

Brechfa Forest Connection Project

The Written Representation of Carmarthenshire County Council

The Council's Head of Planning reported the Local Impact Report (LIR) prepared by officers to Carmarthenshire County Council's Planning Committee on 5th November 2015. Members of the Committee endorsed the content of the report as the Council's technical assessment of the evidence in the project documents and professional judgement of officers. The LIR has been prepared in accordance with the advice contained within PINS Advice Note 1 – Local Impact Reports (April 2012).

In preparing the Council's written representation regard has been given to the guidance in PINS Advice Note 2 (The role of local authorities in the development consent process, February 2015) i.e.:

Written representations and LIRs are distinct documents giving a local authority the opportunity to express information differently. The LIR is usually a technical document setting out an evidence based assessment of the impacts of a proposal on the communities affected. A written representation is the most appropriate document for a local authority to set out its view on the application i.e. whether or not it supports the application and its reasons.

Therefore the Council's view of the project's acceptability has been placed within this Written Representation. The content of this response was based on comments committee members made at the planning committee on 5th November 2015 and these form the basis of members' conclusions on the project's acceptability. The Committee unanimously agreed (notwithstanding 1 abstention) that the grid connection should be placed underground in its entirety. The reasons given are set out below:

The Council maintains the position it took in July 2013 that the entire connection should be underground and the project in its current form is contrary to the following Carmarthenshire Local Development Plan Policies (December, 2014):

Policy SP13 – Protection and Enhancement of the Built and Historic Environment

This policy states that development proposals should preserve or enhance the built and historic environment of the County; it's cultural, townscape and landscape assets and where appropriate their setting.

Members welcome the section of underground line proposed beneath part of the Towy Valley Registered Historic Landscape. However, there is concern that the line is not wholly underground within this national landscape designation, and therefore members consider that the overhead section of the line with its associated arrangement of wooden poles and wires will not reinforce local character or respect and enhance the setting of the Towy Valley Registered Historic Landscape.

Policy SP14 - Protection and Enhancement of the Natural Environment

This policy states that 'development should reflect the need, and wherever possible enhance the County' natural environment....all development proposals should be considered in accordance with...the policies of this Plan with due consideration given to areas of nature conservation value, the countryside, landscape and coastal areas including...(criterion e) features which contribute to local distinctiveness, nature conservation value or the landscape'

Members of the committee consider that the overhead section of the line would be against Policy SP14 in that the proposed wooden poles and associated electricity wires will have an unacceptable impact upon the landscape of the County and will not enhance the County's natural environment and landscape. Members have also emphasised that whilst parts of the route are not covered by local or national landscape designations they are nevertheless of high value both to residents and visitors alike

Policy SP17 - Infrastructure

The policy states that 'renewable energy generation and associated utility connections will be encouraged, in appropriate locations, subject to other Plan policies'.

The overhead line (OHL) section of the proposal will be sited within the open countryside and crosses attractive landscape which should not be subject to development which harm its qualities. The positioning of up to 25.3km of the OHL through rural Carmarthenshire will represent an excessive amount of manmade infrastructure. It is considered that the siting of single and double poles and transformers averaging 15m in height and as high as 20m will appear incongruous in the rural environment and have an unacceptable visual impact on residents and also visitors. On this basis the scale and location of the line is not considered appropriate and in keeping with the policy.

Policy GP1 – Sustainability and High Quality Design

Policy GP1 covers a wide range of criteria which presume in favour of development subject to amenity, biodiversity, design, drainage, sustainable transport interests being retained, protected or not unacceptably harmed.

Members of the committee consider that the proposal is against the intentions of criterion a) which requires development to conform with and enhance the character and appearance of the site or area in terms of siting, appearance, scale, height, massing, elevation treatment and detailing. It is clear that the proposal does not conform with or enhance the character and appearance of the area as the presence of the OHL infrastructure across 25.3km of primarily open countryside will harm the character of the existing area.

In terms of residential amenity the policy states at d) *'it would not have a significant impact on the amenity of adjacent land uses, properties, residents or the community'*. A 'moderate' impact has been concluded in the Environmental Statement upon a large number of residential dwellings. The applicant concludes that this impact is 'significant'. This adds weight to the Council's view that the OHL should be undergrounded.

The proposal is also inconsistent with i) in that a section of the OHL south of the Towy does not conform or enhance the character and appearance of the area in terms of siting, appearance, scale and height, and does not protect and enhance the Registered Landscape of Outstanding Historic Impact in Wales (RLOHIW) and the Tywi Valley Special Landscape Area (SLA).

Policy EQ1 – Protection of Buildings, Landscape and Features of Historic Importance

The policy states *'proposals for development affecting landscapes, townscapes, buildings and sites or features of historic or archaeological interest which by virtue of their historic importance, character or significance within a group of features make an important contribution to the local character and the interests of the area will only be permitted where it preserves or enhances the built and historic environment'*.

Part of the OHL section of the proposal is within the Towy Valley Registered Landscape of Outstanding Historic Importance in Wales (RLOHIW) and its presence in terms scale and siting will have an unacceptable impact upon this historic landscape designation of national importance. The proposal is therefore contrary to the policy and should also be undergrounded in this section of the project alignment.

Policy EQ6 – Special Landscape Areas

The policy states: *‘Proposals for development which enhance or improve the Special Landscape Areas through their design, appearance and landscape schemes will be permitted (subject to the policies and proposals of this Plan)’*

A section of the OHL within part of the Tywi Valley SLA will have significant adverse residual landscape effects upon the SLA. This impact neither enhances nor improves the SLA and therefore the proposal is contrary to Policy EQ6.

Members of the planning committee have noted that a separate electricity connection project in Norfolk, namely that connecting the Dudgeon Offshore wind farm to the national grid will be laid entirely underground. Members gave this as an example of the cost of placing electricity connections underground being acceptable in such schemes, and should therefore be considered by the Examining Authority and Secretary of State.

The financial cost associated with undergrounding of the whole line would be outweighed by what committee members consider are the unacceptable impacts upon the landscape of the county and amenities of residents. Furthermore by undergrounding the entire line the susceptibility to weather damage would be reduced thus lowering the associated safety risks and repair costs.

A further concern regarding the noise impact currently experienced by properties located in close proximity to existing electricity grid infrastructure was raised. By undergrounding the whole line this potential impact would not be experienced by local residents.