

Todd Brumwell
EIA Advisor
The Planning Inspectorate

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire SY2 6ND

By email

Date: 4th March 2024
My Ref: 24/00616/SCO
Your Ref

Dear Mr Brumwell

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)
– Regulations 10 and 11**

**Application by Green GEN Cymru (the Applicant) for an Order granting
Development Consent for the Green GEN Vyrnwy Frankton Project (the
Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and
duty to make available information to the Applicant if requested**

I refer to your email of 24th January 2024 and associated correspondence regarding the above matter. The response below is provided by Shropshire Council as local planning authority and in its capacity as a consultation body for the project.

We have consulted with our specialist teams and would provide the following advice and recommendations in respect of the information that should be included in any Environmental Statement for the project.

Consultee responses

Archaeology

The proposed development is an approximately 50km connection between Llyn Lort Energy Park in Powys, Wales and a future substation to be located east of Oswestry. The proposed development will comprise overhead transmission lines supported by steel towers, approximately 5km of underground cables, a collector substation, a cable sealing end compound, temporary works associated with construction and potential diversions of third-party utilities.

A Scoping Report by LUC has been submitted with the application. It is understood from the report that there are thousands of designated heritage assets and non-designated heritage assets located within the scoping corridor and a 3km buffer, including Listed Buildings and Scheduled Monuments such as segments of Offa's



Dyke (NHLE 1020948 and 1003014), Blodwell Rock Camp and portions of Llanymynech Hill Camp (NHLE 1004781), segments of Wat's Dyke (NHLE 1020618, 1020616 and 1020562) and the Motte castle at Hisland (NHLE 1013497).

On this basis, the proposed development site is currently considered to have high archaeological potential.

Recommendation:

It is understood from the Scoping Report that the Environmental Statement for the proposed development will include a chapter on archaeology and cultural heritage. The chapter will be informed by the results of a historic environment desk-based assessment, which will include information derived from surveys and studies such as geophysical survey and trial trench evaluation. Officers consider that the scope of this work will be sufficient to satisfy the requirements of Policy MD13 and Paragraph 200 of the NPPF (December 2023). Officers consider the scoping and approach to surveys outlined in the Scoping Report appropriate.

Historic Conservation

Having reviewed the submitted information and Chapter 10 of the Scoping Report Officers consider that the intended reports, study area and means of identifying Heritage Assets and assessing them, and consultees noted is acceptable, in terms of the above ground historic environment. The use of ZTV to identify other HA's both inside and outside of the study area that may be impacted as a result of the proposal is also acceptable. At the northern end Hardwick Hall and its parkland should be included in the LVIA area for assessment.

In addition to Historic England's Conservation Principles, Officers would refer the applicants to further heritage guidance such as:
Historic England guidance - GPA2 and GPA3 in addition to HEAN 12 in terms of assessing heritage assets and their setting.

Ecology

The level of survey effort proposed, as set out in chapters 8 and 9 of the Scoping Report (January 2024), is appropriate. The proposed mitigation also seems practical given the species that may potentially be impacted by the proposed works (bats, birds, great crested newts, otter and hazel dormice).

With regards to Q8.3, data sets can be bought through SEDN. Enquires should be made to teds@telford.gov.uk.

Rights of Way

There are a large number of Rights of Way within the area outlined, therefore Officers ask that the applicant consults directly with the Mapping & Enforcement Team so that the correct information can be provided.



Landscape

It should be noted that our comments relate to the section of Proposed Development within Shropshire along with any general comments on the approach to the LVIA. We note that the substation at the northern end of the Scoping Corridor lies within Shropshire but will be delivered by National Grid, and therefore does not form part of the Project.

Study Area

Having reviewed Chapter 7: Landscape and Visual Amenity of the Scoping Report and accompanying Figures 7.1-7.10, we consider that the proposed study areas for both the OHL and any sections of underground cabling are appropriate. We welcome the commitment to extend the proposed 3km buffer study area for the OHL to 5km where the ZTV coincides with particularly sensitive landscape or visual receptors, and that this will be determined as the LVIA is progressed.

Landscape receptors

The information sources listed in paragraph 7.11 are appropriate for Shropshire. Given the geographical extent of a number of the Shropshire LCTs, the proposed approach set out in paragraph 7.19 that smaller, local landscape character areas be defined and taken forward as landscape receptors is acceptable, on the basis that they are informed by the Shropshire Typology.

We agree that the Shropshire Hills National Landscape can be scoped out of the LVIA.

Visual receptors

Reference to Figure 7.9 indicates that three viewpoints are currently proposed within Shropshire. Paragraphs 7.25 and 7.39 indicate that the preliminary list of viewpoints will be expanded/refined following ZTV analysis of the final proposed route and commits to further consultation with consultees (including Shropshire Council) on the final viewpoint locations. This is welcomed. We recommend that the type of visualisation (photomontage/wireline) proposed for each viewpoint also be agreed with consultees as part of future consultation.

LVIA Methodology

The proposed LVIA methodology, which will be informed by GLVIA3 and RVAA Technical Guidance Note 2/19 is considered to be appropriate. In relation to the list of documents at paragraph 7.29 of the Scoping Report, we advise:

- Landscape Institute Advice Note 01/11 Photography and photomontage in landscape and visual impact assessment was withdrawn in September 2019 on publication of Technical Guidance Note 06/19 Visual Representation of Development Proposals. The latter is now also under review.

We advise that the following documents should also be referenced and considered as part of the LVIA:



- Landscape Institute Technical Guidance Note 02/21 Assessing landscape value outside of national designations.

Proposed scope of the LVIA

The proposed scope of the LVIA, as summarised in Table 7.2 of the Scoping Report, is appropriate in relation to the Proposed Development.

Regulatory Services

Environmental Protection (EP) has reviewed the scoping report dated January 2024 and agrees with the proposed scope of the noise and vibration assessment and the approach regarding baseline noise monitoring as detailed in chapter 12. The assessment of noise from construction activities should consider the location of any construction compounds where any noise impacts are likely for a longer duration.

The proposed scope of the air quality assessment detailed in chapter 16 has also been reviewed and EP agrees with the proposed scope detailed in Table 16.1 which limits the assessment to construction dust emissions and construction vehicle emissions where the EPUK and IAQM screening criteria are exceeded.

Drainage and flood risk

The Local Lead Flood Authority (LLFA) consider the following information must form part of the Environmental Statement:

1. A Flood Risk Assessment clearly identifying all flood risk associated with temporary, and permanent works including site access arrangements within Flood Zones 2 and 3 and areas of significant pluvial flooding.
2. The early identification of Ordinary Watercourses which will require Ordinary Watercourse Consent in accordance with the Land Drainage Act 1991. Details for the OWC will include method statements for temporary and permanent works and the crossing or diversion of watercourses associated with the works.
3. Identification of a surface water drainage strategy for all additional impermeable areas constructed as part of the works.
4. In order to develop the surface and foul water designs to satisfy the LLFA's requirements, reference should be made to Shropshire Council's SuDS Handbook which can be found on the website at <https://shropshire.gov.uk/drainage-and-flooding/development-responsibility-and-maintenance/sustainable-drainage-systems-handbook/>

The Appendix A1 - Surface Water Drainage Proforma for Major Developments must also be completed and submitted with the application.



Other comments

The Scoping Report correctly acknowledges the requirement as set out in the EIA Regulations that the Environmental Statement should include a description of alternatives. We advise that this should be provided, and take account of the following further advice.

Preferred Route

We understand that potential alternative routes have been assessed by the developer. The assessment of alternatives should provide an appropriate level of detail as to the reasons for selecting the chosen option, including the factors that have been considered to be relevant and any weighting of these. The assessment should also include details as to the comparative environmental impacts of these alternative routes, in order to demonstrate the appropriateness of the decision to select the chosen route.

Undergrounding

The Scoping Report acknowledges that undergrounding of the cables could be appropriate along sections of the scoping corridor. In addition, it states that 'at this early stage in the development of the Project it is not yet possible to identify where undergrounding could be considered appropriate...'. We acknowledge that undergrounding may result in potential impacts on ecology and archaeology resources. Nevertheless as part of the EIA process opportunities for undergrounding should be fully explored given that this would have a significant bearing on the likely effects of the development on landscape and visual interests. In relation to any proposals for underground or overhead infrastructure the assessment of alternatives should set out clear reasons for the selection and include full details of the comparative environmental effects, to ensure a robust assessment.

Overhead line infrastructure

The Scoping Report provides details of 'overhead line infrastructure'. We understand from the Green GEN Grid Connection Strategy document that there are a number of different structures available to support OHL conductor wires with the ability to operate at 132kv. The type of structure proposed would clearly have a significant bearing on the overall potential impacts of the scheme. For example, there may be benefits in providing wooden poles in preference to the traditional lattices structures from a landscape and visual perspective. Consideration should be given at an early stage of the process as to whether alternative designs should be incorporated within the project in order to avoid or minimise adverse impacts. In addition the assessment of alternatives should include an appropriate level of detail as to alternative designs, and the relative environmental effect of these.



Should you have any queries in relation to the above, or require any further information, please contact me.

Yours sincerely



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