataset/unified-peat-map-of-wales)

Q13.2: Confirmation that the desk and field surveys are sufficient for the purposes of the EIA.

The desk studies and subsequent investigatory field studies should be robust enough to identify any possible pollutant linkages (source - pathway - receptor) which may be relevant, and appropriately characterise them to determine any potential significant risks which may be present to receptors. With regards to hydrogeology as commented on above, sufficient datasets on the groundwater table covering seasonal fluctuations should be collected in order to adequately assess any associated significant impacts.

Where peat depth surveys are conducted, also consider peat core to ensure that the deep peat is actually deep peat and not soft in-wash clays/alluvial clays. Deep peat also needs to be checked for where vegetation communities/Phase 1 habitats indicate its potential presence - this can be derived from the Phase 2 data layers and Phase 1. The Peatlands of Wales Map/unified peat layer is a work in progress and is continually being updated with recent peat depth assessments as they become available.

Q13.3: Do you consider the potential effects to be scoped in and out to be appropriate to inform a proportional assessment?

We welcome the inclusion of the potential for significant effects from contaminated land within scoping. We would also note that, whilst current records of known land with contamination will be identified during the initial stages and PRA / field studies, there is the potential for land along the study route to be investigated and identified as having contamination during the lifecycle of the project.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Lisa Jones

Gynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Ffôn/Phone:



E-bost/E-mail:

swplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi. / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Marloes Holtkamp
Planning Officer
PEDW

Eich cyf/Your ref: **CAS-02379-
G1Z1J0**

Ein cyf/Our ref:

Dyddiad/Date: 16 Nov. 23

Dear Marloes

Potential DNS Application: Green GEN Towy-Usk Project

Thank you for your letter of 24 October consulting us on the above proposed development of national significance (DNS).

Advice

This advice is given in response to scoping opinion as to the contents of an Environmental Impact Assessment (EIA) that will be submitted in support of an application for the Green GEN Towy-Usk Project.

The national policy and Cadw's role in planning are set out in Annex A.

Assessment

The scoping request is accompanied by a scoping report produced by LUC and the historic environment is considered in chapter 9 of that document. At the end of that chapter five questions are asked and our answers are given below.

Q9.1: Do consultees consider the Study Area appropriate?

The proposed study area for designated historic assets is the scoping corridor plus a 3km study area from its boundary. We agree that this is appropriate and to assist the study we have identified the designated historic assets inside this area (listed in Annex B).

Q9.2: Are there any other relevant consultees who should be consulted about this topic?

The archaeological planning services of the Clwyd-Powys Archaeological Trust and the Dyfed Archaeological Trust should be consulted on the non-designated archaeological assets. The Conservation Officers of the Local Planning Authorities should be consulted on the effect of the proposals on the settings of listed buildings.

Q9.3: Are consultees aware of any other supplementary guidance of relevance to assessment of effects to historic assets?

In addition to the legislation, policy and guidance stated in section 9.21 of the scoping report we would expect that the advice given in the

Powys CC Supplementary Planning Guidance on Archaeology and Historic Environment should be considered.

The application will not be submitted until 2025 as such The Historic Environment (Wales) Act 2023 will have been enacted and will need to be considered in the EIA.

Q9.4: Is the approach to the assessment of effects, including those effects scoped in and out and the cumulative assessment, appropriate?

Yes.

Q9.5: Is the approach to surveys, including geophysical survey, considered appropriate?

The geophysical survey may identify anomalies that will require archaeological evaluation to determine their significance. The evaluation work will need to be carried out prior to the completion of the EIA.

An ASIDOHL2 assessment will be required and Cadw should be consulted on this to determine the historic landscape character areas that will be included in the study.

The setting of the designated heritage assets identified in Annex B, should be carried out in accordance with the Welsh Government guidance given in the document "The Setting of Historic Assets in Wales". We would expect a stage 1 assessment to be carried out for all of these designated heritage assets, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific heritage assets. The results of the stage 1 assessment should be included as an appendix in the EIA.

Yours sincerely,

Jenna Arnold



Historic Environment Branch

Annex A

Our role

Details about our role in the DNS process are available [online](#).

National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Conservation Principles for the Sustainable Management of the Historic Environment in Wales, Technical Advice Notes and related guidance.

PPW ([Chapter 6 – The Historic Environment](#)) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

Annex B

Registered Parks and Gardens:

PGW(Dy)5(CAM)	Aberglasney
PGW(Dy)10(CAM)	Golden Grove
PGW(Dy)11(CAM)	Pantglas
PGW(Dy)12(CAM)	Plas Dinefwr
PGW(Dy)13(CAM)	Taliaris
PGW(Dy)4(CAM)	Middleton Hall
PGW(Dy)49(CAM)	Paxton's Tower
PGW(Dy)71(CAM)	Llwynywormwood
PGW(Po)19(POW)	Pencerrig

Scheduled Monuments

BR031 Builth Castle
BR093 Caer Beris
BR100 Round Barrows N & NE of Ffynnon Dafydd-Bevan
BR101 Tri Chrugiau Round Barrows
BR102 Round Barrows 2400m WNW of Drover's Arms
BR130 Caerau Castle Mound
BR132 Cambrian Factory Standing Stone
BR143 Hirllwyn Camp
BR147 Tower Hill Round Barrow
BR148 Caerau Roman Site
BR206 Banc y Celyn Stone Circle
BR280 Cwmhindda Deserted Rural Settlement
BR281 Hendy Long Hut
BR380 Tynewydd Roman road
BR399 Coed Chwefri Vickers Machine Gun Emplacement
CM005 Dolau-Hirion Bridge
CM010 Llwyn Du Camp
CM012 Waun Pwtlyn Long Barrow
CM015 Llandovery Castle
CM029 Castell Dinefwr
CM030 Castell Dryslwyn
CM037 Garn Goch Camps
CM042 Ffynnon-Newydd Standing Stones
CM082 Grongaer
CM099 Castell Meurig
CM122 Pen Celli Standing Stone
CM123 Clos-Teg Standing Stones
CM124 Banc y Bettws Castle Mound
CM149 Maes y Castell
CM150 Pen y Garn Camp
CM151 Pen y Cnap Castle
CM155 Bryngwyn Standing Stone
CM157 Allt-y-Ferin Mound and Bailey Castle
CM162 Ynys-y-Borde Earthwork
CM170 Fan Camp
CM171 Cwm-Bran Camp



CM180 Standing Stone S of Llwyn-Du Farm
CM184 Standing Stone NNW of Clomendy
CM188 Llandovery Roman Site
CM191 Standing Stone NE of Halfway House
CM195 Llys-Brychan Roman Site
CM203 Mynydd Llangyndeyrn Round Cairns
CM239 Llanwrda Castle Mound
CM240 Castell y Domen, Gwempa
CM251 Castell Waunberllan
CM272 Maesdulais Limekilns
CM273 Odyn Jac Limekilns
CM278 Garnbwl Limekiln
CM286 Burnt Mound 450m ENE of Caeglas Farm
CM325 Ffairfach standing stone
CM328 Maes y Crug round barrow
CM366 Dolauhirion, section of Roman road N of
CM367 Dinefwr Park Roman Forts
CM369 Roman Road c. 250m SSW of Gilwen Farm
CM370 Roman Road c. 150m NW of Tal-y-Pal
CM373 Abererbwll Roman fort
CM379 Cefn Pal Defended Enclosure
CM385 Cwmdu Defended Enclosure
CM389 Roman Fortlet 300m SW of Gallt yr Adar Fawr
RD003 Crug Eryr Mound and Bailey Castle
RD014 Caer Einon Camp
RD027 The Fedw Stone Circle 360m W of Llanboidy Wood
RD028 Gelli Hill Stone Circle
RD034 Gelli Hill Round Barrow
RD035 Colwyn Castle
RD036 The Mount Mound & Bailey Castle, Hundred House
RD069 Bryn y Maen Alignment (Four Stones)
RD074 Aberedw Hill Round Barrows
RD075 Fforest Wood Mound & Bailey Castle
RD076 Penarth Mount Castle Mound
RD108 Cae-Banal Castle Mound
RD109 Bryn y Maen Round Barrow
RD112 Graig Camp
RD113 Cwm-Maerdy Standing Stone
RD121 Castell Cae-Maerdy Castle Mound
RD122 Carneddau Round Cairn
RD123 Cwm Berwyn Camp
RD137 Roman Fortlet (revealed by aerial photography), Disserth
RD140 Cwrt Llechryd moated site
RD147 Nant Brook Enclosure
RD149 Castle Bank Hillfort
RD157 Medieval Settlement on Penybont Common
RD158 Pant y Rhiw Medieval Settlement
RD164 Caer Fawr Medieval Settlement
RD165 Cwm-Twrch Medieval Settlement
RD166 Aberedw Hill Deserted Rural Settlement
RD169 Cwmblaenerw Enclosed Long Hut
RD170 Cwmblaenerw House Platforms
RD175 Upper House Platform House



RD184 Garnfawr Deserted Rural Settlement
 RD218 Giant's Grave round cairn
 RD219 Carneddau, standing stone to SSW of
 RD220 Carneddau, round cairn on N end of
 RD221 Carneddau, cairn on N end of
 RD222 Cwm-berwyn round cairn
 RD223 Upper House round cairns
 RD224 Court stone row
 RD225 Court standing stone
 RD226 Cilberllan ring cairn
 RD227 Gwernfach round cairn
 RD228 Castle Bank ring cairn
 RD229 Cwm standing stone
 RD230 Hundred House round barrow
 RD234 Llannerch cup-marked rock
 RD235 Carneddau round cairns
 RD236 Bryntwppa stone row
 RD237 The Gaer hillfort
 RD243 Llwyn-y-wrach standing stone
 RD262 Coed-swydd enclosure
 RD264 Llandegley Rocks hillfort

Registered Historic Landscape:

HLW (D) 1 Black Mountain and Mynydd Myddfai
 HLW (D) 5 Tywi Valley

Listed Buildings

3067	Brynmaen Quaker Burial Ground	II
6696	Glan Irfon	II
6697	Cefn Brith	II*
6705	Alltmawr Isaf	II
6706	Barn range at Alltmawr Isaf	II
6709	Cribarth	II
6710	Aberduhonw	II*
6711	Barn and attached ranges at Aberduhonw	II*
6713	Garth House	II
6716	Cefn	II
6717	Dolygaer	II
6718	The Old Vicarage	II
7417	Wye Bridge	II
7418	The Fountain Hotel	II
7419	Lion Hotel	II
7420	NO.4 BROAD STREET,,,,,POWYS,	II
7421	NO.6 BROAD STREET,,,,,POWYS,,7421	II
7422	NO.8 BROAD STREET,,,,,POWYS,,7422	II
7423	NO.10 BROAD STREET,,,,,POWYS,	II
7424	Wyeside Arts Centre	II
7425	Telephone Call-box	II
7426	Pillar Box	II
7427	The White House	II



7428	Horeb Congregational Church	II
7429	Parish church of St Mary	II
7430	The White Horse PH	II
7431	Roy Brown's Coaches	II
7432	Cosy Corner Tea Rooms	II
7433	T.J. Morgan	II
7434	Former Confectioner's Shop	II
7435	Hughes Outfitters	II
7436	Drovers Tea Rooms & Restaurant	II
7437	Bristol House occupied by Davies Bros. Grocers	II
7438	Pen Graig Barn	II
7439	Swan Hotel	II
7440	The Plough Inn P.H.	II
7441	Bank House	II
7442	Llanfair Guest House	II
7443	War Memorial	II
7444	Alpha Presbyterian Church	II
7445	Post Office	II
7446	Barley Mow P.H.	II
7447	Premises now occupied by National Westminster Bank	II
7448	Premises now occupied by J.K.Evans	II
7449	Pillar Box	II
7450	Peterwell	II
7451	Memorial Baptist Chapel	II
7452	Vaynor House	II
7453	Clifton House	II
7454	Oakfield	II
7455	Hafod	II
7456	The Old Hall	II
7457	The Old Hall	II
7458	The Old Hall	II
7470	Pump Room at Park Wells	II
7471	Spring House at Park Wells	II
7475	Former Dol y Coed Pump Room	II
7476	Dol y Coed Well-House	II
7490	Llanwrtyd Wells Station & North Platform	II
7497	Builth Golf Club House	II
7522	Old Pendre	II
7538	Dol y Coed	II
8802	Wye Bridge (partly in Builth Wells)	II
8804	Gwern Hwsmon	II
8805	Church of St David	II*
8808	Cefndyrys	II*
8809	Stable block at Cefndyrys	II
8810	Old house at Gelli Cadwgan Farm	II
8811	The Old Mill	II*
8812	Fforest Farmhouse	II
9236	Milestone on grass verge opposite Corn Hill	II
9250	Milestone in verge to E of Gwernargllwydd	II
9257	Llanevan	II

9258	Barn to N. opposite Llanevan Farmhouse	II
9259	Cowhouse 10m W of Llanevan Farmhouse	II
9262	Milestone in Road Verge about 500m SW of Llanwenny	II
9268	Milestone in wide Grass Verge below The Van Hill	II
9269	Milestone in Grass Verge 300m W of Fforest Inn	II
9298	Little Trewern Farmhouse	II
9299	Outbuilding attached to Little Trewern Farmhouse	II
9300	L Plan Farm Ranges to NW of Little Trewern	II
9303	Rhonllwyn	II
9304	The Pales (Quaker Meeting House)	II*
9305	Church of St Tecla including the Churchyard with Tomb Chests	II
9306	Burton House (formerly the Post Office)	II
9307	Y-friallen	II
9308	Telephone Call-box to NE of the Parish Church	II
9309	Ffaldau	II
9310	Carnau	II
9312	Milestone by roadside on N side of farm road to Llanloggin	II
9313	Larch Grove	II
9314	Little Graig	II
9315	Outbuildings 10m NE of Little Graig	II
9316	Graig	II
9317	Outbuilding range 30m SW of Graig	II
9318	Upper Graig (Old House)	II
9319	Lower Cwm	II
9320	Outbuilding range immediately SE of Lower Cwm	II
9321	Lower Llwynburfach Lower Llwynburfach	II
9322	Barn at Lower Llwynburfach Lower Llwynburfach	II
9323	Nantddu	II
9324	Outbuilding immediately SE of Nantddu farmhouse	II
9325	Vronlase (The Old Farmhouse)	II
9326	Barn range 50m SW of old farmhouse at Vronlase	II
9327	Cowhouses 100yds SW of the Old Farmhouse at Vronlase	II
9328	Wern, including adjoining outbuilding range	II
9363	Llwynburfach Farmhouse	II
9364	Barn at Llwynburfach Farm	II
9384	The Nelson Monument (also known as Paxton's Tower). Church of St David (also known as Church of St Arthneu or St	II*
9390	Arthney).	II*
9391	Pont Llandeilo-yr-ynys (partly in Llanegwad Community)	II*
9393	Church of St Twrog	II
9394	The White Hart	II
9395	Capel Bigawdin	II*
9399	Church of St Cyndeyrn	II*
9417	Rhydarwen (also known as Rhyd-owen).	II*
9717	Stable Block of Middleton Hall	II
9733	Pibwr Lwyd Farmhouse	II*
9735	Old Smithy	II
10907	Henllys	II*
10911	Plas Taliaris	I
10912	Cockpit to W of Plas Taliaris	II

Pont Llandeilo-yr-ynys

10921	(partly in Llanarthney Community)	II*
10922	Cynghordy Viaduct	II*
10923	Cynghordy Hall	II
10925	Cefncoed	II
10926	Golden Grove Mansion	II*
10929	Church of St Cathen	II*
10932	Llethr Cadfan Farmhouse including former 'granary' building	II*
10934	Dryslwyn Castle	I
10935	Cwrt-y-plas	II
10936	Church of Saint Cadoc	II*
10937	Church House	II*
10938	Nythfa	II
10939	Great House (Post Office)	II
10940	Red Lion Hotel	II*
10941	The Limes (including front railings)	II
10942	The Vicarage	II
10943	Plas Glansevin	II*
10944	Mandinam	II
10945	Church of Saint Sadwrn	II
10946	Cwm-eilath Farmhouse	II
10947	Bont-ar-Towy (partly in Llangadog Community)	II*
10956	Neuadd Fawr	II*
10957	Church of St Michael	I
10958	Cilgwyn Manor	II
10964	Pont Dolauhirion (partly in Cilycwm community)	I
10965	Llandovery Castle	II*
10966	Llandovery College	II
10967	Church of St Mary Monument & memorial of William Williams in churchyard of St	I
10969	Mary's Church	II
10970	The Old Printing House	II
10971	Emlyn House	II
10972	Bank House	II
10973	Mile End House	II
10974	The Black Ox	II
10975	Violet Cottage and front railings	II
10976	Clarence House	II
10977	Frankville	II
10978	Bellevue	II
10979	White Hall Hotel	II
10980	NO.5 HIGH STREET,,,,,DYFED,	II
10981	Plasdderwen	II
10982	Royston Hotel	II
10983	Jubilee Stores	II
10984	Ty-Ficar Pritchard	II*
10985	Albert House and No 10A, including walls, railings and gates	II
10986	NO.12 HIGH STREET,,,,,DYFED,,10986	II
10987	Prospect House (Lloyds Bank)	II

10988	Britannia House	II
10989	Castle Hotel	II
10990	Llandingat House	II
10991	Church of St Dingat	II*
	Railings to grave enclosure against N wall of churchyard of	
10992	Church of St Dingat	II
10993	Sir Gardner Wilkinson tomb in churchyard of Church of St Dingat.	II
10994	Lychgate and N gate to churchyard of Church of St Dingat	II
10995	The King's Head	II
10996	The Post Office	II
10997	National Westminster Bank	II
10998	NO.9 MARKET SQUARE,,,,,DYFED,	II
	NO.11 MARKET SQUARE (BROADWAY RESTAURANT -	
10999	PREVIOUSLY LISTED AS MASOCHI'S CAFE),,,,,DYFED,	II
11000	Broadway House	II
11001	Forest House (Barclays Bank)	II
11002	Church House	II
11003	The Town Hall	II
11004	Old Market Hall	II
11005	The Red Lion	II*
11006	NO.4 MARKET SQUARE,,,,,DYFED,	II
11007	NO.6 MARKET SQUARE,,,,,DYFED,	II
11008	NO.18 MARKET SQUARE,,,,,DYFED,	II
11009	The Bear Inn	II
11010	Brodawel	II
11011	Ael-y-bryn	II
11012	Clydfan	II
11014	NO.4 QUEEN STREET,,,,,DYFED,,11014	II
11015	Salem Independent Chapel	II
11016	Railings and gates to Salem Chapel	II
11017	Ebenezer Baptist Chapel	II
11018	Tabernacle Chapel	II*
11019	NO.1 STONE STREET,,,,,DYFED,	II
11020	NO.3 STONE STREET,,,,,DYFED,	II
11021	NOS.9 & 11 STONE STREET,,,,,DYFED,	II
11022	The New White Lion Inn	II
11023	Darwen House	II
11024	NO.26 STONE STREET,,,,,DYFED,	II
11026	NO.30 STONE STREET,,,,,DYFED,	II
11027	Ty Cerrig	II
11028	Windermere House	II
11029	NO.4 ABBEY TERRACE,,,,,DYFED,	II
11030	NO.5 ABBEY TERRACE,,,,,DYFED,	II
11031	Stretch of Walling & Archways between Nos.5 & 7	II
11032	Bank Buildings	II
11033	NO.14 BANK BUILDINGS,,,,,DYFED,	II
11034	Bank House	II
11035	NO.3 BANK TERRACE,,,,,DYFED,	II
11036	NO.4 BANK TERRACE,,,,,DYFED,	II
11037	Six Bells	II

11038	Myrtle Hill	II
11039	The King's Head	II
11040	Llandeilo Bridge (including Causeway)	II*
11041	Waterloo Villa	II
11042	NO.24 BRIDGE STREET,,,,,DYFED,	II
11043	NO.25 BRIDGE STREET,,,,,DYFED,	II
11044	Hill House	II
11045	Former School House	II
11046	Former National School	II
11047	Gates & Gatepiers to Penlan Park	II
11048	Bandstand in Penlan Park	II
11049	Former Provision Market (Premises of Brockington & Scott LTD)	II
11050	Briskin House	II
11051	Cambrian House	II
11052	Well (including churchyard Wall for 10m West and 20m East)	II
11053	NO.4 CHURCH STREET,,,,,DYFED,	II
11054	Stepney House	II
11055	Mount Pleasant	II
11056	NO.1 GEORGE HILL,,,,,DYFED,	II
11057	NO.5 GEORGE HILL,,,,,DYFED,	II
11058	6 George Hill	II
11059	NO.7 GEORGE HILL,,,,,DYFED,	II
11060	NO.8 GEORGE HILL,,,,,DYFED,	II
11061	NO.9 GEORGE HILL,,,,,DYFED,	II
11062	NO.1 GEORGE STREET,,,,,DYFED,	II
11063	NO.2 KING STREET,,,,,DYFED, Premises of Llewellyn Humphrey's, Chartered Surveyor & Estate	II
11064	Agents	II
11065	Cafe Royale	II
11066	NO.4 KING STREET,,,,,DYFED,	II
11067	Peppercorn	II
11068	Veterinary Surgery	II
11069	Towy Home Decor	II
11070	Prospect House	II
11071	Green Hall	II
11072	The Salutation Inn	II
11073	Salem Welsh Calvinistic Methodist Chapel	II
11074	NO.3 RAILWAY TERRACE,,,,,DYFED,	II
11075	NO.4 RAILWAY TERRACE,,,,,DYFED,	II
11076	Milestone	II
11077	Milestone	II
11078	Midland Bank	II
11079	Midland Bank Chambers	II
11080	The Cawdor Arms Hotel John Francis Chartered Auctioneers, Walter James & Son Estate	II
11081	and Insurance Agency	II
11082	House to rear of 72	II
11083	NO.70 RHOSMAEN STREET,,,,,DYFED,	II
11084	Outhouse opposite No.70	II
11085	(Former Horeb) Wesleyan Chapel	II

11086	Sniffers	II
11087	NO.66 RHOSMAEN STREET,,,,,DYFED,	II
11088	Angel Hotel	II
11089	Dewi Price & Co Solicitors	II
11090	National Westminster Bank	II
11091	The Castle Hotel	II
11092	NO.115 Including tunnel passage & rear range to right	II
11093	Former Reading room & Library	II
11094	Dyfed County Council Social Services Department	II
11095	Goldsmith, Jewellers, Silversmiths	II
11096	The Tuck Shop	II
11097	Parsih Church of St Teilo	II
11098	Plas Dinefwr, including SW Screen wall	II*
11099	Summer House at Plas Dinefwr	II*
11100	Low Stone Walls & Gates to Ha-Ha surrounding Plas Dinefwr	II
11101	Fountain in Centre of terraced garden on W side of Plas Dinefwr	II
11102	Inner Courtyard Ranges at Dynevor Castel (Newton House)	II*
11103	Outer Courtyard Ranges at Dynevor Castle (Newton House)	II*
11104	Dairy Cottage at Dynevor Castle (Newton House)	II
	Dovecote to S of courtyard ranges at Dynevor Castle (Newton House)	II
11105	House)	II
11106	Deer Abbatoir in Park to S of Dynevor Castle (Newton House)	II
11107	Ice House to the N.of Dynevor Castle (Newton House)	II
11108	St Tyfi's Church (now Interpretation Centre)	II
11109	Dynevor Home Farmhouse (formerly Newton Farmhouse)	II
11110	Corn Barn to N of Dynevor Home Farmhouse	II
11111	Byre Range (Formely Stabels) to NE of Dynevor Home Farmhouse	II
11112	Red Cottages, Dynevor Park	II
11113	Red Cottages, Dynevor Park	II
11114	Llandeilo Railway Bridge (partly in Dyffren Cennen community)	II
11115	Llwynhelig House	II
11116	Stable Block at Llwynhelig House	II
11117	Old Dynevor Castle	I
11128	Former stable and coach block at Pantglas	II
	Former entrance tower to Pantglas, including attached remains of house.	II
11144	house.	II
11145	Ornamental bridge in grounds of Pantglas	II
11149	Telephone Call-box (01550 720559)	II
11153	Aberglasney	II*
11154	Arcaded terrace walks enclosing walled garden at Aberglasney	II*
11155	Gardener's Cottage Café at Aberglasney	II
11156	Gatehouse at Aberglasney	II*
11157	Lodge to Aberglasney, including stone archways into courtyard	II
	NE courtyard range at Aberglasney, incorporating stables and cart shed	II
11158	shed	II
11159	East Bailiffs Lodge at Aberglasney	II
	SE courtyard range, incorporating bakehouse and cow house at Aberglasney	II
11160	Aberglasney	II
11161	The Coach House and The Barn at Aberglasney	II
11173	The Old Bank	II

11176	Court Henry	II*
11177	NO.21 BRIDGE STREET,,,,,DYFED,	II
11178	Lewis Memorial Fountain	II
11179	Erryd	II*
11180	Aberdeunant	II*
11181	Glandulais Farmhouse	II
14548	Talhardd	II
15178	Tower House	II
15179	Milestone on A40, to SW of Derwen Fach	II
15181	Capel Isaf	II
15182	Attached Stable Range to W of Capel Isaf	II
15183	Brynio Fawr	II
15185	Salem Independent Chapel	II
15186	Hafod	II
15187	Attached Byre to left of Hafod	II
15188	Outbuilding to SW of Hafod	II
15189	Church of the Holy Trinity	II
15190	War Memorial, steps and walls	II
15191	Garlands	II
15192	Maerdy Farmhouse	II
15193	Taliaris Lodge	II
15629	Clearbrook Lodge and Meadow Cottage (at Clearbrook)	II
16986	Pont Newydd	II*
16988	Abergwenlais House	II
16989	Abergwenlais Mill	II
16990	Abergwenlais outbuildings	II
16991	Cefn Trenfa	II
16992	Barn to N of of Cefn Trenfa	II
16993	Outbuildings to N of Cefn Trenfa	II
16996	Dolauhirion Bridge (partly in Llandovery community)	I
17000	The Coach house at Henllys	II*
17001	Baliff's House at Henllys	II
17002	Barn of NE corner of yard at Henllys	II
17003	Stable and carthouse range at NW angle of farm yard at Henllys	II
17004	Cowshed to W of farmyard at Henllys	II
18865	Llandeilo-yr-Ynys Farmhouse	II
	Capel Bethel including attached vestries to rear and forecourt wall	
19377	and railings	II
	Llandeilo Bridge (including causeways) (partly in Llandeilo	
20900	community)	II*
20902	Cawdor Farmhouse	II
20903	Tregib Arms	II
20904	Capel Bethel	II
20905	Capel Tabernacl	II
20906	Penycoed	II
20907	Outbuildings to rear of Penycoed	II
20908	East Lodge	II
20909	Milestone on B4300	II
20915	Llyshendy	II
20916	Barn at Pentre Parr	II



20921	Courtyard of farm buildings at Manorafon	II
20922	Centre building of farm-court at Manorafon	II
21216	Llandeilo Railway Bridge (partly in Llandeilo community)	II
21302	Bont Newydd	II
21393	Nantddu	II
21394	Barn at Nantddu	II
21396	Capel Gosen	II
21397	Glanbran Arms Inn including former barn range to left.	II
21398	Milestone 170m W of Gerddigwynin	II
21399	Pantyrhedyn	II
21421	Tawelfan	II
21456	Upland	II
21457	Former stables at Upland	II
21461	Church of St Egwad	II
21738	Lychgate of St David's Church	II
21739	Capel-y-dolau C. M. Chapel (also known as Capel-y-ddôl).	II
21740	Former Llanarthney National School	II
21741	Former Llanarthney Railway Station with single Platform	II
21742	Milestone opposite to Llanarthney Church	II
21743	Capel Dewi C. M. Chapel	II
21744	Former Capel Dewi School	II
21745	Capel Dewi Uchaf Farmhouse	II
21746	Dryslwyn-fawr Farmhouse	II
21747	Dryslwyn-fawr Barn Range	II
21748	Dryslwyn-fawr Cartshed and Stables	II
21749	Dryslwyn-fawr Cowshed	II
21750	Dryslwyn-fawr Former Stables Range	II
21751	Dryslwyn-fawr Pigsties	II
21752	Milestone near Ffinnant	II
21753	Service Yard and Gateway of Middleton Hall	II
21754	Ice House of Middleton Hall	II
21755	Dôlgwynon (also known as Gwynon Dale).	II
21756	Brynhawddgar	II
21757	Tower Lodge	II
21758	Pont Felin-gât	II
21759	Bridge above Waterfall in Middleton Park	II
21760	Weir in Middleton Park	II
21761	Capel Elim Parc (Baptist Chapel) with Baptismal Pool	II
21762	Pistyll Dewi Farmhouse	II
21763	Milestone near Pont Llandeilo-yr-ynys	II
21764	Milestone near Ty-newydd	II
21765	Milestone near Wernbongam	II
21766	Rear stable block of Middleton Hall	II
21970	Milestone outside Llangadog Creamery	II
21971	Milestone near Bran Mill	II
21972	Crug Glas	II
21973	Outbuilding at Crug Glas	II
21974	Granary at Crug Glas	II
21975	Pound near Rhud y Mon	II
21979	Delfan	II



21980	Rose Cottage	II
21981	Llwyn-yr-adar	II
21985	Toll House at Glansawdde	II
21986	Glansawdde	II
21987	Plas Newydd and barn	II
21988	Capel Gosen	II
21991	The Limes Shop	II
21992	Coedweddus	II*
21993	Outbuildings to rear of Red Lion Providence Independent Chapel, vestry, house and railed forecourt.	II
21994	Bont-ar-Towy (partly in Llansadwrn community)	II*
21996	Penrhyn House	II
21997	Brodawel	II
21998	Former Church Hall	II
21999	Pont Bran	II
22004	Railings, piers and gates to former Church Hall	II
22015	Church of Saint Cwrda	II
22016	Pound by churchyard of Church of St Cwrda	II
22017	Cornwallis Flats	II
22018	Milestone by The Vicarage	II
22019	The War Memorial	II
22021	Boundary Stone at Glandulais	II
22022	Cwm-dwr	II
22023	Borezell	II
22024	Pwllagddu	II
22025	Barn at Pwllagddu	II
22026	Lychgate to Church of St Cwrda	II
22027	Barley Mount	II
22028	Barn range at Barley Mount	II
22029	Cowshed at Barley Mount	II
22030	The Old Mill	II
22031	Plas Newydd including front railings and gate.	II
22109	Former stables to Danyralt	II
22110	The War Memorial	II
22111	The Pound	II
22112	Capel Ebenezer	II
22113	The Old Vicarage	II
22114	Fountain House	II
22115	Myrtle Hill	II
22116	Seion	II
22117	Former tannery at Aberdeunant	II
22118	Outbuilding to W of farmhouse at Aberdeunant.	II
22119	Barn range at Aberdeunant	II
22120	Outbuilding SW of house at Aberdeunant	II
22121	Open-bay shed at Aberdeunant	II
22122	Capel Libanus (Baptist Chapel)	II*
22123	Outbuilding at Glandulais	II
22124	Glanyrhod	II
22125	Bancygwin	II

22126	Green Meadow	II
22127	Pengwar-neuadd	II
22128	Barn N of Pengwar-neuadd	II
22129	Barn at Green Meadow	II
22130	Cottage to SW of tannery at Aberdeunant	II
22131	Lofted stable at Green Meadow	II
22132	Cow-house at Green Meadow	II
22133	Cwm Llynfe Uchaf	II
22171	Golden Grove Inner East Gate	II
22172	Eagle Lodge	II
22173	North Lodge	II
22174	Garden Wall of the Former Mansion	II
22177	April Cottage, formerly the Almshouses	II
22178	Pont-y-wern	II
22179	Church of St Michael	II*
22180	Lychgate of St Michael's Church	II
22181	Awelaur, formerly the Vicarage	II
22182	Church Hall, formerly the Church School	II
22185	Horse Trough and Fountain	II
22186	Telephone Call-box (01558 668461)	II
22197	Cilsan Bridge	II
22202	Awelaur (former Vicarage) Coach-house	II
22203	Awelaur (former Vicarage) Servants' Latrine	II
22204	Golden Grove Stable Block	II*
22205	Golden Grove Terrace	II
22206	Golden Grove Garden Seat and Stairs	II
22269	Capel Salem including forecourt railings	II*
22270	Bethel Baptist Chapel and attached vestry.	II
22271	Pen-y-graig Independent Chapel	II
22385	Churchyard wall, gates and war memorial at Church of St Michael	II
22386	Llety Ifan Ddu	II
22387	Field bridge to N of Cilgwyn	II
22388	Milestone near Coedglassallt	II
22389	Milestone near Derwenfawr	II
22390	Milestone near Green Grove	II
22391	Ty'n y coed	II
22392	Capel Seion	II
22393	Ty'r Graig	II
22394	Bailey Glas	II
22395	Ger y Lan	II
22396	Church House	II
22397	Old Post Office	II
22398	The Plough Inn	II
22399	Llangoedmor House	II
22400	Caegwyn	II
22401	Barn at Llwynywormwood	II
22402	L-plan range of outbuildings at Caegwyn	II
22403	Stable at Caegwyn	II
22708	Pont-ar-Gothi	II
22801	Williams Pantycelyn Memorial Chapel	II*



23025	Cregina Free Mission with gates and railings	II
23028	Hope Chapel, attached house and vestry	II
23522	Church of St David	II
23660	Old Rectory, including forecourt walls, gate, and railings	II
24352	L-plan barn ranges at Maesllech	II
24353	Olewydd Congregational Chapel	II
24354	Llwyn-cus	II
24355	Cow house and barn at Llwyn-cus	II
24358	Railway viaduct SW of Aberdulas Farm (partly in Llangammarch Community)	II
24359	Railway viaduct N of Llwyn Einon (partly in Llangammarch Community)	II
24360	Milestone W of Olewydd Chapel	II
24361	Milestone W of Garth Bridge	II
24480	Milestone NW of Caepandy Farm	II
24481	Milestone E of Cilmeri village	II
24482	Milestone S of Cilmeri Farm	II
24483	Milestone E of Llanfechan Farm	II
24484	Memorial to Llywelyn ap Gruffudd, Prince of Wales	II
24485	Caerberis Manor Hotel	II
24486	Caerberis Lodge	II
24487	Llwyngwyn	II
24512	Penlan and attached byre	II
24513	Barn at Penlan	II
24523	Pont Rhyd y Fferau	II
24526	Llanwrtyd War Memorial Institute	II
24527	Neuadd Arms Hotel	II
24528	Railway Bridge over River Irfon	II
24529	Esgair Dafydd	II
24815	Outbuilding to rear of house at Aberduhonw	II
24816	Barn to rear of farm court at Aberduhonw	II
24817	Outbuilding on W side of farmyard at Aberduhonw	II
24818	Milestone at Henallt	II
24819	Milestone near Glanwye Lodge	II
24821	Sign Post at The Rocks	II
24822	Church of St David or St Llyr	II
24823	Abercynithon	II
25162	Church of the Holy Trinity	II*
25464	Ty Isaf	II
25655	Malthouse at Alltmawr Isaf	II
80842	Aviaries at Aberglasney	II
80843	Barn at Lan Lash	II
80844	Church of St Mary	II
80845	Court Henry Lodge	II
80846	Cow house and dairy at Lan Lash	II
80847	Gates and gate piers at entrance to Court Henry	II
80848	Glandulas Lodge	II
80849	Hafodneddyn	II
80850	Lan Lash, including attached former cow sheds	II
80851	Multi-purpose agricultural range at Llethr Cadfan Farm	II

80852	Neuadd Llangathen	II
80853	Old house, with attached former cow house, at Llwynceilyn Farm	II
80854	Pont Cilsan (partly in Llanfihangel Aberbythych)	II
80855	Pont Court Henry	II
80856	War Memorial in Llangathen Churchyard	II
80857	West Bailiff's Lodge at Aberglasney	II
81013	Cresselly Arms	II
81014	Mounting block at N entrance to Llanegwad churchyard	II
81015	Plas Alltyferin	II
81016	Red Lion	II
81017	Stable, coach house & granary at Plas Alltyferin	II
81018	Stables and coach house at Tawelfan	II
81019	Tawelfan	II
81020	Ty Llandre	II
81021	Ynyswen	II
81026	Penylan House	II
81756	Gutto Mill	II
	Churchyard walls, including lychgate and fold, at Llanddarog	
82274	church	II
82275	Former cart house and stable at Llethr Llestri	II
82276	Former cow house at Llethr Llestri	II
82277	Llethr Llestri	II
82278	Maesdulais Lime Kilns	II
82279	Old house and attached farm building at Llethr Llestri	II
82280	Old House at Garn Farm	II
82281	Old house, with attached cow house, at Garn Farm	II
82282	Bragdy	II
82283	Capel Ifan	II
82284	Cross base and sundial in Llangyndeyrn churchyard	II
82287	Pont Antwn	II
82386	Bridge W of A484	II
82387	Brigwallt y Coed	II
82389	Cow house at Brigwallt y Coed	II
82393	Multi-purpose farm building at Brigwallt y Coed	II
82394	Penddaulwyn Fawr, including attached farm building	II
82397	Bridge on W side of A484 S of Pibwr Lwyd	II
82398	Church of St Maelog	II
82399	Glanrhyd	II
82400	Pont Rhydyronnen	II
82857	,11, Castle Street, Llandovery,,, SA20 0AN	II
82858	,11, Stone Street, Llandovery,,, SA20 0BX	II
82859	,13, High Street, Llandovery,,, SA20 0Pu	II
82860	,15, High Street, Llandovery,,, SA20 0PU	II
82861	,2, Castle Street, Llandovery,,, SA20 0AN	II
82862	,21, High Street, Llandovery,,, SA20 0PU	II
82863	,28, Stone Street, Llandovery,,, SA20 0JP	II
82864	,29, High Street, Llandovery,,, SA20 0PU	II
82865	,38, High Street, Llandovery,,, SA20 0DD	II
82866	,4, High Street, Llandovery,,, SA20 0PT	II
82867	,6, Castle Street, Llandovery,,, SA20 0AN	II

82868	,60,Stone Street,Llandover,,,SA20 0JW	II
82869	,7,High Street,Llandover,,,SA20 0PU	II
82870	Belmont including front walls, railings and gate	II
82871	Bradford House	II
82872	Chapel at Llandover College	II
82873	Commerce House	II
82874	Court House	II
82875	Croft House	II
82876	Cwm Rhuddan	II
82877	Entrance gates and railings to Ebenezer Baptist Chapel	II
82878	Entrance gates with vestry to Tabernacle Chapel	II
82879	Gatepiers and railings to No 1 Velindre	II
82880	Gates and railings to Prospect House (Lloyds Bank)	II
82881	Gloucester House	II
82882	Gollen House	II
82883	Gosen House	II
82884	Granta	II
82885	Croesffordd	II
82886	HSBC Bank	II
82887	Llandingat	II
82888	Llandover Station	II
82889	Llethr	II
82890	Llwyncelyn	II
82891	Lychgate to Church of St Mary	II
82892	Milestone S of Blaenos	II
82893	1 Velindre	II
82894	2 Velindre	II
82895	3 Velindre	II
82896	Oak House	II
82897	Pont Felindre	II
82898	Portland House	II
82899	Railings and wall to garden opposite No 9 (Mile End House)	II
82900	Rhoslyn House	II
82901	Tancoed	II
82902	Telephone Call-box by W wall of King's Arms inn	II
82903	Terrace walls and balustrades at Cwm Rhuddan	II
82904	The Blue Bell	II
82905	The Copse	II
82906	The King's Arms	II
82907	The Mail Coach Memorial	II
82908	The Plough Hotel	II
82909	Trafalgar House	II
82910	Upton House	II
82911	War Memorial and chain-link surround	II
82912	Waterloo Bridge	II
82913	Waterloo House	II
	Gosen Chapel including forecourt railings and gates, and attached	
83050	Ty Capel	II
83485	Barn and stable at Carneddau	II
83487	Carneddau, including attached cow house	II



83489	Road bridge E of Crossway	II
83490	Tynycoed, including attached farm range	II
83491	Upper Llaneon, including attached former cow house	II
83708	Barn at Neuadd Fach	II
83709	Bwlch y Trawspen	II
83710	Cefndyrys Farmhouse, including attached farm ranges	II
83711	Cefndyrys Lodge	II
83712	Church of St Matthew	II
83713	Gate piers and attached walls at entrance to Cefndyrys	II
83714	Maesbryncoch	II
83715	Milestone on A470	II
83716	Milestone on A470	II
83717	Milestone on A481	II
83718	Milestone on A483	II
83719	Milestone on A483	II
83720	Milestone on A483	II
83721	Multi-purpose farm ranges at Cefndyrys Farm	II
83722	Neuadd Fach, including attached farm building	II
83723	Pencerrig Gardens Hotel	II
83724	Pencerrig Lodge	II
83725	Walls, revetment and steps to terrace on S side of Cefndyrys	II
84374	Church of Saint Cadmarch	II*
84375	Llandulas	II
84376	Gwarafog House	II
84377	Old Post Office	II
84378	Parc Farm	II
87491	Telephone Call-box outside the Goose and Cuckoo Public House	II
87606	Former Pumphouse at Victoria Wells	II
87836	Rhydygwydd	II
87897	Finger Post on junction of Capel Dewi Road and Porthyrhyd Road	II



Ref: DNS CAS-02379-G1Z1J0

Marloes Holtkamp
Planning Officer
Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Via Email: PEDW.Infrastructure@gov.wales

6th December 2023.

Dear Marloes Holtkamp,

Re: Scoping Direction Consultation Response – DNS CAS-02379-G1Z1J0 – Green GEN Towy-Usk Project.

In reference to the recent e-mail from PEDW consulting the Department on the above Scoping Direction request, the Department offers the following response for your consideration regarding agricultural land quality, the use of soil and peat resources.

For the Department, the key issues likely to be significantly affected by the development are:

- Best and Most Versatile (BMV) agricultural land
- Maintaining soil services and functions
- The protection of peat resource

1. Background

The Department has previously had initial engagement with the applicant in June 2023 on the initial corridor options regarding Best and Most Versatile (BMV) agricultural land.

2. Agricultural Land Classification (ALC) – Information Sources (Section 14.5).

It is welcome that the ALC Predictive Map Version 2 (2019)¹ information has been used and considered in the assessment of the proposed route and scoping corridor for the project (see Figure 14.1 of Scoping Report Appendix D). The Department wishes to confirm and clarify that the maps should be used together with the published Guidance Note².

The Department has also published information of validated ALC field surveys³. There may be surveys undertaken that would be applicable to the proposed development. Copies of survey reports, where held, are available on request from LQAS@gov.wales.

It is appreciated that as the iterative design process continues, the Scoping Corridor will be refined and any potential interaction with Best and Most Versatile (BMV) agricultural land will be identified. As noted in Section 14.16 and 14.17 (as per published departmental guidance), in areas of predicted BMV, ALC surveys will be undertaken to confirm the grades present and their distribution. This is welcome and the department would be available to provide advice on survey requirements and to validate ALC survey reports on request. This service allows the Determining Authority to have confidence in the information being presented. Should any party refuse or neglect to commission a survey, or the survey is not accepted by the Department, the Predictive ALC Map Grade should be accepted as the best available information.

3. Best and Most Versatile (BMV) agricultural land policy.

If the refined proposals do impact on BMV agricultural land, the Department expects the applicant to provide clear evidence of how PPW paragraph 3.58 and 3.59 has been addressed in:

- i. how '*considerable weight*' is given to protecting BMV land from development.
- ii. demonstrating an '*overriding need*' if BMV land needs to be developed, and
- iii. clear application of the sequential test approach.

The Department would welcome detailed information on the location, area and ALC grade of BMV land that would be subject to development, both on a temporary and permanent basis.

4. Soil Resources Plan (SRP).

As detailed in Section 14.24, it is welcome that a Soils Resources Plan will be developed by the applicant and based on survey evidence. Mineral, organo-mineral and peat soils are finite and provide crucial ecosystem services to Wales. These services include food, fibre, water and important contributions to climate regulation, biodiversity and protection from natural disasters.

¹ https://datamap.gov.wales/layers/inspire-wg:wg_predictive_alc2? ga=2.9580403.752375145.1683810477-638781194.1671101898

² <https://www.gov.wales/agricultural-land-classification-predictive-map-guidance>

³ <https://datamap.gov.wales/layers/inspire-wg:Post 1988 ALC Wales Surveys>

The SRP should be a clear scheme and programme setting out how all soils and their function will be conserved and reinstated and that can be confidently conditioned against. The SRP should be presented in sufficient detail for the determining authority and statutory consultees to form a judgement as to its feasibility, and should include: -

- Soil stripping programme - volumes and types of soils affected;
- Soil handling techniques and procedure;
- Size, location, construction, management and period of soil storage dumps;
- Proposed restoration/reinstatement programme, including techniques and aftercare programme.

The scheme should address PPW paragraph 6.4.3 (bullet 4) to demonstrate:

- i. the proposals will not compromise the resilience of ecological networks by not giving proper consideration to the soil components which underpin them.
- ii. to demonstrate the proposal protects and enhance biodiversity, protects and enhance water resources, protect soils, enables flood mitigation, and the creation of carbon sinks.

The Department agrees with the relevant guidance regarding soils noted at Section 14.14, but would add the Institute of Quarrying (IoQ) '*Good Practice Guide for Handling Soils in Mineral Workings*⁴' as some of the soils handling principals may be applicable to the proposed development.

5. Peatland

Peat soils are extremely fragile. Peatland habitats cover 3-4% of Wales yet store in the region of 20-25% of all Welsh soil carbon. Development and loss of peatland is contrary the recent update to Chapter 6 of PPW⁵, in respect of the 'Step-wise approach' (irreplaceable habitats including the natural resources which underpin them) and the new peatland paragraph at 6.4.20. The priority now given to peatlands reflects their significance in respect of safeguarding ecosystem resilience and ecological networks and in addressing the Nature and Climate Change Emergencies in Wales.

It is welcomed that proposals aim to avoid peatlands and that information on peatland locations and extent has been considered in the initial scoping corridor assessment process. This via a desk-based assessment of the Unified Peat Map⁶ (UPM) and the Peatlands of Wales Map⁷. It is welcome as the Project design evolves, suitable peat surveys will be undertaken, and the findings used to inform the design of the Project (Section 13.29).

⁴ <https://www.quarrying.org/soils-guidance>

⁵ <https://www.gov.wales/addressing-nature-emergency-through-planning-system-update-chapter-6-planning-policy-wales>

⁶ https://datamap.gov.wales/layers/inspire-wg:wg_unified_peat_2019

⁷ <https://datamap.gov.wales/maps/peatlands-of-wales-maps/>

The Department considers the definition of peatland to be used for assessment is as published in the National Peatland Action Programme (NPAP) as noted below. **This should also include any transitioning shallow peaty soils integral to the hydrological functioning of peat *bodies* (on site or adjoining).** The EIA assessment and application will need to acknowledge that peatlands function as an ecosystem, and arbitrary depth thresholds do not consider shallow peaty soils that are integral to the hydrological functioning of wider peat bodies:

“Peat soils are defined by the Soil Survey of England & Wales as:

- more than 40 cm of (O horizon) material within the upper 80cm, excluding fresh litter (L) and living moss; or*
- more than 30 cm of organic (O horizon) material resting directly on the bedrock (R or Cr) or extremely stony material; and,*
- no overlying non-humose material mineral horizon that has a colour value of 4 or more and extends below 30cm depth.”*

6. Policy Context and Guidance

The Department consider the policies and guidance below are applicable to this development:

- Paragraph 3.58 and 3.59 of Planning Policy Wales⁸ (PPW) 11 – 2021
- DCPO letter and Updated Chapter 6 of PPW – published with immediate effect on 18th October 2023⁹.
- Policy 9 of Future Wales - The National Plan 2040¹⁰ highlights soil carbon, biodiversity hotspots / networks, natural flood management and upland habitats as ‘national natural resources’. These national natural resources exist as a direct result of the presence of peat soils.

Policy 9 also identifies BMV agricultural land as a ‘*national natural resource*’.

- Policy 17 of Future Wales - states ‘*all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment*’.
- Policy 18(11) of Future Wales – sets out the need for acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration.
- Chapter 6 and Annex B of Technical Advice Note (TAN) 6¹¹ – 2010.

⁸ https://www.gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf

⁹ <https://www.gov.wales/addressing-nature-emergency-through-planning-system-update-chapter-6-planning-policy-wales>

¹⁰ <https://www.gov.wales/future-wales-national-plan-2040-0>

¹¹ <https://www.gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>

- Paragraph 6.4.3 (bullet 4) of Planning Policy Wales

The advice expressed does not bind any other part of Welsh Government commenting on the proposal. I trust the above comments are clear and unambiguous. I would welcome further discussion if you consider this helpful.

Yours sincerely

Arwel Williams
Soil, Peatland & Agricultural Land Use Planning
Welsh Government
Department for Climate Change
Landscapes, Nature & Forestry Division
LQAS@gov.wales



Llywodraeth Cymru
Welsh Government

Planning and Environment Decisions Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Eich cyf / Your ref CAS-02379-G1Z1J0

Ein cyf / Our ref 23/SW-6062

28 November 2023

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
ORDER 2012:**

Green GEN Towy-Usk Project, Radnor Forest area to Carmarthen

A 132 kV overhead line connection from the proposed Nant Mithil Energy Park in the Radnor Forest area of Powys to a proposed new substation near Carmarthen.

I refer to your consultation of 24th October 2023 regarding the above application. It is understood the steel lattice tower locations are unknown at this stage, where details will need to be provided to prove access for construction is achievable, that minimises any impact on the safety and free flow of trunk road traffic, should access be proposed from the Welsh trunk road network.

The Welsh Government would request, as a minimum, the following conditions be applied to any future planning applications, required to agree tower locations / construction access:

- 1) No development works shall be undertaken until full details of the highways works associated with any new / modified access onto the trunk road have been submitted to and approved by the Local Planning Authority following consultation with the Welsh Government as Welsh trunk road highway authority. Details of the proposed highway works should be as indicated on the submitted plans including the detailed design, geometric layout, construction methods, drainage and street lighting (as appropriate).

The visibility splays shown on submitted plans of the proposed new access onto the trunk road shall at all times be kept free of planting, tree or shrub growth, or any other obstruction in excess of 1.05m above the adjoining carriageway.

All highways works shall achieve full compliance with the DMRB.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE

Trafnidiaeth
Llywodraeth Cymru
Parc Cathays
Caerdydd

Transport
Welsh Government
Cathays Park
Cardiff

- 2) Prior to the commencement of any construction works, provision shall be made within the curtilage of the site for the parking of all construction vehicles together with a vehicular turning area. This parking and turning area shall be maintained free from obstruction at all times such that all vehicles serving the site may park within the site and both enter and leave in a forward gear

General Notes

- 1) Construction works which impact the operation of the trunk road, in particular the routing of cables across the road, will only be accepted once full method statements and risk assessments (as a minimum) have been agreed with Welsh Government.
- 2) The applicant shall undertake a Road Safety Audit of the scheme (Stages 1 – 4) in accordance with the Design Manual for Roads and Bridges GG 119. The applicant shall agree the required measures with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of works on site.
- 3) The applicant shall enter into an Agreement with the Welsh Ministers under Section 278 of the Highways Act 1980 to enable the Applicant to undertake agreed improvement works on the trunk road. This Agreement will contain details of the improvement works, construction conditions and financial arrangements under which agreed measures can be put in place, including indemnifying the Welsh Ministers against third party claims. Without such an agreement in place, any consent that may be granted cannot be implemented.

For further information on this matter please refer to Welsh Government Procedure & Advice Guidance PAG 109/18: section 38, 184, and 278 Agreements under the Highways Act 1980.

If you have any further queries, please forward to the following Welsh Government Mailbox
Lgc_development_control-south@Gov.Wales

Yours faithfully

Jason Ingram

From: Grace Lewis <[REDACTED]>
Sent: Thursday, November 30, 2023 9:35 AM
To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>
Subject: CAS-02379-G1Z1J0- Green GEN Towy-Usk Project

OFFICIAL



Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

My Ref: P/TP23/230
Your Ref: CAS-02379-G1Z1J0

Date: 30 November 2023

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: CAS-02379-G1Z1J0

PROPOSAL: A 132 kV overhead line connection from the proposed Nant Mithil Energy Park in the Radnor Forest area of Powys to a proposed new substation near Carmarthen.

LOCATION: Green GEN Towy-Usk Project

Dear Sir/Madam,

Thank you for your email dated **24 October 2023** together with the opportunity to comment on this proposal.

At this stage NR have no objections in principle to the scheme and reserve detailed comments for when the full application is presented to NR.

The EIA Scoping should consider Transport and Access and the use of any level crossings associated with the development. A transport assessment should be submitted alongside the application and should reference and assess any level crossings construction traffic may use. The assessment should also make suggestions for appropriate mitigation to address any adverse impacts caused by the works.

The proposed development should also consider the following NR standards for drainage. Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which

could adversely affect the stability of Network Rail's property/infrastructure. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels – if altered, to be such that water flows away from the railway. Drainage does not show up on Buried service checks. Detailed drainage plans should be submitted as part of the application for NR's review.

Yours Sincerely,

Grace Lewis

Town Planning Technician Wales and Western
Network Rail
Temple Point, Redcliffe Way, Bristol, BS1 6NL

E [REDACTED]

www.networkrail.co.uk/property

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, Waterloo General Office, London, SE1 8SW.

From: AP Planning HD <APPlanning@hdcymru.co.uk>

Sent: Wednesday, November 8, 2023 2:39 PM

To: Holtkamp, Marloes (COOG - Planning & Environment Decisions Wales)

Subject: FW: DNS CAS-02379-G1Z1J0 - Ymgynghoriad Cwmpasu AEA | EIA Scoping Consultation HD
Ref P-231025-41874

ST Classification: UNMARKED

Good Afternoon

With reference to the above planning application the Company's observations regarding sewerage are as follows.

The above site is out of Hafren Dyfrdwy's waste water area, and therefore we have no comment to make.

Should you require any further information please contact us on email below.

IMPORTANT NOTE: This response only relates to the public waste water network and does not include representation from other areas of Severn Trent Water/Hafren Dyfrdwy, such as the provision of water supply or the protection of drinking water quality.

Kind regards,

Asset Protection Team

Asset Protection

Asset Strategy and Planning

Chief Engineer

Hafren Dyfrdwy

Email: APPlanning@hdcymru.co.uk

From: Shirley Rance [REDACTED] **On Behalf Of** NSIP Applications

Sent: Tuesday, October 31, 2023 10:51 AM

To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>

Cc: NSIP Applications <NSIP.Applications@hse.gov.uk>; HazSubConsent CEMHD5 <HazSubCon.CEMHD5@hse.gov.uk>

Subject: DNS CAS-02379-G1Z1J0 - Ymgynghoriad Cwmpasu AEA | EIA Scoping Consultation - Green GEN Towy-Usk - HSE Response

Dear Marloes Holtkamp,

Thank you for your email dated 24 October 2023 consulting HSE on the Proposed Green GEN Towy-Usk - Development of National Significance (DNS). Please find HSE's advice below.

HSE's land use planning advice

CEMHD5 Contribution to Consultation

1. With reference to the plan **Figure 4.1: Study Area** found in PDF **[Routeing and Consultation Document - Figures 1 <https://www.greengentowyusk.com>]**, on which is shown a blue dotted **Study Area**, given the extensive area there are sections of the proposed development that fall within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s) and Major Accident Hazard Installation(s).
2. As a general principle, HSE will not advise against a proposed development, providing the proposed development does not introduce populations, either permanent or temporary, into any of HSE's public safety consultation zones which are assigned to individual Major Accident Hazard Pipeline(s) and/or Major Accident Hazard Installation(s).
3. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, then the HSE reserves the right to revise its advice.
4. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed development, again the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

5. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required,

and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015.

6. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.
7. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

CEMHD 7'S response is no comment to make as there are no HSE licenced explosive sites in the vicinity of the proposed corridor route.

Kind Regards

Shirley

NSIP Consultation Team
Health and Safety Executive



Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru

Mid and West Wales
Fire and Rescue Service

Prif Swyddog Tân | Chief Fire Officer

Roger Thomas BA(Hons), MSc

tancgc.gov.uk
mawwfire.gov.uk

Studio 117
The Creative Quarter
8a Morgan Arcade
Cardiff
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PEDW.Infrastructure@gov.wales

Gofynner am/
Please ask for:
Rhif Est/Extn.
No.

E-bost/E-mail:

Fy Nghyf/My
Ref:

Dyddiad/Date:

Watch Manager A Hall

bregs@mawwfire.gov.uk

645/5028/00348333

24 October 2023

Dear Sir/Madam

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

**DEVELOPMENT PROCEDURE (CONSULTEES) (WALES) (MISCELLANEOUS AMANDMENTS)
ORDER 2021 – FIRE AND RESCUE AUTHORITIES**

RE: Green GEN Towy-Usk Project

APPLICATION NUMBER: CAS-02379-G1Z1J0

I acknowledge receipt of the notification to the Mid and West Wales Fire and Rescue Authority in relation to the above application.

The site plan/s of the above proposal has been examined and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development :

- The Fire Authority has no comment to make on access for fire appliances or water supplies.
- The Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation.

The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links: <https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>

<https://www.ukfrs.com/index.php/promos/16847>

Y Pencadlys, Heol Llwyn Pisgwydd, Caerfyrddin, Sir Gâr, SA31 1SP
Headquarters, Lime Grove Avenue, Carmarthen, Carmarthenshire, SA31 1SP

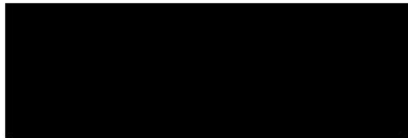
post@tancgc.gov.uk
mail@mawwfire.gov.uk

0370 60 60 699

Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).

The plan/s has been retained for record purposes.

Yours faithfully



Watch Manager A Hall
Authorised Fire Safety Regulator
On behalf of the Mid and West Wales Fire and Rescue Authority

Enc

MID AND WEST WALES FIRE AND RESCUE SERVICE

Advice on Water Supplies

1. WATER SUPPLIES FOR FIREFIGHTING

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to care for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Reference to the National Guidance Document on the Provision of Water for Fire Fighting 2007.

Access to Open Water Supplies

Where development of water-front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

1.1. HOUSING

Minimum main size 100 millimetres. Housing developments of units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.2. TRANSPORTATION

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100 millimetres. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

1.3. INDUSTRY

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any commercial industrial estate is as follows:

Light Industrial/Commercial

Up to one hectare, 20 litres per second - Minimum Main Size 100 millimetres

Up to two hectares, 35 litres per second - Minimum Main Size 150 millimetres

High Risk Industrial

Up to three hectares 50 litres per second - Minimum Main Size 150 millimetres

Over three hectares, 75 litres per second - Minimum Main Size 150 millimetres

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site if they are capable of supplying the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high-risk premises may require a greater flow.

1.4. SHOPPING, OFFICES, RECREATION AND TOURISM

Commercial developments of this type should have a water supply capable of delivering a minimum of 20 to 75 litres per second to the development site. The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and Single Storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

1.6. DISTANCES BETWEEN FIRE HYDRANTS

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates	-	150 metres
Town Centre Areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hostels	-	Adjacent to access
Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Home)	-	Adjacent to access
Old Persons Home	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

1.7. CONCLUSION

Developers should hold joint discussions with the relevant Water Authority or the Environmental Agency and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire.

The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site, as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.

Llanarthne Area Community Pylon Group

20/12/2023

FAO:

Mr Marloes Holtkamp – Planning Officer

Mr Robert Sparey – Planning & Environment Manager

Mr Chris Sweet – Infrastructure Consenting Manager

Planning and Environment Decisions Wales (PEDW)

Dear Sirs,

Re: Green Generation Energy Networks Cymru Limited ('the Private Company')

Reference: CAS-02379-G1Z1J0

We are grateful to PEDW for publishing on the PEDW web-site a copy of the letter 16 October, accompanied by a scoping report, sent to PEDW from LUC on behalf of the Private Company.

The letter 16 October indicates that 'The EIA Regulations make provision for obtaining a Scoping Direction from Welsh Ministers on the information to be included in the ES. This cover letter is the Applicant's formal request for a scoping direction for the Project in accordance with the EIA Regulations and is accompanied by a Scoping Report.'

The letter also states that the scoping report confirms the proposed methodology for the EIA topic areas and includes specific queries for consideration by statutory consultees.

The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, specifically Regulation 14(7), provides for obtaining a scoping direction from the Welsh Ministers as to the information to be provided within an environmental statement (ES). However, in view of the circumstances prescribed within regulation 14(7) as to when an application for a scoping direction would become applicable, it may be the case that the Private Company has used the wrong terminology within its letter of request, and intended to request a scoping opinion pursuant to Reg. 14(1) rather than a scoping direction pursuant to Reg. 14(7). It may be helpful if the Private Company could clarify for PEDW its position on this. Reg. 14(1) confirms that; 'A person who is minded to make an EIA application may ask the relevant planning authority to state their opinion as to the scope and level of detail of the information to be provided in the environmental statement ("Scoping opinion").'

.

We are a community group which was initially created to address the specific proposal of the Private Company to run new overhead high voltage electricity lines supported by steel lattice pylons over a route of circa 96 km. As a community group we have evolved to consider and engage in national policy on new electricity infrastructure.

We are not named by the Private Company as a consultee within Appendix C of the scoping report. However, we note that para 4.11 of the report invites 'Additional suggestions from stakeholders who may have an interest in this project, and who may wish to be consulted for information to inform the EIA.'

The Scoping report declares that it serves the purpose of outlining the likely significant effects anticipated to arise from the construction and operation of the project. 'The scoping report sets out which environmental effects are considered likely to be significant, allowing for the relevant baseline, emerging design proposals and mitigation options that are available.'

The scoping report filed by the Private Company contains various representations as to the purpose of the scoping exercise. That:

- a) It ensures that the EIA process focuses on the likely significant effects;
- b) Provides an opportunity for consultees to comment on the proposed methodologies;
- c) Scoping is used to determine which likely environmental effects are assessed and presented within the environmental assessment;
- d) Scoping is an important phase of the EIA process as it helps to focus the EIA on assessing the likely significant environmental effects that are relevant to the Project.

The Scoping report which the Private Company has filed, highlights the importance of the Environmental Statement (ES) and of the EIA as a whole, of which the ES is part:

- a) 'The ES will report on the effects of the construction and operation of the project';
- b) 'The EIA process will aim to avoid, reduce and where possible mitigate likely significant environmental effects'.
- c) That pursuant to Reg 17(3) / Schedule 4 the ES should include a 'description of the reasonable alternatives; (for example, in terms of development design, technology, location, size and scale) studied by the applicant which are relevant to the proposed development and its specific characteristics and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.' [The Scoping report omits to mention, but Reg 17(3) confirms, that an ES should also include 'a description of any features of the proposed development, or measures envisaged, in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment];

d) That the purpose of the EIA is to 'assist the determining authority in considering the application for development consent and reaching an informed decision.'

Regulation 14(3) confirms that 'An authority receiving a request under paragraph (1) must, if they consider that they have not been provided with sufficient information to adopt a scoping opinion, notify the person who made the request of the points on which they require additional information'.

It is important to protect, and to put to best use, the available resources which PEDW can offer; there is a balance between providing an opinion which can shape the features of a formal application, but in the alternative, protecting against a waste of resources and time to deliver an opinion on proposals which do not yet appear to have been thought through or formulated with full or sufficient consideration. There is the risk of having to commit time and resources to deliver a second opinion if the current proposals are likely to be the subject of significant modification as a matter of course, and therefore it may be helpful for PEDW to invoke its power pursuant to regulation 14(3) to require further information as a pre-requisite to delivering a scoping opinion.

We will highlight some issues, identified within the scoping report filed by the Private Company, which it would seem helpful for PEDW to consider, relevant to whether the Private Company should provide more information and clarification at this stage, but also relevant to preparation of a scoping opinion in due course:

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- A. The Scoping Report (para 5.11) states: 'the costs and environmental impacts associated with undergrounding could make the Project unviable and therefore, the starting presumption of an OHL is considered to be the most appropriate technology type to be adopted, although as previously stated in Chapter 3, undergrounding may be considered in certain locations'.

The careful use of words is noted. Not that the costs and environmental impacts associated with undergrounding will make the project unviable but simply could make the project unviable. Just as the costs and environmental impacts associated with undergrounding could make the project viable. Just as the costs and environmental impacts of overhead lines with pylons could make the project unviable.

The careful use of the word 'could' would also seem indicative that the subject of cost and impact comparatives, and the matter of viability, has not yet been fully investigated by the Private Company, despite the fact that it first made known its proposals almost twelve months ago.

By use of the wording within its Scoping report, the Private Company appears to be positioning, to try and reverse the actual presumption in favour of undergrounding new power lines where

possible which is set out within PPW Para 5.7.9, and which has been reinforced many times by Welsh Government.

It should not be for a Private Company to presume a starting presumption in favour of overhead lines which is the complete opposite of the strong starting presumption confirmed within National planning policy, and the complete opposite of the preferred position of Welsh Government towards the undergrounding of all new power lines where possible.

Neither is it for a Private Company, by raising a mere possibility that undergrounding could make the project unviable, (which could apply either way, in that the wording leaves open the possibility that undergrounding could in fact render the project as viable), to expect to depart, or to commit to depart, or to expect PEDW and everyone else to entertain that we should depart, from the strong starting preference confirmed in PPW towards undergrounding where possible.

It should not be for a Private Company, to direct or angle, within a scoping report, or indeed in terms of its proposals from the outset, towards abandoning the priority and direction of the preferred position of the Welsh Government, confirmed within National Planning Policy, without the production of a scrap of evidence to suggest or support the possibility that one method could be more costly or impactful than another.

We are sure that PEDW will be alive to any form of subtle directioning or guiding, and that PEDW, within pre-application consideration, and certainly within the consideration of a formal application and in formulating its recommendations to the Welsh Ministers, will not be taken in by any efforts of a private company which could be construed as manoeuvring to move the goal posts to where the company would like them to be, by setting out proposals which are inconsistent with and opposite to the preferred position of Welsh Government, in the absence of any evidence base, and without the production of supporting evidence which is reliable, independent, accurate and audited.

We have recently corresponded with PEDW separately, relevant to the meaning and application of PPW Para 5. 7.9, and the nature of the evidence which PEDW could require any applicant proposing overhead lines to produce. We made the point in that correspondence, and would repeat it here, that the Welsh Ministers, will be the decision makers in any consent application for a DNS, assisted by the consideration and recommendations of PEDW; it is not for an applicant to make up its own rules, or to set the agenda, or to dictate the starting presumption, and if an applicant wishes to seek consent for overhead lines with pylons, despite the preferred position of Welsh Government that all new power lines should be underground where possible, it is the Applicant, on whom the burden and onus rests, and with whom the burden and onus remains, to establish and persuade that a position other than the preferred position of Welsh Government should be considered.

It may assist if PEDW is able to re-inforce to the Private Company, the meaning and effect of PPW, the onus which rests with the applicant, and the nature and extent of the evidence which PEDW would wish to see submitted, relevant to any attempt to move away from the preferred position of Welsh Government that new power lines should be underground where possible.

- B. The Private Company recognises that Schedule 4 /Regulation 17(3) of the EIA Regulations provides that the ES should include a “description of the reasonable alternatives (for example,

in terms of development design, technology, location, size and scale) studied by the applicant or appellant which are relevant to the proposed development and its specific characteristics and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”.

The Private Company notes that there is no statutory requirement to include an assessment of alternatives in support of a request for a Scoping Opinion. Yet the Private Company fails to consider or to disclose the benefits of including an assessment of alternatives within the scoping report, in order that the material could be considered by PEDW, and could be the subject of comment by PEDW within the scoping opinion. Further, that there is no statutory preclusion to prevent PEDW setting out within a scoping opinion, the nature and extent of the comparative considerations and the supporting evidence relevant to the comparatives within the ES to be filed, to allow for an assessment of alternatives, in a format and with sufficient and relevant detail, with adequate and sufficient supporting material, in order to better gauge environmental impacts and whether and the extent to which they can be avoided and mitigated by alternatives. In our separate correspondence to PEDW, we have suggested the nature and extent of the evidential data which would enable PEDW, to reach an ‘informed decision’ on the proposals, and this could usefully be incorporated into a scoping opinion.

It is very evident, from various statements within the Scoping report, that the Private Company has not yet conducted a full investigation into cable ploughing, and the potential for reduced costs, reduced environmental impacts and enhanced speed of delivery which this technology may offer. References within the report to undergrounding, point towards the open trenching and excavation methods. By example, para 3.38 refers to the need for a 25m corridor within which vegetation will need to be removed. Then in para 3.52 there is reference to a total excavation swathe of approximately 25 metres in width, and burying within a backfilled trench. Para 3.53 refers to just two techniques of undergrounding, being standard open cut and trenchless (drilling/boring) without any reference to cable ploughing. The references to undergrounding methods are incomplete, and in this context could be considered as misleading.

The fact the Private Company has not fully considered cable plough technology within the scoping report is without excuse. The Private Company has received representations on alternative technology, but yet there appears to be an intransigence, and a determination to reference undergrounding in terms which compare least favourably with overhead lines and pylons.

We are attaching, for reference, copies of the letters 28 April 2023 and 5 October 2023, which we have provided to the Company. Despite the representations to the Company, that in its own best interests, quite apart from the advantages of reducing impacts, it would be helpful for the Company to properly explore the advantages which alternative technologies, cable plough included, can offer, the Company has shown no commitment to take these considerations on board.

This is a Private Company which it seems is not learning or listening.

Within the Scoping report, the Private Company concedes that the installation of pylons and overhead lines will be a long and laborious process. The report confirms that for each single tower (pylon) site, there is an estimate of two weeks for the pylon, four weeks for the foundation to cure, two weeks for tower construction, and four weeks for conductors erection

and stringing foundation, but subject to the proviso that all the towers must be constructed before wiring can begin.

Yet despite the fact that undergrounding using cable ploughing, can offer completion of 1km per day, including installation and cover over, which potentially could allow a project of 96 km to be completed within 13 weeks with minimal further restoration, and despite the confirmation within the national planning policy that the preferred position of Welsh Government is for new power lines to be placed underground where possible, the Private Company, within the Scoping report, appears to be in denial of use of undergrounding with cable plough for the route, preferring to suggest undergrounding as some exception to the rule. The Private Company uses expressions such as: 'Undergrounding of the cables could be appropriate along sections of the corridor' and 'If it is deemed appropriate to consider underground cables'(Para 3.15) and 'UGC will be considered in the most sensitive landscape areas or where the presence of OHL will be particularly dominant and impactful upon visual receptors'.

Astonishingly, at this stage of the game, some 12 months after the proposals were first made public, and despite the very strong objections from community groups to the preliminary consultation in March, calling for undergrounding to be considered, and the strong policy statements issued towards undergrounding by the FUW and NFU (Cymru), the Scoping report contains the statement that: 'At this early stage in the development of the project it is not yet possible to identify where undergrounding could be considered appropriate.' (Para 3.12)

If PEDW is to receive from the Company, within the EIA process, an accurate and objective and evidence backed assessment of the impacts, including environmental impacts, from alternative methods and types of infrastructure available for delivery of the project, it would seem helpful for PEDW to direct towards this within the Scoping opinion.

- C. The scoping report states at para 1.17: A number of the proposed energy parks will be located in South East Wales – referred to as the South Wales Energy Parks. The options considered for connecting these energy parks to the NETS, including the rationale for the preferred option, are outlined in the 'Green GEN Phase One Grid Connection Strategy'.

The scoping report states at para 2.2: 'In early 2023 Green GEN Cymru undertook an appraisal of grid connection options to determine the most appropriate solution to connect the proposed South Wales Energy Parks to the NETS. This was compiled into the Green GEN Phase One Grid Connection Strategy'.

The scoping report continues at para 2.3: 'The Green GEN Phase One Grid Connection Strategy assessed and considered 11 potential connection options, within three broad geographical zones. These were the North Zone (including the existing substations in Trawsfynydd, Shrewsbury, Ironbridge and an option for a new substation in Lower Frankton), the South-East Zone (including the existing substations in Walham, Rhigos, Rassau and an option for a new substation in Abergavenny) and the South-West Zone (including the existing substations in Swansea North, Pembroke and an option for a new substation in Carmarthen). The options were reviewed against how they each performed on technical and environmental grounds, against the identified need to develop an efficient, co-ordinated and economic system'.

The scoping report delivered the conclusion at para 2.6: ' Overall, the analysis concluded that a route to a new substation in the Carmarthen area would offer the most appropriate solution having considered the environmental, technical and financial cost.

PEDW may wish to be aware, in compiling a scoping opinion, of serious issues apparent from an examination of the Green Gen Phase One Grid Connection Strategy document. Issues which were recorded in a letter 28 April sent to the Private Company. Issues which have not been acknowledged or challenged by the Private Company. Issues which would seem to undermine the decision making, the calculation, and the assessment of preferred route and environmental impact by the Private Company, and which suggest that the consideration and decision making was seriously flawed. Issues PEDW may find it helpful to request the Private Company to address in due course within the ES.

The Grid connection document pre-supposes that there will be no issue with making a connection into any of the 11 substations which are offered as potential options. It presupposes there will be no issue as to headroom capacity within the NETS line at the 11 separate potential connection points into those lines. The document leaves open that each of the 11 substations is equally available. Therefore the methodology used within the Grid Connection document for determining which of the 11 connection points is best, is very much route led rather than substation led.

The assumption is that the exercise of determining the best connection point/ route option, involves plotting eleven alternative routes, in each case to take a route referenced from the proposed Energy Park or Energy Parks to be served by the line, to the potential sub-station, in each case governed by environmental, technical and costs considerations.

PEDW will note, upon reviewing the Grid connection document, that the technical and environmental grounds, are addressed with extreme brevity. They sit behind and are governed by, the possible arrogance or ignorance of the Private Company, of assuming a starting presumption in favour of overhead lines without setting out any meaningful consideration of alternative technology, including cable ploughing, which could have changed the assessment of route, by impacting on the technical and environmental considerations.

Environmental is applied first to determine each of the potential 11 route options. Then, once the alternative routes are identified using environmental, the distance is identified. The distance is used for the only technical consideration (the longer the route the more lost through transmission) and then distance is used to work out cost.

However, the environmental consideration is simplistic, reflecting, and based on, the fact that the Private Company has decided to utilise overhead lines with pylons, without a supporting evidential base, and without regard for the preferred position of the Welsh Government to underground wherever possible. The environmental, is so simplistic, that it is limited to seeking to avoid designated National Parks and designated AONBs and very limited designations.

This methodology for environmental, impacts on distance, as to avoid overhead lines routing through a National Park or a designated AONB, the Private Company add in to the calculation of distance, the additional distance to take OHLs around rather than through the National Park or AONB before reaching the intended substation in each case.

So, by starting with the presumption and acceptance that overhead lines and pylons will be used, the Private Company has considered possible route so as to avoid designated areas in which

overhead lines would be discouraged, with the consequence for each of the eleven options, some more than others, of considerably greater distance.

Then the Company applies a basic technical assessment, which is the only technical assessment referenced, that the longer the distance the greater the energy loss in the process of transmission, to justify that the shortest of the eleven possible routes would be best suited. The technical consideration is simplistic and tied to the calculation of distance. Put simply the technical consideration is limited, and no more scientific, than the notion or presumption that the longer the distance, the greater the energy loss as part of transmission. The longer the distance the greater the energy loss along the way between the energy park and the substation, but without any evidential base provided.

Then the Company proceeds to assess costs, on the basis the shorter the distance, the less costs, and therefore the shorter distance is less costly and best suited. The calculation of costs, is based on the distances which the Private Company has arrived at, but the calculation assumes the company position that undergrounding could be 6-10 times more expensive and more impactful, which the Company has not evidenced or supported.

The decision to run a new high voltage line, over a distance of circa 96 KM to connect to and requiring a new sub-station near Carmarthen, has been pre-determined by a Private Company assuming and proposing the use of pylons, without first making a concerted effort to collect or consider or publish any up to date and accurate information as to the comparatives between pylons and alternative technologies, including undergrounding using cable ploughing/drilling, and electing for the use of overhead lines and pylons without producing an evidence based consideration of all alternative options.

To compound matters, the calculations of distance for each of the alternative routes / potential connection points to the NETS, considered by the Private Company, seem to be distorted, because the starting point for the eleven options is unreliable, whilst the calculations for one specific project factored in measurements for an entirely separate and distinct line which may be brought forward by the Private Company as an entirely separate proposal. These distortions seem to prejudice the findings put forward by the Private Company as to distance, and therefore render unreliable the selections based on technical and environmental and costs considerations.

The method of the Private Company is described as calculating a point-to-point line and then adding any extra needed to circumvent NPs and AONBs. However, for each measurement provided for any given line, there is no means of independently verifying whether the figure is correct or the method for seeking to calculate it correct. The Private Company does not provide co-ordinates for the proposed energy park(s) to be served by the single line (Towy Usk) or the starting point to be used for the lines to connect the proposed energy park() to the available substation for each of the eleven alternative routes.

In calculating the distances relevant to each of the eleven alternative new or extended substations, the Private Company adopts a point-to-point measurement. Instead of taking the location of the proposed Nant Mithil, as the starting point, for the route to each of the eleven alternative substations, the starting point used relevant to Nant Mithil, is instead a median point between each of the Energy Parks within the 'Eastern Cluster'. The planning process is underway for Nant Mithil. The consent application for the proposed 'Towy Usk' line as a DNS is necessarily linked to Nant Mithil. The three other possible energy parks, which might form the so called Eastern cluster, should those proposals proceed, and should they be consented, if not progressed to consent applications in

tandem with Towy Usk, must be irrelevant for the purpose of calculating comparative distances of the transmission line which is to be the subject of an application for consent. The adoption of a median point, moving the start point for calculation of the distance of the eleven alternative lines running from the median point, considerably to the West in comparison to the use of Nant Mithil as the start point, impacts on the calculation of the distances for the comparative routes, increasing the distances to the alternative sub-stations to the East of proposed Nant Mithil, and shortening the distances to those routes to the West, including Option 11 (Carmarthen).

Also, noticeably, possible connections at Bishops Wood and Feckenham, had not been considered at all for the purpose of assessing alternative routes.

A further distortion, which appears to render the comparative distances and conclusions offered by the Private Company as wholly unacceptable, as unreliable and incorrect, is the method adopted within the Grid Connection document of weighting the calculations by adding measurements for a second and unrelated line.

This is not immediately apparent, without careful scrutiny of the consultation documents published for the preliminary consultation, including the Grid Connection document. Each of the other consultation documents issued by the Private Company as part of its preliminary consultation process was endorsed prominently with the legend 'Green Gen Cymru', and in addition was endorsed with the name given by the Private Company to the proposed project: 'Green Gen Towy Usk'. Within the document library published by the Private Company, the Grid Connection Strategy Document was sandwiched between a consultation leaflet/press notice and a considerable routing and consultation document. The consultation leaflet, and the routing and consultation document, prominently displayed both the legend Green Gen Cymru and the words 'Green Gen Towy Usk.' The Grid Connection document carries on the front page, similar to the other consultation documents, the image of a rural scene and the prominent legend 'Green Gen Cymru.' What is not evident, until examining the document carefully, is that unlike each of the other consultation documents produced on the Green Gen Cymru website, this document, whilst carrying similar features and common presentation, is the only document which does not carry the name of the project Green Gen Towy Usk. An explanation, becomes apparent.

On reading the Grid Connection document more than once and setting aside the assumptions which appear to have been cultured, inadvertently or otherwise, by a document introduced as part of a specific consultation about one specific proposal, the realisation arrives that the methodology for comparing Green Gen Towy Usk, with the routes for reaching each of the other ten potential substations offered as alternatives, in terms of costs and technical, seems evidently flawed.

On reading the Grid Connection document carefully, setting aside the glossy presentation, the packaging and the obvious association and innuendo that it must relate entirely to the specific Green Gen Towy Usk proposal, as it was offered as a consultation document as part of a public consultation for that specific proposal, it becomes evident with scrutiny, that the Grid Connection document has a much wider scope which distorts and renders unreliable the calculation it offers in the context of the Green Gen Towy Usk proposal.

The Private Company identifies in the Grid Connection document, the possibility of developing Energy Parks which it numbers 4 and 5, and which it refers to its 'Western cluster'. 'Separate to possible Energy Parks 1, 2, and 3, which together with proposed Nant Mithil, are identified as the 'Eastern Cluster.' The Grid Connection document identifies the Western cluster and the Eastern cluster, collectively, as the South Wales Energy Parks.

The executive summary, within the Grid Connection document, referring to the proposed new substation near Carmarthen, states the South Wales Energy Parks, located in Powys and Ceredigion would be connected to this new substation via two separate 132kv routes.

The Grid Connection document does not specify the exact route of the separate 132kv line which will serve the Western cluster (for ease of reference now referred to the 'Western line'). It simply indicates the Western line will eventually reach the same substation as the proposed Green Gen Towy Usk line. However, it is clear that the western line will be distinct, different, and independent from the proposed Towy Usk line, backed up by the capacity of each line and the capacity of the separate generating stations which both are intended to serve.

As such any future consent application for the Western line would be a separate application by way of a completely separate planning process. Just because the Private Company might be involved in both projects does not entitle it to combine two separate and distinct proposals within one consent application. In any event, the western line consent application, if it proceeds, may be filed by an alternative company. Clearly Green Gen does not propose to combine two separate and distinct proposals within one single consent application as the public consultation, which is the preliminary step for the proposed consent application for the proposed Towy Usk line, is specific to Towy Usk and makes no effort to extend and include the separate Western line.

A document issued as part of a consultation process for a specific and defined proposal, could naturally create the assumption, that the cost, technical and environment comparisons within the document have been provided specifically and exclusively for each potential line from the proposed Nant Mithil Energy Park, or even from the median point of the Eastern cluster, to each of the eleven potential locations for a new or extended sub-station. Unfortunately, not the case.

The Grid Connection document contains the statement: 'The point to point measurements used within this section refer to the total distance from the central point of the Western cluster of energy parks to the connection substation **combined** with the total distance from the central point of the Eastern cluster of energy parks to connection substation.' The word '**combined**' is highlighted in this letter for emphasis, but is not so highlighted in the text of the Grid Connection document.

In the event, in putting forward calculations to determine if the Towy Usk line would be longer or shorter than the alternative lines from proposed Nant Mithil or the median point of the Eastern cluster, to any of the alternative substations (distance being relevant to cost and transmission loss) Green Gen seems to have muddled the waters and distorted the calculations by including in its calculations measurements attributed to the Western cluster, despite having recognised in its own document that the Western cluster will be served by a distinct and separate line.

The Private Company repeated this erroneous methodology for each of the 11 options considered.

To do so may have been an inadvertent mishap, which if so, could be indicative of incompetence, or in the alternative, in the context of the specific proposals for 'Towy Usk', the use of distances correlating with the western line, may have been carefully introduced, but with the consequence, that in the context of this specific proposal, it would seem confusing and misleading. To calculate the costings for the route to a new proposed sub-station near Carmarthen, and to calculate the costings for the routes to each of the other possible sub-stations, by aggregating the separate costs of the Western line, appears to suggest a marked absence of judgement, either by not thinking through the comparative options, or thinking of them but including them anyway, hoping that no-one would notice. Whether bad faith or bad judgement, as may be applicable(we have asked the Private Company to comment and clarify) it seems the distinct, separate and independent western line

should form no part of the calculations of distance, relevant to energy loss, construction costs or lifetime costs; it seems the proper course, for each of the eleven options, would be to calculate the Eastern line, quite independently, without inclusion of the Western line. It is for the Private Company, to explain its position, its reasoning and its actions. PEDW may require the Private Company to do so.

Therefore the calculations, and accordingly the costings for the route to each of the eleven potential sub-stations, appear to have been distorted and rendered wholly unreliable.

By way of example, within the assessment of Option 11 (the Tywi valley route), the measurement from the midpoint of the Eastern cluster to the location of the proposed substation at Llandyfaelog was calculated as a total measurement for OHL of 70km. There was an additional 5km for skirting a small part of the National Park. However, the Private Company also added, with no apparent good reason, a measurement (45km) from the centre point of the Western cluster to the location of the proposed substation at Llandyfaelog and then aggregated the two measurements. The total of 120km (70 plus 5 plus 45) was used to calculate the costing for the proposed Tywi Valley route by multiplying the total measurement (120km) by the assumed cost for OHL of 0.5 million per km to arrive at a figure of 60 million. However the costing, for OHL, setting aside for the moment the correct start point for the line, should be the measurement for Towy Usk alone (without including the separate and unrelated cost for the Western line), reducing the cost substantially..

The Private Company has assumed the cost for converting an existing substation to allow for connection to the NETS, as 10 million and the cost of a new substation such as would be required at Llandyfaelog, is assumed as 25 million. No evidential support is provided for the assumed costings. No allowance is made for the size of the new sub-station required or the size of the requisite extension, and It should be factored in as appropriate that the Private Company may have limited or no capital contribution to those costs which would be satisfied by National Grid Electricity Transmission.

Taking into account, the seemingly erroneous method of adding in connection distances for the Western cluster the comparative OHL measurements (including diversion around National parks or ANOBs or other designated sites), and therefore not applying/setting aside the distances relating to the western line, therefore relying for the moment (but without acceptance), on the figures and distances offered by the Private Company based on the Eastern cluster alone, the comparative figures are Abergavenny 60km (50km point to point plus 10 for re-routeing around designated areas,) Carmarthen 75km (70km direct point to point plus 5 for re-routing), Swansea North 80km (65 plus 15 including 5km of undergrounding), Rhigos 105km (40 plus 65) Rassau 110 km (45 plus 65). Comparative costings, for route only involving OHL calculated on these distances at 0.5m per km, are Abergavenny (30m), Carmarthen (37.5m), Swansea North (54.5m), Rhigos (52.5m) and Rassau (55m). Adding the substation costs for the two shortest routes, of 25m for Carmarthen, and 25m for Abergavenny, the total cost for Abergavenny is 55m and Carmarthen is 62.5m.

If the Private Company having considered alternative engineering methods, particularly cable ploughing/drilling, whereby any impact and biodiversity can be minimised or circumvented by the engineering techniques which may now be available, to allow for placement of cables underground, following the precedent within Snowdonia National Park and other National Parks or designated AONBs, within the Visual Impact Provisions scheme, or the parallel VISTA scheme in Scotland, then relying on the distance calculations given by the Private Company, for direct point to point distances for route only, then to Rhigos would reduce to 40 km, to Rassau 45 km, to Abergavenny would reduce to 50km, Swansea North 65km, and Carmarthen 70km. The Eastern sub-stations, such as

Shrewsbury, Ironbridge and Lower Frankton, are also better calculated with the benefit of an accurate measurement from the proposed Nant Mithil alone.

The cost comparisons based on the direct point to point measurements given by the Private Company(using the Company figures for undergrounding for convenience without agreement) provide for the following cost comparisons : Rhigos 136m, Rassau 153m, Abergavenny 170m, Swansea North 221m, and Carmarthen 238m.Of course, the costs differentials between undergrounding and overhead lines, could be far less than made out by the Private Company, and the construction and whole life costs compared with pylons for 132KV may be broadly similar, especially as the undergrounding costs should be reduced significantly if cable ploughing is used as an alternative to open trenching and excavation. That falls to be determined, but in terms of like for like, then by undergrounding, using the costs, and energy loss arguments, employed by the company based on distance alone, a new substation and connection point at Carmarthen, becomes the least attractive option.

If the costs of UGC are to be compared to the costs of OHL, then rather than comparing the costs of OHL and UGC for the entire Towy Usk route(total circa 96km) with the cost of undergrounding the entirety of the same route, a more appropriate comparison could be to compare the cost of OHL for the entire Towy Usk line of 96 km with the shorter route calculated point to point in order to underground to the proposed new sub-station at Carmarthen, or to compare the OHL costs for the entire route of 96 km with the shortest point to point route to one of the alternative proposed new or extended sub-stations which undergrounding using cable plough would permit.

It is interesting and noted, that within the scoping report, the Private Company has acknowledged, that as a licence holder (if a licence is issued) the Private Company would be required to adhere to Sec 9(1 (a) of the Electricity Act 1989, which places specific requirements on a distribution network operator, including “the development, maintenance, and operation of an efficient, co-ordinated, and economical system for the distribution of electricity”

- D. The Private Company confirms, at Para 2.7. of the Scoping report, that ‘having identified that a 132kV connection to a new substation in the Carmarthen area was the most appropriate solution, Green GEN Cymru undertook a routeing process to identify the most appropriate route for the overhead line connection’. The Private Company indicate that the overall approach taken to routeing by Green GEN Cymru is based on the acknowledgement that the main effects of an OHL are landscape and visual. Subsequently in the report, the Private Company touches relatively briefly upon visual amenity, cultural heritage, archaeology, ecology, ornithology, hydrology, hydrogeology, geology, water resources, landscape character, land use including agriculture, forestry and recreation However, there is reference within the scoping report, to scoping out the need to consider some factors.

It is so important that the list of considerations does not exclude important issues, and that issues which should be given sufficient weight are not ‘scoped out’. It will be imperative that PEDW can provide direction on this within the scoping opinion. The Private Company may otherwise seek to avoid, or may omit to address sufficiently or at all within the ES, matters such as the likely effect of

traffic and transport, including the widening of minor roads and the removal of hedges, noise, land disturbance, deprivation of the use of land, both during construction and restoration, and ongoing post restoration during the lifetime of the project, economy including impacts on visitor revenue, tourism, diversification of agricultural holdings and property devaluation, socio economics, decommissioning, health and wellbeing, major accidents, bio-diversity, environmental and climate change.

As historical landscape, heritage and historic features will be an important consideration relevant to the use of overhead lines with pylons, it would seem expedient for a direction within the Scoping opinion towards the preparation of an ASIDOL, to be commissioned at the expense of the Applicant, to be filed with PEDW together with the ES.

The scoping report provides some information to hint at the enormity of the disruption and effect of the proposals on people, their everyday lives, and the environment. The impact from the manufacture, transport, construction, maintenance, repair and de-commissioning of pylons is often overlooked. Within the scoping report, there is mention, without emphasis, and without sufficient direction of the need for careful consideration of consequential impacts, of just what would be involved in the process which the Private Company is currently proposing. It is important to understand the reality and enormity of what is involved in the manufacture, transport and construction of pylons, so that the impacts can be properly evaluated.

The Private Company concedes that towers /pylons may be greater than 27 metres.

Prior to constructing the overhead lines, 'temporary access' will be constructed as necessary(Para 3.19) Therefore unless a pylon is immediately adjacent to a highway, and accessible therefrom, there will be a need for the construction of a road or track leading to the site of each individual pylon within the proposed route. Therefore a roadway to each site, every 200-250 metres along a route of circa 96 km, as 'access for plant and equipment to every tower (pylon) location will be required during construction.'

The report confirms, that where it is not possible to use the existing highway, a haul road will be constructed alongside the overhead lines. It is important to remember the need for access infrastructure to reach the OHL as well as the pylons.

For access tracks 'this will involve the removal and storage of topsoil and the placement of suitable haul road materials. Stone will include imported stone from a wider area.

Para 3.31 indicates an intention to use low ground pressure vehicles, or otherwise to use steel matting or timber roadways. There will inevitably be heavy or substantial equipment. Pylons are erected by use of a mobile crane.

Towers will be delivered to the relevant construction areas in section by HGVs of standard size. 'Conductors and stringing equipment will be delivered to the construction area by HGVs in large rolls.' (Para 3.25)

At each of the tower locations a winch and tensioner will be set up at opposite ends.

The foundations for each pylon will require concrete beneath each leg position. 'The depth of foundation is typically 3m to 5 m in depth.

To serve each individual pylon site, there will be a need to establish lay down/storage areas.

'L7 tower (pylon) locations have a typical working area of approx. 25 metres x 25 metres for standard towers and 50 metres x 50 metres for angle towers.'

There will also be 'temporary pulling areas' at pylon locations every 3-4 km. 'The temporary pulling areas are approx. 20 metres x 50 metres'

For the switching station, there will be a requirement for ground clearance and a concrete foundation. The switching centre to be 80 metres x 90 metres.

Any trees which impact on safety clearance will be removed or topped (Para 3.19). A '70 metre corridor is the standard clearance for 132 kv-to be kept as open ground for the lifetime of the project.'

'After completion, all compounds, haul roads and access tracks will be re-instated in accordance with the requirements of any planning permission'. Therefore, only to be removed, if removal is a condition of the planning consent, and remembering there will be a need for access ongoing for repair and maintenance.

The Scoping report confirms 5 to 9 tons of steel for each tower and 9-17 tonnes of concrete for each pylon base depending on the type. The Company estimate, which has not been verified, is that the project will involve between 3600 to 6800 tonnes of concrete and 2000 to 6000 tonnes of steel.

The Scoping report concedes that 'exposed elements which suffer from corrosion, wear, deterioration and fatigue, will require inspection approximately every 12 months and periodic maintenance over the lifespan.' 'Fittings and insulators may require replacement after 20 years.'

The Scoping report stresses within para 3.11 that it is essential that any proposal for the undergrounding of the cable infrastructure includes a detailed consideration of the likely significant impacts.

We would anticipate that PEDW may wish to require from the Private Company, a full comparison of the potential impacts both of the use of overhead lines with pylons, and for alternative technologies including cable ploughing, together with an independent and objective analysis of how impacts can be mitigated or diminished altogether, depending on the technologies used.

Accordingly, the need to avoid the scoping out of important considerations which could shape the project, and which could be material in the determination of a consent application in due course.

The Private Company seems shy of engaging in a full and proper consideration of environmental and bio-diversity impacts, including the comparative carbon footprints of the proposed overhead lines with support pylons, and alternative and perhaps less impactful technologies. Consideration of the carbon footprint, could be scoped out, if the scoping report is followed, and unless PEDW is robust in its response.

Climate change is a motivator for changes in the source of energy production, but is also a very important consideration when assessing the new electricity infrastructure to be used to convey clean energy, and how that infrastructure will itself impact on climate change. It would be unfortunate, if in pursuit of climate change, the fundamental issues of climate change and environmental protection should be lost or discarded in terms of the type and method of infrastructure to be used.

We would ask PEDW to consider inclusion within the scoping opinion of a clear directive, towards proper consideration, evidence based, objectively and independently calculated, of the carbon footprint of the proposed overhead lines with pylons, and a comparative as to the carbon footprint of the alternative technologies available, including cable ploughing. For each method identified, the Applicant to provide a reliable and objective assessment on the individual carbon footprint relevant to:

- i) the extraction of the materials required for manufacture;
- ii) the transportation of materials required for manufacture;
- iii) the manufacturing process;
- iv) the transport of component parts from the place of manufacture to the place of assembly;
- v) the transport of products from the place of assembly or manufacture to the proposed site
- vi) the construction of road /tracks over land to facilitate access to the proposed location;
- vii) any excavation work on site;
- viii) the manufacture of the materials required on site to facilitate erection/installation;
- ix) the transport of the materials to the proposed site;
- x) the transport of relevant equipment and machinery to the site
- xi) the construction work on site
- xii) commissioning;
- xiii) the removal of access road /tracks and restoring the ground after erection/installation
- xiv) the necessary works of de-commissioning and re-mediation.

The scoping report suggests that environmental topics that 'are not likely to be significant are proposed to be 'scoped out' of the assessment.' (Para 4.9). It seems imperative that environmental topics are not overlooked, or under-valued, in any assessment of a Development of National Significance.

The Scoping report contains a number of inconsistencies, which are not relevant to the content of the Scoping opinion, but which we will refer to briefly, simply to correct or avoid any allusion or misunderstanding.

The Private Company provides an overview of Future Wales and PPW, which is incomplete, and appears to be selective.

The Private Company declares that it :‘will follow best practice in ensuring that communities have a strong voice in the process, yet issues arising with the preliminary consultation process for the self-styled ‘Towy Usk ’ project,, documented in our letter 28 April 2023 sent to the Company, were not corrected or addressed and were repeated in the preliminary consultation process for the Vyrnwy-Frankton, as detailed in our letter 5 October 2023 sent to the Private Company, which has remained without reply.

The statement that Bute Energy is set to become a leading developer, may be regarded as presumptuous for a company and its associated companies, none of which have any consents, or licences to operate. It also seems indicative of a company which can talk itself up, creating an illusion of a bigger player, spending its initial funding in a way which can curry favour, whilst diverting away from a company and its associated companies, which do not appear to have saleable assets or fixed assets, and for which accounts filed at Companies House point to significant debts, liabilities and loss.

‘Bute Energy is forward thinking in everything it does’ (Para 1.9), yet by contrast, a company which has engaged in public consultation exercises which seem inconsistent with the helpful advice on best practice issued by PEDW/the Planning Inspectorate, from time to time. The claim to be forward thinking also seems to be at complete variance with a private company which has published proposals impacting on property transactions/values/saleability, and causing prejudice and upset, without first properly investigating or fully considering or evidencing the alternative technologies available, or the full range of applicable considerations. Not forward thinking in seeking to apply an alternative method as an alternative to pylons, especially as pylons, within the Ofgem sponsored VIP and Vista projects, are being removed as mistakes of the past.

The scoping report states that the ‘Operation of infrastructure at 132kV within Wales is classified as ‘Electricity distribution ’ (Para 1.19), and confirms that the Private Company has applied for an Independent Distributors Network Operators licence. The Private Company would need to review the definitions of ‘Transmission’ and Distribution’ within the Electricity Act 1989.

The Private Company has caused a great deal of alarm and distress to affected communities by publishing firm proposals without first sufficiently evaluating alternative options. Now the Private Company seems to be repeating a similar pattern by requesting PEDW to enter into a scoping exercise on proposals which do not seem to be properly formulated; proposals seemingly without the benefit of a considered and full evaluation of alternatives.

We sincerely hope that in considering the material to be included within the scoping opinion, and the desirability of clarification and further information before issuing a scoping opinion, the content of this letter will provide some assistance to PEDW.

As a matter of courtesy, as this letter is specific to the potential application which the Private Company may pursue, we will provide a copy to the Private Company directly, and this is considered as an open letter.

Llanarthne Area Community Pylon Group

Proposal as to evidence to be filed with an application to the Welsh Ministers for new overhead power lines:

A) The Applicant to indicate within or accompanying the form of application whether it is the Applicant's submission that it is impossible for new electricity cables for its intended purpose to be laid underground.

If there is a submission based on impossibility, evidence to be filed, specific to the voltage to be carried by the proposed system:

- a) To identify and confirm the alternative methods which exist in order to erect or install new electricity cables underground, including cables laid using cable ploughing, underground cables laid using open trench excavation, undergrounding by way of drilling or tunnelling;
- b) To confirm any technical variations or options, applicable or available for each method;
- c) To confirm what each alternative method, considering in each case any available technical variations, can offer and achieve or permit; to explore, the technical possibilities and limitations of each method, to include consideration of ground conditions or terrain, and for the given variables of distance depending on method, a consideration of loss of energy during transmission and heat loss/retention.

B) The Applicant to indicate within or accompanying the form of application whether it is the Applicant's submission that the Welsh Government's preferred position on new power lines, that, where possible, they should be laid underground, should not be paramount, and instead, that a balanced view must be taken against costs which could render otherwise acceptable projects unviable.

If so, evidence to be filed, specific to the voltage to be carried by the proposed system:

1a) To identify and confirm the alternative methods which exist in order to erect or install new electricity lines overhead, and new electricity cables underground, including pylons, cables laid using cable ploughing, underground cables laid using open trench excavation, undergrounding by way of drilling or tunnelling;

1b) To confirm any technical variations or options, applicable or available for each method;

1c) To explore what each alternative method, considering in each case any available technical variations, can offer and achieve or permit in terms of the technical possibilities and limitations of each method, to include consideration of ground conditions or terrain, and for the given variables of distance depending on method a consideration of loss of energy during transmission and heat loss/retention.

2) To identify all 'potential proposals', defined as proposals which are physically possible, including the type of infrastructure preferred or proposed by the applicant and respectively

proposals for each individual type or method or combination of the types and methods which are physically possible, and for the purpose of 'potential proposals' discounting and disregarding any reference to or consideration of costings or funding.

3) To confirm and evidence for potential proposals identified as per para 2, the likely costs and the relevant scale of costs (exclusive of compensatory payments but factoring in economies of scale) relevant to manufacture, transport from place of manufacture/assembly to site, installation, commissioning and restoration;

3b) To explore, for otherwise acceptable proposals identified as per para 2, any potential secondary costs, such as any requirement for re-routeing or placing underground of any existing gas, oil, water communications or electricity cables including lower voltage cables, situate within a prescribed proximity to new electricity infrastructure.

3c) To explore, for each otherwise acceptable proposal identified, the nature of compensatory payments payable and the method of assessment and calculation, and based thereon but also factoring in Land Tribunal decisions and reflecting voluntary settlements, to provide a projection or assessment, for the preferred route in the case of the proposal which is the subject matter of the application, and for the most beneficial or appropriate route for each otherwise acceptable proposal, of the likely value of compensatory payments for: i) loss of property value; ii) disturbance including the costs from displacement and any consequent loss of net revenue ; iii) any other matter not directly based on the value of land.

4) Relevant to costs (and also relevant to practicality) the projected loss, given varying sample time periods, attributable to delay in delivering new overhead electricity infrastructure, by reason of public and community objection and/or refusal by land owners to allow voluntary access onto land for preliminary survey or for designated works, and/ or resistance from legal challenges/ obstruction by way of civil disobedience to the exercise of compulsory powers.

5) Relevant to costs (and also relevant to practicality), to identify and evidence, respectively, for each of the potential proposals as identified as per para 2:

- i) The estimated longevity of the infrastructure;
- ii) The anticipated frequency of repair works,
- iii) The method of obtaining access for anticipated repair;
- iv) The works expected in order to undertake anticipated repair;
- v) The likely time period for completing anticipated repairs;

- vi) The likely costs for completing anticipated repairs;
- vii) The nature of works required and the frequency for routine maintenance;
- viii) The method of obtaining access for anticipated routine maintenance;
- ix) The likely time period for completing any anticipated routine maintenance;
- x) The likely cost of anticipated routine maintenance;
- xi) The potential frequency and cause of outages;
- xii) The likely cost per hour of outages and the anticipated average duration for outages;
- xiii) The projected financial consequence of loss of energy during conveyance.
- xiv) The works required by way of decommissioning,
- xv) The anticipated costs of decommissioning;

6.To establish, for each of the potential proposals as identified as per para 2, the availability and location of materials required for manufacture, the availability and location of suitable manufacturers, the estimated time period from order to supply as per existing or potential supply chains, the availability and location of suitable contractors, and the estimated time period for erection/installation between the issue of consent and commissioning and between commissioning and the completion of restoration.

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7. For each of the potential proposals as identified as per para 2, to obtain a reliable and objective assessment on the individual carbon footprint relevant to:

- i) the extraction of the materials required for manufacture;
- ii) the transportation of materials required for manufacture;
- iii) the manufacturing process;
- iv) the transport of component parts from the place of manufacture to the place of assembly;
- v) the transport of products from the place of assembly or manufacture to the proposed site
- vi) the construction of road /tracks over land to facilitate access to the proposed location;
- vii) any excavation work on site;
- viii) the manufacture of the materials required on site to facilitate erection/installation;
- ix) the transport of the materials to the proposed site;
- x) the transport of relevant equipment and machinery to the site
- xi) the construction work on site
- xii) commissioning;
- xiii) the removal of access road /tracks and restoring the ground after erection/installation
- xiv) the necessary works of de-commissioning and re-mediation.

8. For each of the potential proposals as identified as per para 2, the extent and nature of the potential disruption or prejudice in terms of:

- i) Biodiversity and ecology, including ecological habitats and species, and recovery of eco systems,
- ii) Archaeological remains
- iii) The extent of ground disturbance, including mixing of soil ,soil composition and land drainage, relevant to transport, construction, remedial work, maintenance and de-commissioning.
- iv) Interplay with future land uses.
- iv) Adverse- social, business and revenue impacts.

9. Relevant to each of the potential proposals as identified as per para 2;

- i) To identify and confirm a knowledge of recent, current or proposed projects involving new electricity infrastructure of the same or similar type and nature, referencing information from the companies, funders, contractors and any other relevant parties involved in those projects not only as to technical feasibility, impacts, and costings, but also the available methods and means of funding. Any costings for comparative schemes to be assessed in the context of similarity or otherwise of the project specifics including terrain and ground conditions to highlight if the costings for one comparative could be distorted or exaggerated if circumstances such as terrain or ground conditions are far more favourable for one rather than for another.
- ii) To identify and confirm the method and feasibility of funding any differential of costs for alternative methods, if indeed a differential exists; and to confirm the method and feasibility of funding the costs involved respectively for each of the potential proposals as identified as per para 2, to include available or potential Ofgem funding or allowances or consents, the potential for funding from the revenues, margins, profits, and returns anticipated as available to the Applicant and its investors(identifying and outlining projected revenue, profits, margins and returns for each potential proposal, to give context, the objective and accurate evidence and assessment to be provided from an objective and reliable source), any contribution available from soft loans or incentives, the availability of financial help from Government, any form of partnership or co-operation or involvement from Government, or the possibility of actual or improved viability by way of an equity share for Government.
- iii) The projected, profits, margins and returns for the Applicant and its funders prepared for or by the Applicant and filed with Ofgem, in order to give context to individual project costs for the actual proposal;
- iv) Projections as to the revenue, gross and net of operating costs, with a projection of the comparative costs of repaying capital and capital costs, (being capital required as borrowing to complete the construction and installation and restoration, and borrowing for projected ongoing maintenance and repairs), of any associated company responsible for the development or operation of an associated generating station, as viability or otherwise can only be assessed in the context of the financial rewards of the Applicant and its investors from the proposed scheme and the financial rewards for the associated companies intending to use the project.

10. Any projections as to costs, and any projections as to gross and net revenue, profits, margins and returns, and any financial or commercial evidence originating from the Applicant or commissioned by the Applicant, to be independently audited and verified by one of the main four auditors (KPMG, Deloitte, PWC or Ernst and Young, at the cost of the Applicant, as a pre-requisite to its submission to PEDW and a certificate of compliance from the auditor to be filed with the material submitted.

Proposed sources: The evidence to include the review of any report, data, assessment or analysis available in the public domain, and in addition, enquiry of suitable experts, including academics, energy regulatory bodies, industry associations, energy companies, contractors, sub-contractors, investors, financiers or any other relevant party with expertise or experience.

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