

EIA Scoping Direction

DNS CAS-03094-T7D9G0: Green GEN Towy Teifi

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This Scoping Direction is provided on the basis of the information submitted to Planning and Environment Decisions Wales on 03 May 2024, 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 double circuit Over Head Line (OHL) approximately 52 km in length by Green GEN Cymru.

The request was accompanied by a Scoping Report (SR) ‘Green GEN Towy Teifi - Scoping Report, dated May 2024, along with several appendices, that outlines the proposed scope of the Environmental Statement (ES) for the proposed development:

2024-05-03 - EIA Scoping Direction Request - 01 - Scoping Report and Appendices available via the Planning Casework Portal - <https://planningcasework.service.gov.wales/> and search **CAS-03094-T7D9G0**

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 proposed scheme will provide a connection from the proposed Lan Fawr Energy Park located east of Llanddewi-Brefi and southeast of Tregaron, which will terminate at the proposed National Grid substation of Carmarthen, via an adjacent, new 132 kV substation. The overall route is approximately 52 km in length and will follow in a northeast to southwest direction, passing within the administrative boundaries of Ceredigion County Council and Carmarthenshire County Council.

Further information is available in section 2 of the SR.

3. Proposed Development

The proposal as described in the SR is for a double circuit OHL approximately 52 km in length, comprising overhead cables supported on ‘L7’ steel lattice towers (or similar) with six cross-arms (three on each side). The required voltage for the OHL is 132 kV.

Further information is available in section 2 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 the ES, any maps, drawings and illustrations that are proposed to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections.

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 the route is located in a predominantly rural area comprising a mix of fields and hedgerows enclosing pasture, with scattered farms, small linear and clustered settlements, and individual dwellings.

5. Consultation

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

- Ceredigion County Council
- Carmarthenshire County Council
- Cadw
- Natural Resources Wales (NRW)
- Soil, Peatland and Agricultural Land Use Planning Unit (LQAS), Welsh Government
- Transport Directorate, Welsh Government
- Dŵr Cymru Welsh Water (DCWW)
- The Health and Safety Executive (HSE)
- Mid and West Wales Fire and Rescue Service
- Network Rail
- Transport for Wales

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

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.

There may be other types of development that could have cumulative impacts with the proposal, and it should not be assumed that the consideration of cumulative impacts can be restricted to overhead lines or renewable energy proposals.

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 (not as a standalone chapter)
Population and Human Health (not as a standalone chapter)
Decommissioning
Material Assets and Waste
Landscape and Visual
Biodiversity
Cultural Heritage
Air
Noise and Vibration
Traffic and Movement
Geology and Hydrogeology
Land and Soil
Water
Cumulative Effects

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 outlining their expectations regarding the content of the description of the development in the Environmental Statement (ES).
ID.2	2.71 – 2.83	Underground Cabling Infrastructure	PEDW notes the Scoping Report (SR) states undergrounding may be considered in certain locations and that the SR acknowledges that the undergrounding of cable infrastructure, whilst reducing visual impacts, generates additional impacts due to ground disturbance. It is welcomed the SR states any proposals for undergrounding will include consideration and appraisal of the likely significant effects and further consultation. PEDW recommends the Applicant consults with the relevant stakeholders including the 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.
ID.3	Chapter 3	Alternatives	PEDW welcomes that the 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. Carmarthenshire County Council (CC) include in their comments that alternatives need to include a route that is suitable for undergrounding. This needs to be assessed and a full justification made if this option is discounted. They add that OHL are proposed along the preferred route that may well be

ID	Reference in Scoping Report	Issue	Comment
			unsuitable for undergrounding, however an alternative route may be acceptable for undergrounding and should be included in the list of options. PEDW advises that 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.
Applicant's aspects proposed to be scoped out			
ID.4	5.9 – 5.28	Climate	The SR has considered impact on Climate in relation to two factors: Greenhouse gas emissions (GHG) and impacts relevant to adaptation as set out in paragraph 4 of Schedule 4 to the EIA Regulations. PEDW agrees that Climate does not require a standalone chapter as related impacts will be considered in other chapters. Climate is therefore scoped in to the ES, but not as a standalone chapter.
ID.5	5.26 – 5.28	Population and Human Health	Carmarthenshire CC do not agree that Human Health can be scoped out of the SR due to the potential significant impact of electricity transfer in close proximity to individuals along the route, this is addressed in the Electric and Magnetic fields section below. They include in their comments that the potential impact incurred during construction can be sufficiently assessed in other appropriate chapters of the ES. PEDW agrees with the approach set out in the SR. Population and Human Health does not require a standalone chapter as it will be addressed in the appropriate chapters of the ES. Population and Human Health is therefore scoped in to the ES, but not as a standalone chapter.

ID	Reference in Scoping Report	Issue	Comment
ID.6	5.29 – 5.33	Socio-economics	The applicant's attention is drawn to comments from Ceredigion CC regarding socio-economic impacts, in particular in relation to tourism. PEDW notes the SR states that aspects of socio-economics, including tourist visitors, would be addressed in other chapters of the ES such as Traffic and Movement, Landscape and Visual Impact, Noise and Vibration, and Air Quality. PEDW agrees that this topic 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.7	5.43 – 5.50	Major accidents and disasters	The applicant's attention is drawn to comments from HSE regarding areas of the proposed development that fall within HSE public safety consultation zones associated with Major Accident Hazard Pipelines. PEDW welcomes the approach set out in the SR to apply a comprehensive risk management framework during construction and operation and agrees that this topic can be scoped out.
ID.8	5.51 – 5.56	Electric and magnetic fields (EMF)	PEDW notes that the SR states that EMF is proposed to be scoped out of the ES as exposure on the ground is within the required safety limit set by Energy Networks Association (2012). Carmarthenshire CC, however, disagree that this topic can be scoped out of the ES due to concerns regarding health impacts and impact on mobile broadband and satellite signal. In a recent scoping direction submission for an OHL by Green GEN, it was proposed that a separate document would be provided alongside the ES with all the relevant information on EMF and how the proposed development will comply with relevant guidelines and codes of practice. PEDW considers this to be the most appropriate approach and provided that it is demonstrated that EMF exposure is within the required safety limits, PEDW agrees that a chapter on EMF can be scoped out of the ES.

ID	Reference in Scoping Report	Issue	Comment
			The applicant should continue to liaise with relevant consultees regarding EMF for other species, as noted in the ecology chapter below. This impact will need to be addressed in the ES, within the ecology chapter.
ID.9	5.57 – 5.59	Decommissioning	The applicant's attention is also drawn to comments from Ceredigion CC regarding decommissioning, highlighting that given the potential environmental impacts relating to decommissioning, and the emphasis and expectations national and local policy place on decommissioning, this should be scoped in. The SR states that when the operational life of the proposed scheme ends, it is possible that the infrastructure be re-equipped and refurbished, however, the OHL may also be fully decommissioned. 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, 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.
ID.10	5.34 – 5.42	Material assets	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 Construction Environmental Management Plan (CEMP) should 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.

ID	Reference in Scoping Report	Issue	Comment
Landscape and Visual			
ID.11	6.2 – 6.7	Study area	The Applicant's attention is drawn to comments from Carmarthenshire CC, who consider the proposed study area acceptable, but request the wider consideration of the initial 5 km study area be fully enacted and additional sensitive receptors and viewpoints in locations where topography allows visibility beyond the provisional study area should be included. The LPA request the final Landscape and Visual Impact Assessment (LVIA) Study area be agreed with them prior to commencement of any landscape and visual assessment. NRW highlights that the height of structures within the proposed 132 kV substation is not clear within the SR. Both NRW and Ceredigion CC add that for vertical structures between 26 m to 49 m the recommended search area is 4-8 km and the recommended study area is 2-5 km. NRW adds that although individual pylons would be 27 m tall, they advise that the scale of the overall transmission corridor is such that a pre-cautionary approach should be used. If significant impacts are identified within 5 km of the project, then the final study area should reflect this. PEDW welcomes the SR states that the applicant will hold discussions with both LPAs and NRW regarding the detail of the LVIA.
ID.12	6.14	Viewpoints	NRW states the LPAs are best placed to advise on specific local viewpoints, but as a general principle they recommend viewpoints are included which represent different perspectives, including where available, elevated views over the OHL corridor.

ID	Reference in Scoping Report	Issue	Comment
			Carmarthenshire CC requests the final schedule of viewpoints is agreed through consultation. PEDW welcomes the SR states the location of viewpoints will be agreed through further consultation with statutory consultees.
ID.13		Figures	NRW advises that the LVIA figures should include a shaded topographical relief map to illustrate the relationship between the OHL route and landform, presented at a legible scale, no smaller than the 5 layout sheets (A-E).
ID.14	6.8 – 6.12 / 6.16 – 6.30	Baseline data sources	Carmarthenshire CC considers the data sources set out are generally appropriate for baseline data. The applicant's attention is drawn to their request that a proposed methodology for consideration of the settlements / groupings of properties within the extensive linear study area be developed for use within the LVIA, adding they can provide data sources for LDP based settlement types as a basis for development of an agreed methodology. The applicant's attention is drawn to comments from NRW, highlighting a number of additional data sources which should also be considered.
ID.15	6.13 – 6.15	Surveys	Carmarthenshire CC considers the scope of the proposed survey approach appropriate. NRW in their comments assume that, although not included in the SR, wintertime photography will be included in the LVIA given the period of time over which the site survey work will be undertaken. For the avoidance of doubt, NRW advises winter viewpoint photography should be included in the LVIA.
ID.16	6.22 – 6.30	Landscape characters	Ceredigion CC welcome the Dyffryn Teifi and Cambrian Mountains National Landscape Areas (NLCA) will be considered, but add the Ceredigion NCLA should also be included as the Zone of Theoretical Visibility (ZTV) falls within this NLCA.

ID	Reference in Scoping Report	Issue	Comment
			NRW highlights that it is not clear from the SR what landscape units will be used for assessment purposes within the LVIA. NRW advises local level character areas is likely to be the most useful and appropriate method, to delineate and describe local landscape character areas for assessment purposes based on site survey and existing evidence within National Landscape Character Area descriptions, LANDMAP, and local authority level assessments.
ID.17	6.18 - 6.21	Special Landscape Areas (SLA)	The applicant's attention is drawn to comments from Carmarthenshire CC stating that if the existing SLA classification is removed as part of the new Local Development Plan (LDP), then the Landscape Character Assessment should provide the basis for the assessment of impacts to Landscape Character and provide a more robust baseline in terms of identifying landscape characteristics and landscape value. NRW adds that if the classification is removed, it is not because the landscape no longer has high value. The most important matter is for the LVIA to identify what aspects are valued and why, and how, and to what extent these would be affected by the proposed development. Ceredigion CC highlights that the proposed development would also be located within the Teifi Valley SLA and that specific reference is made in the adopted SLA Supplementary Planning Guidance (SPG) about the potential cumulative impact that energy developments may have on the area's landscape. The SPG should be considered when establishing the area's baseline characteristics and the assessment should consider the scale and nature of the development and its ability to be accommodated without significant damage to, and where possible enhancement of, the characteristics of the SLA.
ID.18	Table 6.3	National Parks and National Landscapes	NRW states that at the distances of the OHL from Bannau Brycheiniog National Park (BBNP – 18 km at closest point) and the Gower National Landscape (15

ID	Reference in Scoping Report	Issue	Comment
			km at its closest point), the proposals are not expected to result in any impacts on either designated landscape.
ID.19	Table 6.2	Receptors scoped in	NRW states that if following detailed investigations, significant impacts are identified beyond 3 km (within the wider 5km search area) then these receptors should be scoped in. Ceredigion CC advises that in addition to trunk roads, principle roads, Public Right of Way (PRoW), National Cycle Networks and designated areas, any settlements named within the LDP which fall within the ZTV should be considered. The applicant's attention is drawn to comments from Carmarthenshire CC advising on additional receptors to be included. The new Tywi Valley Path Cycleway route, expected to commence later in 2024, will pass through the study area and receptors using this route should be included within LVIA. Carmarthenshire CC also highlights the road network within the study area provides links between sections of the formal PRoW network and requests these users be considered as highly sensitive receptors. Carmarthenshire CC further states that regarding sites with extant planning permission, the status of potential future receptors and appropriate LVIA methodology should be fully considered. Carmarthenshire CC requests final agreement is sought from them prior to commencement of any landscape and visual assessment. PEDW welcomes the SR states that the applicant will hold discussions with both LPAs and NRW regarding the detail of the LVIA.

ID	Reference in Scoping Report	Issue	Comment
ID.20	Table 6.3	Receptors scoped out	Carmarthenshire CC generally concurs with the receptors scoped out, however the applicant's attention is drawn to their comments highlighting contradictions in the justifications compared with other areas of the scoping report. They advise the approach of the initial 5 km study area is used to establish thresholds for scoping out receptors.
ID.21	6.53	Assessing operational effects based upon the worst-case scenario at year 1 only	Carmarthenshire CC assumes this implies that the increased future screening effects of growing vegetation would not be considered within the assessments. They state that in general the worst-case scenario approach to assessment is acceptable, but at this stage it is not clear whether offsite planting may be required as mitigation and this should be kept as an option pending the LVIA outcome. NRW states that if no mitigation planting is proposed, there is unlikely to be any material difference between the impacts in Year 1 and later years and therefore the Year 1 assessment would suffice. They add that the differences in impact between summer and winter months should be considered.
ID.22	6.70	Residential Visual Amenity Assessment (RVAA)	Carmarthenshire CC considers the 150 m search area for the RVAA to be premature and states that this should be subject to robust appraisal, taking account of specific impacts of relative elevations and in combination and in succession effects. They request the study area is agreed with the LPA prior to commencement of the RVAA. Ceredigion CC highlight that in accordance with Policy 18 of Future Wales, there should be no unacceptable adverse visual impacts on nearby communities and individual dwellings. Therefore, the incorporation of isolated individual dwellings, or small groups of dwellings, as receptors would be welcomed.

ID	Reference in Scoping Report	Issue	Comment
			PEDW recommends the applicant liaises directly with both LPAs regarding the requirements for the RVAA, ensuring this is appropriately addressed in the ES.
ID.23	Table 6.2	Cumulative effects	NRW and Carmarthenshire CC advise that cumulative landscape and visual impacts with the proposed Towy-Usk connection route (specifically at the southern end of the proposed Towy-Teifi connection route) should be fully addressed as part of assessment. The LPA adds that the cumulative assessment methodology should fully address the range of potential visual impacts including those arising from effects in combination and in succession. They request the methodology and cumulative developments to be assessed are agreed with consultees. PEDW recommends the applicant liaises directly with the LPAs and NRW regarding the cumulative LVIA, ensuring a robust rationale for any agreed approach is included in the ES. PEDW notes the SR in table 6.2 states that existing OHL structures form part of the baseline environment will therefore be considered as part of the LVIA, but not the cumulative LVIA. PEDW would 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.
ID.24	6.67	Mitigation	NRW states the initial LVIA should identify any opportunities where mitigation planting would be effective, as well as opportunities for offsetting the impacts of the proposal where planting and other forms of mitigation are unlikely to be effective. Where mitigation planting is proposed, the assessment should consider its longer-term impact, both in winter and summer months.

ID	Reference in Scoping Report	Issue	Comment
			NRW also notes that undergrounding will be considered in the most sensitive landscape areas or where OHL will be particularly impactful upon visual receptors. NRW encourages these areas / receptors are identified at the earliest opportunity in consultation with stakeholders and adds that sensitive areas will include those sections which align through the Teifi and Tywi Valleys. PEDW draws the applicant's attention to the comments above regarding underground cabling infrastructure.
Biodiversity			
ID.25	7.2	Consultees	NRW advises the local ecology county recorders are also consulted.
ID.26	7.7 – 7.9	Data sources	NRW advises that a full data request must be applied for from West Wales Biodiversity Information Centre.
ID.27	7.28 – 7.33 / Appendix 7.1	Protected sites	The applicant's attention is drawn to comments from NRW advising that impacts to all the notified features of these sites are considered. NRW also highlight that the maps within the scoping report do not show the Special Area of Conservation (SAC) and the Site of Special Scientific Interest (SSSI) rivers as priority habitat and advises that these are updated. They also add that the River Tywi SAC is not identified as a SAC in the Biodiversity maps.
ID.28		Local Biodiversity Interests	The applicant's attention is drawn to comments from NRW relating to biodiversity, recommending that the applicant consults the LPAs 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	Reference in Scoping Report	Issue	Comment
ID.29	7.10 – 7.11	Habitat and Protected Species Surveys	NRW also states that up to date survey information should be included in the ES and advises that the full details are provided as an appendix to the ES. The applicant's attention is drawn to comments from NRW regarding the Phase 1 habitat surveys, recommending these are undertaken during the summer. PEDW highlights that although the 1990 guidelines are quoted in NRW's response, NRW have previously confirmed they endorse the Handbook for Phase 1 habitat survey – a technique for environmental audit (2010, JNCC) as an appropriate standard. The applicant's attention is also drawn to comments from NRW advising an assessment is undertaken to determine the likelihood of protected species being present and likely to be affected by the proposals. They state targeted species surveys should be undertaken for all species scoped in. NRW also advises that lower plant surveys are carried out in areas where habitat is suitable and the proposal will impact. PEDW recommends the applicant liaises directly with NRW on the requirement for and outcome of these surveys, ensuring that the agreed approach is clearly outlined in the ES.
ID.30	7.11	Protected Species	NRW highlights that, should protected species be confirmed, 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. NRW also advises that comprehensive descriptions of the habitats affected are included to support robust conclusions about their significance for the species.

ID	Reference in Scoping Report	Issue	Comment
ID.31		Habitat connectivity	NRW advises that where European Protected Species and / or nationally fully protected species are present, the development maintains habitat connectivity across the route of the cables, particularly if / where undergrounding cables proves necessary.
ID.32	7.12 – 7.19	Bats	The applicant's attention is drawn to comments from NRW in relation to bats. NRW advises that the proposed surveys are used to determine the need for further surveys, especially of rare woodland bats. They add that should bat roosts subsequently be suspected or confirmed, an assessment of the impacts of the scheme on those roost sites is included in the ES, as well as proposals to retain, mitigate and / or compensate for them. NRW would expect that important features for bats would be retained and their function for bats protected. NRW further advises that once the refined route is known, detailed assessment of trees along the identified corridor will be required. They also highlight the guidance which all surveys should be undertaken in accordance with. PEDW recommends the applicant liaises directly with NRW and the LPAs' Ecologists following the survey results to agree whether additional surveys and mitigation in relation to bats will be required and PEDW advises the outcome is clearly outlined in the ES.
ID.33	7.35 – 7.36	Bats – mitigation	NRW advises that measures to maintain flight connectivity for bats during and after construction are included in the ES, regardless of whether potential flight corridors have been surveyed for these species.
ID.34	7.20	Great Crested Newts (GCN)	NRW notes that Habitat Suitability Index and Environmental DNA surveys will be undertaken of ponds within 500 m, but highlight clarity needs to be provided on 500 m from what area. NRW welcomes the approach on additional surveys to be undertaken where surveys indicate GCN are present. They advise that the

ID	Reference in Scoping Report	Issue	Comment
			results of GCN surveys and appropriate avoidance / mitigation / compensation proposals as necessary form a part of the ES.
ID.35	Table 7-2 / 7.11	Dormouse, otter, red squirrel, pine marten	NRW notes these species are scoped in for the assessment during the construction phase, but state that no information is provided on the intended survey effort. NRW advises that all surveys are undertaken following best practice guidance where this exists. With respect to otter, NRW advises that surveys include an assessment of the potential of habitats to be used as natal sites. NRW recommends the results of all surveys along with any avoidance / mitigation / compensation proposals as necessary, form a part of the ES submission. NRW advises that the ES include a full description of measures to minimise habitat loss and fragmentation during construction and operation for all protected species affected by the proposed development. PEDW welcomes the SR states that the exact scope and in some cases methodology of protected species surveys will be confirmed following the Phase 1 habitat survey and where necessary consultation with NRW and other relevant stakeholders will be undertaken. PEDW recommends the applicant liaises directly with NRW and both LPAs on the required survey effort for these species, ensuring this is appropriately addressed in the ES.
ID.36	7.21 – 7.23	Ornithology Surveys	The applicant's attention is drawn to comments from NRW highlighting these surveys should be in line with industry best practice and species-specific surveys may also be required. These should be informed by the habitat on site as well as the results of any desktop survey. Methods can be species specific and may require different timings.

ID	Reference in Scoping Report	Issue	Comment
			NRW highlights that as they are not in receipt any detailed survey information, they are unable to provide an exhaustive list of the species-specific surveys expected to be included within the ES. The applicant's attention is drawn to the requirements stated in NRW's response where surveys for barn owls are needed. PEDW recommends the applicant liaises directly with NRW and the LPAs' Ecologists on species-specific surveys to be included in the ES. Any departure from the advice provided should be supported by a robust rationale in the ES.
ID.37	7.56 – 7.57	Ornithology – species importance	The applicant's attention is drawn to comments from NRW regarding determining the importance of species and populations identified from surveys, highlighting these should refer to Wales specific resources where practical and providing sources where relevant population estimates can be found. NRW adds that reference should be made to Birds of Conservation Concern Wales 4 (BoCCW4) as well as listing on Section 7 of the Environment Act (Wales) 2016, and Schedule 1 of the Wildlife & Countryside Act 1981 (as amended).
ID.38	7.44 – 7.47	Ornithology – mitigation	NRW highlights that additional mitigation may be required depending on the results of the suite of bird surveys. The applicant's attention is drawn to NRW's comments stating details of appropriate mitigation or compensation for any impacts identified should be provided along with appropriate enhancements. They add that mitigation may need to take the form of curtailment or redirection of activities during particular times of year and highlight that in relation to buffer distances reference should be made to Goodship & Furness 2022 or alternative published references for species not listed there. PEDW welcomes the SR states a Bird Protection Plan will be prepared, to be incorporated into the Construction Environmental Management Plan (CEMP). This should be included as an Annex to the ES. PEDW recommends the

ID	Reference in Scoping Report	Issue	Comment
			applicant liaises directly with NRW and the LPAs' Ecologists regarding any required mitigation, following completion of the bird surveys.
ID.39	7.24	Arboriculture	Ceredigion CC notes that proposed corridor route includes several areas of ancient woodland, a number of priority habitats and identified forestry on the National Forest Inventory 2020. They state that the approach to arboriculture outlined in the SR will ensure these features are considered and appropriate mitigation measures are implemented. PEDW welcomes that an Arboricultural Impact Assessment and Arboricultural Method Statement will be prepared and recommends these are included as appendices to the ES.
ID.40	Tabel 7-1 / Table 7-3	Fish and invertebrates	The applicant's attention is drawn to comments from NRW regarding fish. They advise that diadromous fish are mobile receptors for the Cardigan Bay and Estuaries SAC and therefore should be included in Table 7-1 of designated sites within or functionally linked to the study area. NRW does not agree that fish species and invertebrates can be scoped out as some of these species are features of the SAC and SSSI. NRW advises that fish remain scoped in for the construction phase until further detail can be provided on how the cables will cross river crossings. Depending on the method for the individual river crossings, NRW advises that additional mitigation may be required, for example if open-cut techniques were being used. PEDW agrees with these comments, currently there is insufficient information available to support scoping out these species and fish and invertebrates are therefore scoped in during the construction phase. PEDW recommends the applicant liaises directly with NRW once further detail is available, ensuring impacts on fish and invertebrates and any required

ID	Reference in Scoping Report	Issue	Comment
			mitigation is appropriately addressed in the ES. If, further to discussions with NRW, these effects can be scoped out, a robust rationale for this should be provided in the ES.
ID.41		Electromagnetic fields (EMF)	Whilst the SR considers EMF with regard to human health, there does not appear to be an assessment of EMF on ecology. Further information is required on the applicant's proposed approach to this matter. This should be fully detailed in the ES with full justification if this is to be scoped out. At this stage, inadequate information has been provided to scope out this impact, therefore EMF in relation to ecology during operation is scoped in to the ES in a proportionate manner.
ID.42	7.53 – 7.61	Impact assessment	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.43		Mitigation / Compensation	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. The applicant's attention is drawn to comments from Carmarthenshire CC regarding ensuring the best overground or underground route is chosen avoiding ecologically sensitive areas and developing a detailed mitigation plan.

ID	Reference in Scoping Report	Issue	Comment
Cultural Heritage			
ID.44	8.3 – 8.5	Study Area	The SR states that the study area is the area that will be directly, physically affected by the proposed scheme plus a 3 km radius from the proposed scheme for historic assets and a 1 km radius for non-designated historic assets. Cadw and Carmarthenshire CC agree that this is appropriate. Cadw also includes in their comments that all the relevant receptors, assets and resources are included in the SR.
ID.45	8.12 – 8.15	Surveys	Carmarthenshire CC confirms that the surveys are considered appropriate and that Heneb would expect to see and approve a Written Scheme of Investigation for any such work in advance. Cadw states in their comments that the geophysical survey may identify anomalies that will require archaeological evaluation to determine their significance. They also note that the evaluation work will need to be carried out prior to the completion of the EIA. In regards to the ASIDOHL2 assessment set out in the SR, Cadw highlights that they should be consulted on this to determine the historic landscape character areas that will be included in the study. PEDW recommends the applicant liaises directly with Cadw on this assessment. In Cadw's comments they make reference to the "The Setting of Historic Assets in Wales" document, which is the guidance that the setting of the designated heritage assets should be carried out in accordance with. They add that a stage 1 assessment is expected to be carried out for all 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 to the ES.

ID	Reference in Scoping Report	Issue	Comment
ID.46	8.35	Guidance	In response to the applicant's question regarding any other supplementary guidance of relevance to the assessment, Carmarthenshire CC highlights their Supplementary Planning Guidance: Archaeology and Development. Cadw advises that The Historic Environment (Wales) Act 2023 will be enacted before the EIA is produced. This will replace The Ancient Monuments and Archaeological Areas Act 1979; The Historic Environment (Wales) Act 2016 and The Planning (Listed Building and Conservation Areas) Act 1990. The enactment of the Act will also lead to revisions to Technical Advice Note 24: The Historic Environment 2017 and other guidance notes.
ID.47		Lampeter Conservation Area	Ceredigion CC notes effects relating to the change of the setting of historic assets during the operational period are proposed to be scoped in. They highlight that therefore consideration of the setting of the Lampeter Conservation Area would be supported. The LPA explains it is in the process of preparing a Conservation Area Appraisal for Lampeter and the applicant should have regard to this when determining the baseline situation.
ID.48	8.1 – 8.2	Consultees	Carmarthenshire CC's and Cadw's responses highlight the County Conservation Officers and Built Heritage Officers should also be consulted, on the effect on the settings of listed buildings. Cadw adds that the archaeological planning services of the Heneb: The Trust for Welsh Archaeology should be consulted on the non-designated archaeological assets.
Air			
ID.49	9.21	Guidance	Ceredigion CC highlights that in 2023, the Welsh Government consulted on an updated Technical Advice Note 11 (TAN 11) which address air quality, noise and soundscapes. It is proposed that this would replace the existing TAN 11 which currently focuses on noise. The LPA states that whilst outcomes of the consultation are still awaited, it may be prudent to have consideration of the potential change in national guidance.

ID	Reference in Scoping Report	Issue	Comment
ID.50	9.19	Protected sites	NRW highlights that they are unable to provide any advice on air quality impact until further information and assessments are made on the potential impacts on the nearby protected sites and their features. PEDW recommends the applicant liaises directly with NRW and both LPAs regarding the methodology and outcome of the Air Quality Impact Assessment, agreeing aspects to be scoped in. If following these discussions it is agreed certain aspects can be scoped out, a robust rationale for this should be provided in the ES.
Noise and Vibration			
ID.51	10.16 - 10.17 / table 10-2	Operational noise	Ceredigion CC notes noise during the operational phase is proposed to be scoped out, with the applicant seeking to avoid placing infrastructure next to sensitive receptors where possible. The LPA states that where this is not possible, the noise implications on nearby sensitive receptors as should be considered as the SR notes there may be noise in wet conditions.
ID.52		Soundscape	The applicant's attention is drawn to comments from Ceredigion CC highlighting that there should be consideration of the soundscape of historically important receptors in the area and the potential impact of the development on these.
Traffic and Movement			
ID.53	11.1 – 11.5	Traffic Statement	Ceredigion CC states further details should be provided in a Transport Statement, considering the increased traffic trip the likely impact of large construction / delivery vehicles on the minor County Road network. They add details of any required mitigation measures should be included. PEDW welcomes the SR states a Traffic and Movement Assessment will be prepared and that Local and National Highways Authorities will be key consultees for this. This should be included as an appendix to the ES.

ID	Reference in Scoping Report	Issue	Comment
ID.54	11.19	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. The applicant's attention is drawn to comments from Ceredigion CC regarding detail to be included in the CTMP.
ID.55	2.57	Abnormal Indivisible Loads (AIL)	The applicant's attention is drawn to comments from Welsh Government Transport Directorate, requesting further detail in relation to transporting AIL to the proposed site and highlighting key points from their attached draft version of the "Pulling Together" – Best Practice for Transporting Abnormal Loads in Wales" Procedures and Advice Guidance document. PEDW recommends the applicant liaises directly with Welsh Government Transport Directorate on the draft abnormal load notifications.
ID.56	11.23	Trunk Road Network	The applicant's attention is drawn to comments from Welsh Government Transport Directorate regarding details and agreement required for construction works which impact the operation of the trunk road, in particular the routing of cables across the road. This includes full method statements and risk assessments and a Road Safety Audit.
ID.57	11.30	Highways	The applicant's attention is drawn to comments from Carmarthenshire Highways Authority noting the preferred route presents several interactions with essential highway infrastructure. The Authority highlights a detailed appraisal of the potential impacts of both non-operational and operational phases, and the pylon routing will be required at time of application. Once further detail is available to allow them to undertake a comprehensive assessment, they will be able to comment on the proposed scope for the traffic and transport element of the project, the proposed field survey methodology and matters to be scoped in and out. The Authority refers to the response from Welsh Government's Transport Directorate regarding the detail required for the submission.

ID	Reference in Scoping Report	Issue	Comment
			PEDW notes Carmarthenshire Highway Authority states this detailed appraisal is required for both non-operational and operational phases. However, the SR proposes to scope out the operational phase. As operational traffic would be limited to routine maintenance and inspection activities, PEDW is content this phase can be scoped out. PEDW recommends the applicant liaises directly with both Highways Authorities and Welsh Government's Transport Directorate once further detail is available, to ensure Traffic and Movement is adequately assessed and proportionately addressed in the ES.
Geology and Hydrology			
ID.58	12.3 / 12.8	Study area and surveys	Carmarthenshire CC confirms they consider the study area and proposed surveys to be appropriate.
ID.59	12.4 – 12.5	Data sources	The applicant's attention is drawn to comments from Carmarthenshire CC highlighting further data sources to those listed in the SR, including in relation to mineral safeguarding areas.
ID.60	12.10	Mineral sites	Carmarthenshire CC advises the applicant takes into consideration dormant mineral sites, which albeit are not active sites, do have extant planning permission for mineral winning and working.
ID.61	12.11 / Table 12-1	Mineral safeguarding	Both Carmarthenshire and Ceredigion LPAs support that the SR scopes in mineral safeguarding. The applicant's attention is drawn to comments from Carmarthenshire CC highlighting the proposal should address the requirements of the policies contained within Planning Policy Wales, MTAN and the LDP on mineral safeguarding and how the development could impact on reserves and future

ID	Reference in Scoping Report	Issue	Comment
			resources. Ceredigion CC also highlights the applicant should have regard to the policy considerations for safeguarding in their LDP.
ID.62	12.10 -12.11/ 12.36 / Table 12-2	Mining and quarrying	Carmarthenshire CC notes three areas of likely historical metalliferous mining have been scoped out. They however add that the SR has not considered other mineral winning and working, including aggregates (sand and gravel, sandstone etc), building / dimension stone, and borrow pits. They note mining and quarrying (including historic) has not been included in the scope and add this should be scoped in. PEDW notes the SR at paragraph 12.11 acknowledges the study area crosses several mineral safeguarding areas, including Aggregates Safeguarding Areas. The SR states that mineral safeguarding is scoped in as there currently is insufficient information further consultation is required. PEDW recommends the applicant liaises directly with Carmarthenshire CC to ensure their requirements regarding the scope in relation to mining and quarrying are appropriately addressed in the ES. If it is subsequently agreed that this aspect can be Scoped Out, a rationale should be included in the ES.
ID.63	12.31	Hydrogeological and geotechnical site investigation	NRW in their response seeks confirmation that the site investigation intrusive locations correspond exactly to where the 208 towers and their piles will be located. They also query whether each tower location would comprise a minimum of 4 piles for each tower. PEDW recommends the applicant liaises directly with NRW to provide the required clarification, ensuring these matters are appropriately addressed in the ES.
ID.64	12.28 / 12.32	Contamination	The applicant's attention is drawn to comments from NRW querying micro-siting provisions in relation to avoiding localised contamination (soils and / or

ID	Reference in Scoping Report	Issue	Comment
			groundwater). If locations are fixed and some degree of contamination is encountered, the nature of it would need to be assessed and discussed with the local authority to find the best way forward. NRW adds that bespoke piling risk assessments may be required as indicated in the SR. NRW state this risk could probably be captured within a CEMP. They add that as unsuspected contamination can potentially be encountered at any type of development site or along the route of a linear infrastructure project, they may require an 'Unsuspected Contamination Condition' be included in any planning permission granted. PEDW recommends the applicant liaises directly with NRW on this matter, ensuring it is appropriately addressed in the ES. PEDW welcomes the SR states that where potential contaminated land is recorded, a remediation / risk management strategy will be produced and implemented, detailing the proposed measures required to ensure that the proposed scheme does not impact sensitive receptors including human health, groundwater and the wider environment. PEDW also welcomes the SR states a CEMP will be prepared and recommends this addresses contamination. PEDW recommends the CEMP, and contamination risk management strategy if produced, are included as appendices to the ES.
ID.65	12.36 / Table 12-2	Peat	PEDW notes the SR states peat is scoped out at construction and operation phases. NRW disagrees that peat should be scoped out. NRW states a baseline assessment and impact assessment, including peat depth, should be included.

ID	Reference in Scoping Report	Issue	Comment
			The applicant's attention is also drawn to comments from LQAS regarding peatland, highlighting development and loss of peatland is contrary to Chapter 6 of PPW. They state peat impacts must be scoped in at this stage. PEDW agrees that peat should be scoped in and recommends the applicant liaises directly with NRW and LQAS to ensure these impacts are appropriately assessed and addressed in the ES.
ID.66	12.4	Peat – data sources	LQAS welcomes the SR states the aim is to avoid peatlands and that information to locate peatland locations and extent has been considered. They highlight that the Peatland for Wales Map now supersedes the Unified Peat Map and add that the Evidence Layer on the Peatlands of Wales map should also be used as an evidence source.
ID.67		Peat - surveys	LQAS would welcome that as the design progresses, suitable peat surveys are undertaken and findings used to inform the design. PEDW recommends the applicant liaises directly with LQAS regarding the requirements for and outcomes of peat surveys, ensuring this is appropriately addressed in the ES.
ID.68		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.

ID	Reference in Scoping Report	Issue	Comment
Land and Soil			
ID.69	13.7 – 13.8 / 13.23	Agricultural Land Classification (ALC)	In their response 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. 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. PEDW welcomes the SR states LQAS will be consulted prior to surveys commencing with respect to the proposed survey methodology. PEDW also welcomes a factual survey report will form an appendix to the ES.
ID.70	13.4 / table 13-2	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. LQAS confirms BMV agricultural land should be scoped in and PEDW welcomes the SR states loss of agricultural land is scoped in.
ID.71	13.15	Soil Resources Management Plan (SRMP)	LQAS welcomes that an SRMP will be developed and based on survey evidence and good practice guidance. The applicant's attention is drawn to their comments regarding the requirements for the SRMP. PEDW recommends the SRMP is included as an appendix to the SR.
ID.72	Table 13-3	Soils	The SR proposes to scope out soils due to the measures proposed in the CEMP and SRMP. LQAS highlights that impacts on soil during construction must be scoped in to the assessment.

ID	Reference in Scoping Report	Issue	Comment
			As mitigation is being relied upon to prevent a likely significant effect during construction, PEDW confirms that soils should be scoped in to the ES in a proportionate manner , with the CEMP and SRMP included as a technical appendices to the ES.
Water			
ID.73	14.9 / 14.55	Surveys	NRW is unclear regarding the applicant's question whether targeted site inspection of Main Rivers that will be crossed by the proposed scheme are sufficient to establish the baseline. However, they consider any decision on further inspection or monitoring requirements would be dependent on the outcome of the targeted site inspection. PEDW recommends the applicant liaises directly with NRW to clarify this question and to confirm their views on the matter, ensuring this is clearly addressed in the ES. Any departure from the advice provided by NRW should be supported by a robust rationale in the ES.
ID.74	14.2 / 14.8 / 14.26	Flood Risk	In their comments NRW confirms that they support the approach to produce a standalone Flood Consequences Assessment (FCA). They add that they would expect the FCA to assess the risk and consequences of flooding on the development and the risk and consequences (i.e. overall impacts) of the development on flood risk elsewhere. The FCA must also consider NRW's ability to access, maintain and impact their Flood Risk Management assets. NRW also comments that they would appreciate and encourage early engagement with the Development Flood Risk team regarding the potential requirement for Flood Risk Activity Permits. This is dependent on location of particular infrastructure elements and the effect they may have on the main river.

ID	Reference in Scoping Report	Issue	Comment
			NRW further highlights that they have not been provided with the location, lengths or total area of access tracks and bases, in relation to quantifying potential runoff to assess if flood risk is increased to any nearby properties and land. Similarly, they would require more detail in relation to the hardstanding for the new substation. They also highlight that this is a matter for the Lead Local Flood Authority and SuDS Approval Body within the relevant local authority and recommend they are contacted. PEDW welcome the SR states NRW and both LPAs will be consulted on flood related matters.
ID.75	Table 7.1 / 14.24	Water Quality	NRW advises that Cardigan Bay SAC and the West Wales Marine SAC is included in addition to the Carmarthen Bay and Estuaries SAC for consideration of potential impacts of pollution. The applicant's attention is drawn to NRW's comments where they highlight the guidance that should be referred to on best practice for the CEMP. NRW confirms that the data sources proposed for assessment of marine water quality are appropriate.
ID.76	14.32 – 14.35	Water Framework Directive (WFD)	NRW advises that in assessing compliance with the WFD regulations, the applicant should include an assessment of impacts of the decommissioning phase of the proposed works. If the assumption is being made that the works for decommissioning will mirror those for the construction, this must be stated explicitly in the WFD compliance assessment.
ID.77	14.31 / 14.53	Likely significant effects	NRW states that they support the general approach of assessing the worst-case scenario for likely significant effects and assessing, designing and planning accordingly, and specifically scoping in the potential transfer of sediment and

ID	Reference in Scoping Report	Issue	Comment
			pollutants to main river SACs and their Main River tributaries. They advise that this approach is applied to hydrologically and / or ecologically linked SACs such as the Carmarthenshire Bay and Estuaries SAC, Cardigan Bay SAC and the West Wales Marine SAC. NRW highlights that a marine licence may be required for works near Carmarthen as the works extend beyond the Mean High-Water Line.
ID.78	Table 14-3	Potential increase in flood risk due to construction or upgrade of bridges for access over watercourses	NRW notes the 'potential increase in flood risk due to construction or upgrade of bridges for access over watercourses' has been scoped out. They query what evidence there is that the design of the bridges will ensure flows are maintained and whether any blockage scenarios have been assessed. Given NRW's comments, it is not possible to scope out this effect at this stage and the potential increase in flood risk due to construction or upgrade of bridges for access over watercourses is therefore scoped in. PEDW recommends the applicant liaises directly with NRW on this matter and if following assessment and discussion it is agreed this effect can be scoped out, a robust rationale for this should be provided in the ES.
ID.79	Table 14-3	Potential transfer of sediment and pollutants to Ordinary Watercourses	NWR considers that ordinary watercourses should have a baseline assessment and impact assessment for sediment and other pollutants and therefore do not agree to this receptor being scoped out. Given NRW's comments, it is not possible to scope out this effect at this stage and potential transfer of sediment and pollutants to Ordinary Watercourses is therefore scoped in. PEDW recommends the applicant liaises directly with NRW on this matter and if following assessment and discussion it is agreed this effect can be scoped out, a robust rationale for this should be provided in the ES.

ID	Reference in Scoping Report	Issue	Comment
ID.80	14.55	Essential Infrastructure	The applicant's attention is drawn to comments from NRW regarding the SR referring to the proposed infrastructure as 'essential infrastructure'. They believe this would instead be classed as 'less vulnerable development' in line with TAN15. PEDW recommends the applicant liaises directly with NRW and the LPA on this matter to ensure it is appropriately referenced in the ES.
ID.81		Asset Protection	The Applicant's attention is drawn to DCWW's comments highlighting that a 3 m easement either side of the centreline of their apparatus will be required to allow continued access, as well as conditions for development near watermains. They add that should the proposed development be located within the protection zones of the sewer or watermain crossings there would be a requirement to apply to divert the public sewer or watermain. Grid references for the apparatus are included in their comments in Appendix 1.
Cumulative Effects			
ID.82			The applicant's attention is drawn to the comments above in the Landscape and Visual section, regarding the LPAs' and NRW's comments in relation to cumulative effects. PEDW recommends the applicant liaises directly with these stakeholders to agree the approach to the cumulative assessment, which should be clearly outlined in the ES.
ID.83	15.13 / 15.18		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. PEDW therefore welcomes the SR states it is recognised that the LPAs may be aware of additional proposals and PEDW recommends the schedule of cumulative schemes to be included in the assessment is agreed in consultation with the LPAs and other relevant consultees.

ID	Reference in Scoping Report	Issue	Comment
			The applicant's attention is drawn to comments from Carmarthenshire CC highlighting a number of other renewable schemes and pylons to be included in the assessment. They also state that a suitable underground route should be considered as an option for assessment. 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.
Other Considerations			
ID.84		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.

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]@carmarthenshire.gov.uk>
Sent: Wednesday, June 26, 2024 4:57 PM
To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>; Helen Rice
Cc: Rhodri D Griffiths; Hugh Towns **Subject:** RE: EIA Scoping Direction Consultation for DNS CAS-03094-T7D9G0 - Green GEN Towy Teifi Grid Connection

Dear PEDW,

Please see attached LPA response to your scoping consultation.

If you have any queries please do not hesitate to contact me.

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.

PEDW Reference: CAS-03094-T7D9G0

Local Planning Authority (LPA) Reference: SCO/02231

Towy-Teifi Grid Connection

LPA Response to Scoping Consultation.

Gary Glenister BSc(Hons)DIP TP MRTPI

The Local Planning Authority has considered the Scoping Report and carried out limited consultation with internal and external stakeholders. The comments below are made based on the information available and are without prejudice to the formal consultation process once the DNS has been submitted. Where possible, the format is based on the questions set out in the Scoping Report.

3. Consideration of Alternatives

The alternatives need to include a route that is suitable for undergrounding. This needs to be assessed and a full justification made if this option is discounted. The DNS proposes Over Head Lines (OHL) along the preferred route that may well be unsuitable for undergrounding, however an alternative route may be acceptable for undergrounding and should be included in the list of options. Underground cables

5. Matters Scoped out.

There is general agreement that matters identified are material planning considerations but do not necessarily need to be in the EIA.

Do you agree that an assessment of Climate can be scoped out of the EIA process, noting that the consequences of climate change will be considered in individual environmental factor assessments and the standalone FCA?

Yes. The topic will be covered in individual chapters.

Do you agree that assessment of operational impacts on Population and Human Health can be scoped out of the EIA?

No. The pylon structures themselves are not likely to have a direct impact other than visual, however the impact of electricity transfer in close proximity to individuals along the route could be significant so the matter should be assessed as per the RVAA considered elsewhere.

<https://www.gov.uk/government/publications/electric-and-magnetic-fields-health-effects-of-exposure/electric-and-magnetic-fields-assessment-of-health-risks#:~:text=The%20results%20of%20some%20studies,near%20to%20large%20power%20lines.>

Do you agree that potential impacts to Population and Human Health incurred during construction can be sufficiently assessed and presented in other environmental factor chapters, such as noise?

Yes.

Do you agree that an assessment of Socio-economics can be scoped out of the EIA on the basis that it is not an environmental factor under the EIA Regulations and that a 'Socio-economic Information' report will be prepared and submitted with the DNS application?

Yes.

Do you agree that an assessment of Material Assets can be scoped out of the EIA on the basis that no significant effects are predicted?

Yes.

Do you agree that an assessment of Major Accidents and Disasters can be scoped out of the EIA on the basis that no significant effects are predicted?

Yes.

Do you agree that an assessment of EMF can be scoped out of the EIA on the basis that not significant effects are predicted?

No. See above. Research casts uncertainty over the health impacts of overhead lines in close proximity to residential properties so this should be assessed. There could also be an impact on mobile broadband and satellite signal.

Do you agree that assessment of environmental impacts associated with decommissioning can be scoped out of the EIA on the basis that this is not a requirement of the EIA Regulations, noting the high level of uncertainty associated with assessing the decommissioning phase and noting that PEDW will be consulted at that stage of the proposed scheme?

Yes. A decommissioning phase condition would be expected cover the environmental impacts.

6. Landscape and Visual Impact

Do you agree with the proposed LVIA study area?

It is considered that the proposed LVIA Study area is acceptable, however it is requested that the wider consideration of the initial 5km study area as set out in para 6.5 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.

It is requested that the final LVIA Study area be agreed with Carmarthenshire County Council prior to commencement of any landscape and visual assessment

Do you agree that the data sources listed to inform the LVIA are appropriate?

It is considered that the data sources set out in paragraphs 6.8 to 6.12 are generally appropriate for baseline data.

It is requested that a proposed methodology for consideration of the settlements/ groupings of properties within the extensive linear study area be developed for use within the LVIA. CCC can provide data sources for LDP based settlement types as a basis for development of an agreed methodology.

Paragraphs 6.16 to 6.30 provides further detail of the data sources it is advised that these data sources are appropriate.

Do you agree that the surveys proposed to inform the LVIA are appropriate?

The surveys identified appear to be solely those set out in paragraphs 6.13 to 6.15. It is considered that the scope of the proposed survey approach is appropriate at this stage

Are any receptors/ assets/ resources not identified that you would like to see included in the LVIA?

It is advised that the Tywi Valley Path Cycleway route will pass through the study area. This scheme is currently at the stage of discharge of prior to commencement planning conditions and is expected to start this year (2024). Receptors using this route should be included within LVIA.

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 is not clear as to how sites with extant planning consent for development will be addressed within the assessment, the status of potential future receptors and appropriate LVIA methodology should be fully considered.

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 final definition of receptors/ assets/ resources at this stage, it is requested that the final agreement be sought with Carmarthenshire County Council through further consultation, and prior to commencement of any landscape or visual assessment.

Do you agree with the landscape and visual receptors that are proposed to be scoped in and out of the EIA?

It is advised that the landscape and visual receptors to be scoped in are generally acceptable, however the justification set out under Residential visual amenity which details a 150m search area (from a new tower) is considered to be premature and 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 Residential visual amenity assessment.

It is advised that the landscape and visual receptors to be scoped out in general are acceptable, however some of the justifications set out contradiction to other areas of the Scoping Report, specifically: -

- 'Visual receptors outside 3 km study area' and
- 'Local Landscape Character Areas outside the 3 km study area'

Para 6.5 of the Scoping Report sets out that an initial 5km study area, it is advised that this approach be followed and used to refine the study area to establish thresholds for scoping out landscape and visual receptors.

Do you agree that existing SLA should be scoped out of the EIA if the classification is removed in the new Carmarthenshire LDP, noting their boundaries and characteristics would still be considered and referenced when assessing effects on local landscape character areas?

The existing Special Landscape Area designations are intended to be replaced in the new Carmarthenshire LDP by a robust Landscape Character planning policy which is underpinned by a Landscape Character Assessment (LCA).

The existing Special Landscape Area designations are based upon LANDMAP evaluations and boundaries, the same baseline considerations form the starting point of the LCA. If the SLA classification is removed it is advised that the LCA should provide the basis for assessment of impacts to Landscape Character and provide a more robust baseline in terms of identifying landscape characteristics and landscape value.

Are there any specific viewpoints that you would like us to consider and/ or illustrate as a photomontage?

There are no specific requests at this point, however it is requested that the final schedule of specific viewpoints be agreed with Carmarthenshire County Council through further consultation, and prior to commencement of any landscape or visual assessment.

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 provide final agreement at this point. 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.

Do you agree that due to the nature of OHLs, where the proposed scheme may give rise to effects on landscape and visual receptors that cannot be fully mitigated, operational effects should be assessed based upon the worst case scenario at year 1 only and not future years?

It assumed that this question implies that the increased future screening effects of growing vegetation would not be considered within the assessments. At this stage it is not clear whether offsite planting may be required as mitigation, and this should be kept as an option subject to the outcome of LVIA.

In general, the worst case scenario approach to assessment is acceptable.

Are there any other developments which you consider it will be necessary for us to address in a cumulative landscape and visual impact assessment?

The cumulative landscape and visual impacts with the proposed Tywi-Usk connection route (specifically at the southern end of the proposed Towy-Teifi connection route) should be fully addressed as part of assessment.

- The Scoping Report does not provide commentary on the specific methodology for cumulative landscape and visual impact assessment. 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.

- 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.

7. Biodiversity

Do you agree with the proposed consultees?

Do you agree with the proposed study areas?

Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?

Do you agree that the surveys proposed to inform the EIA baseline characterization are appropriate?

Are any receptors/ assets/ resources not identified that you would like to see included in the EIA?

Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?

Do you agree with the receptors/ matters that are proposed to be scoped in and out of the EIA?

I would recommend including how to ensure that the best overground or underground route is chosen for an electricity grid connection in terms of ecology. This would need to avoid ecologically sensitive areas such as wetlands, forests, nature reserves, and habitats of endangered species and identify potential routes and conduct a preliminary assessment to screen out the most ecologically sensitive areas.

A comparison of overground and underground options would need to consider ecological matters as overground lines can impact bird flight paths, while underground lines may disrupt soil and root systems. Balancing these impacts is fundamental to ecology to develop a detailed mitigation plan to address unavoidable impacts, including wildlife crossings for overground lines and protective measures for underground cables.

The scoping report identifies elements that are to be scoped into the EIA process based on the predicted potential effects, as well as those elements not considered necessary for further assessment, and should the above be included I concur with the conclusions of the Scoping Report.

8. Cultural Heritage

Do consultees consider the study area appropriate?

Heneb states “Yes, the extent of the study area has been consulted on and agreed.”

Cadw states “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 that a 1km study area for non- designated historic assets is also appropriate.”

Are there any other relevant consultees who should be consulted regarding this factor?

Heneb states “The report refers to consultation with Cadw. The County Conservation Officer and Built Heritage Officers should also be consulted.”

Cadw states “The archaeological planning services of the Heneb: The Trust for Welsh Archaeology 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.”

Are area consultees aware of any other supplementary guidance of relevance to the assessment of effects on historic assets?

Supplementary Planning Guidance: Archaeology and Development (Carmarthenshire Planning Authority, 2018). The Local Development Plan 2006 – 2021 is currently still valid.

Cadw states “The Historic Environment (Wales) Act 2023 will be enacted before the EIA is produced. This will replace The Ancient Monuments and Archaeological Areas Act 1979; The Historic Environment (Wales) Act 2016 and The Planning (Listed Building and Conservation Areas) Act 1990. The enactment of the Act will also lead to revisions to Technical Advice Note 24 :The Historic Environment 2017 and other guidance notes.”

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

Yes

Is the approach to surveys, including geophysical surveys, considered appropriate?

Yes, as mentioned above, Heneb would expect to see and approve a WSI for any such work in advance.

Cadw states “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 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.”

Are any receptors/ assets/ resources not identified that consultees would like to see included in the EIA?

No

9. Air

Do you agree with the proposed list of consultees?

Do you agree with the proposed study areas?

Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?

Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?

Are any receptors/ assets/ resources not identified that you would like to see included in the EIA?

Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?

Do you agree with the receptors/ matters that are proposed to be scoped in and out of the EIA?

Do you agree with the proposed factor-specific assessment approach?

Carmarthenshire County Council Public Protection has no comment at this stage.

10. Noise and Vibration

Do you agree with the proposed list of consultees?

Do you agree with the proposed study areas of 300m from work extents?

Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?

Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?

Are any receptors/assets/resources not identified that you would like to see included in the EIA?

Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?

Do you agree with the receptors/matters that are proposed to be scoped in and out of the EIA?

Do you agree with the proposed factor-specific assessment approach?

Carmarthenshire County Council Public Protection has no comment at this stage.

11. Traffic and Transport

Do you agree with the proposed list of consultees?

Do you agree with the proposed study areas?

Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?

Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?

Are any receptors/ assets/ resources not identified that you would like to see Green GEN Cymru 111 Towy Teifi Scoping Report 663927 included in the EIA?

Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?

Do you agree with the receptors/ matters that are proposed to be scoped in and out of the EIA?

Do you agree with the proposed factor-specific assessment approach?

Carmarthenshire Highways states the following.

“The preferred route as submitted presents several interactions with essential highway infrastructure, which support the strategic transport network and services to ensure the safe expeditious movement of people, goods, and services within the county. This includes the Trunk Road network (Welsh Governments Strategic Road Network) administered by the South Wales Trunk Road Agency.

A detailed appraisal of the potential impacts of both non-operational and operational phases, and the pylon routing will be required at such time a formal planning submission process is commenced. This includes the analysis of potential indivisible Abnormal Loads (AIL's) and Construction/Delivery Traffic Management. We therefore

reserve the right to comment on the proposals until such a time arises where a required level of detail, and information is made available for us to undertake a comprehensive, and in-depth assessment of the proposed project.

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 and matters to be scoped in and out are acceptable.”

Welsh Government Trunk Roads provides a detailed response on what would be required in the submission, and states the following which is quoted *ver batum*.

“It is understood the steel lattice tower locations are unknown at this stage, however, the documentation has identified the need for Abnormal Indivisible Load (AIL) notifications for the delivery of the mobile crane to site which is required to erect the towers.

Welsh Government would require further details to prove access for transporting AILs is achievable from the point of entry to the Welsh trunk road network to the point of egress, that minimises any impact on the safety and free flow of trunk road traffic. This information will be required prior to determination. The developer will need to supply AIL traffic routes to site, the likely traveling weights and dimensions of AILs and swept path analysis for all junctions on the Trunk Road Strategic network. The AILTMP would then be covered by condition (please see the relevant section in our standard conditions below / in the attached PAG document).

Please note, to screen the proposals, the draft abnormal load notifications would be particularly helpful to the Welsh Government as highway authority. For our review to be meaningful we need the attached to be filled in as much as is possible. There may be many unknowns at this time, but the closer we get to a completed form the more meaningful feedback we will be able to provide.

As an absolute minimum we would need best estimates for:

- Full route details.
- Vehicle weight
- Vehicle length
- Vehicle width
- Vehicle height

Reference is drawn to the draft version of our “Pulling Together” – Best Practice for Transporting Abnormal Loads in Wales - Procedures and Advice Guidance (PAG) document and below are our standard planning conditions (taken from the aforementioned PAG document attached), which would be included as part of any future planning application;

Structural assessment

No on-site development works shall be undertaken until:

- a. an assessment of the capacity and impact on all structures along those parts of the highway network which shall be utilised during the construction of the development including bridges, culverts, retaining walls, embankments, and
- b. details of any improvement works required to such structures as a result of construction of the development

have been submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The required improvement works identified in the assessment shall be completed prior to the commencement of any Abnormal Indivisible Load (AIL) deliveries to the development site.

Condition surveys

Condition surveys of all highway features along those parts of the highway network which shall be utilised during the construction of the development shall be undertaken prior to, during and on completion of the construction phase of the development. The survey reports shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) within 28 days of the surveys.

Liability for incidental damage

Prior to the commencement of development works, a scheme to provide for the remediation of any incidental damage directly attributable to the development to the parts of the highway network which will be utilised during the construction of the development including street furniture, structures, highway verge and carriageway surfaces shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The scheme shall be implemented as approved throughout the construction phase of the development.

Traffic Management Plan

AILs associated with the development shall be delivered strictly in accordance with a Traffic Management Plan (TMP) as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any works. The TMP shall include:

- a. proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
- b. evidence of trial runs that mimic the movement of the worst case AILs along the access route where appropriate, at the discretion of the Highway Authority
- c. number and size of AILs, including loaded dimensions and weights
- d. number and composition of AIL convoys, including anticipated escort arrangements
- e. methodology for managing trunk road traffic during AIL deliveries, including identification of passing places and holding areas as necessary
- f. convoy contingency plans in the event of incidents or emergencies
- g. estimated convoy journey durations and timings along the route, including release of forecast traffic queues
- h. swept path analysis modelling the movement of the worst case AILs at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
- i. proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed
- j. plans for the reinstatement of any temporary works after completion of the construction phase
- k. land ownership must be clarified on all drawings showing proposed highway modifications. The developer shall be responsible for the acquisition and reinstatement of all third party land including re-instatement of boundary features
- l. proposals to liaise with all relevant stakeholders and members of the public regarding construction traffic and AIL movements
- m. consideration of the cumulative impact of other abnormal load generating schemes proposing to use all or part of the same access route
- n. the appointment and role of a transport coordinator to administer the abnormal indivisible load delivery strategy
- o. means of control of timing of delivery of AIL movements
- p. temporary traffic diversions and traffic hold points
- q. details of banksmen and escorts for abnormal loads
- r. management and maintenance of layover areas, junctions, passing places, public rights of way and welfare facilities while AIL deliveries take place
- s. details of temporary signage.

t. details of any alterations to any works that are carried out to enable AIL movements

AILs associated with the maintenance and decommissioning of the development shall leave the site strictly in accordance with a TMP as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any removal, replacement or decommissioning works.

Highway works

No development works shall be undertaken until full details of any highway works associated with the construction of layover areas, passing places and highway improvements as agreed with each relevant highway authority including:

- a. the detailed design of any works
- b. geometric layout
- c. construction methods
- d. drainage, and
- e. street lighting

have been submitted to and approved in writing by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The highway works shall be completed in accordance with the approved details prior to the commencement of any AIL deliveries to the development site.

No development works shall be undertaken until the developer demonstrates rights of access to all proposed works that are not part of the highway network to the satisfaction of the local planning authority.

Road Safety Audit

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.

Section 278 Agreement

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.

Access onto the Trunk Road

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.

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.”

12. Geology and Hydrogeology

Do you agree with the proposed list of consultees? Green GEN Cymru 121 Towy Teifi Scoping Report 663927

Yes, Carmarthenshire County Council has been included as a consultee to inform the EIA development along with NRW, Welsh Government and Ceredigion County Council.

Do you agree with the proposed study area?

The proposed study area includes a 250m buffer around the proposed scheme. In terms of mineral resources, Planning Policy Wales, and the accompanying MTANs require buffer zones around mineral working sites, to provide areas of protection around permitted and proposed mineral workings sites. The inclusion of a 250m buffer zone for this study would be welcomed, as it could ensure the proposed development route would not encroach on permitted or proposed mineral sites, and their buffer zones or also on possible mineral sites and their buffer zones. The study area is considered appropriate.

Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?

There are further sources of data available, in addition to those listed in the report, and not limited to that listed here. The Carmarthenshire LDP is accompanied by the LDP Proposals map. The LDP and accompanying proposals map identifies mineral safeguarded areas for Category 1 Aggregates safeguarding areas (includes Sand and Gravel, High Specification Aggregate Sandstone and igneous rock, and Carboniferous Limestone), and Category 2 Aggregates Safeguarding (includes Sand and Gravel, Sandstone, Igneous rock, and slate). The maps are publicly available.

Additional data sources for mineral safeguarding is available on the BGS Aggregate Safeguarding Maps for South Wales. For operational and restored mineral sites, the South Wales Regional Aggregates Working Party (SWRAWP), and the developer is also advised to take into consideration dormant mineral sites, which albeit are not active sites, do have extant planning permission for mineral winning and working.

Additional data on mineral working available at the BGS and BGS Minerals UK (Minerals information online data).

Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?

Yes. The report proposes a walkover survey of the site as part of the baseline assessment rather than a desk based assessment.

Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?

Planning Policy Wales, MTAN and Carmarthenshire LDP (Policy MPP3 Mineral Safeguarding) provides the policy on Mineral Safeguarding and the requirements for developments which could permanently sterilise mineral resources. The proposal should address the requirements of the policies contained within Planning Policy Wales, MTAN and the LDP on Mineral Safeguarding.

For reference Carmarthenshire LDP Policy MPP3 Mineral Safeguarding states:

Planning permission will not be granted for development proposals where they would permanently sterilise resources of aggregates and coal identified within the mineral safeguarding areas (areas of search) identified on the proposals map unless:

The applicant can demonstrate that the extraction of the mineral is impracticable, uneconomic or environmentally unacceptable (including compromising amenity and social considerations); or

The mineral resource has already been extracted; or

The mineral can be extracted satisfactorily prior to the development taking place; or

The development is of a temporary nature and can be completed and the site restored within the timescale that the mineral is likely to be needed; or,

The nature and location of the development would have no significant impact on the potential working of the resource.

Do you agree with the receptors/ matters that are proposed to be scoped in and out of the EIA?

Mineral safeguarding is included as a receptor/ element to be scoped in at this stage, and would agree that the matter is to be scoped in. Planning Policy stresses the importance of safeguarding access to mineral resources which society may require in the future. In considering the impact of the development on mineral safeguarding, the developer should clearly address the Mineral safeguarding policy requirements, and how the development could impact on reserves and future resources.

Three areas of likely historical metalliferous mining have been identified in the report, and have been scoped out of the EIA, with reasoning that they are of limited extent being associated with mineral veins and potential adverse effects are considered unlikely. The report has not considered other mineral winning and working, including aggregates (Sand and gravel, sandstone etc), building / dimension stone, and borrow pits. Mining and quarrying (including historic) has not been included in the scope, and it is considered that this should be scoped in given the land (and minerals contained within), natural resources and the sustainable availability of resources could be significantly affected by the development and should be considered.

13. Land and Soil

Do you agree with the proposed study areas?

Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?

Do you agree that the surveys proposed to inform the EIA baseline characterisation are appropriate?

The Welsh Government Soil Policy and Agricultural Land Use Planning Unit states “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 Section 13.7 and Appendix 13.1 of scoping report). 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 the scoping report (Section 13.8) 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.”

Are any receptors / assets / resources not identified that you would like to see included in the EIA?

Do you agree with the receptors/ matters that are proposed to be scoped in and out of the EIA?

The Welsh Government Soil Policy and Agricultural Land Use Planning Unit states the following:

“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. At this stage, **BMV agricultural land should be scoped into the assessment.**

Soil Resources Management Plan (SRMP).

As detailed in Section 13.15, it is welcome that a Soils Resources Management Plan will be developed by the applicant and based on survey evidence and good practice guidance. 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. The SRMP should be a clear scheme and programme setting out how all soils and their function will be handled, conserved and reinstated and that can be confidently conditioned against.

The SRMP 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 Workings⁴' as some of the soils handling principals may be applicable to the proposed development. The Department considers that **impacts on soil during construction must be scoped into the assessment.**

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 PPW 125 , in respect of the ‘Step-wise approach’ (irreplaceable habitats including the natural resources which underpin them) and the new peatland paragraph at 6.4.34. 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. **Peat impacts must be scoped into the assessment.**

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 Map (UPM) and the Peatlands of Wales Map6 . The Peatland of Wales Map now supersedes the Unified Peat Map as noted in paragraph 6.4.34 pf PPW 12. The Department considers that the ‘Evidence Layer’ 7 of the Peatlands of Wales map should also be used as an evidence source, to inform the potential locations of peat deposits. 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.

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.”

14. Water

Do you agree that a full WFD assessment is not required?

Do you agree that runoff from the access track and tower bases can be dealt with via infiltration trenches or similar to direct runoff to the ground without attenuation?

Do you require attenuation of runoff from the new 132 kV substation if it is laid to hardstanding?

Do you agree that a targeted site inspection of Main Rivers that will be crossed by the proposed scheme will be sufficient to establish the baseline and that no further inspection or monitoring is required?

Do you agree that the proposed infrastructure would be classed as ‘essential infrastructure’?

Do you agree with the proposed study area and method of assessment?

Do you agree that matters to be scoped in and out of the EIA are appropriate, taking a precautionary approach?

SAB approval is needed so the impact of surface water will be fully assessed through that process.

15. Cumulative Effects

Reference is made to the EIA regulations but this is underlined by Policy 18 of Future Wales which has an overarching policy statement after the 11 criteria that “The cumulative impacts of existing and consented renewable energy schemes should also be considered.” The route introduces alien features into the landscape so needs to fully assess other existing and consented energy infrastructure. It is noted that the route passes other renewable schemes, namely Allt Wallis and Brechfa West Wind Farms and their cable route exporting power, along with smaller wind turbines. Given the proposed use of Pylons and Over Head Lines, the cumulative impact is likely to be significant so will need to be fully assessed in the EIA.

There is reference to the Nant Ceiment Energy Park near Cwmann, however there are no details given. Depending on the timing of any consent for this scheme and submission of the DNS, this could have a significant cumulative impact.

The cumulative impact of the proposed Pylons along with other Pylons will be significant the closer the route gets to the final destination as there are significant numbers of existing larger National Grid Pylons present and it would be a convergence point with other renewable schemes.

The methodology stated is reasonable and a list of schemes should be defined and assessed as part of the EIA. As stated above, a suitable underground route should be considered as an option for assessment.

Depending on the timing of the application there are known to be three wind energy parks in the vicinity of the proposed starting point, so cumulative impact could be significant even if not strictly restricted to consented schemes as there could be three sets of turbines and three sets of cables connecting to the grid.



Cyngor Sir
CEREDIGION
County Council

Russell Hughes-Pickering
Swyddog Arweiniol Corfforaethol : Economi ac Adfywio
Corporate Lead Officer : Economy and Regeneration

Neuadd Cyngor Ceredigion, Penmorfa, Aberaeron. SA46 0PA
www.ceredigion.gov.uk

Georgia Peters,
Planning Officer,
Planning and Environment Decisions Wales,
Welsh Government.

(Response sent via e-mail only to:
PEDW.Infrastructure@gov.wales)

Dyddiad Date	12/7/2024
Gofynnwch am Please ask for	Catrin Newbold
Llinell uniongyrchol Direct line	
Fy nghyf My ref	Q240105
Eich cyf Your ref	CAS-03094-T7D9G0
Ebost Email	

Dear Georgia Peters,

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

SCOPING DIRECTION

Potential DNS Application: Green GEN Towy Teifi Grid Connection

Site Address: Overhead line from the proposed Lan Fawr Energy Park to a proposed new substation near Carmarthen

Proposed Development: A 132kV overhead line connection from the proposed Lan Fawr Energy Park to a proposed new substation near Carmarthen (known as the Llandyfaelog substation).

Thank you for notifying Ceredigion County Council (CCC) that Planning and Environment Decisions Wales (PEDW) has received a request for a Scoping Direction in relation to the above mentioned proposal.

It is understood that the overhead line would be from the proposed Lan Fawr Energy Park, (which is proposed to be located east of Llanddewi Brefi and southeast of Tregaron and which will comprise approximately 40 wind turbines), to a proposed new substation south of Carmarthen (known as the Llandyfaelog substation).

At this stage, it is envisaged that the proposed scheme will comprise of the following elements:

- 132 kV OHL;
- 'L7' steel lattice towers (or similar) with a standard height of 27 metres (m) and average span length of 250 m (assumed to be approximately 208 towers in total);

Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg. Cewch ateb Cymraeg i bob gohebiaeth Gymraeg ac ateb Saesneg i bob gohebiaeth Saesneg. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome correspondence in Welsh and English. Correspondence received in Welsh will be answered in Welsh and correspondence in English will be answered in English. Corresponding in Welsh will not involve any delay.

Prif Weithredwr / Chief Executive :
Cyfarwyddwyr Corfforaethol / Corporate Directors :

Eifion Evans
Barry Rees
James Starbuck

- Approximately 52 km of double circuit OHL from the proposed Lan Fawr Energy Park to the proposed National Grid substation;
- A new 132 kV substation, adjacent to the proposed National Grid substation; and
- Temporary construction ancillary development works including 25 m x 25 m working area around the base of each standard tower (increasing to 50 m x 50 m for angle towers, if required), temporary access tracks, winching and pulling areas and construction compounds.

I note from your correspondence that you specifically require the LPA's advice in relation to the scope of the EIA and the proposed methodologies outlined in the Scoping Report.

The following comments are provided only in relation to the area of the site which is located within Ceredigion.

CHAPTER 5 – ENVIRONMENTAL FACTORS PROPOSED TO BE SCOPED OUT OF FURTHER ASSESSMENT:

Socio-Economic

The applicant proposes that socioeconomics be scoped out of the Environmental Impact Assessment (EIA). This is on the basis there is no definitive connection between the word 'population' in Schedule 4 of the EIA Regulations and impacts on businesses and finance.

The consideration of socioeconomic impacts, particularly tourism, as part of the EIA for such schemes has typically been raised by the Local Planning Authority (LPA) due to the contribution the landscape makes towards tourism. This has in part been due to Policy LU26 of the adopted Local Development Plan (LDP) which has informed the LPAs response to consultations on large wind farm developments and associated infrastructure.

It is noted that Policy LU26 relates specifically to Strategic Search Area D and not the proposed site. Moreover, this policy has been superseded following the publication of Future Wales: The National Plan 2040 (Future Wales) and the revoking of Technical Advice Note 8 (TAN 8). However, Planning Policy Wales (PPW) still requires proposals to minimise impacts on local communities, such as from noise and air pollution, to safeguard quality of life for existing and future generations.

The natural environment is a key factor in Ceredigion's economy, particularly in relation to tourism which is a major contributor to the County's economy. There is the possibility that negative environmental impacts may affect the economic wellbeing of local communities. It may therefore be prudent to consider socioeconomic impacts, particularly in relation to tourism, either as a standalone chapter or as part of other chapters where relevant.

Decommissioning

There is an expectation that energy related developments are decommissioned, and sites remediated as soon as their use ceases. Understanding the proposals for decommissioning would

provide greater clarity over possible environmental impacts and assist in identifying which factors ought to be assessed. Thus, Criterion 3 of LDP Policy LU25 requires the provision of a suitable scheme for decommissioning at the end of the operational design life of the infrastructure where appropriate.

Policy 18 of Future Wales also requires proposals to have acceptable provisions relating to decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration. This builds on the principles of PPW which identifies the following as key factors in the assessment process:

- will high standards of restoration, remediation, decommissioning and beneficial after uses be achieved; and
- will the causes and impacts of climate change be fully taken into account through location, design, build, operation, decommissioning and restoration.

Given the potential environmental impacts relating to decommissioning, and the emphasis and expectations national and local policy place on decommissioning, it is proposed that decommissioning is scoped into the EIA.

CHAPTER 6 – LANDSCAPE AND VISUAL:

As the study area in the Landscape and Visual Impact Assessment (LVIA) is being based on the extent of the area from which the development would be visible, then Natural Resource Wales' (NRW's) Guidance Note 46 should be used as a starting point for determining the size of the study area. For structures between 26 and 49 metres in height, search areas should be 4 to 8 km and study areas should be 2 to 5 km. It is preferable that a precautionary approach is taken when determining the size of the study area.

As the preferred route falls directly within the Dyffryn Teifi and Cambrian Mountains National Landscape Areas (NCLAs), consideration of these is welcomed. However, consideration should also be given to the Ceredigion NCLA as the Zone of Theoretical Visibility (ZTV) falls within this NCLA.

The proposed development would also be located within the Teifi Valley Special Landscape Area (SLA). Specific reference is made in the adopted SLA Supplementary Planning Guidance (SPG) about the potential cumulative impact that energy developments may have on the area's landscape. Regard should be had to the SPG when establishing the baseline characteristics of the area. As part of the assessment, the scale and nature of the development and its ability to be accommodated without significant damage to, and where possible enhancement of, the valued characteristics of the SLA should be considered.

With regards to identifying receptors, it is advised that any settlements named within the LDP which fall within the ZTV be considered. This is in addition to trunk roads and principle roads, Public Rights of Way (PROW), National Cycle Network (NCN) routes and designated areas. There should be no unacceptable adverse visual impacts on nearby communities and individual dwellings in accordance with Policy 18 of Future Wales. Therefore, the incorporation of isolated individual dwellings, or small groups of dwellings, as receptors would also be welcomed.

CHAPTER 7 – BIODIVERSITY:

- It is considered that all the relevant consultees have been considered.
- The buffer zones for the proposed study areas are suitable.
- It is considered that the data sources listed are appropriate to inform the baseline characterisation.
- It is considered that the ecological surveys proposed are suitable to inform the baseline characterisation.
- No additional receptors, assets or resources identified.
- The proposed additional mitigation measures are suitable and appropriate as detailed in section 7 of the scoping report.
- The receptors/ matters scoped in and out for further assessment are suitable.

It is noted that the proposed corridor route includes several areas of ancient woodland, a number of priority habitats as well as identified forestry on the National Forest Inventory 2020. The approach to arboriculture detailed in section 7 will ensure these features are considered and appropriate mitigation measures are implemented.

CHAPTER 8 CULTURAL HERITAGE:

The applicant intends to scope in effects relating to the change of the setting of historic assets during the operational period. Consideration of the setting of the Lampeter Conservation Area would therefore be supported. The LPA is in the process of preparing a Conservation Area Appraisal for Lampeter. Whilst this has not yet been adopted as SPG, it is at an advanced stage of preparation. The applicant should have regard to this when determining the baseline situation.

CHAPTER 9 AIR & CHAPTER 10 NOISE AND VIBRATION:

In 2023, the Welsh Government consulted on an updated Technical Advice Note 11 (TAN 11) which address air quality, noise and soundscapes. It is proposed that this would replace the existing TAN 11 which currently focuses on noise. Whilst outcomes of the consultation are still awaited, it may be prudent for the applicant to have consideration of the potential change in national guidance.

The applicant is seeking to scope out noise during the operational period. It is acknowledged that the applicant will seek to avoid placing infrastructure next to sensitive receptors where possible. However, where this is not possible, it may be worth considering the noise implications on nearby sensitive receptors as, by the statement's own admission, there may be noise in wet conditions.

Paragraph 6.7.25 of PPW notes that planning authorities should identify areas of cultural or historic importance to be given special consideration in terms of soundscape where this may be necessary to safeguard the vibrancy of places or provide tranquil, restorative environments within busy built-up areas. There should be consideration of the soundscape of historically important receptors in the area and the potential impact of the development on these.

CHAPTER 11 TRAFFIC AND MOVEMENT:

As part of any formal submission, further details should be provided in the form of a Transport Statement which considers the increased traffic trip generation to/from the site(s) and the likely impact of large construction/delivery vehicles on the minor County Road network which are generally narrow roads. Details of any mitigation measures should be included where any problematic areas are highlighted.

To supplement this, a Construction Traffic Management Plan (CTMP) should be prepared, to include delivery of materials, apparatus and machinery; additionally, details with regards to any proposed materials storage & workforce welfare/site office details should be included (i.e. provision for on-site parking for construction workers and a construction materials compound for the duration of the construction period, etc.)

CHAPTER 12 – GEOLOGY AND HYDROGEOLOGY:

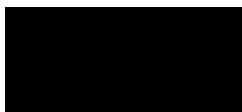
The proposed development is likely to fall within an Aggregate Safeguarding Area. Therefore, consideration of the development's impact on safeguarding the mineral resource is supported. The applicant should, however, have regard to Policy LU30 of the adopted LDP which still sets out the policy considerations for safeguarding.

CONCLUSION:

It is hoped that the above comments are of some assistance, however should you have any queries or require further information from the LPA, then please do not hesitate to get in touch.

Please note, this response is made at officer level and is given without prejudice. It is not to be held as binding on the Local Planning Authority or any of its elected members.

Yours sincerely,



Mrs. Catrin Newbold
Rheolwr Gwasanaeth (Rheoli Datblygu)
Service Manager (Development Management)
Ar ran Swyddog Arweiniol Corfforaethol: Economi ac Adfywio
On behalf of the Corporate Lead Officer: Economy and Regeneration

Ein cyf/Our ref: CAS-255720-K2K0
Eich cyf/Your ref: CAS-03094-T7D9G0

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

Dyddiad/Date: 13 June 2024

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 Teifi Grid Connection

Site Address: Overhead Line from the proposed Lan Fawr Energy Park to a proposed new substation near Carmarthen

Proposed Development: A 132kV overhead line connection from the proposed Lan Fawr Energy Park 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 9 May 2024.

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 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.

Chapter 7 - Landscape and Visual Amenity

Our advice concerns the statutory purposes of National Parks and National Landscapes (formerly Areas of Outstanding Natural Beauty (AONBs)). At the closest point, the proposed Overhead Line (OHL) would be located approximately 18km from the Brycheiniog National Park (BBNP), and approximately 15km from the Gower National Landscape. The majority of the proposals are located beyond these distances. At these distances, the proposals are not expected to result in any impacts on either designated landscape.

Notwithstanding, we have reviewed the Scoping Report and provided advice in relation to the questions at the end of Chapter 6 of the report on landscape and visual matters.

Consultee Questions

Do you agree with the proposed LVIA study area?

The proposed 132 kV OHL will comprise 'L7' steel lattice towers (or similar) with a standard height of 27m and average span length of 250m (approximately 208 towers in total). The height of structures within the proposed 132 kV substation is not clear.

The intention is for the Landscape and Visual Impact Assessment (LVIA) study area to focus on the landscape within 3km of the OHL route but will consider an initial search area of 5km from the boundary of the route to capture any sensitive viewpoints or landscapes. As above, there are no statutory designated landscapes within the search area.

We are satisfied with the approach set out in the Scoping Report and advise it accords with guidance on appropriate search and study areas contained in NRW Guidance Note 46: Using LANDMAP in Landscape and Visual Impact Assessments. 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, we advise that the scale of the overall transmission corridor is such that a pre-cautionary approach should be used. If, following detailed investigations, significant impacts are identified within 5km of the project, then the final study area should reflect this.

Do you agree that the data sources listed to inform the LVIA are appropriate?

The data sources are appropriate, but the following should also be considered.

We note the LVIA will consider guidance within the Ceredigion Local Development Plan (LDP) 2007-2022, and advise the following source is relevant:

- Ceredigion Local Development Plan 2007 - 2022 Supplementary Planning Guidance Special Landscape Areas Ceredigion County Council Adopted, April 2014. Available online here. [special-landscape-areas-supplementary-guidance-spg-april-2.pdf](https://ceredigion.gov.uk/sites/default/files/2014-04/special-landscape-areas-supplementary-guidance-spg-april-2.pdf) (ceredigion.gov.uk)

We note the authors of the LVIA will seek landscape character assessment information for and from Carmarthenshire County Council. We advise summary information on Special Landscape Areas (SLAs) is contained in Appendix 4 to the LDP. A Landscape Sensitivity

and Capacity Study prepared by Anthony Jellard Associates is also available and – whilst focused on Solar PV development – may contain relevant baseline information.

The Register of Historic Landscapes should be considered, and the historic landscape character assessments (HLCA) undertaken for these registered landscapes. The HLCA information is available online from the Dyfed Archaeological Trust. [Archaeology in Wales - Ymddiriedolaeth Archaeolegol Dyfed - Dyfed Archaeological Trust \(dyfedarchaeology.org.uk\)](http://Archaeology in Wales - Ymddiriedolaeth Archaeolegol Dyfed - Dyfed Archaeological Trust (dyfedarchaeology.org.uk))

There is a new nationally consistent Tranquillity & Place resource which includes information on visually tranquil places (Theme 5), and which is likely to be relevant to the LVIA for this proposal. This information is available online [Tranquillity and Place \(arcgis.com\)](http://Tranquillity and Place (arcgis.com)) and is also provided for each LANDMAP visual and sensory aspect area, via the existing LANDMAP information pages.

We advise the LVIA figures should include a shaded topographical relief map to illustrate the relationship between the OHL route and landform. This should be presented at a legible scale, no smaller than the 5 layout sheets (A-E) included in the LVIA scoping figures.

Do you agree that the surveys proposed to inform the LVIA are appropriate?

We assume, because it is not stated in paragraphs 6.13-15, that wintertime photography will be included in the LVIA given the period of time over which the site survey work will be undertaken. For the avoidance of doubt, we advise winter viewpoint photography should be included in the LVIA.

Are any receptors/ assets/ resources not identified that you would like to see included in the LVIA?

It is not clear what landscape units will be used for assessment purposes within the LVIA. In relation to this, NLCs are referred to as well as character areas within the Carmarthenshire assessment, and local level character areas described by the authors. We advise the latter – a project specific assessment – is likely to be the most useful and therefore appropriate method, i.e., to delineate and describe local landscape character areas for assessment purposes based on site survey and existing evidence within National Landscape Character Area descriptions, LANDMAP, and local authority level assessments.

Do you agree with the landscape and visual receptors that are proposed to be scoped in and out of the EIA?

If, following detailed investigations, significant impacts are identified beyond 3km (within the wider 5km search area), then these receptors should be scoped in.

Do you agree that existing SLA should be scoped out of the EIA if the classification is removed in the new Carmarthenshire LDP, noting their boundaries and characteristics would still be considered and referenced when assessing effects on local landscape character areas?

If the classification is removed, it is not because the landscape no longer has high value. The most important matter is for the LVIA to identify what aspects are valued and why, and how, and to what extent these would be affected by the proposed development.

Are there any specific viewpoints that you would like us to consider and/ or illustrate as a photomontage?

The LPAs are best placed to advise on specific local viewpoints. As a general principle, we recommend viewpoints are included which represent different perspectives, including where available, elevated views over the OHL corridor.

Do you agree that due to the nature of OHLs, where the proposed scheme may give rise to effects on landscape and visual receptors that cannot be fully mitigated, operational effects should be assessed based upon the worst-case scenario at year 1 only and not future years?

If no mitigation planting is proposed, there is unlikely to be any material difference between the impacts in Year 1 and later years, and therefore the Year 1 assessment would suffice. This should however consider the differences in impact between summer and winter months in terms of the screening / softening function of existing vegetation cover.

Notwithstanding this, the initial LVIA should identify any opportunities where mitigation planting would be effective, as well as opportunities for offsetting the impacts of the proposal where planting and other forms of mitigation are unlikely to be effective. In cases where mitigation planting is proposed, the assessment should consider its longer-term impact, both in winter and summer months.

We also note that underground cables will be considered in the most sensitive landscape areas or where the presence of OHL will be particularly dominant and impactful upon visual receptors. We encourage these areas / receptors to be identified at the earliest opportunity in consultation with stakeholders. Sensitive areas will include those sections which align through the Teifi and Tywi Valleys, the latter valley also falls within the study area for the proposed Green GEN Towy-Usk OHL corridor, also currently at scoping.

Are there any other developments which you consider it will be necessary for us to address in a cumulative landscape and visual impact assessment?

We advise potential cumulative impacts with the Green GEN Towy-Usk OHL corridor should be considered given the similar nature of the proposals, and their potential proximity within the landscape east of Carmarthen, including within the southern part of the Tywi Valley.

The Local Planning Authority's are best placed to advise on other cumulative developments.

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.

We note that bats, great crested newts, dormice, otters, pine martens and red squirrels are stated to be scoped in for further survey as part of the ES. However, the nature and/ or scope for some of the species remains unclear, as outlined in the following sections. Water vole survey effort is proposed to be limited to a visual inspection during the otter survey, unless signs of the presence of the species are identified during the walkover.

Bats

We observe that the route of the OHL has the potential to affect habitats with significant numbers of trees with potential to support roosting bats. We note that reflective of the current scale of the 'potential corridor', surveys for bats are proposed to include data search, habitat assessment for bats, and static surveys during spring, summer, and autumn. (Table 7.2 refers to transect surveys. Since there is no further reference to this method of survey, we assume this is a misprint.) We further note that the results of static bat surveys will be used to determine bat species and activity levels in each directly impacted woodland block (Section 7.19) and that this information will be used to scope likely roost impacts.

We advise that the results of the above surveys should be used to determine the need for further surveys, especially of rare woodland bats. For example, should activity data gathered during static or transect surveys indicate the presence of barbastelle or Bechstein's bats, we would anticipate that further surveys to identify roost location would be undertaken to inform the ES.

Should bat roosts subsequently be suspected or confirmed, we advise that an assessment of the impacts of the scheme on these roost sites, and proposals to retain, mitigate and/ or compensate for them, are included in the ES. Where possible, it would be expected that important features for bats would be retained and their function for bats protected.

In due course, detailed assessment of trees along the identified corridor will be required once the refined route is known.

All surveys should be undertaken in accordance with the best practice guidance '*Bat Surveys for Professional Ecologists – Good Practice Guidelines*' (4th edition), published by the Bat Conservation Trust, 2023.

We advise that measures to maintain flight connectivity for bats during and after construction are included in the ES, regardless of whether potential flight corridors have been surveyed for these species.

Great crested newts (GCN)

We note from the Scoping Report that Habitat Suitability Index and eDNA surveys are proposed to be undertaken of ponds "*within 500 m*". It is not entirely clear whether the above means surveys will cover areas within 500 metres of the centre line of the preferred route or the centre line of the preferred corridor, or within 500 metres of any areas of habitat requiring permanent or temporary clearance; we advise this is confirmed within the ES.

Where eDNA surveys indicate GCN are present, population size class surveys using traditional survey techniques (bottle trapping, torching, and egg counts) are proposed to be undertaken. We welcome this approach. We advise that the results of GCN surveys and

appropriate avoidance/ mitigation/ compensation proposals as necessary form a part of the ES submission.

Dormouse, otter, red squirrel, pine marten

Although Table 7-2 (*Biodiversity matters proposed to be 'scoped in' to the EIA*) of the scoping report indicates that the above species have been scoped in for assessment of the likely direct and indirect effects of the proposals during the construction phase, no information is provided on the intended survey effort. We advise that all surveys are undertaken following best practice guidance where this exists, and the results of all surveys for the above species, along with any avoidance/ mitigation/ compensation proposals as necessary, form a part of the ES submission.

With respect to otter, we advise that surveys include an assessment of the potential of habitats to be used as natal sites.

We advise that the ES include a full description of measures to minimise habitat loss and fragmentation during construction and operation for all protected species affected by the proposed development.

Impact Assessment

Should protected species be confirmed, 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 comprehensive descriptions of the habitats affected are included to support robust conclusions about their significance for the species.

We advise that where European Protected Species (EPS) and/ or nationally fully protected species are present, the development maintains habitat connectivity across the route of the cables, particularly if/ where undergrounding cables proves necessary.

We advise that the ES considers significance (both alone and in combination) and where applicable conservation status. In respect of conservation status, we advise consideration is given to the current conservation status of the relevant species. The ES must demonstrate that there will be no detriment to maintenance of favourable conservation status (FCS) of the species during construction, operation and where relevant decommissioning phases of the scheme.

Where proposals implicate protected species, which are also notified features of designated sites (e.g., SAC, SSSI), 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 2024, section 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009).

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 those that are considered important for the conservation of biological diversity in Wales.

NRW 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, mammal groups).

Ornithology

Bird Surveys

These surveys should be in line with industry best practice (see Bird Survey Guidelines). Additional, species-specific surveys may also be required and should be informed by the habitat on site as well as the results of any desktop survey conducted to date. The methods can be species specific and may require different timings (both during the day/night and seasonally). As we are not in receipt any detailed survey information, we are not able to provide an exhaustive list of the species-specific surveys we would expect to be included within the ES. Where surveys for barn owls are needed, these should refer to Barn Owl Survey Methodology and Techniques for use in Ecological Assessment | CIEEM.

Determining Species Importance

Determining the importance of species and populations identified from surveys should refer to Wales specific resources and publications where practical. Relevant population estimates can be found in, but not limited to, Hughes et al. 2020 (Wales) and Woodward et al. 2020 (UK/Britain). County Bird Reports, the Welsh Bird Reports, as well as Birds of Wales/Adar Cymru (Pritchard et al. 2021) may also contain relevant information.

Reference should be made to Birds of Conservation Concern Wales 4 (BoCCW4) as well as listing on Section 7 of the Environment Act (Wales) 2016, and Schedule 1 of the Wildlife & Countryside Act 1981 (as amended).

Mitigation, compensation, and enhancements

Details of appropriate mitigation or compensation for any impacts identified should be provided along with appropriate enhancements. In some instances, mitigation may need to take the form of curtailment or redirection of activities during particular times of year. Where buffer distances are required or need to be considered then reference should be made to Goodship & Furness 2022 or alternative published references for species not listed within Goodship & Furness 2022.

Protected Sites

Annex 1 shows the sites and their notable features that are close or within the proposed scoping route. **We advise that you consider impacts to all the notified features of these sites.** The maps within the scoping report do not show the Special Area of Conservation (SAC) and the Site of Special Scientific Interest (SSSI) rivers as priority habitat, we would advise that these are updated.

Fish

We agree with the proposed study areas, but we advise that diadromous fish are mobile receptors for the Cardigan Bay and Estuaries SAC, and therefore should be included in Table 7-1 of designated sites within or functionally linked to the study area. Data on fish populations can be accessed on [DataMapWales](#).

We would advise that fish remain scoped into the assessment of construction impacts until further details of how the cables will cross river crossings can be provided. We also note that the River Tywi SAC is not identified as a SAC in the Biodiversity maps in Appendix 2.

Depending on the method for the individual river crossings, we advise that additional mitigation may be required, for example if open-cut techniques were being used.

We advise that the surveys proposed to inform the EIA baseline characterization are appropriate.

Consultee Questions

Do you agree with the proposed consultees?

We would advise that the local ecology county recorders also be consulted.

Do you agree with the proposed study areas?

Yes

Do you agree that the data sources listed to inform the EIA baseline characterisation are appropriate?

See ornithology comments above.

We would advise that a full data request must be applied for from West Wales Biodiversity Information Centre (WWBIC).

Do you agree that the surveys proposed to inform the EIA baseline characterization are appropriate?

See ornithology comments above.

Are any receptors/ assets/ resources not identified that you would like to see included in the EIA?

We would advise lower plant surveys in areas where habitat is suitable and whereby proposal will impact i.e., woodland habitat or grassland fungi (semi-natural grassland) are carried out.

Do you agree with the proposed additional (secondary and tertiary) mitigation measures and is this mitigation appropriate?

Overall, yes however additional mitigation may be required depending on the results of the suite of bird surveys.

Do you agree with the receptors/ matters that are proposed to be scoped in and out of the EIA?

This will be dependent on the results of the suite of bird surveys.

We don't agree with the fish species and invertebrates being scoped out as some of these species are features of the SAC and SSSI.

Chapter 9 (Air)

We are unable to provide any advice on the impact of air quality until further information and assessments are made on the potential impacts on the nearby protected sites and their features.

Chapter 12 (Geology and Hydrogeology) & Chapter 13 (Land and Soil)

We have reviewed Chapter 12 (Geology and Hydrogeology) and Chapter 13 (Land and Soil) of the Scoping Report. Please see our comments below:

12.31 As part of the detailed pre-construction design, a suitable environmental, hydrogeological, and geotechnical site investigation will be undertaken in accordance

with current best practice including BS5930, BS10175 and Eurocode 7 which will inform, if required, a site remediation strategy, slope stability assessment and piling risk assessment where appropriate.

Please can we have confirmation that the Site Investigation intrusive locations correspond exactly to where the 208 towers and their piles will be located. Also, would each tower location comprise a minimum of 4 piles for each tower?

If there were to be a local issue, such as localised contamination being encountered at a particular tower location, is there provision to microsite and move the tower some suggested distance away or are the tower locations completely fixed based on the lengths/mass of the electrical cables that need to span two respective towers?

If the locations of towers are fixed at a particular location and some degree of contamination (soils and/or groundwater) is encountered, the nature of that contamination would need to be assessed and discussed with the local authority to find the best way forward. Bespoke piling risk assessments may be required as alluded to in paragraph 12.31 above. This risk could probably be captured within a Construction Environmental Management Plan (CEMP) and at full application stage we may ask that an 'Unsuspected Contamination Condition' be included in any planning permission granted as unsuspected contamination can potentially be encountered at any type of development site or along the route of a linear infrastructure project.

We have only one comment in relation to the questions in Sections 12.43 and 13.26.

Consultee questions

Do you agree with the receptors/ matters that are proposed to be scoped in and out of the EIA?

We do not agree that **peat** should be scoped out. A baseline assessment and impact assessment should be included for this receptor. We also advise that the applicant ensures peat depth is included.

Chapter 14: Water

Flood Risk

In summary, we support the approach that a standalone Flood Consequences Assessment (FCA) will be produced. We would expect the FCA 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 assets.

There is an acknowledgement for potential requirement for Flood Risk Activity Permits (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 Development Flood Risk Team to discuss these requirements.

Water Quality

We support the Applicant's decision to include Carmarthen Bay and Estuaries SAC as a relevant designated site listed in Table 7-1 of the Scoping Report for consideration of potential impacts via pollution. We note reference to the Cardigan Bay SAC and the West Wales Marine SAC and advise that these protected areas should also be included for appropriate assessment.

We advise that the data sources proposed for assessment of marine water quality are appropriate.

We advise that NetRegs ([Guidance for Pollution Prevention \(GPP\) documents | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland](#)) should be referred to for guidance on best practise when developing the CEMP.

We advise that in assessing compliance with the Water framework Directive (WFD) regulations, the applicant should include an assessment of impacts of the decommissioning phase of the proposed works. If the assumption is being made that the works for decommissioning will mirror those for the construction, this must be stated explicitly in the WFD compliance assessment.

We recommend that a post-consent condition is applied to ensure that all decommissioning works will either mirror the construction works, or that the environmental impact will be reassessed when decommissioning consent is applied for separately.

We support the general approach of assuming the worst-case scenario for likely significant effect and assessing, designing, and planning accordingly, and specifically scoping in the potential transfer of sediment and pollutants to Main River SACs and their Main River tributaries. We advise that this approach should be applied to hydrologically and/or ecologically linked SACs such as the Carmarthen Bay and Estuaries SAC, Cardigan Bay SAC and the West Wales Marine SAC.

We advise the Applicant that a marine licence may be required for works near Carmarthen as the works extend beyond the Mean High-Water Line.

Consultee Questions

Do you agree that a full WFD assessment is not required?

See our comments above.

Do you agree that runoff from the access track and tower bases can be dealt with via infiltration trenches or similar to direct runoff to the ground without attenuation?

In principle, yes. However, we have not been provided with the lengths or total area of access tracks and bases, our preference would be to provide an answer to this question once the potential runoff is quantified, combined with the location of these tracks and bases (i.e., to assess if flood risk is increased to any nearby properties and land). We consider this is also a matter for the Lead Local Flood Authority and SuDS Approval Body within the relevant local authority, we recommend they are contacted with regards to this query.

Do you require attenuation of runoff from the new 132 kV substation if it is laid to hardstanding?

Attenuation is unlikely; however, we would require more detail on area/flood plain lost to any such hardstanding.

Do you agree that a targeted site inspection of Main Rivers that will be crossed by the proposed scheme will be sufficient to establish the baseline and that no further inspection or monitoring is required?

We are not clear on what is meant by this question; however, we would have considered that it depends on what the outcome of the targeted site inspection is before a decision can be made on whether or not further inspection or monitoring is required.

Do you agree that the proposed infrastructure would be classed as 'essential infrastructure'?

We believe 'essential infrastructure' is a term used within the England planning guidance and not specifically referred to in the current TAN15, so not directly applicable in Wales. We believe this proposed development would be classed as 'Less Vulnerable Development' as contained within both the existing TAN15 and the latest draft of the proposed revision of TAN15. We can provide our advice on vulnerability classification however this is primarily a matter for the Local Planning Authority to consider with further advice from Planning and Environment Decisions Wales (PEDW) if required.

Do you agree with the proposed study area and method of assessment?

Yes.

Do you agree that matters to be scoped in and out of the EIA are appropriate, taking a precautionary approach?

We note that the 'potential increase in flood risk due to construction or upgrade of bridges for access over watercourses' has been scoped out - what evidence is there that the design of the bridges will ensure flows are maintained? What if any blockage scenarios will have been assessed?

We consider that ordinary watercourses should have a baseline assessment and impact assessment for sediment and other pollutants so do not agree to this receptor being scoped out.

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:

[REDACTED]

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.

Please note there are some details within this document that are confidential and are not to be made available to the general public.

Annex 1

Afon Teifi SAC features:

- Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoetes-Nanojuncetea
- Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation
- Cottus gobio
- Lampetra fluviatilis
- Lampetra planeri
- Luronium natans
- Lutra lutra
- Petromyzon marinus
- Salmo salar

Afon Teifi SSSI features:

- Cettia cetti - breeding
- Cottus gobio
- Gomphus vulgatissimus
- Lampetra fluviatilis
- Lampetra planeri
- Lutra lutra
- Margaritifera margaritifera
- Oecitis notata
- Petromyzon marinus
- Salmo salar
- Thecla betulae
- Tursiops truncatus
- Vertigo lilljeborgi
- Ylodes simulans
- Fluvial geomorphology of Wales
- Carex aquatilis
- Cryphaea lamyana
- Luronium natans
- Potamogeton x olivaceus
- Ranunculus penicillatus subsp. pseudofluitans
- Rorippa islandica
- Aquatic invertebrate assemblage
- Assemblage of RDB and/or Nationally Scarce and/or Atlantic-Western British bryophytes
- Assemblage of RDB and/or Nationally Scarce vascular plants
- Breeding bird assemblage of lowland open waters and their margins
- Wintering bird assemblage
- Marshy grassland

- Marginal/inundation habitat
- Running water
- Semi-natural woodland
- Standing water
- Swamp
- *Chrysolina sanguinolenta*
- *Simulium morsitans*
- *Carex punctata*
- *Riccia huebeneriana*
- *Sibthorpia europaea*
- *Trichomanes speciosum*

The connection appears to be crossing the Afon Talog which is a tributary of the Afon Teifi SSSI & SAC (Map Section 3)

Caeau Blaen-bydernyn SSSI

The connection appears to be crossing the Afon Talog which is a tributary of the Afon Teifi SSSI & SAC (Map Section 3).

- Acid grassland
- Marshy grassland

Bishops Pond SSSI

- Standing water
- Swamp

Afon Tywi SAC

- *Alosa alosa*
- *Alosa fallax*
- *Cottus gobio*
- *Lampetra fluviatilis*
- *Lampetra planeri*
- *Lutra lutra*
- *Petromyzon marinus*

Afon Tywi SSSI

- *Alosa alosa*
- *Alosa fallax*
- *Charadrius dubius* - breeding
- *Gomphus vulgatissimus*
- *Lutra lutra*
- *Riparia riparia* - breeding

- River shingle invertebrate assemblage
 - Saltmarsh (don't think this present for the current route)
 - Coastal geomorphology of Wales
 - *Cryphaea lamyana*
 - *Rhytidiadelphus subpinnatus*
 - Assemblage of RDB and/or Nationally Scarce vascular plants
 - Running water
 - Allt Pen y coed Stream Section SSSI
 - Geology – Arenig-Llanvirn
-
- Salt-marsh (don't think this present for the current route)
 - Coastal geomorphology of Wales
 - *Cryphaea lamyana*
 - *Rhytidiadelphus subpinnatus*
 - Assemblage of RDB and/or Nationally Scarce vascular plants
 - Running water

Allt Pen y coed Stream Section SSSI

- Geology – Arenig-Llanvirn

Pine Lodge Meadows SSSI (may not be impacted but just within 1km of scoping route)

- Neutral grassland



Planning and Environment Decisions Wales

Eich cyfeirnod
Your reference

CAS-03094-T7D9G0

Sent by email

Ein cyfeirnod
Our referenceDyddiad
Date

7 June 2024

Llinell uniongyrchol
Direct line

0300 025 6007

Ebost
Email:Cadwplanning@gov.wales

Dear Sir / Madam

EIA Scoping Direction Consultation - Green GEN Towy Teifi Grid Connection
REF: CAS-03094-T7D9G0

Thank you for your letter of 9 May 2024 asking for Cadw's view on the above.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

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 Teifi Grid Connection.

The scoping request is accompanied by a scoping report prepared by RSK. Chapter 8 of this document considers the works required to assess the impact of the proposed development on Cultural Heritage.

Six Questions are asked the end of Chapter 8. Our answers to these questions are given below.

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 that a 1km study area for non- designated historic assets is also appropriate.

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

The archaeological planning services of the Heneb: The Trust for Welsh Archaeology 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.

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

The Historic Environment (Wales) Act 2023 will be enacted before the EIA is produced. This will replace The Ancient Monuments and Archaeological Areas Act 1979; The Historic Environment (Wales) Act 2016 and The Planning (Listed Building and Conservation Areas) Act 1990. The enactment of the Act will also lead to revisions to Technical Advice Note 24: The Historic Environment 2017 and other guidance notes.

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

Yes.

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 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.

6. Are any receptors/ assets/ resources not identified that consultees would like to see included in the EIA

No

Yours sincerely

Nichola Smith
Historic Environment Branch



Ref: DNS CAS-03094-T7D9G0

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

Via Email: PEDW.Infrastructure@gov.wales

12th of June 2024.

Dear Georgia Peters,

Re: Scoping Direction Consultation Response – DNS CAS-03094-T7D9G0 – Green GEN Towy-Teifi Grid Connection Project.

I refer to the e-mail from PEDW on the 9th of May, 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. Agricultural Land Classification (ALC) – Information Sources (Section 13.5).

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 Section 13.7 and Appendix 13.1 of scoping report). The Department wishes to confirm and clarify that the maps should be used together with the published Guidance Note².

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>

As an additional data source, 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 the scoping report (Section 13.8) in areas of predicted BMV agricultural land, ALC surveys will be undertaken to confirm the grades present and their distribution. This is welcomed 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.

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

If the refined proposals do involve development 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. At this stage, **BMV agricultural land should be scoped into the assessment**.

3. Soil Resources Management Plan (SRMP).

As detailed in Section 13.15, it is welcome that a Soils Resources Management Plan will be developed by the applicant and based on survey evidence and good practice guidance. 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.

The SRMP should be a clear scheme and programme setting out how all soils and their function will be handled, conserved and reinstated and that can be confidently conditioned against. The SRMP 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;

³ [https://datamap.gov.wales/layers/inspire-wg:Post 1988 ALC Wales Surveys](https://datamap.gov.wales/layers/inspire-wg:Post%201988%20ALC%20Wales%20Surveys)

- Size, location, construction, management and period of soil storage dumps;
- Proposed restoration/reinstatement programme, including techniques and aftercare programme.

The Department agrees with the relevant guidance regarding soils noted at Section 13.21. **The Department considers that impacts on soil during construction must be scoped into the assessment.**

4. 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 PPW 12⁴, in respect of the ‘Step-wise approach’ (irreplaceable habitats including the natural resources which underpin them) and the new peatland paragraph at 6.4.34. 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. **Peat impacts must be scoped into the assessment at this stage.**

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 Map (UPM) and the Peatlands of Wales Map⁵. The Peatland of Wales Map now supersedes the Unified Peat Map as noted in paragraph 6.4.34 of PPW 12. The Department considers that the ‘Evidence Layer’⁶ of the Peatlands of Wales map should also be used as an evidence source, to inform the potential locations of peat deposits. 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.

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.”*

⁴ <https://www.gov.wales/planning-policy-wales>

⁵ <https://datamap.gov.wales/maps/peatlands-of-wales-maps/>

⁶ https://datamap.gov.wales/layers/geonode:peatlands_of_wales_evidence_2nss

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 & Rural Affairs
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-03094-T7D9G0

Ein cyf / Our ref 24/NM-6497

28 May 2024

Dear Sir/Madam,

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

**A 132kV overhead line connection from the proposed Lan Fawr Energy Park to a proposed new
substation near Carmarthen**

Green GEN Towy Teifi Grid Connection

I refer to your consultation of 09/05/2024 regarding the above application. It is understood the steel lattice tower locations are unknown at this stage, however, the documentation has identified the need for Abnormal Indivisible Load (AIL) notifications for the delivery of the mobile crane to site which is required to erect the towers.

Welsh Government would require further details to prove access for transporting AILs is achievable from the point of entry to the Welsh trunk road network to the point of egress, that minimises any impact on the safety and free flow of trunk road traffic. This information will be required prior to determination. The developer will need to supply AIL traffic routes to site, the likely traveling weights and dimensions of AILs and swept path analysis for all junctions on the Trunk Road Strategic network. The AILTMP would then be covered by condition (please see the relevant section in our standard conditions below / in the attached PAG document).

Please note, to screen the proposals, the draft abnormal load notifications would be particularly helpful to the Welsh Government as highway authority. For our review to be meaningful we need the attached to be filled in as much as is possible. There may be many unknowns at this time, but the closer we get to a completed form the more meaningful feedback we will be able to provide.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE

Trafnidiaeth
Llywodraeth Cymru
Parc Cathays
Caerdydd

Transport
Welsh Government
Cathays Park
Cardiff

As an absolute minimum we would need best estimates for:

- Full route details.
- Vehicle weight
- Vehicle length
- Vehicle width
- Vehicle height

Attached for reference, is the draft version of our “Pulling Together” – Best Practice for Transporting Abnormal Loads in Wales - Procedures and Advice Guidance (PAG) document and below are our standard planning conditions (taken from the aforementioned PAG document attached), which would be included as part of any future planning application;

Structural assessment

No on-site development works shall be undertaken until:

- a. an assessment of the capacity and impact on all structures along those parts of the highway network which shall be utilised during the construction of the development including bridges, culverts, retaining walls, embankments, and
- b. details of any improvement works required to such structures as a result of construction of the development

have been submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The required improvement works identified in the assessment shall be completed prior to the commencement of any Abnormal Indivisible Load (AIL) deliveries to the development site

Condition surveys

Condition surveys of all highway features along those parts of the highway network which shall be utilised during the construction of the development shall be undertaken prior to, during and on completion of the construction phase of the development. The survey reports shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) within 28 days of the surveys.

Liability for incidental damage

Prior to the commencement of development works, a scheme to provide for the remediation of any incidental damage directly attributable to the development to the parts of the highway network which will be utilised during the construction of the development including street furniture, structures, highway verge and carriageway surfaces shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The scheme shall be implemented as approved throughout the construction phase of the development.

Traffic Management Plan

AILs associated with the development shall be delivered strictly in accordance with a Traffic Management Plan (TMP) as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any works. The TMP shall include:

- a. proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
- b. evidence of trial runs that mimic the movement of the worst case AILs along the access route where appropriate, at the discretion of the Highway Authority
- c. number and size of AILs, including loaded dimensions and weights
- d. number and composition of AIL convoys, including anticipated escort arrangements
- e. methodology for managing trunk road traffic during AIL deliveries, including identification of passing places and holding areas as necessary
- f. convoy contingency plans in the event of incidents or emergencies
- g. estimated convoy journey durations and timings along the route, including release of forecast traffic queues
- h. swept path analysis modelling the movement of the worst case AILs at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
- i. proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed
- j. plans for the reinstatement of any temporary works after completion of the construction phase
- k. land ownership must be clarified on all drawings showing proposed highway modifications. The developer shall be responsible for the acquisition and reinstatement of all third party land including re-instatement of boundary features
- l. proposals to liaise with all relevant stakeholders and members of the public regarding construction traffic and AIL movements
- m. consideration of the cumulative impact of other abnormal load generating schemes proposing to use all or part of the same access route
- n. the appointment and role of a transport coordinator to administer the abnormal indivisible load delivery strategy



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- o. means of control of timing of delivery of AIL movements
- p. temporary traffic diversions and traffic hold points
- q. details of banksmen and escorts for abnormal loads
- r. management and maintenance of layover areas, junctions, passing places, public rights of way and welfare facilities while AIL deliveries take place
- s. details of temporary signage.
- t. details of any alterations to any works that are carried out to enable AIL movements

AILs associated with the maintenance and decommissioning of the development shall leave the site strictly in accordance with a TMP as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any removal, replacement of decommissioning works.

Highway works

No development works shall be undertaken until full details of any highway works associated with the construction of layover areas, passing places and highway improvements as agreed with each relevant highway authority including:

- a. the detailed design of any works
- b. geometric layout
- c. construction methods
- d. drainage, and
- e. street lighting

have been submitted to and approved in writing by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The highway works shall be completed in accordance with the approved details prior to the commencement of any AIL deliveries to the development site.

No development works shall be undertaken until the developer demonstrates rights of access to all proposed works that are not part of the highway network to the satisfaction of the local planning authority.

Road Safety Audit

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.

Section 278 Agreement

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.

Access onto the Trunk Road

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.

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.

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

Yours faithfully

Jason Ingram



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Welsh Government Motorway and Trunk Road Network

‘Pulling Together’ Best Practice for Transporting Abnormal Loads in Wales

Instructions for use:

This guidance document is intended for use by hauliers and developers planning to generate abnormal load movements on Trunk Roads and Motorways in Wales.

It outlines the statutory process for planning and conducting safe and effective abnormal load movements in agreement with all relevant authorities and organisations.

This document supersedes any previous advice issued by the Welsh Government regarding this process.

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1 INTRODUCTION

1.1 Document purpose

Our highways are, in the most part, built to accommodate a certain maximum vehicle size and weight. These vehicle limits are defined and upheld by UK law and most daily movements can be completed within them. However, some particular vehicle types and indivisible freight loads fall outside these limits and so are known as 'abnormal loads'. These typically include:

- Vehicle carrying an oversize or overweight load
- Mobile cranes
- Engineering plant
- Road recovery vehicles

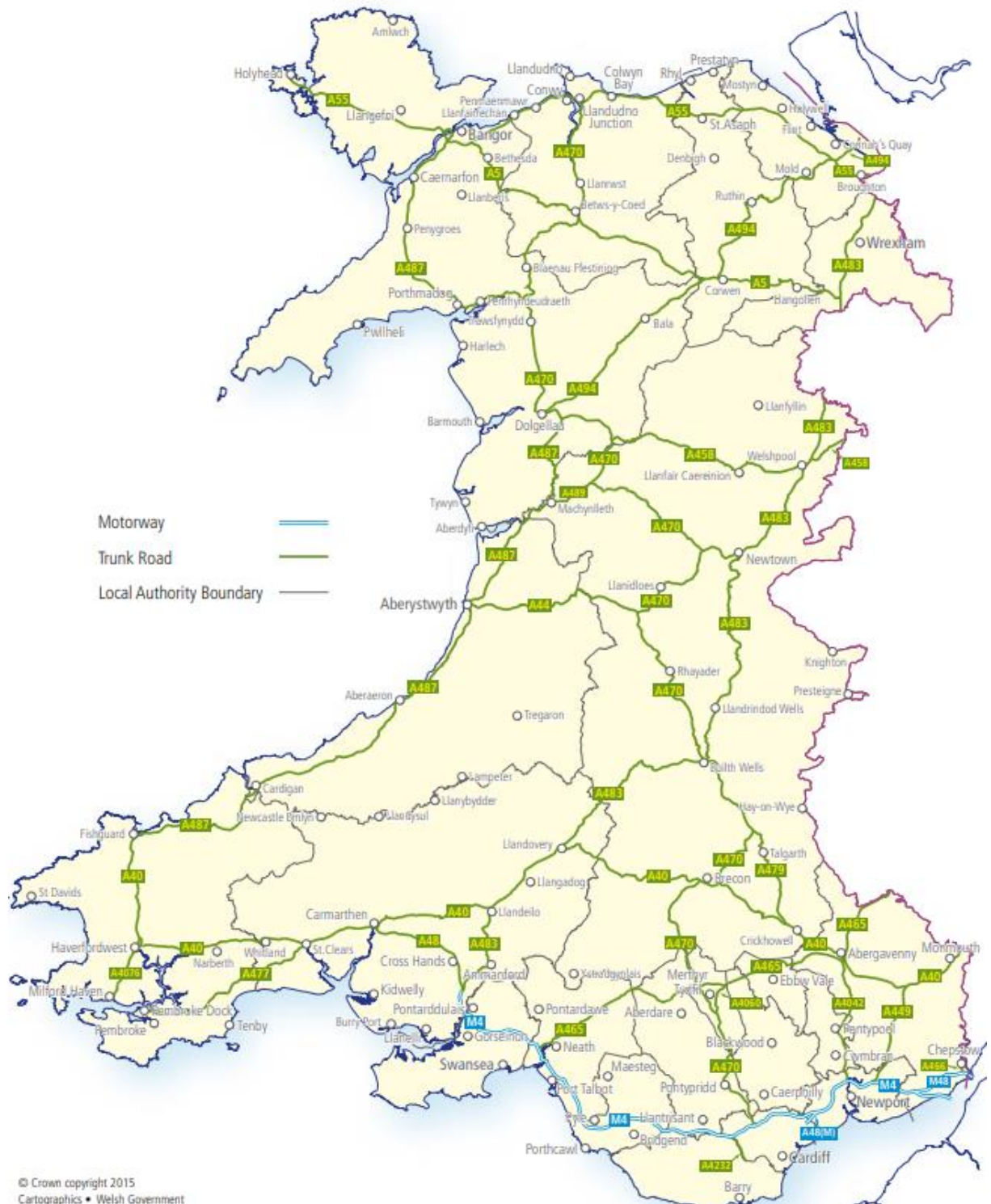


The movement of these types of loads by road is essential for supporting the UK economy, but it is also essential that the movements are carefully planned and executed to ensure they can be safely accommodated by the highway network. Movements of abnormal loads on the Welsh trunk road network (see Figure 1) can include vehicles as large as 8m wide, 55m long and 135te, while many thousand abnormal load movements take place in Wales every year. The consequences of these types of journeys being unplanned or poorly executed can therefore be significant, and include:

- Damage to the network when abnormally wide or heavy loads travel over weak structures or along narrow roads
- Delay to all road users if movement timing or route is poorly planned
- Harm to wider public if mismanaged movement results in an accident

- Delays and cost implications to industry when vehicles unable to complete journey on time

Figure 1 Trunk Road Network Wales (Traffic Wales, 2015)¹



¹ <https://traffic.wales/sites/default/files/2018-10/151021-wales-trunk-roads-map-en.pdf>

To avoid such impacts and their potential legal consequences, those responsible for transporting abnormal loads by road in the UK are required by law to plan and execute each movement in agreement with relevant authorities to ensure the incident-free passage of every load from origin to destination.

Welsh Government is the devolved government for Wales. The Welsh Ministers are the Highway Authority for trunk roads and motorways in Wales under the Highways Act 1980. They are supported by civil servant officials who work across devolved areas that include key areas of public life, including transport and the management of trunk roads and motorways.

This document therefore comprises a Welsh Government Procedure and Advice Guidance (PAG) document which aims to summarise the legal process which must be followed in the planning and execution of all abnormal load movements on trunk roads within Wales and to clarify the roles and responsibilities of the various parties involved.

By pulling together, we make roads in Wales safer and more effective.

1.2 Document structure

The document is structured as follows:

- The legal definition of an abnormal load is discussed in Section 2
- Guidance on vehicle preparation is provided in Section 3
- Guidance on journey preparation is provided in Section 4
- Planning for abnormal loads through the development control process is outlined in Section 5
- A summary of roles and responsibilities is presented in Section 6, and
- A list of useful contacts is provided in Section 7

1.3 Intended audience

This document is primarily addressed at the party responsible for conducting an abnormal load movement on Welsh trunk roads (most commonly the haulier), but is relevant to all parties involved in its safe planning and execution, as follows:

- Consigners/agents
- Hauliers
- Attendants
- Escorting services

- Police
- DVSA
- Highway Authorities and other bridge owners
- Planning authorities
- Developers / agents or consultants
- Statutory utilities

1.4 List of abbreviations

The following abbreviations are used throughout this document:

- AIL – Abnormal Indivisible Load
- ALO – Abnormal Loads Officer
- AWR – Road Vehicles (Authorised Weight) Regulations 1998
- STGO – The Road Vehicles (Authorisation of Special Types) (General) Order 2003
- C&U – The Road Vehicles (Construction and Use) Regulations 1986
- DBFO – Design, Build, Finance, Operate companies
- DMRB – Design Manual for Roads and Bridges
- HA&BO – Highway Authorities and other Bridge Owners
- NH – National Highways (*previously Highways England*)
- DVSA – Driver and Vehicle Standards Agency
- LA – Local Authority
- NMWTRA – North and Mid Wales Trunk Road Agent
- SWTRA – South Wales Trunk Road Agent
- TAA – Technical Approval Authority
- TMP – Traffic Management Plan
- TTRO – Temporary Traffic Regulation Order
- WG – Welsh Government

2 CATEGORIES OF ABNORMAL LOAD

Abnormal loads, and the obligations of those moving them, are defined in the UK by legislation. This section provides a summary of the different legal categories of abnormal load and their implications.

2.1 Normal vehicle definition

The maximum size and weight of vehicles which can use the UK road network without journey notification having to be provided to relevant authorities is defined by the following regulations:

- The Road Vehicles (Construction and Use) Regulations 1986 – “C&U”
- Road Vehicles (Authorised Weight) Regulations 1998 – “AWR”

These permit a vehicle and its load to use UK roads without notification as long as the combination falls within the following maximum size and weight limits:

- Rigid length: up to 18.65m
- Width: up to 2.9m
- Weight: up to 44,000kg
- Axle load: up to 10,000kg (or 11,500kg for single driving axle)

If a vehicle and its load lie outside any of these limits, it is referred to as an abnormal load.

There is no legal height limit for vehicles but, wherever possible, the overall height of a vehicle and load should not exceed 4.95m so that the maximum use can be made of the motorway and trunk road network. This will ensure that loads are less than 5.03m in height, which is the minimum maintained headroom requirement on UK highways.

2.2 Categories of abnormal loads

Legal categories of abnormal load vary to cover different combinations of vehicle size and weight. This is because different types of abnormal load have implications for both:

- Vehicle choice, and
- Route choice

The implications in each case are considered in the following subsections.

2.2.1 Abnormal loads and vehicle choice

The size of an abnormal load has implications for the size of the transporting vehicle, with larger loads generally requiring larger vehicles.

In addition, heavier loads put greater demands on a vehicle's chassis, suspension, tyres, brakes and engine, so heavier abnormal loads also require a higher specification of vehicle.

These distinctions between the impacts of size and weight result in the following abnormal load vehicle legal categories:

- C&U/AWR compliant vehicles are permitted within that legislation to carry oversized abnormal indivisible loads up to a limit, but not overweight loads
- Overweight loads, and those beyond C&U size limits, can be carried by three categories of higher specification vehicles designed to standards prescribed by The Road Vehicles (Authorisation of Special Types) (General) Order 2003 ("STGO") and are subject to lower speed limits depending on load weight
- Loads heavier and/or larger than those permitted by STGO require Special Order approval by the UK Secretary of State under Section 44 of the UK Road Traffic Act 1988

The application of these categories to abnormal load sizes and weights is summarised in the following table.

Table 1 Abnormal load legal category by size/weight combination

Gross weight	Axle weight	Load Dimensions				
		W ≤2.9m L ≤18.65m	W >2.9m L >18.65m	W >4.3m L >27.4m	W >5m L >27.4m	W >6.1m L >30m
≤44,000kg	≤11,500kg	C&U	C&U	STGO Category 1	STGO Category 1	Special Order
>44,000kg	≤11,500kg	STGO Category 1	STGO Category 1	STGO Category 1	STGO Category 1	Special Order
>50,000kg	>11,500	STGO Category 2	STGO Category 2	STGO Category 2	STGO Category 2	Special Order
>80,000kg	>12,500	STGO Category 3	STGO Category 3	STGO Category 3	STGO Category 3	Special Order
>150,000kg	>16,500kg	Special Order	Special Order	Special Order	Special Order	Special Order

Key: = Abnormal load legislation

This table highlights that:

- C&U vehicles are limited to carrying abnormal loads which are oversized but not overweight
- STGO categories increase with abnormal load weight up to 150,000kg
- Special Order vehicles are for extra heavy and/or very large abnormal loads

2.2.2 Abnormal loads and route choice

As well as vehicle type implications, abnormal loads also present route choice implications, as follows:

- The wider and longer a load, the greater the potential for conflict with other road users and roadside furniture / structures
- The heavier a load, the greater the potential for damage to underlying infrastructure and for delays to other road users due to slower speeds

The transporting of abnormal loads therefore presents increased road safety, infrastructure damage and traffic management risks to the network which need careful management and mitigation in liaison with relevant authorities. This is required by legislation covering abnormal load movements and the following table summarises:

- The organisations requiring pre-trip notification of the abnormal load journey details, and
- The minimum notification period in each case, where 'd' refers to working days (excluding Sundays and Bank Holidays) and 'w' refers to weeks

Table 2 Pre-journey notification requirements by abnormal load category

Gross weight	Axle weight	Load Dimensions				
		W ≤2.9m L ≤18.65m	W >2.9m L >18.65m	W >4.3m L >27.4m	W >5m L >27.4m	W >6.1m L >30m
≤44,000kg	≤11,500kg	N/A	Police – 2d			
>44,000kg	≤11,500kg	HA&BO – 2d	Police – 2d HA&BO – 2d		Police – 2d HA&BO – 2d NH – 2w	
>50,000kg	>11,500					
>80,000kg	>12,500		Police – 2d HA&BO – 5d		Police – 2d HA&BO – 5d NH – 2w	
>150,000kg	>16,500kg					Police – 5d HA&BO – 5d NH – 10w

Key:  = Abnormal Load legislation  = VR1 form notice  = C&U
 = STGO C1  = STGO C2  = STGO C3  = Special Order

HA&BO = Highway Authority and other Bridge Owners NH = National Highways

This table highlights that:

- Where just load size increases, only the Police require notification, until the size reaches such that HA&BOs and National Highways require notifying also
- Conversely, where just load weight increases, HA&BOs require notification, until the weight reaches such that the Police and National Highways require notifying also
- For combinations of size and weight increases, both the Police and HA&BOs need notifying, together with National Highways for the largest/heaviest loads
- In all cases, the minimum notification period increases with load size and weight
- For loads over 5m wide, UK Secretary of State approval must be sought through submission of a VR1 form²

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/471962/VR1_form.pdf

- For loads over 6.1m wide, UK Secretary of State approval must be sought through submission of a Special Order form³

The approval of VR1 and Special Order forms has not been devolved by the UK Government to Welsh Government and so currently remains the responsibility of National Highways. However, for Special Order movements which will result in trips on the Welsh trunk road network, and for any other abnormal load movement deemed applicable, Welsh Government may require a Traffic Management Plan (TMP) to be submitted for approval before the proposed journey date. TMP requirements are defined in Section 4.1 below.

VR1 and Special Order load movements should also be planned with due cognisance of Highway England's 'Water preferred policy guidelines'⁴ which require such journeys to be completed as far as possible by either inland or coastal waters wherever it is practical, economic and environmentally desirable to do so.

2.3 Summary

UK law defines abnormal load categories based on the degree of vehicle and route preparation required in each case to ensure a smooth and safe movement, with preparation requirements increasing with load size and weight.

Further guidance on vehicle and route preparation is provided in the following two sections.

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503102/BE16_form_revised_Sept_15.pdf

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799833/WPP_guidelines_2019_DfT_consultation_revision.pdf

3 VEHICLE PREPARATION

Ensuring that an abnormal load vehicle meets legal requirements and is fit-for-purpose is essential for ensuring safe and reliable journeys. This short section is not intended to cover all legal matters relating to abnormal load vehicle preparation but summarises key requirements that contribute to safe movements through Wales.

3.1 Vehicle choice

Where the carrying of a load causes the vehicle and load to lie outside of normal C&U/AWR size and/or weight limits, the party responsible for its transportation is legally required to divide the load into smaller components wherever possible, except where this would involve undue expense or risk of damage.

Assuming the load cannot be further subdivided and so is considered an abnormal indivisible load, the selected vehicle must comply with the legislation applicable to the dimensions and weight of the combination, as set out in Table 1 above.

3.2 Signage, markings and lighting

It is both a legal requirement and best practice to clearly sign, mark and light an abnormal load vehicle to ensure the visibility of vehicle size and extremities for other road users. For a summary of requirements and best practice, refer to the following documents:

- ‘Special types enforcement guide’, by Gov.UK⁵
- ‘Lighting and marking for abnormal loads vehicles code of practice’, by National Highways⁶

3.3 Attendants

Both C&U and STGO legislation require that an attendant travel with the vehicle where:

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it is 3m or less but the length of any lateral projection of a load carried on it exceeds 305mm.

⁵ <https://www.gov.uk/government/publications/lighting-and-marking-for-abnormal-loads-vehicles-code-of-practice>

⁶ <https://www.gov.uk/government/publications/special-types-enforcement-guide/special-types-enforcement-guide#abnormal-loads>

- The overall width of the vehicle together with the width of any lateral projection or projections of any load carried on it exceeds 3.5m where a rigid unit and any projection of the load exceeds 18.75m in length.
- Special types combination exceeds 25.9m, the length of any forward projection of the load exceeds 2m, the length of any rearward projection of the load exceeds 3.05m.

Where attendants are required on special types vehicles and three or more vehicles are involved travelling in convoy, attendants need only be carried in the first and last vehicles of that convoy.

The attendant's duty is to warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road and to ensure road signs and notices are complied with.

3.4 Documentation

If UK Secretary of State approval is required and obtained for the journey via either a VR1 or Special Order form, the approval documents must be carried in the vehicle during the approved journey as the means of demonstrating authorised exemption from C&U/AWR regulations.



4 JOURNEY PREPARATION

The key to an effective and safe abnormal load journey is good preparation in liaison with relevant authorities, as required by legislation and by this document. This section provides guidance on the journey planning and notification process.

4.1 Notification requirements

4.1.1 Authorities to be notified

As summarised in Table 2 above, the relevant authorities who require notification of abnormal load movements may include:

- Police
- Highway authorities and other bridge owners
- National Highways

In Wales, highway authorities comprise:

- Local authorities for non-trunk roads, and
- Welsh Government for trunk roads (with functions delegated to NMWTRA/SWTRA and DBFO companies)

Bridge authorities/owners most commonly comprise:

- Local authorities for non-trunk road structures
- Welsh Government for trunk road structures (with functions delegated to NMWTRA/SWTRA and DBFO companies)
- Network Rail for rail bridges
- Canal and River Trust for canal bridges

4.1.2 Notice periods

Notification to relevant authorities must be provided before any abnormal load journeys take place. The minimum notification periods for each authority are summarised by abnormal load category in Table 2 above. Depending on the type of abnormal load, this shows that:

- Each Police force area traversed by the route must be given at least 2 to 5 days' notice

- Each HA&BO area traversed by the route must be given at least 2 to 5 days' notice
- If VR1 form approval is required, National Highways must be given at least 2 weeks' notice
- If Special Order approval is required, National Highways must be given at least 10 weeks' notice

Where a Temporary Traffic Regulation Order is required, it should be noted that this can also take up to 12 weeks to process (see Section 4.3.1.3 below for more information).

The reason for requiring minimum notification periods is to allow due time for notified authorities to assess the proposed journey and for applicants to satisfactorily address any issues raised before the journey takes place. More information on the notification assessment process is provided in Section 4.3 below, but it should be noted that notified journeys can only legally take place:

- If all relevant authorities are notified with sufficient notice period and either no response is received before the journey date or any response received before the journey date is addressed by the applicant to the satisfaction of the responding authority, and
- In the case of VR1 or Special Order movements, explicit written approval is received

In addition, where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

It is important to note that notifications which do not satisfy the legal minimum notice periods will generally not be accepted by authorities unless a movement is required as part of a genuine emergency and the notification is accompanied by a telephone call. Equally, notifications can be submitted earlier than the minimum notice period, while pre-notifications and consultations with authorities are also encouraged where there is uncertainty about whether a journey notification would be accepted.

4.1.3 Information required

4.1.3.1 Statutory notification requirements

The level of notification information required depends on the category of abnormal load being moved, with information requirements increasing with movement size and/or weight. A summary of requirements per movement category is provided in the following table.

Table 3 Information required by notification type

Information	C&U	STGO	VR1	Special Order
List of authorities notified	☒	☒	☒	☒
Operator details	☒	☒	☒	☒
Movement route, time and date	☒	☒	☒	☒
Description of load	☒	☒	☒	☒
Vehicle type and registration	☒	☒	☒	☒
Vehicle dimensions and laden weight	☒	☒	☒	☒
Axle weights and spacing		☒		☒
Proof of current indemnity to HW&BO		☒		
More detailed journey information			☒	
More detailed vehicle and load information				☒

4.1.3.2 Traffic Management Plan requirements

Where a TMP is required to be submitted to Welsh Government (see sections 2.2.2 and 4.1.2), the following journey details should be provided:

1. Proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
2. Loaded dimension and weight of AIL
3. Anticipated escort arrangements
4. Methodology for managing trunk road traffic during journey, including identification of passing places and holding areas as necessary
5. Journey contingency plans in the event of incidents or emergencies
6. Estimated journey duration and timings along the route
7. Evidence of trial run that mimics the movement of the AIL along the access route where appropriate, at the discretion of the Highway Authority
8. Swept path analysis modelling at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
9. Proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed and reinstated

4.1.4 Notification submission

All relevant notification and indemnity forms can be found on the Gov.UK website⁷ which can be emailed, faxed or posted to relevant authorities.

However, it is recommended that an online notification portal is used to submit C&U and STGO abnormal load notifications. The standard UK system is ESDAL⁸, maintained by National Highways, which allows users to:



- Plan an appropriate route according to vehicle size and weight
- Notify all relevant Police, highway authorities and other bridge owners of the planned journey
- Get advance notice of any possible route problems
- Save vehicle details and routes for future use

Subject to the preferences of individual authorities and Police forces, other online notification portals can also be used, but the applicant should satisfy themselves that any system employed satisfies all legal requirements for making abnormal load journey notifications.

The TMP, if required, should be submitted to the Welsh Government ALO, as detailed in Table 7 below.

4.1.5 Notification dispensations

Dispensations may be issued by Police to hauliers to move abnormal loads through their area without prior notification if they satisfy the following requirements:

- Abnormal loads no wider than 3.5m
- Multiple loads of a like nature on a regular basis
- Routes limited to motorways and selected A roads only

The granting of a dispensation has the potential to significantly reduce the number of notifications hauliers will have to submit. However, the dispensation should reference specific vehicles in the fleet and so are not transferable without prior notice to the Police. Drivers should also carry a copy of the dispensation and present it to an officer on request. Dispensations must be renewed annually on application and are not automatically renewed.

⁷ <https://www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms>

⁸ <https://www.gov.uk/esdal-abnormal-load-notification>

Any dispensation granted will not take account of any roadworks commencing during the dispensation period or ongoing at the point of issue and hauliers will still be expected to check their route.

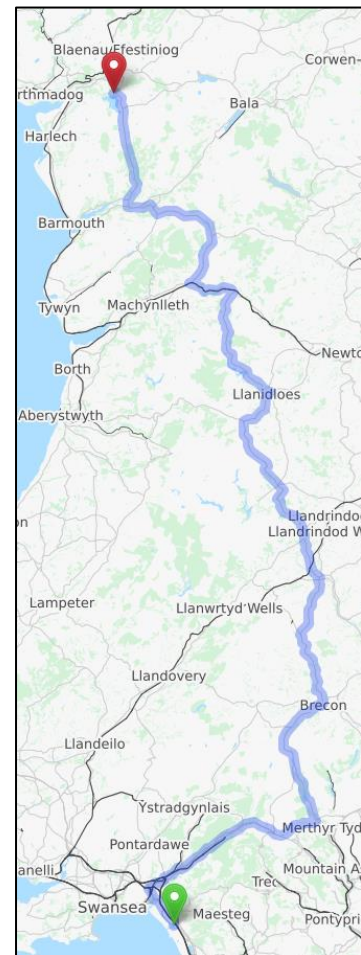
4.2 **Route planning guidance**

4.2.1 **General principles**

It is ultimately the haulier's responsibility to identify a route and execute a journey which ensures the legal, safe and least disruptive passage of an abnormal load from trip origin to trip destination. Relevant authorities will provide guidance and, where necessary, require journey amendments, but the legal responsibility and liability for the safe completion of each journey lies with the haulier.

In selecting an appropriate route for inclusion in an abnormal load journey notification, the following general principles should be followed:

- Routing preference should always be given to using the highest classification roads, with as much of the journey as possible being routed along motorways, trunk roads and A-roads. These routes are best equipped to carry large and heavy loads, and are least likely to present size and weight restrictions (the busiest abnormal load routes on the Welsh trunk road network typically include the A55, A494 dual carriageway, A483 dual carriageway and the A5 near Chirk)
- Routes should also avoid passing through population centres wherever possible to minimise conflict with both infrastructure constraints and other road users
- Routes must avoid roads presenting size and/or weight restrictions which fall within the parameters of the vehicle/load combination being transported
- One key advantage of using online journey notification systems like ESDAL is that it allows users to plot a route based on vehicle size and weight based on mapping which contains information on network size and weight restrictions.



Potential applicants should also be aware of Ordnance Survey 'Mastermap Highways Network' products which allow point-to-point route planning and contains a comprehensive and continuously updated national database of:

- Road classification and name
- Height, weight, width and length restrictions
- Turn restrictions
- Access restrictions
- Locations of bollards and traffic calming
- Narrow roads and pinch points
- Maintenance responsibility

In addition, it is recommended that applicants consider potential planned roadworks at the route planning stage using the online resources detailed in Section 4.4.1 below.

In combination with online notification portals, hauliers therefore now have access to route planning tools which maximise the chances of both successful abnormal load notifications and successful abnormal load journeys.

4.2.2 Other considerations

4.2.2.1 Travel timing

In planning an abnormal load route, the following timing related factors should also be considered:

- Journey times which exceed statutory driver working time limits will require a stopping place to be identified along the route which can accommodate abnormal load vehicles
- Journey distances which require vehicle refuelling will require a fuel station to be identified along the route which can accommodate abnormal load vehicles
- During hours of darkness, most Police forces only allow abnormal load movements to take place on motorways and on some lit dual carriageways. Journeys on all other road types which cannot be completed during daylight hours will therefore need to be routed via an abnormal load layby where layover can take place
- Some authorities will not allow abnormal load movements through their area or parts of their area during peak traffic hours. This can affect both route choice and journey timing

For planning stops and/or refuelling, National Highways publish on the Gov.uk website a list⁹ and map¹⁰ of laybys and motorway service stations which can accommodate abnormal loads.

In calculating journey times, typical congestion on the planned day of travel should be taken into account, as well as the speed limit applicable to the abnormal load vehicle type. STGO loads are speed limited by category and road type. The most common categories are limited as follows:

Table 4 STGO speed limits by category and road type

STGO category	Speed limit		
	Motorway	Dual carriageway	Other roads
Category 1 (width ≤ 4.3m)	60mph	50mph	40mph
Category 1 (width > 4.3m) & Categories 2 & 3	40mph	35mph	30mph
Special Order ¹¹	20mph	20mph	20mph

Source: Special Types Enforcement Guide

4.2.2.2 Escort considerations

Consideration should also be given during route planning as to whether either a private or Police escort is required to accompany the abnormal load movement.

There is no legal requirement for a vehicle moving under STGO or a Special Order to be accompanied by an escort vehicle, but National Highways advises that the following dimensions may be applied to decide if the movement of an abnormal load requires an escort:

Table 5 National Highways guidelines on escort requirements

Abnormal load measurement	Motorway	Other
Width	>4.6m	>4.1m
Length	-	>30.5m
Weight	130t	100t

Source: Lighting and marking COP for abnormal load self escorting vehicles, National Highways

The above measures are for guidance and may differ between individual Police forces who may wish to vary these requirements. The final decision rests with the Police (see Section 4.3.1.2 below).

See the full National Highways Code of Practice¹² for further details on escorting abnormal load movements.

⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494606/Location_of_Abnormal_Load_Laybys_-_1143.pdf

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/494607/Lay-by_and_MSA_Map_-_1143.pdf

¹¹For girder frame trailers over 150 tonnes and draw-bar trailers over 250 tonnes, the limit is 12mph

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503105/Lighting_and_marking_COP_for_abnormal_load_self_escorting_vehicles_HE_rebranding_v1.pdf

4.3 Notification processing

4.3.1 Police notification assessment process

4.3.1.1 Public Safety Risk Assessment

In processing an abnormal load journey notification, the primary concern of the Police is to assess the potential impact of the journey on public safety. The relevant duty officer within the Police will therefore check the notification and carry out a risk assessment based on the agreed 'risk category' levels set out below:

- Low risk notifications – no necessity for further action. General advice provided to the haulier and information on control measures if necessary.
- Medium risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered medium risk.
- High risk notifications – the Police will check the movement complies with relevant legislation and inform the haulier if the notification is rejected. A decision on the necessity of a Police escort or further traffic management measures will be considered for all notifications considered high risk.

Based on this risk assessment, the Police forces may reject or amend any time, date or route that they consider may have an impact on public safety. If a route is deemed unsuitable, the haulier will be notified and will then be responsible for identifying an alternative route or additional traffic management measures sought from local authorities, National Highways or the Police.

4.3.1.2 Escort requirements

If the risk assessment determines that the safety of road users may be compromised to an unacceptable extent, an escort may be specified regardless of the vehicle dimensions specified in Table 5 above. The haulier will therefore be responsible for provision of an escort vehicle which conforms to the type specified by National Highways.

As per ACPO guidance, Police escorts will only be provided if specifically requested by a haulier or if the risk assessment identifies the need for temporary road closures to ensure safe passage of the load through restricted sections of the route. A minimum of 8 days notice will be required for a Police escort. If necessary, charges for Police escorts will be incurred by the haulier at 'Special Policing



Services' rates. For journeys where a TMP has been requested by Welsh Government, Welsh Police forces can request evidence of TMP approval before providing escort support services.

4.3.1.3 Temporary Traffic Regulation Order

If the risk assessment identifies the need for a temporary road closure on any section of the route, the haulier will be required to apply for a Temporary Traffic Regulation Order (TTRO) under the Road Traffic Regulation Act 1984 to allow officers and other Accredited Persons¹³ to stop and direct moving traffic or to suspend on-street parking. Applications for TTROs on the non-trunk road network should be made through the relevant local authority, and through NMWTRA/SWTRA for trunk road applications.

Hauliers should be advised that TTROs can take up to 12 weeks to process.

4.3.2 HA&BO notification assessment process

In processing an abnormal load journey notifications, the primary concern of highway authorities and other bridge owners is to assess the potential impact of the journey on highway structures.

4.3.2.1 Check for height and width restrictions

On receipt of a notification or notification enquiry, the Abnormal Loads Officer (ALO) for each of the affected HA&BOs will use details of the vehicle configuration to undertake audit checks of known height and width restrictions at structures along the route, and any other known structural constraints (temporary or permanent). Alternative routes or configurations may be suggested to avoid any identified structural constraints.

The ALO may request the haulier or enquiring party provides horizontal and/or vertical swept path analysis as necessary, based on topographical survey data. If the submitted swept path analysis is considered inadequate, the ALO may request the haulier or enquiring party undertakes a trial run to mimic the movement of the abnormal load vehicle through the constraint. The trial run vehicle should demonstrate the extent of the load envelope in terms of width and height in a clearly visible manner using a collapsible template. It should be noted that this may require a Police escort.

If the ALO is not satisfied that the constraint can be negotiated by the load, the HA&BO shall inform the haulier or enquiring party, as well as other relevant authorities as appropriate, that the load cannot be moved. WG can also implement Permanent or Temporary Traffic Regulation Orders under the Road Traffic Regulation Act 1984 to limit the maximum gross vehicle weight on a structure if required.

¹³ The Police Reform Act allows DVSA and other agencies to use Policing Powers to be able to replace officers at planned events, under the provisions of the Community Safety Accreditation Scheme (CSAS), as long as they are "employed" by the Accredited Agency to do so.

4.3.2.2 Check for structural capacity

On receipt of a notification or notification enquiry, the ALO will undertake checks referring to existing structural certification along the notified route, in consultation with the HA&BO's structures team if necessary, based on the loading and vehicle configuration.

If checks identify structures which may not be able to carry the load, the haulier may suggest an alternative route which will then need to be submitted to the relevant HA&BO for approval.

Further checks will be undertaken if an alternative route cannot be found. This will be undertaken by the ALO or a structural engineer. If these checks identify structures which would not be able to carry the load, the haulier may propose alternative vehicle configurations until a suitable configuration is found.

If neither a suitable route nor suitable vehicle configuration can be found and the HA&BO rejects the proposal to move on this basis, then the haulier may commission the assessment of route structures by a suitably qualified and experienced consultant at their own expense. All load assessments require Technical Approval according to BD2, 'Technical Approval Of Highway Structures'¹⁴. WG are the Technical Approval Authority (TAA) for Trunk Roads in Wales.



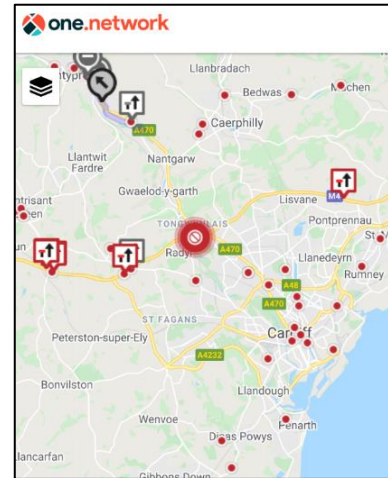
¹⁴ <https://www.croftse.co.uk/wp-content/uploads/2018/04/BD2-12-Highways-Structures-Approval.pdf>

4.4 Post-notification considerations

4.4.1 Roadworks and disruptions

The haulier should check for roadworks and disruptions along the route on the day of travel before commencing an agreed journey. Roadworks can particularly affect the passage of wide loads, and national details of live roadworks can be checked at <https://one.network/> or at <https://traffic.wales/> (also see Section 7 for Traffic Wales' contact details).

The haulier should consult in advance with the relevant ALO and the party responsible for the works if there is any doubt about whether the works affect the agreed route for the journey.



In the event where roadworks make the agreed route impassable, an agreement should be reached with the party responsible for the works to make passage possible at an agreed time, if feasible.

If not feasible, or if an unforeseen disruption makes a section of the agreed route impassable, the haulier is expected to assess where it is most appropriate and safe to park up and to contact the Police. If there are no safe areas then traffic management may be required to safely control traffic around the abnormal load vehicle. In addition to Police contact details, all hauliers are also recommended to carry contact details of the relevant local highway authorities and national traffic management firms to aid swift action in case of such an event.

4.4.2 Enforcement considerations

Once in transit, abnormal load vehicles can be subject to enforcement checks by either Police or DVSA officers. The vehicle may be escorted to a safe stopping place if any of the following conditions are met:

- Police have not received notification of movement
- Notification of movement is invalid due to inaccuracies
- Movement is not taking place in accordance with approved notification or authorised amendments
- Abnormal Indivisible Load vehicle or load is incorrectly marked or lit
- Abnormal Indivisible Load vehicle does not have the required attendant

- Abnormal Indivisible Load vehicle does not have the escort vehicle required by Police
- Driver is currently committing a 'driving hours' offence under tachograph regulations or will have committed an offence before reaching next stopping point
- Driver is currently committing an 'insufficient rest' offence under tachograph regulations
- Any C&U offences not exempted by STGO 2003 are evident

Where non-compliance is evident, the driver and operator are liable to prosecution under C&U regulations. Penalties for non-compliance can range from a fine¹⁵ to the temporary restriction or suspension of the haulier's operating licence by the Traffic Commissioner for Wales¹⁶. Officers might also prevent onward travel of the vehicle until any areas of non-compliance are adequately addressed.

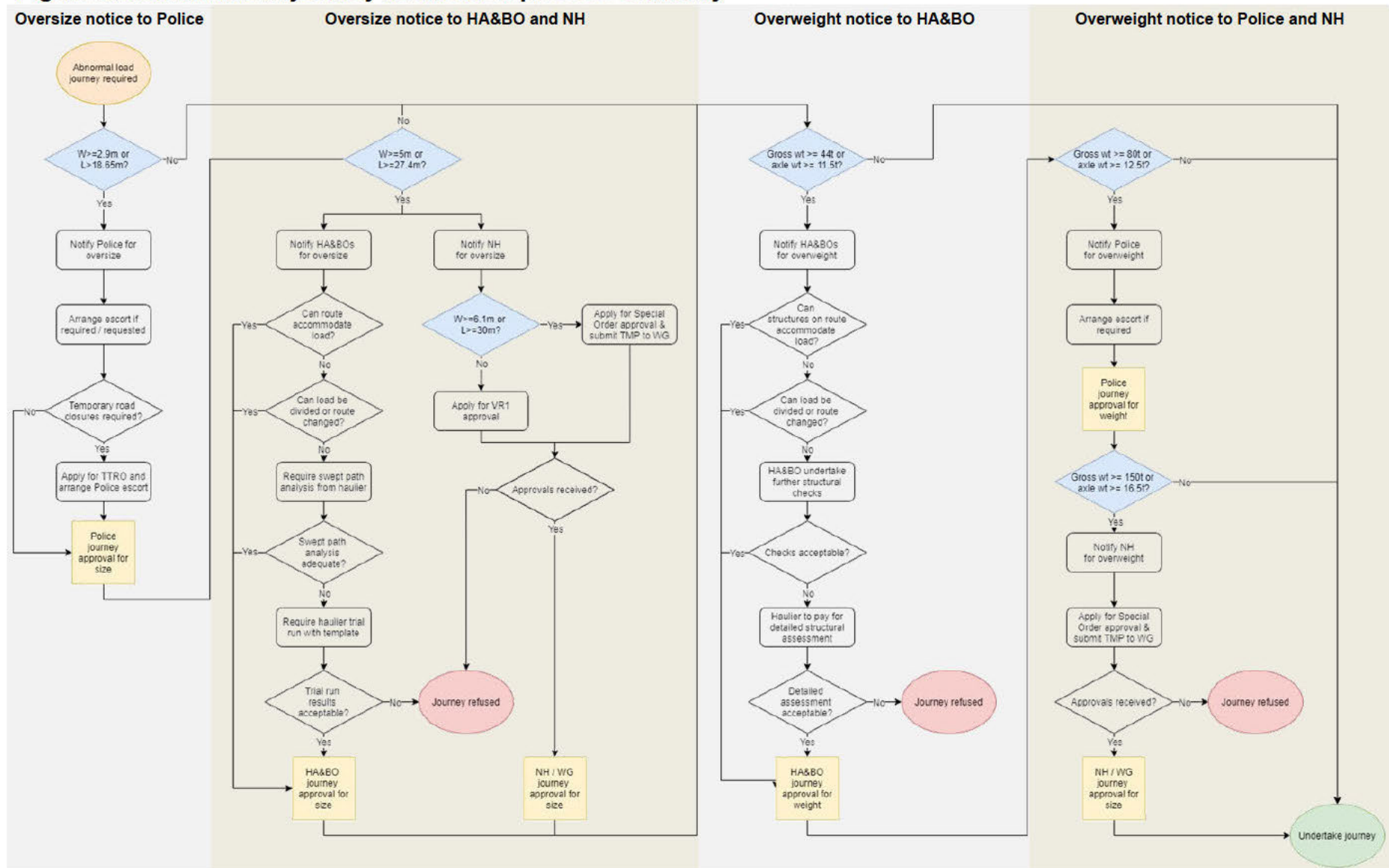
4.5 Process summary

A summary of the main steps in the legally required notification process is shown in the following figure.

¹⁵ <https://www.gov.uk/government/publications/guide-to-graduated-fixed-penalties-financial-deposits/dvsa-roadside-checks-fines-and-financial-deposits>

¹⁶ <https://www.gov.uk/traffic-commissioner/decision-and-penalties>

Figure 2 Abnormal load journey notification process summary



5 ABNORMAL LOADS AND DEVELOPMENT CONTROL

5.1 Planning applications

Planning applications for developments which are likely to generate abnormal load movements, either during construction or operation, may be required to be submitted with a Transport Assessment in accordance with Welsh Government Planning Policy Technical Advice Note 18: Transport¹⁷ Regarding abnormal load movements, the Transport Assessment should identify:

- Estimated movement volumes of abnormal loads to and from the site
- The most appropriate abnormal load routes to and from the site
- Mitigation proposals where necessary for route to safely accommodate load

Failure to demonstrate that the site can be safely accessed by the loads it will generate can be grounds for refusal of planning permission.



5.2 Planning conditions

Where planning permission is granted for a development which will generate abnormal load movements on the Welsh trunk road network, the following planning conditions will be attached.

¹⁷ <https://gov.wales/sites/default/files/publications/2018-09/tan18-transport.pdf>

5.2.1 Structural assessment

No on-site development works shall be undertaken until:

- a. an assessment of the capacity and impact on all structures along those parts of the highway network which shall be utilised during the construction of the development including bridges, culverts, retaining walls, embankments, and
- b. details of any improvement works required to such structures as a result of construction of the development

have been submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The required improvement works identified in the assessment shall be completed prior to the commencement of any Abnormal Indivisible Load (AIL) deliveries to the development site.

5.2.2 Condition surveys

Condition surveys of all highway features along those parts of the highway network which shall be utilised during the construction of the development shall be undertaken prior to, during and on completion of the construction phase of the development. The survey reports shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) within 28 days of the surveys.

5.2.3 Liability for incidental damage

Prior to the commencement of development works, a scheme to provide for the remediation of any incidental damage directly attributable to the development to the parts of the highway network which will be utilised during the construction of the development including street furniture, structures, highway verge and carriageway surfaces shall be submitted to and approved by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The scheme shall be implemented as approved throughout the construction phase of the development.

5.2.4 Traffic Management Plan

AILs associated with the development shall be delivered strictly in accordance with a Traffic Management Plan (TMP) as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any works. The TMP shall include:

- a. proposals for transporting AILs from their point of entry to the Welsh trunk road network to the site that minimise any impact on the safety and free flow of trunk road traffic
- b. evidence of trial runs that mimic the movement of the worst case AILs along the access route where appropriate, at the discretion of the Highway Authority
- c. number and size of AILs, including loaded dimensions and weights
- d. number and composition of AIL convoys, including anticipated escort arrangements
- e. methodology for managing trunk road traffic during AIL deliveries, including identification of passing places and holding areas as necessary
- f. convoy contingency plans in the event of incidents or emergencies
- g. estimated convoy journey durations and timings along the route, including release of forecast traffic queues
- h. swept path analysis modelling the movement of the worst case AILs at all potential horizontal and vertical constraints along the access route where appropriate, at the discretion of the Highway Authority
- i. proposals for the temporary or permanent modification of any affected street furniture along the access route and details of how this would be managed
- j. plans for the reinstatement of any temporary works after completion of the construction phase
- k. land ownership must be clarified on all drawings showing proposed highway modifications. The developer shall be responsible for the acquisition and reinstatement of all third party land including re-instatement of boundary features
- l. proposals to liaise with all relevant stakeholders and members of the public regarding construction traffic and AIL movements
- m. consideration of the cumulative impact of other abnormal load generating schemes proposing to use all or part of the same access route

AILs associated with the maintenance and decommissioning of the development shall leave the site strictly in accordance with a TMP as shall be agreed with the relevant highway authority. In this respect, the TMP shall be submitted to and approved in writing by Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate) prior to the commencement of any removal, replacement of decommissioning works.

5.2.5 Highway works

No development works shall be undertaken until full details of any highway works associated with the construction of layover areas, passing places and highway improvements as agreed with each relevant highway authority including:

- a. the detailed design of any works
- b. geometric layout
- c. construction methods
- d. drainage, and
- e. street lighting

have been submitted to and approved in writing by the local planning authority following consultation with the Welsh Government as Welsh trunk road highway authority or other relevant highway authority (as appropriate). The highway works shall be completed in accordance with the approved details prior to the commencement of any AIL deliveries to the development site.

No development works shall be undertaken until the developer demonstrates rights of access to all proposed works that are not part of the highway network to the satisfaction of the local planning authority.

5.2.6 Road Safety Audit

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 119¹⁸. 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.

5.2.7 Section 278 Agreement

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

¹⁸ <http://bailey.persona-pi.com/Public-Inquiries/M4-Newport/C%20-%20Core%20Documents/6.%20Transport%20and%20Engineering/DMRB/vol5/section2/hd1915.pdf>

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 1980¹⁹.

5.2.8 Access onto the trunk road

Full details of the highway works associated with the proposed new access onto the trunk road shall be submitted by the applicant to WG, as the Welsh trunk road highway authority, prior to the commencement of any works on the development site. Details of proposed highway works should be as indicated on the submitted plans including the detailed design, geometric layout, construction and drainage.

The visibility splays shown on the submitted plans of the proposed new access onto the trunk shall at all times be kept free of any 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 DMRB.



¹⁹ <https://gov.wales/sites/default/files/publications/2018-04/109-18-section-38-184-and-278-agreements-under-the-highways-act-1980.pdf>

6 SUMMARY OF ROLES AND RESPONSIBILITIES

The roles and responsibilities for each party set out in this document are summarised in the following table.

Table 6 Summary of roles and responsibilities of parties involved in abnormal load movements

Party	Role	Responsibilities
Consigners/agents	Generating/commissioning abnormal load movement	Commissioning of fully compliant haulier for planning and executing abnormal load movements. Preference should be given to hauliers with FORS accreditation (see https://www.fors-online.org.uk/cms/)
Haulier	Preparing and executing abnormal load movement	- Planning subdivision of loads wherever possible to avoid need for abnormal load movements (see Section 3.1) - Ensuring selected vehicle complies with the legislation applicable to the dimensions and weight of the combination (see Table 1) - Ensure vehicle and load is clearly signed, marked and lit according to regulations (see Section 3.2) - Ensure attendants accompany vehicle if required (see Section 3.3) - Carry VR1 or Special Order documents in vehicle where applicable (see Section 3.4) - Notify relevant authorities of abnormal load journey with sufficient notice period, including a Traffic Management Plan if required (see Section 4.1.2) - Address and, if necessary, pay for any requirements emerging from notification assessment process (see Section 4.3) - Undertake/procure structural assessment if required (see Section 4.3.2.2) - Accommodate for roadworks and disruptions on day of travel (see Section 4.4.1) - Execute journey according to approved notification (see Section 4.4.2) and, where applicable, to approved Traffic Management Plan (see Section 2.2.2)
Abnormal load attendant	Accompanying abnormal load on journey where required	- Accompany abnormal load vehicle for full journey where legislation requires - Warn the driver or any other person of any danger likely to be caused by the presence of the vehicle or vehicles on the road (see Section 3.3)
Abnormal load escort	Escorting abnormal load on journey where required	- Comply with National Highways guidance in vehicle preparation and abnormal load escort protocol (see Section 4.2.2.2) - Comply with any specific instructions provided by Police (see Section 4.3.1.2)
Police	Assessing public safety impacts of abnormal load notifications, escorting where required and enforcing regulations in transit	- Undertake public safety risk assessment for all abnormal load notifications (see Section 4.3.1.1) - Advise haulier with sufficient notice if any amendments required to notified journey or if notification refused (see Section 4.3.1.1) - Advise haulier with sufficient notice if private or Police escort required and if TTRO required (see Section 4.3.1.2 and 4.3.1.3) - Resource the Police escort, as required (see Section 4.3.1.2) - Enforce abnormal load regulations in transit for public safety (see Section 4.4.2)
DVSA	Vehicle standards, licencing and enforcement	Enforce abnormal load regulations in transit for public safety (see Section 4.4.2)
HB&BOs	Assessing infrastructure impacts of abnormal load notifications	- Assess relevant journey notifications in terms of capacity of route infrastructure to accommodate proposed abnormal load dimensions and weight (see Section 4.3.2) - Advise haulier if journey notification is rejected or approved (see Section 4.3.2 Error! Reference source not found.)
Planning authorities	Determining planning applications for abnormal load generating developments	- Ensure planning applications consider abnormal load trip generation and demonstrate suitable routeing and, where necessary, mitigation (see Section 5.1) - Apply planning conditions where necessary to ensure abnormal load routes are fully planned and approved and that all journeys are undertaken according to an approved Traffic Management Plan (see Section 5.2)
Developers	Seeking planning consent for abnormal load generating developments	- Submit Transport Assessment with planning application to identify abnormal load trip generation, suitable routeing and, where necessary, mitigation (see Section 5.1) - Discharge planning conditions, where applicable, by ensuring abnormal load routes are fully planned and approved and by committing to all journeys being undertaken according to an approved Traffic Management Plan (see Section 5.2)

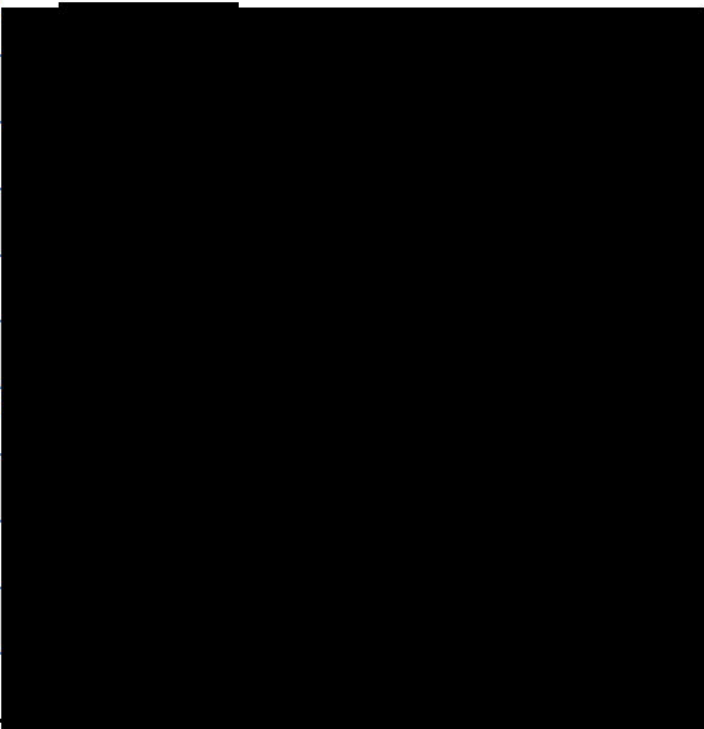
7 USEFUL CONTACTS

The process outlined in the above sections requires input from and contact with a number of organisations in order to ensure all relevant authorities are notified, and that abnormal load movements occur safely and without causing disruption to the network.

The following table provides a list of key contacts and contact details for queries associated with the movement of abnormal loads in Wales.

Table 7 Useful contacts for abnormal load related queries

Organisation	Contact details
Welsh Government ALO	[REDACTED]
Dyfed-Powys Police	[REDACTED]
Gwent Police	[REDACTED]
North Wales Police	[REDACTED]
South Wales Police	[REDACTED]
NMWTRA	[REDACTED]
SWTRA	[REDACTED]
Traffic Wales	[REDACTED]
National Highways Abnormal Loads Team	[REDACTED]
Network Rail Abnormal Loads Team	[REDACTED]
Blaenau Gwent County Borough Council	[REDACTED]
Bridgend County Borough Council	[REDACTED]
Caerphilly County Borough Council	[REDACTED]
Cardiff City & County Council	[REDACTED]
Carmarthenshire County Council	[REDACTED]
Ceredigion County Council	[REDACTED]
Conwy County Borough Council	[REDACTED]
Denbighshire County Council	[REDACTED]
Flintshire County Council	[REDACTED]
Gwynedd County Council	[REDACTED]
Isle of Anglesey County Council	[REDACTED]

Organisation	Contact details
Merthyr Tydfil County and Borough Council	
Monmouthshire Council	
Neath Port Talbot County Borough Council	
Newport City Council	
Pembrokeshire County Council	
Powys County Council	
Rhondda Cynon Taf County Borough Council	
Swansea Council	
Torfaen County and Borough Council	
Vale of Glamorgan Council	
Wrexham County Borough Council	

DfT regulations - Form of Notice to Police (Construction and Use Regulations (C & U) 1986 & the Road Vehicles (Authorisation of Special Types) (General) Order (STGO), 2003 Schedule 5 or Schedule 9 Part 1) and to Highway and Bridge Authorities (STGO)

(Subject to the prior agreement of each of the authorities to which this notice is sent, it may be used to give notice of additional journeys, different vehicles, routes and destinations.)

1. General Details:

List of all Police Forces, Highways and Bridge Authorities to which this form is being sent.

Select and copy the list of Police Forces, Highways and Bridge Authorities by [clicking here](#). Then, paste the list generated into the box below*.

'paste' Police Forces, Highways and Bridge Authorities to which this form is sent here

Once this form is complete send to notifications@esdal2.com

Fields marked with an "*" are mandatory

Company/Organisation Name*: Your company/organisation name	Company/Organisation Address*: Your company/organisation address
Contact Name*: Person to be contacted in case of queries	
Other contact details.: Other contact details (optional)	
Email Address*: Email address of named contact	Telephone No.*:
Operator Licence No.*: Operator Licence No.	Operator Reference No.: Operator reference no. (optional)
On Behalf Of (Name of haulier for whom the notification is being submitted) If being completed by an agent on behalf of a haulier (optional)	
Load Description*: Description of the load	
No. Of Loads*:	
Notes: Add notes for the Police, Highways and Bridge Authorities (optional)	

2. Route Details:

Movement Start Date and Time*: 	Movement End Date and Time*:
Movement From Address*: name/number, street name, town/city, country 	Movement To Address*: name/number, street name, town/city, country
From Address Postcode: E.g. CF12 3AB	To Address Postcode: E.g. CF12 3AB
Route Description: Describe the proposed route 	
Tick to confirm you have an indemnity: ☐	Include Return Leg: ☐
Return Leg Description (If different to the outward route) (optional): Describe the proposed return leg route 	

Note: To provide additional detailed route information complete section '4. Additional Information'.

3. Vehicle Details: Movement Classification*: Select movement classification

Vehicle Type*: Select vehicle type

Configuration*: Select configuration

All dimensions are to be entered in metres/kilograms (where applicable).

VR1 No. (Applicable for VR1)	Applicable for VR1 notifications only	Special Order No. (Applicable for Special Order)	Applicable for Special Order notifications only
Registration no. of motor vehicle or substitute(s)* <i>(Multiple registration numbers to be separated with comma (,))</i>	Registration number/s of vehicle/s or substitute/s 	Max. Height*	m
Overall/total length of vehicle*	m	Reducible Height	m
Rigid Length*	m	Gross Weight*	kg
Projection Front*	m	No. Of Axles	
Projection Rear*	m	No. Of Wheels	
Overall Width*	m	Max Axle Weight	kg
Projection Left*	m	No. Of Vehicle Components* <i>(Including Tractor and Trailers)</i>	
Projection Right*	m		

3.1 Vehicle Axle Details (not required for C&U vehicles)

Tractor/ Trailer	Select....	Select....	Select....	Select....	Select....	Select....	Select....	Select....
No. Of Wheels								
Max. Axle Weight (in Kilograms)								
Dist. To Next Axle (Axle spacing in Metres)								

Note: To provide additional 'Vehicle Axle Details' complete the section below.

3.2 Additional Vehicle Axle Details (not required for C&U vehicles)

Tractor/ Trailer	Select....	Select....	Select....	Select....	Select....	Select....	Select....	Select....
No. Of Wheels								
Max. Axle Weight (in Kilograms)								
Dist. To Next Axle (Axle spacing in Metres)								

Tractor/ Trailer	Select....	Select....	Select....	Select....	Select....	Select....	Select....	Select....
No. Of Wheels								
Max. Axle Weight (in Kilograms)								
Dist. To Next Axle (Axle spacing in Metres)								

Tractor/ Trailer	Select....	Select....	Select....	Select....	Select....	Select....	Select....	Select....
No. Of Wheels								
Max. Axle Weight (in Kilograms)								
Dist. To Next Axle (Axle spacing in Metres)								

4. Additional Information – Please provide any additional information to assist the Police Force, Highways and Bridge Authorities to which this form is sent below;

Points through which the route travels.

Address: Address should be in the format <Address>, <PostCode>

E.g.: BANBURY ROAD, CV35 0AA

Or

Highways England, Quinton Business Park, 3 Ridgeway, Quinton, Birmingham, B32 1AF

Co-ordinates: This should be British National Grid(BNG) Easting and Northing co-ordinate to refer a point on the map. The BNG co-ordinate value can be retrieved from <https://gridreferencefinder.com> E.g.: 455090,228177

Either address or co-ordinates must be present. Giving co-ordinates is always the most accurate information for a route.

[illegible]

Georgia Peters
Planning Officer
Planning and Environment Decisions Wales
Welsh Government

Date: 30/05/2024
Our Ref: PLA0080056
Your Ref: CAS-03094-T7D9G0

Dear Madam,

Grid Ref: SN651501 265204 250206

Site: Lan Fawr Energy Park, Carmarthenshire

Development: A 132kV overhead line connection from the proposed Lan Fawr Energy Park to a proposed new substation near Carmarthen

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

Further to your consultation under regulation 33(7) of the 2017 Regulations. We welcome the opportunity to comment on the proposal and would offer the following standing advice which should be taken into account within any future application:

SEWERAGE / SEWAGE TREATMENT

It appears the application does not propose to connect to the public sewer, and therefore Dwr Cymru Welsh Water has no further comments. However, should circumstances change and a connection to the public sewerage system/public sewage treatment works is preferred we must be re-consulted on this application.

WATER SUPPLY

We acknowledge a water supply for this proposed development will not be required. However, should circumstances change, please contact our Developer Services Team on 0800 917 2652.

ASSET PROTECTION

The proposed route of the A 132kV overhead line connection from the proposed Lan Fawr Energy Park to a proposed new substation near Carmarthen, is crossed by public sewers and watermains.

Under Section 159 of the Water Industry Act 1991, Dwr Cymru Welsh Water has rights of access to its apparatus at all times, and as such would require an easement of 3m either side of the centreline of the apparatus.

Should the proposed development be located within the protection zones of the sewer and watermain crossings, there would be a requirement to divert the public sewer or watermain, which can be applied for under Section 185 of the Water Industry Act 1991, the cost of which will be re-charged to the developer. The developer must consult Dwr Cymru Welsh Water before any development commences on site. I enclose our Conditions for Development near Watermain(s).

Please see below list of grid references, where our apparatus is located:

261439, 249218 – water
258797, 246207 – water
258277, 246069 – water
257016, 244418 – water
256789, 244127 – water
255359, 243949 – water
253984, 243245 – water & sewer
252692, 242290 – water
251575, 241618 – water
250477, 241413 – water
249706, 240929 – water
248255, 239940 – water
248053, 238830 – water
246973, 236973 – water
246006, 235911 – water & sewer
245649, 234544 – water
244632, 226741 – water
244427, 225995 – water & sewer
245575, 221130 – water
245637, 220175 – water
244879, 218488 – water
242745, 216233 – water



Welsh Water is owned by Glas Cymru – a not-for-profit company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni nid-er-elw.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

If you have any queries please contact the undersigned on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,

Clare Powell
Development Planning Officer
Developer Services



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Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni nid-er-elw.

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Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

PLA0080056

Conditions For Development Near Water Mains

Location: **: Lan Fawr Energy Park, Carmarthenshire**

Date: 30.05.2024

The development of the site with our water main located as shown on the attached plan will involve certain conditions which must be strictly adhered to. These are:-

1. No structure is to be sited within a minimum distance of **5 meters** from either side of the centre line of the water mains. The pipeline must therefore be located and marked up accurately at an early stage so that the Developer or others understand clearly the limits to which they are confined with respect to the Company's apparatus. Arrangements can be made for Company staff to trace and peg out such water mains on request of the Developer.
2. Adequate precautions are to be taken to ensure the protection of the water main during the course of site development.
3. If heavy earthmoving machinery is to be employed, then the routes to be used in moving plant around the site should be clearly indicated. Suitable ramps or other protection will need to be provided to protect the water main from heavy plant.
4. The water main is to be kept free from all temporary buildings, building material and spoil heaps etc.
5. The existing ground cover on the water main should not be increased or decreased.
6. All chambers, covers, marker posts etc. are to be preserved in their present position.
7. Access to the Company's apparatus must be maintained at all times for inspection and maintenance purposes and must not be restricted in any way as a result of the development.
8. No work is to be carried out before this Company has approved the final plans and sections.

These are general conditions only and where appropriate, will be applied in conjunction with specific terms and conditions provided with our quotation and other associated documentation relating to this development.

From: Shirley Rance on behalf of [NSIP Applications](#)
To: [PEDW – Seilwaith / Infrastructure](#)
Cc: [NSIP Applications](#)
Subject: DNS- EIA Scoping Direction Consultation for DNS CAS-03094-T7D9G0 - Green GEN Towy Teifi Grid Connection - HSE Response dated 28/5/24
Date: 28 May 2024 14:26:59

Dear Ms Peters,

Thank you for your email dated 9 May 2024 consulting HSE on the Proposed Green GEN Towy Teifi Grid Connection - Development of National Significance (DNS).

Please find HSE's advice below.

HSE's land use planning advice

1. With reference to the plans **Preferred Route Sections 1- 4** and **Section 5 North & South** (inclusive) found in **[2024-05-03 - EIA Screening Direction Request - 03 - Scoping Report Appendices Volume 1, May 2024]** on which is shown a **blue-lined Preferred Corridor**, there are areas in the southernmost section of the proposed development that fall within HSE public safety consultation zones associated with Major Accident Hazard Pipeline(s) operated by Wales & West Utilities:
 - a. Pontyates / Lampeter Velfrey (HW021) [HSE ref: 7329, Transco ref: 1594]
 - b. Pontyates / Haverfordwest (VW041) [HSE ref: 7307, Transco ref: 1576]
 - c. Pontyates to Banc-y-Feline Pipeline [HSE ref: 8411, Transco ref: 2691]
2. The **blue-lined** areas do not currently fall within the consultation distances of any Major Accident Hazard Installation(s).
3. HSE will not advise against the 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). Further information is available at <https://www.hse.gov.uk/landuseplanning/methodology.htm>
4. 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, the HSE reserves the right to revise its advice.
5. 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 project, again the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

6. 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.

7. 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.
8. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

There are no licensed explosive sites in the vicinity so HSE has no comment to make in this regard.

Kind Regards
Shirley

NSIP Consultation Team
Health and Safety Executive

From: PEDW.Infrastructure@gov.wales <PEDW.Infrastructure@gov.wales>
Sent: Thursday, May 9, 2024 12:36 PM
Subject: HPE CM: EIA Scoping Direction Consultation for DNS CAS-03094-T7D9G0 - Green GEN Towy Teifi Grid Connection

Dear Consultees,

Please find attached a consultation letter relating to a Scoping Direction for the above proposed DNS. The applicant should have submitted a copy of the request to the relevant Local Planning Authorities Ceredigion County Council and Carmarthenshire County Council.

All documents are available via the casework portal (link provided in the letter).

If you have any problems accessing the documents or are unlikely to be able to respond by **Thursday 13 June 2024**, please let me know.

Kind regards
Georgia

Georgia Peters

[hi | she / her]

Swyddog Cynllunio | Planning Officer

Penderfyniadau Cynllunio ac Amgylchedd Cymru | Planning and Environment
Decisions Wales

Llywodraeth Cymru | Welsh Government

Llinell Uniongyrchol | Direct Line: [REDACTED]

PCAC Ymholiadau Cyffredinol Ffôn | PEDW General Enquiries Tel: 0300 123
1590

-

-



<https://llyw.cymru/penderfyniadau-cynllunio-ac-amgylchedd-cymru> |

<https://gov.wales/planning-and-environment-decisions-wales>

Sganiwyd y neges hon am bob feirws hysbys wrth iddi adael Llywodraeth Cymru. Mae Llywodraeth Cymru yn cymryd o ddifrif yr angen i ddiogelu eich data. Os cysylltwch â Llywodraeth Cymru, mae ein [hysbysiad preifatrwydd](#) yn esbonio sut rydym yn defnyddio eich gwybodaeth a sut rydym yn diogelu eich preifatrwydd. Rydym yn croesawu gohebiaeth yn Gymraeg. Byddwn yn anfon ateb yn Gymraeg i ohebiaeth a dderbynnir yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi. ----- On leaving the Welsh Government this email was scanned for all known viruses. The Welsh Government takes the protection of your data seriously. If you contact the Welsh Government then our [Privacy Notice](#) explains how we use your information and the ways in which we protect your privacy. We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



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

PEDW
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

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

Watch Manager Adrian Hall

E-bost/E-mail:

bregs@mawwfire.gov.uk

Fy Nghyf/My
Ref:

AJH/CW/00351680

Dyddiad/Date:

13 May 2024

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 Teifi Grid Connection

APPLICATION NUMBER: CAS-03094-T7D9G0

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>

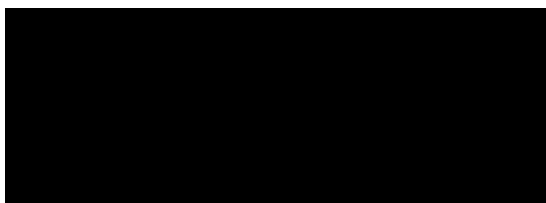
Y Pencadlys, Heol Llwyn Pisgwydd, Caerfyrddin, Sir Gâr, SA31 1SP
Headquarters, Lime Grove Avenue, Carmarthen, Carmarthenshire, SA31 1SP

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 current 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

Encs.

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.

From: Grace Lewis <[REDACTED]>
Sent: Tuesday, May 28, 2024 11:27 AM
To: PEDW – Seilwaith / Infrastructure <PEDW.Infrastructure@gov.wales>
Subject: CAS-03094-T7D9G0 - Overhead Line from the proposed Lan Fawr Energy Park to a proposed new substation near Carmarthen



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

My Ref: P/TP24/86
Your Ref: CAS-03094-T7D9G0

Date: 28 May 2024

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

APPLICATION NO: CAS-03094-T7D9G0

PROPOSAL: A 132kV overhead line connection from the proposed Lan Fawr Energy Park to a proposed new substation near Carmarthen.

LOCATION: Overhead Line from the proposed Lan Fawr Energy Park to a proposed new substation near Carmarthen

Dear Sir/Madam,

Thank you for your email dated **9 May 2024** together with the opportunity to comment on this proposal.

Network Rail has no comments to make on this application. The proposed route has no impact on NR assets and is not near any NR infrastructure.

Yours Sincerely,

Grace Lewis

Town Planning Technician Wales and Western

Network Rail

Temple Point, Redcliffe Way, Bristol, BS1 6NL

E grace.lewis@networkrail.co.uk

www.networkrail.co.uk/property

From: Andrew Bold

Sent: Monday, July 22, 2024 4:06 PM

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

Cc: Geoff Ogden

Subject: EIA Scoping Direction Consultation for DNS CAS-03094-T7D9G0 - Green GEN Towy Teifi Grid Connection

In response to your email to Geoff Ogden of 15 July, we have no further comments at this stage in relation to the Scoping Direction.

Best wishes

Andrew Bold

Dr Andrew Bold

Cynghorydd Polisi Trafnidiaeth Integredig – Integrated Transport Policy Adviser

Trafnidiaeth Cymru - Transport for Wales

T:

3 Llys Cadwyn, Pontypridd, Rhondda Cynon Taf, CF37 4TH