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**Sent:** 03 February 2016 16:05

**To:** [info@brechfaforestconnection.co.uk](mailto:info@brechfaforestconnection.co.uk)

**Cc:** Kenyon, David; Brechfa Connection; Williams, Huw

**Subject:** Brechfa Electricity Connection NSIP. NRW response to WPDs alternative option for undergrounding South of Towy River, Carmarthen.

**FAO Mr Andrew Hubbard.  
Your Ref; BFC/AH/116.**

Dear Mr Hubbard,

Thank you for your consultation letter dated, 7th January 2016, regarding the above matter and the attached cd containing the relevant plans and Addendum to the Environmental Statement on the alternative option.

The documents you enclosed;

- Addendum to the Environmental Statement. Potential undergrounding of an additional part of the Brechfa Connection. Brechfa Forest Connection project. January 2016-v.01
- Summary Addendum to the Environmental Statement. Potential undergrounding of an additional part of the Brechfa Connection. Brechfa Forest Connection project. January 2016-v.01
- Plan entitled Western Power Distribution (Brechfa Forest Connection) Order Work Plans – Alternative terminal pole 84r alignment option (Regulation 5 (2)(j) Section A. Project ref; 15/WPD/107.Drawing No. A/AW/PS/1. Application No: EN020016.

We have reviewed the above documentation and enclose for your purposes the following documents;

- a NRW formal letter to accompany our comments upon the proposed alternative option; and
- NRW comments on the proposed undergrounding alternative.

As a matter of courtesy we have forwarded a copy of this email and enclosures to PINs and also your consultant Mr David Kenyon.

Yours sincerely,  
David Watkins

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**Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu gwella a'u defnyddio yn gynaliadwy, yn awr ac yn y dyfodol.**

**Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.**

## **NATURAL RESOURCES WALES.**

### **BRECHFA FOREST GRID CONNECTION – NSIP PLANNING PROCESS**

#### **RESPONSE TO PINS ON THE SUBMITTED ES ADDENDUM – SEI FOR THE TOWY VALLEY SOUTH SIDE ALTERNATIVE PROPOSAL**

#### **LANDSCAPE AND VISUAL EFFECTS**

##### **Introduction**

1.1 This document is provided to inform the response to PINS by Natural Resources Wales (NRW) on the Addendum to the Environmental Statement submitted by WPD, the District Network Operator, in the form of Supplementary Environmental Information (SEI) in respect of the Alternative Proposal for that section of the line route to be placed underground, between poles 84 and 86, on the southern side of the River Towy valley.

1.2 The SEI was dated January 2016. This document provides a commentary on the Landscape element of the SEI and should be read in conjunction with the 'Local Impact Report' (particularly section 8, Landscape and Visual) submitted to PINS by Carmarthenshire County Council (CCC), and in the light of the matters discussed in open forum during the subsequent Issue-Specific Hearing held by PINS in Carmarthen on 8<sup>th</sup> December 2015. This Hearing was attended by representatives of both NRW and CCC. These representatives provided answers to specific questions raised and comments made by the Planning Inspector conducting the Hearing.

##### **The SEI Documents**

2.1 WPD have submitted an Addendum to the Environmental Statement text (ES Addendum), a Summary ES Addendum and supporting Figures and plans relating to the Alternative Proposal. These documents appear to be comprehensive in their content, with no obvious omissions from the information submitted in respect of landscape and visual matters.

2.2 Chapter 9 of the ES Addendum text deals specifically with the topic of 'Landscape and Visual'.

2.3 This document will concentrate primarily on the findings of the ES Addendum, as set out in the text and with reference to appropriate supporting Figures.

##### **Addendum to the ES**

###### **'Introduction'**

3.1 Paragraph 1.1.2 of this document notes that the document was '*produced in response to the concerns expressed by Natural Resources Wales (NRW) and Carmarthenshire County Council (CCC) regarding the potential landscape impacts of the proposed OHL across the Towy Valley Southern Slopes Strategic Landscape Area (SLA) and concerns regarding the potential for adverse effects on the setting of the Towy Valley Registered Landscape of Historic Importance in Wales (RLOHIW).*'

###### *Commentary*

For the record, these concerns included the predicted visual effects as well as landscape effects.

3.2 At Paragraph 1.1.4, the '*Applicant (WPD) maintains that there are no significant environmental effects reported within the ES that would arise from the erection and operation of an OHL between poles 84-86.*'

### *Commentary*

As Mr Champion explained during the Issue-Specific Hearing, the section of the line route between Poles 84-86 should not be assessed in isolation. NRW (and CCC's) standpoint has always been that the crossing of the Towy Valley was always going to be a sensitive issue, and they have explained that the undergrounding had not been extended sufficiently southwards to avoid locally significant adverse landscape and visual effects on the valley landscape. WPD's landscape consultant has evidently taken a different view as to where the valley begins and ends on the south side, and his identification and demarcation of 'project Landscape Character Areas' (pLCAs) does not correlate with the underlying LANDMAP Visual & Sensory Aspect Area boundaries; furthermore, no justification is given for this lack of correlation. NRW and CCC do not agree with the level of landscape sensitivity ascribed by the Applicant to the landscape within the area identified as pLCA6 on the southern side of the Towy Valley. Paragraphs 8.3 to 8.8, inclusive, of the CCC submitted LIR refer to these matters.

### **'Description of Alternative'**

3.3 This section of the ES Addendum provides factual information as to the nature and extent of the Alternative proposal with which we would concur.

3.4 Specifically, we note and accept from Paragraph 2.1.4 that impacts on land use are likely to be limited and temporary. We also note from Paragraph 2.1.5 that *'no watercourses would be crossed by the alternative underground section. Apart from the crossing of the BOAT, no roads or rights of way would be crossed.'*

### **'Landscape and Visual'**

#### **'Introduction'**

3.5 This section of the document deals specifically with the landscape and visual effects predicted to arise from the Alternative proposal in relation to the Proposed Development.

3.6 Paragraph 9.1.3 includes details of the *'additional representative viewpoint assessments'*, of which two were requested by NRW (and CCC).

### *Commentary*

We confirm that the two viewpoints referred to in the ES Addendum as AVP1 and AVP2, located at Abergwili Road and Abergwili - Footbridge over A40, respectively were as requested by NRW (and CCC). The other two additional viewpoints were volunteered by WPD and are helpful in predicting the visual effects from the southern edge of Abergwili village (AVP3) and Merlin's Hill (AVP4), respectively.

3.7 Paragraph 9.1.4 explains the emphasis being placed upon the long term residual operational phase effects of the development, noting that the ES Addendum *'provides only a brief summary of the construction phase effects and thereafter concentrates on the operational phase landscape and visual effects.'*

### *Commentary*

This is a realistic approach to the main landscape and visual effects arising from the consideration of the Proposed Development in relation to the Alternative proposal.

### **'Construction Phase Effects'**

3.8 Paragraphs 9.2.1 and 9.2.2 deal with the predicted construction phase effects. The conclusion here is that there would be no difference in the construction phase landscape effects arising from either the Proposed Development or the Alternative proposal.

#### *Commentary*

We agree that this is a reasonable conclusion.

### **'Operational Phase Effects'**

#### **'Effect on Landscape Character'**

3.9 Paragraph 9.3.1 concludes that, although the change to a four-pole terminal structure would occur within the far northern extents of the identified pLCA5, Middleton Hills South of Llangunnor, this effect on landscape character would be no different from that of the Proposed Development.

#### *Commentary*

We would agree with this conclusion.

3.10 Paragraph 9.3.2 draws a similar conclusion in respect of the effects on landscape character in the identified pLCA6, Towy Valley Southern Slopes: there would be no difference between the Alternative proposal and the Proposed Development.

#### *Commentary*

NRW (and CCC) maintain that the Applicant has understated the landscape sensitivity of the identified pLCA, as explained in the submitted CCC LIR (*refer to section 8.6*). This pLCA is part of the Towy Valley, as acknowledged by the name ascribed to it in the ES by the Applicant. By removing the three different types of poles – one single pole, one double pole and the four-pole terminal structure - from this sensitive landscape, we would contend that there is a locally significant landscape benefit which would be derived from the Alternative proposal when compared to the Proposed Development. The conclusions drawn by the Applicant in the ES Addendum do not appear to acknowledge this effect.

#### **'Effect on Landscape Designations'**

3.11 At Paragraph 9.3.3, the ES Addendum draws similar conclusions in respect of the effects on the character, value and integrity of the Towy Valley Special Landscape Area (SLA): there would be no difference between the Alternative proposal and the Proposed Development.

#### *Commentary*

Again, by removing the three different types of poles – one single pole, one double pole and the four-pole terminal structure - from part of this locally designated landscape, we would contend that there is a locally significant landscape benefit which would be derived from the Alternative proposal when compared to the Proposed Development.

3.12 Within the same paragraph, the Applicant only addresses the underlying designation of the Towy Valley Registered Landscape of Outstanding Historic Interest in Wales in comparative terms with the SLA. This does not do justice to the landscape effects on this *de facto* national landscape designation. Overhead electricity line infrastructure as proposed is a relatively modern feature in the

landscape which can rarely be assimilated successfully into an historic landscape without at least some detrimental effects. We would conclude that, again, by removing the three different types of poles – one single pole, one double pole and the four-pole terminal structure - from this sensitive landscape, there would be a locally significant landscape benefit which would be derived from the Alternative proposal when compared to the Proposed Development.

#### **'Visual Change at representative Viewpoint Locations'**

3.13 Paragraph 9.3.4 explains that the ES Addendum adopts the same approach as the ES when assessing the degree of change at each location.

#### *Commentary*

This consistency of approach is helpful.

3.14 Paragraph 9.3.4 identifies those representative viewpoint locations *'which have the potential to experience different views of the Alternative compared to the Proposed Development'*. It notes that, *'of these viewpoints 10, 12, 13 and 14 would experience the same degree of visual change during operation of either the Alternative or the Proposed Development, so effects on these viewpoints are not considered further'*.

#### *Commentary*

We would agree with this approach.

3.15 Paragraph 9.3.6 concludes that at Viewpoint 9 there would be no difference in the effects for the Alternative proposal or the Proposed Development, with each resulting in *'a low degree of visual change.'*

#### *Commentary*

We would agree with this approach.

3.16 At Paragraph 9.3.7, the ES Addendum assesses the effects at Viewpoint 11, concluding that *'the Alternative would bring about a reduction in the visual effect compared to the Proposed Development'*.

#### *Commentary*

We note that the assessment ascribes a change from a medium degree of visual change to a negligible degree of change. We note that the Applicant's assessment in the ES had concluded that the visual effects here were significant (and adverse). The Alternative proposal would therefore remove a significant adverse visual effect which we would regard as being a locally significant visual benefit being derived from the Alternative proposal, as opposed to the Proposed Development. *(Refer to the CCC LIR at section 8.8, page 12 for further detail on this point).*

3.17 Paragraph 9.3.8 notes, in relation to Viewpoint 15, that *'there would be a very small reduction in visual effect on this viewpoint due to a glimpsed view towards part of the southern slopes of the Towy valley between buildings to the south,'* whilst concluding that the overall level of visual change would be the same.

#### *Commentary*

This seems to indicate that there would be a minor visual benefit from the Alternative proposal as opposed to the Proposed Development, but this is not made clear.

3.18 Paragraph 9.3.9 deals with the effects at the additional representative viewpoint locations. The assessment concludes that, at additional viewpoints 1 to 3 inclusive, *'in each instance, there would be a negligible degree of visual change associated with the Alternative where undergrounding would result in there being no perceptible change in view.'* There would be no difference in the visual effects predicted to arise at additional viewpoint 4.

*Commentary*

When compared to the effects arising from the proposed Development there would be a small local visual benefit derived from the Alternative proposal.

**'Visual Effects on Residents'**

3.19 Paragraph 9.3.10 concludes that *'properties on the lower southern valley slopes and within the settlement extents of Abergwili would typically experience a relative positive visual benefit as a result of the Alternative, arising from the omission of the perceptible influence of the OHL and pole structures from the extent of view.'*

We would agree with this conclusion.

3.20 The same paragraph goes on to explain the variable effects on properties located on the upper southern valley slopes, detailing specific receptors in subsequent paragraphs 9.3.11 to 9.3.14, inclusive. At the farmstead of Tyllwyd-mawr, the Applicant concludes that there would be no difference in the visual effects arising from the Alternative proposal when compared to the Proposed Development. At the other three properties assessed, the Applicant concludes that there would be a positive benefit arising from the Alternative proposal.

*Commentary*

We would agree with these conclusions.

**'Visual Effect on Footpath Users'**

3.21 Paragraph 9.3.15 concludes that *'footpaths on the lower southern valley slopes and in the vicinity of Abergwili would typically experience a relative positive visual benefit as a result of the Alternative, arising from the omission of the perceptible influence of the OHL and pole structures from the extent of view.'*

*Commentary*

We would agree with this conclusion.

3.22 The same paragraph notes that the effects on the users of footpaths on the upper southern valley slopes would fall within a range from positive to negative, *'as the omission of the OHL and poles as a result of the Alternative would be balanced by the presence of a new terminal pole in the amended location of pole 84R.'*

3.23 The assessment goes on to provide local detail in respect of particular footpaths in paragraphs 9.3.16 and 9.3.17. At PRoW Llangunnor 19 (FP25), there is no difference in the effects between the two proposals. At PRoW Llangunnor 20 (FP26), *'the Alternative would bring about a positive benefit relative to the effect of the Proposed Development.'*

*Commentary*

We would agree with these conclusions.

**‘Visual Effect on Road Users’**

3.24 At Paragraph 9.3.18, the ES Addendum concludes that *‘the Alternative would bring about a small positive benefit relative to the effect of the Proposed Development on the users of the B4300 road.’*

*Commentary*

We would agree with this conclusion.

**‘Visual Effect on other Recreational and Visitor Locations’**

3.25 Paragraph 9.3.19 notes that these effects would be limited to those experienced from the Pant Farm Touring Caravan and Campsite. As a consequence of the removal of poles from the nearby rising ground to the south in the Alternative proposal, the assessment concludes that *‘the Alternative scheme would bring about a small positive benefit relative to the effect of the Proposed Development.’*

*Commentary*

We would agree with this conclusion.

3.26 The table below summarises the landscape and visual effects *as assessed by the ES and ES Addendum*; we have provided any additional information relating to changes in the assessment, as well as the Commentary in the fourth column, in italicised text.

**TABULAR SUMMARY OF COMPARISON OF LANDSCAPE AND VISUAL EFFECTS BETWEEN ‘THE PROPOSED DEVELOPMENT’ AND ‘THE ALTERNATIVE’ – POLES 84-86**

<b>Predicted Effects</b>	<b>Proposed Development</b>	<b>The Alternative</b>	<b>Commentary</b>
<b>Construction Phase Effects:</b>			
Overall Construction Phase Landscape Effects (Paragraph 9.2.1)	Not significant	Not significant	<i>No appreciable difference between the two approaches</i>
Overall Construction Phase Visual Effects (Paragraph 9.2.2)	Not significant	Not significant	<i>No appreciable difference between the two approaches</i>
<b>Operational Phase Effects:</b>			
Landscape Character (Paragraphs 9.3.1)	Not significant	Not significant	<i>No appreciable difference between the two approaches</i>
Landscape Character (Paragraphs 9.3.2)	Not significant <i>CCC maintain that this is potentially significant (refer to LIR at section 8.6)</i>	Not significant	<i>NRW and CCC maintain that the Applicant has understated the sensitivity of pLCA6; and pLCA5 is less sensitive than pLCA6. These effects would be locally</i>



			<i>significant. Furthermore the Alternative would remove a potentially Significant adverse landscape effect.</i>
Effects on Landscape Designations (Paragraph 9.3.3)	Not significant	Not significant	<i>No appreciable difference between the two approaches</i>
Visual Change at Representative Viewpoint Locations			
(Paragraph 9.3.5) VPs 10, 12, 13 and 14			<i>Same degree of change for Proposed development and The Alternative and not considered further, which is acceptable</i>
(Paragraph 9.3.6) VP9	Low degree of change	Low degree of change	<i>No appreciable difference between the two approaches</i>
(Paragraph 9.3.7) VP11	Medium level of visual change which was assessed as significant ( <i>refer to LIR at section 8.8</i> )	Negligible level of visual change	<i>The Alternative would bring about a reduction in the visual effect, and avoid a significant adverse effect</i>
(Paragraph 9.3.8) VP15			<i>Small reduction in visual effect produced by The Alternative.</i>
(Paragraph 9.3.9) Additional VPs 1 to 3	Low degree of change	Negligible level of visual change	<i>Small reduction in visual effect produced by The Alternative</i>
(Paragraph 9.3.9) Additional VP4			<i>No appreciable difference between the two approaches</i>
Visual Effects on Residents:			
(Paragraph 9.3.10) Lower southern valley slopes and Abergwili			<i>Relative positive visual benefit from The Alternative, arising from the omission of the OHL and pole structures</i>
(Paragraph 9.3.11) Tyllwyd-mawr	Moderate adverse effect	Moderate adverse effect	<i>No appreciable difference between the two approaches</i>
(Paragraph 9.3.12) Pant Farm	Minor Effect	Negligible Effect	<i>Small positive visual benefit from The Alternative, since no visible scheme components</i>
(Paragraph 9.3.13) Nant Farm	Moderate Effect that has been assessed as Significant	Minor Effect	<i>Small positive visual benefit from The Alternative, since terminal pole 84R would be partially screened by</i>

			<i>vegetation, and avoids a significant adverse effect</i>
(Paragraph 9.3.14) The Leadmines, The Bungalow and Towy View Park	Minor Effect	Negligible Effect	<i>Small positive visual benefit from The Alternative, since no visible scheme components</i>
Visual Effects on Footpath Users:			
(Paragraph 9.3.16) Llangunnor 19 (FP25)	Minor adverse effect	Minor adverse effect	<i>No appreciable difference between the two approaches</i>
(Paragraph 9.3.17) Llangunnor 20 (FP26)	Moderate adverse effect that has been assessed as Significant	Minor adverse effect	<i>Relative positive visual benefit from The Alternative and avoids a significant adverse effect</i>
(Paragraph 9.3.18) Visual Effect on Road Users – B4300	Minor adverse effect	Negligible Effect	<i>Relative positive visual benefit from The Alternative</i>
(Paragraph 9.3.19) Visual Effect on other Recreational and Visitor Locations – Pant Farm Touring Caravan and Campsite	Minor adverse effect	Negligible Effect	<i>Small positive visual benefit from The Alternative</i>

## Conclusions

4.1 The Alternative proposal would remove significant adverse landscape and visual effects as noted above.

4.2 It is therefore the recommendation of NRW (and CCC) that the Alternative proposal is to be preferred over the proposed development in respect of that section of the line route which traverses the southern sides of the Towy Valley.



**Cyfoeth  
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**Natural  
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Wales

Mr. Andrew Hubbard,  
Western Power Distribution,

**Our ref:** CAS -14189-KOV9  
**Your ref:** BFC/AH/116

**Date:** 3<sup>RD</sup> February 2016

Annwyl/Dear Mr. Hubbard,

**Re; Brechfa Forest Connection project-consultation on alternative option.  
Undergrounding of section of electricity line between poles 84 – 86, on the  
southern side of the River Towy, Carmarthen.**

Thank you for consulting Natural Resources Wales (NRW) on the above alternative option for undergrounding of a section of the electricity line, on the southern side of the River Towy in connection with the Brechfa Electricity Connection NSIP.

We have attached our detailed comments upon the alternative option of undergrounding the relevant section of cabling south of the Towy River. You will be aware that NRW advocate the alternative option and this opinion has been expressed previously in writing in various correspondence and also verbally at the Examination Hearings in December in Carmarthen.

Yn ddiffuant/yours sincerely,



**Mr. Peter Jordan.**  
**Planning Manager.**  
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**Phone; 03000 65 3268**

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English