

**From:** Richard E Jones [<mailto:REJones@carmarthenshire.gov.uk>]  
**Sent:** 17 March 2016 13:31  
**To:** Brechfa Connection  
**Subject:** RE: Brechfa Forest Connection EN020016

Dear Mr. Broderick

I refer to your procedural letters dated 25<sup>th</sup> February and 1<sup>st</sup> March 2016 and the additional documents displayed on the Project webpage.

The Council has responded to the documents where it considers relevant below:

### **Draft Development Consent Order BFC Vol 03.1E**

The Council is satisfied with the content of the latest draft of the DCO and therefore provides no further comments.

The Council will be signing a Statement of Common Ground with WPD in relation to draft DCO 03.01E and DCO draft 09.31 which relates to Option B. This will be submitted under separate cover by WPD.

### **Option B - Addendum to the Environmental Statement**

The Council were consulted on the Option B proposal by NRW in a separate consultation that preceded its publication on the Pins project page. Our response is attached for information. In summary the Council supports the additional undergrounding and contrary to WPD's position, is of the view that this change will mitigate the projects impacts.

### **Draft Development Consent Order BFC Vol 09.31**

The above titled draft DCO takes account of the Option B documents. The Council is satisfied with this version of the draft DCO.

The Council will be signing a Statement of Common Ground with WPD in relation to draft DCO 03.01E and Draft DCO 09.31 which relates to Option B. This will be submitted under separate cover by WPD.

### **Report on the Implications for European Sites (RIES)**

The Council has no further comments in respect of the RIES.

The content of this email is based on the technical assessment of the evidence presented in WPD's submission documents and professional judgement of officers of

the Council. This document does not contain the views of the Council's elected members, as these have been placed within the Council's Written Representation.

Please can you confirm receipt of this email.

Kind Regards

**Richard Jones**

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Mae'r e-bost hwn ac unrhyw atodiadau yn gyfrinachol ac wedi'u bwriadu at ddefnydd yr unigolyn y'u cyfeiriwyd ato/ati yn unig. Os derbyniwch y neges hon trwy gamgymeriad, rhowch wybod i'r sawl a'i hanfonodd ar unwaith, dil?wch y neges o'ch cyfrifiadur a dinistriwch unrhyw gop?au papur ohoni. Ni ddylech ddangos yr e-bost i neb arall, na gweithredu ar sail y cynnwys. Eiddo'r awdur yw unrhyw farn neu safbwyntiau a fynegir, ac nid ydynt o reidrwydd yn cynrychioli safbwynt y Cyngor. Dylech wirio am firsau eich hunan cyn agor unrhyw atodiad. Nid ydym yn derbyn unrhyw atebolrwydd am golled neu niwed a all fod wedi'i achosi gan firsau meddalwedd neu drwy ryng-gipio'r neges hon neu ymyrryd ? hi.

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## **Carmarthenshire County Council's response to the Addendum to the Environmental Statement**

### **Potential Undergrounding of an Additional Part of the Brechfa Connection**

#### **Brechfa Forest Connection Project**

The Council's response is based on the technical assessment of the evidence presented in WPD's submission documents dated January 2016. This submission does not contain the views of the Council's elected members, as these have been placed within the Council's Written Representation.

The Council has reviewed the addendum to the Environmental Statement and considers that the level of assessment that has been carried out is acceptable, whilst complying with established methodologies on each topic area. The Council agrees with the conclusions reached by the applicant in assessing the environmental effects of the alternative option in respect of Ecology, Historic Environment, Recreation and Land Use, Traffic and Transport, Noise, Air Quality, Geology and Hydrology.

In view of the above it is considered that the alternative option would not have significant effects during construction and operation. Moreover the Council is in agreement with the applicant that there will be no significant residual effects or cumulative effects as a result of the alternative undergrounding section during its construction, operation or decommissioning.

Notwithstanding the above the Council would expect the additional hedgerow translocation details and badger and bat mitigation details to be fully specified in the detailed CEMP and HMP Requirements.

The Council's Landscape consultants, Anthony Jellards Associates have responded on behalf of the Council in the document entitled *Response to Pins on the Submitted ES Addendum – SEI for the Towy Valley South Side Alternative Proposal*. This document assesses the landscape and visual effects of the alternative option on behalf of the Council and is appended to this response and should be read as part of our formal submission.

Based on our review of the additional undergrounding the Council considers that this alternative would address the concerns raised at the Issue Specific Hearing in December 2015 and we would encourage the Examining Authority to favour this ahead of the OHL option.

In the event the Examining Authority / Secretary of State considers the additional undergrounding the more acceptable option, the Council would wish to see the approved DCO amended to reflect this change.

## **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 both Natural Resources Wales (NRW) and Carmarthenshire County Council (CCC) 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 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 Campion 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	Not significant	Not significant	<i>NRW and CCC maintain that</i>

(Paragraphs 9.3.2)	<i>CCC maintain that this is potentially significant (refer to LIR at section 8.6)</i>		<i>the Applicant has understated the sensitivity of pLCA6; and pLCA5 is less sensitive than pLCA6. These effects would be locally 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 (refer to LIR at section 8.8)	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</i>

			<i>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 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.