



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

Mr Robert Pridham
National Infrastructure Consent
Team
Department of Energy and Climate
Change
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6 December 2013

Dear Mr Pridham,

**APPLICATION FOR CONSENT PURSUANT TO SECTION 37 OF THE
ELECTRICITY ACT 1989 TO INSTALL A 132KV ELECTRIC LINE ABOVE
GROUND AT FROM LLANDINAM WIND FARM TO EXISTING WELSHPOOL
SUBSTATION**

I refer to the updated Environmental Statement submitted in respect of the application for consent pursuant to Section 37 of the Electricity Act 1989 to install a 132kv electric line above ground from Llandinam Wind Farm to the existing Welshpool Substation.

Under the Government of Wales Act 2006 the Welsh Government has responsibilities in respect of Wales for a range of environmental and related issues. The proposed development has the potential to affect the environment in Wales.

As a general comment, the proposed development should be in accordance with the policies set out within the Welsh Government's Planning Policy Wales with particular reference to Technical Advice Note (TAN) 8: Planning for Renewable Energy
<http://wales.gov.uk/topics/planning/policy/tans/tan8/?lang=en>

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Conservation/Nature

It is worth noting that the North East Wales Great Crested Newt project, undertaken by the Field Studies Council and Amphibian and Reptile Conservation (ARC), recently extended mapping and modelling coverage to the whole of Powys. We note that in Chapter 7 - section 7.4.66 there is no reference to this work and that some of the ponds surveyed for the power line may not have been entered into the mapping/modelling work. In terms of references to licensing for Great Crested Newts, applications for such licences would be facilitated by references to the mapping/modelling work referred to above. We would suggest that SPManweb's ecologists might wish to talk to ARC.

We note the assessments undertaken so far have identified sensitive ecological areas and species in close proximity to the project sites. You may therefore wish to consider whether a European Protected Species (EPS) licence under The Conservation of Habitats & Species Regulations 2010 will be required for all or part of the works, as it is an offence to deliberately disturb, capture, injure or kill, or damage or destroy a breeding site or resting place of an EPS. Natural Resources Wales can advise further on this.

Welsh Government have no further comments on the updated Environmental Statement from a conservation perspective, provided the views of the former Countryside Council for Wales (now Natural Resources Wales) set out in the appendices continue to be given due consideration.

Heritage/Historic Environment

Cadw has examined the Cultural Heritage Chapter of the updated Environmental Statement and are satisfied with the study area, the baseline dataset, significance criteria and assessment methodology for potential direct and indirect impacts on Scheduled Ancient Monuments (SAMs) in the vicinity. Also provided are a series of wireframe and photomontage studies, which are generally clear examples of their type although a number of the viewpoints are located not on the monuments but on the nearest publically accessible position.

A total of 2 SAMs are located within a 100m wide study corridor, a further 1 within between 100m and 200m of the power line and 56 within 2km of the line.

1. Potential direct impacts / indirect impacts within 200m

Incidental damage to the three nearest monuments to the line (listed above) during the construction and decommissioning phases is of particular concern to Cadw, potential direct impacts on MG062 and MG280 being acknowledged in Table 8.13 of the ES. There will inevitably be indirect impacts at close quarters on the settings of all three of the above-listed monuments and the conclusions of the ES that these are likely to be a '*Large / Very Large (significant)*' are considered by Cadw to be correct.

Of particular concern is the impact on the settings of MG062 /063, which comprise separate sections of the same cross-ridge dyke, the proposed line passing between

the two, arguably affecting the monument directly and interrupting lines of sight along it.

The mitigation measures set out in Section 8.6 for detailed surveys of the monuments and clear demarcation of their extents during works at MG062 and MG280 are satisfactory. Whilst incidental damage to the wooded moat MG220 on the periphery of the 100m corridor is unlikely, specific mitigation is not recommended. In Cadw's view the monument and adjoining area within the corridor should be surveyed as per MG062 and MG280 in order to identify potential related features; such a record would enhance understanding of the monument and would, to some degree, mitigate the undoubted significant impact of the line on its setting.

2. Potential indirect impacts at distances over 200m

The matrix system used to assess the magnitude of impact of the proposed line dictates that impacts on high value assets, in this case all SAMs, within 1km of the line are typically considered to be *large* or *very large* or in a few cases *moderate/large*. In general the relatively low relief of the poles and line and the varying degrees of screening offered by intervening topography, boundaries, vegetation and buildings reduces the magnitude of such impacts to *moderate*. This is demonstrated by the photo montages from the various SAMs affected by the line, which with a few exceptions (below) rarely appears in its entirety across any view. In the majority of other cases, the line is likely to merge with the backdrop provided by topography, vegetation and structures. At distances of 200m and more a pole mounted line of this elevation is in Cadw's opinion unlikely to affect any sense of place or interpretation of these monuments.

Five of the nearest monuments, all within 400m, require separate consideration:

MG013: Hen Domen Mound and Bailey Castle and the adjacent early field system (MG170), the wireframe model demonstrates that the line is likely to be clearly visible crossing pasture at a distance of 0.2km and therefore adversely affecting a key view which this important early castle is likely to have been sited to command. However, an existing single pole mounted power line runs immediately adjacent to the monument in this direction and has previously compromised this setting. In Cadw's opinion the magnitude impact can therefore be considered 'Moderate/ Large' rather than '*Large / very large (significant)*'

MG014: Forden Gaer Roman site is located within 0.3km of the line, on relatively level ground on the gravel terraces of the Severn. The wireframe model indicates that it will appear prominently in views from the scheduled area to the East, although the intervening railway embankment and wooded boundaries at a similar elevation will provide a degree of screening and the lower slopes of Fridd Faldwyn a topographic backcloth. The monument itself is very large but has been greatly reduced by ploughing and interrupted by modern boundaries. Cadw therefore consider the magnitude of impact on the monument to be '*moderate / large*' rather than '*large / very large*'.

The line passes within 300m of MG169: Great Cloddiau Camp, a hilltop defended enclosure and an adjacent cropmark enclosure MG168. The latter retains no above

ground remains and therefore has little or no presence within the present modern agricultural landscape which now forms its setting; it could therefore be argued that indirect impacts of the power line on this setting should be considered '*moderate rather than moderate / large*'. The adjacent MG169 survives as an upstanding earthwork. Several wireframe models demonstrate that the line will appear as a prominent foreground feature in views from the monument, which may have been deliberately sited to command views over and enhance its visibility from the surrounding landscape. However, this setting has been previously compromised by the adjacent outbuildings of Great Cloddiau Farm and Cadw would consider the magnitude of impact on this site to be '*moderate / large*' rather than '*large / very large*'.

Transport

The Welsh Government's Transport Division has commented separately to confirm they have nothing to add to comments submitted earlier in the process.

We trust you will carefully consider these comments.

Yours sincerely,

Michael Cummings
Energy, Water and Flood